

**Hertsmere Borough Council**

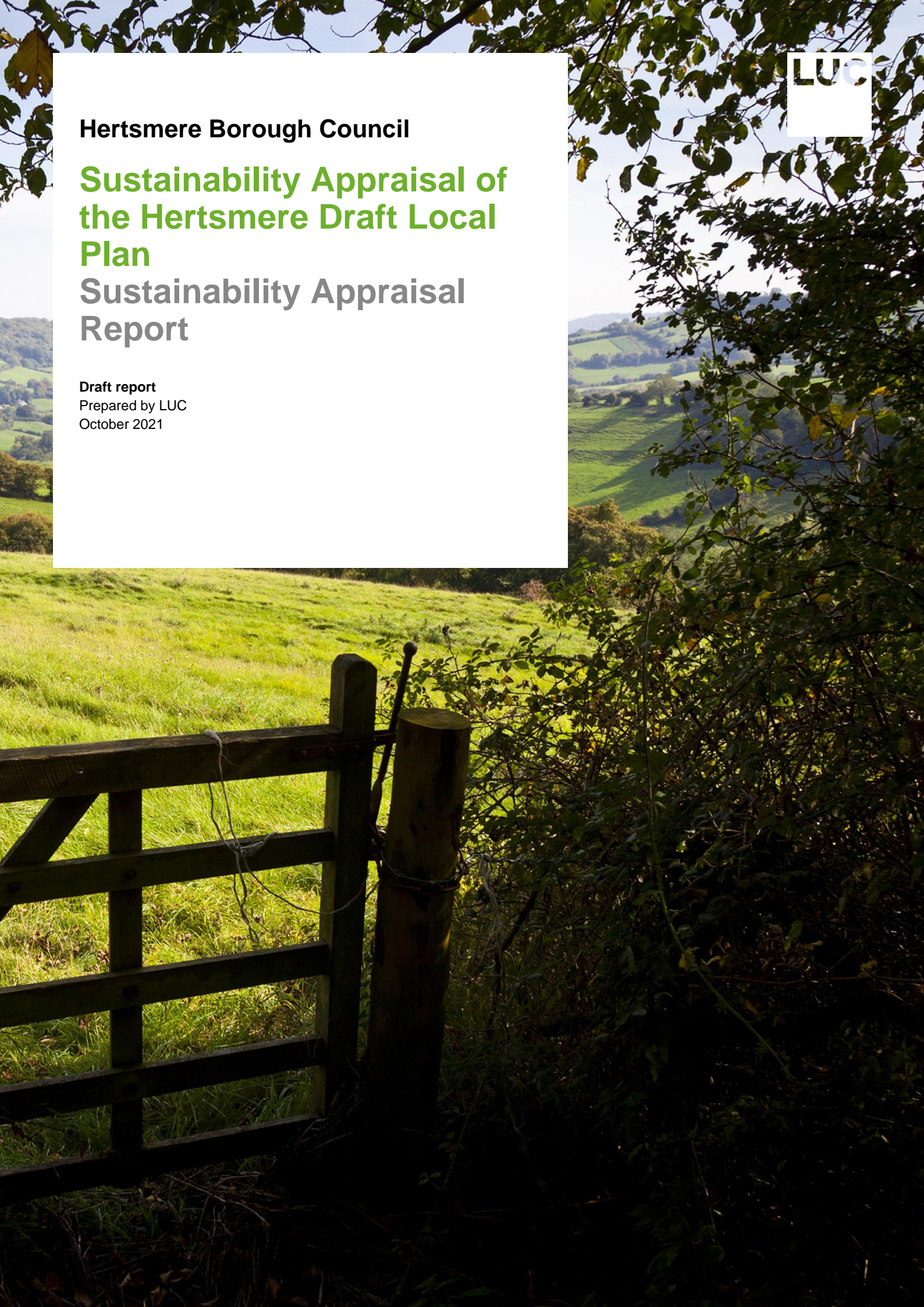
# **Sustainability Appraisal of the Hertsmere Draft Local Plan**

## **Sustainability Appraisal Report**

**Draft report**

Prepared by LUC

October 2021

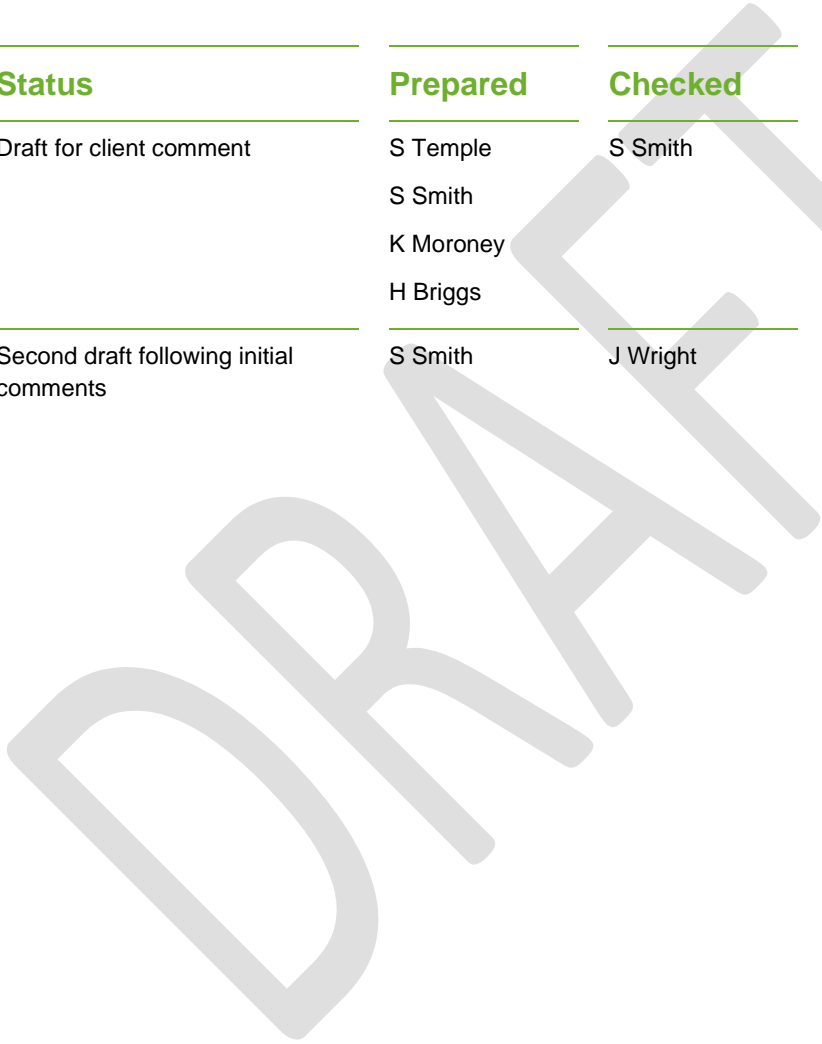




**Hertsmere Borough Council**

**Sustainability Appraisal of the Hertsmere Draft Local Plan**  
**Sustainability Appraisal Report**

Version	Status	Prepared	Checked	Approved	Date
1.	Draft for client comment	S Temple S Smith K Moroney H Briggs	S Smith	J Wright	21.09.2021
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# Contents

<b>Chapter 1</b>		<b>Chapter 5</b>	
<b>Introduction</b>		<b>1 Sustainability Appraisal Findings for the Draft Local Plan</b>	<b>67</b>
Context for the Hertsmere Local Plan	1	2 Local Plan Vision and Strategic Objectives	67
The Local Plan	2	Sustainable Growth	76
Sustainability Appraisal and Strategic Environmental Assessment	3	3 Meeting Local Housing Needs	90
Habitats Regulations Assessment	3	3 A Strong Local Economy	113
Structure of this Report	3	3 Green Belt	135
		Responding to Climate Change	143
		Design for Life	151
		<b>8 Local Heritage</b>	161
		9 Protecting and Enhancing the Natural Environment	169
		9 Local Facilities	195
		Sustainable Travel	209
		17 Vibrant Town Centres	221
		18	
		<b>18 Chapter 6</b>	
		<b>18 Cumulative and In-Combination Effects of the Draft Local Plan</b>	<b>242</b>
		18 Cumulative Effects	250
		18 In-Combination Effects	253
		22 Mitigation and Recommendations	258
<b>Chapter 2</b>		<b>Chapter 7</b>	
<b>Methodology</b>		<b>Monitoring</b>	<b>260</b>
Stage A: Scoping			
SA Stage B: Developing and Refining Options and Assessing Effects			
SA Stage C: Preparing the SA Report			
SA Stage D: Consultation on Local Plan and this SA Report			
SA Stage E: Monitoring Implementation of the Local Plan			
Appraisal Methodology			
Difficulties Encountered and Limitations			
<b>Chapter 3</b>		<b>Chapter 8</b>	
<b>Sustainability Context for Development in Hertsmere</b>	<b>25</b>	<b>Conclusions</b>	<b>263</b>
Review of Plans, Policies and Programmes	25	Next Steps	263
Baseline Information	26		
Key Sustainability Issues	27		
<b>Chapter 4</b>			
<b>Sustainability Appraisal Findings for Reasonable Alternatives</b>	<b>35</b>		
Housing Provision Options	35		
Employment Provision Options	37		
Summary of SA Findings for Housing Sites	48		
Summary of SA Findings for Employment Sites	55		
Summary of SA Findings for Mixed Use Sites	58		
Mitigation	59		
Recommendations	64		

# Chapter 1

## Introduction

**1.1** This Sustainability Appraisal Report has been prepared by LUC on behalf of Hertsmere Borough Council as part of the integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the Hertsmere Local Plan. This report presents an assessment of the Draft Local Plan (September 2021) for Hertsmere.

### Context for the Hertsmere Local Plan

**1.2** Hertsmere is located in southern Hertfordshire on the outer fringes of London and borders the London Boroughs of Barnet, Harrow and Enfield as well as Welwyn Hatfield, Three Rivers, Watford and St Albans Councils. The population of the Borough is primarily concentrated within the four main settlements of Borehamwood, Bushey, Potters Bar and Radlett, in addition to a number of smaller settlements including Aldenham, Elstree, Letchmore Heath, South Mimms, Ridge and Shenley. The Borough has good road and rail links with mainline stations at Elstree and Borehamwood, Potters Bar and Radlett (with Bushey just outside the Borough), as well as the M25 running through the Borough with two junctions (23 and 24), the M1, A1(M) and A41.

**1.3** Nearly 80% of the 100km<sup>2</sup> (38.6 sq. miles) of the Borough comprises land in the Metropolitan Green Belt. Minor amendments to the Green Belt boundary were made in 2016, following the adoption of the Site Allocations and Development Management Policies Plan, resulting in the former Shenley Hospital site (developed for housing in the 1990s) being taken out of the Green Belt as well as an area of safeguarded land for employment (approximately 17 hectares) at Rowley Lane, Borehamwood, along with a number of smaller boundary alterations. The majority of the Borough is located within the Watling Chase Community Forest and despite its proximity to London; there is a predominantly rural character to much of the Borough. There are a number of 'Gateway Sites' to the Watling Chase Community Forest, which provide car free points of entry to the Forest's network of paths and routes, some of which are experiencing significant development and traffic pressure.

**1.4** Hertsmere has a population of just over 100,000, with a high employment rate and a large proportion of small businesses. The area remains a major hub for UK and international film and TV production in the form of Elstree Studios and BBC Elstree, both located in Borehamwood. A number of nationally significant research institutions are also

based in the Borough including the National Institute for Biological Standards and Control (NIBSC), Bio Products Laboratory and Cancer Research UK/University College London.

## Climate Emergency

**1.5** Hertsmere Borough Council declared a climate emergency in September 2019. The Council has pledged to achieve net zero carbon emissions no later than 2050. This primarily relates to reducing and offsetting the Council's operational emissions, the Council as adopted a Climate Change and Sustainability Strategy and Action Plan, which seek to influence further afield, including promoting the circular economy, and promoting zero carbon and sustainable development<sup>1</sup>. The Local Plan can play a key role in minimising carbon emissions by allocating sites in sustainable locations and through design, including requiring integration of energy efficiency measures and renewable energy generation, and through reducing the need to travel by car.

**1.6** The SA framework includes three objectives directly related to climate change:

- SA Objective 9: To reduce greenhouse gas emissions, including a reduced dependence on the private car.
- SA Objective 12: To minimise the risk of flooding, taking account of climate change.
- SA Objective 14: To minimise the need for energy, increase energy efficiency and increase the use of renewable energy.

**1.7** A number of other SA objectives relate to climate change. For example, objectives relating to access to services and facilities (SA Objective 1 (Education), SA Objective 2 (Services)) are related to SA Objective 9 (Greenhouse Gas Emissions), as well located services and facilities will reduce the need to travel. Other objectives relate to climate change adaptation. For example, climate change is expected to lead to changes in water availability (SA Objective 11 (Water Quality and Quantity)), changes in soil quality (SA Objective 6 (Soil and Minerals)) and habitat suitability (SA Objective 10 (Biodiversity and Geodiversity)).

## The Local Plan

**1.8** Hertsmere Borough Council is currently preparing a new Local Plan to guide development in the Borough over the next 15 years. Once adopted, the new Local Plan will replace the Hertsmere Local Plan (2012-2027) which consists of the Core Strategy (adopted January 2013), the Elstree Way Corridor Area Action Plan (adopted July 2015), the Site Allocations and

Development Management Policies Plan (adopted November 2016) and the Policies Map (published November 2016).

**1.9** The Core Strategy sets out the Council's vision for the Borough to 2027, providing the foundation for decisions on planning applications and development proposals affecting the area. The adopted Core Strategy seeks to strike a balance between the Borough's housing and economic development needs, social welfare and protection of the environment. The Site Allocations and Development Management Policies Plan sets out detailed proposals and policies by which the Council sees the aims and objectives of the Core Strategy being best achieved.

**1.10** The new Local Plan sets out the vision and objectives for the future of Hertsmere up to 2038, and reconsiders housing and employment needs. It will allocate sites for housing, employment and other forms of development and will set out development management policies for the Borough up to 2038.

**1.11** A number of studies are being prepared to support the Local Plan, many of which are being undertaken jointly with neighbouring authorities in South West Hertfordshire, who form part of a common Housing Market Area and Functional Economic Market Area. Supporting studies include the South West Hertfordshire Local Housing Needs Assessment (2020), Housing and Economic Land Availability Assessment (2019), South West Hertfordshire Strategic Housing Market Assessment (2016), Gypsy and Traveller Accommodation Needs Study (2017) and other studies covering areas such as retail, leisure and economy, flood risk, sport and recreation, landscape and water.

**1.12** The Council intends to consult on four stages of the Local Plan as follows:

- Issues and Options (February 2018).
- Potential Sites for Housing and Employment (October 2018).
- Draft Local Plan (which this document relates to).
- Proposed Submission Local Plan, also known as Publication or Regulation 19 stage (Spring 2022).

<sup>1</sup> Hertsmere Borough Council (2021) Climate Change and the Council [Online] Available at: <https://www.hertsmere.gov.uk/Environment->

[Refuse-and-Recycling/Climate-change/Climate-Change-and-the-council.aspx](https://www.hertsmere.gov.uk/Environment-Refuse-and-Recycling/Climate-change/Climate-Change-and-the-council.aspx)

## Sustainability Appraisal and Strategic Environmental Assessment

**1.13** Sustainability Appraisal is a statutory requirement of the Planning and Compulsory Purchase Act 2004<sup>2</sup>. It is designed to ensure that the Plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.

**1.14** Strategic Environmental Assessment (SEA) is also a statutory assessment process, required by the SEA Regulations (Statutory Instrument 2004, No 1633, as amended by Statutory Instrument 2018 No 1232 and by Statutory Instrument 2020 No 1531)<sup>3</sup>. The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA). The purpose of SEA is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans with a view to promoting sustainable development.

**1.15** European Directives have shaped Sustainability Appraisal, planning and environmental, social and economic regulation, including Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive'). The UK left the European Union on 31 January 2020. Following the end of the transition period in December 2020, UK legislation that transposed EU Regulations and Directives continues to apply, as set out in the European Union (Withdrawal) Act 2018 (EUWA) and the 'EU Exit' versions.

**1.16** SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts. National Planning Practice Guidance<sup>4</sup> shows how it is possible to satisfy both requirements by undertaking a joint SA/SEA process, and to present an SA report that incorporates the requirements of the SEA Regulations. The SA/SEA of the Hertsmere Local Plan is being undertaken using this integrated approach and throughout this report the

abbreviation 'SA' should therefore be taken to refer to 'SA incorporating the requirements of SEA'.

## Habitats Regulations Assessment

**1.17** The requirement to undertake Habitats Regulations Assessment (HRA) of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in July 2007 and updated in 2010 and again in 2012 and 2017 (and amended in 2019 to take account of the UK's departure from the EU). The Regulations translate Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) and 79/409/EEC (Birds Directive) into UK law. The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European site and to ascertain whether it would adversely affect the integrity of that site.

**1.18** The HRA for the Hertsmere Local Plan is being undertaken by LUC on behalf of the Council. While the HRA is reported on separately to the SA, the findings are taken into account in the SA where relevant (for example to inform judgements about the likely effects of the Local Plan on biodiversity).

## Structure of this Report

**1.19** This report provides a record of the assessment of the potential sites for housing and employment for the Hertsmere Local Plan. Table 1.1: below signposts how the requirements of the SEA Regulations have been met within this report.

<sup>2</sup> The Planning and Compulsory Purchase Act 2004 was amended under the Environmental Assessments and Miscellaneous Planning (EU Exit) Regulations 2018.

<sup>3</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by *The Environment*

*Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232) and The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531).*

<sup>4</sup> <http://planningguidance.planningportal.gov.uk/>

**Table 1.1: Requirements of the SEA Regulations and where these have been addressed in this SA Report**

SEA Regulation Requirements	Where Covered in this SA Report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Schedule 2):	
a. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	<b>Chapter 1, Chapter 3 and Appendix C</b>
b. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	<b>Chapter 3 and Appendix D</b>
c. The environmental characteristics of areas likely to be significantly affected.	<b>Chapter 3 and Appendix D</b>
d. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	<b>Chapter 3 and Appendix D</b>
e. The environmental protection, objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	<b>Chapter 3 and Appendix C</b>
f. The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	<b>Chapter 4, Chapter 5 and Chapter 6</b>
g. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	<b>Chapter 4 and Chapter 6</b>
h. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	<b>Chapter 2</b> provides information about how the assessment was undertaken and difficulties encountered. <b>Chapter 2</b> also provides information about how the Council identified the potential sites for housing and employment that are assessed in this document. Information about the reasons for selecting or rejecting site options are included in <b>Appendix I</b> .
i. A description of measures envisaged concerning monitoring in accordance with Regulation 17.	<b>Chapter 7</b>
j. A non-technical summary of the information provided under the above paragraphs.	A separate non-technical summary document will be prepared to accompany the SA report for the Publication version of the Local Plan.

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SEA Regulation Requirements	Where Covered in this SA Report
<p>k. The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of:</p> <ul style="list-style-type: none"> <li>■ Current knowledge and methods of assessment;</li> <li>■ The contents and level of detail in the plan or programme;</li> <li>■ The stage of the plan or programme in the decision-making process; and</li> <li>■ The extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment. (Regulation 12 (3)).</li> </ul>	Addressed throughout this SA Report.
<b>Consultation:</b>	
When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies (Regulation 12 (5)).	Consultation on the SA Scoping Report was undertaken between September and October 2017. Comments received and how these have been addressed are recorded in <b>Appendix A</b> .
Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying environmental report shall be made available for the purposes of consultation including with the consultation bodies, other relevant stakeholders and the public (Regulation 13).	The Potential Sites for Housing and Employment consultation (including an SA of these sites) took place in late 2018. This SA report will be published for consultation alongside the Draft Local Plan from 11 <sup>th</sup> October 2021 for a six week period.
Where a responsible authority, other than the Secretary of State, is of the opinion that a plan or programme for which it is the responsible authority is likely to have significant effects on the environment of another Member State, it shall, as soon as reasonably practicable after forming that opinion:	N/A
<ul style="list-style-type: none"> <li>■ Notify the Secretary of State of its opinion and of the reasons for it; and</li> <li>■ Supply the Secretary of State with a copy of the plan or programme concerned, and of the accompanying environmental report. (Regulation 14).</li> </ul>	
<b>Taking the environmental report and the results of the consultations into account in decision-making (Regulation 16):</b>	
<p><b>Provision of information on the decision:</b></p> <p>As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall:</p> <ul style="list-style-type: none"> <li>■ publish the plan or programme, as adopted, its accompanying environmental report and a statement containing the particulars specified in paragraph (4) (“the relevant adoption documents”) on a public website at which the documents may be viewed and downloaded free of charge;</li> <li>■ provide a copy of the relevant adoption documents by email to any person who requests a copy, as soon as reasonably practicable after receipt of that person’s request;</li> <li>■ provide one copy of the relevant adoption documents by post to any person who requests a copy, as soon as reasonably practicable after receipt of that person’s request, unless it is not reasonably</li> </ul>	To be addressed after the Local Plan is adopted.



SEA Regulation Requirements	Where Covered in this SA Report
<p>practicable to provide a copy by post for reasons connected to the effects of coronavirus, including restrictions on movement;</p> <ul style="list-style-type: none"> <li>■ make available a telephone number for the public to make enquiries in relation to the relevant adoption documents.</li> </ul>	
<p>As soon as reasonably practicable after the adoption of a plan or programme the responsible authority shall inform (i) the consultation bodies; (ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and (iii) where the responsible authority is not the Secretary of state, the Secretary of State, that the plan or programme has been adopted, and a statement containing the following particulars:</p> <ul style="list-style-type: none"> <li>■ How environmental considerations have been integrated into the plan or programme;</li> <li>■ How the environmental report has been taken into account;</li> <li>■ How opinions expressed in response to: (i) the invitation in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;</li> <li>■ How the results of any consultations entered into under regulation 14(4) have been taken into account;</li> <li>■ The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>■ The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.</li> </ul>	<p>To be addressed after the Local Plan is adopted.</p>
<p><b>Monitoring</b></p> <p>The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.</p>	<p>To be addressed after the Local Plan is adopted.</p>

**1.20** This section has introduced the SA process for the Hertsmere Local Plan. The remainder of the report is structured into the following sections:

- **Chapter 2: Methodology** describes the approach that is being taken to the SA of the Local Plan.
- **Chapter 3: Sustainability Context for Development in Hertsmere** describes the relationship between the Hertsmere Local Plan and other relevant plans, policies and programmes; summarises the social, economic and environmental characteristics of the district and identifies the key sustainability issues.
- **Chapter 4: Sustainability Appraisal Findings for Reasonable Alternatives** summarises the SA findings for the site options and other alternatives identified through the plan-making process.
- **Chapter 5: Sustainability Appraisal Findings for the Draft Local Plan** sets out the likely sustainability effects of the policies within the Draft Local Plan.
- **Chapter 6: Cumulative Effects of the Draft Local Plan** sets out the likely sustainability effects of the Draft Local Plan as a whole.
- **Chapter 7: Monitoring** sets out the measures envisaged to monitor the effects of the Local Plan.
- **Chapter 8: Conclusions** summarises the key findings from the SA of the potential sites for housing and employment and describes the next steps to be undertaken.

**1.21** The main body of the report is supported by a number of appendices, contained in a separate document. These are as follows:

- **Appendix A** presents the **consultation responses** that were received in relation to the SA Scoping Report and Issues and Options SA Report and explains how each one has been addressed.
- **Appendix B** sets out a reference **list of reasonable alternative sites** and which development approaches apply to these.
- **Appendix C** presents the **review of relevant plans, policies and programmes**, including updates in response to comments on the SA Scoping Report.
- **Appendix D** presents the **updated baseline information**, taking into account comments on the SA Scoping Report.
- **Appendix E** presents the **assumptions** that were applied during the appraisal of the site options.
- **Appendix F** presents the detailed **SA matrices** for potential sites for housing and employment.
- **Appendix G** presents the **historic environment appraisals** that have informed the assessments for SA Objective 7 (Historic Environment).
- **Appendix H** presents a record of **alternatives assessed at the Issues and Options stage**.
- **Appendix I** sets out the **Council's reasons for selecting the preferred options** and not taking forward reasonable alternatives to these.

## Chapter 2 Methodology

**2.1** In addition to complying with legal requirements, the approach being taken to the SA of the Hertsmere Local Plan is based on current best practice and the guidance on SA/SEA set out in the national Planning Practice Guidance, which involves carrying out SA as an integral part of the plan-making process. **Table 2.1:** sets out the main stages of the plan-making process and shows how these correspond to the SA process.

**Table 2.1: Corresponding stages in plan making and SA**

Local Plan Step 1: Evidence Gathering and Engagement
SA Stages and Tasks
<p><b>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</b></p> <p>1: Identifying other relevant policies, plans and programmes, and sustainability objectives</p> <p>2: Collecting baseline information</p> <p>3: Identifying sustainability issues and problems</p> <p>4: Developing the SA framework</p> <p>5: Consulting on the scope of the SA</p>
Local Plan Step 2: Production
SA Stages and Tasks
<p><b>Stage B: Developing and refining options and assessing effects</b></p> <p>1: Testing the Local Plan objectives against the SA framework</p> <p>2: Developing the Local Plan options</p> <p>3: Evaluating the effects of the Local Plan</p> <p>4: Considering ways of mitigating adverse effects and maximising beneficial effects</p> <p>5: Proposing measures to monitor the significant effects of implementing the Local Plan</p>
<p><b>Stage C: Preparing the Sustainability Appraisal Report</b></p> <p>1: Preparing the SA Report</p>
<p><b>Stage D: Seek representations on the Local Plan and the Sustainability Appraisal Report</b></p> <p>1: Public participation on Local Plan and the SA Report</p> <p>2(i): Appraising significant changes</p>
Local Plan Step 3: Examination

Local Plan Step 1: Evidence Gathering and Engagement
SA Stages and Tasks
2(ii): Appraising significant changes resulting from representations
Local Plan Step 4 & 5: Adoption and Monitoring
SA Stages and Tasks
3: Making decisions and providing information
<b>Stage E: Monitoring the significant effects of implementing the Local Plan</b>
1: Finalising aims and methods for monitoring
2: Responding to adverse effects

**2.2** The sections below describe the approach that has been taken to the SA of the Hertsmere Local Plan to date and provide information on the subsequent stages of the process.

## Stage A: Scoping

**2.3** The SA process began with the production of a Scoping Report for the Hertsmere Local Plan, which was prepared by LUC on behalf of Hertsmere Borough Council in September 2017.

**2.4** The Scoping stage of the SA involves understanding the social, economic and environmental baseline for the Plan area as well as the sustainability policy context and key sustainability issues. The Scoping Report presented the outputs of the following tasks:

- Policies, plans and programmes of relevance to the Local Plan were identified and the relationships between them were considered, enabling any potential synergies to be exploited and any potential inconsistencies and incompatibilities to be identified and addressed (see **Appendix C**).
- Baseline information was collected on environmental, social and economic issues in Hertsmere Borough Council. This baseline information provides the basis for predicting and monitoring the likely effects of options for policies and site allocations and helps to identify alternative ways of dealing with any adverse effects identified (see **Appendix D**).
- Key sustainability issues for Hertsmere were identified and their likely evolution without the implementation of the Local Plan was considered (see **Table 3.1**).
- A Sustainability Appraisal framework was presented, setting out the SA objectives against which options and subsequently policies would be appraised. The SA framework provides a way in which the sustainability

impacts of implementing a plan can be described, analysed and compared. It comprises a series of sustainability objectives and associated sub-questions that can be used to ‘interrogate’ options and policies drafted during the plan-making process. These SA objectives define the long-term aspirations of the district with regard to social, economic and environmental considerations. During the SA, the performances of the plan options (and later, policies) are assessed against these SA objectives and sub-questions (see **Table 2.2**).

**2.5** Public and stakeholder participation is an important part of the SA and wider plan-making processes. It helps to ensure that the SA report is robust and has due regard for all appropriate information that will support the plan in making a contribution to sustainable development. The SA Scoping Report for the Local Plan was published for consultation between September and October 2017 with the three statutory consultees (Natural England, the Environment Agency and Historic England) and a number of other stakeholders identified by the Council.

**2.6 Appendix A** sets out the comments that were received during the consultation on the SA Scoping Report and describes how each one has been addressed during the preparation of this SA Report. In light of the comments received, a number of amendments were made to the review of plans, policies and programmes, the baseline information and the key sustainability issues. The updated versions of these are presented in this document. These parts of the Scoping Report will continue to be updated as necessary at each stage of the SA process to ensure that they remain up to date and reflect the current situation in Hertsmere Borough. A number of comments received in relation to the SA Scoping Report and the SA of the Issues and Options Local Plan also related to the SA framework, which prompted a small number of minor changes to the SA framework. These are demonstrated in **Table 2.2**: with deletions from the version



presented in the SA Scoping Report shown in ~~striketrough~~ text and any additions shown as underlined text.

**2.7** The review of plans, policies and programmes and the baseline information are summarised in **Chapter 3**. The full, updated review of plans, policies and programmes and the baseline information are included in **Appendix C** and **Appendix D**. These will continue to be updated to account for any new information in future iterations of the SA.

**2.8 Table 2.2:** presents the updated SA framework for the Hertsmere Local Plan, which includes 15 SA objectives. The table also shows the appraisal questions and which SEA topics are relevant to each SA objective.

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Table 2.2: SA framework for the Hertsmere Local Plan<sup>5</sup>

SA Objective Reference	SA Objective	Appraisal Questions: Will the Plan...?	Relationship with the SEA Topics
SA Objective 1	<p><b><u>Education</u></b></p> <p>To improve access to education, training, opportunities for lifelong learning and employability.</p>	<p>Provide new and improved education facilities, which will support raising attainment and the development of skills, leading to a work ready population of school and college leavers?</p> <p>Promote the development of education services that retain young people through further and higher education in order to develop and diversify the skills needed to make Hertsmere prosper?</p> <p>Create new opportunities to improve educational attainment, qualification levels and participation in education and training through access to existing or the provision of new educational infrastructure?</p>	Population
SA Objective 2	<p><b><u>Services</u></b></p> <p>To ensure ready access to essential services and facilities<sup>6</sup> for all residents.</p>	<p>Provide new and enhance existing leisure facilities, where thresholds/standards require these?</p> <p>Create opportunities to lead healthier lifestyles, including development that enhances existing and /or makes provision for and maintenance towards open spaces, sports and recreational facilities e.g. publicly available pitches, allotments, swimming pools, courts, etc.?</p> <p>Provide new or enhanced local services to support new and growing communities?</p> <p>Provide for the specific needs of disabled and older people?</p>	Population, Human Health
SA Objective 3	<p><b><u>Housing Provision</u></b></p> <p>To ensure the provision of housing, including affordable housing and a mix that meets local needs.</p>	<p>Create developments that make significant contributions to local housing needs?</p> <p><u>Allocate sufficient sites to accommodate the objectively assessed housing need for the District, taking into account any housing need that cannot be met in neighbouring authorities, where appropriate?</u></p> <p>Provide a mix of housing suitable for a range of ages and household types, including families with children, older people, students, people with disabilities, service families,</p>	Population, Material Assets, Human Health

<sup>5</sup> Wording that has been deleted following consultation on the SA Scoping Report is shown in strikethrough text, whereas any additional wording is shown as underlined text.

<sup>6</sup> Essential services and facilities relevant to this objective include those discussed in the appraisal questions, as well as education and health facilities, which are assessed via SA Objective 1 and SA Objective 5. This objective relates to overall accessibility to a range of services and facilities, whilst SA Objectives 1 and 5 relate to health and education specifically, and will primarily be assessed through consideration of proximity and provision of facilities.

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SA Objective Reference	SA Objective	Appraisal Questions: Will the Plan...?	Relationship with the SEA Topics
		<p><u>travellers, people who rent their homes and people wishing to commission or build their own homes?</u></p> <p>Provide genuinely affordable housing?</p>	
SA Objective 4	<p><b><u>Community Cohesion</u></b></p> <p>To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.</p>	<p>Create well-designed developments with a sufficient critical mass or density to support local services and public transport provision?</p> <p>Reduce levels of crime, anti-social behaviour and the fear of crime through high quality design and intervention, i.e. street layout, public space provision, passive surveillance, lighting etc.?</p> <p>Make provision for religious places of worship in Shenley and Borehamwood?</p>	Population, Human Health
SA Objective 5	<p><b><u>Health</u></b></p> <p>To improve population's health and reduce inequalities.</p>	<p>Provide, steward and maintain green infrastructure assets and networks (including green open space and river/canal corridors), ensuring that these are linked into new and existing developments, to improve the connectivity of green space and green networks?</p> <p>Create opportunities to lead healthier lifestyles, including development that enhances existing and /or makes provision for and maintenance towards open spaces, sports and recreational facilities e.g. publicly available pitches, allotments, swimming pools, courts, etc.?</p> <p>Provide new or enhanced local health services to support new and growing communities?</p>	Population Human Health
SA Objective 6	<p><b><u>Soil and Minerals</u></b></p> <p>To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.</p>	<p>Avoid development of high quality agricultural land? Ensure the re-use and redevelopment of brownfield sites?</p> <p>Result in efficient use of recycled/secondary materials?</p> <p><u>Encourage minimisation, reuse and recycling of waste?</u></p> <p>Protect mineral resources and infrastructure?</p> <p>Ensure development avoids sterilisation of local mineral reserves?</p>	Soil
SA Objective 7	<p><b><u>Historic Environment Heritage</u></b></p> <p><del>To protect and enhance historic buildings, heritage assets and archaeological sites. To protect</del></p>	<p><del>Avoid adverse effects on</del> <u>Conserve and, where appropriate, enhance listed buildings (including locally listed buildings), conservation areas, scheduled ancient monuments, registered parks and gardens, and registered battlefields and their settings?</u></p>	Cultural Heritage, including architectural and archaeological heritage

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SA Objective Reference	SA Objective	Appraisal Questions: Will the Plan...?	Relationship with the SEA Topics
	<u>and, where appropriate, enhance heritage assets<sup>7</sup> and their settings.</u>	<p><u>Seek to understand and manage impacts on the historic environment, particularly in areas with archaeological potential?</u></p> <p>Provide appropriately-scaled, designed and landscaped developments that relate well to and enhance the historic character of the Borough and contribute positively to its distinctive sense of place?</p> <p>Promote <del>the greater understanding and</del> enhancement of the Borough's <del>archaeological resource and other aspects of heritage historic environment</del>, such as parks and open spaces, and areas with a particular <del>historical or cultural association-heritage significance</del> (e.g. historic associations etc.)?</p> <p><u>Protect archaeological and palaeoenvironmental assets (particularly organic remains) from changes in hydrological conditions and soil chemistry?</u></p> <p>Promote access to, as well as <u>the enjoyment and understanding of</u>, the local historic environment <u>(including architectural, archaeological and artistic heritage)?</u></p> <p><u>Ensure climate change mitigation and energy efficiency measures can be sensitively incorporated into the historic environment?</u></p> <p>Improve participation in cultural activities?</p> <p>Help foster heritage-led regeneration?</p> <p>Improve existing and provide new leisure, recreational, or cultural activities related to the historic environment?</p>	
SA Objective 8	<p><b><u>Landscape</u></b></p> <p>To maintain and enhance the quality of countryside and landscape.</p>	<p><del>Consider</del> Retain or enhance the existing character, form and pattern of the Borough's landscapes, buildings and settlements?</p> <p>Protect and enhance the local distinctiveness and contribution to a sense of place?</p> <p><u>Promote high quality Green Infrastructure within existing and new development?</u></p>	Landscape
SA Objective 9	<p><b><u>Greenhouse Gas Emissions</u></b></p>	<p>Ensure a complementary mix of land uses within compact communities that minimises the length of journeys to services and facilities and employment opportunities, increases</p>	Air, Climatic Factors, Human Health

<sup>7</sup> As per the NPPF (2021) heritage assets are taken to include 'A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest'. It includes designated heritage assets and assets identified by the local planning authority (including local listing).



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SA Objective Reference	SA Objective	Appraisal Questions: Will the Plan...?	Relationship with the SEA Topics
	To reduce greenhouse gas emissions, including a reduced dependence on the private car.	<p>the proportion of journeys made on foot or by cycle, and are of a sufficient density to support and enhance local services and public transport provision?</p> <p>Situate development in locations well served by public transport, cycle paths and walking routes?</p> <p>Provide new and improved sustainable transport networks, including cycle and walking routes, to encourage active travel and improve connectivity to local service centres, transport hubs, employment areas and open/green spaces?</p> <p>Improve strategic public transport infrastructure?</p> <p><u>Minimise greenhouse gas emissions from industrial and commercial activities?</u></p> <p><u>Provide roadside green infrastructure, particularly trees, which could help absorb carbon dioxide?</u></p>	
SA Objective 10	<p><b><u>Biodiversity and Geodiversity</u></b></p> <p>To protect and enhance biodiversity and geodiversity.</p>	<p>Protect and where possible enhance <u>internationally (including European sites) and nationally designated biodiversity sites and species?</u></p> <p>Avoid net loss, damage to, or fragmentation of locally designated and non-designated wildlife sites, habitats and species and encourage net gain in biodiversity?</p> <p>Enhance and increase the extent of <u>priority habitats</u> for protected species and priority species identified in the Hertfordshire BAP or the England Biodiversity Strategy 2020, <u>in support of the 25 year Environment Plan?</u></p> <p><u>Seek to secure biodiversity offsetting opportunities where appropriate?</u></p> <p><u>Connect people with the environment to improve health and wellbeing by promoting the importance of biodiversity and increase opportunities for people to come into contact with resilient wildlife places while encouraging respect for and raising awareness of the sensitivity of these sites and species?</u></p> <p>Integrate <u>locally distinctive, biodiverse habitats</u> into new developments, as well as contribute to improvements in ecological connectivity and ecological resilience <u>within and between</u> <del>in</del> rural and urban areas?</p> <p>Maintain and enhance <u>ecosystem services and ecological networks</u> in the Borough?</p> <p>Protect sites valued for their geological characteristics?</p>	Biodiversity, Fauna, Flora

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SA Objective Reference	SA Objective	Appraisal Questions: Will the Plan...?	Relationship with the SEA Topics
		<p><b>NB</b> Climate change is likely to impact upon habitats <del>and species and thereby biodiversity</del>. Plan policies that achieve the goals listed above should all help to <del>enhance</del> <u>enable</u> the ability of wildlife to adapt to a changing climate.</p>	
SA Objective 11	<p><b><u>Water Quality and Quantity</u></b> To improve water quality and manage water sources sustainably.</p>	<p>Ensure that development does not lead to the deterioration of groundwater, surface water or river water quality?</p> <p>Locate development where adequate foul drainage, sewage treatment facilities, <u>adequate potable water supply</u> and surface water drainage can be made available?</p> <p>Incorporate SUDS (including their long-term maintenance) into development, so as to reduce the rate of run-off and the risk of surface water flooding and combined sewer overflow?</p> <p>Increase water efficiency, particularly in new developments?</p>	Water, Biodiversity, Fauna, Flora
SA Objective 12	<p><b><u>Flooding</u></b> To minimise the risk of flooding taking account of climate change.</p>	<p>Avoid development in locations at risk from flooding or which could increase the risk of flooding elsewhere, taking into account the impacts of climate change?</p> <p>Create development that incorporate SUDS (including their long-term maintenance) to reduce the rate of run-off and the risk of surface water flooding and combined sewer overflows?</p>	Water, Climatic Factors, Human Health
SA Objective 13	<p><b><u>Air Quality</u></b> To improve local air quality.</p>	<p><u>Minimise the number of vehicles travelling to, from and through the Borough's AQMAs?</u></p> <p>Situate development in locations well served by public transport, cycle paths and walking routes in order to reduce emissions?</p> <p>Situate developments within walking distance to essential services and facilities?</p> <p>Make provision for new and improved sustainable transport networks, including cycling and walking routes?</p> <p><u>Minimise emissions of air pollutants from industrial activities?</u></p> <p><u>Provide roadside green infrastructure, particularly trees, which could help absorb air pollutants?</u></p>	Air, Human Health

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SA Objective Reference	SA Objective	Appraisal Questions: Will the Plan...?	Relationship with the SEA Topics
SA Objective 14	<p><b><u>Energy Efficiency</u></b></p> <p>To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.</p>	<p>Create strategic-scale developments that make significant and lasting contributions to the UK's national carbon target of reducing emissions by at least 80% from 1990 levels by 2050?</p> <p>Create connected energy networks that provide local low carbon and renewable electricity and heat?</p>	Climatic Factors
SA Objective 15	<p><b><u>Economy</u></b></p> <p>Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.</p>	<p>Improve access to jobs for local people from all sectors of the community that will reduce inequality between standards of living?</p> <p>Enhance the vitality and vibrancy of town centres?</p> <p>Provide high quality employment sites and associated infrastructure suitable for the likely continuation in a shift from manufacturing to higher skill, service industries?</p>	Population, Material Assets

**2.9** The SA framework is designed to strike a balance between providing sufficient detail to identify key effects, whilst keeping analysis at a strategic level. Many of the objectives are cross-cutting, as they relate to a number of SEA topics. In order to avoid repetition and to ensure assessments are effective and useful in decision-making, each SA objective is considered individually. For example, SA Objective 3 (Housing Provision) relates to provision of suitable homes, including affordable housing. Provision of housing is not a sustainability issue in its own right, but is important in ensuring people have a suitable place to live, which in turn benefits the health and wellbeing of residents and their economic productivity, among other social and economic benefits. As such, these factors are not repeated in the assessment of other SA objectives.

## SA Stage B: Developing and Refining Options and Assessing Effects

**2.10** Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the SA help to identify where there may be 'reasonable alternatives' to the options being considered for a plan.

**2.11** Regulation 12 (2) of the SEA Regulations requires that:

"The (environmental or SA) report must identify, describe and evaluate the likely significant effects on the environment of—

- (a) implementing the plan or programme; and
- (b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme."

**2.12** Any alternatives considered for the plan need to be 'reasonable'. This implies that alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g. the National Planning Policy Framework) or site options that are unavailable or undeliverable.

**2.13** The SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Indeed, there will often be an equal number of positive and negative effects identified for each option, making it impossible to 'rank' them based on sustainability performance. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for the plan.

**2.14** This section provides an overview of how the appraisal of options has been undertaken and how this will feed into the development of the Hertsmere Local Plan.

## Identification and Appraisal of Options

**2.15** The Council's starting point for identifying Issues and Options in the Borough was the objectively assessed need for new homes and jobs. The current local plan does not identify land to meet the full housing need to 2027 (as identified through new joint evidence studies with neighbouring councils), because of its focus on protecting the Green Belt and a lower level of objectively assessed housing need, which derived in part from the former Regional Spatial Strategy for the area. As a result, the consideration of issues and options stemmed from addressing this shortfall of housing and employment sites and identifying the best and most sustainable approaches to delivering the additional number of homes and jobs needed in Hertsmere.

**2.16** The Council sent a 'Planning for Growth' newsletter to all homes in the Borough at the end of 2016. The letter asked residents for their views on how best to plan for new homes, jobs and infrastructure. This was followed up by presentations to groups of local people, the business community and developers, and a survey of questions about the number of new homes, jobs and local services that should be provided.

## Issues and Options Local Plan

**2.17** Responses to the engagement opportunities described above fed into identifying the issues and options presented in the Issues and Options report (September 2017). This set out a draft vision and priorities for the Local Plan, identified strategic planning issues in the borough and sought views on a range of issues, such as housing and employment need, community facilities and sustainable transport. The Issues and Options Local Plan document also set out five potential development approaches for the broad spatial distribution of development. All options presented were subject to the SA, which was published for consultation in February 2018. Some parts of the document, consisting of open-ended questions, were not subject to SA as they didn't present any particular options.

**2.18** A number of comments were received in response to this consultation. A summary of these comments and how they have been addressed is set out in **Appendix A**.

**2.19** The results of public consultation and the SA, among other factors, fed into the next stages of Local Plan preparation.

## Potential Sites for Housing and Employment

**2.20** Potential strategic sites for housing and employment considered for inclusion in the Hertsmere Local Plan were subject to SA, which was published for consultation in October 2018. The potential strategic sites for housing each fall within the five potential development approaches presented in the



Issues and Options report. These site options were identified through the following:

- A call for sites exercise.
- Responses to the Issues and Options consultation.
- Sites allocated in the Elstree Way Corridor Area Action Plan.
- Council owned assets.

**2.21** A number of comments were received in response to this consultation. These comments and how the SA has responded to them are summarised in **Appendix A**. These assessments of these site options are included in **Appendix F** and summarised in **Chapter 4**, if they are still considered to be reasonable alternatives.

### Draft Local Plan

**2.22** This SA Report presents the assessment of draft policies and preferred sites for housing and employment, including strategic and non-strategic sites, for inclusion in the Hertsmere Local Plan, along with reasonable alternatives to these. Reasonable alternative sites were identified through the points set out under 'Potential Sites for Housing and Employment' above. The Council's reasons for selecting the preferred options in light of the reasonable alternatives are set out in **Appendix I**.

## SA Stage C: Preparing the SA Report

**2.23** This SA Report describes the process that has been undertaken to date in carrying out the SA of Hertsmere Local Plan. It contains an assessment of the draft policies and potential sites for housing and employment (including both strategic and non-strategic sites) being considered for inclusion in the Hertsmere Local Plan, as well as the contents of the Draft Local Plan, highlighting any likely significant effects (both positive and negative, and taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects).

## SA Stage D: Consultation on Local Plan and this SA Report

**2.24** Hertsmere Borough Council is inviting comments on the Draft Local Plan (September 2021) and this SA Report. These documents are being published on the Council's website for consultation from 11<sup>th</sup> October 2021.

**2.25** **Appendix A** presents the consultation comments that were received in relation to previous SA work and explains how they have been addressed. Information about the consultation responses received in relation to this SA Report

and how they have been addressed will be provided in the next iteration of the SA Report to be prepared.

## SA Stage E: Monitoring Implementation of the Local Plan

**2.26** **Chapter 7** sets out suggested monitoring measures for potential negative effects that could arise as a result of the Local Plan.

## Appraisal Methodology

**2.27** The site options and Draft Local Plan have been appraised against the SA objectives in the SA framework (see **Table 2.2**: earlier in this section), with scores being attributed to each option to indicate its likely sustainability effects on each objective as follows:

**Table 2.3: Key to symbols and colour coding used in the SA of Hertsmere's Local Plan**

++	The option is likely to have a significant positive effect on the SA objective(s).
++/-	The option is likely to have a mixture of significant positive and minor negative effects on the SA objective(s).
+	The option is likely to have a minor positive effect on the SA objective(s).
0	The option is likely to have a negligible or no effect on the SA objective(s).
-	The option is likely to have a minor negative effect on the SA objective(s).
-/+	The option is likely to have a mixture of significant negative and minor positive effects on the SA objective(s).
--	The option is likely to have a significant negative effect on the SA objective(s).
?	It is uncertain what effect the option will have on the SA objective(s).
+/- or +/-	The option is likely to have an equal mixture of both minor or both significant positive and negative effects on the SA objective(s).

**2.28** Where a potential positive or negative effect is uncertain, a question mark was added to the relevant score (e.g. +? or -?) and the score is colour coded as per the potential positive, negligible or negative score (e.g. green, yellow, orange, etc.).

**2.29** The plan may affect certain objectives to different degrees, i.e. the magnitude of effects will differ. As the

purpose of SA is to identify likely significant effects, the scores (as shown in **Table 2.3:**) only indicate whether an effect is positive or negative (and/or uncertain) and whether it is minor or significant. Differences in the magnitude of similar effects are discussed in the assessment text, where relevant.

**2.30** The likely effects of options need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. This appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option on the SA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, scores are somewhat relative to the scale of proposals under consideration.

**2.31** SA inevitably relies on an element of subjective judgement. However, in order to ensure consistency in the appraisal of the site options, a detailed set of assumptions was developed and applied. These assumptions are presented in **Appendix E** and were applied mainly through the use of Geographical Information Systems (GIS) data.

**2.32** The assumptions were updated following the SA of the Issues and Options, in order to inform the SA of options presented in the following SA Reports (including this document). This is because the Council clarified that it can only be confident that some aspects of infrastructure provision would be delivered on larger sites. Changes in assumptions are specific to site appraisals, rather than general development approaches. This means that the assessments presented in the SA of the Issues and Options did not require any changes to be made in light of the updated assumptions.

**2.33** Following the Potential Sites for Housing and Employment consultation (2018) further changes were made to the assumptions for two reasons:

- In order to address gaps in the assumptions that did not come to light until non-strategic sites were being assessed. For SA Objective 8 (Landscape), this included the need to assess changes to townscape in urban areas, as these are not covered by the Landscape Character Assessment.
- Additional information coming to light, in particular, school capacity information to inform SA Objective 1 (Education).

**2.34** In addition, footnotes have been added to clarify additional assessment requirements for some objectives, at the request of the Council.

