



Three Rivers District
Local Plan Regulation 18
Preferred Policy Options and Sites for
Potential Allocation

Interim Sustainability Appraisal Report
June 2021

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1 Introduction

1.1 Background

Three Rivers District Council (TRDC) are preparing a single Local Plan which will replace the Core Strategy (adopted on 17th October 2011), the Development Management Policies Local Development Document (adopted on 26th July 2013) and the Site Allocations Local Development Document (adopted on 25th November 2014). The Core Strategy was developed and adopted prior to the introduction of the National Planning Policy Framework (NPPF) and the update will therefore need to take account of the new policy landscape introduced by the NPPF in March 2012 and subsequently updated in 2018.

The new Local Plan will incorporate strategic policies, development management policies and site allocations into a single document.

During its preparation this Local Plan must be subject to both Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) under the 'Planning and Compulsory Purchase Act' (2004) and 'The Environmental Assessment of Plans and Programmes Regulations' (2004)¹ respectively. Independent consultants TRL Ltd have been appointed by Three Rivers District Council to undertake SA and Strategic Environmental Assessment SEA in support of the new Local Plan.

Both the SA and the SEA processes help planning authorities to fulfil the objective of contributing to the achievement of sustainable development in preparing their plans through a structured assessment of the Plan against key sustainability issues. Hereinafter in this report this combined process will be referred to as 'SA'.

Independent consultants TRL Ltd have been appointed by the Council to undertake Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) in support of the new Local Plan.

This Interim Sustainability Appraisal Report has been produced to accompany the Regulation 18 Local Plan Consultation in order to provide an assessment of the likely environmental, social and economic effects of the various options being considered.

1.2 Purpose of the Interim SA Report

This Interim Sustainability Appraisal Report has been produced in order to provide an assessment of the environmental, social and economic effects that would be likely to result from the implementation of strategies, policies and sites included in the Local Plan Regulation 18 Preferred Policy Options and Sites for Potential Allocation, along with the consideration of wider cumulative effects associated with the Plan as a whole.

The report also provides information on the range of options which have been considered during the development of the Local Plan to the Regulation 18 stage, through the development leading up to the Issues and Options consultation in summer 2017 and then subsequently up to this second Regulation 18 stage².

¹ This regulation implements European Directive 2001/42/EC, known as the Strategic Environmental Assessment (SEA) Directive

² Regulation 18 of the Local Plan Regulations (England) 2004 (As Amended)

The Interim Sustainability Report builds on the SA work previously undertaken through the consultation on a Scoping Report in May 2017, and subsequent update, and through the SA of the Local Plan Issues and Options (July 2017).

1.3 Structure of the Interim SA Report

This Interim SA Report is structured as follows:

- Section 1 provides an introduction to the SA process and to this report and describes how the SA meets regulatory requirements. It also provides a brief summary of the Habitats Regulations Assessment (HRA) process;
- Section 2 provides an outline of the contents and main objectives of the Local Plan;
- Section 3 provides details on the scope and approach to the SA, including the methodology and details of consultation undertaken to date;
- Section 4 provides information relating to the scoping stage and provides a summary of the key sustainability issues based on the baseline research and the framework of SA objectives that are proposed for the assessment stage of the SA. It also includes analysis of the compatibility between the SA objectives and the Local Plan objectives;
- Section 5 provides details the different stages that have been undertaken during the development of the Local Plan and the accompanying SA and describes how options/alternatives have been considered when developing the Regulation 18 Local Plan;
- Section 6 provides details of the findings of the assessment of the Regulation 18 Local Plan;
- Section 7 provides a brief conclusion and details on the next steps for the SA.

Appendices are contained within a separate volume, as follows:

- Appendix A: provides details of the SA related consultation responses received to date;
- Appendix B: provides an update to the information provided in the 2017 Scoping Report;
- Appendix C: provides the full Sustainability Appraisal Framework;
- Appendix D: provides details on the assessment of options/alternatives;
- Appendix E: provides the detailed findings of the SA assessment process for the Proposed Policy Options in the Regulation 18 Local Plan;
- Appendix F: provides details of the assessments for sites proposed for allocation in the Regulation 18 Local Plan;
- Appendix G: provides details of the assessments for sites not to be taken forward for allocation in the Regulation 18 Local Plan.
- A Non-Technical Summary (NTS) has also been prepared as a separate document.

1.4 The SA Process

The process for undertaking the SA for Local Plans is summarised in Figure 1-1, with Table 1-1 providing the details as to how this process has been, and will be, undertaken in relation to the Three Rivers Local Plan.

1.4.1 *Stage A – Scoping*

During Stage A of the process a scoping exercise was undertaken in order to identify the key issues and opportunities within the District, which can then inform the development of the new Local Plan, and to develop the SA methodology for undertaking the assessment of the Plan. A Scoping Report was then prepared and published for consultation from 12th May to 16th June 2017.

The Scoping Report provided information relating to the current Environmental and Sustainability Context for the District as well as providing an indication of the likely evolution of the baseline without the Plan. From the issues identified a draft framework of SA Objectives was prepared. The purpose of the SA Framework is to provide a way in which the effects of the Plan can be described, analysed, and compared. The SA Framework, which was originally developed in 2006, formed the ‘starting point’ for the SA Framework for the new Local Plan

Following the consultation, the Scoping Report was updated to take on-board comments received. The Scoping Report Update (July 2017) provided a summary of the consultation responses received along with an explanation of how each comment had been taken into account.

Given the length of time between the Scoping Report Update and the production of this Interim SA Report it has been necessary to provide further updates to the scoping information. This update is provided as Appendix B to this report.

1.4.2 *Stage B – Developing and refining alternatives and assessing effects*

Stage B of the SA process involves feeding in to the development of the Local Plan during the Regulation 18 stage, through the consideration and assessment of Local Plan options and finally preparing an SA Report for the Regulation 19 consultation (see Section 1.4.3).

The development and refinement of options, and the evaluation of their likely effects is a process which can have more than one iteration, and this has been the case for the development of the Three Rivers Local Plan – as described below.

1.4.2.1 *Issues and Options July 2017*

An SA Working Note was prepared to accompany the Regulation 18 consultation on the Local Plan Issues and Options document in July 2017. That Working Note provided the following information relating to the SA of the Issues and Options:

- A compatibility assessment of the proposed Vision and Objectives for the Local Plan against the SA Objectives;
- An assessment against each of the SA Objectives for the options identified by the Council covering the topics of: Housing Need; Housing Distribution; Affordable Housing; Employment; Transport; and Sustainability and Climate Change.

Further details are provided in Section 5.2.1.

1.4.2.2 *Call for Sites Consultation October 2018*

In autumn 2018 Three Rivers DC undertook a consultation on Potential Sites for Development. This was supported by an SA Working Note which provided an assessment for each of the sites being considered.

Further details are provided in Section 5.3.2.

1.4.2.3 *Preferred Policy Options and Sites for Potential Allocation June 2021 (this stage)*

Since the Issues and Options consultation the Council have been undertaking further development of the Local Plan, including that for the Local Plan strategy, policies and potential site allocations. This new round of planning has taken into consideration; views arising from previous public consultation; National planning policy requirements and other plans and strategies affecting the area, as well as the Government's principles of sustainable development; the long-term priorities for Three Rivers as defined by local people and main service providers in the area; and information provided by research and technical studies (the Evidence Base) that the Council has compiled in order to understand the needs of the area and opportunities and constraints that exist.

This process has involved the rigorous testing of options and alternatives primarily through the sustainability appraisal process, taking into account environmental, social and economic impacts of choices.

A second Regulation 18 consultation is being undertaken to provide an opportunity for the local community, other stakeholders and developers to provide feedback on the emerging approach Local Plan before the Publication of the Local Plan at the Regulation 19 stage.

This Interim SA Report has been prepared to accompany this new stage of consultation. It provides an assessment of the likely effects of implementing the Preferred Policy Options and Sites for Potential Allocation as well as providing information on the options which have been considered during this latest round of plan making.

1.4.3 *Stage C – Preparing the SA Report (a future stage)*

The SA Report will be prepared alongside the preparation and publication of the Pre-Submission Local Plan at the Regulation 19 stage. This is currently planned for November/December 2021. The SA Report will fully meet the requirements of Schedule 2 of the SEA Regulations – which relates to the requirements for what must be included in an Environmental Report.

1.4.4 *Stage D – Consultation and Examination (a future stage)*

Following the Pre-Submission consultation the Local Plan will be submitted to the Secretary of State for Examination. If necessary an SA Report Addendum will be produced to reflect any minor changes to the Plan. The Submission is planned for August/September 2022 with Examination anticipated in Late 2022/Early 2023.

