

# **Dacorum Site Allocations Development Plan Document**

## **Sustainability Appraisal Submission Statement**

**January 2016**

### **1 Introduction**

#### **1.1 Background**

Sustainability Appraisal (incorporating Strategic Environmental Assessment) (SA/SEA) has been an integral part of the process to develop the Dacorum Site Allocations Development Plan Document (DPD) up to its Submission for Examination.

During that process a range of Sustainability Reports and Working Notes have been published to communicate the findings of the combined SA/SEA process and enable consultation. These documents have been informed by reports and working notes produced during the associated process to develop the Dacorum Core Strategy DPD.

For the Site Allocations DPD, three SA Working Notes were produced in the period between November 2006 and April 2014 and then a full SA Report was prepared to accompany the Pre-Submission Site Allocations document during the consultation from September to November 2014.

To take into account the Focused Changes that were made to the Site Allocations DPD following the representation on the Pre-Submission DPD, an SA Report Addendum was then produced in July 2015. This Addendum provided new or revised assessments for those Focused Changes that were considered to potentially affect the findings of the original SA Report – all in a positive direction. The other Focused Changes and minor changes were judged as having little or no influence on the SA Report findings.

Further minor changes prior to Submission have now been proposed to the Site Allocations DPD and for the purposes of completeness it has been necessary to determine whether any of these changes have implications in relation to the findings in the SA Report and its Addendum. This SA Submission Statement has therefore been prepared for this purpose. It should be read in conjunction with the SA Report and its Addendum.

#### **1.2 Consultation update**

Consultation has been undertaken at several stages during the development of the Site Allocations DPD (see Table 1-1 of the SA Report Addendum (July 2015) for details).

At each subsequent SA reporting stage, the details of the representations to the consultation on the previous stage have been provided, along with their implications for the sustainability appraisal. This SA Submission Statement therefore provides information on the consultation on the SA Report Addendum (July 2015) that was prepared to accompany consultation on the Focused Changes to the Pre-Submission Site Allocations DPD.

One representation relating to the SA/SEA was received during that consultation. No representations were received that related to the Habitats Regulations Assessment (HRA).

The representation on the SA/SEA was received from the Hertfordshire County Council Ecology Officer. Details of the representation and the SA/SEA responses are provided in Appendix A. No changes have been made to the previous SA/SEA assessments.

## 2 Minor changes to the Site Allocations Pre-Submission (incorporating Focused Changes)

Following the consultation on the Focused Changes to the Pre-Submission Site Allocations DPD in summer 2015, a further series of minor changes to the text of the DPD, as amended by the Focused Changes, have been proposed prior to the Submission of the DPD for Examination.

The minor changes relate to the following Site Allocations:

- Proposal S/1: Jarman Fields, St Albans Road;
- Policy LA1: Marchmont Farm, Hemel Hempstead;
- Policy LA2: Old Town, Hemel Hempstead;
- Policy LA3: West Hemel Hempstead;
- Policy LA4: Hanburys, Shootersway, Berkhamsted;
- Policy LA5: Icknield Way, West of Tring; and
- Proposal L/4: Dunsley Farm, London Road, Tring.

The full details of the minor changes are shown in Appendix B.

## 3 Implications of Minor Changes

### 3.1 Introduction

For each of the minor changes, the implications in relation to the findings of the previous assessments included in the SA Report and its Addendum have been considered. The results of this 'screening' process are documented in Appendix B. In addition, the implications for the Habitats Regulations Assessment (HRA) have also been taken into account (see Section 3.3).