**2.35** Whilst these changes affected primarily the non-strategic sites, which were not assessed in previous rounds of SA, the strategic sites considered in the Potential Sites for Housing and Employment consultation (2018) have been reassessed in line with these updated assumptions and the results are presented in **Appendix F**.

**2.36** Assessments of housing and employment options have been carried out on the basis of their red line boundary and taking into account any infrastructure provision requirements set out in **Table 2.4:**. Assessments have followed the precautionary principle, in that a maximum case (or 'worst-case') scenario is assumed. This allows the SA to identify all potential effects that could occur as a result of development at a particular site and, in line with the PPG, focus on those effects that are likely to be significant.

### Approach to Mitigation

**2.37** It may be possible to mitigate many of the negative effects identified. For example, preservation of those elements of the heritage assets' setting that contributes to its significance, or the understanding of that significance, through the careful siting and design of development, could mitigate negative effects on the historic environment. However, it cannot be known what measures will be brought forward, such as siting, layout and design of development, at any particular site. In order to ensure assessments are comparable between all options, potential mitigation measures have not been taken into account in the assessments presented in **Appendices F and G**. Where negative effects have been identified, an overview of potential mitigation measures is set out in **Chapter 4** and **Chapter 6**.

### Approach to Infrastructure Provision

**2.38** It has been assumed that, in line with sub-regional requirements, appropriate health and education infrastructure will be provided to meet the needs of new development. Hertsmere Borough Council has identified potential, appropriate locations for these. However, when assessing site options there was uncertainty regard the exact locations in which such infrastructure will be provided, as this also requires input from the clinical commissioning group (CCG) and Hertfordshire County Council. In addition, whilst sufficient capacity may be provided to serve development, there is uncertainty as to whether this will be provided in locations that are easily accessible to all new housing development. As such, the assessment of site options has not made any assumptions as to the location of new facilities and has been carried out with reference to the location of existing facilities. This will help the relevant authorities identify where additional capacity or new facilities may be best located.

**2.39** The Issues and Options document describes the infrastructure each potential development approach would be

**2.40** expected to provide. This information has been set out in **Table 2.4:** for reference and has been taken into account in the assessments of strategic site options presented in this report. The Council only associated strategic sites with these development approaches and the infrastructure assumptions

set out in **Table 2.4:**. As such, no infrastructure assumptions have been made for non-strategic sites and these have been assessed on the basis of their red line boundaries only. It has been assumed that the provision of any new infrastructure would be of a sufficient scale and appropriately located to meet the needs of the new development.

**Table 2.4: Infrastructure requirements for the development approaches, based on those set out in the Hertsmere Local Plan Issues and Options document (2017)<sup>8</sup>**

Development Approach	Required Infrastructure
Redevelopment of urban brownfield sites.	<ul style="list-style-type: none"> <li>New education facility (if providing 500 homes or more).</li> <li>Additional healthcare provision.</li> <li>Improved pedestrian/cycle connectivity.</li> <li>Improvements to bus services within and between towns.</li> <li>Local highway network improvements and more electric charging points.</li> <li>Potential improvements to the wider strategic highway network.</li> <li>Open space, leisure, recreation and community facilities.</li> <li>Enhanced green infrastructure within new developments (including parks, greenspaces and other natural features).</li> <li>High speed broadband network improvements.</li> <li>New local centre (if providing 500 homes or more).</li> <li>New employment provision (if providing 750 homes or more).</li> </ul>
Growth through new garden suburbs.	<ul style="list-style-type: none"> <li>New education facility (if providing 500 homes or more).</li> <li>Additional healthcare provision.</li> <li>Policy compliant number of affordable homes.</li> <li>Strategic pedestrian/cycle connectivity.</li> <li>Improvements to inter-urban bus services.</li> <li>Local highway network improvements.</li> <li>Potential improvements to the wider strategic highway network.</li> <li>New local centre (if providing 500 homes or more).</li> <li>Open space, leisure, recreation and community facilities.</li> <li>Enhanced green infrastructure network (including parks, green spaces and other natural features).</li> <li>New employment provision (if providing 750 homes or more).</li> </ul>
Supporting larger rural communities and growth of key villages.	<ul style="list-style-type: none"> <li>New education facility (if providing 500 homes or more).</li> <li>Additional healthcare provision.</li> <li>Policy compliant number of affordable homes.</li> <li>Strategic pedestrian/cycle connectivity.</li> <li>Improvements to inter-urban bus services.</li> </ul>

<sup>8</sup> Updates have been made where the Council has clarified that some aspects of infrastructure provision will only be provided on larger sites.

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Development Approach	Required Infrastructure
	<p>Local highway network improvements.</p> <p>Potential improvements to the wider strategic highway network.</p> <p>New local centre (if providing 500 homes or more).</p> <p>Open space, leisure, recreation and community facilities.</p> <p>Enhanced green infrastructure network (including parks, green spaces and other natural features).</p> <p>High speed broadband network improvements.</p> <p>New employment provision (if providing 750 homes or more).</p>
Meeting the needs of other villages.	<p>New education facility (if providing 500 homes or more).</p> <p>Additional healthcare provision.</p> <p>Policy compliant number of affordable homes.</p> <p>Strategic pedestrian/cycle connectivity.</p> <p>Improvements to bus services.</p> <p>Local highway network improvements.</p> <p>Potential improvements to the wider strategic highway network.</p> <p>New local centre (if providing 500 homes or more).</p> <p>Open space, leisure, recreation and community facilities.</p> <p>Enhanced green infrastructure network (including parks, green spaces and other natural features).</p> <p>High speed broadband network improvements.</p>
New garden village.	<p>New education facility (if providing 500 homes or more)</p> <p>New healthcare provision.</p> <p>Policy compliant number of affordable homes.</p> <p>New pedestrian and cycle routes.</p> <p>Bus routes with possible guided busways to connect with other town centres.</p> <p>Local highway network improvements.</p> <p>Detailed investigations, including the modelling of the motorway junction capacity and the surrounding strategic road network.</p> <p>New local centre (if providing 500 homes or more).</p> <p>Open space, leisure and sports facilities.</p> <p>Enhanced green infrastructure network (including parks, green spaces and other natural features).</p> <p>High speed broadband network improvements.</p> <p>New employment provision (if providing 750 homes or more).</p>

## Difficulties Encountered and Limitations

### Approach to Assessing Cross-boundary Effects

**2.41** It is acknowledged that sustainability effects do not have regard to administrative boundaries. As such, development within Hertsmere could have effects beyond the borough boundary. When assessing site allocation options, the SA has effectively ignored the borough boundary and applied the same assumptions to each site, regardless of its proximity to a boundary, as far as possible.

**2.42** However, there are some limitations to this approach in terms of data availability. Some of the data required to apply the assumptions for site assessments (**Appendix E**) was not available to LUC for areas outside of Hertsmere. In some cases, this is because it relates to locally-specific datasets that do not extend beyond the borough boundary (such as the Landscape Sensitivity Assessment) and in other cases it is because data is held locally by borough/district authorities and therefore we have only been able to obtain the data held by Hertsmere Borough Council. Some datasets were acquired on a Hertfordshire-wide basis, therefore data is available for neighbouring authorities within Hertfordshire, but not others.

**2.43** LUC did not have access to the following GIS data outside the Hertsmere Borough boundary for all adjoining local authorities (including those in Hertfordshire):

- Accessibility ratings.
- Town and local centres.
- Local green/open space.
- Mineral Consultation Areas.
- Locally listed buildings.
- Archaeological sites.
- Conservation areas.
- HER data.
- Landscape character areas/landscape sensitivity.
- RIGS.
- Employment sites.

**2.44** In addition, LUC did not have access to the following GIS data for the adjoining local authority areas outside of Hertfordshire:

- Education facilities.
- Doctor's surgeries.
- Rights of way.
- Waste sites/anaerobic digestion plants.
- Regional cycle routes.
- Wildlife trust reserves.
- Wildlife sites/ecosites.

**2.45** In most cases, this lack of information means that assessments are potentially more precautionary. This is because the assessment may not recognise that a

development is close to a service, facility or amenity that new residents could benefit from, such as local green space, or a doctors' surgery. In some cases, the lack of information may mean that an adverse effect is not recorded when one could arise due to the presence of designated assets. This is only relevant to site options near the boundary of the Borough. The potential for such effects should be recognised and explored at the planning application stage. However, these effects are very unlikely to be significant because:

- There are no identified data gaps for nationally and internationally designated assets.
- Significant effects are most likely to arise when an asset lies within or immediately adjacent to the development site boundary.

**2.46** The assessment of cumulative effects (**Chapter 6**) takes into account major development proposals included in Local Plans of neighbouring local authorities.

**2.47** It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SA process.

**2.48** The high-level nature of the spatial distribution options assessed at the Issues and Options stage, meant that at times it was difficult to assess in detail the likely effects of the options on each SA objective.

**2.49** The options for different housing quanta are not associated with any particular spatial pattern or location of development. As such, it was difficult to assess these figures against the baseline as spatial implications of each are unknown. As such, whilst the SA generally assesses each option individually against the baseline, the assessments of these options are necessarily comparative to an extent. The SA also took into account the source of the different housing quanta options, i.e. how they were generated through the Strategic Housing Market Assessment (SHMA). For example, the economic-led growth scenario is expected to have more positive effects on SA Objective 15 (Economy) than the other scenarios, as it would be expected to provide housing at a level that supports and promotes economic growth.

**2.50** There was a need to ensure that a large number of site options could be appraised consistently. This was achieved by the use of assumptions relating to each SA objective, as described above.

**2.51** The assumptions are presented in **Appendix E** and include a range of distance thresholds. These are based on the suggested acceptable walking distances presented in Guidelines for Providing for Journeys on Foot (The Institution of Highways and Transportation, 2000). It cannot be known which route people will take and this is likely to vary depending on the starting point of each individual's journey.



Therefore, for consistency, these thresholds will use straight line measurements from the boundary of a site.

**2.52** Difficulties and limitations relating to specific SA objectives are detailed below.

### SA Objective 1: Education

**2.53** When considering proximity of site allocation options to existing schools, only state schools are considered. This is because these schools are open to all and it is expected the majority of school age residents will attend state schools. In addition, local catchments may not apply to independent schools, for which pupils will often travel further. Where independent or specialist schools are near a site, these have been noted but have not influenced the score.

**2.54** School capacity information was only available on a settlement-wide basis, therefore there may be known capacity in schools in the settlement as a whole, but it is not known whether each individual school has capacity to accept new pupils.

### SA Objective 5: Health

**2.55** When considering proximity of site allocation options to health facilities, only NHS facilities are considered. This is because these are the facilities most likely to be used by local residents.

### SA Objective 7: Historic Environment

**2.56** With regards to assessment of the historic environment (SA Objective 7), due to the absence of detailed information on the significance and sensitivity of assets and the way their setting contributes to their significance, as well as the lack of information regarding development proposals, and the probable magnitude of effect, a certain level of uncertainty is attached to every historic environment SA effect. In light of the absence of detailed information, a maximum case scenario is generally assumed; however, mitigation by design and additional mitigation measures may help reduce some effects. The high-level assessment provided herein is indicative only, and more detailed assessment of the effects on the historic environment should be undertaken as part of the planning process.

**2.57** Information regarding undesignated historic environment assets was obtained from the Hertfordshire Historic Environment Record in November 2019. This resource should hold the most up to date records at the time of assessment. There could be undiscovered archaeological features at any location within the Borough. For the purposes

of this SA, we have focused on assessing the likely effects of development on known archaeological sites, but further archaeological work may be necessary prior to any development in order to avoid loss of archaeological resources.

**2.58** Where setting change is noted for heritage assets, unless otherwise stated, it is considered likely that this would be harmful due to an effect on the significance of the asset and/or the way it is perceived. In preparing this SA it has not been possible to access information regarding contaminated land in the Borough. However, it has been assumed that any contamination present can and will be remediated to safe levels prior to development of any site. If this is not possible, it has been assumed that the Council would not consider such sites to be reasonable options for development.

### SA Objective 8: Landscape

**2.59** Landscape sensitivity work has been commissioned but was not available at the time of preparing site assessments. As such, the Hertfordshire Landscape Character Assessment<sup>9</sup> was used and a high-level, desk-based assessment of townscape.

### SA Objective 9: Greenhouse Gas Emissions

**2.60** It is acknowledged that not all greenhouse gas emissions arise as a result of transport, although over half of the CO<sub>2</sub> emissions in Hertsmere are from transport. When assessing potential site allocations, the primary measurement of the impact of that site on greenhouse gas emissions is whether it will reduce car travel, therefore the assumptions focus on proximity to sustainable transport links. Whilst it is acknowledged that the presence of sustainable transport links will not necessarily result in all residents using them, it is expected that more people will travel by sustainable transport than in other locations. It is likely that emissions of greenhouse gases from vehicles will decrease over the plan period, given the phasing out for petrol and diesel cars, as well as changes in working patterns, such as an increase in working from home following the Covid-19 pandemic. The rate at which emissions from private vehicles will change over the course of the plan period as a result of technological improvements cannot be predicted or realistically factored into judgements about greenhouse gas emissions.

**2.61** It is noted that larger sites may have more potential to incorporate renewable energy production. This is more likely to be a requirement for larger development sites and may be more viable on larger sites, therefore uncertainty (?) has been

<sup>9</sup> <https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/landscape/landscape-character-assessment.aspx>



added to effects for strategic sites, to recognise this potential (this also applies to SA Objective 14 (Energy Efficiency)).

**2.62** The development itself will have energy demands, resulting in greenhouse gas emissions, depending on the nature and size of development, but the location of the site is a negligible factor in this.

### Objective 13: Air Quality

**2.63** It is likely that emissions of air pollution from vehicles will decrease over the plan period, given the phasing out for petrol and diesel cars, as well as changes in working patterns, such as an increase in working from home following the Covid-19 pandemic. The rate at which emissions from private vehicles will change over the course of the plan period as a result of technological improvements cannot be predicted or realistically factored into judgements about air quality. Note that particulate pollution (PM<sub>10</sub> and PM<sub>2.5</sub>) results partly from tyre wear, which will not be affected by a move to electric or alternative fuels.

### SA Objective 10: Biodiversity and Geodiversity

**2.64** LUC received a GIS shapefile showing 'ecosites' in the Borough and used these to inform assessments against this SA objective. Hertfordshire County Council clarified that these are sites that the Hertfordshire Environmental Records Centre (HERC) have some ecological information on, thus they are known to support some wildlife interest, at least at a local level. However, their biodiversity value may vary and they do not meet the criteria to be designated as Local Wildlife Sites (LWS'). In addition, the boundaries of these sites can be inaccurate or vague. As such, the SA recognises uncertainty (?) alongside any positive or negative effects expected to occur on these sites.

## Chapter 3

# Sustainability Context for Development in Hertsmere

### Review of Plans, Policies and Programmes

**3.1** The Hertsmere Local Plan is not prepared in isolation, being greatly influenced by other plans, policies and programmes and by broader sustainability objectives. It must be consistent with international and national guidance and strategic planning policies and should contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture and the historic environment. It must also conform to environmental protection legislation and the sustainability objectives established at an international, national and regional level.

**3.2** During the Scoping stage of the SA, a review was undertaken of the other plans, policies and programmes that are relevant to the Local Plan. The key findings are summarised below and the full, updated review can be found in **Appendix D**.

**3.3** Schedule 2 of the SEA Regulations requires the SA to provide:

- (a) “an outline of the...relationship with other relevant plans or programmes”; and
- (e) “the environmental protection objectives established at international, Community or national level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation”.

**3.4** It is therefore necessary to identify the relationships between the Hertsmere Local Plan and the relevant plans, policies and programmes so that any potential links can be built upon and any inconsistencies and constraints addressed.

#### Key International Plans, Policies and Programmes

**3.5** At the international level, there is a wide range of plans and programmes which act to inform and shape national level legislation. Planning policy in England at a national and local level (i.e. the NPPF<sup>10</sup> and Local Plans) should be aware of and in conformity with the relevant legislation.

**3.6** Although the requirements for SA and HRA originate from EU Directives, the UK left the EU in January 2020 and the

<sup>10</sup> Ministry of Housing, Communities and Local Government (July 2021). National Planning Policy Framework. Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

transition period ended at the end of 2020. Following the end of the transition period, most EU law continues to apply as a result of provisions in the European Union (Withdrawal) Act 2018 (EUWA) and the 'EU Exit' amendments to domestic legislation, although the UK is no longer bound by judgements of the Court of Justice of the European Union.

**3.7** The UK remains part of a number of international treaties, many of which relate to environmental protection, particularly in terms of biodiversity protection and climate change. This includes the Bern Convention (1979) and International Convention on Biological Diversity (1992), which seek to ensure international co-operation to conserve species in their natural habitats. In addition, international agreements, such as the 2015 Paris Agreement address, minimising carbon emissions and global warming. Also of relevance is the Aarhus Convention (1998), which seeks to enable public participation in decision-making and the Johannesburg Declaration (2002), which sets an international framework for sustainable development.

### Key National Plans, Policies and Programmes

**3.8** Arguably the most significant national policy context for the Hertsme Local Plan is the National Planning Policy Framework (NPPF), which was first published in 2012. The Local Plan must be consistent with the requirements of the NPPF, which was updated and revised in 2018 and 2019 and again in 2021<sup>11</sup>. The NPPF sets out information about the purposes of local plan-making, stating that:

“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”

**3.9** The NPPF requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver sufficient provision for:

- Housing (including affordable housing), employment, retail, leisure and other commercial development;
- Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

- Community facilities (such as health, education and cultural infrastructure); and
- Conservation and enhancement of the natural, built and historic environment, including landscapes, green infrastructure, and planning measures to address climate change mitigation and adaptation.

**3.10** In addition, Local Plans should:

- Be prepared with the objective of contributing to the achievement of sustainable development.
- Be prepared positively, in a way that is aspirational but deliverable.
- Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.
- Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.
- Be accessible through the use of digital tools to assist public involvement and policy presentation.
- Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area.

### Neighbouring Local Plans

**3.11** Throughout the preparation of the Local Plan and the SA process, consideration will be given to the local plans being prepared by the authorities around Hertsme. The development proposed in those authorities could give rise to in-combination effects with the effects of the Hertsme Local Plan, and the effects of the various plans may travel across local authority boundaries. There are seven authorities that border Hertsme: the London Boroughs of Barnet, Harrow and Enfield as well as Welwyn Hatfield, Three Rivers, Watford and St Albans Councils. In addition, Hertfordshire County Council has responsibility for waste and minerals planning in the area.

### Baseline Information

**3.12** Baseline information provides the context for assessing the sustainability of proposals in the Hertsme Local Plan and it provides the basis for identifying trends, predicting the likely effects of the plan and monitoring its outcomes. The requirements for baseline data vary widely, but it must be relevant to environmental, social and economic issues, be

<sup>11</sup> Ministry of Housing, Communities and Local Government (July 2021). National Planning Policy Framework. Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

sensitive to change and should ideally relate to records which are sufficient to identify trends.

**3.13** Schedule 2 of the SEA Regulations requires data to be gathered on biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between the above factors. As an integrated SA and SEA is being carried out, baseline information relating to other sustainability topics has also been included; for example information about housing, education, transport, energy, waste and economic growth. This information was originally presented in the September 2017 Scoping Report and an updated version has been included in **Appendix D**.

## Key Sustainability Issues

**3.14** A set of key sustainability issues for Hertsmere was identified during the Scoping stage of the SA and was presented in the Scoping Report.

**3.15** Identification of the key sustainability issues and consideration of how these issues might develop over time if the Local Plan is not prepared, help meet the requirements of Schedule 2 of the SEA Regulations to provide information on the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme. **Table 3.1:** overleaf describes the likely evolution of each key sustainability issue if the Local Plan were not to be adopted. Note that this has been amended slightly since it was originally presented in the SA Scoping Report in response to consultation comments received on the SA Scoping Report and updates to baseline information.

**3.16** The information in **Table 3.1:** shows that, in general, the current trends in relation to the various social, economic and environmental issues affecting Hertsmere would be more likely to continue without the implementation of the Local Plan. In addition, it is likely that policy changes and updates to housing need calculations will mean that the housing provision in the current local plan no longer reflects local housing needs. This could result in development outside of the current Local Plan and/or a lack of suitable and sustainable development. In most cases, the emerging Local Plan offers opportunities to affect existing trends directly and strongly in a positive way, through an up-to-date plan that reflects the requirements of the NPPF.

## Covid-19

**3.17** On 11 March 2020, the World Health Organisation announced that they had declared the coronavirus known as Covid-19 as a global pandemic.

**3.18** The effects of the pandemic in the medium to long-term, and particularly over the full extent of the plan period, are unknown. Much depends upon the evolution of the virus, and vaccination programmes across the globe.

**3.19** In the short-term, the impacts have been profound and possibly unprecedented for at least a century. Apart from the impacts on death rates and people's health (particularly older members of the community, those with pre-existing conditions, and certain sectors of the population), the indirect impacts on sectors of the economy have been massive.

**3.20** From a planning perspective, the pandemic has brought to light the importance of healthy living environments, access to nature and outdoor space, the ability to exercise, and the impact of noise and pollution. There has been a significant impact on city and town centres (including 'the high street'), as people have switched to online shopping and restrictions have been placed on restaurants, bars and other social activities. Many more people are now working from home, and much fewer people are using public transport.

**3.21** Whether these trends continue, or whether they have simply speeded up trends that were already happening, is difficult to predict. However, it has provided planners with renewed food for thought and increased emphasis on the role of town centres and the high street, the use of the car and alternative modes of transport, the need to provide for both informal and formal recreation, and the design of healthy places in which to live and work.

# DRAFT

**Table 3.1: Key sustainability issues for Hertsmere and likely evolution without the Local Plan**

Key Sustainability Issues	Likely Evolution without Implementation of the Local Plan
<p><b>Housing Provision (Supply)</b> – There is a need to ensure sufficient land is available to meet future housing need within Hertsmere.</p>	<p>Policy CS1 of the Core Strategy states that the Council will make provision for at least 3,990 additional dwellings within the Borough between 2012 and 2027, at a development rate of a minimum of 266 dwellings per year. The Site Allocations and Development Management Policies Plan (SADMPP) (2016) demonstrates a supply of 4,177 dwellings between 2012 and 2027, averaging 278.5 dwellings per year and allocates specific sites for development through Policy SADM1.</p> <p>The NPPF of February 2019 introduced a new Standard Model for assessing local housing need. It draws on 2014-based household projections and increases the local housing need based on local affordability. The average workplace-based mean affordability ratio in the HMA is 13.9, which requires an average uplift of 61% on previous projections. This means the latest local housing need projection for Hertsmere has increased from 444 dwellings per annum (assessed in 2014) to a minimum of 717 dwellings per annum between 2020 and 2030.</p> <p>Without the emerging Local Plan, there may be a shortfall in appropriate housing and an increased risk of speculative and piecemeal windfall developments, including permitted development conversion schemes.</p>
<p><b>Housing Provision (Affordable Housing)</b> – There is a need for affordable housing across Hertsmere due to the fact that average house prices are above regional and national averages.</p>	<p>Policy CS4 of the Core Strategy states that developments of 5 self-contained residential units or more (gross), or residential sites of more than 0.2 hectares, should make provision for 35-40% Affordable Housing dependent upon post codes area.</p> <p>The South West Hertfordshire Local Housing Needs Assessment found Hertsmere requires 356 affordable rental dwellings per year, and 147 affordable homes for ownership per year, which together make up over half of the identified housing need.</p> <p>Without the emerging Local Plan, there would be a shortfall in affordable housing with many of the windfall developments coming forward, including permitted development conversion schemes, failing to deliver on-site affordable homes.</p>
<p><b>Housing Provision (Mix)</b> – There is the need for a mix of housing types including one to three bedroom houses.</p>	<p>Policy CS7 of the Core Strategy states that housing developments in excess of 10 units (gross) are required to contain some variation within their housing mix, with sites over 25 units or 1 hectare reflecting identified variations within the Borough’s housing need, and that on large sites allocated in the Site Allocations DPD and large windfall sites, the need for a proportion of sheltered or extra care housing is considered as part of the overall housing mix.</p> <p>The Elstree Way Corridor Area Action Plan (EWCAAP) (2015) Policy EWC3 requires a mix of homes to be provided in the AAP area. Housing developments of over 25 units must contain variation in type and size, including a proportion of three bed units. Without the emerging Local Plan, it is uncertain whether the appropriate housing mix would be delivered during the plan period of the current Local Plan (until 2027), as needs are likely to have changed since that plan was prepared. Following this, without a planned local approach to development, the appropriate housing mix may not be delivered.</p>
<p><b>Service Accessibility</b> – Promote vibrant inclusive communities with</p>	<p>Policy CS18 of the Core Strategy states that the Council will require new development to contribute to the Community Strategy aim of achieving fair access to key community facilities, and where necessary provide key community facilities.</p>

# DRAFT

Key Sustainability Issues	Likely Evolution without Implementation of the Local Plan
<p>good accessibility to services, education and employment.</p>	<p>Policy CS19 of the Core Strategy states that proposals for the provision or dual use of key community facilities will be supported, and that the loss of facilities will not be permitted.</p> <p>Policy SADM32 supports provision and enhancement of community facilities and identifies specific proposals for provision of community facilities. Policy SADM33 also supports provision and enhancement of facilities in which faith communities can meet and worship. Policy SADM42 supports specific proposals to improve facilities, functions and environment of town centres. Policy SADM45 aims to protect class A1 shops in local and neighbourhood centres, neighbourhood parades and for individual shops. Policies SADM46, SADM47 and SADM48 give further details on appropriate development in such areas.</p> <p>The EWCAAP Policy EWC4 promotes retention and enhancement of community facilities and provision of new facilities where a need has been identified.</p> <p>The latest local housing need projection for Hertsmere (based on the Government's standard method) is for a minimum of 717 dwellings per annum between 2020 and 2030. The residents of these properties will require additional accessible services.</p> <p>Without the emerging Local Plan, it is uncertain whether services would be retained and provided during the plan period of current Local Plan (until 2027), as needs are likely to have changed since that plan was prepared. In addition, it is recognised that a time lag between the development of new homes and the provision of additional infrastructure may occur in some locations. Following this, without a planned local approach to development, the required accessible services may not be delivered.</p>
<p><b>Health</b> – There is a need to reduce health inequalities within Hertsmere.</p>	<p>Policy SP1 of the Core Strategy states that all development should ensure healthy living environments for residents and users of development. Policy CS19 also states that healthcare facilities should be retained.</p> <p>SADMPP Policy SADM20 works to maintain health and amenity by ensuring development of sensitive uses in proximity to AQMAs are only permitted where it will not result in an undue impact on health. In addition, this policy states that new residential development should not be exposed to existing significant sources of noise pollution and light installations should not harm the amenity of residents. Policy SADM30 is also expected to contribute to retaining residential amenity.</p> <p>Life expectancy in Hertsmere is 9.2 years lower for men and 6.2 years lower for women in the most deprived areas of Hertsmere compared to the least deprived areas. Additionally, the rates of smoking, excess weight in adults, physically active adults, dementia diagnoses, diabetes diagnoses, excess winter deaths and deaths and injuries on roads are above the England average. Local priorities include reducing obesity, increasing physical activity, reducing smoking, and helping the growing older population maintain their health.</p> <p>Without the emerging Local Plan, these issues are likely to continue, although the SADMPP is expected to safeguard residential amenity throughout the current Local Plan period (until 2027).</p>
<p><b>Biodiversity</b> – Although there are no EU level designations in Hertsmere, a number of habitats have been</p>	<p>Policy CS12 of the Core Strategy states that developments should conserve and enhance the natural environment of the Borough, including biodiversity, habitats, protected trees, landscape character, and sites of ecological and geological value. It also requires developments to identify opportunities for habitat creation and enhancement.</p>



# DRAFT

Key Sustainability Issues	Likely Evolution without Implementation of the Local Plan
<p>identified as internationally important under the EU Habitats Directive.</p>	<p>Policy SADM10 of the SADMPP requires developers to avoid significant harm to sites of importance for biodiversity and geodiversity in the first instance or implement mitigation or compensatory measures where this is not possible and the benefits of development clearly outweigh any harm. SADMPP Policy SADM12 requires healthy, high quality trees and hedgerows to be retained. SADM 13 and SADM16 may also retain the quality of watercourses, by requiring development to have regard to its impact on these. SADM28 requires the Watling Chase Community Forest Plan and supplementary planning guidance to be material considerations for the determination of planning applications in the Forest area.</p> <p>A number of habitats have been identified as internationally important under the EU Habitats Directive. These include characteristic oak-hornbeam woodlands, the natural stand type found within Hertsmere. Additionally, Redwell Wood SSSI is located in Hertsmere and over 40% of this site is in an unfavourable – recovering condition. Castle Lime Works Quarry is a geological SSSI and is in unfavourable declining condition.</p> <p>Without the emerging Local Plan, habitats are likely to be protected during the plan period of the current Local Plan (until 2027). Following this, without a planned local approach to development, habitat and biodiversity may be at risk from poorly planned development and their conditions could degrade. This may exacerbate degradation due to changes to or a decline in habitat management. Whilst habitat management is expected to be largely outside the scope of the Local Plan, site and habitat management can play an important role in improving habitat condition.</p>
<p><b>Historic environment</b> – Hertsmere has a large number of listed buildings, designated conservation areas, four Registered Parks and Gardens and four Scheduled Monuments.</p>	<p>Policy CS14 of the Core Strategy states that development proposals must conserve or enhance the historic environment of the Borough. Additionally, it states that developments should be sensitively designed to a high quality and not cause harm to identified, protected sites, buildings or locations of heritage or archaeological value including Conservation Areas, Listed Buildings, Historic Parks and Gardens, Scheduled Ancient Monuments or their setting, and identified and as yet unidentified Archaeological Remains.</p> <p>SADMPP Policy SADM29 states that the Council will not permit development proposals that fail to protect or enhance the setting, significance, character and appearance of a heritage asset, including nationally and locally listed buildings and historic parks and gardens. It states that historic features, open spaces and views should be retained within Conservation Areas. It also states that developers will be required to undertake an archaeological field assessment prior to the Council granting planning permission. Development on or affecting the setting of the site of the Battle of Barnet (1471) is not permitted.</p> <p>Hertsmere contains numerous historic features which could be adversely affected by poorly planned development.</p> <p>Without the emerging Local Plan, the historic environment is likely to be protected during the plan period of the current Local Plan (until 2027). Following this, without a planned local approach to development, heritage assets and their settings may be at risk from poorly planned development. In addition, transport issues are likely to continue and transport-related emissions are likely to increase in the absence of the plan. This could affect the historic environment as traffic may detract from the settings of historic and heritage assets and increases in pollution may damage their fabric. Changes in noise and light pollution, landscape and townscape and climate change are also likely to affect the historic environment.</p>
<p><b>Transport</b> – Issues associated with road links being better than access to public transport is reflected in high levels of car ownership and traffic congestion. However, traffic</p>	<p>Policy CS24 of the Core Strategy requires new development to comply with the Hertfordshire Local Transport Plan, provide a Travel plan, and contribute to the provision or funding of new infrastructure or improved public transport services and non-motorised routes.</p> <p>Policy CS25 of the Core Strategy make requirements for the quantity of off-street parking for all modes of transport to be provided at new developments.</p>

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Key Sustainability Issues	Likely Evolution without Implementation of the Local Plan
<p>congestion will continue without intervention. Additionally, there is a severe deficit in rail services both for passengers and freight.</p>	<p>Policy CS26 of the Core Strategy states that the Council will support a wide range of measures to provide safer and more reliable alternatives to the car, including improved public transport facilities and routes, and the enhancement, additional and safeguarding of non-motorised links.</p> <p>SADMPP Policy SADM38 aims to direct new development to the appropriate category of road in the road hierarchy, which may contribute to reducing congestion. Policy SADM39 directs major trip generating development to town centres and Transport Development Areas, where the access to sustainable transport is likely to be better.</p> <p>Policy EWC1 of the EWCAAP requires development proposals to provide access across the Elstree Way Corridor by sustainable modes of transport. EWC5 supports promotion of safer and more attractive routes for pedestrians, cyclists and public transport users.</p> <p>CO<sub>2</sub> emissions for transportation alone in Hertsmere (388.3kt CO<sub>2</sub> in 2017) are significantly higher than the average for Hertfordshire (287 in 2017). Moreover, transport emissions in Hertsmere have been increasing from 2013-2017. Additionally Hertsmere contains eight AQMAs.</p> <p>Without the emerging Local Plan, transport issues are likely to continue, notably following the plan period of the current Local Plan (until 2027), and transport related emissions likely to continue to rise.</p>
<p><b>Climate Change Adaptation and Mitigation</b> – Climate change is a key global issue and efforts to minimise climate change as far as possible, as well as to adapt to the effects of climate change, should be undertaken at all scales, in all sectors. There is therefore a need to address issues related to climate change and low carbon development and to reduce emissions including those from transport methods.</p>	<p>Policy CS17 of the Core Strategy states that residential development must achieve minimum levels of the Code for Sustainable Homes and Part L of the Buildings Regulations. It also requires all new non-domestic development to achieve, as a minimum, CO<sub>2</sub> emissions reductions in-line with the Building Regulations Part L. Additionally, it requires large scale developments to incorporate on-site renewable energy generation.</p> <p>Policy CS16 of the Core Strategy states developments should not create an unacceptable level of risk to the wider environment. This also requires developments to incorporate sustainability principles, minimise their impact on the environment and ensure prudent use of natural resources. This includes minimising pollution, using locally sourced materials where possible in line with the requirements of BREEAM on sustainable design, as well as achieving reduced levels of energy consumption and the use of energy from renewable resources.</p> <p>SADMPP Policies SADM13 and SADM15 are likely to contribute to climate change adaptation by minimising future increases in flood risk. Policies SADM34, SADM35, SADM36 and SADM37 may also contribute to climate change adaptation and mitigation as these promote retention, enhancement and creation of green space.</p> <p>CO<sub>2</sub> emissions in Hertsmere (703.5kt CO<sub>2</sub> in 2017) are higher than the average for Hertfordshire (599.42kt CO<sub>2</sub> in 2017).</p> <p>Without the emerging Local Plan, the NPPF and Buildings Regulations will enforce energy efficiency and carbon reduction requirements on developments. Also, the environmental requirements of the current Local Plan will remain in force over its plan period (until 2027). Without a planned approach to development through the emerging Local Plan however, there is less opportunity to adopt a co-ordinated, spatial approach that would help to manage health and environmental risks and require higher efficiency and environmental standards. Therefore, issues regarding greenhouse gas emissions and the effects of climate change may continue to a greater degree if the new Local Plan were not in place.</p>
<p><b>Resource Efficiency</b> – There is a need to reduce energy demand, improve energy efficiency and the</p>	<p>Policy CS17 of the Core Strategy states that residential development must achieve minimum levels of the Code for Sustainable Homes (although the Code was withdrawn in 2014) and Part L of the Buildings Regulations. It also requires all new non-domestic development to achieve as a minimum</p>

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Key Sustainability Issues	Likely Evolution without Implementation of the Local Plan
<p>use of low carbon and renewable resources.</p>	<p>CO<sub>2</sub> emissions reductions in-line with the Building Regulations Part L. Additionally, it requires large scale developments to incorporate on-site renewable energy generation.</p> <p>Policy CS16 of the Core Strategy states developments should not create an unacceptable level of risk to the wider environment. This also requires developments to incorporate sustainability principles, minimise their impact on the environment and ensure prudent use of natural resources. This includes minimising pollution, using locally sourced materials where possible in line with the requirements of BREEAM on sustainable design, as well as achieving reduced levels of energy consumption and the use of energy from renewable resources.</p> <p>SADMPP Policy SADM17 requires wastewater efficiency measures to be incorporated into the development. This policy also requires non-residential development to enable achievement of the BREEAM 'Excellent' standard or the best practice level of the Association for Environment Conscious Building Water Standards or equivalent.</p> <p>CO<sub>2</sub> emissions in Hertsmere (703.5kt CO<sub>2</sub> in 2017) are higher than the average for Hertfordshire (599.24kt CO<sub>2</sub> in 2017). Additionally Hertsmere contains 8 AQMAs.</p> <p>Without the emerging Local Plan, the NPPF and Buildings Regulations will enforce energy efficiency and carbon reduction requirements on developments. Also, the environmental requirements of the current Local Plan will remain in force over its plan period (until 2027). Without a planned approach to development through the emerging Local Plan however, there is less opportunity to adopt a co-ordinated, spatial approach that would help to manage health and environmental risks and require higher efficiency and environmental standards. Therefore, issues regarding resource efficiency may continue.</p>
<p><b>Water Supply</b> – Affinity Water who provide the mains water supply in Hertsmere do not have sufficient water to meet their customers' future needs for water.</p>	<p>Policy CS16 of the Core Strategy states developments should not create an unacceptable level of risk to the wider environment. This also requires developments to incorporate sustainability principles, minimise their impact on the environment and ensure prudent use of natural resources. This includes improving water efficiency through measures such as water saving devices in line with the Code for Sustainable Homes and BREEAM as a minimum requirement and incorporating the use of Sustainable Urban Drainage Systems.</p> <p>SADMPP Policy SADM13 supports effective use of the water supply and does not permit development that may affect the water table.</p> <p>Affinity Water provides the mains water supply in Hertsmere Borough. However, their Water Resources Management Plan (WRMP) found that their Central and Southeast regions do not have sufficient water for the whole of the 25-year planning period to meet their customers' need for water. Affinity Water have produced a WRMP to set out how water demand will be managed.</p> <p>Without the emerging Local Plan, water efficiency measures will be implemented over the plan period of the current Local Plan (until 2027). Following this, without a Local Plan there may be water supply shortages due to inappropriate development. The absence of a Local Plan after 2027 will reduce the ability of Affinity Water to plan for necessary strategic infrastructure and increases in water demand, due to a lack of information and certainty regarding the locations and quantities of planned future development.</p>

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Key Sustainability Issues	Likely Evolution without Implementation of the Local Plan
<p><b>Open Space</b> – There is a shortage of open space across the whole of Hertsmere.</p>	<p>Policy CS15 of the Core Strategy states the council will safeguard, enhance and facilitate access to parks and open spaces, as well as to rural visitor attractions and the wider local countryside.</p> <p>SADMPP Policy SADM34 encourages development to improve the quality, quantity and/or accessibility of open space, sports and leisure facilities and to not exacerbate existing deficits of open space and leisure facilities. Policies SADM35 and SADM36 require developments to retain Local Green Space and Minor Amenity Land in most circumstances. Policy SADM37 requires larger developments to provide new open space on site.</p> <p>Hertsmere has a diverse distribution of different types of open space. However, compared to the proposed standards there are deficiencies within Hertsmere Borough.</p> <p>Without the emerging Local Plan, open spaces are likely to be protected and enhanced during the plan period of the current Local Plan (until 2027). Following this, without a planned local approach to development, open spaces may be at risk from poorly planned and located development, with potential pressure to build on some existing open spaces. Moreover, due to the increased housing need, demand for open space by residents will likely increase and may result in open space deficiencies.</p>
<p><b>Air quality</b> – Hertsmere Council has measured concentrations of NO<sub>2</sub> above the annual mean objective within and outside of existing AQMAs.</p>	<p>Policy CS16 of the Core Strategy states developments should not create an unacceptable level of risk to the wider environment. This also requires developments to incorporate sustainability principles, minimise their impact on the environment and ensure prudent use of natural resources. This includes minimising air pollution.</p> <p>Policy SADM20 of the SADMPP does not permit development that would significantly exacerbate poor air quality in AQMAs and requires that sensitive development located in or adjacent to AQMAs will not result in an undue impact on health.</p> <p>Hertsmere contains eight AQMAs designated due to nitrogen dioxide pollutants. Four of these were designated in 2003, two in 2005, and two in 2016.</p> <p>Whilst the SADMPP is expected to ensure that poor air quality is not exacerbated in the Borough, air quality may deteriorate after the current Local Plan period (until 2027). Without the Local Plan, and its planned approach to development, air pollution issues may continue. The new Local Plan could act to improve air quality, rather than just ensuring it does not deteriorate further.</p>
<p><b>Flooding</b> – Surface water flooding is highlighted as a major cause of frequent flooding in Hertsmere and often occurs in combination with groundwater flooding. Drainage infrastructure flooding has also been recorded in all urban areas across the Borough.</p>	<p>Surface water flooding is highlighted as a major cause of frequent flooding in the Borough and often occurs in combination with groundwater flooding.</p> <p>Waste water has a detrimental impact on water quality, with over 2,000 residential properties and six large sewage treatment works discharging treated water into local rivers in the catchment. In addition, challenges caused when intermittent sewage is discharged (under license) during storm events, can also impact on groundwater.</p> <p>Policy CS16 of the Core Strategy states developments should not create an unacceptable level of risk to the wider environment. This also requires developments to incorporate sustainability principles, minimise their impact on the environment and ensure prudent use of natural resources. This includes incorporating the use of Sustainable Urban Drainage Systems and avoiding development in floodplains.</p> <p>SADMPP Policy SADM13 directs development towards Flood Zone 1. This policy does not permit new development in Flood Zone 3b and will only support redevelopment in this zone if for a compatible use. Policy SADM14 requires development to be located within areas of lower flood risk. It also</p>

# DRAFT

Key Sustainability Issues	Likely Evolution without Implementation of the Local Plan
	<p>requires that development does not increase risk of flooding elsewhere and requires development at risk of flooding to be flood resilient, resistant and safe. In addition, Policy SADM15 promotes use of SuDS for flood attenuation and reduction in flood risk.</p> <p>Without the Local Plan, the Core Strategy may successfully limit the impacts of flooding over its plan period. Following this, without a planned approach to development via the local plan, issues regarding flooding may continue due to inappropriate development.</p> <p>Pollution reduction measures will be implemented over the plan period of the current Local Plan (until 2027). However, without a planned approach to development via the emerging Local Plan, particularly following the plan period of the Core Strategy, there may be continued and increasing issues with regard to water pollution due to inappropriate development.</p>
<p><b>Deprivation</b> – Hertsmere’s average deprivation rank is below the county average, with three wards containing Lower Super Output Area (LSOA) that fall within the top 10% most deprived nationally.</p>	<p>There are no policies directly regarding deprivation in the current Local Plan (until 2027).</p> <p>Life expectancy in Hertsmere is 9.2 years lower for men and 6.2 years lower for women in the most deprived areas of Hertsmere than in the least deprived areas. Additionally, 11.9% of children are in low income families. One LSOA within Hertsmere falls within the top 10% most deprived LSOAs nationally. Furthermore, there are three wards in Hertsmere which contain LSOAs within the 10% most deprived in the country in terms of barriers to housing and services.</p> <p>Without the emerging Local Plan, these issues are likely to continue. It is recognised that the Local Plan is only part of the solution to tackling deprivation and that there are a range of factors that may need to be addressed outside the scope of the Local Plan.</p>

## Chapter 4

# Sustainability Appraisal Findings for Reasonable Alternatives

**4.1** This chapter presents the findings of the SA of the reasonable alternatives considered for inclusion in the emerging Hertsmere Local Plan. This includes alternative options for the housing target, employment needs and site allocation options.

**4.2 Appendix H** provides a record of the alternatives considered at Issues and Options stage, although it is noted that some of these are now out of date. The basis of calculating housing and employment figures has changed substantially since the Issues and Options stage. As such, updated figures and reasonable alternatives are presented below.

### Housing Provision Options

**4.3** A standard method for calculating housing need was introduced in 2017 as part of the Housing White Paper . The NPPF expects plan-making authorities to use this method and the most up to date method is set out in the PPG. The housing target for Hertsmere is 12,160 additional dwellings between 2022 and 2038 (760 dwellings per year). This reflects the objectively assessed need (OAN) plus a 5% buffer to ensure choice. Given the need to use the standard method, the Council do not consider there to be any reasonable alternatives to this figure. However, it is noted that the standard methodology has been subject to change since its introduction and may be amended again in the future.

**4.4** An assessment of this figure is set out below and summarised in **Table 4.1**:

### SA Findings

**4.5** Providing for 760 dwellings per annum (dpa) is expected to have a significant positive effect against SA Objective 3 (Housing Provision) because it will meet the objectively assessed need for housing, and is expected to deliver a variety of homes.

**4.6** Mixed significant positive uncertain and significant negative uncertain effects are expected in relation to SA Objective 1 (Education), 2 (Services) and 5 (Health) because this level of housing could place pressure on existing services and facilities (including education, healthcare and recreation facilities) but could also provide funding and the critical mass for provision of new services and facilities.



**4.7** A mixed minor positive and minor negative effect is expected in relation to SA Objective 6 (Soil and Minerals) because some development may come forward on previously developed land, but due to the amount of development required and constraints of the Borough, some development would also come forward on greenfield land.

**4.8** Significant negative uncertain effects were identified in relation to SA Objectives 7 (Historic Environment), 8 (Landscape), 10 (Biodiversity and Geodiversity), 11 (Water Quality and Quantity) and 12 (Flooding). Due to the constrained nature of the Borough and the scale of development required, development is likely to be in proximity to historic, biodiversity and geodiversity receptors, result in urbanisation of the landscape, place greater demand on water supply and sewage infrastructure, and increase the risk of flooding by introducing more impermeable surfaces to the area. Many effects will depend on the final location, layout and design of development.

**4.9** Mixed significant positive uncertain and significant negative effects are expected for SA objectives 9 (Greenhouse gas emissions) and 13 (Air quality) because development will result in an increase of residents within the

Borough and an increase in greenhouse gas emissions, particularly due to an increase in private cars on the Borough's roads. In addition, there will be release of greenhouse gas emissions during housing construction and to meet energy demands of residents. However, housing delivery could also result in funding for additional sustainable transport infrastructure and reduce private car usage across the Borough. Although housing may be planned to be located suitably and designed to incorporate sustainable transport and minimise greenhouse gas emissions, this is not known at this stage.

**4.10** Significant negative effects are identified for SA objective 14 (Energy efficiency) because housing construction requires high levels of energy use, and new residents are likely to use substantial amounts of energy at home. The effects of additional housing on energy efficiency will depend on the design and layout of housing, therefore effects are uncertain.

**4.11** Minor positive effects are expected for SA Objective 15 (Economy) because the residents of new housing will provide an increased workforce, supporting the local economy and helping to attract business to the Borough.

**Table 4.1: Summary of SA scores for the housing provision target**

SA Objective	760 dpa
1. To improve access to education, training, opportunities for lifelong learning and employability.	++?/--?
2. To ensure ready access to essential services and facilities for all residents.	++?/--?
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	++
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	++?/--?
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	+/-
7. To protect and, where appropriate, enhance heritage assets and their settings.	--
8. To maintain and enhance the quality of countryside and landscape.	--?
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	++?/--
10. To protect and enhance biodiversity and geodiversity.	--
11. To improve water quality and manage water resources sustainably.	--?
12. To minimise the risk of flooding taking account of climate change.	--?
13. To improve local air quality.	++?/--
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	--?

SA Objective	760 dpa
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	+

## Employment Provision Options

**4.12** Since the 2016 Employment Study, the requirement for office space has decreased, but the requirement for industrial employment space has increased, due to the consistently strong levels of demand for industrial space in South West Hertfordshire, which could have been even higher if the market was not undersupplied. The continued growth of online shopping is also likely to mean this strong demand is sustained. In addition, the introduction of the standard method for calculating housing need has resulted in a higher housing target. While the standard method is not dependent on expected job growth, the increased housing figure, and therefore increased population, will result in an increased local workforce. In addition, Hertsmere is expected to experience more growth from London, due to space constraints in London boroughs.

**4.13** The three scenarios assessed in the SA of the Issues and Options Document were drawn from the 2016 Economic Study. This study was updated in 2019 and the three scenarios have been updated as follows:

- Employment-led scenario: 17.9ha employment land (approximately 8,400 jobs).
- Labour supply scenario: 85.4ha employment land (approximately 20,700 jobs).
- Higher growth scenario: 65.9ha employment land (approximately 17,800 jobs).

**4.14** The 2019 Employment Study also included the 'trend-based scenario':

- Trend-based scenario: 155.6ha (approximately 28,000 jobs).

**4.15** The figures above are for South West Hertfordshire (the Functional Economic Market Area, or FEMA) as a whole. Note that they differ slightly from those set out in the Economic Study, as the Economic Study covers the period 2018-2036, whereas the figures above have been updated to cover 2018-2038. A proportionate amount of this growth would be directed to Hertsmere in each scenario.

**4.16** Hertsmere Borough Council identified an additional alternative for Hertsmere, which is not part of the 2019 Employment Study:

- Investment-based scenario: This scenario includes Hertsmere's proportion of the growth set out in the trend-

based scenario, with the addition of over 63ha employment land to meet national and regional demand for the screen sector, which is already a strong industry in Hertsmere.