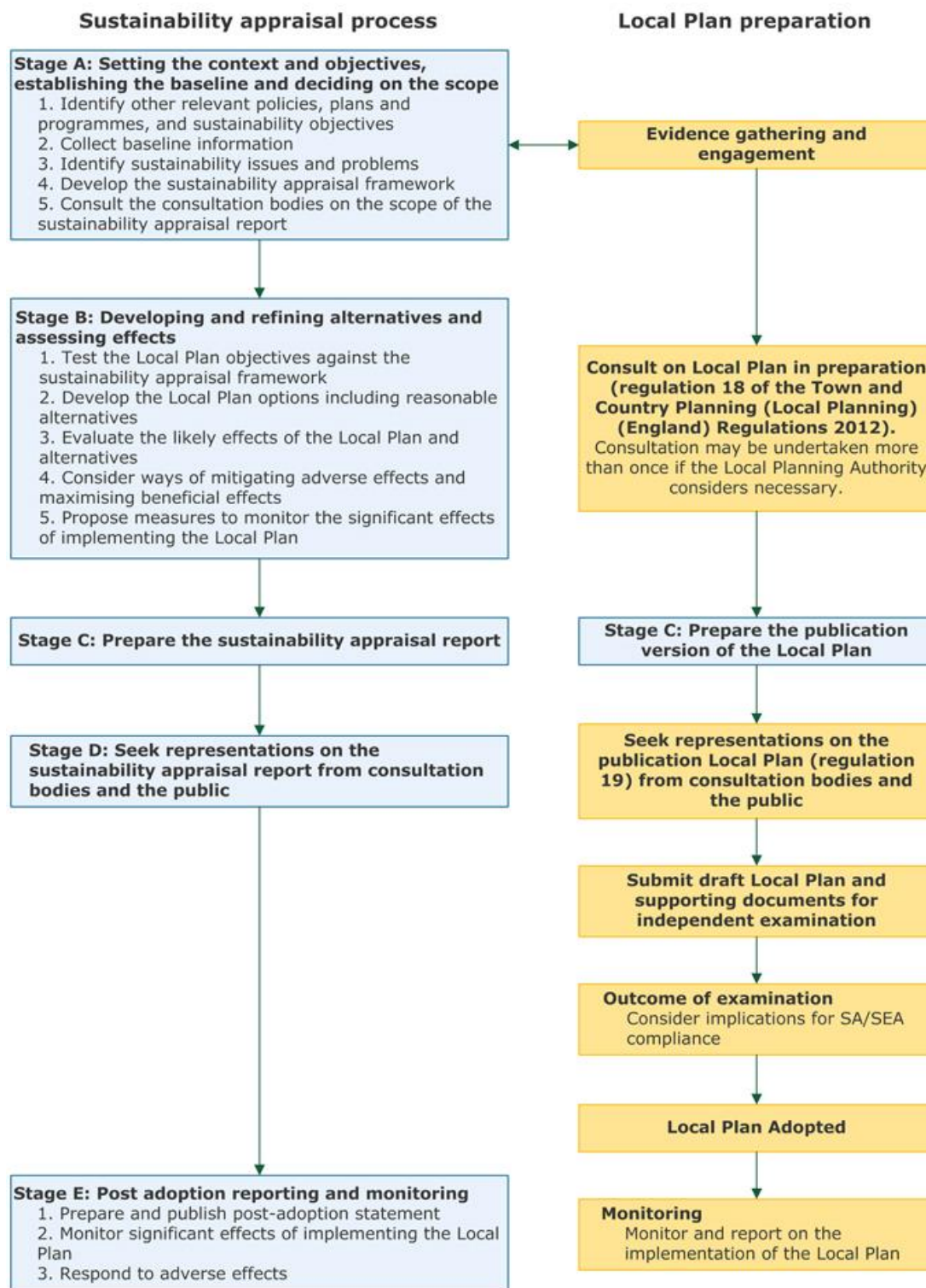
1.4.5 *Stage E – Adoption (a future stage)*

When the Local Plan is adopted (anticipated for Summer 2023) it will be accompanied by an SA Adoption Statement. In line with the SEA Regulations, the SA Adoption Statement will provide the following information:

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

Figure 1-1: Relationships between Local Plan preparation and SA processes

(Source: Planning Practice Guidance, 2016)



The key stages of the SA and Local Plan preparation processes are summarised in Table 1-1.

Table 1-1: Stages in the SA and Three Rivers Local Plan

Local Plan	SA Stages	SA documents/outputs and Dates
Begin document preparation	<p>Stage A: Setting the context, establishing the baseline and deciding on the scope.</p> <p>A1: Identify other relevant policies, plans and document programmes, and sustainability objectives.</p> <p>A2: Collecting baseline information.</p> <p>A3: Identifying sustainability issues and problems.</p> <p>A4: Developing the SA framework.</p> <p>A5: Consulting on the scope of the SA (Scoping Report).</p>	<p>SA Scoping Report, prepared May 2017.</p> <p>Consultation on Scoping Report, May-June 2017.</p> <p>SA Scoping Report Update, July 2017.</p>
<p>Regulation 18 Local Plan Issues and Options consultation. July 2017.</p> <p>Ongoing development of New Local Plan</p> <p>Consultation on the Local Plan 'Potential Sites for Consultation', October 2018.</p> <p>Consultation on Regulation 18 Local Plan, November 2020.</p>	<p>Stage B: Developing and refining options and assessing of effects.</p> <p>B1: Testing the Local Plan objectives against the SA framework.</p> <p>B2: Developing the Local Plan options including reasonable alternatives.</p> <p>B3: Evaluate the likely effects of the Local Plan and alternatives.</p> <p>B4: Considering ways of mitigating adverse effects and maximising beneficial effects.</p> <p>B5: Proposing measures to monitor the significant effects of implementing the Local Plan.</p>	<p>Preparation of SA Working Note on Issues & Options¹, July 2017.</p> <p>Preparation of SA Working Note on Potential Sites for Consultation, October 2018.</p> <p>Update to SA Working Note on Potential Sites for Consultation, July 2019.</p> <p>Preparation of Interim SA Working Report for Regulation 18 Local Plan, June 2021 (this report).</p> <p>Consultation on Regulation 18 Local Plan and accompanying Interim SA Report, June 2021.</p>
Regulation 19 of Publication Local Plan (planned for Nov/Dec 2021)	<p>Stage C: Preparing the Sustainability Appraisal Report.</p> <p>C1: Preparing the SA Report.</p>	SA Report (planned for Nov/Dec 2021)
Submission of Local Plan to Secretary of State (planned for Aug/Sept 2022)	<p>Stage D: Seek representations on the SA Report from consultation bodies and the public</p>	
Examination (planned for late 2022/early 2023)	<p>Consultation on any major modifications arising from the Examination (if required)</p>	
Adoption of the Local Plan (planned for summer 2023)	<p>Stage E: Post adoption reporting and monitoring</p> <p>E1: Prepare and publish post-adoption statement</p> <p>E2: Monitor significant effects of implementing the Local Plan.</p> <p>E2: Responding to adverse effects.</p>	To be completed when the Local Plan is adopted.

¹ This output is not required by the SEA Regulations but was produced to assist in selecting the preferred options.

1.5 Habitats Regulations Assessment

The Council is required by legislation to undertake a Habitats Regulations Assessment (HRA) on the Local Plan, in order to determine whether there may be 'likely significant effects' on European Sites of importance for nature conservation from the Local Plan, either alone or in combination with other plans or projects.

Within Three Rivers there are no European Sites, however the HRA needs to also consider the potential for effects on European sites in neighbouring areas, the closest such site being the Burnham Beeches Special Area for Conservation (SAC), which lies within 8km of the District.

Whilst the HRA for the previous plan did not identify any significant issues for European sites, for this new round of Local Plan development a new HRA will need to be undertaken in order to determine whether this remains the case. The new HRA will be informed by the previous HRA undertaken for the Core Strategy.

The HRA will be undertaken as a separate process to the SA, and reported separately. However there are links between the two assessments and one will inform the other.

2 The Local Plan

2.1 Introduction

The Preferred Policy Options and Sites for Potential Allocation sets out the planning policies and proposals for accommodating growth across Three Rivers for the period 2018 - 2038, the level of growth being significantly higher than that under the current Core Strategy.

The Regulation 18 Local Plan contains a range of 'component parts' which are outlined in the following sub-sections.

2.2 Local Plan Preferred Policy Options (Part 1)

The contents of the Regulation 18 Local Plan Part 1 are summarised below.

2.2.1 *Local Plan Vision and Objectives*

As part of the new Local Plan process, Three Rivers District Council has drafted a new Vision and Objectives for the new Local Plan. The Vision forms the critical starting point for the new Local Plan. It encompasses the aims and aspirations for the District up to the end of the plan period, whilst the strategic objectives set out how the Vision should be achieved.

The draft Vision and Objectives of the emerging Local Plan have been informed by the existing Core Strategy and existing/emerging evidence from various studies and high level strategies. The Vision and Objectives will be refined as options are developed and feedback is received from consultation representations.

The Vision for Three Rivers and the Strategic Objectives that will need to be achieved, in the context of the Local Plan, in order to deliver the Vision are as follows:

Vision for Three Rivers

“Three Rivers will be recognised as a highly desirable, prosperous and outward-looking District where people want, and are able, to live and work.

We will endeavour to protect the character of the area, whilst delivering the high quality homes, jobs and infrastructure that will provide access to good services and facilities for all.”