### 3.2 Implications for Sustainability Appraisal

Of the 14 minor changes to the Site Allocations DPD, 11 have been identified as having no implications for the findings of the SA Report and its Addendum. The remaining three minor changes have been identified as having positive implications as follows:

- **Proposal S/1: Jarman Fields, St Albans Road** – the change has positive implications for SA Objective 20 '*Revitalise Town Centres*' as the assessment of the original policy identified that development of this site could adversely affect the vibrancy of the town centre should it attract shoppers away from the centre. This has now been addressed with the additional policy wording;
- **Policy LA3: West Hemel Hempstead** - the change has positive implications for SA Objective 1 '*Biodiversity*' as it will help to reduce adverse effects on biodiversity. However there is no overall change to the original 'minor negative' assessment against this SA Objective, which relates to the loss or damage to some habitats that will result from development of this greenfield site; and
- **Proposal L/4: Dunsley Farm, London Road, Tring** - the change has positive implications for SA Objective 1 '*Biodiversity*' as it will help to reduce adverse effects on biodiversity and potentially result in enhancement. As a result, the previous 'neutral' assessment reported in the SA Report Addendum becomes a 'minor positive' assessment. The change also has positive implications for SA Objective 12 '*Health*', however it does not change the already 'minor positive' assessment.

No new significant effects, either positive or negative have been identified. In addition, none of the previously identified significant effects have either been altered or become no longer applicable as a result of the minor changes.

### **3.3 Implications for Habitats Regulations Assessment (HRA)**

A Habitats Regulations Assessment (HRA) was undertaken for the Dacorum Core Strategy and this concluded that there would be no significant effects, as a result of either air pollution or recreation disturbance, on Chiltern Beechwoods SAC from either individual developments or cumulative effects from the implementation of the Core Strategy. Natural England agreed with the conclusions of the HRA and the avoidance and mitigation proposed.

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 would alter the findings of the HRA of the Core Strategy. Based on their review of the Pre-Submission Site Allocations DPD Natural England were satisfied with this conclusion.

The changes proposed in the Focused Changes to the Site Allocations (July 2015) were screened to determine whether there were any that were of a nature that could alter the findings of the Core Strategy HRA. This additional screening process concluded that none of the Focused Changes were of a scale and/or location that would alter the findings of the previous HRA.

The additional minor changes now being proposed to the Site Allocations (see Appendix B) have been screened to determine whether there are any that are of a nature that could alter the findings of the Core Strategy HRA.

As for the Focused Changes, the result of this additional screening process is that it is considered that none of the minor changes are of a nature (in terms of scale and/or location) that will alter the findings of the previous HRA. Therefore the conclusions of the Core Strategy HRA Report continue to remain unchanged.

## **4 Conclusions**

Whilst some minor positive implications for the sustainability appraisal have been identified in relation to the minor changes, no new significant effects have been predicted. In addition, none of the previously identified significant effects have either been altered or become no longer applicable as a result of the minor changes.

In addition the findings of the Habitats Regulations Assessment, that there would be no significant effects on Chiltern Beechwoods SAC, remain unchanged.