**4.17** An assessment of these figures is set out below and summarised in **Table 4.2:**

### SA Findings

**4.18** Employment growth has potential to increase access to training and education opportunities, through links with educational institutions, work placements and apprenticeship schemes. Greater levels of employment growth have more potential to open up such opportunities. As such, negligible uncertain effects are recorded for the employment-led scenario and minor positive uncertain effects are recorded for all other scenarios.

**4.19** Mixed positive and negative effects were identified with regards to SA Objective 6 (Soil and Minerals), as all scenarios are likely to require development on both greenfield and brownfield land. For the highest growth scenarios, the trend-based scenario and investment-based scenario, a there is likely to be substantial loss of greenfield land and a higher possibility that best and most versatile agricultural land may be lost to development, therefore the negative effects recorded are significant. Similarly, mixed effects were recorded with regards to SA Objective 9 (Greenhouse Gas Emissions) and SA Objective 13 (Air Quality), as although additional job growth will lead to increased energy demand and an increased number of cars on the road, employment development may provide funding for public transport improvements and may increase the accessibility of employment sites, thereby minimising car use. Generally, effects are more likely to be significant with regards to the investment-based, trend-based, labour supply and higher growth scenarios, as they would provide for more jobs, therefore they are likely to require greater land take and result in more vehicle movements, through people driving to work or the coming and going of deliveries or industrial traffic. However, greater employment growth may also increase accessibility of employment, meaning that the population do not have to travel so far to work and development may also provide more funding opportunities for sustainable transport.

**4.20** Negative effects were identified in relation to most other environmental objectives, including SA Objective 7 (Historic Environment), SA Objective 8 (Landscape), SA Objective 10

(Biodiversity and Geodiversity) and SA Objective 12 (Flooding). Due to the constrained nature of the Borough and the scale of development required, development is likely to be in proximity to receptors that will be affected by this. Larger amounts of employment development are more likely to lead to significant negative effects on these objectives, due to the greater land-take required. Similarly, negative effects were identified in relation to SA Objective 11 (Water Quality and Quantity) as employment development could place increased pressure on sewage infrastructure and potable water supply, with larger amounts of employment development being more likely to lead to significant negative effects due to this increased pressure. As such, effects for these objectives are expected to be minor for the employment-led scenario and significant for all other scenarios.

**4.21** Construction of employment sites will require high levels of energy use, and businesses are likely to use substantial amounts of energy in their normal operations. The investment-based, trend-based, labour supply, and higher growth scenarios are likely to lead to higher energy consumption, therefore they are assessed as having significant negative

effects on this objective. As the employment-led scenario will provide the lowest number of jobs, minor negative effects have been recorded. However, these effects are uncertain as energy efficiency will depend on the exact use, layout and design of development.

**4.22** The 2019 Employment Study suggests that the employment-led scenario gives an unrealistic assessment of future growth prospects in South West Hertfordshire and could impose substantial constraints on the growth potential of the area. As such, minor negative effects are identified for this option with regards to SA objective 15 (Employment).

**4.23** All other options would contribute to ensuring sufficient employment space for a strong, local economy, resulting in significant positive effects for SA objective 15 (Employment). However, there is some uncertainty associated with the investment-based scenario as it depends on anticipated, but uncertain, investment from the screen sector.

**4.24** The quantum of employment development is not expected to affect SA objectives 2 to 5, therefore negligible effects have been recorded for these objectives.

**Table 4.2: Summary of SA scores for the employment provision options**

SA Objective	Employment-led 8,400 jobs	Labour supply 20,700 jobs	Higher growth 17,800 jobs	Trend-based 28,000 jobs	Investment-based
1. To improve access to education, training, opportunities for lifelong learning and employability.	0?	+	+	+	+
2. To ensure ready access to essential services and facilities for all residents.	0	0	0	0	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0	0	0	0	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0	0	0	0	0
5. To improve population's health and reduce inequalities.	0	0	0	0	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	+/-	+/-	+/-	+/--	+/--
7. To protect and, where appropriate, enhance heritage assets and their settings.	-	--	--	--	--

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SA Objective	Employment -led 8,400 jobs	Labour supply 20,700 jobs	Higher growth 17,800 jobs	Trend-based 28,000 jobs	Investment- based
8. To maintain and enhance the quality of countryside and landscape.	-	--	--	--	--
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	+?/-?	++?/--?	++?/--?	++?/--?	++?/--?
10. To protect and enhance biodiversity and geodiversity.	-	--	--	--	--
11. To improve water quality and manage water resources sustainably.	-	--	--	--	--
12. To minimise the risk of flooding taking account of climate change.	-	--	--	--	--
13. To improve local air quality.	+?/-?	++?/--?	++?/--?	++?/--?	++?/--?
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	-	--	--	--	--
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	-	++	++	++	++?

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Table 4.3: SA scores for potential sites for housing

	SA 1: Education	SA 2: Services	SA 3: Housing Provision	SA 4: Community Cohesion	SA 5: Health	SA 6: Soil and Minerals	SA 7: Historic Environment	SA 8: Landscape	SA 9: Greenhouse Gas Emissions	SA 10: Biodiversity and Geodiversity	SA 11: Water Quality and Quantity	SA 12: Flooding	SA 13: Air Quality	SA 14: Energy Efficiency	SA 15: Economy
Non-strategic housing sites															
HEL152	--	-	+	0	++/-	-	-?	-	-	--	0	0	0	0	+/-
HEL152	--	-	+	0	++/-	-	-?	-	-	--?	0	0	0	0	+/-
HEL162	--	0	+	0	++/--	-	-?	-	-	-	0	0	--	0	+/-
HEL171	--	0	+	0	++/--	-	-?	--	-	--	0	0	--	0	++
HEL173	+	0	+	+	++?/--?	-	--?	-	+	--	0	0	--	0	+/-
HEL175	+	--	+	0	++/--	+	--?	--/+	--	0	0	0	0	0	--/+
HEL177	--	0	+	0	++/--	-	-?	-	-	-	0	0	--	0	+/-
HEL179	--	-	+	+	++/--	-	--?	--	-	-?	-?	0	--	0	+
HEL180	+	0	+	+	++/-	-	-?	--	-	-	-?	0	--	0	--/+
HEL196	+	0	+	+	++/-	-	--?	--	-	-	0	0	0	0	--/+
HEL197a	--	-	+	+	++/--	-	-?	-	+	--?	0	0	0	0	+/-
HEL197b	--	-	+	+	++/--	-	-?	-	+	--	0	0	0	0	+/-

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	SA 1: Education	SA 2: Services	SA 3: Housing Provision	SA 4: Community Cohesion	SA 5: Health	SA 6: Soil and Minerals	SA 7: Historic Environment	SA 8: Landscape	SA 9: Greenhouse Gas Emissions	SA 10: Biodiversity and Geodiversity	SA 11: Water Quality and Quantity	SA 12: Flooding	SA 13: Air Quality	SA 14: Energy Efficiency	SA 15: Economy
HEL199	--	-	+	+	++/-	-	--?	--	-	-?	-?	0	--	0	+
HEL205	+?	0	+	+	++/-	-	--?	-	-	-	-?	--	0	0	+/-
HEL211	-?	0	+	+	++/-	-	-?	-	-	-	-?	0	0	0	++
HEL212	+?	+	+	+	++/--	-	--?	--	-	-?	0	0	--	0	++
HEL214	+?	+	+	+	++/--	-	-?	--	+	-	0	0	--	0	+
HEL215	-?	0	+	+	++/-	-	-?	-	-	-	0	0	0	0	--/+
HEL216	+++?	++	+	++	++/-	+?	-?	0	+	0	0	-	0	0	++
HEL217	+?	++	+	0	++/--	+?	-?	0	-	0	0	0	--	0	--/+
HEL218	+?	0	+	0	+++?/-?	-	-?	-	-	-	0	0	0	0	--/+
HEL219	--	-	+	+	+++?/-?	-	--?	--	-	-	-?	0	0	0	+
HEL220	--	--/+	+	0	+++?/-?	+?	0?	-	+	--	0	0	--	0	--/+
HEL222	--	+	+	0	++/--	-	--?	0	+	-?	0	0	--	0	--/+
HEL228a	+?	+	+	+	++/-	-	-?	-	-	-	-?	--	0	0	--/+



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	SA 1: Education	SA 2: Services	SA 3: Housing Provision	SA 4: Community Cohesion	SA 5: Health	SA 6: Soil and Minerals	SA 7: Historic Environment	SA 8: Landscape	SA 9: Greenhouse Gas Emissions	SA 10: Biodiversity and Geodiversity	SA 11: Water Quality and Quantity	SA 12: Flooding	SA 13: Air Quality	SA 14: Energy Efficiency	SA 15: Economy
HEL228b	+	0	+	+	++/-	-	-?	-	-	--	-?	-	0	0	--/+
HEL231	+	++	+	0	++/-	-	-?	--	+	-	-?	0	--	0	--/+
HEL235	-?	-	+	0	++/-	+	0?	0	-	0	-?	0	0	0	+/-
HEL239	+	0	+	0	++/-	-	--?	-	-	--?	0	0	0	0	+/-
HEL252	--	-	+	+	++/-	--	--?	--	-	-	-?	0	0	0	+
HEL254	+	0	+	+	++/-	-	--?	0	-	-	0	0	--	0	--/+
HEL255	+	0	+	+	++/-	-	--?	0	-	-?	0	0	--	0	--/+
HEL274	+	0	+	0	++/-	-	--?	--	+	-	0	0	--	0	++
HEL318	--	0	+	+	++	-	-?	-	+	-	0	0	0	0	+
HEL320	+	+	+	+	+++/-?	-	--?	-	+	-?	-?	0	0	0	+/-
HEL321	+	0	+	+	+++/-?	-	--?	-	+	-	-?	0	0	0	+/-
HEL336	-?	-	+	+	+++/-?	-	-?	-	-	--?	0	0	0	0	--/+
HEL337b	-?	0	+	0	++/-	+	-?	0	-	-	0	0	0	0	+/-

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	SA 1: Education	SA 2: Services	SA 3: Housing Provision	SA 4: Community Cohesion	SA 5: Health	SA 6: Soil and Minerals	SA 7: Historic Environment	SA 8: Landscape	SA 9: Greenhouse Gas Emissions	SA 10: Biodiversity and Geodiversity	SA 11: Water Quality and Quantity	SA 12: Flooding	SA 13: Air Quality	SA 14: Energy Efficiency	SA 15: Economy
HEL337c	-?	0	+	0	++/-	-	-?	-	-	-	0	0	0	0	+/-
HEL343b	--	--	+	+	++/-?	-	-?	--	-	-?	0	0	0	0	+/-
HEL345	--	0	+	+	++/-	+?	--?	--/+	-	-?	-?	0	--	0	+/-
HEL357	+?	0	+	0	++?/--?	-	--?	--	--	-?	0	0	0	0	--
HEL358	+?	0	+	0	++/-	-	-?	-	+	--	0	0	--	0	--/+
HEL360	+?	-	+	+	++/-	-	--?	--	-	-	0	0	0	0	--/+
HEL367	--	--	+	0	++?/--?	--	--?	--	--	-	0	0	--	0	--/+
HEL369	-?	-	+	0	++/-	-	--?	-	-	-?	0	0	0	0	+
HEL370R	--	-	+	+	++/-	-	--?	--	-	-	0	0	--	0	--/+
HEL371	+?	++?/-?	+	0	++/--	-	-?	-	-	-	0	0	--	0	+/-
HEL375	+++	+	+	0	++/--	-	-?	-	+	--?	0	0	0	0	++
HEL386	--	--	+	0	++/--	-	-?	-	-	-	0	0	0	0	+
HEL388	+?	++	+	+	++/-	+?	-?	0	+	0	0	0	--	0	+
HEL390	+?	-	+	0	++/-	-	-?	--	-	-	0	0	0	0	--/+

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	SA 1: Education	SA 2: Services	SA 3: Housing Provision	SA 4: Community Cohesion	SA 5: Health	SA 6: Soil and Minerals	SA 7: Historic Environment	SA 8: Landscape	SA 9: Greenhouse Gas Emissions	SA 10: Biodiversity and Geodiversity	SA 11: Water Quality and Quantity	SA 12: Flooding	SA 13: Air Quality	SA 14: Energy Efficiency	SA 15: Economy
HEL403	+?	++	+	++	++/--	+?	--?	0	+	-?	0	--	--	0	--/+
HEL404	--	+	+	++	++/--	+?	-?	0	-	0	0	0	--	0	+/-
HEL502	--	0	+	0	++/--	-	-?	-	-	--	0	0	0	0	+/-
HEL505	--	0	+	0	++/--	-	-?	-	-	-	0	0	0	0	+/-
HEL506	--	+	+	0	++/-	-	-?	--	+	-?	0	0	--	0	+/-
HEL508	+?	0	+	0	++/-	-	-?	--	-	-	0	0	0	0	--/+
HEL509	--	-	+	+	++/-	--	--?	--	-	-	-?	0	0	0	+/-
HEL510	--	-	+	0	++/--	-	-?	0	-	-	0	0	0	0	+/-
HEL601	--	-	+	0	++/-	-	-?	-	-	-	0	0	0	0	--/+
HEL602	+?	+	+	0	++/--	-	--?	--	-	--?	0	0	--	0	+
'Growth through new garden suburbs' options															
HEL361/PB1	++	++	++	++	++?/--?	-	--?	--?/+?	+?/-?	--?/+?	-?	0	--/+	0?	++
HEL251/PB2	++	++?/--?	++	++	++?/--?	-	-?	+?/-?	+?/-?	--?/+?	-?	-	+/-	0?	++

# DRAFT

	SA 1: Education	SA 2: Services	SA 3: Housing Provision	SA 4: Community Cohesion	SA 5: Health	SA 6: Soil and Minerals	SA 7: Historic Environment	SA 8: Landscape	SA 9: Greenhouse Gas Emissions	SA 10: Biodiversity and Geodiversity	SA 11: Water Quality and Quantity	SA 12: Flooding	SA 13: Air Quality	SA 14: Energy Efficiency	SA 15: Economy
HEL362/PB3	++	++	++	++	++?/--?	-	0?	+?/-?	+?/-?	--?/+?	0	0	--/+	0?	++
HEL161/PB4	+?	+	+	++	++/--	-	0?	+?/-?	+?/-?	+?/-?	0	0	--/+	0?	+/-
HEL393/BE1	+?	+	+	+	++?/--?	-	-?	--?/+?	+?/-?	+?/-?	0	0	--/+	0?	+
HEL359/BE2	+?	+	+	+	++/-	-	-?	+?/-?	+?/-?	--?/+?	0	0	--/+	0?	+/-
HEL347/BE3	++	++	++	+	++?/-?	-	-?	+?/-?	+?/-?	+?/-?	0	0	--/+	0?	++
HEL376	++	++	++	++	++?/--?	-	-?	--?/+?	+?/-?	--?/+?	0	0	+/-	0?	++
HEL209a/BE6	+?	+	+	+	++?/--?	-	0?	+?/-?	+?/-?	--?/+?	0	0	+/-	0?	++
HEL201	-?	+	+	+?	++?/--?	-	-?	+?/-?	+?/-?	+?/-?	0	0	+/-	0?	+/-
HEL201 and HEL336 combined/B1	++	++	++?	+?	++?/--?	-	-?	+?/-?	+?/-?	+?/-?	0	0	+/-	0?	+?/-
HEL181/B2	++	++	++?	+	++?/--?	-	-?	+?/-?	+?/-?	--?/+?	-?	0	+/-	0?	++?
HEL176/B3	+?	+?	+?	+++	++?/--?	-	--?	--?/+?	+?/-?	+?/-?	0	0	+?/-?	0?	+?/-?

# DRAFT

	SA 1: Education	SA 2: Services	SA 3: Housing Provision	SA 4: Community Cohesion	SA 5: Health	SA 6: Soil and Minerals	SA 7: Historic Environment	SA 8: Landscape	SA 9: Greenhouse Gas Emissions	SA 10: Biodiversity and Geodiversity	SA 11: Water Quality and Quantity	SA 12: Flooding	SA 13: Air Quality	SA 14: Energy Efficiency	SA 15: Economy
HEL355/B4	++	++	++	+	++?/--?	-	-?	+?/-?	+?/-?	--?/+?	0	0	--/+	0?	++
HEL379/R1 (including HEL379c)	+?	--/+	+	+?	++/-	-	-?	--?/+?	+?/-?	--?/+?	-?	0	--/+	0?	+
HEL379c	+?	+	+	0	++/-	-	-?	--?/+?	+?/-?	--?/+?	-?	0	--/+	0?	+
HEL346/R2	++	++	++	+++?	++?/--?	--	-?	--?/+?	--?/+?	+?/-?	0	0	--/+	0?	--/+
‘Supporting larger rural communities and growth of key villages’ options															
HEL350/S2	+?	--/+	+	+	++/-	-	-?	+?/-?	+?/-?	--?/+?	0	0	--/+	0?	--/+
HEL236 (incl. HEL236a&b)/S3	++	++	++	++	++?/-?	-	-?	--?/+?	+?/-?	+?/-?	-?	0	+/-	0?	+
HEL348/S4	+?	+/-	+	+	++/-	-	--?	--?/+?	+?/-?	--?/+?	0	0	--/+	0?	--/+
HEL349/S4	+?	+/-	+	+	++/-	-	--?	--?/+?	+?/-?	--?/+?	0	0	--/+	0?	--/+
HEL385a/SM1	+?	+	+	+	++?/--?	-	--?	+?/-?	+?/-?	+?/-?	-?	-	--/+	0?	+/-
HEL385b/SM2	+?	+	+	+	++?/--?	-	-?	+?/-?	+?/-?	--?/+?	-?	-	--/+	0?	+/-
HEL385c/SM3	+?	+	+	+	++?/-?	-	-?	+?/-?	+?/-?	--?/+?	-?	-	--/+	0?	+/-

# DRAFT

	SA 1: Education	SA 2: Services	SA 3: Housing Provision	SA 4: Community Cohesion	SA 5: Health	SA 6: Soil and Minerals	SA 7: Historic Environment	SA 8: Landscape	SA 9: Greenhouse Gas Emissions	SA 10: Biodiversity and Geodiversity	SA 11: Water Quality and Quantity	SA 12: Flooding	SA 13: Air Quality	SA 14: Energy Efficiency	SA 15: Economy
HEL516/SM4	+?	+	+	+	++?/--?	-	--?	+?/-?	+?/-?	--?/+?	0	0	--/+	0?	--/+
'New garden village' options															
NS1	++	++	++?	++	++?/--?	--	--?	--?/+?	+?/-?	--?/+?	-?	-	--/+	0?	++
'Meeting the needs of other villages' options															
HEL343 (H3)	--	--/+	+	+	++/-	-	-?	--?/+?	+?/-?	+?/-?	-?	0	+/-	0?	+/-
'Redeveloped urban brownfield site' options															
HEL392 (BE5)	++	++	++	++	++/--	+?	0?	+?/-?	++/-	+?/-?	0	0	--/+	0?	++?/-?



## Summary of SA Findings for Housing Sites

### SA Objective 1: Education

**4.25** Just under half of the housing sites were expected to have a minor positive effect against this objective because they are located within close proximity of a primary and/or secondary school in a settlement that has been identified as having primary and/or secondary school capacity. The effects are recorded as uncertain because it is unknown whether individual schools have capacity.

**4.26** Just under one third of sites were assessed as having a significant negative effect against this objective because they are located over 1km from a secondary school and over 500m from a primary school.

**4.27** A small percentage of sites were assessed as having a significant positive effect against this objective. This is due to the fact that some of them are strategic sites that will provide at least one education facility, whilst others are located within 1km of a secondary school and 500m of a primary school. The latter were assessed as having an uncertain effect because it is unknown whether the primary and secondary schools have capacity themselves or not.

**4.28** The remaining sites were assessed as having a minor negative but uncertain effect against this objective because they are located within 1km of a secondary school in a settlement with no secondary school capacity. It's unknown whether the secondary schools have capacity themselves or not.

### SA Objective 2: Services

**4.29** Just over 20% of housing site options are expected to result in minor positive effects because they fall within an area with 'medium/high' accessibility, whilst just under 20% are expected to result in minor negative effects because they fall within an area with 'low' accessibility.

**4.30** A very small number of sites are expected to have a mixed minor positive and minor negative effect against this objective because they fall within an area of 'low' accessibility but would be expected to deliver some new services and facilities, including healthcare, open space, leisure, recreation and community facilities. The provision of strategic pedestrian/cycle connectivity and improvements to inter-urban bus services and the local highway network are expected to make these services more easily accessible.

**4.31** Just over 15% of sites were assessed as having a significant positive effect against this objective because they fall within an area with 'very high' or 'high' accessibility and/or would provide over 500 new homes and therefore are

expected to make provision for a new local centre with shops, services and small business units.

**4.32** One site, HEL251/PB2: Potters Bar Golf Course, is expected to have a mixed significant positive and significant negative but uncertain effect against this objective because it would make provision for a local centre with shops, services and small business units. However, the site comprises Potters Bar Golf Course, which could be lost as a result of development.

**4.33** Site HEL371: Old Haberdashers Sports Ground is the only site expected to have a mixed significant positive and minor negative effect but uncertain against this objective. This is because this site falls within an area with 'high' accessibility but comprises a private sports club which could be lost or relocated as a result of development. Due to the fact it is a private facility, the effect would be minor.

**4.34** A very small number of sites were assessed as having a significant negative effect against this objective because they fall within an area with 'very low' accessibility and/or may result in the loss of a public facility.

**4.35** A very small number of sites were also assessed as having a mixed significant negative and minor positive effect against this objective because they fall within areas with 'very low' accessibility but will provide a range of services and facilities, including healthcare, open space, leisure, recreation and community facilities.

**4.36** The remaining sites are expected to have a negligible effect against this objective.

### SA Objective 3: Housing Provision

**4.37** The majority of housing sites in total were assessed as having a minor positive effect against this objective because although they will be providing new homes, they will be providing fewer than 500 new homes. One of the effects is recorded as uncertain because the Council has not yet decided how the site will be used (HEL176/B3: Bushey Golf and Country Club).

**4.38** The remaining sites, all of which are strategic sites, were assessed as having a significant positive effect against this objective. This is because they will provide over 500 new homes. The effect for site HEL382a&c/H2: Tyttenhanger Estate is recorded as uncertain because the site will deliver a significant amount of housing and may therefore result in a longer lead-in time, including in terms of infrastructure provision and so homes within the garden village may not be delivered until the latter phases of the Local Plan period as a result.

## SA Objective 4: Community Cohesion

**4.39** Around half of all housing sites are expected to have a minor positive effect against this objective because they are either located within one of the 20% most deprived areas with regard to the 'Barriers to housing and services' domain of the English Indices of Deprivation, or within close proximity of a town, local or neighbourhood centre. For three of these sites (HEL201/B1: Land at Little Bushey Lane; HEL379/R1: Kemprow Farm; and HEL274/E1: Edgewarebury Farm) the effect is uncertain because only part of the land within them is considered deprived in terms of access to housing and services. It is therefore unknown whether development will come forward within these deprived parts of the sites or not.

**4.40** Over 10% of sites are expected to have a significant positive effect against this objective because they are located within one of the 20% most deprived areas with regard to the 'Barriers to housing and services' domain of the English Indices of Deprivation and fall within 100m of a town, local or neighbourhood centre. Alternatively, the sites make provision for community spaces including open space, leisure, recreation and community facilities. Some of the strategic sites will deliver over 500 new homes and will therefore be expected to provide a new local centre. HEL176/B3: Bushey Golf and Country Club, is expected to have a significant positive but uncertain effect because the Council has not yet decided how the site will be used. HEL346/R2: Home Farm is also expected to have a significant positive but uncertain effect because it would be expected to provide a new local centre but only part of the site is within one of the 20% most deprived areas.

**4.41** The remaining sites are expected to have a negligible effect against this objective.

## SA Objective 5: Health

**4.42** Over half of the housing sites were assessed as having a mixed significant positive and significant negative effect against this objective because, although they are located within 800m of an open space, sport and recreation facility, they are also located within close proximity of Hertsmere's strategic road network. This could have an adverse effect on health in terms of noise and air pollution. The development of some sites could also result in the loss of a public facility, including open space. The effect against just under one third of these sites is recorded as uncertain due to the fact they may result in the loss of facilities.

**4.43** Just under half of sites were assessed as having a mixed significant positive and minor negative effect against this objective because although they tend to be located within close proximity of an open space, sport and recreation facility, they are not necessarily located within walking distance of an NHS GP surgery or hospital with capacity for new patients.

Uncertain effects were recorded against a small number of these sites because they may result in the loss of facilities.

**4.44** One site, HEL318: Former Sunny Bank Primary School, is expected to have a significant positive effect against this objective because it is located within 800m of open space, sport and recreation facilities and a hospital. It is not located within close proximity of an anaerobic digestion facility, a waste management facility or Hertsmere's strategic road network.

## SA Objective 6: Soil and Minerals

**4.45** The majority of sites are expected to have a minor negative effect against this objective because they are entirely or mainly located on greenfield land and comprise some of the best and most versatile agricultural land (Grades 1, 2 and 3). Many of them are also located within, or within 250m of a Minerals Consultation Area.

**4.46** Just over 10% of sites are expected to have a minor positive uncertain effect against this objective because they are entirely or mainly located on brownfield land which represents a more efficient use of land compared with development on greenfield land. This would also reduce the loss of agricultural land.

**4.47** A small number of sites are expected to have a significant negative effect against this objective because they contain Grade 2 agricultural land, which could be lost to development.

## SA Objective 7: Historic Environment

**4.48** Over one third of the sites are highly sensitive in relation to the Historic Environment. Significant negative uncertain effects have been predicted for these sites; typically, as a result of the potential for substantial harm to designated heritage assets located within or in close proximity to them.

**4.49** Minor negative effects that equate to either substantial or lesser harm to non-designated assets of low significance, or to less than substantial harm to assets of higher importance, are predicted for over half of the sites. These effects relate to either setting impacts to designated assets or physical and setting impacts to non-designated assets. Where there are physical impacts to heritage assets, the authority's historic environment advisers should be consulted as to the requirements of an appropriately staged programme of works.

**4.50** A small number of sites have been identified as having negligible effects on the historic environment either physically or in terms of setting. It should be noted that all effects on the historic environment are considered to be uncertain as they frequently depend on the exact location, size and design of development. Additionally, there is always the risk of

encountering previously unknown archaeological remains within a site.

## SA Objective 8: Landscape

**4.51** Just under one third of sites were assessed as having a minor negative effect against this objective because they fall within an area with low-moderate or moderate sensitivity to the relevant type of development, as set out in the Landscape Sensitivity Assessment.

**4.52** Just under one quarter of sites are expected to have a significant negative effect against this objective because they fall within an area with moderate-high or high sensitivity to the relevant type of development according to the Landscape Sensitivity Assessment. Development of some of these sites may also contribute to settlement coalescence.

**4.53** Just over 10% of sites are expected to have a mixed significant negative and minor positive effect against this objective because although enhancements to the green infrastructure network (including parks, green spaces and other natural features) are required at the strategic sites, which would enhance visual amenity, these sites fall within an area with moderate-high or high sensitivity to the relevant type of development, and may also result in settlement coalescence. Alternatively, some of these sites comprise brownfield or degraded land.

**4.54** Around a third of sites were assessed as having a mixed minor positive and minor or significant negative effect, because although enhancements to the green infrastructure network (including parks, green spaces and other natural features) are required at the strategic sites, which would enhance visual amenity, these sites fall within an area with low-moderate to high sensitivity.

**4.55** The remaining sites are expected to have a negligible effect against this objective.

## SA Objective 9: Greenhouse Gas Emissions

**4.56** Just under one half of sites were assessed as having a minor negative effect because they are within walking distance of only one sustainable transport mode.

**4.57** Just under one fifth of sites were assessed as having a minor positive effect against this objective because they are within walking distance of two sustainable modes of transport.

**4.58** Around 15% of sites were assessed as having a significant negative effect against this objective because they are not located within walking distance of any sustainable transport links.

**4.59** One site, HEL394/BE5: Elstree Way Corridor, was assessed as having a mixed significant positive and minor negative effect because, although it is located within close

proximity to two sustainable transport links and also expected to bring improvements to the pedestrian/cycle connectivity and inter-urban bus services, the development of the site is expected to increase the number of cars on the road overall, with adverse effects on this objective.

**4.60** The remaining sites were assessed as having a mixed minor positive and minor or significant negative effect because they are located within walking distance of one or no sustainable transport modes but are expected to bring improvements to pedestrian/cycle connectivity and inter-urban bus services, in addition to improvements to the wider strategic highway network. However, this may make driving a more attractive mode of travel, with adverse effects on this objective. The effect is recorded as uncertain because there may be potential to incorporate renewable energy production and energy efficiency measures.

## SA Objective 10: Biodiversity and Geodiversity

**4.61** Just under one half of sites were assessed as having a minor negative effect against this objective because they comprise greenfield land and are also located within close proximity of designated biodiversity sites, areas of ancient woodland and/or Regionally Important Geological or Geomorphological Sites (RIGS). Some of these effects are recorded as uncertain due to the presence of Ecosites, for which the wider biodiversity value is uncertain. Uncertainty is also recorded for any strategic sites because the actual effect will depend on the exact location and detailed design proposals of development.

**4.62** Around 15% of sites were assessed as having a significant negative effect against this objective because they contain designated biodiversity sites, areas of ancient woodland and/or RIGS. Sites have also been assessed as having a significant negative effect when they are located within a Site of Special Scientific Interest (SSSI) Impact Risk Zone for the relevant type of development or are within 100m of any SSSI. For some of these sites, the effect is recorded as uncertain due to the presence of Ecosites or because the site is a strategic site.

**4.63** Around one fifth of sites were assessed as having a mixed minor positive and significant negative effect against this objective because they contain designated biodiversity sites but are also required to enhance the green infrastructure network. All effects are recorded as uncertain due to the sole presence of ecosites and the fact all these sites are strategic and the actual effect will depend on the exact location and detailed design proposals of development.

**4.64** Approximately 10% of sites were assessed as having a mixed minor positive and minor negative but uncertain effect because they comprise greenfield land and/or are located within 100m of designated biodiversity assets, areas of

ancient woodland and/or RIGS but are also expected to make improvements to the green infrastructure network. The effects are recorded as uncertain for the reasons outlined above.

**4.65** The remaining sites are expected to have a negligible effect against this objective.

### SA Objective 11: Water Quality and Quantity

**4.66** Just under one third of sites are expected to have a minor negative but uncertain effect against this objective because they fall within a Source Protection Zone. All other sites are expected to have negligible effects against this SA objective.

### SA Objective 12: Flooding

**4.67** Three sites are expected to have a significant negative effect against this objective because they contain over 25% of land within Flood Zone 3: (1) HEL228a: St Albans Road, South Mimms; (2) HEL205: Land at Town Farm; and (3) HEL403: Newberries Car Park.

**4.68** Just under 10% of sites are expected to have a minor negative effect against this objective because they either contain more than 25% of land within Flood Zone 2 or a smaller area (5% to 25%) within Flood Zone 3.

**4.69** The remaining sites are expected to have a negligible effect against this objective.

### SA Objective 13: Air Quality

**4.70** Just under one third of sites are likely to have a significant negative effect against this objective because they are located within an AQMA or on roads closely connected to AQMAs and are therefore likely to generate traffic that passes through these AQMAs.

**4.71** Around one fifth of sites are expected to have a mixed minor positive and significant negative effect against this objective because although they are within or closely connected to an AQMA, improvements will be made to strategic pedestrian/cycle connectivity, as well as inter-urban bus services.

**4.72** A small number of sites are also expected to have a mixed minor positive and minor negative effect against this objective. These sites are expected to encourage people to use more sustainable modes of transport but the improvements to the wider strategic highway network may make driving a more attractive mode of travel. Despite this, none of the sites are likely to generate traffic that passes through an AQMA. One of the effects is recorded as uncertain because the Council has not yet decided how the site will be used (HEL176/B3: Bushey Golf and Country Club).

**4.73** The remaining sites are expected to have a negligible effect against this objective.

### SA Objective 14: Energy Efficiency

**4.74** All sites are expected to have a negligible effect against this objective. The effect is recorded as uncertain against one third of these sites because, due to their size, there is potential to incorporate renewable energy production and energy efficiency measures.

### SA Objective 15: Economy

**4.75** Just over 15% of sites are expected to have a significant positive effect against this objective because they are located within 500m of an existing employment area or key employment site. Some of these sites are also expected to have a significant positive effect because they will deliver 750 homes or more, and therefore would be expected to make provision for employment land.

**4.76** Around 15% of sites are expected to have a minor positive effect against this objective because they are located within walking distance of sustainable transport modes, a town or local centre, existing or key employment areas, and/or existing local employment sites.

**4.77** One site, HEL392/BE5: Elstree Way Corridor, is expected to have a mixed significant positive and minor negative effect against this objective because it is located adjacent to an existing employment site. However, the redevelopment of some parts of the site may result in the loss or relocation of existing small businesses.

**4.78** One site, HEL357/BE5: Oxhey Lane, is expected to have a significant negative effect against this objective because it is located over 2,000m from an existing or key employment area.

**4.79** Around one third of sites are expected to have a mixed significant negative and minor positive effect against this objective because they are located over 2,000m from an existing or key employment area, but are within 800m of at least one sustainable transport link, a town or local centre, or within 500m of an existing local employment site.

**4.80** Around one third of sites are expected to have a mixed minor positive and minor negative effect because they are located within or further than 800m of a sustainable transport link and/or a town or local centre, within 501-1,000m or 1,001-2,000m of an existing or key employment area, in addition to 500m from an existing local employment site. Some of these sites may result in the loss of an existing employment area.

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Table 4.4: SA scores for potential sites for employment

	SA 1: Education	SA 2: Services	SA 3: Housing Provision	SA 4: Community Cohesion	SA 5: Health	SA 6: Soil and Minerals	SA 7: Historic Environment	SA 8: Landscape	SA 9: Greenhouse Gas Emissions	SA 10: Biodiversity and Geodiversity	SA 11: Water Quality and Quantity	SA 12: Flooding	SA 13: Air Quality	SA 14: Energy Efficiency	SA 15: Economy
HEL171	0	0	0	0	--	-	-?	--	-?	--	0	0	--?	0	++
HEL208	0	0	0	0	--	-	-?	--	-?	--	-?	0	--?	0	++
HEL211	0	0	0	0	--	-	-?	-	-?	-?	-?	0	0?	0	++
HEL238 (EMP4)	0	0	0	0	--	-	0?	--?	-?	-	0	0	--?	0	++
HEL387b (EMP3 Safeguarded Site)	0	0	0	0	--	-	0?	-?	-?	-	0	-	--?	0	++
HEL394	0	0	0	0	--	-	-?	0	+	-?	-?	0	--?	0	++
HEL503	0	0	0	0	--	-	-?	--	-?	-	0	0	--?	0	++
HEL520b	0	0	0	0	--	-	0?	-	-?	--?	-?	0	--?	0	++
HEL600	0	0	0	0	--	+/-	-?	--	-?	--	0	-	--?	0	++
HEL604a	0	0	0	0	0	+/-	0?	--/+	--?	--?	0	0	0?	0	++
HEL604b	0	0	0	0	0	+/-	0?	--/+	--?	--?	0	0	0?	0	++
HEL802	0	0	0	0	--	-	-?	--?	--?	-	0	0	--?	0	++
HEL803	0	0	0	0	--	+/-	-?	--?/+?	--?	0	0	0	0?	0	++

# DRAFT

	SA 1: Education	SA 2: Services	SA 3: Housing Provision	SA 4: Community Cohesion	SA 5: Health	SA 6: Soil and Minerals	SA 7: Historic Environment	SA 8: Landscape	SA 9: Greenhouse Gas Emissions	SA 10: Biodiversity and Geodiversity	SA 11: Water Quality and Quantity	SA 12: Flooding	SA 13: Air Quality	SA 14: Energy Efficiency	SA 15: Economy
HEL804	0	0	0	0	0	+/-	--?	--?/+?	--?	-	0	0	0?	0	++
HEL805	0	0	0	0	0	+/-	-?	--?/+?	--?	-	0	0	0?	0	++
HEL806	0	0	0	0	0	+/-	0?	--?/+?	-?	-	-?	0	0?	0	+
HEL807	0	0	0	0	--	-	-?	--	+++?	--	-?	-	0?	0	++
HEL809	0	0	0	0	--	-	-?	--?	-?	-?	0	-	--?	0	++
HEL811	0	0	0	0	--	+/-	-?	--?/+?	--?	-	-?	-	--?	0	++
HEL812	0	0	0	0	--	-	-?	--	-?	-?	0	0	--?	0	++
HEL813	0	0	0	0	--	+/-	-?	--?/+?	-?	0	0	0	--?	0	+
HEL814	0	0	0	0	--	-	-?	--?	-?	-	0	0	--?	0	++
HEL816	0	0	0	0	--	-	-?	--	--?	-?	-?	0	--?	0	++
HEL817	0	0	0	0	0	-	-?	--	-?	-?	-?	0	0?	0	++
HEL818	0	0	0	0	--	-	-?	--?	-?	-	0	0	--?	0	++
HEL819	0	0	0	0	--	--	0?	-?	-?	-?	-?	0	--?	0	++
HEL820	0	0	0	0	--	--	-?	-?	-?	-?	0	0	--?	0	++



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	SA 1: Education	SA 2: Services	SA 3: Housing Provision	SA 4: Community Cohesion	SA 5: Health	SA 6: Soil and Minerals	SA 7: Historic Environment	SA 8: Landscape	SA 9: Greenhouse Gas Emissions	SA 10: Biodiversity and Geodiversity	SA 11: Water Quality and Quantity	SA 12: Flooding	SA 13: Air Quality	SA 14: Energy Efficiency	SA 15: Economy
HEL821	0	0	0	0	--	-	--?	--	-?	-?	-?	0	--?	0	++

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## Summary of SA Findings for Employment Sites

### SA Objective 1: Education

**4.81** Employment sites are considered to have a negligible effect on this objective.

### SA Objective 2: Services

**4.82** Employment sites are considered to have a negligible effect on this objective.

### SA Objective 3: Housing Provision

**4.83** Employment sites are considered to have a negligible effect on this objective.

### SA Objective 4: Community Cohesion

**4.84** Each employment site is expected to have a negligible effect in relation to this objective because none of them are located within the 20% most deprived areas with regard to the 'Barriers to housing and services' domain of the English Indices of Deprivation.

### SA Objective 5: Health

**4.85** The majority of employment sites are expected to have a significant negative effect in relation to this objective because they are each located within 200m of Hertsmere's strategic road network, where high pollution levels and noise disturbance could have an adverse effect on employees. The remaining sites are likely to have a negligible effect against this objective because they are not located within 200m of Hertsmere's strategic road network or close to an anaerobic digestion or waste management facility.

### SA Objective 6: Soil and Minerals

**4.86** The majority of employment sites are expected to have a minor negative effect against this objective because they are entirely or mainly located on greenfield land, comprise mainly Grade 3 agricultural land or a small proportion of Grades 1 or 2 agricultural land, and/or fall within a Mineral Consultation Area. Two sites (HEL819: Land to the North of Bell Lane, and HEL820: Land North of Salisbury Hall) are expected to have a significant negative effect because more than 25% of these sites is location on Grade 2 agricultural land.

**4.87** Around a third of employment sites are expected to have mixed minor positive and minor negative effects because they consist of brownfield land, but fall within a Mineral Consultation Area, or because they consist of part brownfield, part greenfield land.

### SA Objective 7: Historic Environment

**4.88** The majority of employment sites have the potential for minor adverse effects on the historic environment because they have potential to adversely affect the setting of one or more heritage assets.

**4.89** Two sites (HEL804: Home Farm and HEL821: Land to the West of Hilfield Farm) are expected to have significant negative effects on the historic environment as they could substantially alter the setting of historic assets or directly affect historic assets on site.

**4.90** The remaining sites have been judged to have a negligible effect on the historic environment.

**4.91** All effects are considered to be uncertain and will depend on the location and design of any development.

### SA Objective 8: Landscape

**4.92** Half of the employment sites are expected to have a significant negative effect against this objective because they fall within an area that has moderate-high or high sensitivity to the relevant type of development. The effects for strategic sites are recorded as uncertain because effects depend on the exact size, location and design of development.

**4.93** Five employment sites are expected to have a minor negative effect because they fall within an area that has low-moderate or moderate sensitivity to the relevant type of development.

**4.94** Over a quarter of employment sites are expected to have mixed significant negative and minor positive effect against this objective because although they consist of brownfield land, these sites fall within an area with moderate-high or high sensitivity to the relevant type of development.

**4.95** The remaining site is expected to have a negligible effect against this objective.

### SA Objective 9: Greenhouse Gas Emissions

**4.96** Around a third of sites are expected to have a significant negative but uncertain effect against this objective because they are not located within walking distance of any sustainable transport links. The effects are recorded as uncertain because the actual effects will depend on the employment use proposed at each site.

**4.97** The majority of remaining sites are expected to have a minor negative effect against this objective because they are located within walking distance of one sustainable transport mode. Again, the effect is recorded as uncertain because the actual effect will depend on the employment use proposed at these sites.

**4.98** Site HEL394: Safeguarded employment land, north west of Cranbourne Road Industrial Estate is expected to have a minor positive effect because it is within walking distance of two sustainable transport links and site HEL807: Bushey Hall Golf Club is expected to have a significant positive effect because it is within walking distance of three sustainable transport links. These effects are recorded as uncertain because the actual effect will depend on the employment use proposed at the site.

### SA Objective 10: Biodiversity and Geodiversity

**4.99** Around two thirds of employment sites are expected to have a minor negative effect in relation to this objective because they are located within close proximity to designated biodiversity assets. Some of these are recorded as uncertain, where Ecosites are the only designations present.

**4.100** A quarter the employment sites are expected to have a significant negative effect against this objective because they contain designated biodiversity assets. For some, this effect is recorded as uncertain as an Ecosite is the only designation present. Ecosites are considered to be of value for their semi-natural habitat features or species interest, but their wider biodiversity value is uncertain.

**4.101** Two employment sites are expected to have negligible effects on biodiversity and geodiversity.

### SA Objective 11: Water Quality and Quantity

**4.102** Just over a third of the employment sites are located within a Source Protection Zone, and therefore expected to have a minor negative effect with uncertainty against this objective. The remaining sites are expected to have a negligible effect.

### SA Objective 12: Flooding

**4.103** Five sites are expected to have a minor negative effect in relation to SA Objective 12: Flooding, because they contain between 5% and 25% of land within Flood Zone 3. The remaining sites are expected to have a negligible effect because they contain less than 25% of land within Flood Zone 2 and less than 5% of land within Flood Zone 3.

### SA Objective 13: Air Quality

**4.104** Around two thirds of sites are expected to have a significant negative effect against this objective because they are either located within an AQMA or are likely to generate traffic that uses a route with an AQMA as its primary access. The effect is recorded as uncertain against most of these sites because the actual effect will depend on the employment use proposed at them. The remaining sites are expected to have a negligible effect against this objective because they are not

likely to generate traffic that uses an AQMA. Again, the effect is recorded as uncertain.

### SA Objective 14: Energy Efficiency

**4.105** All employment sites are expected to have a negligible effect in relation to this SA objective because their location will not have an effect on levels of domestic energy consumption and the potential for renewable energy use. These factors are influenced more by the specific design and construction methods used, and whether renewable energy infrastructure is incorporated into development.

### SA Objective 15: Economy

**4.106** The majority employment sites are expected to have a significant positive effect in relation to SA Objective 15: Economy because they are over 0.5ha in size and will provide employment land and opportunities for business investment both of which will contribute towards economic growth. Two sites are expected to have a minor positive effect due to their smaller size.

# DRAFT

Table 4.5: SA scores for potential sites for mixed use sites

	SA 1: Education	SA 2: Services	SA 3: Housing Provision	SA 4: Community Cohesion	SA 5: Health	SA 6: Soil and Minerals	SA 7: Historic Environment	SA 8: Landscape	SA 9: Greenhouse Gas Emissions	SA 10: Biodiversity and Geodiversity	SA 11: Water Quality and Quantity	SA 12: Flooding	SA 13: Air Quality	SA 14: Energy Efficiency	SA 15: Economy
HEL171 (EMP1)	--	0	+	0	++/--	-	-?	--	-?	--	0	0	--?	0	++
HEL521	++?	-	+	+	++?/--?	-	--?	-	+	-	-?	0	--?	0	++
HEL700	++?	++	+	0	++/--	+?/-?	-?	0	-?	-	0	0	0?	0	++
HEL701	+	++	+	+	++/--	+?/-?	-?	0	+	0	0	0	0?	0	+

## Summary of SA Findings for Mixed Use Sites

### SA Objective 1: Education

**4.107** Sites HEL521: Bushey Hall Farm Site, Bushey Mill Lane and HEL700: Potters Bar Regeneration are expected to have a significant positive but uncertain effect against this objective because they are both located within 500m of a primary school and 1km of a secondary school in settlements where there is both primary and secondary school capacity. The effects are recorded as uncertain because it is unknown whether these schools will have capacity themselves or not.

**4.108** Site HEL171: Land North of Centennial Park is expected to have a significant negative effect on this objective because it is located further than 500m from a primary school and further than 1km from a secondary school.

**4.109** Site HEL701: Ford Garage, Potters Bar is likely to have a minor positive but uncertain effect because it is located within 1km of a secondary school in a settlement with capacity but over 500m from a primary school. The effect is uncertain because it is unknown whether the school will have capacity itself or not.

### SA Objective 2: Services

**4.110** Sites HEL700: Potters Bar Regeneration and HEL701: Ford Garage, Potters Bar are expected to have a significant positive effect against this objective because they are located within an area with 'high' and 'very high' accessibility, respectively.

**4.111** Site HEL521: Bushey Hall Farm Site, Bushey Mill Lane is expected to have a minor negative effect because it falls within an area with 'low' accessibility.

**4.112** Site HEL171/EMP1: Land North of Centennial Park is expected to have a negligible effect.

### SA Objective 3: Housing Provision

**4.113** All four sites are expected to have a minor positive effect against this objective because they are likely to provide fewer than 500 dwellings each.

### SA Objective 4: Community Cohesion

**4.114** Sites HEL521: Bushey Hall Farm Site, Bushey Mill Lane and HEL701: Ford Garage, Potters Bar are expected to have a minor positive effect against this objective because site HEL521 falls within one of the 20% most deprived areas in the Borough with regard to the 'Barriers to housing and services' domain in the English Indices of Deprivation, whilst HEL701 is less than 100m from a town centre. Therefore, development at

these sites is likely to help overcome barriers to housing and services. The remaining two sites are expected to have a negligible effect.

### SA Objective 5: Health

**4.115** All mixed use sites are expected to have a mixed significant positive and significant negative effect against this objective because they are located within 800m of open space, sport and recreation facilities, but are also located within 200m of Hertsmere's strategic road network. The effect for site HEL521: Bushey Hall Farm Site, Bushey Mill Lane is recorded as uncertain because the site contains a Public Right of Way.

### SA Objective 6: Soil and Minerals

**4.116** Sites HEL171: Land North of Centennial Park and HEL521: Bushey Hall Farm Site, Bushey Mill Lane are expected to have a minor negative effect against this objective because they are both located on Grade 3 agricultural land and within a Minerals Consultation Area.

**4.117** Sites HEL700: Potters Bar Regeneration and HEL701: Ford Garage, Potters Bar are expected to have a mixed minor positive and minor negative but uncertain effect against this objective because they are located on brownfield land but also fall within a Minerals Consultation Area.

### SA Objective 7: Historic Environment

**4.118** Of the four mixed use site options, one has the potential for significant negative effects to the historic environment as a result of there being designated assets close to the site and the potential for substantial harm to these (HEL521: Bushey Hall Farm Site, Bushey Mill Lane).

**4.119** The remaining sites have the potential for minor adverse effects on the historic environment.

### SA Objective 8: Landscape

**4.120** Site HEL171/EMP1: Land North of Centennial Park is expected to have a significant negative effect against this objective because it is located within an area with 'high' sensitivity to the relevant type of development.

**4.121** Site HEL521: Bushey Hall Farm Site, Bushey Mill Lane is expected to have a minor negative effect because it falls within an area considered to be 'moderate' with regards to sensitivity to development.

**4.122** The remaining two sites are expected to have a negligible effect.

## SA Objective 9: Greenhouse Gas Emissions

**4.123** Sites HEL521: Bushey Hall Farm Site, Bushey Mill Lane and HEL701: Ford Garage, Potters Bar are likely to have a minor positive but uncertain effect against this objective because they are located within walking distance of two sustainable transport modes.

**4.124** Sites HEL171: Land North of Centennial Park and HEL700: Potters Bar Regeneration, on the other hand, are located within walking distance of one sustainable transport link and are therefore expected to have a minor negative effect.

**4.125** All effects are recorded as uncertain because the actual effects will depend on the employment use proposed at each site.