Strategic Objectives

- 1. Provide for a range of high quality new homes within the District to meet objectively assessed needs and increase the provision of affordable housing.*
- 2. Secure economic prosperity within the District by providing a network of employment allocations that continues to meet the current and future needs of businesses.*
- 3. Ensure that new development prioritises and makes best use of previously developed brownfield land (PDL)*
- 4. Ensure that necessary infrastructure and services are integrated within new developments where appropriate.*
- 5. Support the viability, vitality and variety of shops and services within the District’s main settlements and villages.*
- 6. Encourage active modes of travel and enable the integration of sustainable transport within new developments.*

7. *Reduce the need to travel by locating development in sustainable and accessible locations.*
8. *To conserve and enhance the historic environment and resist the loss of, or damage to, heritage assets.*
9. *Continue to tackle climate change and reduce the impacts on the environment by encouraging reductions in carbon emissions, waste, pollution, energy and water consumption and promoting the use of renewable energy and sustainable building materials.*
10. *Provide opportunities for leisure, arts, sport and recreational activities within the District.*
11. *Provide a coherent network of Green Infrastructure that will continue to support the natural environment along with human health and wellbeing.*
12. *To conserve and enhance the corridors of the Rivers Chess, Colne and Gade and the Grand Union Canal.*
13. *Promote safety and security as a high priority in the design of new developments, in order to create attractive and safe places in which to live and work.*
14. *Meet the demands of an ageing population whilst ensuring the District remains attractive and accessible to younger people.*
15. *Health and Wellbeing.*

2.2.2 ***Sustainable Development***

- Preferred Policy Option 1: Overarching Policy on Sustainable Development
- Preferred Policy Option 2: Housing Mix and Type
- Preferred Policy Option 3: Housing Density
- Preferred Policy Option 4: Affordable Housing
- Preferred Policy Option 5: Provision for Gypsies, Travellers and Travelling Showpeople
- Preferred Policy Option 6: Residential Design and Layout and Accessible and Adaptable Buildings

It should be noted that whilst this section of the Regulation 18 Local Plan does not include specific preferred policy options in relation to the spatial strategy (i.e. distribution of development) or the level of housing growth to be required, these two issues are both discussed in the supporting text of the document (in Section 2 Background and Context). For completeness the SA has provided assessments of these two topic areas, under the following headings:

- ‘Potential Housing Distribution’; and
- ‘Housing Growth Level’.

2.2.3 ***Employment***

- Preferred Policy Option 7: Employment and Economic Development
- Preferred Policy Option 8: Warner Bros. Studios at Leavesden
- Preferred Policy Option 9: Retail and Leisure

2.2.4 ***Social and Community Facilities/Health and Wellbeing***

- Preferred Policy Option 10: Social and Community Facilities
- Preferred Policy Option 11: Health and Wellbeing

2.2.5 *Climate Change*

- Preferred Policy Option 12: Carbon Dioxide Emissions and On-site Renewable Energy
- Preferred Policy Option 13: Adapting to Climate Change and Sustainable Construction
- Preferred Policy Option 14: Renewable and Low Carbon Energy Developments
- Preferred Policy Option 15: Flood Risk and Water Resources

2.2.6 *Green Belt*

- Preferred Policy Option 16: Green Belt

2.2.7 *Environment*

- Preferred Policy Option 17: Ground Conditions, Contamination and Pollution
- Preferred Policy Option 18: Waste Management and Recycling

2.2.8 *Green infrastructure*

- Preferred Policy Option 19: Green and Blue Infrastructure
- Preferred Policy Option 20: Landscape Character
- Preferred Policy Option 21: Biodiversity, Trees, Woodlands and Landscaping
- Preferred Policy Option 22: Open Space, Play Space, Sport and Recreation

2.2.9 *Design and Heritage*

- Preferred Policy Option 23: Local Distinctiveness and Place Shaping
- Preferred Policy Option 24: Advertisements
- Preferred Policy Option 25: Heritage and the Historic Environment

2.2.10 *Transport and Connections*

- Preferred Policy Option 26: Sustainable Transport and Travel
- Preferred Policy Option 27: Parking
- Preferred Policy Option 28: Deliveries, Servicing and Construction
- Preferred Policy Option 29: Waterways
- Preferred Policy Option 30: Broadband and Electronic Communications

2.3 **Local Plan Sites for Potential Allocation (Part 2)**

Part 2 of the Regulation 18 Local Plan includes sites for potential allocation as well as supporting policies relating to following topics:

- Housing
- Gypsies and Travellers & Travelling Showpeople
- Employment
- Warner Bros. Studios at Leavesden
- Town Centres & Retail
- Open Space

-
- Education
 - Green Belt
 - Langleybury & The Grove
 - Maple Lodge Wastewater Treatment Works

3 Approach to the SA

3.1 Introduction

This Interim SA Report has been produced to accompany the Preferred Policy Options and Sites for Potential Allocation during the Regulation 18 stage consultation. There is no formal requirement to prepare an SA Report at this stage, however it is common practice to do so as it provides stakeholders with information on how the Preferred Policy Options and Sites for Potential Allocation is predicted to perform in terms of sustainability, as well as providing an opportunity for stakeholders to input into the ongoing SA process prior to the production of the full SA Report at the Regulation 19 stage.

3.2 Methodology

The methodology used to undertake the assessments for the new Local Plan is generally consistent with that used in the SA for the Core Strategy, Development Management Policies DPD, Site Allocations LDD and Gypsy and Travellers LDD³, with some minor amendments to improve the efficiency and effectiveness of the process.

The criteria which have been considered during the assessment process are outlined below.

3.2.1 *Geographic and temporal scope*

The spatial scope for the assessment is largely local (Three Rivers District); however, the assessment takes into account potential cross-boundary effects, as well as regional effects (e.g. those relating to water supply). National effects have also been taken into account wherever appropriate. For example, the effect on CO₂ emissions is likely to have both local and national implications as any reduction will contribute to national targets, whereas effects on surface water quality may be most relevant to the regional water bodies as well as local water bodies, depending on presence of any such water features and their existing quality.

Based on the above, the following terms have been used in the assessment to denote the geographical scale of predicted effects.

Scale		
Symbol	Meaning	Comment
L	Local	Within the District
R	Regional	Affecting neighbouring local authorities
N	National	UK or a wider global impact

3.2.2 *Temporal Scope*

In terms of the temporal scope, the SA examines effects across three temporal scales:

- Short term effects: effects expected in the next 1-10 years;

³ NB: the Gypsy and Traveller DPD was not taken to the Adoption stage

- Medium term effects: effects expected in the next 10-20 years; and
- Long term effects: effects expected in the next 20+ years (after the life of the plan)

Based on the above, the following terms have been used in the assessment to denote the temporal scale of predicted effects.

Symbol	Timescale	
S	In the Short Term	0-10 years
M	In the Medium Term	10-20 years
L	In the Long Term	After life of plan

3.2.3 *Permanence of effects*

The assessment of policies, sites and their options also considers whether the effects will be temporary or permanent. These are reported in the assessment as shown below.

Permanence		
Symbol	Meaning	Comment
P	Permanent	E.g. Effects lasting during and beyond the life of the plan
T	Temporary	E.g. Effects during construction

3.2.4 *Significance of effects*

The significance of the effects predicted in the assessment are denoted using the symbology shown below.

Significance Assessment	Description
✓✓	The option is likely to have a significant positive effect
✓	The option is likely to have a positive effect which is not significant
?	Uncertain – It is uncertain how or if the option impacts on the SA objective
✓/x	The option is likely to have some positive and some negative effects, none of which are significant
–	Neutral – The option is unlikely to impact on the SA objective
x	The option is likely to have a negative effect which is not significant
xx	The option is likely to have a significant negative effect

3.2.5 *Other assessment factors*

The assessment also considers cumulative/synergistic effects, cross-boundary effects and interrelationships between the SA objectives.

Where assumptions have been made these are described in the assessment commentary, as are any uncertainties in the assessments.

Where relevant, suggested mitigation measures and other recommendations are included in the assessment commentary.

3.3 Consultation

3.3.1 *Introduction*

The SEA Regulations require consultation at various stages of the SA process, as indicated in Table 1-1. To date consultation has been undertaken at the stages outlined below.

3.3.2 *Scoping Report – May 2017*

It is a statutory requirement to consult the Environment Agency, Historic England and Natural England on the scope and level of details to be included in the SEA Environmental Report (the SA Report for Three Rivers Local Plan SA). Common practice is to do this through the preparation of a Scoping Report and such a Scoping Report was prepared in May 2017.

It is also best practice to widen out the consultation to include a wide range of stakeholders and therefore key consultees were contacted directly and asked for feedback on the Scoping Report.

Responses were received from Environment Agency, Historic England and Natural England, as well as a range of non-statutory consultees, including: Hertfordshire County Council – Highways; Hertfordshire County Council – Property; Hertfordshire Gardens Trust; and NHS England and Herts Valleys Clinical Commissioning Group.

The representations provided recommendations for additions to the SA Framework Objectives and indicators, as well as identifying issues that should be taken into account in the SA process. Some identified additional policies, plans and programmes which should be taken into account, whilst others provided input relevant to the baseline information and to other evidence base and guidance sources.

The full details of the consultation responses received can be found in Appendix A to this Interim SA Report.

3.3.3 *Issues and Options SA Working Note July 2017*

Consultation on the SA Working Note (July 2017) which was prepared to inform and accompany the Local Plan Issues and Options and Call for Sites consultation was undertaken between 28th July and 8th September 2017.

One response in relation to the SA Working Note was received. This was from Historic England. The details of the response are provided in Appendix A to this Interim SA Report.