## Appendix A: Focused Changes to the Site Allocations: SA/SEA Representations

C4S responses to issues raised in the representations

Representations requiring response or further action	C4S response to representation
<b>Hertfordshire County Council – Ecology Officer</b>	
<p>1. LA4 will destroy a moderately sized Wildlife Site quality grassland. The impact and implications of this are described thus:</p> <p><i>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.</i></p> <p>That some habitat works 'could help mitigate' these effects as 'could potential' developer contributions is, in my view, a very weak response given the SA objective '<i>To protect, maintain and enhance biodiversity...at all levels</i>'.</p> <p>Consequently the '<i>minor adverse impacts</i>' assessment is <b>wholly inappropriate</b> in my opinion, certainly at the District level, which will lose a high quality grassland unless compensation is provided. I consider this should be viewed as very unsustainable given the weak claims on compensation.</p> <p>In any event I remain very concerned this compensation will not happen in practice and that, consequently, the amendments I have suggested are therefore required to help ensure it does.</p>	<p>Based on the response received from the Herts CC Ecologist during the consultation at the Pre-Submission stage the assessment was updated to reflect the high quality grassland element of the site. However the predicted 'minor adverse effect' was not changed.</p> <p>The text in Policy LA4 and the associated Site Masterplan address this issue and it has therefore not been deemed appropriate to provide a significant adverse effect against the biodiversity objective.</p>
<p>2. Proposed amendment SC10 –effectively a Change of Use from farmland to formal sports pitches - is considered to have <u>no predicted effects</u> on most SA objectives, including Biodiversity or Landscape &amp; Townscape.</p> <p>The longer-term potential for this school and community facility to require floodlighting consistent with other sports uses in the area is clearly an ecological and wider environmental issue. So is the retention or enhancement of associated hedgerows. I consider this should be given at least an <b>uncertain</b> assessment – as there <i>will</i> be impacts of different kinds associated with this proposal which will need to be managed if, as or when the proposal is implemented.</p> <p>Furthermore, such a Change of Use will clearly change the local character of the area in both form and function, from rural farmland to formal leisure facility. This <i>must</i> have an impact on the local townscape and landscape by definition, although again, this could be managed as necessary. Consequently I would have considered an <b>uncertain</b> assessment to have been more appropriate.</p> <p>On this basis I consider the assessments should be amended to reflect these implications.</p>	<p>In relation to the biodiversity objective, Proposal L/4 has been updated as follows.</p> <p><i>"Existing hedgerows to be retained and enhanced where possible to minimise any impact upon the ecological value of the site, including existing wildlife corridors."</i></p> <p>In addition there are no plans to introduce floodlighting.</p> <p>As a result, the assessment of 'no predicted effects' against the biodiversity objective is considered to be appropriate for the change of use to playing fields.</p> <p>In relation to the landscape objective, as neither floodlighting nor buildings or ancillary facilities are proposed as part of Proposal L/4, the assessment of 'no predicted effects' is considered to be appropriate for the change of use.</p>
<p>3. I also take this opportunity to again highlight my concerns regarding the Turners Hill area of Hemel Hempstead.</p> <p>In this respect I note the Map Amendments for The Sustainable Development Strategy, include:</p> <p><i>Page 22: amend MU/2 to show enlarged area previously designated at H/8.</i></p> <p>This is defined as:</p> <p><b>Mixed Use Development</b></p> <p><i>MU/2: Hemel Hempstead Hospital Site, Hillfield Road, Hemel Hempstead – amended to show larger area (comprising addition of The Dell)</i></p>	<p>This comment is more related to the Plan than to the SA/SEA.</p> <p>The removal of The Dell from allocation H/8 (now renumbered as H/7) and inclusion in MU/2 (through Focused Changes MC50 and MC5 respectively) does not have any implications for the SA/SEA as there are no proposals, under either option, to develop The Dell.</p>

This area includes two large Wildlife Site grasslands known as Paradise Fields Central (Ref 66/013/01) and a locally important wooded hollow (The Dell) which has supported protected species. These issues should have been drawn to the attention of the LPA in previous comments and have been considered accordingly.

However I take this opportunity - given the map **amendment** affecting these areas - to highlight the fact that these represent important ecological resources within Hemel Hempstead and should not be lost to development. The adjacent Turners Hill (H8) remains as a Housing Proposal site and will degrade the adjacent sites anyway if developed, by removing adjacent habitat and introducing additional local disturbance.

Although the grassland was of insufficient quality to justify Wildlife Site status when originally surveyed, given the size, shape and location of the Dell, **I am unclear as to why the Dell was retained at all within a planning site for mixed use development.** The opportunity could have been taken to remove it entirely unless some form of development is planned, which would inevitably lead to further environmental degradation locally.

Perhaps the rationale behind this needs explaining if the intention is to retain these local ecological resources.