## SA Objective 10: Biodiversity and Geodiversity

**4.126** Site HEL171: Land North of Centennial Park is expected to have a significant negative uncertain effect against this objective because a substantial proportion of the site contains part of an Ecosite.

**4.127** Sites HEL521: Bushey Hall Farm Site, Bushey Mill Lane and HEL700: Potters Bar Regeneration are expected to have a minor negative effect because they are located within 100m of a designated site.

**4.128** Site HEL701: Ford Garage, Potters Bar is expected to have a negligible effect against this objective.

## SA Objective 11: Water Quality and Quantity

**4.129** Site HEL521: Bushey Hall Farm Site, Bushey Mill Lane is likely to have a minor negative but uncertain effect against this objective because is located within a Source Protection Zone. The remaining sites are assessed as having a negligible effect because they are not located within a Source Protection Zone.

## SA Objective 12: Flooding

**4.130** All sites are expected to have a negligible effect in relation to this objective.

## SA Objective 13: Air Quality

**4.131** Sites HEL171: Land North of Centennial Park and HEL521: Bushey Hall Farm Site, Bushey Mill Lane are expected to have a significant negative but uncertain effect against this objective because they could generate traffic that passes through an AQMA. The effects are recorded as uncertain because the actual effect will depend on the employment use proposed at each site.

**4.132** The remaining sites are expected to have a negligible uncertain effect.

## SA Objective 14: Energy Efficiency

**4.133** All sites are expected to have a negligible effect in relation to this SA objective because their location will not have an effect on levels of domestic energy consumption and the potential for renewable energy use. These factors are influenced more by the specific design and construction methods used, and whether renewable energy infrastructure is incorporated into development.

## SA Objective 15: Economy

**4.134** Sites HEL171: Land North of Centennial Park, HEL521: Bushey Hall Farm Site, Bushey Mill Lane and HEL700: Potters Bar Regeneration are expected to have a significant positive effect in relation to SA Objective 15: Economy because they are each over 0.5ha in size and will provide employment land and opportunities for business investment both of which will contribute towards economic growth. Site HEL701: Ford Garage, Potters Bar is expected to have a minor positive effect because it is of a smaller size but is located within 800m of sustainable transport links and a town centre.

## Mitigation

**4.135** The following section outlines mitigation measures that could help to reduce the potential minor and significant negative effects of the site allocation options with regards to each SA objective. A draft version of this section was issued to the Council at an earlier stage in the SA process, following an initial assessment of the site options. The green boxes below identify where these mitigation suggestions have been addressed in the Draft Local Plan, where relevant. Mitigation and recommendations for the Draft Local Plan as a whole are set out in **Chapter 6**.

**4.136** In many cases, these mitigation measures could be addressed through inclusion in relevant development management (DM) policies within the Local Plan, but certain measures relating to specific sites should be included in any relevant site allocation policy; where this is the case, our recommendations are highlighted in bold text. Note that some mitigation suggestions are outside the scope of the Local Plan.

## SA Objective 1: Education

**4.137** Around a third of sites were identified as having likely negative effects on SA Objective 1 (Education), with most of these effects being significant negative effects as the sites are further than 1km from a secondary school and further than 500m from a primary school. Additionally, most positive effects



identified are uncertain, as capacity information was only available at settlement level, rather than for individual schools.

**4.138** The Council will need to work with the County Council to ensure that there is sufficient school capacity to accommodate new development, either through provision of new facilities or expansion of existing facilities – this should be committed to in an infrastructure delivery policy. Where primary and/or secondary schools are not currently within walking distance of a site (1km and 500m respectively), ideally a new facility would be provided in proximity to the relevant sites. Where this is not practical, suitable sustainable transport should be provided and subsidised to ensure pupils can get to school. Cycle / scooting schemes and walking buses to get pupils to school should also be encouraged.

Through Policy H10: Housing Land, a number of the strategic sites allocated in the plan are required to include education provision, safeguard land for education or contribute to improving education provision in the local area.

### SA Objective 2: Services

**4.139** Sites that fall within areas with 'Low' or 'Very low' accessibility or which may result in the loss of a public facility, are identified as having potential negative effects with regards to SA Objective 2 (Services).

**4.140** Site HEL220 falls within Porters Park Golf Club and contains the Club House buildings. Its development will therefore result in the partial loss of this private facility. However, development would require re-provision of the Club House buildings elsewhere.

**4.141** A development management policy that sets out standards for services/facilities/assets (e.g. one Local Centre per 1,000 people) and safeguards land for certain uses (e.g. a village green), could be included. A development management policy could also be included that seeks to maximise sustainable transport opportunities in order to increase people's accessibility to local services, particularly where it is not possible to provide additional services locally.

Policies LF1 to LF6 seek to protect and enhance local facilities, including community facilities, open space, sports and recreation facilities. Policy LF4: Open Space and Recreation Facilities Standards for new development sets standards for provision of outdoor space and recreation facilities. The plan does not set standards for other types of services and facilities, but Policy LF2: New or Enhanced Social and Community Facilities sets out the community infrastructure and facilities to be provided at various site allocations, and Policy H10: Housing Land sets out the new services and

facilities to be delivered at strategic site allocations. In addition, policies ST1 to ST4 promote improved accessibility and sustainable transport connections.

### SA Objective 3: Housing Provision

**4.142** As no proposed allocated sites would result in the net loss of dwellings, no sites were identified to have potential negative effects. Therefore, no mitigation is proposed with regards to SA Objective 3 (Housing Provision).

### SA Objective 4: Community Cohesion

**4.143** No negative effects were recorded in relation to SA Objective 4 (Community Cohesion), as levels of crime and fear of crime will be more strongly influenced by detailed design proposals than the location of development sites. Whilst the assessment also considered whether the sites are within one of the 20% most deprived areas and proximity to local centres, negative effects were not identified in relation to these. Therefore, no mitigation is proposed with regards to SA Objective 3 (Housing Provision).

### SA Objective 5: Health

**4.144** A large number of sites were identified as having negative effects in relation to SA Objective 5 (Health) because they are located within 200m of Hertsmere's strategic road network and, in many cases, are located outside of Potters Bar and Bushey which are the only settlements identified as having capacity in their GP surgeries to meet the needs of a growing population. One site, HEL506: South of Allum Lane, was also identified as having likely negative effects because it is within close proximity to a waste management facility. In some instances, negative effects were also identified because development would result in the loss of an existing public facility (e.g. open space).

**4.145** If a site is located within close proximity to A roads and/or a motorway, policies could require mitigation in the form of tree planting along site boundaries, in order to help reduce noise and air pollution at the site. Development management policies and site allocation policies should seek to promote a healthy and active lifestyle, including through the provision of open space and sustainable transport modes, such as the provision of additional cycle routes and extended bus routes. Development that may result in the loss of an existing public facility should ensure that there is sufficient replacement/alternative public facilities, in a location easily accessible by current users and new residents/workers, to mitigate the potential loss and provide for the needs of the new development.

**4.146** For site HEL506, the ability to mitigate noise and odour is limited but the allocation policies could require a landscape

buffer that helps reduce the impact of the waste management facility.

As set out above for SA objective 2: Services, the plan seeks to protect and enhance community facilities, open space, sports and recreation facilities, as well as promoting sustainable travel, including walking and cycling. In particular, Policy LF2: New or Enhanced Social and Community Facilities sets out requirements for new healthcare provision. Some policies require mitigation with regards to noise and air pollution through planting, such as Policy E4. Policy ENV1: Environmental Impact of Development states that development should not be sites near to existing significant sources of noise, light, odour or other pollution, unless it can be shown that mitigation measures would be successful in reducing impacts to an acceptable level. However, it is recommended that site-specific mitigation is included for those sites identified in the SA as being at risk of air and noise pollution.

Site HEL506 is not allocated in the plan, therefore no mitigation for this particular site is required.

## SA Objective 6: Soil and Minerals

**4.147** Sites located on greenfield land, including the best and most versatile agricultural land would result in the permanent loss of this land and are therefore identified as having potential negative effects with regards to SA Objective 6 (Soil and Minerals). Sites located within 250m of a Minerals Consultation Area are also identified as having potential negative effects, as development may result in sterilisation of mineral resources. These effects cannot be avoided without relocating proposed development sites.

**4.148** It is recommended that a development management policy that promotes the use of previously developed land and minimises the use of best and most versatile agricultural land is included.

Policy ENV6: Agricultural land seeks to protect best and most versatile agricultural land and Policy ENV13: Mineral Consultation Area seeks to ensure that mineral resources are not sterilised by development and requires the Mineral Planning Authority (Hertfordshire County Council) to be consulted with where mineral resources may be affected.

## SA Objective 7: Historic Environment

**4.149** The majority of sites were identified as having negative effects with regards to SA Objective 7 (Historic Environment). This was often due to a site being close to or containing a designated asset, having archaeological potential as

demonstrated by the presence of undesignated assets, or a combination of these.

**4.150** It is recommended that a development management policy that seeks to protect and enhance the historic environment is included. The Local Plan should require applications that result in a material or setting change to a built heritage asset to include a heritage statement that provides a detailed assessment of the significance and potential impacts to the asset(s). This would provide site specific recommendations for mitigation.

**4.151** The Local Plan should also require applications that are likely to result in the loss of below ground archaeological heritage assets to include an historic environment assessment. This would provide a detailed assessment of the nature and extent of any potential archaeological remains within the site, an impact assessment and site specific recommendations for mitigation.

**4.152** At planning application stage, Hertsmere Borough Council could set out a number of conditions as part of the application approval, if applicable. This could include the requirement for archaeological fieldwork.

**4.153** In all cases consultation should be sought with Hertfordshire County Council to confirm the appropriate mitigation strategy and planning requirements.

Policies HE1 to HE4 seek to protect and enhance the historic environment, including above and below ground assets.

## SA Objective 8: Landscape

**4.154** The majority of sites were identified as having negative effects with regards to SA Objective 8 (Landscape) because they were identified as falling within an area of 'moderate-high' or 'high' sensitivity to the relevant type of development in Hertsmere's Landscape Character Assessment and, in some instances, contributing towards settlement coalescence. Some sites located on brownfield land and within settlement boundaries were identified as resulting in a loss of landscape features (e.g. green space or water bodies). Proposals for development at such sites should be required to set out how the effects of development on key landscape features would be mitigated. In addition, developments should be designed to avoid the most sensitive areas and incorporate and enhance green infrastructure.

**4.155** A development management policy that requires good design, by promoting development that is sensitive to its surroundings should be provided, therefore helping to minimise and mitigate any potential negative effects.

**4.156** At planning application stage, Hertsmere Borough Council could set out a number of conditions as part of the application approval, if applicable. These could range from hard and soft landscaping to the materials used in construction, to the external surfaces of development.

Policy DL2: High Quality, Safe and Accessible Development seeks to ensure development is appropriately designed and Policy ENV7: Trees, Landscape and Development requires development to protect existing landscape features and to create new areas of landscape interest.

### SA Objective 9: Greenhouse Gas Emissions

**4.157** A large proportion of sites were identified as having potential negative effects with regards to SA Objective 9 (Greenhouse Gas Emissions) because they are not located within walking distance any sustainable transport links or are only located within close proximity of one sustainable transport link. Additional sustainable transport provision, such as cycle routes and extended bus routes, should be required through local plan policies.

Policies SG1: Creating Sustainable Development and CC2: Greenhouse Gas Reductions are focused on reducing greenhouse gas emissions, including requiring many developments to achieve net zero greenhouse gas emissions. Additionally, policies ST1: Strategic Approach to Transport, ST3: Reducing Emissions and Promoting Health and Wellbeing, ST5: Electric Vehicles and Mobility Initiatives promote sustainable travel and transport, including reducing the need to travel and low-carbon travel. In addition, Policy H10 sets out sustainable transport requirements for each of the strategic housing site allocations.

### SA Objective 10: Biodiversity and Geodiversity

**4.158** Sites comprising (>=25%) or falling within close proximity (<=100m) of designated biodiversity assets, SSSIs, ancient woodland and/or RIGS, in addition to falling within relevant SSSI Impact Risk Zones, were identified as having potential negative effects with regards to SA Objective 10 (Biodiversity and Geodiversity). To mitigate the potential negative effects of new development on these assets, developments should be designed to avoid and incorporate buffers around the most sensitive parts of the assets and consider measures to reduce recreational pressures, such as via the provision of Suitable Alternative Natural Green Spaces (SANGs) to facilitate on-site recreation. In addition, developments should be encouraged to incorporate green infrastructure within the allocated site in order to support the

creation of new habitats and species, and wider habitat connectivity.

**4.159** A development management policy that contains a target for biodiversity net gain and requires developers to submit a Biodiversity Net Gain Plan could be included in the Local Plan, following the publication of the Environment Bill. A development management policy that seeks to protect, conserve and enhance both designated and non-designated biodiversity assets, in addition to geological features (e.g. SSSIs and RIGS), should also be provided to help mitigate the negative effects on these assets, associated with development.

**4.160** Where sites are likely to have an adverse effect on biodiversity, Hertsmere Borough Council could set out a number of conditions as part of the approval for development, if applicable. These planning conditions could ensure that no trees, scrub or hedges are removed, and that external lighting is only permitted if it does not disrupt established habitats and species in the area.

Policies ENV3: Biodiversity Strategy and ENV4: Sites of Biodiversity Value promote conservation and enhancement of biodiversity. In particular, Policy ENV3 requires development to secure net gains for biodiversity.

While the plan does not require SANGs, Policy LF4: Open Space and Recreation Facilities Standards for new development sets standards for provision of outdoor space and recreation facilities.

### SA Objective 11: Water Quality and Quantity

**4.161** Sites located within Source Protection Zones were identified as having potential negative effects with regards to SA Objective 11 (Water Quality and Quantity). Source Protection Zones are groundwater sources used for public drinking water supply and show the level of risk of contamination from activities on or in the ground that have potential to cause groundwater pollution and affect water quality. To mitigate the risk of water pollution, development should be located outside of Source Protection Zones if possible, particularly SPZ1. The Local Plan should require that where development is located within an SPZ, the applicant must provide evidence that this will not impact groundwater quality. Further measures may be required to prevent potential pollution incidents during construction, including required careful handling of materials and spill response plans.

**4.162** A development management policy that only supports development where it will not negatively impact groundwater should be provided, requiring an assessment of risk to

groundwater if development occurs in a Source Protection Zone.

Policy ENV9: Groundwater Source Protection Zones seeks to ensure that groundwater quality is protected, particularly in SPZs.

## SA Objective 12: Flooding

**4.163** Sites located within Flood Zones 2 and/or 3 are identified as having potential negative effects with regards to SA Objective 12 (Flooding), as these sites are more susceptible to flooding. Where possible, design of new development within these sites should avoid those parts of the site at highest risk of flooding, which could be retained as green space. Developments should utilise SuDS to help mitigate the risk of flooding by safely managing surface water. These SuDS could be designed to perform multiple functions, for example by acting as a landscape and/or biodiversity feature. In areas where it is not possible to install SuDS (e.g. in areas with less permeable soils), alternative surface water drainage could be installed.

**4.164** A development management policy that encourages development outside of Flood Zones 2 and 3, and requires the incorporation of SuDS into new development, should be provided. The plan should also require a flood risk assessment where necessary. Where a preferred site is known to be at high risk of flooding, the allocation policy itself should incorporate site specific mitigation measures:

- **Site HEL228a:** The northern half of this site falls within Flood Zone 3 and is therefore at high risk of flooding. Therefore, **development within this site should take place towards the south and incorporate SuDS where possible.**
- **Site HEL228b:** The southern quarter of this site falls within Flood Zone 3 and is therefore at high risk of flooding. Therefore, **development within this site should take place towards the north and incorporate SuDS where possible.**
- **Site HEL205:** Around half of this site falls within Flood Zone 3. Therefore, **development should take place away from the areas at high risk from flooding and incorporate SuDS where possible.**
- **Site HEL216:** A very small proportion of this site falls within Flood Zone 3. **Development can easily avoid the area that falls within Flood Risk 3.**
- **Site HEL403:** Almost the entire site falls within Flood Zone 3. It would therefore be **beneficial to incorporate SuDS and focus development to the southern end of the site where flood risk is not high.**

- **Site HEL378b/EMP3 (Safeguarded Site):** The site contains two areas of land that fall within Flood Zone 3. It would therefore be **beneficial to incorporate SuDS and focus development away from these two areas.**
- **Site HEL600:** The eastern quarter of this site falls within Flood Zone 3. Therefore, **development within this site should take place towards the west and incorporate SuDS where possible.**
- **Site HEL251/PB2:** Potters Bar Brook runs through this site and it is therefore split into two halves by land that falls within Flood Zone 3. It would therefore be **beneficial to incorporate SuDS and focus development away from this central area.**
- **Site HEL385a/SM1:** The southern edge of this site falls within Flood Zone 3. It would therefore be **beneficial to incorporate SuDS and focus development away from the southern edge of the site.**
- **Site HEL385b/SM2:** An area in the southern end of this site falls within Flood Zone 3. Therefore, **development within this site should be focused away from this area and incorporate SuDS where possible.**
- **Site HEL385c/SM3:** An area in the northern end of this site falls within Flood Zone 3. Therefore, **development within this site should be focused away from this area and incorporate SuDS where possible.**

Policy ENV10 requires development to reduce any existing flood risk within or in proximity to the site and requires a flood risk assessment for any development proposed within a flood risk area. In addition, Policy ENV11: Sustainable Drainage Systems, Grey Water Recycling and Water Management requires larger new developments to integrate SuDS. In addition, Policy H10 requires most strategic development with higher risk of flooding to avoid higher risk part so the site or only locate flood-compatible uses there.

## SA Objective 13: Air Quality

**4.165** Sites located within an AQMA, or likely to generate traffic within an AQMA, are identified as having potential significant negative effects with regards to SA Objective 13 (Air Quality). To mitigate the effects of development on air quality, car-free developments could be pursued where strong active and public transport links exist, and sustainable transport modes promoted (e.g. cycling). Where car-free development is unachievable, electric car use could be encouraged through the provision of electric charging points, in addition to car sharing schemes. Development should be located within easy walking distance of services and facilities to discourage use of the private car.



**4.166** A development management policy should be provided that promotes sustainable modes of transport through the provision and/or enhancement of footpaths and cycle routes, in addition to improved local bus services and electric charging points. Development should be encouraged away from AQMAs and where this is not possible, tree growing, and vegetation should be promoted.

Policies ENV1: Environmental Impact of Development and ST3: Reducing Emissions and Promoting Health and Wellbeing both seek to minimize air pollution and ENV1 in particular seeks to prevent development that would exacerbate poor air quality within AQMAs and prevent development that would lead to new AQMAs being declared. Additionally, policies ST1: Strategic Approach to Transport, ST5: Electric Vehicles and Mobility Initiatives promote sustainable travel and transport, including reducing the need to travel. The plan also promotes net zero carbon developments (especially at Bowmans Cross New Settlement).

#### SA Objective 14: Energy Efficiency

**4.167** The location of housing and employment allocations will have a very limited effect on levels of energy consumption and the potential for renewable energy use. However, strategic sites may have more potential to incorporate renewable energy production and energy efficiency measures than smaller sites, but whether these will be incorporated into development is uncertain. Overall, no mitigation is proposed with regards to SA Objective 14 (Energy Efficiency).

#### SA Objective 15: Economy

**4.168** Sites further than 800m from sustainable transport links and/or Town and Local Centres, and which are over 1001m from employment areas, are identified as having potential negative effects with regards to SA Objective 15 (Economy). Development should ensure there are good connections between sites and Town/Local Centres and employment areas.

**4.169** A development management policy should be provided that promotes town centre development, in addition to improved sustainable transport connections between sites and Local/Town Centres. Employment development should also be promoted through policy. The Local Plan could encourage co-location of employment and housing development and improvements to Broadband connectivity, which would enable a large number of people to work near to or from home.

Policies E1 to E10 seek to boost the local and regional economy, as well as providing a sufficient number and variety of employment opportunities for those in the

Borough. This includes Policy E7: A Flexible Local Economy, which seeks to accommodate greater home and site-based working, as well as promoting full fibre connectivity. Policies ST1 to ST4 promote improved accessibility and sustainable transport connections.

## Recommendations

**4.170** This section summarises those residential and employment site options that perform best, based solely on how well they perform against the SA objectives (not taking into account any of the mitigation discussed above). However, it should be noted that the SA findings are not the only factor influencing the Council's decisions on sites to be allocated in the Local Plan, as other planning considerations such as deliverability and viability, meeting the required quantum of housing and employment land, fit with overall spatial strategy and plan objectives will also be taken into account. An earlier version of this part of the SA Report was shared with the Council in March 2020. The green boxes below identify whether the particular sites discussed below are allocated in the Draft Local Plan, where relevant. The Council's justification for selecting the sites proposed to be allocated in Local Plan (and discounting the alternatives) are set out in **Appendix I** of this SA Report.

#### Residential Site Options

**4.171** Of the residential site options, the following residential sites perform relatively well, as they are expected to have a number of positive effects and more limited negative effects:

- HEL216: Land West of Potters Bar Station
- HEL392/BE5: Elstree Way Corridor
- HEL362/PB3: Wrotham Park, West Barnet Road, East Baker Street
- HEL347/BE3: Land to North East of Cowley Hill
- HEL376: Land at Well End Road

**4.172** Site HEL216 arguably performs the best of all sites, as it is expected to result in a number of significant positive effects and no significant negative effects. Of the above sites, potential negative effects were identified against SA 5: health, SA 6: soil and minerals, SA 7: historic environment, SA 8: landscape, SA 9: greenhouse gas emissions, SA 10: biodiversity and geodiversity, and SA 13: air quality. In addition, HEL216 is also expected to result in minor negative effects on SA 12: flooding and HEL392/BE5 is expected to result in minor negative effects (mixed with significant positive effects) on SA 15: economy. It is considered that most of these effects could be mitigated, as described above.

**4.173** The best performing site options are generally those consisting of previously developed land in the urban area (for example HEL216 is currently a car park). This is because these sites tend to be closer to local services, facilities and transport links and can help promote regeneration. However, it is acknowledged that just allocating the sites listed above would fall far below the housing target. In addition, many of these are smaller sites, which are generally less likely to provide new and/or improved infrastructure, such as local shops, community facilities and recreational space. Therefore, it may be necessary to allocate additional site options where potential negative effects on more of the SA objectives have been identified. Provided the negative effects can be avoided, or if not, mitigated through the use of relevant DM policies and/or specific measures within site allocation policies (as referred to in the Mitigation section above), then it should be reasonable to allocate site options not listed above.

**4.174** The following site option is identified as having largely negative effects with regards to a higher number of SA objectives (and having fewer positive effects) and therefore, if allocated, suitable avoidance and mitigation measures (as described above) would need to be required within its accompanying site allocation policy:

- HEL367: Land West of Watling Street I&O

**4.175** Whilst some positive effects are expected with regards to these site options, they are likely to have negative effects, particularly in relation to SA 1: education, SA 2: services, SA 5: health, SA 6: soils and minerals, SA 7: historic environment, SA 8: landscape, SA 9: greenhouse gas emissions, SA 10: biodiversity and geodiversity, SA 13: air quality and SA 15: economy. With regards to all site options, most potential negative effects identified could be mitigated to some extent as described above in the Mitigation section. However, it is not possible to mitigate loss of greenfield land and best and most versatile agricultural land (relevant to SA 6).

All those sites identified as best performing are allocated in the Local Plan, with the exception of site HEL376. The worst performing site, HEL367, is not allocated in the Local Plan.

### Employment Site Options

**4.176** Of the employment site options, the following perform relatively well, as they are expected to have a number of positive effects and more limited negative effects:

- HEL604a: Elstree Aerodrome, South of the Runway.
- HEL604b: Elstree Aerodrome, North of the Runway.
- HEL803: Hilfield Farm.

- HEL804: Home Farm.

**4.177** These sites perform similarly against most SA objectives. Potential negative effects for these sites were recorded against SA 5: health (HEL803 only), SA 6: soil and minerals, SA 7: historic environment, SA 8: landscape, SA 9: greenhouse gas emissions, SA 10: biodiversity and geodiversity. However, the Mitigation section outlined above sets out ways to reduce the effects of employment and mixed use development at these sites.

**4.178** The following site options are identified as having largely negative effects with regards to a higher number of the SA objectives and therefore, if allocated, suitable avoidance and mitigation measures would need to be required within the accompanying site allocation policies:

- HEL208: Land between A41 & M1 Bushey.
- HEL600: Charleston paddocks, South Mimms Services.
- HEL520b: Land to the South East of Costco, North Western Avenue.
- HEL503: Adjacent to Lismirrane Industrial Estate.

**4.179** With regards to all site options, most potential negative effects identified could be mitigated to some extent as described above in the Mitigation section. However, it is not possible to mitigate loss of greenfield land and best and most versatile agricultural land (relevant to SA 6). Additionally, development within a Minerals Safeguarding Area may also be difficult to mitigate, unless prior extraction of the safeguarded mineral takes place before development begins on-site (also relevant to SA 6).

HEL604a is allocated in the Draft Local Plan and Elstree Aerodrome is identified as a Special Policy Area. HEL803 and HEL804 are not allocated.

Sites HEL600 and HEL503 are also allocated in the Draft Local Plan. However, Policy E4 provides mitigation for the adverse effects identified with HEL600 in regard to health/air pollution, landscape and flooding. Other policies in the Draft Local Plan provide mitigation for adverse effects identified to some extent, as described under 'Mitigation' above.

### Mixed Use Site Options

**4.180** Of the mixed use site options, sites HEL700: Potter Bar Regeneration and HEL701: Ford Garage, Potters Bar perform best, with site HEL171: Land North of Centennial Park performing worst.

**4.181** These sites perform similarly against most SA objectives, although site HEL171: Land North of Centennial Park is the only mixed use site expected to have significant



negative effects against SA 1: education, SA 8: landscape and SA 10: biodiversity and geodiversity.

**4.182** With regards to all site options, most potential negative effects identified could be mitigated to some extent as described above in the Mitigation section. However, it is not possible to mitigate loss of greenfield land and best and most versatile agricultural land (relevant to SA 6). Additionally, development within a Minerals Safeguarding Area may also be difficult to mitigate, unless prior extraction of the safeguarded mineral takes place before development begins on-site (also relevant to SA 6).

HEL521 is the only mixed use site option (other than Bowmans Cross New Settlement, which is included under 'housing') to be allocated in the Draft Local Plan. This site performs moderately well and Policy H10 requires retention of the public right of way through the site, as well as provision of public open space. Other potential adverse effects identified are largely expected to be mitigation by other policies in the Draft Local Plan, as described under 'Mitigation' above.

# Chapter 5

## Sustainability Appraisal

### Findings for the Draft Local Plan

**5.1** This chapter sets out the findings of the SA in relation to the vision, strategic objectives and policies presented in the Draft Local Plan. The assessments are presented by the chapter they appear in.

**5.2** The policy appraisals below consider each policy on its own merits to ensure clear recognition of effects any one particular policy is likely to result in. As such, the assessments in this chapter do not take into account any mitigation measures provided by other Draft Local Plan Policies, or any of the mitigation measures discussed with regards to site options appraisals in **Chapter 4**. Cumulative effects of the Local Plan as a whole are considered in **Chapter 6**. **Chapter 6** also sets out recommendations and suggested mitigation for the residual effects of the plan as a whole.

## Local Plan Vision and Strategic Objectives

### Vision

SA Objective	Vision
1. Education	+
2. Services and facilities	++
3. Housing provision	++
4. Community cohesion	+
5. Health	++
6. Soil and minerals	+
7. Historic environment	+
8. Landscape	+
9. Greenhouse gas emissions	++
10. Biodiversity and geodiversity	+?
11. Water quality and quantity	+
12. Flooding	+
13. Air quality	++

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SA Objective	Vision
14. Energy efficiency	+
15. Economy	++

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**5.3** The aspirational nature of the Vision means that all identified effects are positive. In terms of housing, the Vision is explicit in stating that an appropriate amount of homes will be provided and that there will be a range of types, sizes, prices and tenures to meet a range of needs. Therefore, a significant positive effect is identified in relation to SA objective 3 (housing). It is also stated in the Vision that growth will be supported by appropriate, resilient, high quality social and economic infrastructure to meet the needs of new residents. This is supported through the Vision's aspirations to create town centres that provide a range of retail, leisure and community facilities. As a result, a significant positive effect is expected in relation to SA objective 2 (services and facilities).

**5.4** There is emphasis in the Vision on reducing the need to travel through sustainably located development with access to active and public transport links. It is stated that new development will achieve net zero and reflect the principles of the circular economy. Additionally, the inclusion of high-speed digital connectivity for all in the Vision is important in reducing the need for people to travel to work where home working has become more prevalent, particularly in light of the Covid-19 pandemic. A significant positive effect is therefore identified in relation to SA objective 9 (greenhouse gas emissions). A significant positive effect is identified in relation to SA objective 13 (air quality), as the Vision aspires to improve connectivity for non-private car journeys between neighbouring towns. The Vision's goal for development to achieve net-zero is likely to require investment into energy efficiency and therefore a minor positive effect is identified in relation to SA objective

**5.5** The Vision's commitment to protecting and enhancing Hertsmere's natural environment, including blue and green infrastructure, offers potential to support biodiversity in the borough. The vision states that impacts of development should be offset through improvements to biodiversity. A significant positive effect is therefore expected in relation to SA objective 10 (biodiversity and geodiversity). However, this is uncertain as the mitigation hierarchy should be followed in terms of protecting and enhancing biodiversity in the first instance, and only offsetting where this is not possible. Enhancement of green and blue infrastructure assets is also likely to be of value to the wellbeing of Hertsmere residents. Health and wellbeing is a focal point of the Vision, with it being stated that health should be embedded into all aspects of development. This includes access to a range of healthcare facilities and creation of inclusive, connected places, spaces and buildings. As such, a significant positive effect is identified in relation to SA objective 5 (health). The aspirations for inclusivity and creation of places which will provide opportunities for people to meet mean that a minor positive effect is identified in relation to SA objective 4 (community cohesion).

**5.6** The Vision states that the close relationship with surrounding countryside will be safeguard and improvements will be made to offset impacts of development, which could help retain and enhance the attractiveness of the countryside. In addition, the Vision states that Hertsmere will be an attractive place to live. Therefore, a minor positive effect is identified in relation to SA objective 8 (landscape). The Vision also recognises that Hertsmere's distinctive character is supported by the character and setting of heritage assets and therefore it makes a commitment to their protection and enhancement. A minor positive effect is therefore identified in relation to SA objective 7 (historic environment). The Vision also states that land will be used efficiently, which may afford some protection to quality soils in the borough and encourage use of previously developed land. As such, a minor positive effect is expected in relation to SA objective 6 (soils and minerals).

**5.7** Other environmental concerns addressed through the Vision include flooding and water quality, as it is stated that flood risk and all forms of pollution will be avoided, reduced and mitigated. As a result, minor positive effects are identified in relation to SA objective 11 (water quality) and SA objective 12 (flood risk).

**5.8** The Vision sets out to deliver a strong and competitive local economy, which will allow key sectors (particularly film and television) to flourish. The Vision suggests that business will be supported by appropriate infrastructure and that changing work practices and travel behaviours will be facilitated. This includes providing a range of employment opportunities in town centre locations. As a result, a significant positive effect is identified in relation to SA objective 15 (economy). There is a strong focus on enhancing Hertsmere's status as a centre for creative industries. The Vision states that creative and media-related businesses of all skill levels will be encouraged to thrive. This may provide education and training opportunities for residents and therefore a minor positive effect is expected in relation to SA objective 1 (education).

## Strategic objectives

**5.9** Given the large number of Strategic Objectives, assessments are presented in three sections, each considering six to eight Strategic Objectives. It is noted that Section 3 of the Local Plan also sets out local objectives for the settlements in Hertsmere. Local objectives have not been subject to SA, as they reflect the strategic objectives and the content of the plan itself.

# DRAFT

## Strategic Objectives 1-6

SA objective	Strategic Objective 1	Strategic Objective 2	Strategic Objective 3	Strategic Objective 4	Strategic Objective 5	Strategic Objective 6
1. Education	0	0	0	0	+	0
2. Services and facilities	+	0	+	0	++	+
3. Housing provision	0	0	++	++	0	++
4. Community cohesion	0	++	+	0	0	0
5. Health	0	0	+	0	+	0
6. Soil and minerals	0	0	0	0	0	0
7. Historic environment	0	+?	0	0	0	0
8. Landscape	0	++	0	0	0	0
9. Greenhouse gas emissions	+	0	0	0	+	0
10. Biodiversity and geodiversity	0	+?	0	0	0	0
11. Water quality and quantity	0	+?	0	0	0	0
12. Flooding	0	0	0	0	0	0
13. Air quality	+	0	0	0	+	0
14. Energy efficiency	0	0	0	0	0	0
15. Economy	0	0	++	0	0	0

**5.10** The scale of housing delivery proposed in Strategic Objective 3 will require significant land take, the majority of which is likely to be on greenfield land. This may result in the loss of high quality soils or mineral resources. This may also have adverse impacts on biodiversity, landscape character and the setting of heritage assets. The aforementioned is also relevant to Strategic Objective 6, which relates to the new settlement at Bowmans Cross. However, locationally specific effects such as these are to be assessed in the appraisal of relevant policies and site allocations. As such, the approach to appraisal taken below is intended to match the high level and aspirational nature of the Strategic Objectives.

**5.11** Strategic Objective 3 states that a minimum of 12,160 homes will be delivered to meet housing need in Hertsmere. This includes a range of sizes, types and tenures and homes for elderly people, people with additional needs and gypsies and travellers. These aspirations are supported by Strategic Objective 4 and Strategic Objective 6, which are focussed on delivering the maximum viable level of affordable housing and the first phases of a new settlement at Bowmans Cross. Significant positive effects are identified for these strategic objectives in relation to SA objective 3 (housing). The scale of housing to be delivered through Strategic Objectives 3 and 6 is likely to be able to have sufficient critical mass to support the delivery of new services and facilities. Additionally, Strategic Objective 1 seeks to ensure that development will be provided in locations that are accessible by sustainable modes of transport, which may improve resident's ability to access key services and facilities. As such, minor positive effects are identified for Strategic Objective 1, 3 and 6 in relation to SA objective 2 (services and facilities). In the case of Strategic Objective 5, a significant positive effects is expected in relation to SA objective 2 (services and facilities) as it states that new homes will be built where there is convenient access to shops and other key services and facilities.

**5.12** Creating inclusive and cohesive communities is explicitly mentioned in Strategic Objective 2 and therefore a significant positive effect is expected in relation to SA objective 4 (community cohesion). Strategic Objective 3 seeks to meet a range of housing needs, which is also likely to contribute to creating strong communities. Therefore, a minor positive effect is identified in relation to SA objective 4. Strategic Objective 5 states that homes should be built where there can be safe and convenient access to schools and health facilities. As such, minor positive effects are identified for this strategic objective in relation to SA objective 1 (education) and SA objective 5 (health). Additionally, Strategic Objective 6 suggests that meeting housing needs will include housing for elderly people and people with additional needs. Therefore, a minor positive effect is identified for Strategic Objective 6 in relation to SA objective 5 (health).

**5.13** Strategic Objective 2 provides some mitigation for potential adverse environmental impacts, by requiring that development is well designed and respects and enhances local character and the local environment. As such, a significant positive effect is identified in relation to SA objective 8 (landscape). The Strategic Objective may also yield benefits for other environmental features and therefore minor positive effects are identified for this strategic objective in relation to SA objective 7 (historic environment), SA objective 10 (biodiversity and geodiversity) and SA objective 11 (water quality). These effects are uncertain as it is not clear specifically which part of the environment the Strategic Objective relates to.

**5.14** Strategic Objective 1 requires development to be located where it can be accessed by sustainable modes of transport. Minor positive effects are therefore identified for Strategic Objective 1 in relation to SA objective 9 greenhouse gas emissions) and SA objective 13 (air quality).

**5.15** Strategic Objective 3 sets out deliver a significant level of housing in the Borough, which is likely to bring new workforce to the area and potentially increases visitors to town centres in the area. As such, a significant positive effect is expected in relation to SA objective 15 (economy).



# DRAFT

## Strategic Objectives 7-11

SA objective	Strategic Objective 7	Strategic Objective 8	Strategic Objective 9	Strategic Objective 10	Strategic Objective 11	Strategic Objective 12
1. Education	+	++	+	0	0	0
2. Services and facilities	0	0	0	0	+	0
3. Housing provision	0	0	0	0	0	0
4. Community cohesion	0	0	+	+	+	0
5. Health	0	0	+	+	0	0
6. Soil and minerals	0	0	0	0	0	0
7. Historic environment	0	0	0	0	0	0
8. Landscape	0	0	+	0	0	0
9. Greenhouse gas emissions	0	0	0	0	0	++
10. Biodiversity and geodiversity	0	0	+	+	0	0
11. Water quality and quantity	0	0	0	0	0	
12. Flooding	0	0		0	0	0
13. Air quality	0	0	+	0	0	0
14. Energy efficiency	0	0	0	0	0	++
15. Economy	++	++	+	0	++	0

**5.16** The scale of employment development that could be enabled by in Strategic Objective 7 will require significant land take, the majority of which is likely to be on greenfield land. This may result in the loss of high quality soils or mineral resources. This may also have adverse impacts on biodiversity, landscape character and the setting of heritage assets. However, locationally specific effects such as these are to be assessed in the appraisal of relevant policies and site allocations. As such, the approach to appraisal taken below is intended to match the high level and aspirational nature of the Strategic Objectives.

**5.17** Strategic Objective 8 sets out to establish strong links between local employers, colleges and schools so that there will be increased choice of employment, training and education opportunities for future residents. As such, a significant positive effect is identified for this strategic objective in relation to SA objective 1 (education) and SA objective 15 (economy). A minor positive effect is identified for Strategic Objective 7 in relation to SA objective 1 (education) as it seeks to ensure that there is an appropriately skilled workforce, which may create training and educational opportunities in the Borough. Significant positive effects are also identified for Strategic Objectives 7 and 11 in relation to SA objective 15 (economy) as they seek to provide sufficient land for businesses and ensure that town centres adapt to economic and legislative change respectively. These Strategic Objectives ensure that Hertsmere's economy is future proofed. A minor positive effect is also expected for Strategic Objective 11 in relation to SA objective 2 (services and facilities) as the commitment to maintaining the vitality of the Borough's town centres is likely to ensure that residents have access to a range of services and facilities.

**5.18** Strategic Objective 9 also contributes positively to educational and economic aspirations in the Borough, by looking to capitalise on the existing film and television industry in the area. The Strategic Objective states that expansion of this industry should deliver social and economic benefits for local communities. As such, a minor positive effect is identified for this strategic objective in relation to SA objective 1 (education), SA objective 4 (community cohesion), SA objective 5 (health) and SA objective 15 (economy). The effects identified in relation to SA objectives 1, 4 and 5 are uncertain due to the wide range of considerations that could come under social benefits.

**5.19** Strategic Objective 10 is likely to be of benefit to community wellbeing by ensuring that people are within close proximity of attractive open spaces that provide opportunities for meeting and leisure. Strategic Objective 11 is similar in this regard, as it seeks to provide town centres that meet the needs of all Hertsmere's communities. As such, minor positive effects are expected for these strategic objectives in relation to SA objective 4 (community cohesion). The potential for open

space enhancements through Strategic Objective 9 may also provide opportunities to deliver biodiversity improvements. Similarly, Strategic Objective 9 suggests that the expansion of the film and television industry in the area should deliver environmental benefits for local communities, which may come in the form of new green infrastructure. As such, minor positive effects are identified for these strategic objectives in relation to SA objective 10 (biodiversity and geodiversity). Environmental benefits for local communities could also entail reductions in air and noise pollution, and public realm improvements. As such, minor positive effects are also identified for Strategic Objective 9 in relation to SA objective 8 (landscape) and SA objective 13 (air quality). These effects are uncertain, as the strategic objective is not explicit in relation to which environmental benefits should be sought.

**5.20** Strategic Objective 12 sets out to promote new development that is energy efficient and achieves net zero standards. This embeds climate change mitigation into the strategic approach for development in the Borough. Therefore, significant positive effects are identified for this strategic objective in relation to SA objective 9 (greenhouse gas emissions) and SA objective 14 (energy efficiency).

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## Strategic Objectives 12-20

SA objective	Strategic Objective 13	Strategic Objective 14	Strategic Objective 15	Strategic Objective 16	Strategic Objective 17	Strategic Objective 18	Strategic Objective 19	Strategic Objective 20
1. Education	0	0	0	0	0	0	0	0
2. Services and facilities	0	0	0	0	0	0	0	0
3. Housing provision	0	0	0	0	0	0	0	0
4. Community cohesion	+	+	0	0	0	0	0	0
5. Health	+	++	+	0	+	0	0	0
6. Soil and minerals	0	0	0	0	0	+	0	0
7. Historic environment	+	0	0	0	0	+	+	++
8. Landscape	+	0	0	0	0	+	+	+
9. Greenhouse gas emissions	+	0	++	++	+	0	0	0
10. Biodiversity and geodiversity	++	0	0	0	0	+	0	0
11. Water quality and quantity	0	0	0	0	0	0	0	0
12. Flooding	0	0	0	0	0	0	0	0
13. Air quality	+	0	++	++	+	0	0	0
14. Energy efficiency	0	0	0	0	0	0	0	0
15. Economy	+	0	0	0	+	0	0	0

**5.21** Strategic Objective 14 states that improvements to physical and mental health of communities in the Borough will be facilitated, which includes reduction in health inequalities. A significant positive effect is therefore identified for this strategic objective in relation to SA objective 5 (health). Minor positive effects are also identified for Strategic Objectives 13, 15 and 17 in relation to this SA objective. In the case Strategic Objective 13, there is a commitment to expansion of the green and blue infrastructure network, which may benefit residents' wellbeing by providing attractive spaces and encouraging outdoor recreation. This is complemented by Strategic Objective 15, which commits to providing active travel links, which may result in residents engaging in more physical activity. In the case of Strategic Objective 17, improved broadband speeds in the Borough may allow less mobile residents to order essential items online more easily or allow them to meet people virtually, which could contribute towards their social and emotional wellbeing. The delivery of green infrastructure and the commitment to reduce health inequalities across the Borough, as set out in Strategic Objective 13 and 15, are also likely to provide meeting places for people and improve relations in the Borough's communities. As such, minor positive effects are identified for these strategic objectives in relation to SA objective 4 (community cohesion).

**5.22** As well as providing increased active travel links, Strategic Objective 15 also seeks to secure provision of public transport links to reduce the need to travel by private car travel. Strategic Objective 16 also makes a strong contribution in this regard, as it makes a commitment to providing infrastructure for electric and other less-polluting forms of private transport. Significant positive effects are therefore expected for these strategic objectives in relation to SA objective 9 (greenhouse gas emissions) and SA objective 13 (air quality). There is potential for an expanded green and blue infrastructure network to contribute to carbon sequestration and managing air pollution in the Borough. As such, minor positive effects are identified for Strategic Objective 13 in relation to SA objectives 9 and 13. As a result of the Covid-19 pandemic, working from home has become more prevalent and has had some benefits in relation to reducing the need for people to commute using private car travel. Strategic Objective 17 supports the improvement and expansion of electronic infrastructure in the Borough, including high speed broadband. This may allow more people to work from home in the Borough and therefore minor positive effects are expected for Strategic Objective 17 in relation to SA objectives 9 and 13.

**5.23** Strategic Objective 13 also seeks to protect and enhance biodiversity in the Borough and therefore a significant positive effect is identified in relation to SA objective 10 (biodiversity and geodiversity). Strategic Objective 18 seeks to protect the

green belt from inappropriate development, which may also protect areas of priority habitat and/or habitat connectivity between designated biodiversity sites. This strategic objective may also prevent loss of high-quality soils, key areas of landscape character and areas that contribute to the setting of heritage assets. As such, minor positive effects are identified for Strategic Objective 18 in relation to SA objective 6 (soils and minerals), SA objective 7 (historic environment) and SA objective 8 (landscape) and SA objective 10 (biodiversity and geodiversity). The expansion of the green and blue infrastructure network, as set out in Strategic Objective 13, has the potential to contribute positively to the attractiveness of the setting of heritage assets and townscapes within the Borough. As a result, minor positive effects are identified for this Strategic Objective in relation SA objectives 7 and 8. At a strategic scale, Strategic Objective 19 plays an important role in protecting landscape character and the setting of heritage assets as it seeks to ensure that any new development reflects the size, pattern and character of the settlement and does not impinge on the distinct and separate identities of towns and villages in the Borough. As such, minor positive effects are identified for this strategic objective in relation to SA objectives 7 and 8. Strategic Objective 20 makes the most significant contribution to SA objective 7, as it seeks to conserve and enhance historic and culturally important heritage, including locally and nationally listed buildings and structures. As a result, the positive effect identified for this strategic objective in relation to SA objective 7 (historic environment) is significant.

**5.24** In terms of the economy, Strategic Objective 17 may improve the attractiveness of the area to businesses due to improved digital infrastructure, including broadband speeds. Therefore, a minor positive effect is identified in relation to SA objective 15 (economy). A minor positive effect is also identified for Strategic Objective 15 as it will provide public transport links, which may improve resident's ability to access employment opportunities.

## Sustainable Growth

### Policy SG1 – Creating Sustainable Development

SA Objective	Policy SG1
1. To improve access to education, training, opportunities for lifelong learning and employability.	+
2. To ensure ready access to essential services and facilities for all residents.	++
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	++
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	+
5. To improve population's health and reduce inequalities.	++
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	++
7. To protect and, where appropriate, enhance heritage assets and their settings.	++
8. To maintain and enhance the quality of countryside and landscape.	+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	++
10. To protect and enhance biodiversity and geodiversity.	++
11. To improve water quality and manage water resources sustainably.	+
12. To minimise the risk of flooding taking account of climate change.	+
13. To improve local air quality.	+
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	++
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	++

**5.25** Policy SG1 (Creating Sustainable Development) sets out a general aspiration for development in the Borough to take place in a sustainable way, supported by social, economic and environmental aspirations, which will enable Hertsmere Borough to be an attractive place to live, work and invest.

**5.26** The policy is expected to have a significant positive effect in relation to SA Objective 3 (Housing Provision) because it states that development proposals should support a range of homes to meet locally identified need including the maximum required level of affordable housing, as well as supported, accessible and other specialist housing. A significant positive effect is also expected in relation to SA Objective 2 (Services) because the policy seeks to improve and/or enhance the provision of local community facilities and services, which is assumed to include primary healthcare facilities and schools, to reflect current and future needs, whilst also minimising and mitigating any impacts on local infrastructure and services. The policy also seeks to support social and cultural well-being through accessible services and open spaces – all of which promote strong, vibrant, safe and inclusive communities which promote healthy living environments and support social and cultural well-being. Additionally, there is a requirement under this policy for development to protect the amenity of occupiers of a site and the wider locality. For these reasons outlined above, a significant positive effect is expected in relation to SA Objective 5 (Health) and minor positive effects are expected in relation to SA Objective 1 (Education) and SA Objective 4 (Community Cohesion).

**5.27** A significant positive effect is expected in relation to SA Objective 14 (Energy Efficiency) because the policy supports development that will increase climate change resilience, energy efficiency and the usage of renewable sources, and minimise emissions, including those associated with water. As such, a minor positive effect is expected in relation to SA Objective 11 (Water Quality and Quantity). Increasing climate change resilience is also expected to help minimise the risk of flooding associated with climate change, with a minor positive effect also recorded in relation to SA Objective 12 (Flooding).

**5.28** Policy SG1 is expected to have significant positive effects against SA Objective 6 (Soil and Minerals) and SA Objective 15 (Economy) because the policy states that the reuse of previously developed land will be prioritised and all new development will be required to prioritise the efficient and effective use of sites. With regard to the economy, in order to help achieve sustainable development, there is a requirement for development proposals to be supported where they attract commercial investment, provide employment opportunities, and facilitate economic growth and changing market behaviours.

**5.29** A significant positive effect is expected in relation to SA Objective 9 (Greenhouse Gas Emissions) because the policy

supports energy efficiency and the use of renewable sources to secure reductions in greenhouse gas emissions. Sustainable modes of travel will be promoted and facilitated under this policy through a safe, efficient and affordable transport system that enables access to everyday facilities, whilst also reducing the need to travel. This is likely to reduce reliance on the private car, which will help minimise greenhouse gas emissions. A reduction in use of the private car will help minimise air pollution and therefore a minor positive effect is expected in relation to SA Objective 13 (Air Quality).

**5.30** Policy SG1 makes reference to the scale, appearance and function of development proposals to the local context and settlement hierarchy, and states that development proposals should take advantage of opportunities to improve the character and quality of an area. For this reason, a minor positive effect is expected in relation SA Objective 8 (Landscape). With respect to the natural and historic environment, the policy requires development proposals to conserve, protect and enhance existing heritage assets, the local character of an area and environmental quality, whilst also providing opportunities for habitat creation, restoration and increased biodiversity. As such, significant positive effects are expected in relation to SA Objective 7 (Historic Environment) and SA Objective 10 (Biodiversity and Geodiversity).