3.3.4 *Sites SA Working Note October 2018*

Consultation on the SA Working Note, which was prepared to inform and accompany the Potential Sites for Consultation, took place between 26th October and 21st September 2017.

Responses were received from Historic England; Oxhey Hall Residents Association; Kings Langley Parish Council; Chorleywood Residents Association; and Herongate Residents Association. The response from Historic England provided general comments relating to the appraisal process, as well as site specific comments. The comments from the other respondents were in relation to the assessments for specific sites.

Details of the responses are provided in Appendix A to this Interim SA Report.

4 Sustainability Context and SA Framework

4.1 Introduction

This section summarises the findings from the SA scoping stages. The scoping process seeks to ensure that the Sustainability Appraisal encompasses the key sustainability issues relevant to the District in the context of the Local Plan. This section provides the environmental and sustainability context by:

- Examining the relationship of the Local Plan with other policies, plans and programmes, to identify all relevant environmental protection objectives and to identify potential conflicts to be addressed within the plan-making process;
- Assembling baseline data on the current and future state of the District for the environment and sustainability topics which may be affected by the Local Plan;
- Identifying the key sustainability issues and opportunities which need to be taken into account in the SA; and
- Presenting the SA Framework of Objectives which have been developed to reflect the findings of the three points above and which are used to structure the assessment process.

4.2 Policy Context and Baseline Review

4.2.1 *Policy Context*

The SA process requires authorities to review the requirements of policies, plans and programmes (PPPs) relevant to the content of the Plan to outline:

- The relationship of the Development Plan (Local Plan) with other relevant plans and programmes; and
- The environmental protection objectives - established at international, community or Member State level - relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.

To fulfil this requirement, a review of the relevant plans, policies and programmes has been carried out to identify environmental objectives which may provide constraints or synergies with the plan being formulated. The review was undertaken on SA topic by topic basis, with the findings being presented in the update to the Scoping Report information which is included in Appendix B to this report.

4.2.2 *Baseline review*

In order to assess how the Local Plan will contribute to sustainable development, it is essential to understand the present economic, environmental and social baseline of the District, and to predict how they may progress without implementation of the Plan. Therefore, a key step in the SA process is establishing the current state of the environment and its likely evolution in the future. This process assists in the identification of sustainability and environmental issues/opportunities in the District. It is also important to consider the implications of the Local Plan in its wider context. Baseline data is required to establish the present state of the District and its surrounding area and will be used subsequently for comparative purposes when monitoring and evaluating the Local Plan.

A practical approach is generally taken to data collection bearing in mind data availability and trend analysis, following which the actual data and gaps in information to consider in the future are reported

at the scoping stage. This reporting also takes into account uncertainties in the data. A Scoping Report was prepared in May 2017 and was updated in July 2017 to take account of responses received during the consultation of the original Scoping Report.

The baseline data in the Scoping Report has been further updated and is presented in Appendix B to this report.

The information has helped to identify the key sustainability issues and opportunities which have been used in the development of the SA Framework of Objectives. Key issues and opportunities are discussed in Section 4.3.

NB: As with the review of other plans, policies and programmes this baseline review does not provide an exhaustive review of information but aims to identify the information most relevant to the SA and Local Plan. Prediction of future trends can be highly uncertain but key trends identified from the available baseline data, and therefore potential sustainability issues have been identified.

4.3 Identifying Environmental and Sustainability Issues

The review of plans and programmes affecting the District, and the collation of the baseline data informed the identification of a series of environmental problems or issues that could be addressed by, or affect the strategies, policies and allocations developed in the Local Plan. Such issues, problems and opportunities have been identified through:

- Review of other policies, plans and programmes and the baseline data;
- Response to the Scoping Report consultation and subsequent consultations on SA documents; and
- Additional work on the sustainability appraisal during the post-scoping stages for the new Local Plan.

The issues and opportunities that have been identified during these stages are provided at the end of each of the Topic sections in the Sustainability Context Review in Appendix B and are repeated in Table 4-1.

Table 4-1: Key sustainability issues and opportunities

Biodiversity, including flora and fauna, and Geodiversity
<ul style="list-style-type: none"> • Although the SSSIs are considered to be within or close to Natural England PSA targets, they may be under pressure due to the high housing targets the district should fulfil. • Protect and improve existing habitats, including buffer areas, migration routes, stepping stones and landscape features which could potentially be of major importance for wildlife. • Enhance Green Infrastructure at a local level and a strategic level with neighbouring authorities. • Compensate features lost to development where loss is completely unavoidable. • Local Plan to promote the use of management agreements for designated sites, where this can be linked to development. • Minimise fragmentation of wildlife habitats as a result of development.
Climatic factors
<ul style="list-style-type: none"> • Carbon emissions per capita for Three Rivers are above the regional average and national average; however they were lower in 2014 than they were in 2005. • Greenhouse gas emissions are likely to lead to significant climate changes which could have significant implications for other aspects of quality of life. • The future climate in Hertfordshire is predicted to become warmer, with drier summers and wetter winters. • Increased river and surface water flood risk. • Development proposals could exacerbate flooding elsewhere in catchment and this needs to be avoided by adopting the sequential approach to site selection advocated in the NPPF. • Promote the use and generation of renewable energy and promote energy efficiency. • Implement Sustainable Drainage Systems - porous surfaces, greenspace, wetlands, flood storage areas, urban forestry to help manage some of the effects from climate change. • Opportunity to decrease greenhouse gas emissions through reduced reliance on the private car.
Air quality
<ul style="list-style-type: none"> • Whilst overall levels of pollutants are low across the District, there is still an area around junction 18 of the M25 where annual mean nitrogen dioxide concentrations are being monitored for exceedances of the relevant Air Quality Objective. • Increased air pollution from a growth in traffic and congestion is likely in the District. • Ensuring that potentially polluting processes incorporate pollution minimisation measures. • Ensuring that potentially polluting developments are not located close to sensitive developments (e.g. care homes, schools etc.) or in areas of existing poor air quality. • Ensuring that sensitive developments are not located in areas of poor air quality. • Promoting the development of Green Travel Plans. • Improving cycle and pedestrian routes and links and cycle parking facilities to encourage the use of non-motorised transport. • Promoting low emission vehicles, such as through the provision of electric vehicle charging infrastructure. • Reducing the need to travel through developing in sustainable locations
Landscape and Townscape
<ul style="list-style-type: none"> • Three Rivers falls into three Landscape Character Areas: 'Northern Thames Basin', 'Thames Valley' and 'Chilterns'. • Light pollution is rapidly increasing and tranquillity is rapidly decreasing in the East of England. This should be monitored and new lighting should be designed and selected that minimises light pollution. • Recognise the value of all landscapes, not only designated sites and ensure that landscape proposals for development schemes reflect local landscape character. • Ensure that the character, diversity and local distinctiveness of all the landscapes of the District are maintained, enhanced or restored, including the Chilterns AONB. • Preserve, and appropriately manage development within, the Green Belt. • Ensure that access to landscape character areas is socially inclusive.

Historic Environment
<ul style="list-style-type: none"> • The historic environment, including heritage assets, is under pressure from development and regeneration and associated traffic congestion, air quality and noise pollution. This puts heritage assets at risk of neglect or decay. The threat of infilling and replacement with new buildings and the erosion of historic features in the public realm need to be carefully mitigated and managed. • Recognise the importance of cultural heritage and archaeological features and the importance of regenerating and re-using important buildings, particularly those listed as 'heritage at risk'. • The historic environment can make a significant contribution to the success of development. Opportunities to conserve and enhance the historic environment including designated and non-designated heritage assets and their settings should be sought where possible through sustainable development proposals. • Be proactive in preparing development briefs to renew, restore and redevelop neglected and deteriorating sites of historic character. • Ensure there are strong and robust design standards for new development that respect cultural heritage of the development area. • Access to heritage assets, including buildings, monuments and historic parks and gardens is linked to improved health and wellbeing. • Development may result in significant loss or erosion of the landscape or townscape character or quality, which is likely to also have significant impact (direct and or indirect) upon the historic environment and people's enjoyment of it.
Material Assets
<ul style="list-style-type: none"> • Waste production and disposal is a growing problem. Production of waste and disposal of this waste is becoming increasingly difficult, with diminishing numbers of suitable sites for landfill disposal. Hertfordshire as a county is having to use sites in Buckinghamshire and Oxfordshire in order to meet its needs. There is however, an increasing move towards ERF facilities rather than landfill. • There is the opportunity to promote the use of renewable resources, protect natural resources and reduce waste. • Supporting a reduction in the amount of waste deposited in landfill. • Supporting alternative methods of waste management, e.g. minimisation and recycling by incorporating facilities within development schemes. • Encouraging re-use and recycling of construction waste in development schemes through the use of planning conditions. • Promoting development on previously developed land and maximise the efficient use of land. • Three Rivers District Council and the other Local Planning Authorities will need to continue to consult with Thames Water about the phasing and planning of future development within the Maple Lodge WWTW catchment area to ensure they can investigate, plan and secure appropriate funding for the construction of any necessary infrastructure. • The District's location in the sand and gravel belt needs to be taken into consideration when planning for new development.
Soils
<ul style="list-style-type: none"> • Soils in the District are vulnerable to groundwater contamination and erosion of chalk soils. Overland flow is also a main risk in the south. Farmed land here in the north of Three Rivers is vulnerable to pollution run-off and rapid through-flow to streams; with the potential to trigger erosion. • There is the potential for soil loss, compaction and degradation as a result of new development. • Protecting the best and most versatile agricultural land. • Promoting good soil handling practices. • Encouraging development on previously developed land.
Water
<ul style="list-style-type: none"> • There are some issues with ecological river water quality in Three Rivers.