## Appendix B: Screening of Minor Changes

Site Allocations Reference	Minor Change	Implications for Sustainability Appraisal
<b>DPD Chapter: STRENGTHENING ECONOMIC PROSPERITY</b>		
<b>Proposal S/1</b>	<p>Amend Focused Change SC6 as follows:  '<u>Acceptable uses are retail and leisure uses. Approximately 7,000 sqm (gross) of retail floorspace is acceptable, except for the sale and display of clothing and footwear, unless ancillary to the main use of an individual unit. The nature and scale of development should aim to maximise the use of the site and ensure no significant adverse impact on Hemel Hempstead town centre. The sale and display of clothing and footwear is not acceptable, unless ancillary to the main use of an individual unit.</u>'</p>	<p>This change has <b>positive implications</b> for SA Objective 20 'Revitalise Town Centres' as the assessment of the original policy identified that development of this site could adversely affect the vibrancy of the town centre should it attract shoppers away from the centre. This has now been addressed with the additional policy wording.</p>
<b>DPD Chapter: PROVIDING HOMES AND COMMUNITY SERVICES</b>		
<b>Policy LA1</b>	<p><i>Revised site layout to recognise existing pedestrian link between Link Road and Margaret Lloyd Park within indicative block layout; and to remove reference to a specified landscaped buffer on the western boundary of the site to enable a natural delineation along the planted settlement edge.</i></p> <p>Delete the following text (suggested as Focused Change MC18):  '<del>The Council's expectation is that the development will initially be progressed as an outline application covering the site as a whole, followed by a series of reserved matters (or full applications) for each phase (or series of phases). This is in order to secure a comprehensive approach to the delivery of the scheme and associated works and contributions.</del>'  and replace with the following text:  '<u>The Council will require that when a planning application or planning applications are brought forward for the allocation they demonstrate compliance with this Master Plan and a comprehensive approach to the development of the allocation, including the nature and timing of delivery of community infrastructure and other planning obligations.</u>'</p>	<p>No implications for the findings of the SA Report and its Addendum.</p> <p>No implications for the findings of the SA Report and its Addendum.</p>
<b>Policy LA2</b>	<p><i>Minor amendments to framework plan to make clear that there is no vehicular access linking with existing residential areas via Townsend.</i></p> <p>Delete the following text (suggested as Focused Change MC21):  '<del>Limit housing to two storeys, except where a higher element would create interest and focal points in the street scene, and would not be harmful to the historic environment.</del>'  and replace with the following text:  '<u>Limit housing to two storeys, except where two and a half storey housing would create interest and focal points in the street scene, and would not be harmful to the historic character.</u>'</p>	<p>No implications for the findings of the SA Report and its Addendum.</p> <p>No implications for the findings of the SA Report and its Addendum.</p>
<b>Policy LA3</b>	<p><i>Minor amendments to framework plan to remove reference to footpath access extending outside of the master plan area, to ensure consistency with the updated plan in the Master Plan document and to show correct extent of site in south west corner to tally with site boundary on Policies Map and master plan.</i></p> <p>Delete the following text (suggested as Focused Change MC25):  '<del>The Council's expectation is that the development will initially be progressed as an outline application covering the site as a whole, followed by a series of reserved matters (or full applications) for each phase (or series of phases). This is in order to secure a comprehensive approach to the delivery of the scheme and associated works and contributions.</del>'  and replace with the following text:  '<u>The Council will require that when a planning application or planning applications are brought forward for the allocation they demonstrate compliance with this Master Plan and a comprehensive approach to the development of the allocation, including the nature and timing of delivery of community infrastructure and other planning obligations.</u>'</p> <p>Amend MC24 (a Key Development Principle for the site) as follows :</p> <ul style="list-style-type: none"> <li>• Design, layout and landscaping to <u>mitigate the impacts on</u> the archaeological, heritage and <u>ecological</u> assets within the site <u>and safeguard those</u> adjoining the development.</li> </ul>	<p>No implications for the findings of the SA Report and its Addendum.</p> <p>No implications for the findings of the SA Report and its Addendum.</p> <p>This change has <b>positive implications</b> for SA Objective 1 'Biodiversity' as it will help to reduce adverse effects on biodiversity. However there is no overall change to the original 'minor negative' assessment against this SA Objective, which relates to</p>