## Policy SG2 – Resilience Against Climate Change

SA Objective	Policy SG2
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	++
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	++
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	++
10. To protect and enhance biodiversity and geodiversity.	++
11. To improve water quality and manage water resources sustainably.	++
12. To minimise the risk of flooding taking account of climate change.	++
13. To improve local air quality.	+
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	++
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.31** Policy SG2 (Resilience Against Climate Change) requires new development to build in resilience against climate change and mitigate against its impacts arising from extreme weather events, such as flooding, drought, heat and cold waves. For this reason, a significant positive effect is expected in relation to SA Objective 12 (Flooding). Mitigating the impacts of extreme weather events is expected to have beneficial effects on people's health and therefore a minor positive effect is expected against SA Objective 5 (Health).

**5.32** According to the policy, all development should identify innovative solutions and incorporate measures to influence behavioural changes and stimulate collective action to mitigate against climate change. Specifically, the policy supports net-zero greenhouse gas emission developments and requires the careful utilisation of resources, which should be responsibly and where possible locally sourced, having low embodied carbon. Therefore, significant positive effects are expected in relation to SA Objective 9 (Greenhouse Gas Emissions) and SA Objective 14 (Energy Efficiency). A minor positive effect is expected in relation to SA Objective 13 (Air Quality) because a reduction in CO<sub>2</sub> emissions will help minimise air pollution, with beneficial effects on people's health.

**5.33** A significant positive effect is expected in relation to SA Objective 6 (Soil and Minerals) because with respect to waste, development proposals must minimise waste while maximising opportunities for recycling and reuse, and implementing principles of the circular economy.

**5.34** A significant positive effect is expected in relation to SA Objective 11 (Water Quality and Quantity) because according to the policy development proposals should reduce water consumption including through greater water re-use and recycling, with residential and commercial development demonstrating the capability to achieve sustainable levels of water consumption over the lifetime of proposals.

**5.35** Policy SG2 states that all development should protect and where appropriate enhance the landscape, open spaces and biodiversity. Significant positive effects are therefore expected in relation to SA Objective 8 (Landscape) and SA Objective 10 (Biodiversity and Geodiversity). Open spaces represent important landscape features and enhancing them will ensure residents have easy access to high quality open spaces, which may encourage more recreational activity. This would contribute towards the minor positive effect already recorded in relation to SA Objective 5 (Health).

## Policy SG3 – Presumption in Favour of Sustainable Development

SA Objective	Policy SG3
1. To improve access to education, training, opportunities for lifelong learning and employability.	+
2. To ensure ready access to essential services and facilities for all residents.	+
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	+
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	+
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	+
7. To protect and, where appropriate, enhance heritage assets and their settings.	+
8. To maintain and enhance the quality of countryside and landscape.	+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	+
10. To protect and enhance biodiversity and geodiversity.	+
11. To improve water quality and manage water resources sustainably.	+
12. To minimise the risk of flooding taking account of climate change.	+
13. To improve local air quality.	+
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	+
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	+

**5.36** Policy SG3 (Presumption in Favour of Sustainable Development) seeks to ensure that sustainable development proposals will be approved and developments that improve the economic, social and environmental conditions of the area are secured. This policy is expected to have minor positive effects in relation to all of the SA objectives. This is because pursuing sustainable development practices will benefit all economic, social and environmental factors within an area.

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## Policy SG4 – Infrastructure Delivery and Monitoring Strategy

SA Objective	Policy SG4
1. To improve access to education, training, opportunities for lifelong learning and employability.	++?
2. To ensure ready access to essential services and facilities for all residents.	++?
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	++?
5. To improve population's health and reduce inequalities.	++?
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	+?
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	-?
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	++?/-?
10. To protect and enhance biodiversity and geodiversity.	++?
11. To improve water quality and manage water resources sustainably.	++?
12. To minimise the risk of flooding taking account of climate change.	++?
13. To improve local air quality.	++?/-?
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	++?
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	++?

**5.37** Policy SG4 (Infrastructure Delivery and Monitoring Strategy) is expected to have significant positive effects against a number of SA objectives because it supports the delivery of infrastructure to support future development within Hertsmere Borough. It is assumed that this includes education facilities, more general services and facilities, community spaces, primary healthcare facilities, waste management, green infrastructure, water management facilities, sustainable drainage systems so as to reduce flood risk, and renewable energy. However, the policy does not specify what infrastructure will be delivered and therefore all effects are recorded as uncertain. Mixed significant positive and minor negative effects are expected in relation to SA Objective 9 (Greenhouse Gas Emissions) and SA Objective 13 (Air Quality) because although it is assumed the Council will promote sustainable travel choices, infrastructure delivery may include improvements and upgrades to the existing strategic road network, which could promote use of the private car and associated greenhouse gas emissions, whilst also contributing towards air pollution. A minor positive but uncertain effect is expected in relation to SA Objective 6 (Soil and Minerals) because waste management infrastructure could be delivered, although this is not specified, which would partially contribute towards the achievement of this objective.

**5.38** A minor negative but uncertain effect is expected in relation to SA Objective 8 (Landscape) because delivery of infrastructure could potentially result in an adverse effect on the landscape, although this is dependent on the final design, scale and layout of the infrastructure delivered.



## Policy SG5 – Infrastructure Provision and Supporting Growth

SA Objective	Policy SG5
1. To improve access to education, training, opportunities for lifelong learning and employability.	++?
2. To ensure ready access to essential services and facilities for all residents.	++?
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	++?
5. To improve population's health and reduce inequalities.	++?
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	-?
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	++?/-?
10. To protect and enhance biodiversity and geodiversity.	++?
11. To improve water quality and manage water resources sustainably.	++?
12. To minimise the risk of flooding taking account of climate change.	++?
13. To improve local air quality.	++?/-?
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	++?
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	++?

**5.39** Policy SG5 (Infrastructure Provision and Supporting Growth) is expected to have significant positive effects against a number of SA objectives because it supports the delivery of infrastructure to support future development within Hertsmere Borough. It is assumed that this includes education facilities, more general services and facilities, community spaces, primary healthcare facilities, waste management, green infrastructure, water management facilities, sustainable drainage systems so as to reduce flood risk, and renewable energy. However, the policy does not specify what infrastructure will be delivered and therefore all effects are recorded as uncertain. Mixed significant positive and minor negative effects are expected in relation to SA Objective 9 (Greenhouse Gas Emissions) and SA Objective 13 (Air Quality) because although it is assumed the Council will promote sustainable travel choices, infrastructure delivery may include improvements and upgrades to the existing strategic road network, which could promote use of the private car and associated greenhouse gas emissions, whilst also contributing towards air pollution.

**5.40** A minor negative but uncertain effect is expected in relation to SA Objective 8 (Landscape) because delivery of infrastructure could potentially result in an adverse effect on the landscape, although this is dependent on the final design, scale and layout of the infrastructure delivered.

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## Policy SG6 – Developer Contributions

SA Objective	Policy SG6
1. To improve access to education, training, opportunities for lifelong learning and employability.	++
2. To ensure ready access to essential services and facilities for all residents.	++
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	++
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	++
5. To improve population's health and reduce inequalities.	++
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	++/-?
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	++/-
10. To protect and enhance biodiversity and geodiversity.	++
11. To improve water quality and manage water resources sustainably.	++
12. To minimise the risk of flooding taking account of climate change.	++
13. To improve local air quality.	++/-
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	++
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	++

**5.41** Policy SG6 (Developer Contributions) is expected to have significant positive effects against a number of SA objectives because it sources the funding of infrastructure to support future development within Hertsmere Borough. This includes affordable housing, facilities for open space and recreation, education and health, nature conservation, landscaping improvements, climate change initiatives, sustainable construction and flood mitigation. The significant positive effect in relation to SA Objective 8 (Landscape) is mixed with a minor negative but uncertain effect because delivery of infrastructure could potentially result in an adverse effect on the landscape, although this is dependent on the final design, scale and layout of the infrastructure delivered.

**5.42** Mixed significant positive and minor negative effects are expected in relation to SA Objective 9 (Greenhouse Gas Emissions) and SA Objective 13 (Air Quality) because although it is assumed the Council will promote sustainable travel choices, infrastructure delivery also includes improvements and upgrades to the existing strategic road network, which could promote use of the private car and associated greenhouse gas emissions, whilst also contributing towards air pollution.

## Policy SG7 – Health and Wellbeing

SA Objective	Policy SG7
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	++
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	+?
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	++
5. To improve population's health and reduce inequalities.	++
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	++
10. To protect and enhance biodiversity and geodiversity.	++/-?
11. To improve water quality and manage water resources sustainably.	++/-?
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	+
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.43** Policy SG7 (Health and Wellbeing) is expected to have a significant positive effect in relation to SA Objective 5 (Health) because it supports development that contributes to the reduction of health inequalities in Hertsmere. The policy expects qualifying development to contribute to health and wellbeing in the district by providing opportunities for sport and recreation, active travel, promoting social interaction through affordable community facilities, social infrastructure, and minimising opportunities for crime. Significant positive effects are therefore expected in relation to SA Objective 2 (Services), SA Objective 4 (Community Cohesion) and SA Objective 9 (Greenhouse Gas Emissions).

**5.44** Mixed significant positive and minor negative effects are expected in relation to SA Objective 10 (Biodiversity and Geodiversity) and SA Objective 11 (Water Quality and Quantity) because the policy would enhance access to good quality green and blue open spaces, with improved biodiversity. However, improved access may increase the recreational pressure on biodiversity and habitats in these areas, although the scale of which is uncertain.

**5.45** A minor positive effect is expected in relation to SA Objective 13 (Air Quality) because improved access to services and facilities as well as good quality green and blue spaces would improve local air quality.

**5.46** A minor positive but uncertain effect is expected in relation to SA Objective 3 (Housing Provision) because although the policy does not suggest thresholds for affordable housing, it emphasises the importance of affordable housing design with sufficient daylight and sunlight levels for future occupants, meeting local housing needs.



## Meeting Local Housing Needs

### Policy H1 – The Supply of New Homes

SA Objective	Policy H1
1. To improve access to education, training, opportunities for lifelong learning and employability.	++?/--?
2. To ensure ready access to essential services and facilities for all residents.	++?/--?
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	++
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	++?/--?
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	+/-
7. To protect and, where appropriate, enhance heritage assets and their settings.	+?/--?
8. To maintain and enhance the quality of countryside and landscape.	+?/--?
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	++?/--
10. To protect and enhance biodiversity and geodiversity.	+?/--?
11. To improve water quality and manage water resources sustainably.	+?/--?
12. To minimise the risk of flooding taking account of climate change.	+?/--?
13. To improve local air quality.	++?/--
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	+?/--?
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	+

**5.47** Policy H1 (The Supply of New Homes) is expected to have a significant positive effect against SA Objective 3 (Housing Provision) because it sets out the number of dwellings that will be delivered over the Plan period, which equates to 12,160 dwellings between 2022 and 2038 (760 dwellings per year). This will meet the objectively assessed need.

**5.48** Mixed significant positive uncertain and significant negative uncertain effects are expected in relation to SA Objective 1 (Education), 2 (Services) and 5 (Health) because this level of housing could place pressure on existing services and facilities (including education, healthcare and recreation facilities) but could also provide funding and the critical mass for provision of new services and facilities. In addition, the policy states that in identifying new locations for housing development, consideration will be given to the existing pattern of development in the area and the defined settlement hierarchy identified in the Plan. Therefore, it is expected that more housing will be delivered in the larger settlements, which generally have better access to services and facilities. Effects are uncertain as they will depend largely on factors such as whether additional services and facilities are provided to accommodate population growth in order to avoid existing services and facilities being over capacity.

**5.49** A mixed minor positive and minor negative effect is expected in relation to SA Objective 6 (Soil and Minerals) because the policy states that in providing new homes, consideration will be given to prioritising development on previously developed land, but due to the amount of development required and constraints of the Borough, some development would also come forward on greenfield land.

**5.50** Mixed minor positive uncertain and significant negative uncertain effects were identified in relation to SA Objectives 7 (Historic Environment), 8 (Landscape), 10 (Biodiversity and Geodiversity), 11 (Water Quality and Quantity) and 12 (Flooding). Due to the constrained nature of the Borough and the scale of development required, development is likely to be in proximity to historic, biodiversity and geodiversity receptors, result in urbanisation of the landscape, place greater demand on water supply and sewage infrastructure, and increase the risk of flooding by introducing more impermeable surfaces to the area. However, the policy states that in providing new homes and identifying new locations for development, consideration should be given to environmental constraints. Although the policy does not specify the environmental constraints it is referring to, hence the uncertainty. In addition, many effects will depend on the final location, layout and design of development. (Note that the assessment of the housing number only in **Chapter 4** does not include the minor positive effect because it is not within the context of Policy H1.)

**5.51** Mixed significant positive uncertain and significant negative effects are expected for SA objectives 9 (Greenhouse gas emissions) and 13 (Air quality) because development will result in an increase of residents within the Borough and an increase in greenhouse gas emissions, particularly due to an increase in private cars on the Borough's roads. In addition, there will be release of greenhouse gas emissions during housing construction and to meet energy demands of residents. However, housing delivery could also result in funding for additional sustainable transport infrastructure and reduce private car usage across the Borough. Although housing may be planned to be located suitably and designed to incorporate sustainable transport and minimise greenhouse gas emissions, this is not known at this stage.

**5.52** Significant negative effects are identified for SA objective 14 (Energy efficiency) because housing construction requires high levels of energy use, and new residents are likely to use substantial amounts of energy at home. The effects of additional housing on energy efficiency will depend on the design and layout of housing, therefore effects are uncertain.

**5.53** Minor positive effects are expected for SA Objective 15 (Economy) because the residents of new housing will provide an increased workforce, supporting the local economy and helping to attract business to the Borough. In addition, the policy states that in identifying new locations for housing development, consideration will be given to the existing pattern of development in the area and the defined settlement hierarchy identified in the Plan. Therefore, it is expected that more housing will be delivered in the larger settlements towards the top of the settlement hierarchy. As such, it is expected that more people will be located within close proximity to the services and facilities present in larger settlements, and their proximity will also increase footfall within the town centres, which will have beneficial effects on the economy.

## Policy H2 – Affordable Housing

SA Objective	Policy H2
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	++
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	+
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	+?

**5.54** Policy H2 (Affordable Housing) is expected to have a significant positive effect against SA Objective 3 (Housing Provision) because it sets a target of delivering at least 4,260 affordable homes over the Plan period. The provision of affordable homes across the Borough is expected to reduce inequalities and help deliver mixed communities. Therefore, minor positive effects are expected in relation to SA Objective 5 (Health) and SA Objective 4 (Community Cohesion).

**5.55** A minor positive but uncertain effect is expected in relation to SA Objective 15 (Economy) because the provision of affordable housing will ensure there is accommodation available for people of working age, bringing more people into the area, although this is uncertain.

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## Policy H3 – Affordable Housing on Rural or First Homes Exception Sites

SA Objective	Policy H3
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	++
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	+
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	+
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	+
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.56** Policy H3 (Affordable Housing on Rural or First Homes Exception Sites) is expected to have a significant positive effect against SA Objective 3 (Housing Provision) because it permits development of small-scale affordable housing schemes in and immediately adjacent to settlements in the Green Belt and designated Rural Area, or outside of the Green Belt and designated Rural Area that would not otherwise be permitted.

**5.57** Minor positive effects are expected against SA Objective 8 (Landscape) and SA Objective 10 (Biodiversity and Geodiversity) because the policy requires the exception sites to be small in scale in relation to the size of settlements to which they relate and not have any adverse effect on the natural environment.

**5.58** Minor positive effects are also expected in relation to SA Objective 5 (Health) and SA Objective 4 (Community Cohesion) because the provision of affordable housing in rural areas will reduce inequalities, whilst also delivering mixed communities.

**5.59** According to the policy, priority will be given to sites located on previously developed land. Therefore, a minor positive effect is expected against SA Objective 6 (Soil and Minerals).

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## Policy H4 – Provision for Gypsies and Travellers

SA Objective	Policy H4
1. To improve access to education, training, opportunities for lifelong learning and employability.	+
2. To ensure ready access to essential services and facilities for all residents.	+
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	++
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	+
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	+
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0



**5.60** Policy H4 (Provision for Gypsies and Travellers) is expected to have a significant positive effect against SA Objective 3 (Housing Provision) because it makes provision for pitches to meet the identified need for Gypsies and Travellers over the Plan period.

**5.61** A minor positive effect is expected against SA Objective 5 (Health) because the policy requires consideration to be given to residential amenity, such as the avoidance of air and noise pollution. Additionally, pitches must be located within close proximity of healthcare facilities. A minor positive effect is also expected against SA Objective 4 (Community Cohesion) because the policy requires the site and future occupants to be integrated into the local area, so as to encourage successful co-existence with other households nearby.

**5.62** Minor positive effects are expected in relation to SA Objective 2 (Services) and SA Objective 1 (Education) because new pitches must be located within reasonable proximity of key local services, including education.

**5.63** A minor positive effect is expected against SA Objective 8 (Landscape) because new pitches must respect the size and scale of, and not dominate, the nearest existing or proposed settled community. There is also a requirement for pitches to be effectively landscaped and to not cause undue harm to the character and appearance of the area.

**5.64** A minor positive effect is expected against SA Objective 11 (Water Quality and Quantity) because sites must be able to receive essential services including water, sewerage, drainage and water disposal.

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## Policy H5 – New and Extended Park Homes Sites

SA Objective	Policy H5
1. To improve access to education, training, opportunities for lifelong learning and employability.	+
2. To ensure ready access to essential services and facilities for all residents.	+
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	++
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	+
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	+
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.65** Policy H5 (New and Extended Park Homes Sites) requires applications for new or extended park home sites to be in accordance with the NPPF and Policy H4 (Provision for Gypsies and Travellers). Therefore, Policy H5 is expected to have the same effects as Policy H4, as outlined above.

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## Policy H6 – Housing Mix

SA Objective	Policy H6
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	++
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	+?

**5.66** Policy H6 (Housing Mix) is expected to have a significant positive effect against SA Objective 3 (Housing Provision) because it ensures that an appropriate mix of housing is provided, in terms of size and type within each tenure.

**5.67** The provision of a mix of housing is expected to attract different groups of people to an area, including those of working age, although this is uncertain. This could help boost the local economy, with a minor positive but uncertain effect expected against SA Objective 15 (Economy).

**5.68** A minor positive effect is also expected against SA Objective 5 (Health) because the policy requires all sites of 25 dwellings or more, to contain a proportion of appropriately located self-contained homes suitable for occupation by wheelchair users. Likewise, all units should be accessible and adaptable, in line with the M4(2) standards. This requirement will ensure equal access for all, reducing inequalities.

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## Policy H7 – Specialist Housing with Support or Care

SA Objective	Policy H7
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	+
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	++
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	+
5. To improve population's health and reduce inequalities.	++
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	+
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	+
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	+

**5.69** Policy H7 (Specialist Housing with Support or Care) is expected to have a significant positive effect against SA Objective 3 (Housing Provision) because it makes provision for specialist housing with support or care for older, disabled and other vulnerable people, to meet locally identified need.

**5.70** A significant positive effect is also expected against SA Objective 5 (Health) because this policy supports older, disabled and more vulnerable people through specialist housing delivery. The policy also requires specialist housing to consider the integration of healthcare facilities within the development, and how these may be made available for use by the wider community.

**5.71** According to Policy H7, all specialist housing should provide a range of accommodation size, tenure and type, as part of a balanced mix of housing development on strategic allocations. Additionally, the housing should be well integrated with existing communities through the sharing of space and public access to services where appropriate. Therefore, a minor positive effect is expected in relation to SA Objective 4 (Community Cohesion).

**5.72** A minor positive effect is expected against SA Objective 2 (Services) because the policy requires specialist housing to be within walking distance or easy reach by passenger transport of a range of shops and other local services. Therefore, people will be able to easily access the services they require, whilst also increasing footfall in areas where amenities are located. This may also help support the local economy, with a minor positive effect expected against SA Objective 15 (Economy).

**5.73** The requirement for specialist housing to be located within walking distance or easy reach by passenger transport of a range of shops and local services is expected to reduce reliance on private vehicles. This would help minimise carbon emissions and air pollution. Therefore, minor positive effects are expected against SA Objective 9 (Greenhouse Gas Emissions) and SA Objective 13 (Air Quality).



## Policy H8 – Redevelopment and Loss of Residential Units

SA Objective	Policy H8
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	+?
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.74** Policy H8 (Redevelopment and Loss of Residential Units) is expected to have a minor positive but uncertain effect against SA Objective 3 (Housing Provision) because it permits the redevelopment of existing residential sites in urban areas for new homes, and states that proposals should retain or increase the number of residential units on the site. If a site were to increase the number of residential units, this would have positive effects in relation to housing delivery. Proposals that would result in a net loss of socially rented properties or a reduction in the overall number of affordable housing units, would not be permitted.

**5.75** A minor positive effect is expected against SA Objective 8 (Landscape) because the policy requires development to be of a scale and design which respects its immediate surroundings, including the local pattern of development, and should improve the quality of the area overall.

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## Policy H9 – Self-Build and Custom-Build Homes

SA Objective	Policy H9
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	+
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.76** Policy H9 (Self-Build and Custom-Build Homes) promotes the development of self-build and custom-build homes, which enable people to design their own home so that it specifically meets their needs, lifestyle and design preferences. The development of self-build and custom build housing will help accommodate the identified housing need. As such, minor positive effects are expected for SA objective 3: housing.

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## Policy H10 – Housing Land

**5.78** Detailed assessments of each site listed have been carried out individually and are found in **Appendix F**. The assessment below considers the implications of the policy as a whole.

SA Objective	Policy H10
1. To improve access to education, training, opportunities for lifelong learning and employability.	++/-
2. To ensure ready access to essential services and facilities for all residents.	++/-
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	++
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	+/-
5. To improve population's health and reduce inequalities.	++/-
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	--/+
7. To protect and, where appropriate, enhance heritage assets and their settings.	--?/+
8. To maintain and enhance the quality of countryside and landscape.	--/+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	++/-
10. To protect and enhance biodiversity and geodiversity.	--?/+
11. To improve water quality and manage water resources sustainably.	-
12. To minimise the risk of flooding taking account of climate change.	-?
13. To improve local air quality.	--/+
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	++

**5.79** Policy H10 (Housing land) allocates sites for residential development in the plan area and sets out the detailed planning requirements with which these sites must comply. The policy provides for the majority of new development at the Tier I, Tier II and Tier III settlements. These settlements all provide access to a reasonable level of services and facilities, including education facilities. A large amount of development (2,400 homes over the plan period) is to be delivered at the Bowmans Cross New Settlement. While this site is not well-related to existing education facilities (the closest located within London Colney around 1.2km to the north west), the development is to incorporate new primary school facilities and new secondary school facilities, if required. Given the new provision expected at Bowmans Cross New Settlement, it is expected to be fairly self-contained and therefore not expected to put pressure on existing services and facilities nearby, such as at London Colney. This is dependent on new services and facilities being provided in a timely manner. Some of the other strategic allocation sites would also incorporate new education facilities which will benefit new residents at these sites as well as existing residents in Hertsmere. However, some of the sites allocated for residential development elsewhere do not provide good access to existing education facilities and their smaller scale would not support new provisions of this nature. This includes some sites at the Aldenham parish villages such as Little Simpsons, Letchmore (HEL509) and Aldenham Glebe (HEL345). A mixed significant positive and minor effect is therefore expected in relation to SA objective 1 (Education).

**5.80** The distribution of growth in the plan resulting from the sites allocated by Policy H10 (Housing land) will also help to ensure a good level of access to other services and facilities, given that much of the housing development would occur at the larger settlements. Some development is directed to the lower tier settlements, including Shenely and South Mimms, which is likely to help sustain local service provision without overburdening it. Access to community services will be strengthened through the requirement for many of the strategic sites to incorporate new services of this type, including at Bowmans Cross New Settlement where new distinct neighbourhood centres and a local centre are to be delivered. Nevertheless, the policy would result in some housing development where services and facilities are less accessible and the scale of development is unlikely to support new services here, including at the Aldenham parish villages. As such, a mixed significant positive and minor effect is expected in relation to SA objective 2 (Services and Facilities).

**5.81** Through Policy H10 (Housing land) sufficient land is allocated to meet the housing requirement over the plan period, when considered alongside existing commitments and anticipated windfall developments. The strategic sites allocated are required to deliver 40% affordable housing and to deliver a mix of dwelling sizes. A small number of strategic

sites are also required to incorporate accommodation for Gypsy and Travellers. The delivery of 535 homes on sites of no more than one hectare (as per the requirements of the NPPF) is likely to support faster built-out rates which will support housing delivery at the start of the plan period. A significant positive effect is expected in relation to SA objective 3 (Housing).

**5.82** The incorporation of new community facilities as required at the strategic sites for development will have benefits for new residents and the existing local population in terms of supporting social integration by providing suitable space for groups to meet and interact. The establishment of the Bowmans Cross New Settlement will require creative solutions relating to the issue of place making. The community infrastructure requirements for the site include new district and local centres as well as public open spaces and the requirement of Policy H10 for necessary infrastructure at proposals to be delivered within agreed timescales is likely to help form a sense of community. This site falls within the 10% most areas of England in terms of barriers to housing and services and development could support improved access to these provisions. Overall, a mixed minor positive and minor negative effect is expected in relation to SA objective 4 (Community Cohesion).

**5.83** The potential to achieve a good level of access to services and facilities for much of the population in Hertsmere is likely to support uptake of active modes of transport, as residents can undertake a higher proportion of journeys by walking and cycling. Furthermore, the spatial distribution of development would locate much of the new development at the higher tier settlements where there is generally better access to healthcare facilities and open space. At the majority of strategic sites, the design of development is required to promote health and well-being and should incorporate public open space. Furthermore, at the Elstree Way Corridor, Borehamwood and Bowmans Cross New Settlement strategic sites new healthcare facilities are to be incorporated or contributions are to be made towards healthcare provision. This requirement will be of particular importance at Bowmans Cross New Settlement, given the high number of new residents to be accommodated at this presently undeveloped location. Regardless of these policy requirements, some locations allocated for development (including the strategic allocation Shenley Grange and some smaller site allocations at the Aldenham parish villages) are less well related to existing and planned for healthcare facilities. Furthermore, there are capacity issues at some of the existing healthcare facilities in the plan area and the Council has advised that only Potters Bar and Bushey Village GPs presently have capacity for new patients, although this may be somewhat mitigated by new healthcare provision required at some sites in this policy. Adverse effects may also result where sites are allocated

adjacent to the strategic road network or railway lines or are close to waste sites, as a result of noise and light pollution as well as odours. This is particularly the case at the Potters Bar Golf Course site, which is bordered by a railway line (the effects of which are required by the policy to be mitigated) as well as being close to a waste site. A mixed significant positive and minor negative effect is expected in relation to SA objective 5 (Health and Wellbeing).

**5.84** The development of the required level of housing will inevitably require development of a substantial amount of greenfield land. Notably this includes a large amount of greenfield land at strategic sites that are extensions to existing settlements and the new settlements at Bowmans Cross. Many of these sites include large areas of Grade 3 agricultural land and Bowmans Cross also includes some Grade 2 agricultural land. Most of these sites also fall within a Minerals Consultation Area for sand and gravel. The allocated sites also include some urban sites (such as Elstree Way Corridor) at which the redevelopment of brownfield land would occur. A mixed minor positive and significant negative effect is expected in relation to SA objective 6 (Soils and Minerals).

**5.85** There are several sites which are allocated to provide new housing over the plan period which lie in close proximity to listed buildings, conservation areas and other heritage assets. This includes at the strategic sites Former Bushey Golf and Country Club (Site BE3, HELAA Ref HEL176) close to Bushey High Street Conservation Area; Potters Bar Golf Course (Site PB2, HELAA Ref HEL251) close to Darkes Lane West Potters Bar Conservation Area; and Bowmans Cross New Settlement (HEL382a and HEL382c) which contains a grade II listed building and is close to several other listed buildings. While the policy identifies that for many of the strategic sites specific mitigation should be incorporated into the design of proposals to limit the potential for adverse effects relating to nearby heritage assets, there is no specific requirement to conserve the heritage assets at Bowmans Cross, although the incorporation the principles of good design may address this to some extent. A mixed minor positive and significant negative effect is expected in relation to SA objective 7 (Historic Environment).

**5.86** The development of a large amount of greenfield land is likely to have substantial impacts on landscape character in the plan area. Much of the Borough has been assessed as having at least moderate sensitivity to low density housing development. Where sites are allocated within these areas and areas of higher sensitivity particularly away from the more developed locations of the Borough there is potential for particularly adverse effects relating to the preservation of established character and landscape setting. The development of Bowmans Cross New Settlement would result in a particularly large amount of development at a location which is currently undeveloped. There is potential for the

development of the site to result in some merging with London Colney within St Albans. The policy requires, however, that at this location and other strategic sites that take in Green Belt land compensatory improvements should be incorporated. This includes the maintenance of visual gaps, key views and green space where appropriate. At Bowmans Cross the development is specifically required to create a new defensible Green Belt boundary which maintains separation between neighbouring settlements. A mixed minor positive and significant negative effect is therefore expected in relation to SA objective 8 (Landscape).

**5.87** The allocation of land for new housing development will result in increased numbers of journeys being made in the plan area as residents access employment and other day to day needs. As discussed in relation to access to services (SA objective 2), much of the new development would take place in close proximity to the larger settlements where existing services, facilities and employment opportunities are located. Many of the sites allocated are close to existing bus stops and new residents at Radlett, Borehamwood and Potters Bar would benefit from relatively good access to existing rail links. Sites allocated in the west of Hertsmere are relatively well located to access railway stations in Watford, including Bushey and Watford Junction. The potential for a high proportion of trips to be made by active and public transport from these sites is likely to help limit carbon emissions. Furthermore, at the strategic sites a range of new services is to be provided which will help instil a degree of self-containment at these locations. At these sites sustainable transport improvements are also required to be provided. This includes at the new settlement (Bowmans Cross) from which a high number of residents might otherwise have an increased need to travel by car given its presently undeveloped nature. The requirement set out in Policy H10 for necessary infrastructure at proposals to be delivered within agreed timescales is likely to help ensure that self-containment at large sites is achieved from an earlier stage of their occupation.

**5.88** The potential to achieve more limited rates of carbon emissions will also be influenced by incorporation of appropriate design measures at new buildings. Bowmans Cross and a number of other strategic sites include requirements to respond to climate change with the aim of moving towards net zero operation. However, some of the sites allocated are less well related to the larger settlements and existing services and facilities and it is expected that the need to travel and associated carbon emissions will be higher at these locations. Furthermore, some of the strategic sites are required to be supported by off-site highways improvements. While highways improvements may help to increase the efficiency of the road network, they may also increase the attractiveness of travel by private vehicle and



therefore limit the potential for modal shift. A mixed significant positive and minor negative effect is expected in relation to SA objective 9 (Greenhouse Gas Emissions).

**5.89** New development will result in habitat loss, fragmentation and disturbance as construction occurs and homes are occupied given the increase in human activity. While brownfield sites can have diversity value, the undeveloped nature of greenfield land may mean there is increased potential for undisturbed assets to be affected at these locations. Much of the new development is to be provided on greenfield sites meaning there is likely to be increased potential for previously undisturbed assets to be affected. Furthermore, a number of the allocated sites are close to locally or nationally designated biodiversity or geodiversity sites meaning there is potential for adverse effects on designated assets. This includes development at Bowmans Cross New Settlement, a large greenfield land site which includes part of Redwell Wood SSSI, as well as areas of Local Wildlife Sites and ancient woodland. Environmental protection measures and ecological enhancements (such as providing wildlife corridors) are required at many of the strategic sites and this may help to minimise and mitigate potential effects relating to biodiversity. At Bowmans Cross, this is to include physical and visual buffers to Local Wildlife Sites, ancient woodland and SSSIs. A mixed minor positive and significant negative effect is expected in relation to SA objective 10 (Biodiversity and Geodiversity). Given that the effects will be dependent upon the specific design of sites allocated, which is currently unknown, the overall effect is uncertain.

**5.90** Many of the sites allocated within the north west and north east of Hertsmere fall within Source Protection Zones (SPZs). Within these areas there is increased potential for groundwater sources to be affected by contamination as a result of construction. The remaining allocated sites are not affected by these designations. While the strategic site allocations are required to be developed to achieve a high quality of development, there is no specific requirement for improved rates of water efficiency to be achieved at new developments. A minor negative effect is expected in relation to SA objective 11 (Water Quality and Quantity).

**5.91** The majority of the allocated sites are located outside of Flood Zones 2 and 3 and are therefore at lower risk of flooding. Strategic site allocation Potters Bar Golf Course contains relatively large areas of flood risk associated with Potters Bar Brook, however, there is a requirement for flood compatible development within these areas which will help minimise adverse effects. There are other smaller areas of flood risk within a number of other strategic sites, however, the requirement for flood compatible development at these locations also applies to these sites. The development of greenfield land in undeveloped locations has the potential to affect the natural drainage patterns in Hertsmere. However,

this may be addressed through the incorporation of SuDS and other flood mitigation measures. Delivering SuDS may also help to ameliorate existing flood risk in the plan area. A minor negative effect is expected in relation to SA objective 12 (Flood Risk). Uncertainty is attached to the effect recorded given that planning requirements are likely to mean that SuDS are delivered which may address flood risk in the plan area.

**5.92** While car technologies have improved in recent years and there is a trend towards less polluting vehicles, vehicular traffic still contributes substantially to air quality issues. The potential to limit air pollution will be influenced by the potential for residents to make use of more sustainable modes of transport (such as walking, cycling, rail and buses). As discussed in relation to access to services (SA objective 2) and greenhouse gas emissions (SA objective 9), much of the allocated development will occur at locations where there is good existing access to services and facilities and sustainable transport links. Furthermore, many of the strategic sites would incorporate infrastructure improvements that could reduce the need to travel as well as to promote sustainable transport measures. The potential to promote modal shift, however, may be limited by the highways improvements supported at a number of strategic sites.

**5.93** There are also a number of Air Quality Management Areas (AQMAS) declared in Hertsmere and within the neighbouring London Boroughs of Enfield, Barnet and Harrow. Sites allocated towards Borehamwood, Potters Bar, Radlett and South Mimms could contribute to increased traffic within the AQMAS in Hertsmere. Furthermore, there are a number of sites to the south east and south west of Hertsmere which may result in increased journeys being made into AQMAS in the Greater London area, resulting in intensification of existing air pollution issues. Many of the strategic site allocations are required to incorporate measures which address the effects of poor air quality, however this would do little to address the potential for increased air pollution to result. The Barnet Lane, Borehamwood site (site BE6, HEL209a) is specifically required to minimise any impact on the nearby AQMA. A mixed minor positive and significant negative effect is expected in relation to SA objective 13 (Air Quality).

**5.94** The allocation of sites for housing development will not affect levels of domestic energy consumption and the potential for renewable energy use. These factors are influenced more by the specific design and construction methods used, whether renewable energy infrastructure is incorporated into development and decisions made by consumers and suppliers in relation to their energy production. A negligible effect is expected in relation to SA objective 14 (Energy Consumption).

**5.95** By allocating many of the housing sites at locations that are well related to larger settlements in the plan area, it is expected that Policy H10 will provide residents with good

access to existing employment opportunities. This is where the majority of the existing employment areas and key employment sites are located. It is also likely that the good level of access to town centre locations will promote high levels of footfall to support the viability of these locations. Many of the strategic site allocations support the creation of new district or local centres (including at the new settlement at Bowmans Cross). These provisions and the delivery of new services and facilities are likely to support some job creation in the plan area, although this will be most influenced by the allocation of additional sites for employment development, which is considered through other policy assessments (most notably Policy E2: Ensuring suitable provision of employment land). Of the strategic housing allocation sites, only Elstree Road and Heathbourne Road, Bushey Heath and South of Potters Bar are required to incorporate new employment space.

**5.96** The provision of new sustainable transport links at strategic sites (particularly at the new settlement) will be of particular importance to ensure local people can access employment opportunities. A significant positive effect is expected in relation to SA objective 15 (Economic Growth).

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## A Strong Local Economy

### Policy E1 – Scale and Distribution of Employment Land

SA Objective	Policy E1
1. To improve access to education, training, opportunities for lifelong learning and employability.	+
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	+
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	+
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	++

**5.97** Policy E1 (Scale and Distribution of Employment Land) is expected to have a significant positive effect against SA Objective 15 (Economy) because it supports proposals for employment development, which will help facilitate a growing economy, in addition to creating economic and employment opportunities.

**5.98** A minor positive effect is expected in relation to SA Objective 1 (Education) because this policy supports development that will provide employment and training opportunities for the local community, which will help in skills development across the Borough.

**5.99** A minor positive effect is expected against SA Objective 6 (Soil and Minerals) because Policy E1 supports the redevelopment and intensification of sites within key, main and locally significant Employment Areas. Therefore, it supports development of previously developed land.

**5.100** A minor positive effect is expected against SA Objective 5 (Health) because applications which involve the demolition and/or construction of new buildings within a designated Employment Area, must give consideration to the immediate and future impact on the existing uses, the character and appearance on the designated Employment Area and amenity, specifically noise, transport, highways, digital communications and power network impact. Additionally, applications must also give consideration to the character and appearance of the designated Employment Area. Therefore, a minor positive effect is also expected in relation to SA Objective 8 (Landscape).

**5.101** A minor positive effect is expected in relation to SA Objective 9 (Greenhouse Gas Emissions) because the policy makes reference to reducing energy use and carbon emission emissions.

## Policy E2 – Ensuring Suitable Provision of Employment

SA Objective	Policy E2
1. To improve access to education, training, opportunities for lifelong learning and employability.	+
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	--/+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	+/-
7. To protect and, where appropriate, enhance heritage assets and their settings.	--?
8. To maintain and enhance the quality of countryside and landscape.	--?/+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	--/+
10. To protect and enhance biodiversity and geodiversity.	-?
11. To improve water quality and manage water resources sustainably.	-?
12. To minimise the risk of flooding taking account of climate change.	-
13. To improve local air quality.	--?
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	++

**5.102** Policy E2 (Ensuring Suitable Provision of Employment Land) is expected to have a significant positive effect in relation to SA Objective 15 (Economy). This is because it allocates six employment sites so as to ensure suitable provision of employment land. All but one of the employment sites are over 0.5ha in size and therefore expected to contribute significantly to employment floorspace and generate a number of new job opportunities. This could improve access to training opportunities and increase levels of employability, with a minor positive but uncertain effect expected in relation to SA Objective 1 (Education). The policy seeks to restrict the loss of Class B floorspace outside of designated Employment Areas. Further to this, the policy states that planning conditions and/or a legal agreement may be applied to manage land use change within Class E within newly created employment land, which is expected to protect employment floorspace. This could also protect the viability of town centres by preventing a change in use of say offices to retail in designated Employment Areas, which would otherwise undermine the role of town centres.

**5.103** Most of the employment sites listed in this policy are expected to have significant negative or minor negative effects in relation to SA Objective 9 (Greenhouse Gas Emissions) because they are not within walking distance of any sustainable transport links or are within walking distance of one sustainable transport link, respectively. This increases reliance on the private car and associated emissions. However, two of the sites are located within close proximity of two sustainable transport links. Further to this, the policy supports flexible workspace in order to reduce the need to travel, which would help minimise greenhouse gas emissions associated with use of the private car. Therefore, a mixed significant negative and minor positive effect is expected overall.

**5.104** A mixed significant negative and minor positive effect is expected in relation to SA Objective 8 (Landscape) because some of the employment sites fall within a landscape character area assessment unit considered to have moderate-high sensitivity. However, one of the sites, Land East of Furzeffield Wood, Potters Bar, comprises brownfield land and would therefore potentially enhance the landscape. The significant negative effect is recorded as uncertain because some of the sites lie within landscape character area assessment units that have not been assessed in relation to their proposed use.

**5.105** All but one of the employment sites are located within close proximity of Hertsmere's strategic road network, which could have an adverse effect on users in terms of pollution and noise disturbance. Therefore, a significant negative effect is expected in relation to SA Objective 5 (Health). However, this is mixed with a minor positive effect because according to Policy E2, proposals for employment development outside of

designated Employment Areas must not have an adverse effect on residential amenity and would therefore help protect people's health and wellbeing. A significant negative effect is expected in relation to SA Objective 13 (Air Quality) because the same sites do not fall within an AQMA but are likely to generate traffic that passes through an AQMA. Therefore, development of these sites could exacerbate existing air quality issues.

**5.106** A significant negative but uncertain effect is expected in relation to SA Objective 7 (Historic Environment) because all of the employment sites are expected to have adverse effects on the historic environment, particularly Bushey Hall Farm, Bushey, because it is located close to a Grade II Listed Building and a Scheduled Monument. Therefore, development of the site is likely to affect the setting of these heritage assets.

**5.107** All of the employment sites are expected to have minor negative effects in relation to SA Objective 10 (Biodiversity and Geodiversity) because they are located on greenfield land and/or within close proximity to designated biodiversity sites. One of the sites, Land East of Furzeffield Wood, Potters Bar, partially contains a Local Wildlife Site. The effect is recorded as uncertain because some of the sites are only located within close proximity of an Ecosite and whilst these are considered to be of value for their semi-natural habitat features or species interest, their wider biodiversity value is uncertain. A minor negative but uncertain effect is also expected against SA Objective 11 (Water Quality and Quantity) because some of the employment sites fall within a Source Protection Zone and development could therefore potentially result in water contamination. One of the employment sites, Land east of Rowley Lane, Borehamwood, falls within Flood Zones 3a or 3b. Its development could therefore increase the risk of flooding, with a minor negative effect expected in relation to SA Objective 12 (Flooding).

**5.108** A mixed minor positive and minor negative effect is expected in relation to SA Objective 6 (Soils and Minerals) because one of the sites, Land East of Furzeffield Wood, Potters Bar, falls entirely on brownfield land and would therefore not affect agricultural quality. All of the remaining sites comprise mainly greenfield land, some of which is classed as grade 3 agricultural land. Land East of Furzeffield Wood, Potters Bar, is also classed as Grade 3 agricultural land. Further to this, all of the sites are located within 250m of a Minerals Consultation Area for sand and gravel.

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## Policy E3 – Land Use within Designated Employment Areas

SA Objective	Policy E3
1. To improve access to education, training, opportunities for lifelong learning and employability.	+
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	+
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	++



**5.109** Policy E3 (Land Use within Designated Employment Areas) is expected to have a significant positive effect in relation to SA Objective 15 (Economy) because it promotes further Class B uses in designated Employment Areas, which is expected to increase the number of employment opportunities available and retain Hertsmere's economic competitiveness.

**5.110** A minor positive effect is expected against SA Objective 1 (Education) because this policy encourages the provision of training opportunities for the local workforce as part of new employment development across Hertsmere Borough. It is expected that this will be achieved through Section 106 agreements and/or planning conditions.

**5.111** A minor positive effect is expected in relation to SA Objective 6 (Soil and Minerals) because this policy promotes high density development at Elstree Way Key Employment Site in Borehamwood and Station Close Employment Area in Potters Bar. Therefore, it is expected that development will make efficient use of previously developed land by building upwards.

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## Policy E4: South Mimms Motorway Services Area – Special Policy Area

SA Objective	Policy E4
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities <sup>12</sup> for all residents.	+
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	-
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	-
7. To protect and, where appropriate, enhance heritage assets <sup>13</sup> and their settings.	-?
8. To maintain and enhance the quality of countryside and landscape.	+/-
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	+/-
10. To protect and enhance biodiversity and geodiversity.	--?
11. To improve water quality and manage water resources sustainably.	-
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	--/+
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	++

<sup>12</sup> Essential services and facilities relevant to this objective include those discussed in the appraisal questions, as well as education and health facilities, which are assessed via SA objective 1 and SA objective 5. This objective relates to overall accessibility to a range of services and facilities, whilst SA Objectives 1 and 5 relate to health and education specifically, and will primarily be assessed through consideration of proximity and provision of facilities.

<sup>13</sup> As per the NPPF (2021) heritage assets are taken to include 'A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.'

**5.112** Policy E4 (South Mimms Motorway Services Area (MSA) - Special Policy Area) allows for development within the MSA which will primarily be for the management, operation and maintenance of the strategic road network. This includes some services for road users, however no new housing or services which support education or training would be provided. Therefore, a negligible effect is expected in relation to SA objectives 1 (Education) and 3 (Housing) and a minor positive effect is expected in relation to SA objective 2 (Services and Facilities). Given the level of limited service provision supported and considering that the services are likely to benefit users of the strategic road network only, the policy is unlikely to support integration in the plan area and a negligible effect is also expected in relation to SA objective 4 (Community Cohesion).

**5.113** The policy allows for additional employment uses at the site that are appropriate in size and scale to the location. Providing new employment development is likely to result in a higher number of employees at the site potentially being subject to road noise and air pollution from the M25 and A1(M) routes. Given that the policy requires that planting is incorporated to screen the site and improve environmental quality, impacts relating to these issues may be partially offset. While there is potential for an adverse effect to result, the mitigation included in the policy means that the negative effect recorded in relation to SA objective 5 (Health and Wellbeing) is minor.

**5.114** While the MSA is presently developed, through Policy E4 (South Mimms Motorway Services Area), development would be supported to the south east and east of the existing developed area. This area is mixed brownfield and greenfield and includes Grade 3 agricultural land. The site also includes part of a Minerals Consultation Area for sand and gravel, meaning there is potential sterilisation of mineral resources to result. A minor negative effect is therefore expected in relation to SA objective 6 (Soils and Minerals).

**5.115** The site does not contain any designated assets but Mimms Wash bridge is located adjacent to it and development could result in change to its setting. Furthermore, there is potential for unknown heritage assets to survive within the site. Therefore, an overall uncertain minor negative effect is likely in relation to SA objective 7 (Historic Environment).

**5.116** The site falls within landscape character area assessment unit 24d (Arkley Plain, Arkley Plain wider landscape), which has moderate-high sensitivity to smaller-scale commercial/industrial use and employment development. The policy is supportive of some development of this type meaning there could be some adverse effects. However, this may be partially offset by the requirement included in the policy for development to incorporate tree planting to screen the site and improve environmental quality.

While there is potential for an adverse effect to result, the mitigation included in the policy means that the negative effect recorded in relation to SA objective 8 (Landscape) is minor.

**5.117** It is accepted that the expansion of the MSA will primarily allow for its continuing proper functioning to provide drivers with space to stop during long journeys thereby supporting road safety in Hertsmere. Furthermore, the policy requires that proposals should not exacerbate existing traffic, meaning any development is not expected to greatly increase the number of car trips to the site. However, the provision of new employment uses and some new services will inevitably result in some level of increased travel to the site by workers and site users, even if this increase is only minimal. Given the strong road connections to the site, many of these trips will be made by car. This could be partially offset by the provision in the policy for development which supports public transport. A mixed minor positive and minor negative effect is expected in relation to SA objective 9 (Greenhouse Gases).

**5.118** The land allocated through Policy E4 (South Mimms Motorway Services Area) contains an Ecosite (Grassland West of Wash Lane) and part of a Wildlife Site (Wash Lane). Development is therefore likely to result in loss, fragmentation and disturbance to habitats which form part of designated biodiversity sites, although the wider biodiversity value of the ecosite is unknown. A significant negative effect is expected in relation to SA objective 10 (Biodiversity and Geodiversity). The precise effects of development at the site will be dependent the design of proposals which come forward. This is currently unknown and therefore the negative effect is uncertain.

**5.119** The existing Motorway Services Area site contains a small part of an SPZ to the north east, meaning there is some potential for new development within the site to result in contamination of groundwater sources. Development at the site is not expected to greatly affect the efficient use of water in Hertsmere. A minor negative effect is therefore recorded in relation to SA objective 11 (Water Quality and Quantity). While there is a small area of Flood Zone 2 and 3 within the south western edge of the site, the policy requires that developments within the flood plain of Mimmshall Brook should not be permitted. A negligible effect is therefore as recorded in relation to SA objective 12 (Flood Risk).

**5.120** As discussed in relation to greenhouse gas emissions (SA objective 9), further development of the site for some new employment uses and services could result in some level of increased travel to the site by workers and site users. It is likely that many of these trips will be made by car given the location of the site on the strategic road network. The site also contains Charleston Paddocks AQMA, which is adjacent to the M25. There are also AQMAs to the east and west located along the M25. The support for public transport related

development in the policy could help to partially offset this effect. A mixed minor positive and significant negative effect is expected in relation to SA objective 13 (Air Quality).

**5.121** Further development at the site will not affect levels of domestic energy consumption and the potential for renewable energy use. These factors are influenced more by the specific design and construction methods used, whether renewable energy infrastructure is incorporated into development and decisions made by consumers and suppliers in relation to their energy production. A negligible effect is therefore recorded in relation to SA objective 14 (Energy Consumption).