- Over abstraction of water resources is an issue in the region. The Chilterns Chalk Streams are particularly susceptible to over abstraction.
- Some areas of Three Rivers are at risk from flooding. The functional flood plans of the Chess Valley and the Colne Valley should be protected.
- There are issues relating to the future capacity of waste water treatment works serving the area.
- Considering overall siting of development schemes in order to minimise potential effects on water quality.
- Taking account of groundwater resources and sensitivities (e.g. source protection zones) when allocating sites for development.
- Encouraging the use of Sustainable Drainage Systems in new developments to minimise negative effects on river quality.

Population

- Despite the relatively low levels of deprivation in the District as a whole, there are however small pockets of more deprived areas within Three Rivers, particularly around South Oxhey.
- Take account of an increasing population.
- Take account of an ageing population.
- Tackle issues of deprivation in certain areas of the District.
- Ensure adequate housing, facilities and infrastructure whilst protecting and enhancing the local environment.
- Use planning obligations to help secure an appropriate range of facilities.

Health and Wellbeing

- Need to address health inequalities.
- Demand for healthcare in the District is likely to increase as the population increasing, particularly the number of elderly residents.
- Priorities in Three Rivers are to increase levels of physical activity in adults and reduce levels of obesity, to reduce the prevalence of smoking and to help the expanding older population keep healthy.
- Three Rivers' increasing population will lead to additional pressure on secondary healthcare services in the District and also the County as a whole. The increasing proportion of older people in the District's population is also likely to have put pressure on secondary healthcare needs, as they are likely to utilise healthcare services more than others.
- Encourage sustainable transport modes and healthy forms of travel and exercise, e.g. walking/cycling and access to leisure and recreational facilities.
- Encourage the provision of convenience stores that provide fresh produce in accessible locations and explore using planning obligations to help secure an appropriate range of facilities.
- Designing out crime by improving the urban environment. This may be through redevelopment or adding additional security features such as CCTV and improved lighting.
- Developing community activities and facilities that can divert people away from crime, improve tolerance and prevent anti-social behaviour.

Housing

- The District's population is changing with growing numbers of elderly residents forecast as a result of increased life expectancy. While this will add to the number of one person households and the population in communal homes, there is also evidence of an increase in the number of young children and more sharing. The past long term trend of declining household size has slowed significantly.
- The price of housing compared to earnings is an issue.
- Meeting needs of Gypsy and Traveller communities even when they no longer choose to travel. Providing a more settled base for Gypsies and Travellers, enables these communities to have better access to key services (health, education and employment).
- Ensuring the provision of a range of housing types to satisfy demand including affordable housing and mixed use developments and a range of housing types of varying sizes.
- Additional growth is likely to increase the pressure on affordable house in the District. This needs to be addressed to ensure the future prosperity of the area.
- Provision of affordable housing in accessible locations.
- Ensuring appropriate housing provision for the elderly and disabled population, e.g. through independent living housing, Life-long homes and appropriate forms of affordable housing.
- Ensuring that such housing is located near to the necessary services and facilities and public transport.

Transport and Accessibility
<ul style="list-style-type: none"> • Pressures due to population growth which leads to increasing levels of traffic, which in turn exacerbates congestion, particularly during peak times. • All the key roads in southwest Hertfordshire are under pressure from heavy levels of traffic, and associated congestion, which has adverse effects on air quality, quality of life and the local economy. • Only 6% of all new residential developments in 2016 were within 30 minutes public transport time of a hospital. Improving bus services to the Watford General Hospital should help to improve access for Three Rivers' residents. • Use planning obligations to secure improvements to public transport. • Providing and maintaining safe and available infrastructure for healthy pursuits – cycle ways, dedicated walkways. • Encourage sustainable transport modes through the requirement for green travel plans in large new developments. • Expansion of Luton Airport could put increased pressure on M25 and M1, motorway junctions and wider road network. • Provision of infrastructure to enable the increased use of sustainable modes of transport (e.g. cycle parking facilities, electric vehicle charging points). • Make developments permeable to provide improved opportunities for walking and cycling.
Economy, employment and education
<ul style="list-style-type: none"> • Maintaining a strong employment base is essential for the future prosperity of the area. • Providing a range of employment sites, including ones that will be attractive to inward investment. • Providing incubator units and units with shared facilities, e.g. reception and meeting facilities etc. Local Plan to identify suitable locations. • Providing a range of employment sites that will be attractive to knowledge based industries. • Supporting employment opportunities in higher value activities, e.g. knowledge based industries. • Ensuring provision of a range of education facilities. Planning obligations should be used to enhance existing educational facilities, including allocating land for new schools where required. Increasing provision for secondary school places is particularly important as there is a shortage in the District from 2017/18 to 2026/27. • Providing facilities and services to support the improvement of GCSE attainment in schools.

4.4 SA Framework

Informed by the issues identified, a framework of SA objectives has been developed covering a range of environmental, social and economic topics. It is similar to that used during the SA of the Core Strategy, Development Management Policies DPD and Site Allocations DPD, but with some modifications in order to simplify and to fill some gaps in the previous framework.

The sustainability objectives are quite distinct from the Local Plan objectives. They focus on outcomes, and define the basis for achieving social, economic and environmentally sustainable development. They have been compiled using information from the review of relevant plans and programmes, baseline review and review of key issues.

The purpose of the SA Framework is to provide a way in which the effects of the plan can be described, analysed, and compared. This process involves considering the content of the Local Plan against the identified SA objectives.

The SA Framework contains a high level objective for each topic (see Table 4-2), supported by a set of more detailed sub-objectives (appraisal criteria) for use when assessing Plan policies and considering wider whole-Plan effects. For undertaking the assessment of the individual site allocations and area specific policies a more detailed set of site specific criteria has also been developed. This full SA Framework is presented in Appendix C.

Table 4-2: SA Framework Objectives

SA Objective		Abbreviated Reference Term
1	To protect, maintain and enhance biodiversity and geodiversity at all levels	Biodiversity & geodiversity
2	To protect, maintain and enhance water resources (including water quality and quantity)	Water quality/quantity
3	To reduce flood risk	Flood risk
4	Reduce greenhouse gas emissions and adapt to the effects of climate	Climate change
5	Achieve good air quality, especially in urban areas	Air quality
6	Make efficient use of land and protect soils	Soils
7	To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible	Resource efficiency
8	To identify, conserve and enhance the historic environment and heritage assets	Historic environment
9	To conserve and enhance landscape and townscape character and encourage local distinctiveness	Landscape & townscape
10	To improve the health and wellbeing of the local population	Health & wellbeing
11	To develop in sustainable locations	Sustainable locations
12	To improve community cohesion through reducing inequalities, promoting social inclusion and reducing crime and the fear of crime	Community cohesion
13	Ensure that everyone has access to good quality housing that meets their needs	Housing
14	Achieve sustainable levels of prosperity and economic growth	Sustainable prosperity
15	To ensure local residents have employment opportunities and access to training	Employment & skills

These SA objectives have been and will continue to be used to structure and inform the assessment of the Local Plan through all stages of its development.

4.5 Inter-relationships between SA Objectives

The SA topics cannot be considered in isolation from one another, as there are a variety of inter-relationships that exist. Air quality is a topic which cuts across most of the other SEA topics, with proven links between air quality and human health (respiratory problems). It can also have indirect effects on biodiversity, soil and water quality, and the condition of heritage assets, whilst there is a more direct link between traffic emissions causing poor air quality and the emissions of CO₂.

The development of sites (residential, employment, retail etc) may show inter-related effects on criteria such as biodiversity, air quality, greenhouse gas emissions, landscape and townscape depending on where they are located, how the development takes shape/is designed, and how it is accessed.

Positive effects can also occur from inter-relationships, for example, protecting landscape quality and/or soil, may lead to habitats and species being indirectly protected, whilst improvements to water quality could result in positive effects for biodiversity.

During the assessment the SA topics (through the SA Objectives) should not be considered in isolation as many inter-relationships exist that need to be taken into account. Some of these relationships are clear cut and easy to understand, for example reduced greenhouse gas emissions and improved air quality which would both result from transport modal shift to sustainable travel modes. Others however can be less obvious, but are equally important and need to be understood when assessing the Local Plan. For example there are inter-relationships between climate change adaptation measures and improvement in human health, from improved safety associated with reducing the risk of properties flooding, through to reduced levels of stress and improved well-being resulting from improvements to energy efficiencies of homes.

Close inter-relationships exist between environmental topics such as air quality, water quality, soil and biodiversity, with improvements or degradation to one often resulting in a similar effect on the other related media/topics. For example increased air pollution can have adverse effects on soil, water quality, and biodiversity through acidification. These effects can then cause issues relating to landscape degradation.