Site Allocations Reference	Minor Change	Implications for Sustainability Appraisal
		the loss or damage to some habitats that will result from development of this greenfield site.
Policy LA4	Delete the following text (suggested as Focused Change MC28): <del>'The Council's expectation is that the development will initially be progressed as an outline application covering the site as a whole. This is in order to secure a comprehensive approach to the delivery of the scheme and associated works and contributions.'</del> and replace with the following text: <u>'The Council will require that when a planning application or planning applications are brought forward for the allocation they demonstrate compliance with this Master Plan and a comprehensive approach to the development of the allocation, including the nature and timing of delivery of community infrastructure and other planning obligations.'</u>	No implications for the findings of the SA Report and its Addendum.
Policy LA5	Delete the existing text for bullet point 3 at the start of the policy, as follows: <del>'An extension to the cemetery of around 1.6 hectares, in the western fields, and also car parking and associated facilities for the cemetery in the eastern fields development area.'</del> and replace by the following text, as it is uncertain whether the associated facilities for the cemetery will be located in the new car park or within the existing cemetery: <del>'An extension to the cemetery of around 1.6 hectares, in the western fields, and also car parking for the cemetery in the eastern fields development area.'</del>	No implications for the findings of the SA Report and its Addendum.
	<i>Delete the existing text for key development principle 11, as follows, for consistency with changes made to the associated master plan:</i> <del>'Locate car parking (at least 30 spaces) and other facilities for the cemetery in the development area, adjacent to the cemetery extension.'</del> and replace with the following text, as it is uncertain whether the other facilities for the cemetery will be located in the new car park or within the existing cemetery: <u>'Locate car parking (at least 30 spaces) for the cemetery in the development area, adjacent to the cemetery extension.'</u>	No implications for the findings of the SA Report and its Addendum.
	<i>Replace existing indicative layout map with amended version which deletes the words 'and other facilities' from the label for 'Cemetery car park', for consistency with changes made to the draft master plan.</i>	No implications for the findings of the SA Report and its Addendum.
	Delete the following text (suggested as Focused Change MC34): <del>'The Council's expectation is that the development will initially be progressed as an outline application covering the site as a whole. This is in order to secure a comprehensive approach to the delivery of the scheme and associated works and contributions.'</del> and replace with the following text: <u>'The Council expects that the development of the site will be progressed by a hybrid planning application, which seeks full permission for the proposed housing development and outline permission for the other elements of LA5. This is in order to secure a comprehensive approach to the delivery of the scheme and associated works and contributions.'</u>	No implications for the findings of the SA Report and its Addendum.
Proposal L/4	Amend the text of Proposal L/4 (Focused Change SC10) as follows:  Proposal linked to the potential future redevelopment of Tring School to make provisions for detached playing fields in the event that they should be required as result of the school's physical expansion. The site should provide sufficient space for playing pitches for outdoor sports in order to meet the school's requirements and Sport England standards guidance. These playing pitches will be also be made available for community use. <u>Existing hedgerows to be retained and enhanced where possible to minimise any impact upon the ecological value of the site, including existing wildlife corridors. Pedestrian access to the site to be via adjacent cricket pitch. Consideration to be given to the provision of a pedestrian crossing point on Station Road to ensure safety of movement between the site and school.</u>	This change has <b>positive implications</b> for SA Objective 1 'Biodiversity' as it will help to reduce adverse effects on biodiversity and potentially result in enhancement. As a result, the previous neutral assessment reported in the SA Report Addendum becomes a 'minor positive' assessment.  The change also has <b>positive implications</b> for SA Objective 12 'Health', however it does not change the already 'minor positive' assessment.