**5.122** The policy does not support the delivery of a wide range of new employment uses at the site. However, small scale job creation may result through employment development which is supported and also through new service provision. Therefore, a minor positive effect is expected in relation to SA objective 15 (Economic Growth).

## Policy E5: Elstree Aerodrome - Special Policy Area

SA Objective	Policy E5
1. To improve access to education, training, opportunities for lifelong learning and employability.	+
2. To ensure ready access to essential services and facilities <sup>14</sup> for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	+
7. To protect and, where appropriate, enhance heritage assets <sup>15</sup> and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	+/-
10. To protect and enhance biodiversity and geodiversity.	-?
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	+/-
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	++

<sup>14</sup> Essential services and facilities relevant to this objective include those discussed in the appraisal questions, as well as education and health facilities, which are assessed via SA objective 1 and SA objective 5. This objective relates to overall accessibility to a range of services and facilities, whilst SA Objectives 1 and 5 relate to health and education specifically, and will primarily be assessed through consideration of proximity and provision of facilities.

<sup>15</sup> As per the NPPF (2021) heritage assets are taken to include 'A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.'

**5.123** Policy E5 (Elstree Aerodrome - Special Policy Area) allows for development within the Elstree Aerodrome which is to be limited to operational activities and aviation related businesses. This includes support for development relating to aviation and avionics. Particular support is given to development which would allow for employment and training schemes. Development for new housing and services, however, is not supported. Therefore, while a minor positive effect is expected in relation to SA objective 1 (Education), a negligible effect is expected in relation to SA objectives 2 (Services and Facilities), 3 (Housing) and 4 (Community Cohesion).

**5.124** The policy prohibits development at the aerodrome that would have a significant adverse effect on designated open space, sports and leisure facilities. A minor positive effect is therefore expected in relation to SA objective 5 (Health).

**5.125** The site lies on Grade 3 agricultural land but it is not within a Minerals Consultation Area. Parts of the site have already been developed to support its current use as an Aerodrome, although there are substantial areas of grass within its boundaries, particularly around the runway. Given that development would be related to the continued use of the site as an airfield it is not expected that the areas of grass would be subject to much or any development. A minor positive effect is expected in relation to SA objective 6 (Soils and Minerals).

**5.126** The aerodrome site does not contain any known designated or non-designated heritage assets. As it has been subject to modern development as an aerodrome, its further development is unlikely to result in significant setting change for the designated assets nearby, and there is low potential for unknown heritage assets within the site. A negligible effect is expected in relation to SA objective 7 (Historic Environment).

**5.127** While the aerodrome site falls within an area of moderate to high sensitivity to small scale commercial use much of its area has already been developed. Given that the site consists of brownfield land, a minor positive effect is expected in relation to SA objective 8 (Landscape).

**5.128** The maintenance of and support for local employment opportunities may help to reduce the need for residents to travel longer distances for work. The policy also supports development that reduces emissions and mitigates against climate change. However, the policy supports continued flying operations, which are carbon intensive. A mixed minor positive and minor negative effect is therefore expected in relation to SA objective 9 (Greenhouse Gas Emissions).

**5.129** The aerodrome site is adjacent to a Local Nature Reserve (Hilfield Park Reservoir) and is located almost entirely within an Ecosite (Elstree Aerodrome). As such allowing for additional development within the site could result

in disturbance to habitats which form part of these local designations. However, the policy requires that proposals which would result in significant adverse impact on wildlife sites and the ecological network will not be permitted. Overall, given the presence of the site adjacent to a Local Nature Reserve and mostly within an Ecosite some less than significant adverse effects are still expected in relation to biodiversity. Therefore, a minor negative effect is recorded in relation to SA objective 10 (Biodiversity and Geodiversity). The effect is uncertain given that impacts relating to biodiversity will be influenced greatly by specific mitigation incorporated as part of any development's design which is currently unknown, and the wider value of the Ecosite is unknown.

**5.130** Support through the policy for aviation related businesses may increase the number of flights to and from the aerodrome. While commercial flights are unlikely to operate from the site, any increase in flights is likely to have adverse effects related to air pollution. However, the policy is also supportive of proposals that improve air quality. Therefore, a mixed minor positive and minor negative effect is expected in relation to SA objective 13 (Air Quality).

**5.131** The aerodrome site is an important resource for local businesses in the Hertsmere area, enabling them to take advantage of its air connections to the rest of the UK and to Europe. The policy will help to ensure the safe and efficient operating of the aerodrome and is supportive of development that allows for employment and training schemes to maximise local employment opportunities. A significant positive effect is expected in relation to SA objective 15 (Economic Growth).

**5.132** The site does not fall within an SPZ or an area of higher flood risk. Therefore, a negligible effect is expected in relation to SA objectives 11 (Water Quantity and Quality) and 12 (Flood Risk). A negligible effect is also expected in relation to SA objective 14 (Energy Consumption).

## Policy E6: Media Quarter Borehamwood - Special Policy Area

SA Objective	Policy E6
1. To improve access to education, training, opportunities for lifelong learning and employability.	++
2. To ensure ready access to essential services and facilities <sup>16</sup> for all residents.	+
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	+
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	+/-
7. To protect and, where appropriate, enhance heritage assets <sup>17</sup> and their settings.	-?
8. To maintain and enhance the quality of countryside and landscape.	+/-
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	++/-
10. To protect and enhance biodiversity and geodiversity.	+/-?
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	+/-
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	++?
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	++

<sup>16</sup> Essential services and facilities relevant to this objective include those discussed in the appraisal questions, as well as education and health facilities, which are assessed via SA objective 1 and SA objective 5. This objective relates to overall accessibility to a range of services and facilities, whilst SA Objectives 1 and 5 relate to health and education specifically, and will primarily be assessed through consideration of proximity and provision of facilities.

<sup>17</sup> As per the NPPF (2021) heritage assets are taken to include 'A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.'



**5.133** Policy E6 (Media Quarter Borehamwood - Special Policy Area) addresses the development of a new film studio complex and associated infrastructure. The policy refers to four parts of the area, Sites A, B, C and D, of which Site A has planning consent.

**5.134** The development of Sites B and C is to be supported by an Employment and Skills Plan, with a new college to be delivered on Site C. A significant positive effect is expected in relation to SA objective 1 (Education). Site C is also to incorporate designed civic or open space and must ensure integration with the town and wider area through enhanced accessibility measures, which will support residents ability to make use of the new college and open space to be delivered. A minor positive effect is expected in relation to SA objective 2 (Services and Facilities). No new homes would be delivered at any of the sites in question, however, the delivery of new open space at Site C which would be accessible by sustainable modes of transport and the delivery of offsite improvements to Borehamwood Town Centre are likely to support social integration in the wider area. A negligible effect is therefore expected in relation to 3 (Housing) and a minor positive effect is expected in relation to SA objective 4 (Community Cohesion). The requirement for new open space to be provided alongside enhancement of pedestrian and cycle links is also likely to benefit public health in the area. A minor positive effect is therefore also recorded in relation to SA objective 5 (Health).

**5.135** Development would lead to the loss of Grade 3 agricultural land, although there are also areas of brownfield land within the southern area of this site. The whole area falls within a Minerals Consultation Area for sand and gravel. A mixed minor positive and minor negative effect is therefore expected in relation to SA objective 6 (Soils and Minerals).

**5.136** There are two grade II listed buildings to the north of Site C and development could have an adverse change on their setting, as well as that of a non-designated asset nearby. The development of the site is to be informed by the preparation of a comprehensive whole site masterplan, to be accompanied by area character assessments and design codes. However, there is no specific requirement for potential impacts on the historic environment to be mitigated. A minor negative effect is therefore expected in relation to SA objective 7 (Historic Environment).

**5.137** This land falls within character areas 21a: Borehamwood Fringe, 21d: High Canons Valleys and Ridges wider landscape and 24a: Arkley Plain, Borehamwood Fringe. These areas are considered to have 'moderate-high' to 'low-moderate' sensitivity to residential flats/small scale commercial uses. The development of a relatively large area of land directly at the eastern edge of Borehamwood could have adverse effects for the local landscape setting. However,

where brownfield land is developed there may be opportunities to improve the local townscape. The requirement in the policy for the site to be developed in line with character area assessments and design codes and to create a defensible Green Belt boundary, including additional planting and landscaping, is likely to benefit the local landscape setting. Given the mitigation contained in the policy and the potential for the redevelopment of brownfield land to achieve improvements to local character, an overall mixed minor positive and minor negative effect is expected in relation to SA objective 8 (Landscape).

**5.138** The delivery of development to support new business in the film and TV sector will inevitably result in increased travel to Hertsmere for employment in this relatively niche industry. The proximity of the site to the strategic road network may result in a proportion of journeys being made by car. However, the settlement of Borehamwood contains a railway station and the sites are in close proximity to existing bus stops along Rowley Lane. Furthermore, the sites are to be developed to ensure some level of self-containment, given that a new hotel will be delivered to serve film and TV employees thereby helping to reduce the need for day to day long-distance commuting. Furthermore, while highways improvements are required to support the development of the sites (including access for HGVS and LGVs) a travel plan should support the development in promoting modal shift. The development is also required to respond positively to climate change through a bespoke Climate Change and Energy Strategy which maximises opportunities to secure carbon-neutral development and create carbon positive land use. A mixed significant positive and minor negative effect is recorded in relation to SA objective 9 (Greenhouse Gas Emissions).

**5.139** The development of the land within the Special Policy Area could result in loss and fragmentation of and disturbance to a number of habitats associated with Ecosites Rowley Farm Pond, Rowley Lane Grasslands, Rowley Lane Pastures and Saffron Green Pasture as well as Local Wildlife Site, Regents Shooting Ground, Rowley Green. While Rowley Lane Pastures ecosite and part of Rowley Farm Pond ecosite lie within Site C, the remaining local biodiversity sites lie adjacent to or in close proximity to the areas for development. The policy requires that Sites B, C and D maximise opportunities for biodiversity net gains, including additional planting. Therefore, while the development of the sites could adversely affect the integrity of the identified biodiversity sites, there is also potential for improvements in terms of ecological connectivity in the wider area. A mixed minor positive and minor negative effect is expected in relation to SA objective 10 (Biodiversity and Geodiversity). The overall effect is uncertain given that impacts relating to biodiversity will be influenced by specific mitigation incorporated as part of any development's design, which is currently unknown.

**5.140** The sites do not fall within an SPZ and development at this location is not expected to affect water quality or the rate of per person water consumption in Hertsmere. A negligible effect is therefore expected in relation to SA objective 11 (Water Quantity and Quality). Small areas of Flood Zone 2 and 3 (less than 25%) fall within Sites A (which already has planning consent), B and D. The policy requires that Sites B, C and D are developed to improve the existing drainage and provide adequate space for surface water runoff, flood risk attenuation measures, including SUDS. A negligible effect is therefore expected in relation to SA objective 12 (Flood Risk).

**5.141** While the sites are to be delivered to help ensure a degree of self-containment and sustainable modes of transport improvements will be incorporated, the increased travel to and from the site for work is likely to result in additional air pollution in the area. The Barnet AQMA is located directly to the south of Site D, including land at the junction of the A1 and Rowley Lane. There is potential for existing air quality issues within the AQMA to be exacerbated as workers make use of the strategic road network to access the site. A mixed minor positive and significant negative effect is therefore expected in relation to SA objective 13 (Air Quality). Given that development of Sites B and C is required to maximise opportunities to secure carbon-neutral development, it is expected that more energy efficient buildings will be delivered. A significant positive uncertain effect is therefore expected in relation to SA objective 14 (Energy Consumption).

**5.142** The primary purpose of the policy is to support the growth of a cluster of land uses that support growth in the film and TV production industry. This growth will support job creation in the local area and boost the economy of Hertsmere. Additional job opportunities will be created through the provision of an additional hotel on Site C as well the delivery across Sites B, C and D, of employment space ancillary or complimentary to the film and TV sector. The policy also requires that suitable opportunities are created through the development of Sites B and C for training/apprenticeships. A significant positive effect is expected in relation to SA objective 15 (Economic Growth).

# DRAFT

## Policy E7 – A Flexible Local Economy

SA Objective	Policy E7
1. To improve access to education, training, opportunities for lifelong learning and employability.	+
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	+
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	+
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	++

**5.143** Policy E7 (A Flexible Local Economy) is expected to have a significant positive effect against SA Objective 15 (Economy) because it facilitates greater home and site-based working, which will be very important following the COVID-19 pandemic, in addition to encouraging employment development that accommodates the needs of small and medium sized enterprises and local businesses. The policy requires major offices/ and or research development facilities over 2,000m<sup>2</sup> to provide affordable floorspace to SME businesses, whilst those over 5,000m<sup>2</sup> must also make at least 25% of floorspace available through smaller industrial units below 250m<sup>2</sup>, 10% of which must be affordable.

**5.144** Minor positive effects are also expected in relation to SA Objective 9 (Greenhouse Gas Emissions) and SA Objective 13 (Air Quality) because this policy seeks to facilitate greater home working through the provision of required infrastructure and workspace. Therefore, people will not be required to travel to their workspace, which may normally be via private car. Reducing dependence on the private car will help minimise associated greenhouse gas emissions, in addition to air pollution.

**5.145** A minor positive effect is expected against SA Objective 1 (Education) because this policy requires major employment developments to identify opportunities for local employment skills and training opportunities.

# DRAFT

## Policy E8 – Promoting the Film and Television Industry

SA Objective	Policy E8
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	+?
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0?
11. To improve water quality and manage water resources sustainably.	0?
12. To minimise the risk of flooding taking account of climate change.	0?
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	++

**5.146** Policy E8 (Promoting the Film and Television Industry) is expected to have a significant positive effect against SA Objective 15 (Economy) because it seeks to promote the film and television industry, which Hertsmere Borough is known for. It seeks to achieve this by supporting applications directly connected with film production or associated creative industries.

**5.147** A minor positive but uncertain effect is expected in relation to SA Objective 7 (Historic Environment) because according to the policy, the Council will work with relevant parties to identify a suitable site and mechanism for the delivery of a film and television heritage centre in Borehamwood, which will promote access, as well as the enjoyment and understanding of, Hertsmere's Borough's film and television heritage.

**5.148** Negligible but uncertain effects are expected against SA Objective 10 (Biodiversity and Geodiversity), SA Objective 11 (Water Quality and Quantity) and SA Objective 12 (Flooding) because the policy states that proposals will be supported outside of the existing studio sites, subject to environmental constraints. The policy does not provide detail on environmental constraints but it could encompass biodiversity, water resources management and quality, in addition to flood risk, or the siting of a site away from these constraints.

## Policy E9 – Securing Mixed-Use Development

SA Objective	Policy E9
1. To improve access to education, training, opportunities for lifelong learning and employability.	+?
2. To ensure ready access to essential services and facilities for all residents.	+
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	+
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	+
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	+/-
10. To protect and enhance biodiversity and geodiversity.	+?
11. To improve water quality and manage water resources sustainably.	+?
12. To minimise the risk of flooding taking account of climate change.	+?
13. To improve local air quality.	+/-
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	++



**5.149** Policy E9 (Securing Mixed-Use Development) is expected to have a significant positive effect against SA Objective 15 (Economy) because it promotes mixed-use development on major development sites in Borehamwood and Potters Bar town centres. The mix of uses will ensure a balanced economy, whilst also bringing more people into the town centres and increasing footfall.

**5.150** The policy is expected to have a minor positive effect against SA Objective 3 (Housing Provision) because it promotes residential development as part of mixed-use development. A minor positive effect is also expected in relation to SA Objective 2 (Services) because promoting mixed-use development ensures that residents are located within close proximity of a range of services and facilities. This may include educational facilities, although this is uncertain. The policy also requires consideration to be given to the need for additional services and facilities in an area. Therefore, a minor positive but uncertain effect is expected against SA Objective 1 (Education).

**5.151** A minor positive effect is expected against SA Objective 4 (Community Cohesion) because the policy requires active frontages at ground floor level, which will increase 'eyes on the street' and reduce/prevent crime.

**5.152** A minor positive effect is expected against SA Objective 5 (Health) because mixed-use development proposals, which co-locate light industrial, storage or distribution floorspace with residential and/or other sensitive uses, must demonstrate that any adverse effects on amenity will be mitigated. This will have a beneficial effect on people's wellbeing. In addition, the policy is expected to ensure residents have access to sufficient health and recreation facilities.

**5.153** Minor positive effects are expected against SA Objective 10 (Biodiversity and Geodiversity), SA Objective 11 (Water Quality and Quantity) and SA Objective 12 (Flooding) because the Council will assess the impact any mixed-use application will have on the environment. The policy does not provide any further detail on this but this could include biodiversity, water resources and flooding, although this is uncertain. Therefore, the effects are recorded as uncertain.

**5.154** Mixed minor positive and minor negative effects are expected in relation to SA Objective 9 (Greenhouse Gas Emissions) and SA Objective 13 (Air Quality) because the policy states that the Council will also assess applications based on their accessibility to public transport and local and strategic road network capacity. Although consideration is given to public transport, so is highway capacity and use of the private car. Use of the private car increases greenhouse gas emissions, whilst also reducing air quality. Public transport, on the other hand, can help minimise greenhouse gas emissions, in addition to air pollution.

## Policy E10 – Providing Local Employment Skills and Opportunities

SA Objective	Policy E10
1. To improve access to education, training, opportunities for lifelong learning and employability.	++
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	+
5. To improve population's health and reduce inequalities.	++
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	++

**5.155** Policy E10 (Providing Local Employment Skills and Opportunities) is expected to have a significant positive effect against SA Objective 1 (Education) and SA Objective 15 (Economy) because it encourages the implementation of employment and training schemes by requiring all employment and business proposals resulting in development over 1,000 sqm of floorspace to produce an Employment and Skills Plan, which sets out the ways in which they will contribute towards the provision of local employment skills and opportunities. This will help in skills development across the Borough, whilst also generating a number of job opportunities. Indeed, there is a requirement for 25% of all jobs created by development to be specifically targeted at local residents.

**5.156** A significant positive effect is expected against SA Objective 5 (Health) because this policy seeks to increase the proportion of under-represented groups within the construction industry workforce, whilst also supporting those sections of Hertsmere's workforce that are further from employment, having been out of work for a long period of time and/or having low levels of skills. This is expected to help reduce inequalities across the Borough, providing more equal employment opportunities.

**5.157** A minor positive effect is expected in relation to SA Objective 4 (Community Cohesion) because targeting employment and training schemes to those who would not normally have these opportunities, may help improve community cohesion.

## Green Belt

### Policy GB1 – The Green Belt

SA Objective	Policy GB1
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	+/-
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	+?
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.158** Policy GB1 (The Green Belt) is expected to have a minor positive effect against SA Objective 8 (Landscape) because it will likely protect the existing form and pattern of settlements in the Borough by restricting urban sprawl and safeguards the countryside from encroachment. In doing so, the policy may encourage the re-use and redevelopment of brownfield sites in the Borough, therefore, a minor positive uncertain effect against SA Objective 6 (Soil and Minerals) is expected.

**5.159** The policy allows for infill development within villages washed over by the Green Belt which is expected to contribute to the objectively assessed housing need for the District, specifically the housing need in more rural areas. Therefore, a minor positive effect is expected against SA Objective 3 (Housing Provision). However, this is mixed with a minor negative effect because the policy against inappropriate development in the Green Belt would restrict the potential supply of sites for housing.

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## Policy GB2 – Compensatory Green Belt Improvements

SA Objective	Policy GB2
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	++?
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	-?
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	++?
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	+++?
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	+++?
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.160** Policy GB2 (Compensatory Green Belt Improvements) is expected to have a significant positive effect against SA Objective 8 (Landscape) and SA Objective 10 (Biodiversity and Geodiversity) because it will enhance the environmental quality of the countryside. New development in sites removed from Green Belt could promote high quality green infrastructure and provide additional landscape and visual enhancements within or adjacent to the development site. It could also provide increased opportunities to incorporate biodiversity offsetting within compensatory improvements. However, the effect is recorded as uncertain because the policy does not specify the extent or type of environmental improvements made to specific areas of Green Belt land.

**5.161** A minor positive but uncertain effect is expected in relation to SA Objective 2 (Services) because of the type of potential improvements made to the environmental quality and accessibility of remaining Green Belt land. The effect is uncertain because the policy does not specify the extent or type of environmental improvements made to specific areas of Green Belt land. However, the policy could provide opportunities to enhance open spaces within Green Belt land for the benefit of the population such as publicly available pitches or allotments. This would create opportunities for the local population to lead healthier lifestyles. Therefore, a minor positive but uncertain effect is expected against SA Objective 5 (Health).

**5.162** The policy states that planning permission will not be granted for development in sites removed from the Green Belt unless compensatory improvements can be provided through a legal agreement. This may potentially reduce the viability of some housing developments within these sites. Therefore, a minor negative effect but uncertain is expected against SA Objective 3 (Housing Provision).



# DRAFT

## Policy GB3 – Key Green Belt Sites

SA Objective	Policy GB3
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	-?
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	+/-
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	+
7. To protect and, where appropriate, enhance heritage assets and their settings.	+
8. To maintain and enhance the quality of countryside and landscape.	+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	-?
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.163** Policy GB3 (Key Green Belt Sites) is expected to have a minor positive effect against SA Objective 8 (Landscape) because it will likely protect the existing form and pattern of settlements by directing development towards the envelope defined on the Policies Map. In doing so, the policy ensures more opportunities for the re-use and redevelopment of brownfield sites in the Borough, therefore a minor positive effect against SA Objective 6 (Soil and Minerals).

**5.164** 1.2 A minor positive effect is expected against SA Objective 7 (Historic Environment) because development within Key Green Belt Sites are required to conserve or enhance relevant heritage assets.

**5.165** A minor negative but uncertain effect is expected against SA Objective 2 (Services) and SA Objective 10 (Biodiversity and Geodiversity) because the policy makes reference to no significant impacts on designated open space as well as wildlife sites and habitats within a wider ecological network. Therefore, there is a possibility that minor adverse impacts could occur from infill or redevelopment within Key Green Belt Sites. The effect is recorded as uncertain because the severity of potential adverse impacts will depend on the exact location and nature of development.

# DRAFT

## Policy GB4 – Development Standards in the Green Belt

SA Objective	Policy GB4
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	+
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	-?
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	++
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	++
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.166** Policy GB4 (Development Standards in the Green Belt) is expected to have a significant positive effect against SA Objective 8 (Landscape) because it ensures that the visual impact of development is minimised through the seasons and avoids isolated countryside development. It also outlines that existing landscape and ecological interest within development proposals should be retained and enhanced, including as part of any Biodiversity Net Gain. Therefore, a significant positive effect is expected against SA Objective 10 (Biodiversity and Geodiversity).

**5.167** The policy outlines that residential schemes on previously developed land should not cause substantial harm to Green Belt openness. However, requiring the affordable element of any proposals on previously developed sites in the Green Belt to be comprised wholly of rented accommodation could potentially restrict the variety of affordable housing in more rural areas. Development must also not have a greater impact than the existing development on the openness of the Green Belt which could potentially reduce the viability of some housing developments within these sites. Therefore, a minor negative but uncertain effect is expected against SA Objective 3 (Housing Provision).

**5.168** A minor positive effect is expected against SA Objective 2 (Services) because it ensures development retains existing open and green space in the area.

## Responding to Climate Change

### Policy CC1 – Climate Change Mitigation

SA Objective	Policy CC1
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	++
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	++
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	+
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	++
10. To protect and enhance biodiversity and geodiversity.	+
11. To improve water quality and manage water resources sustainably.	++
12. To minimise the risk of flooding taking account of climate change.	++
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	++
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.169** Policy CC1 (Climate Change Mitigation) is expected to have significant positive effects against SA Objective 14 (Energy Efficiency) and SA Objective 9 (Greenhouse Gas Emissions) because applications should be supported by a site-specific Climate Change and Energy Statement that demonstrates how development will reduce energy demand and improve energy efficiency. Minimising the need to travel and improving the provision of walking and cycling networks, in addition to public transport, will minimise the number of car journeys throughout the Borough and contribute to reduced greenhouse gas emissions. Development will create sustainable communities and reduce private car dependency through design by optimising density and enhancing local services such as retail and healthcare. Therefore, significant positive effects are expected against SA Objective 2 (Services) and SA Objective 5 (Health).

**5.170** The policy outlines how water consumption will be reduced through careful scheme design and a maximum potable water usage of 110 litres per person per day. This will contribute towards mitigating against flooding as an impact of climate change whilst also improving the sustainability and management of water resources in the Borough. Therefore, significant positive effects are expected against SA Objective 11 (Water Quality and Quantity) and SA Objective 12 (Flooding).

**5.171** Minor positive effects are expected against SA Objective 8 (Landscape) and SA Objective 10 (Biodiversity and Geodiversity) because development will incorporate landscape and ecological features into its design, including the use of effective green infrastructure as a suitable mechanism for the delivery of climate change resilience. This will mean that effective landscaping is incorporated into the design of development throughout the Borough and links to biodiversity corridors will enhance the connectivity of sites of high habitat value.

**5.172** A minor positive effect is expected against SA Objective 6 (Soil and Minerals) because development will be required to make efficient and effective use of land in the Borough. In turn, this will minimise the amount of greenfield or high quality agricultural land that would be used by development.

## Policy CC2 – Greenhouse Gas Reductions

SA Objective	Policy CC2
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	-?
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	++
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	++
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0



**5.173** Policy CC2 (Greenhouse Gas Reductions) is expected to have significant positive effects against SA Objective 14 (Energy Efficiency) and SA Objective 9 (Greenhouse Gas Emissions) because it will ensure development that meets the carbon scheme threshold will be required to achieve on-site net zero greenhouse gas emissions. Applications above the carbon scheme threshold are required to minimise greenhouse gas emissions through the preparation of a Climate Change and Energy Strategy, together with a Whole Life Carbon Assessment, whilst developments below the carbon scheme threshold should seek net zero carbon.

**5.174** A minor negative effect is expected against SA Objective 3 (Housing Provision) because it may reduce the viability of some new housing developments that will be required to make contributions to the proposed carbon offset fund. The effect is recorded as uncertain because this is dependent on the nature and design of development.

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## Policy CC3 – Energy Generation

SA Objective	Policy CC3
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	++
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.175** Policy CC3 (Energy Generation) is expected to have a significant positive effect against SA Objective 14 (Energy Efficiency) because it will increase the supply of on-site or stand-alone sustainable or renewable energy facilities, energy storage, heat recovery systems, or decentralised energy networks.

**5.176** A minor positive effect is expected against SA Objective 5 (Health) because development for sustainable energy types outlined in the policy should result in no net adverse impacts on local amenity. Furthermore, making energy more affordable may help tackle inequalities and health issues in relation to fuel poverty.

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## Policy CC4 – Natural Cooling

SA Objective	Policy CC5
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	++
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	++
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	++
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.177** Policy CC4 (Natural Cooling) is expected to have significant positive effects against SA Objective 10 (Biodiversity and Geodiversity) and SA Objective 8 (Landscape) because all relevant developments will have green infrastructure components incorporated into their design. This will enhance the biodiversity and landscape value of sites on and adjacent to development whilst having a primary benefit of reducing the likelihood of heat island effects. In turn, this will also lead to opportunities for the local population to lead healthier lifestyles by having access to publicly accessible green infrastructure assets and green and blue infrastructure can also positively impact mental health. Therefore, a minor positive effect is expected against SA Objective 5 (Health).

**5.178** The policy outlines that heat generation will be minimised through effective design, which will in turn improve energy efficiency in development relevant to this policy. Therefore, a significant positive effect is also expected against SA Objective 14 (Energy Efficiency).

**5.179** A minor positive effect is expected against SA Objective 15 (Economy) because incorporating green infrastructure into proposals may improve the quality of employment sites in the Borough and local cooling and attractive areas may help employees feel more comfortable, leading to greater productivity. It could also attract inward investment and workers to these areas.

## Design for Life

### Policy DL1 – Making Effective Use of Land

SA Objective	Policy DL1
1. To improve access to education, training, opportunities for lifelong learning and employability.	+?
2. To ensure ready access to essential services and facilities for all residents.	++
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	++
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	+
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	+?
12. To minimise the risk of flooding taking account of climate change.	+?
13. To improve local air quality.	+
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	+

**5.180** Policy DL1 (Making Effective Use of Land) defines different Density Zones across the Borough and the number of dwellings expected per hectare in these zones. Seeing as higher density development is encouraged in Town and District Centres and other locations in Density Zone 1, a significant positive effect is expected against SA Objective 2 (Services), whilst a minor positive effect is expected against SA Objective 15 (Economy). This is because a higher number of people will be located within close proximity to Town and District Centres and similar locations, where a range of services and facilities are located. They will utilise these amenities, bringing money into the local economy. A minor positive effect is also expected against SA Objective 1 (Education) for the reasons outlined above. However, the effect is recorded as uncertain because although it is likely more people will have easy access to education facilities by foot and public transport in Town and District Centres and Accessibility Zone 1, this depends on the exact location of development.

**5.181** A significant positive effect is expected against SA Objective 6 (Soils and Minerals) because this policy supports higher density development in Town and District Centres and other locations in Density Zone 1. This is likely to reduce the need to develop land elsewhere, particularly greenfield land that comprises some of the best and most versatile agricultural land.

**5.182** People will not be required to travel longer distances to reach amenities elsewhere, which will reduce reliance on the private car and minimise associated air pollution. It is also likely reducing reliance on the private car will minimise greenhouse gas emissions. Therefore, minor positive effects are also expected against SA Objective 9 (Greenhouse Gas Emissions) and SA Objective 13 (Air Quality).

**5.183** Planning permission for residential and mixed-use development proposals will be granted, provided they do not compromise internal and external design features, local character of an area, amenity, local infrastructure requirements and environmental considerations. Therefore, a minor positive effect is expected against SA Objective 8 (Landscape) because protecting the character of an area will prevent development having adverse effects on the landscape and/or townscape. A minor positive effect is also expected against SA Objective 5 (Health) because protecting amenity will have a beneficial effect of people's wellbeing.

# DRAFT

## Policy DL2 – High Quality, Safe and Accessible Development

SA Objective	Policy DL2
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	+
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	++/-
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	++
5. To improve population's health and reduce inequalities.	++
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	+
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	++
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	++
10. To protect and enhance biodiversity and geodiversity.	+
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	+
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	++
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0



**5.184** Policy DL2 (High Quality, Safe and Accessible Development) promotes high quality development and contains a list of design standards that all development proposals, including advertisements, should meet. Development proposals are required by this policy to incorporate the principles of crime prevention and community safety, including counter-terrorism protective security for publicly accessible buildings and spaces, in accordance with the Hertsmere Planning and Design Guide. The policy states that opportunities to maximise natural surveillance and create active frontages should be integrated into new layouts to ensure public spaces and pedestrian routes are safe to use. Additionally, proposals that create new public space or relate to the existing public realm should have regard to the latest government guidance for safer public spaces. Further to this, the policy states that any residential schemes should be tenure blind where market and affordable homes are delivered on site, which could have beneficial effects on community cohesion. Therefore, overall, a significant positive effect is expected against SA Objective 4 (Community Cohesion).

**5.185** A significant positive effect is expected against SA Objective 14 (Energy Efficiency) because the policy requires the integration of low carbon principles into development, whilst also ensuring that opportunities for natural ventilation of new buildings are maximised. More specifically, all residential development should meet the highest standards of the BRE Home Quality Mark (or other equivalent measure), including any new Future Homes Standards. With regard to non-residential development, the BREEAM 'Excellent' standard or equivalent should be achieved. For these reasons, a significant positive effect is also expected against SA Objective 9 (Greenhouse Gas Emissions) because the design principles set out above will also help minimise CO<sub>2</sub> emissions.

**5.186** The policy states that new residential development should meet or exceed the internal space standards set by government. Therefore, a significant positive effect is expected against SA Objective 3 (Housing Provision). However, this is mixed with a minor negative effect because the design standards set out in this policy may potentially reduce the viability of some new housing developments.

**5.187** A significant positive effect is expected in relation to SA Objective 8 (Landscape) because the policy requires all development to reflect local distinctiveness and the principles set out in the National Design Guide and National Model Design Guide, the Hertsmere Planning and Design Guide (or successor document) and where applicable, Neighbourhood Plans and site-specific design codes. As mentioned above, the layout of a site, including any public realm areas, should provide good physical and visual connectivity with existing street patterns. With regard to advertisements, these should

integrate well with their surroundings and respect the character of an area.

**5.188** As set out in Policy DL2, all development should prioritise active travel modes and walkable neighbourhoods through layout and design. Indeed, the layout of a site must be legible, permeable and accessible, and provide good physical and visual connectivity with existing street patterns. This will encourage walking and cycling, with beneficial effects on people's physical and mental health. Additionally, avoiding development that may have an adverse effect on residential amenity will also have beneficial effects on wellbeing. According to the policy, building safety should also be considered, including specific Planning Gateway requirements for higher-risk buildings. Therefore, a significant positive effect is expected against SA Objective 5 (Health). Encouraging more active modes of travel and walkable neighbourhoods will also reduce dependence on the private car and minimise associated air pollution. Therefore, a minor positive effect is expected against SA Objective 13 (Air Quality). A reduced reliance on the private car will also contribute to the positive effect already recorded against SA Objective 9 (Greenhouse Gas Emissions).

**5.189** A minor positive effect is expected in relation to SA Objective 2 (Services) because this policy seeks to deliver development that is fully accessible to all, including those with limited mobility. Therefore, services and facilities that people may not otherwise have access to would be accessible under this policy. A minor positive effect is also expected in relation to SA Objective 6 (Soil and Minerals) because the policy seeks to avoid creating 'left-over' spaces which have no clear function, which is an efficient use of land. The policy supports the incorporation of street trees and takes opportunities to incorporate trees elsewhere, which will help with habitat creation and protecting existing biodiversity. Therefore, a minor positive effect is also expected against SA Objective 10 (Biodiversity and Geodiversity).

# DRAFT

## Policy DL3 – Design Standards for Flats, Maisonettes and Houses in Multiple Occupation

SA Objective	Policy DL3
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	+
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	+
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	+?

**5.190** Policy DL3 (Design Standards for Flats, Maisonettes and Houses in Multiple Occupation) requires a good standard of accommodation that meets or exceeds internal space standards, whilst also providing communal or private outdoor amenity space. The policy requires new homes to be double-aspect and to avoid north facing single aspect layouts so as to help monitor temperatures and ventilation in new homes, with beneficial effects on people's health. Double-aspect layouts can also reduce the need for heating and air conditioning, helping minimise emissions associated with the operation of building. Therefore, minor positive effects are expected against SA Objective 3 (Housing Provision), SA Objective 5 (Health) and SA Objective 9 (Greenhouse Gas Emissions).

**5.191** The design standards set out in this policy are likely to make an area more attractive to young professionals who may be looking for a flat or other smaller property, most likely to rent, near their place of work. As such, this policy has the potential to bring more people into an area, with beneficial effects on the economy, although this is uncertain. Therefore, a minor positive but uncertain effect is expected against SA Objective 15 (Economy).

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# DRAFT

## Policy DL4 – Health Impact Assessment

SA Objective	Policy DL4
16. To improve access to education, training, opportunities for lifelong learning and employability.	0
17. To ensure ready access to essential services and facilities for all residents.	++?
18. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
19. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	++?
20. To improve population's health and reduce inequalities.	++
21. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
22. To protect and, where appropriate, enhance heritage assets and their settings.	0
23. To maintain and enhance the quality of countryside and landscape.	0
24. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	++?
25. To protect and enhance biodiversity and geodiversity.	++?/-?
26. To improve water quality and manage water resources sustainably.	++?/-?
27. To minimise the risk of flooding taking account of climate change.	0
28. To improve local air quality.	+?
29. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
30. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.192** Policy DL4 (Health Impact Assessments) is expected to have a significant positive effect in relation to SA Objective 5 (Health) because it requires developers to enhance the physical and mental health of local communities. By requiring developers to identify health impacts, developers may provide opportunities for sport and recreation, active travel, promote social interaction through affordable community facilities, social infrastructure, and minimise opportunities for crime, although the measures to mitigate health impacts are not specified. Significant positive but uncertain effects are therefore expected in relation to SA Objective 2 (Services), SA Objective 4 (Community Cohesion) and SA Objective 9 (Greenhouse Gas Emissions).

**5.193** Mixed significant positive and minor negative effects are expected in relation to SA Objective 10 (Biodiversity and Geodiversity) and SA Objective 11 (Water Quality and Quantity) because developers may enhance access to good quality green and blue open spaces as a result of identifying health impacts of their development. However, improved access may increase the recreational pressure on biodiversity and habitats in these areas, although the scale of which is uncertain.

**5.194** A minor positive but uncertain effect is expected in relation to SA Objective 13 (Air Quality) because improved access to services and facilities as well as good quality green and blue spaces would improve local air quality.

## Policy DL5 – Waste Arisings

SA Objective	Policy DL5
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	++
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	+
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.195** Policy DL5 (Waste Arisings) is expected to have a significant positive effect against SA Objective 6 (Soil and Minerals) because it facilitates the reduction and recycling of household and business waste through communal and underground recycling and collection schemes, whilst also ensuring full provision for the storage of waste.

**5.196** The policy requires justification to be provided for buildings that are proposed to be demolished through a Climate Change and Energy Strategy that sets out how all materials arising from demolition and remediation works will be reduced and/or recycled, which will help minimise emissions associated with the construction and demolition of buildings. Therefore, a minor positive effect is expected in relation to SA Objective 9 (Greenhouse Gas Emissions).

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## Local Heritage

### Policy HE1 – Heritage Assets and their Setting

SA Objective	Policy HE1
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	++?
8. To maintain and enhance the quality of countryside and landscape.	+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0



**5.197** Policy HE1 (Heritage Assets and their Setting) is expected to have a significant positive but uncertain effect in relation to SA Objective 7 (Historic Environment) because it encourages the conservation and enhancement of the historic environment. According to the policy, proposals will be assessed with regard to Historic England's latest guidance. Uncertainty is added against this effect because the policy would not prevent some level of harm to the historic environment in certain circumstances.

**5.198** The measures outlined in Policy HE1 are expected to indirectly protect the landscape and/or townscape, which may be characterised by historic features. Therefore, a minor positive effect is expected in relation to SA Objective 8 (Landscape).

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## Policy HE2 – Listed Buildings and their Setting

SA Objective	Policy HE2
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	-?
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	++
8. To maintain and enhance the quality of countryside and landscape.	+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	-?

**5.199** Policy HE2 (Listed Buildings and their Setting) prevents development proposals (including alterations or extensions to buildings) from materially harming listed buildings and their settings. Therefore, a significant positive effect is expected against SA Objective 7 (Historic Environment).

**5.200** The measures outlined in Policy HE2, such as protecting the setting of listed buildings, are expected to indirectly protect the landscape and/or townscape, which may be characterised by historic features. Therefore, a minor positive effect is expected in relation to SA Objective 8 (Landscape).

**5.201** This policy could restrict development of, or within the setting of listed buildings, although this is uncertain. Therefore, a minor negative but uncertain effect is expected against SA Objective 3 (Housing Provision) and SA Objective 15 (Economy).

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## Policy HE3 – Conservation Areas and their Setting

SA Objective	Policy HE3
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	++
8. To maintain and enhance the quality of countryside and landscape.	++
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.202** Policy HE3 (Conservation Areas and their Setting) is expected to have a significant positive effect in relation to SA Objective 7 (Historic Environment) because development (including alterations or extensions to buildings) will only be permitted if it protects or enhances the special interest, character or appearance of a Conservation Area. Proposals involving the demolition of buildings or structures in Conservation Areas will only be permitted if the criteria set out in Policy HE3 are met.

**5.203** A significant positive effect is also expected against SA Objective 8 (Landscape) because the policy requires development to be of a scale, proportion, form, height, design and overall character that accords with and complements the surrounding area, whilst also respecting established building lines, layouts and important views. Development is also expected to make use of materials that reinforce local character.

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## Policy HE4 – Archaeology

SA Objective	Policy HE4
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	++?
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.204** Policy HE4 (Archaeology) is expected to have a significant positive but uncertain effect against SA Objective 7 (Historic Environment) because where a site includes or has the potential to include heritage assets with archaeological interest, a desk-based assessment must be undertaken, in addition to a field evaluation where necessary. Planning permission will only be granted where it can be demonstrated that harm will be minimised and development will achieve substantial public benefits. The effect is recorded as uncertain because this policy could potentially allow some harm to archaeology in certain circumstances.

**5.205** Planning permission relating to sites of archaeological interest will be subject to conditions and/or legal agreements, which require appropriate excavation and recording in advance of development, in addition to the subsequent storage and display of material.

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## Protecting and Enhancing the Natural Environment

### Policy ENV1 – Environmental Impact of Development

SA Objective	Policy ENV1
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	+?
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	+?
11. To improve water quality and manage water resources sustainably.	+
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	+
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0



**5.206** Policy ENV1 (Environmental Impact of Development) is expected to have a minor positive effect against SA Objective 5 (Health) because the overall health and safety of the local population will be protected from impacts arising from development with regards to pollution, contamination, noise and vibration, water quality, light and odour.

**5.207** A minor positive effect is expected against SA Objective 13 (Air Quality) because the policy seeks to avoid exacerbating poor air quality within AQMAs. The policy states that new development should not lead to an increase in designated AQMAs or an increased frequency of failure against the National air quality objective outside existing AQMAs.

**5.208** A minor positive effect is expected against SA Objective 11 (Water Quality and Quantity) because the policy would preserve the existing quality of aquifers and the water table in the Borough from any harm arising from development.

**5.209** A minor positive but uncertain effect is expected against SA Objective 6 (Soil and Minerals) because development could result in the remediation of contaminated land. However, this effect is recorded as uncertain because it will be dependent on the potential constraints of the site.

**5.210** A minor positive but uncertain effect is expected against SA Objective 10 (Biodiversity and Geodiversity) because development will be expected to minimise its impact on the environment which could potentially positively benefit wildlife throughout the Borough.

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## Policy ENV2 – Hazardous Substances

SA Objective	Policy ENV2
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	+
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	+?
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.211** Policy ENV2 (Hazardous Substances) is expected to have a minor positive effect against SA Objective 6 (Soil and Minerals) because it outlines considerations for development that may involve hazardous substances, or development in the vicinity of hazardous materials storage. The policy also ensures that no long term land contamination will arise as a result of development. This could also ensure that groundwater and surface water bodies are protected from hazardous substances, although this is dependent on the type of development proposed. Therefore, a minor positive but uncertain effect is expected against SA Objective 11 (Water Quality and Quantity).

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## Policy ENV3 – Biodiversity Strategy

SA Objective	Policy ENV3
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	-?
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	++
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.212** Policy ENV3 (Biodiversity Strategy) is expected to have a significant positive effect against SA Objective 10 (Biodiversity and Geodiversity) because it outlines that development should mitigate for and provide net gains in biodiversity in line with the proposed hierarchies. Furthermore, designated sites will be conserved and new networks of biodiversity interest are promoted as part of the policy. It should be noted that the provision for environmental net gain is already outlined in the NPPF (2021) and the Environment Bill is set to require at least 10% biodiversity net gain for most development.

**5.213** A minor negative but uncertain effect is expected against policy SA Objective 3 (Housing Provision) because planning obligations that secure appropriate management schemes to deliver biodiversity net gain may reduce the viability of some new housing developments. The effect is recorded as uncertain because this is dependent on the type and scale of housing proposals at each site.

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## Policy ENV4 – Sites of Biodiversity Value

SA Objective	Policy ENV4
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	++?
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.214** Policy ENV4 (Sites of Biodiversity Value) is expected to have a significant positive but uncertain effect because it outlines that all development proposals should identify opportunities to enhance nearby sites of biodiversity value. However, the effect is recorded as uncertain because there is the potential for development to result in adverse effects to existing nationally, regionally or locally designated sites if there is no alternative to the development. Although compensation measures to offset any harm will result in no net adverse effects from any development, existing habitats within designated sites could still be harmed. The potential harm to existing sites of biodiversity value is dependent on the location, type and scale of the potential development.

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## Policy ENV5 – Landscape Character

SA Objective	Policy ENV5
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	+
8. To maintain and enhance the quality of countryside and landscape.	++
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	++
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0



**5.215** Policy ENV5 (Landscape Character) is expected to have a significant positive effect against SA Objective 8 (Landscape) because it states that all development will be managed to conserve and/or enhance the landscape character across the Borough. The policy will ensure that development will conserve or improve the existing quality, character and condition of the landscape and its features as described in the Hertfordshire Landscape Character Assessment and Hertsmere Landscape Sensitive and Visual Impact Assessment.

**5.216** The policy outlines that the location and design of development will provide opportunities to enhance existing habitats and native species to the Borough should be used in landscaping schemes. Therefore, a significant positive effect is expected against SA Objective 10 (Biodiversity and Geodiversity).

**5.217** A minor positive effect is expected against SA Objective 7 (Historic Environment) because the policy will ensure that the location and design of development and its landscaping will respect local features of the Borough which could include its historic character and setting.

## Policy ENV6 – Development on Agricultural Land

SA Objective	Policy ENV6
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	+
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.218** Policy ENV6 (Development on Agricultural Land) is expected to have a minor positive effect against SA Objective 6 (Soil and Minerals) because the best and most versatile agricultural land will be protected from development in line with existing guidance from Natural England.

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## Policy ENV7 – Trees, Landscape and Development

SA Objective	Policy ENV7
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	++
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	+
5. To improve population's health and reduce inequalities.	++
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	++
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	+
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.219** Policy ENV7 (Trees, Landscape and Development) is expected to have a significant positive effect against SA Objective 8 (Landscape) because it will identify opportunities to create new areas of landscape interest and at least two new trees will be planted for each home included within new developments. This will provide improvements to the landscape and townscape throughout the Borough in relation to trees and planting.

**5.220** A significant positive effect is expected against SA Objective 2 (Services) and SA Objective 5 (Health) because the policy outlines that the Council will seek the provision of additional urban gardening projects and allotments through strategic development. This will create opportunities for the local population to lead healthier lifestyles. The policy will also provide the Borough with additional community outdoor space. Therefore, a minor positive effect is expected against SA Objective 4 (Community Cohesion).

**5.221** A minor positive effect is expected against SA Objective 10 (Biodiversity and Geodiversity) because high-quality trees and hedgerows will be preserved, which can provide valuable habitat.

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## Policy ENV8 – Green and Blue Infrastructure

SA Objective	Policy ENV8
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	++
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	-?
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	++
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	++
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	++
10. To protect and enhance biodiversity and geodiversity.	++
11. To improve water quality and manage water resources sustainably.	+
12. To minimise the risk of flooding taking account of climate change.	+
13. To improve local air quality.	++
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	+

**5.222** Significant positive effects are expected against SA Objective 2 (Services), SA Objective 4 (Community Cohesion) because the provision of new green infrastructure assets may enhance connections between new and existing developments. Green infrastructure networks will be well-designed and enhance public rights of way by providing connections and extensions where opportunities exist. This policy will also lead to opportunities for the local population to lead healthier lifestyles by having access to publicly accessible green infrastructure assets and green and blue infrastructure can also positively impact mental health. Therefore, a minor positive effect is expected against SA Objective 5 (Health).

**5.223** Policy ENV8 (Green and Blue Infrastructure) is expected to have significant positive effects against SA Objective 8 (Landscape) and SA Objective 10 (Biodiversity and Geodiversity) because opportunities will be sought by developments to enhance the network for its landscape and biodiversity value. Development proposals will also maximise opportunities for urban greening through landscaping and the planting of street trees. Street trees can help absorb carbon dioxide, which in turn contribute towards reducing greenhouse gas emissions throughout the Borough. In appropriate locations, street trees can also help manage air quality. Therefore, a significant positive effect is also expected against SA Objective 9 (Greenhouse Gas Emissions) and a minor positive effect is expected against SA Objective 13 (Air Quality). The minor positive effect is recorded as uncertain because improvements in air quality is dependent on the location of street trees in relation to development.

**5.224** A minor positive effect is expected against SA Objective 11 (Water Quality and Quantity) because the policy will maximise opportunities from potential development to restore channelised or culverted watercourses. This will ensure the quality of surface water will be protected and contribute towards reducing the rate of run-off from surface water flooding. Therefore, a minor positive effect is also expected against SA Objective 12 (Flooding).

**5.225** A minor negative but uncertain effect is expected against policy SA Objective 3 (Housing Provision) because site-specific planning obligations will be sought where appropriate for the management of green infrastructure projects which may reduce the viability of some new housing developments. The effect is recorded as uncertain because this is dependent on the type and scale of housing proposals at each site.

**5.226** A minor positive effect is expected against SA Objective 15 (Economy) because green infrastructure may improve the quality of employment sites in the Borough. It will also attract inward investment and workers to these areas.