Inter-relationships that will be considered in the SA include the following:

- Air quality influences human health which affects quality of life and also economic activity.
- Local residents and businesses experience air quality at the local level, which affects health and amenity.
- A healthy natural environment improves quality of life. Provides economic benefits through attracting inward investment and increased revenue through tourism.
- Economic growth if undertaken unsustainably could adversely impact upon these assets.
- Greenhouse gas emissions could lead to significant climate change which is likely to affect water resources (supply and demand), alter habitats, affect air quality and public health and increase flood risk. These could all adversely impact upon the District's economy.
- Local topography can influence the levels of walking and cycling and therefore have implications for greenhouse gas emissions, air quality and health and wellbeing.
- The historic environment and cultural heritage contributes to the overall diversity and value of the landscape. It also provides economic benefits and is a source of enjoyment for the population.
- An attractive landscape improves quality of life which in turn could contribute to increase inward investment. Green Infrastructure provides health and wellbeing benefits.
- Noise pollution can both affect tranquillity of landscapes and have adverse effects on health and wellbeing.
- Woodland provides an important role in carbon sequestration.
- Material assets include resources such as land, building materials and other resources which are non-renewable. The topic is concerned with the efficient use of resources, including re-use of brownfield sites and sustainable waste management.
- The quality of the material assets in the District contributes to overall quality of life and can impact upon the region's economy.
- Soil resources are key to sustaining the agricultural economy.
- Climate change is resulting in more extreme weather conditions and will heighten flood risk and demands on water resources.

-
- Negative synergy likely for flora and fauna when water bodies with low water flow combined with poor quality water
 - Benefits of improved human health include employment provision and contribution to the local economy, training, research opportunities, reduced burden on social services and public finances.
 - Provision of housing to meet local needs is important both for the wellbeing of communities and also for the local economy.
 - Poor health and well-being will adversely impact upon economic growth in the District.
 - Social considerations and quality of life will impact on employment opportunities and ability to attract inward investment.

4.6 **Compatibility between SA Objectives and Local Plan Vision and Objectives**

A compatibility assessment between the SA objectives and the Local Plan Vision and Objectives (see Section 2.2.1) has been undertaken in order to identify whether there are any incompatibilities or tensions between certain objectives. Where potential incompatibilities are identified these will need to be taken into account when undertaking the assessment process and appropriate mitigation measures or alternative approaches considered in the Local Plan. The results of this assessment are shown in Figure 4-1.

Figure 4-1: Compatibility between SA Objectives and Local Plan Vision and Objectives

New Local Plan Vision & Objectives	SA Objectives (abridged)														
	SA1 Biodiversity and geodiversity	SA2 Water quality/quantity	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape and townscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Sustainable prosperity	SA15 Employment and skills
Vision	?	?	?	?	?	?	?	+	+	+	?	+	+	+	+
1. Homes	?	?	?	?	?	?	?	?	?	+	0	+	+	0	0
2. Employment	?	?	?	?	?	?	?	?	?	0	0	+	0	+	+
3. PDL	+	0	0	0	0	+	0	0	+	0	0	0	0	0	0
4. Infrastructure	?	0	0	0	0	0	0	?	?	0	0	0	0	+	0
5. Shops/Services	0	0	0	0	0	0	0	0	0	+	0	+	0	+	+
6. Sust. Transport	0	0	0	+	+	0	0	0	0	+	0	0	0	0	0
7. Reduce travel	0	0	0	+	+	0	0	0	0	+	+	0	0	0	0
8. Historic Env.	0	0	0	0	0	0	0	+	+	+	0	0	0	0	0
9. Reduce Env. Imp.	+	+	0	+	+	+	+	?	?	+	0	0	0	0	0
10. Leisure/Rec.	?	0	0	0	0	0	0	?	?	+	0	+	0	0	0
11. Green Inf.	+	+	+	+	+	+	0	0	+	+	0	0	0	0	0
12. Blue Inf.	+	+	+	+	+	0	0	0	+	+	0	0	0	0	0
13. Safety/Security	0	0	0	0	0	0	0	0	0	+	0	+	0	0	0
14. Ageing Pop.	0	0	0	0	0	0	0	0	0	+	0	+	0	0	0
15. Health/Wellb'g	0	0	0	0	0	0	0	0	0	+	0	+	0	0	0

Symbol	Compatibility
+	Objectives compatible
0	Objectives not related
-	Objectives incompatible
?	The objective relationship is unknown or is dependent on implementation

The proposed Vision for local planning in Three Rivers District sets a general aspiration for how development in the District will meet the needs of the population whilst at the same time protecting the character of the District. This Vision has therefore been identified as being compatible with the social and economic SA objectives, however there is uncertainty against the environmental SA

objectives as in order to deliver the new development required to meet the needs there could be impacts on the environment – much will be dependent on the type, scale location and design of the new development and associated infrastructure. For the same reason uncertainties exist between the Local Plan objectives relating to homes and employment.

In general the remaining Local Plan objectives are either compatible with the SA objectives or have no relationship. However there are some additional uncertainties relating to the Local Plan objectives which cover infrastructure, reducing environmental impact and leisure and recreation. These uncertainties have been identified as there could be the potential for new infrastructure, renewable energy schemes and leisure facilities to have some impacts on the historic environment, landscape and townscape and biodiversity.

It should be recognised that whilst some uncertain compatibilities have been identified for specific objectives, there are other objectives that will help to overcome these. For example, where uncertain compatibility has been identified between housing and the historic environment, the Local Plan objective *“8 To conserve and enhance the historic environment and resist the loss of, or damage to, heritage assets”* will help to ensure that adverse effects are minimised.

The Regulation 18 Local Plan includes a series of policies aimed at protecting and enhancing the environment and public realm and helping towards achievement of associated Local Plan objectives. These policies will help towards mitigating the negative effects associated with new development that are identified in the sustainability appraisal for the individual policies and sites.

5 Consideration of Options

5.1 Introduction

The consideration and appraisal of alternative options is an integral part of the plan making and SA processes. During the development of the Local Plan a range of both strategic and more detailed options have been considered and assessed through the sustainability appraisal process in order to arrive at the Council's proposed approach in the Regulation 18 Local Plan.

The Environmental Assessment of Plans and Programmes Regulations 2004⁴ require that the SEA shall:

"... 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." Article 11 (2).

and that the Environmental Report (the Publication SA Report in the case of the new Three Rivers Local Plan) should include:

"8. 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." Schedule 2.

The SA Working Notes and SA Reports that are being prepared during the development of the Local Plan provide the findings of the assessments of options that are undertaken during the various stages of the development of the Local Plan and where appropriate provide the reasons for selecting the options taken forward to the next stage of the planning process and the reasons for not taking forward others.

It should be noted that the role of the SA in this process is to provide assessments of the alternatives being considered, not to make the decision as to which alternatives are taken forward or which alternatives should be considered to be 'reasonable alternatives'. This is made clear in Government guidance on SEA⁵:

"It is not the purpose of the SEA to decide the alternative to be chosen for the plan or programme. This is the role of the decision-makers who have to make choices on the plan or programme to be adopted. The SEA simply provides information on the relative environmental performance of alternatives and can make the decision-making process more transparent". (Paragraph 5.B.7)

The guidance provides further details on how to consider alternatives as summarised in the following extracts:

Identifying alternatives

"Only reasonable, realistic and relevant alternatives need to be put forward. It is helpful if they are sufficiently distinct to enable meaningful comparisons to be made of the environmental implications of each".

⁴ Statutory Instrument 2004 No. 1633

⁵ A Practical Guide to the Strategic Environmental Assessment Directive. ODPM, 2005

Assessing alternatives

“The assessment of alternatives may be made in broad terms against the SEA objectives, provided there is sufficient detail to identify the significant environmental effects of each alternative. Where appropriate any cumulative, secondary and synergistic, short, medium, and long-term effects need to be highlighted, indicating whether they are likely to be permanent or temporary”.

In developing the Local Plan the Council have considered a range of alternative strategies, policies and potential sites, with the SA feeding into this process. The following sections provide a summary of the different stages at which this has occurred, with further details of the options and the findings of the SA being provided in Appendix D to this report.

5.2 Local Plan Strategy and Policy Options

5.2.1 Issues and Options – July 2017

In summer 2017 the Council undertook a consultation on their Issues & Options and Call for Sites Consultation Document. This identified some of the issues and challenges facing the District and the possible options that could help to address them.

The Council sought views on the content of the document and how best to balance the delivery of growth across the District, in order to meet the future needs of the community, whilst at the same time protecting the District’s historic and natural environment.

Alongside this consultation, and again in 2018, the Council invited land owners, agents and developers to submit new sites that could be developed to meet future demand for homes and jobs.

A Sustainability Appraisal Working Note was produced in July 2017 to accompany the Issues and Options and Call for Sites Consultation in order to provide an assessment of the likely environmental, social and economic effects of the various options being considered. The findings of the SA at that stage are summarised in Appendix D. The full SA Working Note is available at the following weblink:

<https://www.threerivers.gov.uk/download?id=40507>

Many of the options that were included in the Issues and Options consultation were high level ‘principles’ and none of the options provide any location specifics. This meant that a lot of uncertainty was identified in the assessments.

5.2.2 Further Consideration of Strategy and Policy Options

In addition to providing summaries of the 2017 Issues and Options assessments, Appendix D provides information on other alternatives which have been considered during the development of the Local Plan to this new Regulation 18 stage.

This is presented for each Preferred Policy Option, with information provided on alternatives which have been considered for each policy (where applicable) along with reasons as to why certain alternatives were rejected and others taken forward.

5.3 Site Allocation Options

5.3.1 *Introduction*

Part 2 of the Regulation 18 Local Plan includes sites identified as having potential for allocation for the following land uses: housing, gypsy and traveller and travelling showpeople accommodation, employment (including Leavesden Studios), town centre and retail development, open space and education.

In relation to the housing sites, the Council have considered a wide range of alternatives during the process to select the sites which will be needed to deliver the level of housing growth required to meet the Objectively Assessed Need for the District.

This section provides a summary of the SA work which has been undertaken to support the Council's site allocation process.

5.3.2 *Potential Sites for Consultation (October 2018)*

In October 2018 an SA Working Note was prepared to accompany the consultation on the Local Plan 'Potential Sites for Consultation'.

In advance of undertaking the SA of the Potential Sites, the sustainability appraisal provided input into the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) methodology. This was a key early input from the SA process as it ensured that the methodology used by TRDC was aligned with the SA Framework at a level appropriate to the early consideration of site options. It also avoided unnecessary duplication of work between the plan making and SA activities, as the SA has drawn from information in the SHELAA rather than having to unnecessarily undertake separate evidence gathering.

For the SA Working Note (October 2018) an individual assessment was undertaken for each of the Potential Sites which had a separate schedule within the Potential Sites for Consultation document, these being the sites that are capable of accommodating 100 dwellings or more and sites put forward for other uses such as employment and education. For the smaller sites of fewer than 100 dwellings the SA included a single assessment of these sites for each settlement, which identified any key constraints associated with any of the sites.

The SA Working Note is available at the following link:

www.threerivers.gov.uk/egcl-page/new-local-plan

5.3.3 *Additional Sites put forward (July 2019)*

Following the consultation on Potential Sites which took place from 26 October - 21 December 2018 a further 29 sites were submitted to the Council for consideration. These sites were assessed using the same methodology as used for the consultation sites and the SA Working Note (October 2018) was been updated (July 2019) to include these new assessments.

The SA Working Note update (July 2019) is available at the following link:

www.threerivers.gov.uk/egcl-page/new-local-plan

5.3.4 *Site Assessments 2020*

Further to the SA work described above, in 2020 the SA assessed all sites which were included in the Three Rivers Strategic Housing and Economic Land Availability Assessment (SHELAA) (2020) as well as potential new settlement areas which were identified in the Edge of Settlement and New Settlement

Scoping Report (2020). The sites have been identified from various different sources, resulting in eleven 'site categories'. The categories and an explanation of how the sites within each category were identified are noted below:

1. Call for Sites (CFS): Sites in this category were sourced through the Call for Sites exercise undertaken in July-September 2017.
2. Additional Call for Sites (ACFS): Sites in this category were sourced through the second Call for Sites exercise, which was undertaken in August 2018.
3. Potential Sites Call for Sites (PSCFS): Sites within this category were sourced through the third Call for Sites exercise, which was undertaken in October-December 2018.
4. Previously Considered Sites (PCS): Sites in this category are those which were promoted during the preparation of the Site Allocations LDD (2014) but were not adopted as site allocations.
5. Other Sites Put Forward (OSPF): Sites in this category are those which were promoted outside of the formal Call for Sites exercises.
6. Urban Capacity Sites (varying references, dependent on location): Sites in this category were identified in the Urban Capacity Study (2020) and subsequently included in the SHELAA.
7. Refused and Withdrawn Application Sites (RWA): Sites in this category were sourced from a review of full and outline planning applications which were refused or withdrawn over the 2015-2020 period.
8. Edge of Settlement Sites (EOS): Sites in this category were identified in the Edge of Settlement and New Settlement Scoping Report (2020).
9. Out of Settlement (OOS): Sites in this category were identified in the Edge of Settlement and New Settlement Scoping Report (2020).
10. Existing Allocations (H): Sites in this category are existing allocations in the Site Allocations LDD (2014) which have not been granted planning permission.
11. Brownfield Register Sites (BR): Sites in this category are those which are on Three Rivers District Council's Brownfield Land Register (2019). Sites on the Brownfield Land Register which are existing allocations or were promoted through the Call for Sites exercises were not included in this category to avoid duplication between categories.

The assessments of these sites against the SA framework of objectives are included in Appendix F and Appendix G of this Interim SA Report, as follows:

- Appendix F includes all the 'Sites Proposed for Allocation' in the Regulation 18 Local Plan.
- Appendix G includes all the sites which are not being taken forward.

In addition to these potential housing sites the SA has also assessed potential site allocations for non-residential uses, including those for employment and education. Some of these sites are existing allocations in the Site Allocations LDD, whilst others are new proposals for allocation. The assessments for those sites are also included in Appendix F.

6 Assessment of Regulation 18 Local Plan

6.1 Introduction

The proposed policies and site allocations which are included in the Regulation 18 Local Plan have been assessed using the methodology described in Section 3.2 in order to identify the likely effects which would result were the policies to be adopted in a new Local Plan. The findings of the SA undertaken at this stage will be used to inform the next stage of the planning process, that being the development of the Publication Local Plan.

The sections which follow summarise the results of the assessments for each Local Plan element followed by an assessment by SA objective of the plan as a whole (including any cumulative, synergistic and secondary effects). In addition, cross boundary effects are discussed in Section 6.5.

These assessments have considered the potential effects which would result from implementation of the policies and sites in isolation and in general do not consider potential mitigation or enhancement measures which could help to improve the sustainability performance of the policy or site, whether this would be from other elements in the Local Plan or non-Local Plan related mitigation/enhancement. Where appropriate the potential mitigation/enhancement is presented as an addition to the specific assessments.

6.2 Summary of the Assessment of Regulation 18 Local Plan Part 1

The detailed assessments for all the 'Proposed Policies' which are included in Part 1 of the Regulation 18 Local Plan are provided in Appendix E to this Interim SA Report. A summary of these assessments is provided below.

Policy/Theme	SA Objectives														
	Biodiversity	Water	Flood Risk	Climate Change	Air Quality	Soils	Resource Efficiency	Historic Environment	Landscape and Townscape	Health and Wellbeing	Sustainable Location	Community Cohesion	Housing	Sustainable Prosperity	Employment and Skills
Sustainable Development															
Potential Housing Distribution	✓	-	-	✓	✓	✓	-	-	✓	✓	✓✓	✓	✓	✓	✓
Housing Growth Level	x	x	-	x	x	x	x	?	x	✓	-	?	✓/x	✓	✓
Preferred Policy Option 1: Strategic Policy: Overarching Policy on Sustainable Development	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Preferred Policy Option 2: Housing Mix and Type Preferred Policy Option 3: Housing Density Preferred Policy Option 4: Affordable Housing	-	-	-	✓	✓	✓	-	✓	x	?	✓	✓	✓✓	-	-
Preferred Policy Option 5: Provision for Gypsies, Travellers and Travelling Showpeople	✓	-	✓	-	-	-	-	✓	✓	-	✓	✓	✓	-	-
Preferred Policy Option 6: Residential Design and Layout and Accessible and Adaptable Buildings	-	-	-	-	-	-	-	-	?	✓	-	✓	✓	-	-
Employment															
Preferred Policy Option 7: Employment and Economic Development Preferred Policy Option 8: Warner Bros. Studios at Leavesden	?	-	-	x	x	✓	-	?	x	-	✓	-	-	✓✓	✓✓
Preferred Policy Option 9: Retail and Leisure	-	-	-	✓	✓	-	-	✓	✓	?	✓	✓	-	✓	✓
Social and Community Facilities/ Health and Wellbeing															
Preferred Policy Option 10: Social and Community Facilities Preferred Policy Option 11: Health and Wellbeing	✓	-	-	-	-	-	-	-	✓	✓✓	✓	✓✓	-	-	-