## Policy ENV9 – Groundwater Source Protection Zones

SA Objective	Policy ENV9
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	+
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0



**5.227** Policy ENV9 (Groundwater Source Protection Zones) is expected to have a minor positive effect against SA Objective 11 (Water Quality and Quantity) because it will ensure that development does not lead to the deterioration of groundwater quality in accordance with Environment Agency guidance.

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## Policy ENV10 – Flood Risk and Drainage

SA Objective	Policy ENV10
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	+?
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	+?
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	+?
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	++
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.228** Policy ENV10 (Flood Risk and Drainage) is expected to have a significant positive effect against SA Objective 12 (Flooding) because opportunities will be sought to reduce the existing flood risk on and within the vicinity of development sites. Development will also take account of climate change through appropriate modelling and will apply the sequential test then an exception test to minimise flood risk throughout the Borough.

**5.229** Minor positive but uncertain effects are expected against SA Objective 10 (Biodiversity and Geodiversity), SA Objective 8 (Landscape) and SA Objective 2 (Services) because the policy states that any flood protection or mitigation measure should not result in undue impacts on nature conservation, landscape character or recreational facilities.

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## Policy ENV11 – Sustainable Drainage Systems, Grey Water Recycling and Water Management

SA Objective	Policy ENV11
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	+
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	++
11. To improve water quality and manage water resources sustainably.	++
12. To minimise the risk of flooding taking account of climate change.	++
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.230** Policy ENV11 (Sustainable Drainage Systems, Grey Water Recycling and Water Management) is expected to have significant positive effects against SA Objective 11 (Water Quality and Quantity) and SA Objective 12 (Flooding) because developments of 10 (gross) residential units or 1,000m<sup>2</sup> of floorspace in the Borough should incorporate sustainable drainage systems (SuDS) into their design. SuDS will seek to achieve the greenfield runoff rate to help minimise the risk of flooding within new development in the Borough, whilst the provision of grey water recycling will help to increase efficient use of water.

**5.231** The policy also makes provision for the management and inclusion of SuDS to improve biodiversity and amenity. Multi-functional solutions such as wetland areas will be prioritised which provide biodiversity benefits. Temporary flood storage areas will also provide amenity open spaces, although these will be inaccessible when in use for flood storage. Therefore, a significant positive but uncertain effect is expected against SA Objective 10 (Biodiversity and Geodiversity) and a minor positive but uncertain effect is expected against SA Objective 2 (Services). The effect is recorded as uncertain because the impacts are dependent on the design of the proposed SUDS.

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## Policy ENV12 – Watercourses and Infrastructure

SA Objective	Policy ENV12
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	++
11. To improve water quality and manage water resources sustainably.	++
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.232** Policy ENV12 (Watercourses and Infrastructure) is expected to have significant positive effects against SA Objective 10 (Biodiversity and Geodiversity) and SA Objective 11 (Water Quality and Quantity) because the natural environment of watercourses and their surrounding areas will be conserved or improved by development. Opportunities to renew existing assets to watercourses will be sought and an assessment against the Water Framework Directive will be applied to any development which could have a direct impact on a river. Furthermore, the policy will provide opportunities to support river restoration and enhancement as a result of development which will subsequently improve habitat value in these areas.

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## Policy ENV13 – Mineral Consultation Area

SA Objective	Policy ENV13
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	++
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0



**5.233** Policy ENV13 (Mineral Consultation Area) is expected to result in a significant positive effect against SA Objective 6 (Soil and Minerals) because it seeks to protect the existing resources of minerals in identified areas across the Borough.

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## Local Facilities

### Policy LF1 – Protecting Key Community Facilities

SA Objective	Policy LF1
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	++
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	++
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.234** Policy LF1 (Protecting Key Community Facilities) is expected to have a significant positive effect against SA Objective 4 (Community Cohesion) because it prevents the loss of community facilities to other forms of development unless the criteria in the policy can be met. This will ensure that well-used community facilities are retained and if they are not in use, they will be replaced by development that there is demand for. Therefore, a significant positive effect is also expected against SA Objective 2 (Services).

**5.235** A minor positive effect is expected in relation to SA Objective 5 (Health) because the policy requires any replacement provision to be suitable for and accessible to all, which will help reduce any inequality in access to community facilities.

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## Policy LF2 – New or Enhanced Social and Community Facilities

SA Objective	Policy LF2
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	++
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	++
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	+
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	+
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.236** Policy LF2 (New or Enhanced Social and Community Facilities) promotes the development or enhancement of social and community facilities. Therefore, a significant positive effect is expected in relation to SA Objective 2 (Services) and SA Objective 4 (Community Cohesion).

**5.237** According to the policy, development will be permitted provided it is inclusive in design and addresses the local community and/or an identified wider, strategic need (including any unmet need which cannot be accommodated elsewhere). For this reason, a minor positive effect is expected against SA Objective 5 (Health).

**5.238** A minor positive effect is also expected against SA Objective 9 (Greenhouse Gas Emissions) and SA Objective 13 (Air Quality) because development for social and community facilities will only be permitted if it is, or can be made, accessible by public transport, walking and cycling. This is expected to reduce reliance on the private car, which will minimise greenhouse gas emissions, in addition to minimising air pollution.

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# DRAFT

## Policy LF3 – Protecting Open Space, Sport and Recreation Facilities

SA Objective	Policy LF3
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	++
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	+
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	+
10. To protect and enhance biodiversity and geodiversity.	+
11. To improve water quality and manage water resources sustainably.	+
12. To minimise the risk of flooding taking account of climate change.	+
13. To improve local air quality.	+
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.239** Policy LF3 (Protecting Open Space, Sport and Recreation Facilities) is expected to have a significant positive effect against SA Objective 2 (Services) and a minor positive effect against SA Objective 4 (Community Cohesion) because it prevents open space, sport and recreation facilities from being lost to development, unless the set of circumstances listed in the policy can be met.

**5.240** The policy requires new development, including strategic allocations, to improve the provision of open space, sport and recreational facilities. As such, people living at these strategic allocations will be within closer proximity to open spaces and recreation facilities, which will reduce their need to travel elsewhere to find these amenities. This would reduce reliance on the private car and minimise associated air pollution, whilst also minimising greenhouse gas emissions. Therefore, minor positive effects are expected against SA Objective 9 (Greenhouse Gas Emissions) and SA Objective 13 (Air Quality).

**5.241** A minor positive effect is expected against SA Objective 5 (Health) because the policy seeks to prevent recreation facilities, which includes leisure provision, from being lost. Retaining leisure provision is expected to have beneficial effects on people's health and wellbeing. Additionally, ensuring provision of open space and recreation facilities at strategic allocations may encourage more people to walk, cycle and exercise, because they will be located within close proximity to these amenities.

**5.242** A minor positive effect is expected against SA Objective 8 (Landscape) because the policy states that any development on a designated open space or facility should not cause significant harm to the character, appearance and visual amenity of the local area.

**5.243** A minor positive effect is expected against SA Objective 10 (Biodiversity and Geodiversity) because it is likely the provision of open space will help develop the green infrastructure network across the Borough, improving levels of biodiversity. The provision of green infrastructure will also help mitigate against climate change by managing surface water and sewer flooding by reducing runoff and providing water storage and retention areas. Therefore, minor positive effects are also expected against SA Objective 11 (Water Quality and Quantity) and SA Objective 12 (Flooding).

# DRAFT

## Policy LF4 – Open Space and Recreation Facilities Standards for New Development

SA Objective	Policy LF4
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	++
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	+
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	+
10. To protect and enhance biodiversity and geodiversity.	++
11. To improve water quality and manage water resources sustainably.	+
12. To minimise the risk of flooding taking account of climate change.	+
13. To improve local air quality.	+
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0



**5.244** Policy LF4 (Open Space and Recreation Facilities Standards for New Development) is expected to have a significant positive effect against SA Objective 2 (Services) and a minor positive effect against SA Objective 4 (Community Cohesion) because it refers to the minimum quantity standards for open space and recreation provision. Therefore, the policy ensures that residents have access to open space and recreation facilities. According to the policy, new development in localities with known deficiencies of open space and/or areas of deprivation, new development should seek to meet or exceed the provision standards on-site or nearby. This is expected to increase use of open space and recreation facilities, and people will also be able to walk to these amenities due to their proximity. This is likely to reduce reliance on the private car, which will minimise greenhouse gas emissions and air pollution, whilst also having beneficial effects on people's health. Therefore, minor positive effects are expected against SA Objective 9 (Greenhouse Gas Emissions), SA Objective 13 (Air Quality) and SA Objective 5 (Health).

**5.245** A significant positive effect is expected in relation to SA Objective 10 (Biodiversity and Geodiversity) because the provision of open space is likely to increase areas of green space and associated biodiversity. Furthermore, the policy states that opportunities to incorporate green infrastructure, including linear spaces and biodiversity networks, should be delivered as part of any new open space provision. Green infrastructure will help mitigate against climate change by managing surface water and sewer flooding by reducing runoff and providing water storage and retention areas. Therefore, minor positive effects are also expected against SA Objective 11 (Water Quality and Quantity) and SA Objective 12 (Flooding).

**5.246** A minor positive effect is expected against SA Objective 8 (Landscape) because providing areas of open space may help enhance the local landscape/townscape. There is also a requirement in the policy for private amenity space and landscaping.

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## Policy LF5 – Community Access to Recreation and Leisure Facilities

SA Objective	Policy LF5
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	++
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	+
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.247** Policy LF5 (Community Access to Recreation and Leisure Facilities) is expected to have a significant positive effect against SA Objective 2 (Services) and a minor positive effect against SA Objective 4 (Community Cohesion) because it seeks to ensure access to new and/or enhanced indoor and outdoor recreation and leisure facilities, some of which will be used by the community. Therefore, people who may not normally have access to these facilities would have access to these facilities, which would help reduce inequality and promote community events. As such, a minor positive effect is also expected against SA Objective 5 (Health).

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# DRAFT

## Policy LF6 – Local Green Space

SA Objective	Policy LF6
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	+
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	+
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	+
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.248** Policy LF6 (Local Green Space) is expected to have minor positive effects against SA Objective 2 (Services) and SA Objective 4 (Community Cohesion) because development that results in the loss of a Local Green Space will not be permitted unless the criteria set out in the policy can be met.

**5.249** A minor positive effect is expected against SA Objective 10 (Biodiversity and Geodiversity) because the policy prevents the loss of Local Green Spaces, which may have some biodiversity value.

**5.250** It is also expected that preventing the loss of Local Green Spaces will help enhance the local landscape/townscape. Therefore, a minor positive effect is expected in relation to SA Objective 8 (Landscape).

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## Policy LF7 – Minor Amenity Land

SA Objective	Policy LF7
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	+
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.251** Policy LF7 (Minor Amenity Land) is expected to have a minor positive effect against SA Objective 8 (Landscape) because it prevents the loss of Minor Amenity Land (e.g. roadside verges), which contribute to the character and visual amenity of an area.

**5.252** A minor positive effect is also expected in relation to SA Objective 10 (Biodiversity and Geodiversity) because although Minor Amenity Space will be retained, it is unlikely to have much biodiversity value.

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## Sustainable Travel

### Policy ST1 – Strategic Approach to Transport

SA Objective	Policy ST1
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	++/-?
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	++/-
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0



**5.253** Policy ST1 (Strategic Approach to Transport) is expected to have a mixed significant positive and minor negative but uncertain effect against SA Objective 9 (Greenhouse Gas Emissions) because it requires growth to reflect a site's connectivity and accessibility by public transport, walking and cycling. Therefore, growth will be encouraged in areas that experience good accessibility by these more sustainable modes of transport. The policy also makes reference to securing a modal shift towards sustainable transport modes. However, the policy requires development to provide access for all users of the highway network and may therefore make journeys by private vehicle more efficient by shortening overall journey times and minimising congestion, although this is uncertain.

**5.254** For the reasons outlined above, a mixed significant positive and minor negative effect is also expected against SA Objective 13 (Air Quality). Whilst encouraging public transport, walking and cycling will help reduce vehicular emissions, ensuring access for all users of the highway network.

**5.255** A minor positive effect is expected against SA Objective 5 (Health) because encouraging more active modes of transport will increase levels physical exercise and may also help minimise air pollution.

## Policy ST2 – Hertsmere’s Transport Network and Supporting Infrastructure

SA Objective	Policy ST2
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	+
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	+
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	++
10. To protect and enhance biodiversity and geodiversity.	++
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	++
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.256** Policy ST2 (Hertsmere's Transport Network and Supporting Infrastructure) is expected to have a significant positive effect against SA Objective 9 (Greenhouse Gas Emissions) because its primary focus is to encourage sustainable travel patterns across Hertsmere Borough, including within the strategic allocations in the Plan. The policy requires strategic allocations to support the delivery of local and strategic transport schemes, such as car clubs, pedestrian and cyclist priority within and between town/district centres and opportunities for new and alternative transport networks, in addition to subsidising new or improved bus services for an initial period as agreed with the Local Planning Authority. Generally, the policy seeks to enhance walking, cycling and levels of public transport use.

**5.257** A significant positive effect is expected against SA Objective 13 (Air Quality) because promoting walking and cycling, in addition to public transport use, is also expected to minimise air pollution.

**5.258** Encouraging walking and cycling will improve people's fitness levels, whilst also having beneficial effects on their mental wellbeing. As mentioned previously, it is also likely that the air will be cleaner as a result of these measures. Therefore, a minor positive effect is expected against SA Objective 5 (Health).

**5.259** According to the policy, improved accessibility to local services and open space will also be delivered. Therefore, a minor positive effect is expected in relation to SA Objective 2 (Services). Improved accessibility to open space will also contribute to the significant positive effect already recorded against SA Objective 5 (Health).

**5.260** Policy T2 requires strategic allocations to deliver biodiversity enhancements and greenway improvements, enhancing the environment in which people walk and cycle. These measures will also help protect or establish ecological networks across the Borough. Therefore, a minor positive effect is expected in relation to SA Objective 10 (Biodiversity and Geodiversity).

# DRAFT

## Policy ST3 – Reducing Emissions and Promoting Health and Wellbeing

SA Objective	Policy ST3
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	+
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	++
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	++
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0

**5.261** Policy ST3 (Reducing Emissions and Promoting Health and Wellbeing) requires new proposals to be served by sustainable transport modes, with the intention to reduce and/or mitigate the environmental impacts associated with car travel. According to the policy, access to and from sites will be improved for cyclists and pedestrians. Further to this, steps have been taken to create walkable developments, with a range of services and facilities within a 15 minute walk of each other. Therefore, a significant positive effect is expected in relation to SA Objective 9 (Greenhouse Gas Emissions). These measures are also expected to minimise air pollution, with a significant positive effect also expected against SA Objective 13 (Air Quality).

**5.262** The provision of improved access routes for cyclists and pedestrians will encourage physical activity, with positive effects on people's physical health. New proposals are required to demonstrate that any new facilities will be safely and affordably accessed from areas with recorded levels of deprivation, which will help reduce inequality. There is also a requirement for development proposals to promote health and wellbeing initiatives, in addition to reducing social isolation and increasing possibilities for social interaction. Therefore, a minor positive effect is expected in relation to SA Objective 5 (Health). A minor positive effect is expected against SA Objective 2 (Services) due to the potential delivery of new facilities, that are accessible by all.

# DRAFT

## Policy ST4 – The Highway Network and Vehicular Parking

SA Objective	Policy ST4
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	++/-
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	++/-
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	+

**5.263** Policy ST4 (The Highway Network and Vehicular Parking) is expected to have a mixed significant positive and minor negative effect against SA Objective 9 (Greenhouse Gas Emissions) and SA Objective 13 (Air Quality) because major trip generating development will only be permitted where all opportunities have been taken to increase sustainable travel opportunities, which are less polluting than the private car. Indeed, the policy promotes sustainable transport modes, whilst also requiring the production of travel plans. However, the policy references the road network and the standards road upgrades must meet, whilst also making provision for parking spaces which could potentially encourage use of the private car. Road upgrades may result in making journeys by private vehicle more efficient by reducing delays and congestion.

**5.264** A minor positive effect is expected in relation to SA Objective 15 (Economy) because this policy only permits trip generating development at town centre locations, and other areas of greater public transport accessibility, where services and facilities tend to be located. This is likely to increase footfall in town centres, with positive effects on the economy.

**5.265** A minor positive effect is expected against SA Objective 5 (Health) because provision will be made for disabled parking, ensuring development is accessible to those with disabilities.

## Policy ST5 – Electric Vehicles and Mobility Initiatives

SA Objective	Policy ST5
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	+?
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	++
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	++
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	0



**5.266** Policy ST5 (Electric Vehicles and Mobility Initiatives) is expected to have a significant positive effect against SA Objective 9 (Greenhouse Gas Emissions) and SA Objective 13 (Air Quality). This is due to the fact the use of new vehicular technologies (e.g. electric vehicles) and car share schemes would work towards significantly reducing emissions generated by petrol and diesel cars. This is also the case with bicycle/scooter hire schemes, as mentioned towards the end of this policy.

**5.267** A minor positive but uncertain effect is expected against SA Objective 5 (Health) because promoting use of electric vehicles and car share schemes may help minimise air pollution, with beneficial effects on people's health. The effect is recorded as uncertain because some particulate pollution, which is most harmful to human health, is from the microscopic wear of tyres.

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## Policy ST6 – Aviation Safeguarding

SA Objective	Policy ST6
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	+
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	+

**5.268** Policy ST6 (Aviation Safeguarding) is expected to have a minor positive effect against SA Objective 4 (Community Cohesion) because this objective relates to safety, and the purpose of aviation safeguarding is to ensure the safety of an aircraft while taking off and landing or flying within the vicinity of aerodromes.

**5.269** A minor positive effect is expected against SA Objective 15 (Economy) because safeguarding the aerodrome will ensure its continued operation, with positive effects on the economy.

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## Vibrant Town Centres

### Policy VTC1 – Retail and Town Centre Strategy

SA Objective	Policy VTC1
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	++
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	+
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	?
5. To improve population's health and reduce inequalities.	+?
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	++/-

**5.270** Policy VTC1 (Retail and Town Centre Strategy) supports development within designated Town and District Centres, for business, leisure, cultural and other town centre uses. The Policy specifically states that proposals should seek out opportunities for bringing forward schemes with direct investment towards Hertsmere Borough's Town, District and Local Centres. Therefore, a significant positive effect is expected against SA Objective 2 (Services). The policy states that new centres delivered as part of strategic site allocations should avoid having a detrimental impact on the role and function of existing Town and District Centres. Indeed, new retail and leisure proposals which meet the thresholds set out in this policy, require the submission of an Impact Assessment. Therefore, a significant positive effect is also expected against SA Objective 15 (Economy). However, this effect is mixed with a minor negative effect because focusing development in Town and District Centres will not help support more rural economies.

**5.271** According to the policy, proposals should seek out opportunities for urban regeneration projects. Regeneration projects can help address inequality in more deprived areas and therefore a minor positive but uncertain effect is expected in relation to SA Objective 5 (Health).

**5.272** An uncertain effect is expected against SA Objective 4 (Community Cohesion) because the policy states that the Council will consider Article 4 Directions within designated core frontages, to prevent the introduction of permitted development, which can undermine the objectives of the Plan. Permitted development rights could potentially result in the loss of town centre uses to residential conversions, although this is dependent on what the Article 4 Direction may be.

**5.273** A minor positive effect is expected against SA Objective 3 (Housing Provision) because the policy supports mixed-use development, which will include residential dwellings.

**5.274** A minor positive effect is expected against SA Objective 8 (Landscape) because the policy requires high quality design and enhancements to the character of the area.

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## Policy VTC2 – Retail and Local Centre Hierarchy

SA Objective	Policy VTC2
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	++
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	++

**5.275** Policy VTC2 (Retail and Local Centre Hierarchy) aligns retail, business and service uses within the defined Retail and Local Centre Hierarchy. According to the policy, new retail activity should be focused in the larger settlements within the Primary Shopping Areas. Outside of larger settlements, local shopping facilities should be retained within Local and Neighbourhood Centres, commensurate to their location in the Retail and Local Centre Hierarchy. Therefore, a significant positive effect is expected in relation to SA Objective 2 (Services).

**5.276** The policy states that the Council will consider the need for controls over new retail floorspace in out of town locations, which will have beneficial effects on the vitality and viability of town centres. Furthermore, reference is made to rural diversification, provided it does not result in adverse effects on primary shopping areas. Therefore, a significant positive effect is also expected against SA Objective 15 (Economy).

## Policy VTC3: Town centre regeneration and Opportunity Areas

SA Objective	Policy VTC3
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities <sup>18</sup> for all residents.	++
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	+
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	+
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets <sup>19</sup> and their settings.	+
8. To maintain and enhance the quality of countryside and landscape.	+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	++/-
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	+
13. To improve local air quality.	++/-
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	++

<sup>18</sup> Essential services and facilities relevant to this objective include those discussed in the appraisal questions, as well as education and health facilities, which are assessed via SA objective 1 and SA objective 5. This objective relates to overall accessibility to a range of services and facilities, whilst SA Objectives 1 and 5 relate to health and education specifically, and will primarily be assessed through consideration of proximity and provision of facilities.

<sup>19</sup> As per the NPPF (2021) heritage assets are taken to include 'A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.'



**5.277** Policy VTC3 (Town centre regeneration and Opportunity Areas) sets out the criteria which development within Hertsmere's Key Opportunity Areas and Sites should meet. These locations are amongst the most accessible to residents in the plan area given their town centre locations where sustainable transport links are relatively frequent. The policy seeks to regenerate key centres, protect existing service provision across the locations identified to ensure community needs continue to be met, and supports mixed use development (including retail). A significant positive effect is expected in relation to SA objective 2 (Services and Facilities), as this policy will further improve services and facilities in accessible locations.

**5.278** The delivery of new homes as part of mixed use development at these locations will contribute to meeting the need for housing in Hertsmere. A minor positive effect is therefore recorded in relation to SA objective 3 (Housing). The policy requires that across all Key Opportunity Areas and Sites applications for development should demonstrate that suitable consideration has been given to the local community's needs and the protection of existing facilities, which is expected to include community space. In relation to Borehamwood town centre, the policy requires that proposals work with the creative sector and local community groups, which is expected to help strengthen the identity of the town centre. A minor positive effect is expected in relation to SA objective 4 (Community Cohesion).

**5.279** By maintaining services and facilities including the retail core of town centre locations and improving active travel links to these areas, the policy is likely to encourage walking and cycling amongst a large proportion of residents. Furthermore, the policy specifically requires that development proposals relating to the Radlett Village Institute maintain and enhance use of the site as a social, community and/or health facility. At Borehamwood and Darkes Lane Opportunity Areas development should improve the quality and accessibility of open space which may help to encourage the use of these facilities by residents as part of more active lifestyles. A minor positive effect is expected in relation to SA objective 5 (Health).

**5.280** The policy requires the creation of an improved street scene and town centre environment including through the provision an active and vibrant frontage at a number of location as well as delivery of improved quality of and access to open space. Furthermore, at the Red House Surgery and Post Office, development proposals should enhance the character and appearance of the Radlett (North) and Radlett (South) Conservation Areas and respect the appearance of the existing Post Office building. It is expected that these requirements will help to maintain and improve the aesthetic quality of the town centre and Opportunity Areas. This is likely to benefit the setting of heritage assets (including those

specifically identified) as well as the established character of the locations in question. A minor positive effect is therefore expected in relation to SA objectives 7 (Historic Environment) and 8 (Landscape).

**5.281** As discussed in relation to SA objective 5 (Health) the policy may help to encourage trips to be made by active (and public) modes of transport, given the shorter journey times involved. The policy also directly requires that developments support improved public transport access and help to reduce levels of traffic at town centre locations. The delivery of mixed use development will also result in some new residents having very good levels of access to existing services and facilities at town centre locations with the potential for trips to be undertaken by active modes particularly high amongst these groups. However, the policy also requires the retention of existing or provision of new parking facilities at Borehamwood, Darkes Lane and Newberries Car Park which may limit the potential to achieve substantial levels of modal shift. A mixed significant positive and minor negative effect is therefore expected in relation to SA objective 9 (Greenhouse Gas Emissions).

**5.282** The policy directly requires that proposals for Newberries Car Park are informed by discussions with the Environment Agency in relation to flood risk and mitigation. This is likely to help limit the potential for new development to increase flood risk in the area or for new businesses being affected by flood risk at this location. A minor positive effect is therefore expected in relation to SA objective 12 (Flood Risk).

**5.283** The potential to reduce the need to travel by car in the plan area (considered in the context of the parking requirements at town centre locations) as discussed in relation to greenhouse gases (SA objective 9) are also likely to help limit air pollution in Hertsmere. However, there are AQMAs at town centre locations in both Potters Bar and Borehamwood and the policy could result in some increased travel within these areas by making them more attractive to residents and visitors. While many of these journeys are likely to be made by public transport, these modes of transport still have the potential to contribute to air pollution within the AQMAs. Furthermore, the policy requires that proposals for Borehamwood Opportunity Area should improve air quality along Shenley Road, which may also limit the potential for adverse impacts on AQMA within the Borehamwood town centre. A mixed significant positive and minor negative effect is therefore expected in relation to SA objective 13 (Air Quality).

**5.284** The policy seeks to ensure the vitality of the town centres in Hertsmere, taking into account any Covid-19 recovery plans and the compatibility of the proposed uses at new developments. It will also help to future-proof high street locations and local centres as new technologies emerge and

consumer behaviours change. This will enable town centre locations to support the continued economic growth of Hertsmere and allow for sustainable job creation at these locations. A significant positive effect is therefore expected in relation to SA objective 15 (Economic Growth).

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## Policy VTC4 – Non-commercial, Business and Service Uses

SA Objective	Policy VTC4
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	+
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	+

**5.285** Policy VTC4 (Non-Commercial, Business and Service Uses) is expected to have a minor positive effect in relation to SA Objective 15 (Economy) because it prevents non-E class uses from being implemented at ground floor level in the Borough's Primary Shopping Areas, unless a set of criteria can be met. The purpose of this is to safeguard Primary Shopping Areas and avert any negative impact on the retail image of an area.

**5.286** A minor positive effect is expected against SA Objective 2 (Services) because this policy protects the services and facilities that tend to be found in Primary Shopping Areas from being lost to other types of development.

**5.287** Policy VTC4 states that where a hot food takeaway is clearly visible from any entrance or access point to a secondary school, the proposed use must not undermine any existing or proposed healthy eating policy at the school. This is likely to result in health benefits, with a minor positive effect expected against SA Objective 5 (Health). Furthermore, according to this policy, if non-E class uses are permitted at ground floor level in Primary Shopping Areas, they must not result in unacceptable levels of noise, odours, traffic, parking demand, general disturbance and nuisance, which is likely to benefit residential amenity. This is also likely to have beneficial effects on people's wellbeing. They must also not have a detrimental impact on the character of the local area and therefore a minor positive effect is expected in relation to SA Objective 8 (Landscape).

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## Policy VTC5 – Residential Development in Town Centres

SA Objective	Policy VTC5
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	+
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	+
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	+
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	+

**5.288** Policy VTC5 (Residential Development in Town Centres) is expected to have a minor positive effect against SA Objective 3 (Housing Provision) because although residential accommodation is not permitted at ground floor level in town centres unless the set of criteria in the policy can be met, it is permitted on above ground floor premises. The policy also states that where an application is for the construction of new homes within town centre locations, consideration must be given to the impact of development on existing town centre uses and compatibility of the proposed use, the character and appearance of the town centre, in addition to noise, transport and highways impacts.

**5.289** A minor positive effect is expected against SA Objective 8 (Landscape) because if the construction of new homes were to be permitted in town centre locations, the policy states that consideration should be given to the appearance of the town ('the townscape'). A minor positive effect is also expected against SA Objective 5 (Health) because development must not have an adverse effect on residential amenity.

**5.290** A minor positive effect is expected against SA Objective 15 (Economy) because preventing residential development at ground floor level will avert any negative impact on the retail image of a town centre, which will support the vitality and viability of town centres in Hertsmere Borough.

**5.291** Supporting residential development in town centres will ensure that residents are located within close proximity to the services and facilities found in town centre locations. Therefore, a minor positive effect is expected in relation to SA Objective 2 (Services). A minor positive effect is also expected in relation to SA Objective 9 (Greenhouse Gas Emissions) and SA Objective 13 (Air Quality) because having people located within close proximity to amenities will reduce their need to travel further afield via private car. This will help minimise greenhouse gas emissions, whilst also minimising air pollution.

## Policy VTC6 – Creating New Retail Centres in Strategic Housing Allocations

SA Objective	Policy VTC6
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	++
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	+
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	++
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	++
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	+

**5.292** Policy VTC6 (Creating New Retail Centres in Strategic Housing Allocations) is expected to have a significant positive effect against SA Objective 2 (Services) because it promotes the development of local and neighbourhood retail centres in strategic housing allocations. As such, people will be located within close proximity to these new centres, which will encourage walking and cycling, whilst also reducing their reliance on the private car. Indeed, the policy states that these new retail centres must be made accessible through a variety of transport modes, including public transport, walking and cycling. This is expected to reduce air pollution. Therefore, significant positive effects are also expected in relation to SA Objective 9 (Greenhouse Gas Emissions) and SA Objective 13 (Air Quality). A minor positive effect is expected against SA Objective 5 (Health) because people will be encouraged to be more active.

**5.293** Policy VTC6 states that proposals for new centres within large residential allocations will be supported provided they do not adversely impact on existing retail and local centres. A minor positive effect is therefore expected against SA Objective 15 (Economy).

**5.294** A minor positive effect is expected in relation to SA Objective 4 (Community Cohesion) because the policy states that planning conditions may be applied to manage land use change within Class E within newly created centres, to ensure a suitable range of services is retained.



## Policy VTC7 – Primary Shopping Areas and Edge or Out of Centre Development

SA Objective	Policy VTC7
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	++
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	+
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	++

**5.295** Policy VTC7 (Primary Shopping Areas and Edge or Out of Centre Development) supports proposals for Class E development in Primary Shopping Areas, provided they do not have a detrimental impact on the character and function of an area. As set out in Policy RTC6, development should enhance the vitality and viability of town centres. Development proposals outside of core frontages will only be supported if they comprise at least 70% of the total number of units across the designated Primary Shopping Area.. Similarly, edge of centre development will only be permitted if the sequential test and an impact assessment have been applied. Therefore, overall, significant positive effects are expected against SA Objective 2 (Services) and SA Objective 15 (Economy).

**5.296** A minor positive effect is expected in relation to SA Objective 4 (Community Cohesion) because the policy makes reference to active frontages, which improves the safety of an area through 'eyes on the street'.

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## Policy VTC8 – Core Frontages

SA Objective	Policy VTC8
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	++
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	++

**5.297** Policy VTC8 (Core Frontages) supports development proposals which retain Class E uses at ground floor level within the town centres of the larger settlements. Non-Class E uses will only be permitted if the set of criteria outlined in the policy are met, and the proposals do not exceed the thresholds set out in the policy. These measures are expected to protect the primary function of the town centres by retaining the services and facilities present within these locations, whilst also having beneficial effects on the economy. Therefore, significant positive effects are expected in relation to SA Objective 2 (Services) and SA Objective 15 (Economy).

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## Policy VTC9 – Local and Neighbourhood Centres and Individual Stores

SA Objective	Policy VTC9
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	++
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	0
5. To improve population's health and reduce inequalities.	0
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	+
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	0
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	0
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	+

**5.298** Policy VTC9 (Local and Neighbourhood Centres and Individual Stores) seeks to protect shops and/or local services but sets out circumstances where proposals to replace them will be permitted. This includes evidence that there is no longer demand for the shop and/or local service. Therefore, a significant positive effect is expected in relation to SA Objective 2 (Services) and a minor positive effect in relation to SA Objective 15 (Economy).

**5.299** It is likely that this policy will reduce the number of vacant units present within local and neighbourhood centres, which will have a beneficial effect on the townscape. Therefore, a minor positive effect is expected against SA Objective 8 (Landscape).

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## Policy VTC10 – Promoting a Safe and Attractive Daytime and Evening Economy

SA Objective	Policy VTC10
1. To improve access to education, training, opportunities for lifelong learning and employability.	0
2. To ensure ready access to essential services and facilities for all residents.	+
3. To ensure the provision of housing, including affordable housing and a mix that meets local needs.	0
4. To improve community cohesion by reducing and preventing crime and deprivation, as well as providing sufficient community spaces.	++
5. To improve population's health and reduce inequalities.	+
6. To safeguard soil quantity and quality including reducing contamination and prioritising previously developed land, as well as protecting mineral resources.	0
7. To protect and, where appropriate, enhance heritage assets and their settings.	0
8. To maintain and enhance the quality of countryside and landscape.	0
9. To reduce greenhouse gas emissions, including a reduced dependence on the private car.	+/-
10. To protect and enhance biodiversity and geodiversity.	0
11. To improve water quality and manage water resources sustainably.	0
12. To minimise the risk of flooding taking account of climate change.	0
13. To improve local air quality.	+/-
14. To minimise the need for energy, increase energy efficiency, and to increase the use of renewable energy.	0
15. Facilitate a sustainable and growing economy for the Borough that creates economic and employment opportunities, as well as providing for vital and viable town centres.	++

**5.300** Policy VTC10 (Promoting a Safe and Attractive Daytime and Evening Economy) promotes the daytime and evening economy by supporting proposals for entertainment and leisure facilities, late night retailing and eating and drinking establishments. Therefore, a significant positive effect is expected against SA Objective 15 (Economy) and a minor positive effect against SA Objective 2 (Services).

**5.301** The policy states that proposals must promote a safe and healthier environment by tackling crime and anti-social behaviour, reducing drug and alcohol misuse, and avoiding hot food takeaways near schools. Feelings of safety in the community should also be increased. Specific details on how this will be achieved are provided towards the end of the policy, and include provision of lighting, use of CCTV and Alcohol Free Zones. Therefore, a significant positive effect is expected in relation to SA Objective 4 (Community Cohesion).

**5.302** The uses set out in Policy VTC10 will be supported, provided they do not have an adverse effect on amenity, and incorporate access arrangements for people of all ages and abilities. This will help reduce inequality in access to these uses. Therefore, a minor positive effect is expected against SA Objective 5 (Health).

**5.303** According to the policy, adequate levels of parking and public transport should be available. Although availability of public transport would reduce reliance on the private car, availability of parking spaces could encourage use of the private car. Use of the private car would contribute to greenhouse gas emissions, in addition to air pollution. Therefore, mixed minor positive and minor negative effects are expected in relation to SA Objective 9 (Greenhouse Gas Emissions) and SA Objective 13 (Air Quality).



## Chapter 6

### Cumulative and In-Combination Effects of the Draft Local Plan

**6.1 Chapter 5** sets out the likely effects of the individual policies and site allocations set out in the Local Plan. A summary of the SA effects of all policies is set out in **Table 6.1**. This section brings together these effects of the separate elements to describe the likely cumulative effects of the Local Plan as a whole. In addition, consideration is given to any effects that may arise in-combination with planned strategic growth in surrounding areas and/or other strategic development projects. This chapter also recommends measures to mitigate any residual effects of the Local Plan.

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Table 6.1: Summary of likely effects for policies in the Draft Local Plan

	SA1: Education	SA2: Services	SA3: Housing Provision	SA4: Community Cohesion	SA5: Health	SA6: Soil and Minerals	SA7: Historic Environment	SA8: Landscape	SA9: Greenhouse Gas Emissions	SA10: Biodiversity and Geodiversity	SA11: Water Quality and Quantity	SA12: Flooding	SA13: Air Quality	SA14: Energy Efficiency	SA15: Economy
Policy SG1 - Creating Sustainable Development	+	++	++	+	++	++	++	+	++	++	+	+	+	++	++
Policy SG2 - Resilience Against Climate Change	0	0	0	0	+	++	0	++	++	++	++	++	+	++	0
Policy SG3 – Presumption in Favour of Sustainable Development	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
Policy SG4 – Infrastructure Delivery and Monitoring Strategy	++?	++?	0	++?	++?	+	0	-?	++?/-?	++?	++?	++?	++?/-?	++?	++?
Policy SG5 – Infrastructure Provision and Supporting Growth	++?	++?	0	++?	++?	0	0	-?	++?/-?	++?	++?	++?	++?/-?	++?	++?
Policy SG6 – Developer Contributions	++	++	++	++	++	0	0	++/-?	++/-	++	++	++	++/-	++	++
Policy SG7 - Health and Wellbeing	0	++	+	++	++	0	0	0	++	++/-?	++/-?	0	+	0	0
Policy H1- The Supply of New Homes	0	+	++	0	0	+	0	0	0	+	+	+	0	0	+
Policy H2 - Affordable Housing	0	0	++	+	+	0	0	0	0	0	0	0	0	0	+
Policy H3 - Affordable Housing on Rural or First Homes Exception Sites	0	0	++	+	+	+	0	+	0	+	0	0	0	0	0
Policy H4 Provision for Gypsies and Travellers	+	+	++	+	+	0	0	+	0	0	+	0	0	0	0
Policy H5 New and Extended Park Homes Sites	+	+	++	+	+	0	0	+	0	0	+	0	0	0	0

# DRAFT

	SA1: Education	SA2: Services	SA3: Housing Provision	SA4: Community Cohesion	SA5: Health	SA6: Soil and Minerals	SA7: Historic Environment	SA8: Landscape	SA9: Greenhouse Gas	SA10: Biodiversity and	SA11: Water Quality and	SA12: Flooding	SA13: Air Quality	SA14: Energy Efficiency	SA15: Economy
Policy H6 - Housing Mix	0	0	++	0	+	0	0	0	0	0	0	0	0	0	+?
Policy H7 - Specialist Housing with Support or Care	0	+	++	+	++	0	0	0	+	0	0	0	+	0	+
Policy H8 - Redevelopment and Loss of Residential Units	0	0	+?	0	0	0	0	+	0	0	0	0	0	0	0
Policy H9 - Self-Build and Custom-Build Homes	0	0	++	0	+?	0	0	+?	0	0	0	0	0	0	0
Policy H10 - Housing Land	++/-	++/-	++	+/-	++/-	--/+	--?/+	--/+	++/-	--?/+	-	-?	--/+	0	++
Policy E1: Scale and Distribution of Employment Land	+	0	0	0	+	+	0	+	+	0	0	0	0	0	++
Policy E2: Ensuring Suitable Provision of Employment Land	+	0	0	0	--/+	+/-	--?	--?/+	--/+	-?	-?	-	--?	0	++
Policy E3: Land Use Within Designated Employment Areas	+	0	0	0	0	+	0	0	0	0	0	0	0	0	++
Policy E4: South Mimms Motorway Services Area	0	+	0	0	-	-	-?	+/-	+/-	--?	0	0	--/+	0	++
Policy E5: Elstree Aerodrome	+	0	0	0	+	+	0	+	+/-	-?	0	0	+/-	0	++
Policy E6: Rowley Lane Studio Quarter	++	+	0	+	+	+/-	0	+/-	++/-	+/-?	0	+/-	--/+	++	++
Policy E7: A Flexible Local Economy	+	0	0	0	0	0	0	0	+	0	0	0	+	0	++
Policy E8: Promoting the Film and Television Industry	0	0	0	0	0	0	+?	0	0	0?	0?	0?	0	0	++
Policy E9: Securing Mixed-Use Development	+?	+	+	+	+	0	0	0	+/-	+?	+?	+?	+/-	0	++

# DRAFT

	SA1: Education	SA2: Services	SA3: Housing Provision	SA4: Community Cohesion	SA5: Health	SA6: Soil and Minerals	SA7: Historic Environment	SA8: Landscape	SA9: Greenhouse Gas	SA10: Biodiversity and	SA11: Water Quality and	SA12: Flooding	SA13: Air Quality	SA14: Energy Efficiency	SA15: Economy
Policy E10: Providing Local Employment Skills and Opportunities	++	0	0	+	++	0	0	0	0	0	0	0	0	0	++
Policy GB1 - The Green Belt	0	0	+/-	0	0	++?	0	+	0	0	0	0	0	0	0
Policy GB2 - Compensatory Green Belt Improvements	0	++?	-?	0	++?	0	0	++?	0	++?	0	0	0	0	0
Policy GB3 - Key Green Belt Sites	0	-?	+/-	0	0	+	+	+	0	-?	0	0	0	0	0
Policy GB4 – Development Standards in the Green Belt	0	+	-?	0	0	0	0	++	0	++	0	0	0	0	0
Policy CC1 - Climate Change Mitigation	0	++	0	0	++		0	+	++	+	++	++	0	++	0
Policy CC2 - Greenhouse Gas Reductions	0	0	-?	0	0	0	0	0	++	0	0	0	0	++	0
Policy CC3 - Energy Generation	0	0	0	0	+	0	0	0	0	0	0	0	0	++	0
Policy CC4 - Natural Cooling	0	0	0	0	+	0	0	++	0	++	0	0	0	++	0
Policy DL1 - Making Effective Use of Land	++?	++	0	0	+	++	0	+	+	0	++?	++?	+	0	+
Policy DL2 - High Quality, Safe and Accessible Development	0	+	++/-	++	++	+	0	++	++	+	0	0	+	++	0
Policy DL3 – Design Standards for Flats, Maisonettes and Houses in Multiple Occupation	0	0	+	0	+	0	0	0	+	0	0	0	0	0	++?
Policy DL4 - Health Impact Assessments	0	++?	0	++?	++	0	0	0	++?	++?/- ?	++?/- ?	0	++?	0	0
Policy DL5 - Waste Arisings	0	0	0	0	0	++	0	0	+	0	0	0	0	0	0

# DRAFT

	SA1: Education	SA2: Services	SA3: Housing Provision	SA4: Community Cohesion	SA5: Health	SA6: Soil and Minerals	SA7: Historic Environment	SA8: Landscape	SA9: Greenhouse Gas	SA10: Biodiversity and	SA11: Water Quality and	SA12: Flooding	SA13: Air Quality	SA14: Energy Efficiency	SA15: Economy
Policy HE1 – Heritage Assets and Their Setting	0	0	0	0	0	0	++?	+	0	0	0	0	0	0	0
Policy HE2 – Listed Buildings and Their Setting	0	0	-?	0	0	0	++	+	0	0	0	0	0	0	-?
Policy HE3 – Conservation Areas and Their Setting	0	0	0	0	0	0	++	++	0	0	0	0	0	0	0
Policy HE4 – Archaeology	0	0	0	0	0	0	++?	0	0	0	0	0	0	0	0
Policy ENV1 – Environmental Impact of Development	0	0	0	0	+	+	0	0	0	+	+	0	+	0	0
Policy ENV2 – Hazardous Substances	0	0	0	0	0	+	0	0	0	0	+	0	0	0	0
Policy ENV3 – Biodiversity Strategy	0	0	-?	0	0	0	0	0	0	++	0	0	0	0	0
Policy ENV4 – Sites of Biodiversity Value	0	0	0	0	0	0	0	0	0	++?	0	0	0	0	0
Policy ENV5 – Landscape Character	0	0	0	0	0	0	+	++	0	++	0	0	0	0	0
Policy ENV6 – Development on Agricultural Land	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0
Policy ENV7 – Trees, Landscape and Development	0	++	0	+	++	0	0	++	0	+	0	0	0	0	0
Policy ENV8 – Green and Blue Infrastructure	0	++	-?	++	+	0	0	++	++	++	+	+	++	0	+
Policy ENV9 – Groundwater Source Protection Zones	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0
Policy ENV10 – Flood Risk and Drainage	0	+	0	0	0	0	0	+	0	+	0	++	0	0	0

# DRAFT

	SA1: Education	SA2: Services	SA3: Housing Provision	SA4: Community Cohesion	SA5: Health	SA6: Soil and Minerals	SA7: Historic Environment	SA8: Landscape	SA9: Greenhouse Gas Emissions	SA10: Biodiversity and Geodiversity	SA11: Water Quality and Quantity	SA12: Flooding	SA13: Air Quality	SA14: Energy Efficiency	SA15: Economy
Policy ENV11 - Sustainable Drainage Systems, Grey Water Recycling and Water Management	0	+	0	0	0	0	0	0	0	++	++	++	0	0	0
Policy ENV12 - Watercourses and Infrastructure	0	0	0	0	0	0	0	0	0	++	++	0	0	0	0
Policy ENV13 – Mineral Consultation Area	0	0	0	0	0	++	0	0	0	0	0	0	0	0	0
Policy LF1 – Protecting Key Community Facilities	0	++	0	++	+	0	0	0	0	0	0	0	0	0	0
Policy LF2 – New or Enhanced Social and Community Facilities	0	++	0	++	+	0	0	0	+	0	0	0	+	0	0
Policy LF3 - Protecting Open Space, Sport and Recreation Facilities	0	++	0	+	+	0	0	+	+	+	+	+	+	0	0
Policy LF4 – Open Space and Recreation Facilities Standards for New Development	0	++	0	+	+	0	0	+	+	++	+	+	+	0	0
Policy LF5 - Community Access to Recreation and Leisure Facilities	0	++	0	+	+	0	0	0	0	0	0	0	0	0	0
Policy LF6 – Local Green Space	0	+	0	+	0	0	0	+	0	+	0	0	0	0	0
Policy LF7 – Minor Amenity Land	0	0	0	0	0	0	0	+	0	+	0	0	0	0	0
Policy ST1 - Strategic Approach to Transport	0	0	0	0	+	0	0	0	++/-?	0	0	0	++/-	0	0
Policy ST2 - Hertsmere's Transport Network and Supporting Infrastructure	0	+	0	+	+	0	0	0	++	++	0	0	++	0	0
Policy ST3 - Reducing Emissions and Promoting Health and Wellbeing	0	+	0	0	+	0	0	0	++	0	0	0	++	0	0

# DRAFT

	SA1: Education	SA2: Services	SA3: Housing Provision	SA4: Community Cohesion	SA5: Health	SA6: Soil and Minerals	SA7: Historic Environment	SA8: Landscape	SA9: Greenhouse Gas Emissions	SA10: Biodiversity and Geodiversity	SA11: Water Quality and Quantity	SA12: Flooding	SA13: Air Quality	SA14: Energy Efficiency	SA15: Economy
Policy ST4 – The Highway Network and Vehicular Parking	0	0	0	0	+	0	0	0	++/-	0	0	0	++/-	0	+
Policy ST5 - Electric Vehicles and Mobility Initiatives	0	0	0	0	+?	0	0	0	++	0	0	0	++	0	0
Policy ST6 - Aviation Safeguarding	0	0	0	+	0	0	0	0	0	0	0	0	0	0	+
Policy VTC1 - Retail and Town Centre Strategy	0	++	+	?	+?	0	0	+	0	0	0	0	0	0	++/-
Policy VTC2 - Retail and Local Centre Hierarchy	0	++	0	0	0	0	0	0	0	0	0	0	0	0	++
Policy VTC3 - Town centre regeneration and Opportunity Areas	0	++	+	+	+	0	+	+	++/-	0	0	+	++/-	0	++
Policy VTC4 – Non-Commercial, Business and Services Uses	0	+	0	0	+	0	0	+	0	0	0	0	0	0	+
Policy VTC5 – Residential Development in Town Centres	0	0	+	0	+	0	0	+	+	0	0	0	+	0	+
Policy VTC6 - Creating New Retail Centres in Strategic Housing Allocations	0	++	0	+	+	0	0	0	++	0	0	0	++	0	+
Policy VTC7 – Primary Shopping Areas and Edge or Out of Centre Development	0	++	0	+	0	0	0	0	0	0	0	0	0	0	++
Policy VTC8 - Core Frontages	0	++	0	0	0	0	0	0	0	0	0	0	0	0	++
Policy VTC9 – Local and Neighbourhood Centres and Individual Stores	0	++	0	0	0	0	0	+	0	0	0	0	0	0	+

# DRAFT

	SA1: Education	SA2: Services	SA3: Housing Provision	SA4: Community Cohesion	SA5: Health	SA6: Soil and Minerals	SA7: Historic Environment	SA8: Landscape	SA9: Greenhouse Gas	SA10: Biodiversity and	SA11: Water Quality and	SA12: Flooding	SA13: Air Quality	SA14: Energy Efficiency	SA15: Economy
VTC10 – Promoting a Safe and Attractive Daytime and Evening Economy	0	+	0	++	+	0	0	0	+/-	0	0	0	+/-	0	++

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## Cumulative Effects

### SA objective 1: Education

**6.2** Around half of the allocated housing and mixed use sites are within walking distance of one or both of a primary school and a secondary school. In addition, most strategic site allocations are required to provide new education facilities, contribute to expansion of existing facilities, or provide land for new facilities. Such provision may contribute to meeting the needs of strategic sites and other nearby residents. In addition, Policies SG4: Infrastructure Delivery and Monitoring Strategy, SG5: Infrastructure Provision and Supporting Growth, and SG6: Developer Contributions are expected to ensure that sufficient educational facilities are provided to meet the needs of development.

**6.3** Policy LF2: New or Enhanced Social and Community Facilities proposes new schools at Bushey, Borehamwood and Elstree, Potters Bar, Radlett, South Mimms and Bowmans Cross New Settlement. However, there may still be a lack of provision at certain locations. For example, there is no existing or planned secondary school in Radlett or Shenley, therefore younger residents will likely need to travel to Borehamwood for secondary school.

**6.4** Overall, a significant positive effect is expected for this SA objective, although this is uncertain as there is a possibility that not all new housing will have easy walking access to a school.

### SA objective 2: Services

**6.5** Around half of the allocated housing and mixed use sites are within walking distance of a range of services and facilities, either by being within an area of medium/high or high accessibility or by providing new services and facilities. In addition, most strategic site allocations are required to provide new services and facilities, such as a neighbourhood centre, community facilities, open space and retail, or are required to provide a contribution towards such facilities. Such provision may contribute to meeting the needs of strategic sites and other nearby residents. In addition, Policies SG4: Infrastructure Delivery and Monitoring Strategy, SG5: Infrastructure Provision and Supporting Growth, and SG6: Developer Contributions are expected to ensure that sufficient services and facilities are provided to meet the needs of development.

**6.6** Furthermore, the policies in Section 9 of the Local Plan, 'Local Facilities' seek to protect existing facilities and support the provision of new facilities, which is expected to ensure a suitable quantum of appropriate facilities for residents.

**6.7** Overall, significant positive effects are expected for this SA objective.

### SA objective 3: Housing Provision

**6.8** The plan seeks to meet Hertsmere's full objectively assessed housing need plus a 5% buffer, which equates to a minimum of 12,160 homes between 2022 and 2038. The plan will meet a range of accommodation needs, through Policy H2: Affordable Housing requires larger developments to provide for at least 40% affordable housing of a variety of tenures, and Policies H4: Provision for Gypsies and Travellers, H5: New and extended Park Homes Sites, H6: Housing Mix, H7: Specialist Housing with Support or Care and H9: Self-Build and Custom-Build Homes.

**6.9** As such, overall significant positive effects are expected for this SA objective.

### SA objective 4: Community Cohesion

**6.10** All housing and mixed use allocations are expected to have positive effects (either minor or significant) for this SA objective because they are within 100m of a town, local or neighbourhood centre (or would provide a new centre) and/or one of the 20% most deprived areas with regards to barriers to housing and services. All employment sites are expected to have negligible effects. As well as locating housing around existing hubs, policies that seek to protect, enhance and deliver community services and facilities, such as infrastructure Policies SG4, SG5 and SG6, and local facilities policies LF1 to LF6, are also expected to help foster a sense of community. The plan also contains policies that promote good design, which will help to create safe and attractive places, as well as reducing crime and the fear of crime, such as Policies DL2: High Quality, Safe and Accessible Development and VTC10: Promoting a Safe and Attractive Daytime and Evening Economy.

**6.11** As such, the plan is generally expected to help promote community cohesion. As a totally new community, it will likely take a while for a sense of community to establish at Bowmans Cross New Settlement, particularly in earlier years before neighbourhoods are fully occupied. While provision of open space and promotion of walking and cycling is likely to help foster community cohesion, the vision document and phasing plan should also ensure building a sense of community is integrated from the start. Overall, minor positive effects are expected for this SA objective.

### SA objective 5: Health

**6.12** The majority of housing and mixed use allocations are within walking distance of a healthcare facility and/or public open space, and/or are expected to include this provision. However, many would lead to loss or diversion of public rights of way or are near to sources of noise, air and/or odour pollution. Many allocated employment sites are located within 200m of an A road or motorway, which enables easy access

for deliveries and shipments, but could affect the health and wellbeing of workers (albeit employment uses are considered less sensitive than residential uses). There is a current lack of capacity at healthcare facilities in Hertsmere, which has potential to be exacerbated by housing development. However, the plan requires a number of strategic sites to provide for new or expanded healthcare facilities to serve new development and in particular Policy LF2: New or Enhanced Social and Community Facilities proposes new healthcare facilities at Bushey, Borehamwood and Elstree, Radlett and the new settlement at Bowmans Cross. This provision is expected to largely address existing issues, although it is noted that there may still be a lack of local healthcare provision at Shenley and South Mimms in particular .

**6.13** In addition, Policies SG4: Infrastructure Delivery and Monitoring Strategy, SG5: Infrastructure Provision and Supporting Growth, and SG6: Developer Contributions are expected to ensure timely provision of relevant infrastructure, including healthcare.

**6.14** In terms of wider determinants of health, the plan seeks to create a pleasant and safe environment, through providing a variety of homes to meet differing needs, seeking environmental improvements and adapting to the impacts of climate change.

**6.15** Overall, the plan is expected to have a mixed significant positive and minor negative effect for this SA objective.

### SA objective 6: Soil and Minerals

**6.16** Whilst some site allocations would result in reuse of previously developed land, the majority of site allocations are expected to have negative effects on this SA objective, as most development will take place on greenfield land. This is limited by the amount of brownfield land available in the Borough, and therefore substantial development of greenfield land is to be expected. Most greenfield development will lead to loss of Grade 3 agricultural land, although there will be some loss of Grade 2 agricultural land, particularly at Bowmans Cross New Settlement. Nevertheless, best and most versatile agricultural land is generally expected to be protected in the Borough, as Policy ENV6: Development on Agricultural Land requires loss of such land to be avoided, where possible.

**6.17** Much of the Borough lies within a Mineral Consultation Area, therefore most site allocations have potential to result in sterilization of mineral resources. However, Policy ENV13: Mineral Consultation Area states that development will not be permitted to sterilise or prevent the future extraction of the mineral resource and Hertfordshire County Council will be consulted as appropriate.

**6.18** Overall, mixed minor positive and minor negative effects are expected for this SA objective.

### SA objective 7: Historic Environment

**6.19** The majority of site allocations are expected to have either minor or positive effects on the historic environment because of the large number and distribution of heritage assets across the Borough. However, the plan provides strong protection for the historic environment, including designated and non-designated assets, and encourages the enhancement of this through policies HE1: Heritage Assets and Their Setting, HE2: Listed Buildings and Their Setting, HE3: Conservation Areas and Their Setting and HE4: Archaeology. These policies are considered sufficient to address any concerns related to site allocations.

**6.20** As such, overall minor positive effects are expected with regards to this SA objective.

### SA objective 8: Landscape

**6.21** Most site allocations have potential for adverse effects on landscape, particularly given the amount of more rural land required to meet development needs in the Borough. However, there is also substantial potential for landscape and townscape enhancement through the local plan, as site allocations are required to integrate high quality design and attractive features, such as green space. In addition, Policy ENV7: Trees, Landscape and Development requires development to protect existing landscape features and to create new areas of landscape interest. In conjunction with Policy DL2: High Quality, Safe and Accessible Development, this is expected to ensure development enhances, rather than detracts from the landscape. It is, however, acknowledges that creation of a new settlement at Bowmans Cross will result in long-term, large-scale landscape change, although a new settlement also provides potential to create an attractive new townscape and landscape features.

**6.22** Overall, mixed minor positive and minor negative effects are expected with regards to this SA objective.

### SA objective 9: Greenhouse Gas Emissions

**6.23** Development, and the increased population it serves, will inevitably lead to some increase in greenhouse gas emissions, particularly as a result of increased road traffic (although there will also be an increase in energy use and embodied carbon). However, the plan focuses a large proportion of development at the settlements already best served by services and facilities and public transport: Borehamwood and Elstree, Potters Bar, and Bushey. The other largest concentration of development will be at the new settlement at Bowmans Cross. Whilst there are currently no services, facilities or public transport links at this location,

designing a new settlement from scratch presents an opportunity to design in sustainable travel from the outset. It is important in this case to provide sustainable transport links, services and facilities and local employment opportunities at the outset to ensure that sustainable travel becomes habitual for new residents. Under Policy H10: Housing Land, Bowmans Cross is required to include very good sustainable transport links and the new settlement will be net zero carbon in operation.

**6.24** Policies SG1: Creating Sustainable Development and CC2: Greenhouse Gas Reductions is focused on reducing greenhouse gas emissions, including requiring many developments to achieve net zero greenhouse gas emissions. Additionally, policies ST1: Strategic Approach to Transport, ST3: Reducing Emissions and Promoting Health and Wellbeing, ST5: Electric Vehicles and Mobility Initiatives promote sustainable travel and transport, including reducing the need to travel and low-carbon travel. Policy CC3: Energy Generation also supports proposals for renewable energy, energy storage and heat recovery and Policy CC4: Natural Cooling promotes cooling without reliance on power-hungry air conditioning, all of which will help green the energy network by reducing demand and promoting cleaner energy production.

**6.25** Overall, mixed significant positive and minor negative effects are expected with regards to this SA objective. Uncertainty is associated with this objective, as changing travel patterns (including a permanent increase in home working accelerated by the Covid-19 pandemic), changes in vehicle ownership and a move to more sustainable fuels means that vehicles may be responsible for a much lower proportion of greenhouse gas emissions in future.

### SA objective 10: Biodiversity and Geodiversity

**6.26** Most site allocations have potential for adverse effects on biodiversity and/or geodiversity, particularly given the amount of more rural land required to meet development needs in the Borough, which is likely to be of greater biodiversity (although it is noted that brownfield land can also be of biodiversity importance). However, there is also potential for development to protect and enhance biodiversity, particularly through the provision of green infrastructure. In particular, Policies ENV3: Biodiversity Strategy and ENV4: Sites of Biodiversity Value promote conservation and enhancement of biodiversity, which is expected to avoid any significant adverse effects from site allocations. In particular, these policies are likely to work in tandem with infrastructure delivery policies (SG4, SG5 and SG6), Policies SG1: Creating Sustainable Development, SG2: Resilience Against Climate Change, SG7: Health and Wellbeing and climate change policies and others to deliver multi-functional green infrastructure that benefits both people and wildlife.

**6.27** The HRA highlights potential for the Local Plan to result in adverse effects on the integrity of Epping Forest SAC and Wormley-Hoddesdon Park Woods SAC in terms of increased air pollution. Traffic modelling data is required to investigate this further. It is recommended that traffic modelling is carried out prior to the Council finalising the Local Plan, so that any changes can be made to ensure no adverse effects on the integrity of European sites.

**6.28** Overall, mixed significant positive and minor negative effects are expected for this SA objective. The effects are uncertain given the unresolved issues regarding the effect on air quality on European sites.

### SA objective 11: Water Quality and Quantity

**6.29** All site allocations are expected to have either negligible or minor negative uncertain effects on water quality, depending on whether or not they lie within a Source Protection Zone. However, Policy ENV9: Groundwater Source Protection Zones should ensure that groundwater quality is protected.

**6.30** Development at this scale also has potential to put pressure on wastewater treatment infrastructure, although the 2017 Water Study suggests that this can be managed, with appropriate actions and investment. In addition, development will lead to an increase in water demand, which is a widespread issue given the likely increase in drought events as a result of climate change, and can lead to degradation of the quality of waterbodies and watercourses that water supply is sourced from. Whilst Affinity Water has set out actions to ensure water needs can be met, the plan also encourages efficient use of water through Policy ENV11: Sustainable Drainage Systems, Grey Water Recycling and Water Management. In addition, policy ENV12: Watercourses and Infrastructure seeks to improve the quality of the water environment.

**6.31** Overall, minor positive effects are expected with regards to this SA objective.

### SA objective 12: Flooding

**6.32** The majority of development allocated through the plan is not expected to be at risk of flooding, although cumulatively the development of large areas of greenfield land could reduce surface water runoff and therefore increase surface water flood risk. For most strategic sites that include areas at higher risk of flooding, policies specifically require only flood-compatible uses in these areas or otherwise require suitable drainage on-site. In addition, Policy ENV10 requires development to reduce any existing flood risk within or in proximity to the site and requires a flood risk assessment for any development proposed within a flood risk area. In addition, Policy ENV11: Sustainable Drainage Systems, Grey

Water Recycling and Water Management requires larger new developments to integrate SuDS, which is expected to minimize flood risk both on site and elsewhere.

**6.33** Overall, a minor positive effect is expected with regards to this SA objective.

### SA objective 13: Air quality

**6.34** Development, and the increased population it serves, will inevitably lead to some increase in air pollution, particularly as a result of increased road traffic. However, the plan focuses a large proportion of development at the settlements already best served by services and facilities and public transport: Borehamwood and Elstree, Potters Bar, and Bushey. The other largest concentration of development will be at the new settlement at Bowmans Cross. Whilst there are currently no services, facilities or public transport links at this location, designing a new settlement from scratch presents an opportunity to design in sustainable travel from the outset. It is important in this case to provide sustainable transport links, services and facilities and local employment opportunities at the outset to ensure that sustainable travel becomes habitual for new residents. Under Policy H10: Housing Land, Bowmans Cross is required to include very good sustainable transport links.

**6.35** Policies ENV1: Environmental Impact of Development and ST3: Reducing Emissions and Promoting Health and Wellbeing both seek to minimize air pollution and ENV1 in particular seeks to prevent development that would exacerbate poor air quality within AQMAs and prevent development that would lead to new AQMAs being declared. Additionally, policies ST1: Strategic Approach to Transport, ST5: Electric Vehicles and Mobility Initiatives promote sustainable travel and transport, including reducing the need to travel.

**6.36** Overall, mixed minor positive and minor negative effects are expected with regards to this SA objective. Uncertainty is associated with this objective, as changing travel patterns (including a permanent increase in home working accelerated by the Covid-19 pandemic), changes in vehicle ownership and a move to more sustainable fuels means that vehicles may be responsible for a much lower proportion of air pollution in future.

### SA objective 14: Energy Efficiency

**6.37** Policies SG1: Creating Sustainable Development specifically requires development to design for enhanced energy efficiency. Policy CC3: Energy Generation also supports proposals for renewable energy, energy storage and heat recovery and Policy CC4: Natural Cooling will also encourage a shift towards greener and more efficient energy use. The other climate change policies may also help to

reduce overall energy demand, by helping to minimize energy use.

**6.38** Overall, significant positive effects are expected for this SA objective.

### SA objective 15: Economy

**6.39** The plan provides for at least 115ha employment land to 2036, including through the allocation of six new employment sites, in addition to identifying Special Policy Areas to support economic activity. The policies in the 'A Strong Local Economy' section of the Local Plan will work together to boost the local and regional economy, as well as providing a sufficient number and variety of employment opportunities for those in the Borough. The plan also supports local training opportunities to help career progression and to build the workforce of tomorrow, such as through promoting training schemes for local people through Policy E10: Providing Local Employment Skills and Opportunities and requiring opportunities for training and apprenticeships at the Special Policy Areas.

**6.40** In addition, the 'Vibrant Town Centres' section of the Local Plan will also help to boost the local economy, by increasing the vibrancy and vitality of town centres, which is expected to increase footfall and spending in Hertsmere's centres. In conjunction with policies to expand and support the film and television industry, namely Policy E6: Rowley Lane Studio Quarter and E8: Promoting the Film and Television Industry, this could also help increase the visitor economy.

**6.41** Overall, significant positive effects are expected for this SA objective.

### In-Combination Effects

**6.42** Development proposed in the Local Plan will not be delivered in isolation from development proposals in other plans and projects covering Hertsmere and the surrounding area. This section outlines the development proposed by plans covering Hertfordshire county as a whole, and the Local Plans of the seven neighbouring authorities, which may combine with the Hertsmere Local Plan to produce in-combination effects. The discussion in this section is focussed on development which is within or in closest proximity to Hertsmere given that this is the development which is most likely to result in any in-combination effects. Each sub-section starts by describing relevant plans and then considers the potential for in-combination effects.

**6.43** There are no nationally significant infrastructure projects proposed for development within Hertsmere or in close proximity to the Borough, therefore there is no potential for in-combination effects to occur in this regard.



## County level plans

**6.44** At the county level, the main planning responsibilities are with respect to minerals, waste, and transport.

### Hertfordshire Minerals Local Plan 2002-2016

**6.45** The Minerals Local Plan (adopted 2007) contains policies for determining mineral extraction planning applications and preferred areas for future sand and gravel extraction. The Minerals Local Plan is supported by the Minerals Consultation Areas in Hertfordshire SPD. The SPD requires that local authorities consult Hertfordshire County Council before determining applications for development in Minerals Consultation Areas. The Council is currently preparing a new Minerals Local Plan and the Proposed Submission version of the plan was consulted upon in January 2019. Once adopted it will replace the 2007 adopted Minerals Local Plan. In addition to determining whether the sites and policies in the adopted plan are still appropriate, there is a need for new plan to consider whether there is a need to identify new potential sites for mineral extraction. While there are Minerals Safeguarding Areas for sand and gravel and brick clay within the Borough, the adopted Minerals Local Plan and the Proposed Submission version of new Minerals Local Plan do not identify any sites for minerals extraction within Hertsmere.

### Hertfordshire Waste Local Plan

**6.46** The Waste Local Plan for Hertfordshire comprises the Waste Core Strategy & Development Management Policies Development Plan Document (DPD) 2011-2026 (adopted 2012) and the Waste Site Allocations DPD 2011-2026 (adopted 2014). These DPDs sets out the spatial vision and strategic objectives for waste planning in Hertfordshire as well as the policies needed to implement these objectives and make decisions on waste planning applications. Sites for waste management facilities are also allocated in the Waste Site Allocations DPD. The sites identified comprise existing strategic sites (which currently perform a waste management function and are therefore safeguarded), newly allocated sites and Employment Land Areas of Search (sites which may be compatible with waste management uses but currently have little immediate potential for redevelopment). Within Hertsmere the sites are limited to one existing strategic site (Redwell Wood Farm between London Colney and South Mimms) and a number of Employment Land Areas of Search, with no newly allocated sites for the Borough included.

**6.47** Similar to the Minerals Local Plan Hertfordshire County Council are also preparing a new Waste Local Plan. The Draft Waste Local Plan was consulted upon in January 2021. This will replace the adopted Waste Local Plan once adopted. The new plan will set the objectives and spatial strategy for waste planning in Hertfordshire up to 2036. Given that the Proposed

Submission Publication version of the Waste Local Plan has not been prepared and the plan is still at a relatively early stage of preparation before submission for examination, it has not formed part of this review.

### Hertfordshire Local Transport Plan

**6.48** Hertfordshire's Local Transport Plan (LTP) 4 2018 – 2031 (adopted 2018) sets out the approach for how transport can help deliver a positive future vision of Hertfordshire. The LTP recognises the wider influence of transport in relation to issues such as economic growth, meeting housing needs, improving public health and reducing environmental damage. The LTP recognises that a continued reliance on high levels of car use will lead to worsening congestion and journey time reliability, with impacts relating to economic growth, public health and the quality of the urban, rural and natural environment. Acknowledging these issues, the LTP seeks to provide stronger support for walking, cycling, passenger transport, and traffic demand management measures where appropriate.

**6.49** The document provides an outline of transport improvements which will be considered further in the Growth and Transport Plans which are presently being prepared for the County. Schemes are identified in relation to key multimodal movement corridors in the County. Those of most relevance to Hertsmere are:

- Corridor 1 (Aylesbury – Watford – London) within which priorities relating to Hertsmere include ensuring the safe and effective operation the M25 corridor and its interchanges.
- Corridor 2 (London – Watford - Luton - Milton Keynes) within which priorities relating to Hertsmere include ensuring the safe and effective operation the M1 and M25 corridor and interchanges and Thameslink programme for extra train capacity, increased frequencies and extension of services.
- Corridor 3 (London – Stevenage – Peterborough) within which priorities relating to Hertsmere include ensuring the safe and effective operation the A1(M) and M25 corridor and interchanges.
- Corridor 5 (London – Stevenage – Peterborough) within which priorities relating to Hertsmere include ensuring the safe and effective operation the A1(M) and M25 corridor and interchanges.

### Potential for in-combination effects with County level plans

**6.50** Given that no sites for minerals extraction are identified within Hertsmere in the adopted Minerals Local Plan or the Proposed Submission version of new Minerals Local Plan there is limited potential for in combination effects with the

effects identified for the Hertsmere Local Plan. The identification of Mineral Safeguarding Areas and Minerals Consultation Areas in the Minerals Plan and the policy guidance provided in the supporting SPD will mean that proposals submitted for non-minerals development that might otherwise sterilise mineral reserves will be required to follow the relevant consultation procedure. Considered in-combination with Policy ENV13: Mineral Consultation Area in the Hertsmere Local Plan, the potential for new development to sterilise mineral resources in the Borough is likely to be limited. The protection of areas of importance for mineral resources through the Minerals Local Plan may mean that minerals necessary for Local Plan development could be sourced locally. This could reduce the need to transport certain materials to the plan area with positive effects expected in relation to SA objectives 9 (Greenhouse Gas Emissions) and 13 (Air Quality). Given that minerals extraction is likely to be supported in the plan area, job creation in this sector is likely to be supported and therefore there is potential for positive effects in relation to SA objective economy 15 (Economy).

**6.51** New development likely as a result of proposals set out in the Hertfordshire Waste Local Plan could result increased land take, construction activities and increased traffic and vehicle movements from workers, deliveries and distribution. The level of development set out in the Hertsmere Local Plan and the construction activities required to achieve this level of growth, has the potential to combine with proposals in the Hertfordshire Waste Local Plan to generate in-combination negative effects within the Hertsmere area. The majority of sites identified for Hertsmere in the Waste Site Allocations DPD are Employment Land Areas of Search where there is limited potential for redevelopment for waste management facilities, meaning the scale of development is likely to be limited. Furthermore, given that these areas are existing employment areas, much of the development may occur on brownfield land and be in less sensitive locations. This point considered, there is still potential for in-combination negative effects in relation to SA objectives 6 (Soil and Minerals), 7 (Historic Environment), 8 (Landscape), 9 (Greenhouse Gas Emissions), 10 (Biodiversity and Geodiversity) and 13 (Air Quality). There is potential for the negative effect identified in relation to SA objective 6 to be combined with a positive effect due to maximising use of brownfield land. There is an existing strategic waste site identified through the Waste Local Plan (Redwell Wood Farm) within the Bowmans Cross New Settlement. The potential for this waste site to have adverse effects on this site in relation to SA objective 5 (Health) has already been considered through the appraisal of the Bowmans Cross New Settlement site. Given that the Waste Local Plan does not identify any newly allocated sites for the Borough, the potential for negative in-combination effects are limited.

**6.52** New road provision as set out in the LTP is likely to have negative effects in relation to SA objectives 6 (Soil and Minerals), 9 (Greenhouse Gas Emissions), and 13 (Air Quality) in particular given land taken required and potential for induced demand to result and increasing numbers of trips being made by private vehicle (sustainable transport improvements may also require some land take, but this is less likely). However, road provision set out in the LTP will also support positive effects in relation to SA objectives 9 (Greenhouse Gas Emissions), and 13 (Air Quality), as they may help to help address congestion in Hertsmere. Effects relating to greenfield land take (i.e. expected in relation to SA objective 6) for new roads are likely to be combined with those expected for the overall level of level of growth set out in Hertsmere through the plan. Similarly, effects relating to greenhouse gas emissions and air quality are likely to be experienced in-combination with the increasing number journeys undertaken in the Borough as new homes and businesses are occupied.

**6.53** The spatial strategy in the Local Plan sets out the highest levels of development at the larger settlements (as well as the Bowmans Cross New Settlement) from which residents are likely to have reduced need to travel given that there is relatively good access to existing and planned services and facilities and jobs from these locations. This, combined with the active and public transport improvements set out in the LTP and those set out in the Local Plan, are likely to have additional positive effects in relation to SA objectives 9 (Greenhouse Gas Emissions), and 13 (Air Quality) given that they would help to reduce congestion and limit vehicle related emissions. They could also encourage more active lifestyle choices among residents with positive effects relating to SA objective 5 (Health).

### Neighbouring authorities' Local Plans and London Plan

**6.54** Hertsmere Borough is adjoined by the neighbouring local authorities of Barnet, Enfield, Harrow, St Albans, Three Rivers, Watford and Welwyn Hatfield. The main development proposed by their respective Local Plans is summarised below. The boroughs of Barnet, Enfield and Harrow fall within the Greater London area and therefore relevant policies of the London Plan may also result in in-combination effects with the Hertsmere Local Plan.

#### Barnet Local Plan

**6.55** The current Barnet Local Plan comprises the Core Strategy (2012) and Development Management Policies document (2012). Area Action Plans for Colindale and Mill Hill East, drafted to respond to both areas being identified through the London Plan (2011) as Opportunity Areas for substantial number of new homes, also form part of the Barnet Local Plan. The Barnet Local Plan sets out the delivery of 28,000

new homes over the plan period 2011/12 to 2025/26. The focus of development over this period is identified as being within the North West London – Luton Coordination Corridor with development areas at Brent Cross – Cricklewood, Colindale and Mill Hill East accommodating the highest levels of development.

**6.56** Barnet Council consulted upon Regulation 19 of its new Local Plan which will cover the period from 2021 to 2036. A minimum of 35,460 new homes are planned for over this time period. The most significant levels of housing growth are planned for at the Growth Areas of Brent Cross Cricklewood Opportunity Area, Brent Cross West, Cricklewood Town Centre, Edgware Town Centre, Colindale Opportunity Area and Mill Hill.

### Enfield Local Plan

**6.57** The current Enfield Local Plan comprises the Core Strategy (2010), Development Management document (2014), Edmonton Leaside Area Action Plan (2020) and North Circular Area Action Plan (2014). Between 2006 and 2026 the Core Strategy provides for the development of 11,000 new homes. Large scale growth is to be focussed within the broad locations of Central Leaside and Enfield in the Upper Lee Valley, the area around the North Circular Road at New Southgate and at Enfield Town. The Edmonton Leaside Area Action Plan recognises the importance of this area as forming part of the London-Stansted-Cambridge growth corridor and within the Upper Lee Valley Opportunity Area.

**6.58** In December 2018, Enfield Council undertook a Regulation 18 consultation on the Issues and Options version of the new Local Plan. An additional period of Regulation 18 consultation was undertaken in June 2021 on the Main Issues and Preferred Approaches of the plan. Given that Regulation 19 consultation has not been undertaken for new plan and it is still at a relatively early stage of preparation before submission for examination, it has not formed part of this review.

### Harrow

**6.59** The current Harrow Local Plan comprises the Harrow Core Strategy (2012), Sites Allocation Document (2013) and Harrow and Wealdstone Area Action Plan (2013). The Core Strategy sets out the delivery of a minimum of 6,050 net additional homes between 2009 and 2026. The Harrow and Wealdstone Intensification Area is to be a focus for regeneration over the plan period. The Harrow and Wealdstone Area Action Plan responds to the identification of this area by the Council and the Mayor for London as priority area for regeneration with at least 2,800 net new homes to be delivered within the area. The Sites Allocation Document allocates sufficient, previously-developed sites to accommodate the development needs of those parts of the

Borough outside of the Harrow and Wealdstone Intensification Area. This includes the allocations of the Royal National Orthopaedic Hospital site close to the south eastern boundary of Hertsmere for 127 homes.

### Three Rivers Local Plan

**6.60** The key components of the Three Rivers Local Plan comprise the Core Strategy (2011), Development Management Policies Local Development Document (2013) and Site Allocations Document (2014). The Core Strategy guides development in the plan up to 2026, setting out to deliver 180 homes per year up to the end of the plan period. Much of the development (15% and 60% of the total housing requirement, respectively) is to be provided at the Principal Town of Rickmansworth and the Key Centres (South Oxhey, Croxley Green, Abbots Langley, Chorleywood, Leavesden and Garston and Mill End). The Development Management Policies and Local Development Document and the Site Allocations Document support the delivery of the Core Strategy. These documents set out the criteria against which all planning applications in the District are to be considered and allocate specific sites to meet needs for housing, employment, education, shopping and open spaces in Three Rivers.

**6.61** Three Rivers District Council is currently preparing a new Local Plan that will guide development within the District up until 2038. Consultation was undertaken on the Regulation 18 Preferred Policy Options and Sites from June 2021. Given that Regulation 19 consultation has not been undertaken for new plan and it is still at a relatively early stage of preparation before submission for examination, it has not formed part of this review.

### St Albans District Local Plan

**6.62** In 2007, a Direction was made saving specific policies of the St Albans District Local Plan Review 1994. The saved policies form the basis for planning decisions in St Albans.

**6.63** St Albans City and District Council is currently preparing evidence to support its drafting of a new Local Plan, with Regulation 18 consultation scheduled to occur in 2022. As the plan is at an early stage of preparation it has not formed part of this review.

### Watford Local Plan

**6.64** The Watford Local Plan currently comprises the Core Strategy (2013) which sets out the strategic policies to guide development up to 2031, alongside policies saved from the Watford District Plan 2000. The core Strategy plans for the development of 6,500 new homes between 2006 and 2031. New development is focussed within the Special Policies Area of Watford Town Centre (a focus for new employment,

shopping and related uses with some residential development), Watford Junction (1,500 homes), Health Campus (500 homes) and Western Gateway (300 homes).

**6.65** The new Watford Local Plan was submitted to the Secretary of State for examination in August 2021. The new Local Plan makes provision for 14,988 new homes between 2018 and 2036, with development focussed in the Core Development Area. The Core Development Area which falls within the developed area of Watford, comprises the subareas of Watford Gateway, the Town Centre and the Colne Valley.

### Welwyn Hatfield District Plan

**6.66** The Welwyn Hatfield District Plan was adopted by Welwyn Hatfield Borough Council in 2005 with the majority of policies in that document saved in 2008.

**6.67** The new Welwyn Hatfield Local Plan was submitted to the Secretary of State for examination in May 2017. The new Local Plan identifies opportunities in and around the towns and villages excluded from the Green Belt to facilitate the delivery of a borough-wide housing target of around 12,000 dwellings, although the Inspector has requested the plan be updated to reflect the updated objectively assessed need of 15,200 dwellings. The primary focus for new development is to be in and around the two towns of Welwyn Garden City and Hatfield, with some growth to be delivered in and around the excluded villages. A new village at Symondshyde to the north-west of Hatfield has also been identified for development.

### London Plan

**6.68** The new London Plan was adopted in 2021 and sets out the spatial development strategy for the Greater London area. As such, planning applications in London will be considered against the new London Plan's policies and those within the individual borough local plans. The plan sets an overall housing target of 520,000 homes for Greater London from 2019/20 to 2028/29. Within the north west of London, ongoing Opportunity Areas are identified for substantial numbers of homes at Colindale/Burnt Oak and Harrow and Waldstone. This area falls within the wider High Speed 2 / Thameslink Growth Corridor within which connections between the Elizabeth line, National Rail services and the newly built High Speed 2 line are to provide opportunities for new development.

### Potential for in-combination effects with Neighbouring authorities' Local Plans

**6.69** Hertsmere is bordered by Greater London at its southern boundary. To the north and north east, the landscape becomes increasingly rural. The western boundary of the Hertsmere Borough sits directly adjacent to the built up area of Watford. Hertsmere is surrounded by mostly undeveloped

land, the most notable exception being to the west towards Watford.

**6.70** The development in all Local Plans (as well as the London Plan), whether adopted or in the process of preparation, provide for both increases in housing supply as well as job creation. In-combination significant positive effects with the Hertsmere Local Plan are likely in relation to SA objective 3 (Housing) and SA Objective 15 (Economy), reflecting the significant amounts of residential and job growth supported across the wider area. Given the increased levels of human activities (such as recreation and increasing travel in the area) associated with this growth through construction, and as housing and businesses are occupied, in-combination negative effects could occur on the built and natural environment; for example, in relation to SA objective 7 (Historic Environment), SA objective 8 (Landscape), SA objective 10 (Biodiversity and Geodiversity).

**6.71** Delivering new development in the surrounding local authority areas is also likely to result in combined effects with the development set out in the Hertsmere Local Plan in relation to the volume of traffic on the road network. This could in turn increase air pollution and carbon emissions. In-combination negative effects may therefore result in relation to SA objective 9 (Greenhouse Gas Emissions) and SA13 (Air Quality). However, the support for sustainable transport set out in the Local Plans and in the London Plan will help to reduce the uptake journeys by car. The delivery of new roads set out in the LTP (see above) could act in-combination to further reduce the potential to achieve high levels of modal shift and help to limit congestion. The delivery of improvements relating to active and public transport will likely encourage higher numbers of residents to make use of these modes of transport.

**6.72** The potential for measures to result in a marked shift towards the use of more sustainable and active modes of transport will be dependent largely on the individual actions of local people, and therefore the in-combination effects on these SA objectives are uncertain to some extent. Development proposed in the each of the respective plans will ensure the delivery of additional services as well as supporting long term investment in infrastructure, meaning that an in-combination minor positive effect is expected in relation to SA objective 2 (Services and Facilities). Given the potential for residents to have reduced need to travel as a result of this, these provisions could also help to limit any increase in air pollution and greenhouse gas emissions associated with new development and travel in the plan area.

**6.73** Effects relating to SA objective 5 (Health) are likely to be mixed. Delivering new homes which are built to a high standard (including those that are suitable for older people and people with disabilities) through the Hertsmere Local Plan



and plans in the surrounding areas are likely to result in in-combination positive effects. The support these plans provide for the delivery of supporting infrastructure (including healthcare, community services and facilities and open space) will strengthened the positive effect expected. However, new development in proximity to existing residential development is also likely cause temporary adverse effects in relation to health as a result of construction disturbance. There is also potential for increased noise, light and air pollution resulting from increased traffic associated new development, particularly given the presence of important transport routes through Hertsmere including the M1, M25 and A1. Increasing populations within Hertsmere and the surrounding local authority areas could increase demand for rail services. Whilst this has potential to cause capacity issues on existing services, it could also result in increased numbers of services along the Midland Line and East Coast Main Lines, through Hertsmere. While this could also result in additional noise and light pollution which could affect the health of residents in Hertsmere, uncertainty is attached given that the potential for increased numbers of services is presently unknown.

**6.74** The construction required in Hertsmere and the surrounding areas has the potential to result in increased contamination of water bodies. There is also potential for increased urban run-off as the area of impermeable surfaces increases. As such potential in-combination negative effects may occur in relation to SA objectives 11 (Water Quality) and 12 (Flood Risk). However, these issues will be addressed onsite through the preparation of Construction Environmental Management Plans and in relation to the wider catchment areas through Water Resource Management Plans. The inclusion of policies in the Local Plans and London Plan requiring development to be designed to avoid and reduce the risk of flooding will also of importance to address these issues.

**6.75** Many of the identified potential in-combination effects are likely where settlements directly abut or are in very close proximity to Hertsmere Borough. This is most notably the case at Watford to the west and to a lesser extent at London Colney to the north and parts of Barnet to the south east. While there is development planned for South Oxhey in Three Rivers District, which is relatively close to Hertsmere, the area of undeveloped Green Belt land between this settlement and Bushey will act to limit the potential for in-combination effects. The existing developed area of Watford town is to be the focus of much of the development within that local authority and there is potential for many of the in-combination effects identified in the preceding paragraphs to result through these elements of growth. This is most notably the case in relation to SA objectives 2 (Services and Facilities), 3 (Housing), 5 (Health), 7 (Historic Environment), 10 (Biodiversity and Geodiversity), 11 (Water Quality), 12 (Flood Risk) and 15 (Economy). The development to be delivered in the presently

developed area of Watford is considered less likely to result in in-combination negative effects in relation to SA objective 8 (Landscape) given the more developed nature of the town.

**6.76** There is potential for development in Hertsmere at the Bowmans Cross New Settlement to act in-combination with development at London Colney to diminish the existing gap between that settlement and development to the south with implications for landscape character in the surrounding area. However, Policy H10 of the Hertsmere Local Plan, which allocates the Bowmans Cross New Settlement, requires the creation of a new defensible green belt boundary at the site to maintain separation between neighbouring settlements. It is expected that this requirement would help to limit the potential for an in-combination negative effect in relation to SA objective 8 (Landscape).

**6.77** The presence of the Green Belt designation adjacent to the Borough boundary in many directions means there is reduced potential for in-combination effects. Planning policy will require that the five purposes of Green Belt (to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land) are protected as any new development occurs, limiting the potential for significant impacts resulting from new development. This point considered, Local Plans have allocated some development sites within the Green Belt in close proximity to Hertsmere. This includes at Trent Park University Campus Major Developed Site (Enfield) and Royal National Orthopaedic Hospital Local Plan Site Allocation (Harrow). The most significant areas for the development in closest proximity to Hertsmere include the Harrow and Wealdstone (Harrow) and Colindale (Barnet) Opportunity Areas. However, these areas are located sufficiently away from Hertsmere's boundaries with relatively high levels of intervening existing development as to rule out the potential for additional in-combination effects.

## Mitigation and Recommendations

**6.78** When taking into account the plan as a whole, negative effects are identified with regards to the following SA objectives:

- SA objective 5: Health.
- SA objective 6: Soil and Minerals.
- SA objective 8: Landscape.
- SA objective 9: Greenhouse Gas Emissions.
- SA objective 10: Biodiversity and Geodiversity.

- SA objective 13: Air quality.

**6.79** Although some of the potential mitigation measures identified below are similar to those discussed when considering site options in **Chapter 4**, this section sets out proposed mitigation and recommendations for the Local Plan as a whole.

**6.80** With regards to SA objective 5, the plan could ensure that sufficient planting buffers are used to minimise adverse effects of air and noise pollution on workers at employment sites, particularly where these are located close to busy roads. It is also recommended that Hertsmere Borough Council liaises with Hertfordshire County Council to ensure there is sufficient capacity and distribution of healthcare facilities. Where it is not possible to provide sufficient healthcare facilities in proximity to development, the Council should ensure such facilities can be accessed via safe, frequent and affordable sustainable modes of transport.

**6.81** With regards to SA objective 10, the Local Plan could set out how effects on particular assets should be addressed, particularly where significant negative effects are identified in the site appraisals. In addition, it is recommended that the Local Plan sets out the approach Hertsmere Borough Council will take to Ecosites, particularly given the uncertainty regarding the wider biodiversity value of these sites.

**6.82** It is considered that it is not possible to mitigate the adverse effects identified for SA objectives 6, 9 and 13 further than the plan already does. However, this does not mean that the Hertsmere Local Plan is unsuitable. It simply recognises that there are some impacts that strategic levels of development will have that cannot be fully mitigated. Residual adverse effects are expected to be minor.

**6.83** A number of additional recommendations to help maximise the sustainability of the Local Plan are set out below. It may not be appropriate to address all of these within the Local Plan itself, as they may require working with bodies outside the Council or only possible to implement at the planning application stage.

- Where services and facilities are not and cannot be provided or extended locally, HBC should ensure good access to services and facilities elsewhere via sustainable modes of transport.
- With regards to Bowmans Cross New Settlement, Policy H10 could specify provision for community halls and could also require that the vision document and phasing plan ensure a sense of community is integrated from the start.
- With regards to Bowman's Cross New Settlement under Policy H10 should require specific mitigation for effects

on designated heritage assets and their settings, reflecting the requirements set out for other sites.

- While Policy H10 relates to housing, it would be helpful for the box for Bowman's Cross New Settlement under Policy H10 to acknowledge that the New Settlement will also provide employment land.
- There are some concerns regarding the effects of existing noise and air pollution at some proposed employment sites. While employment is a less sensitive use, it is recommended the plan provides mitigation for these. This particularly relates to employment sites alongside major roads, such as South Mimms Services.
- It is recommended that Policy E4 (South Mimms Special Policy Area) specifically sets out how the loss of the Ecosite and potential effects on the adjacent Local Wildlife Site will be addressed.
- Policy ENV3: Biodiversity Strategy could be strengthened by including the biodiversity net gain target of at least 10% in the policy text, rather than supporting text. In addition, it should make clear this is a minimum and it is also recommended that the requirement to use the Defra metric is included in the policy itself.
- For site HEL216: Land west of Potters Bar station, it is recommended that the site-specific requirements include a requirement to avoid development in the small area of the site that lies within flood zone 3.
- It is recommended that Policy E4: South Mimms Motorway Services Area - Special Policy Area specifically addresses potential impacts on the historic environment.

## Chapter 7

### Monitoring

**7.1** This chapter recommends indicators to monitor the effects of implementing the Local Plan.

**7.2** The SEA Regulations require that "the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action" and that the environmental report should provide information on "a description of the measures envisaged concerning monitoring". Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.

**7.3** Although national Planning Practice Guidance states that monitoring should be focused on the significant environmental effects of implementing the Local Plan, the reason for this is to enable local planning authorities to identify unforeseen adverse effects at an early stage and to enable appropriate remedial actions. Since effects which the SA expects to be minor may become significant and vice versa, monitoring measures have been proposed in this SA Report in relation to all of the SA objectives in the SA Framework. As the Local Plan Review is implemented and the likely significant effects become more certain, the Council may wish to narrow down the monitoring framework to focus on those effects of the Local Plan Review likely to be significantly adverse.

**7.4** A number of suggested indicators for monitoring the potential sustainability effects of implementing the Local Plan are set out in **Table 7.1**. The data used for monitoring in many cases will be provided by outside bodies, for example the Environment Agency. It is therefore recommended that the Council remains in dialogue with statutory environmental consultees and other stakeholders and works with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.

**Table 7.1: Proposed monitoring framework**

SA objectives	Proposed Monitoring Indicators
SA Objective 1: Education	<ul style="list-style-type: none"> <li>■ Value of developer contributions towards education facilities</li> <li>■ Number of planning applications for educational facilities</li> </ul>
SA Objective 2: services and facilities	<ul style="list-style-type: none"> <li>■ Value of developer contributions towards local services and facilities</li> <li>■ The number of local services and facilities lost through the development process</li> <li>■ Percentage of completed residential development within that falls within an area of very high or high accessibility</li> </ul>
SA Objective 3: Housing	<ul style="list-style-type: none"> <li>■ Maintenance of a five year supply of deliverable sites</li> <li>■ Number of affordable housing completions</li> <li>■ Provision of adequate dwelling mix within affordable housing completions</li> <li>■ Number of Gypsy and Traveller pitches provided on authorised sites</li> <li>■ Mix of type and tenure of housing completions</li> <li>■ Average property sale price</li> <li>■ Hertsmere property price/income ratio</li> </ul>
SA Objective 4: Community cohesion	<ul style="list-style-type: none"> <li>■ Number of community facilities lost through the development process</li> <li>■ Number of planning applications for faith use buildings</li> <li>■ Total hectares of open space</li> <li>■ Number/percentage of LSOAs among the 20% most deprived in England and Hertfordshire</li> <li>■ Number of recorded offences per 1000 population</li> <li>■ Number of noise complaints</li> </ul>
SA Objective 5: Health	<ul style="list-style-type: none"> <li>■ Number of applications for healthcare uses</li> <li>■ Total hectares of open space</li> </ul>
SA Objective 6: Soil and minerals	<ul style="list-style-type: none"> <li>■ Percentage of new homes on previously developed land (PDL)</li> <li>■ Percentage of development on Grade 1 or 2 agricultural land</li> <li>■ Percentage of development within Mineral Consultation Areas (MCAs)</li> </ul>
SA Objective 7: Historic environment	<ul style="list-style-type: none"> <li>■ Percentage of historic buildings identified as 'at risk'</li> <li>■ Number of listed buildings</li> <li>■ Number of Conservation Area appraisals updated</li> <li>■ Percentage of permissions granted contrary to Hertfordshire County Council advice</li> <li>■ Number of Locally Important Buildings</li> <li>■ Number of Registered Parks and Gardens</li> <li>■ Number of Sites of Archaeological Interest</li> </ul>
SA Objective 8: Landscape	<ul style="list-style-type: none"> <li>■ Condition of landscape character areas</li> <li>■ Number of trees subject to Preservation Orders felled or damaged</li> <li>■ Number of Design Statements produced</li> <li>■ Number of permissions granted outside of settlement limits</li> </ul>
SA Objective 9: Greenhouse gas emissions	<ul style="list-style-type: none"> <li>■ Average car parking provision approved on residential schemes</li> <li>■ Total emissions of CO<sub>2</sub></li> <li>■ Carbon emissions by sector (Industrial &amp; Commercial, Domestic and Road) and per capita</li> <li>■ Percentage of approved major commercial developments with a Travel Plan and cycle measures</li> <li>■ Total length of public rights of way</li> <li>■ Percentage of journeys made by cycling and walking.</li> <li>■ Percentage of journeys made by public transport Percentage of completed residential development within walking distance of three or more sustainable transport links</li> <li>■ Proportion of households with two or more cars</li> </ul>

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SA objectives	Proposed Monitoring Indicators
SA Objective 10: Biodiversity and geodiversity	<ul style="list-style-type: none"> <li>■ SSSI condition</li> <li>■ Total hectares of green space</li> <li>■ Number/area of designated biodiversity and geodiversity sites</li> <li>■ Number of trees subject to Preservation Orders felled or damaged</li> <li>■ Number of new or resurveyed TPOs</li> <li>■ Percentage of permissions granted contrary to Natural England advice</li> </ul>
SA Objective 11: Water quality and quantity	<ul style="list-style-type: none"> <li>■ Permissions granted contrary to advice of the Environment Agency on flooding and water quality grounds</li> <li>■ Percentage of water bodies in Borough that meet good ecological and chemical status</li> <li>■ Amount of Ancient Woodland in Borough</li> </ul>
SA Objective 12: Flooding	<ul style="list-style-type: none"> <li>■ Percentage of new development located in Flood Zone 3a, 3b and 2</li> <li>■ Number of new developments incorporating SuDS</li> </ul>
SA Objective 13: Air quality	<ul style="list-style-type: none"> <li>■ Average car parking provision approved on residential schemes</li> <li>■ Percentage of approved major commercial developments with a Travel Plan and cycle measures</li> <li>■ Percentage of journeys made by cycling and walking.</li> <li>■ Percentage of journeys made by public transport</li> <li>■ Percentage of completed residential development within walking distance of 3 or more sustainable transport links</li> <li>■ Number of AQMA's in District</li> <li>■ Proportion of households with two or more cars</li> <li>■</li> </ul>
SA Objective 14: Energy efficiency	<ul style="list-style-type: none"> <li>■ Number of District Heating networks in the Borough</li> <li>■ Number of permissions for renewable energy installations</li> <li>■ Number of new developments achieving BREEAM excellent rating</li> <li>■ Number of permissions for renewable energy installations</li> </ul>
SA Objective 15: Economy	<ul style="list-style-type: none"> <li>■ Hertsmere overall average earnings</li> <li>■ Total number of jobs in Borough</li> <li>■ Number/percentage of LSOAs among the 20% most deprived in England and Hertfordshire</li> <li>■ Hectares of employment land provided</li> <li>■ Hectares of employment land lost</li> <li>■ Percentage of non B class uses within designated employment areas</li> <li>■ Total units and vacancy rates of retail and commercial units in main town centres</li> <li>■ Total units and vacancy rates of retail and commercial units in local centres and parades</li> <li>■ Number of business use permissions granted in town centre locations</li> <li>■ Number of business use permissions granted in rural locations</li> <li>■ Number of retail units converted to other uses</li> </ul>

## Chapter 8

### Conclusions

**8.1** The Draft Local Plan (September 2021) and the reasonable alternatives identified in preparing this plan have been subject to an appraisal against the SA objectives, which were developed at the scoping stage of the SA process and refined following subsequent consultations.

**8.2** When considered as a whole, the Local Plan is expected to have positive effects for all SA objectives. These positive effects are expected to be significant for SA 1: education, SA 2: services, SA 3: housing provision, SA 5: health, SA 9: greenhouse gas emissions, SA 10: biodiversity and geodiversity, SA 14: energy efficiency and SA 15: economy. For SA 5: health, SA 6: soil and minerals, SA 8: landscape, SA 9: greenhouse gas emissions, SA 10: biodiversity and geodiversity and SA 13: air quality, the positive effects identified are mixed with minor negative effects. The HRA was unable to conclude that the Draft Local Plan will have no adverse effects on the integrity of any European sites with regards to air pollution. Further traffic data is required to enable further consideration of this issue at the next stage of plan making.

**8.3** The sustainability effects of the Local Plan are particularly influenced by the proposed new settlement at Bowmans Cross, which will provide a substantial amount of housing in the plan period and beyond. This new settlement must be carefully planned and phased to ensure supporting infrastructure is available concurrently with new homes, that design is attractive and sustainable and that a sense of community is fostered from the start. The Local Plan is also likely to boost the economy and attractiveness of Elstree and Borehamwood, by regenerating the Elstree Way Corridor and particularly through provision of the new Media Quarter.

**8.4** The Draft Local Plan includes a number of strategic and development management-style policies to guide future development in the Borough. These policies are expected to go a long way to mitigating adverse effects identified in terms of site allocations and many are likely to result in overall enhancement of Hertsmere's sustainability credentials.

#### Next Steps

**8.5** This SA Report will be available for consultation from 11<sup>th</sup> October 2021 for a period of six weeks. Following this consultation, the responses will be reviewed and addressed.

**8.6** The findings of the SA and the outcomes of the consultation will be taken into account by the Council as it prepares the next iteration of the Local Plan. The SA will then be updated to reflect that version of the Local Plan and further consideration will be given to potential mitigation measures as well as the approach to monitoring the likely significant effects of the plan.

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September 2021

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