Climate Change															
Preferred Policy Option 12: Carbon Dioxide Emissions and On-site Renewable Energy	✓	✓✓	✓✓	✓✓	-	-	✓	✓	✓	-	-	-	-	-	-
Preferred Policy Option 13: Adapting to Climate Change and Sustainable Construction	✓	✓✓	✓✓	✓✓	-	-	✓	✓	✓	-	-	-	-	-	-
Preferred Policy Option 14: Renewable and Low Carbon Energy Developments	✓	✓✓	✓✓	✓✓	-	-	✓	✓	✓	-	-	-	-	-	-
Preferred Policy Option 15: Flood Risk and Water Resources	✓	✓✓	✓✓	✓✓	-	-	✓	✓	✓	-	-	-	-	-	-
Green Belt															
Preferred Policy Option 16: Green Belt	?	-	-	-	-	✓	-	-	✓	✓	?	-	✓	-	-
Environment															
Preferred Policy Option 17: Ground Conditions, Contamination and Pollution	✓	✓	-	-	✓✓	✓	-	-	✓	✓	-	-	-	-	-
Preferred Policy Option 18: Waste Management and Recycling	-	-	-	-	-	✓	✓✓	-	✓	✓	-	-	-	-	-
Green Infrastructure															
Preferred Policy Option 19: Green and Blue Infrastructure	✓✓	✓✓	✓	-	-	-	-	✓	✓	✓	✓	-	-	-	-
Preferred Policy Option 20: Landscape Character	✓	-	-	-	-	✓	-	-	✓✓	✓	-	-	-	-	-
Preferred Policy Option 21: Biodiversity, Trees, Woodlands and Landscaping	✓✓	✓	✓	-	✓	✓	-	-	✓	✓	-	-	-	-	-
Preferred Policy Option 22: Open Space, Play Space, Sport and Recreation	-	-	-	-	-	-	-	✓	✓	✓✓	-	✓	-	-	-
Design and Heritage															
Preferred Policy Option 23: Local Distinctiveness and Place Shaping	✓	-	-	✓	-	-	-	✓	✓✓	✓	-	✓	✓	-	-
Preferred Policy Option 24: Advertisements	✓	-	-	✓	-	-	-	✓	✓✓	✓	-	✓	✓	-	-
Preferred Policy Option 25: Heritage and Historic Environment	✓	-	-	✓	-	-	-	✓✓	✓✓	-	-	-	-	✓	✓
Transport and Connections															
Preferred Policy Option 26: Sustainable Transport and Travel	✓	?	✓	✓✓	✓✓	-	-	✓	✓	✓	✓	-	-	✓	✓
Preferred Policy Option 27: Parking	✓	?	✓	✓✓	✓✓	-	-	✓	✓	✓	✓	-	-	✓	✓
Preferred Policy Option 28: Deliveries, Servicing and Construction	✓	?	✓	✓✓	✓✓	-	-	✓	✓	✓	✓	-	-	✓	✓
Preferred Policy Option 29: Waterways	✓	?	✓	✓✓	✓✓	-	-	✓	✓	✓	✓	-	-	✓	✓
Preferred Policy Option 30: Broadband and Electronic Communications	✓	?	✓	✓✓	✓✓	-	-	✓	✓	✓	✓	-	-	✓	✓

The assessments of proposed policies identified some significant positive effects against sustainability objectives as described below. No significant negative effects were identified:

	SA Objective	Significant effects identified
1	To protect, maintain and enhance biodiversity and geodiversity at all levels.	✓✓ in relation to Preferred Policy Option 19: Green and Blue Infrastructure and Preferred Policy Option 21: Biodiversity, Trees, Woodlands and Landscaping which seek to conserve and enhance the Local Nature Reserves, Wildlife Sites, Sites of Special Scientific Interest and other important habitats in the District, which would have significant positive effects for biodiversity.
2	To protect, maintain and enhance water resources (including water quality and quantity)	✓✓ in relation to Preferred Policy Option 15: Flood Risk and Water Resources which seeks to protect and increase efficiency of groundwater resources. Preferred Policy Option 19: Green and Blue Infrastructure seeks to conserve and enhance the District's rivers and the canal. These policies would have significant positive effects against the water objective.
3	To reduce flood risk	✓✓ in relation to Preferred Policy Option 15: Flood Risk and Water Resources which would ensure that development is located away from high risk flood zones.
4	Reduce greenhouse gas emissions and adapt to the effects of climate	✓✓ in relation to Preferred Policy Option 12: Carbon Dioxide Emissions and On-site Renewable Energy , Preferred Policy Option 13: Adapting to Climate Change and Sustainable Construction and Preferred Policy Option 14: Renewable and Low Carbon Energy Developments which contain measures to increase energy efficiency and support low carbon and renewable energy sources. Preferred Policy Option 26: Sustainable Transport and Travel contains measures to support sustainable modes of transport, reduce freight activity and reduce private car usage, which would have significant positive effects for the climate change objective.
5	Achieve good air quality, especially in urban areas	✓✓ in relation to Preferred Policy Option 17: Ground Conditions, Contamination and Pollution which requires developments to minimise air pollution and be located in areas which will not cause more pollution in Air Quality Management Areas. Preferred Policy Option 26: Sustainable Transport and Travel contains measures to support sustainable modes of transport, reduce freight activity and reduce private car usage, which would have significant positive effects for the air quality objective.

	SA Objective	Significant effects identified
6	Make efficient use of land and protect soils	No significant effects identified.
7	To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible	✓✓ in relation to Preferred Policy Option 18: Waste Management and Recycling which significantly benefits resource efficiency by encouraging and enabling re-use and recycling of materials right from the point of construction.
8	To identify, conserve and enhance the historic environment and cultural assets	✓✓ in relation to Preferred Policy Option 25: Heritage and Historic Environment which aims to protect and enhance all aspects of the historic environment in the District, including heritage assets, listed or locally important buildings, conservation areas, historic parks and gardens and archaeological assets, which would have a significant positive effect against this objective.
9	To conserve and enhance landscape and townscape character and encourage local distinctiveness	✓✓ in relation to Preferred Policy Option 20: Landscape Character which protects against development in the Chilterns AONB and requires that all developments make a positive contribution to the landscape. Preferred Policy Option 23: Local Distinctiveness and Place Shaping which seeks to enhance the local townscape through high quality design and Preferred Policy Option 25: Heritage and Historic Environment would reserve local character by protecting heritage assets and landscape features.
10	To improve the health and wellbeing of the local population	✓✓ in relation to Preferred Policy Option 10: Social and Community Facilities and Preferred Policy Option 11: Health and Wellbeing . These policies support the provision of new open space, sport and recreation facilities and active travel infrastructure which will make a significant positive contribution to residents' health and wellbeing.
11	To develop in sustainable locations	✓✓ in relation to the Potential Housing Distribution , as indicated in paragraph 2.49 of the Part 1 Regulation 18 Local Plan, which prioritises developments in the most sustainable locations close to key services and facilities.
12	To improve community cohesion through reducing inequalities, promoting social inclusion and reducing crime and the fear of crime	✓✓ in relation to Preferred Policy Option 10: Social and Community Facilities and Preferred Policy Option 11: Health and Wellbeing . These policies seek to protect existing social, cultural and community facilities, alongside the provision of enhanced facilities which will be significantly positive for community cohesion.

	SA Objective	Significant effects identified
13	Ensure that everyone has access to good quality housing that meets their needs	✓✓ in relation to Preferred Policy Option 2: Housing Mix and Type , Preferred Policy Option 3: Housing Density and Preferred Policy Option 4: Affordable Housing which ensure that there is a suitable range of types, styles, design and tenure mix to support needs of different groups. Preferred Policy Option 6: Residential Design and Layout and Accessible and Adaptable Buildings contributes toward meeting the District's affordable and accessible housing need.
14	Achieve sustainable levels of prosperity and economic growth	✓✓ in relation to Preferred Policy Option 7: Employment and Economic Development and Preferred Policy Option 8: Warner Bros. Studios at Leavesden as these policies contribute to overall employment levels in a diverse range of jobs, in areas accessible to public transport and with mixed use development which would have a significant positive effect on economic growth in the area.
15	To ensure local residents have employment opportunities and access to training	✓✓ in relation to Preferred Policy Option 7: Employment and Economic Development and Preferred Policy Option 8: Warner Bros. Studios at Leavesden as these policies seek to safeguard existing employment sites (including land for Warner Bros Studios which is of national importance) and would provide new employment space. This would have a significant positive effect on employment opportunities for the District.

6.3 Summary of the Assessment of Regulation 18 Local Plan Part 2

The assessments for all the ‘Sites for Potential Allocation’ and associated policies which are included in Part 2 of the Regulation 18 Local Plan are provided in Appendix F to this Interim SA Report. A summary of these assessments is provided by settlement in the tables below.

6.3.1 Proposed policy on housing allocations

SA Objective	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Policy															
Proposed policy on housing allocations	-	-	-	-	-	-	-	-	-	✓	-	-	✓✓	-	-

6.3.2 Housing allocations included in Regulation 18 Local Plan Part 2

SA Objective	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment	
Site Location																
Abbots Langley & Leavesden	Site Ref: CFS3 Land adjacent to Fortunes Farm, High Elms Lane, Abbots Langley	✗	-	-	✗	-	✗	-	?	✗	?	✓	✓	-	-	
	Site Ref: CFS4 Land at Warren Court, Woodside Road	✗	-	-	✗	-	✗	-	?	?	✓	✗	✓	-	-	
	Site Ref: CFS6 Land at Mansion House Farm Equestrian Centre	✗	-	-	✓	-	✗	-	✗	?	✓	✓	✓	-	-	
	Site Ref: CFS26c Land to the west of the Kings Langley Estate	✗	-	-	✓	?	✗	-	?	✗	?	✓	✓	✓	-	✓
	Site Ref: PCS21 Land at Love Lane	✗			✓		✗				✓	✓	✓			

SA Objective		SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Site Location																
		-	-	-	✓	-	✗	-	?	?	✓	✓	✓	✓	-	-
	Site Ref: EOS4.0 Land adjacent to Bedmond Road	✗	-	-	✓	?	✗	-	?	✗	?	✓	✓	✓	-	-
	Site Ref: AB18 Parsonage Close Garages	?	-	-	✓	-	✓	-	?	?	?	✓	-	✓	-	-
	Site Ref: AB26 Tibbs Hill Road Garages	-	-	-	✓	-	✓	-	?	?	✓	✓	-	✓	-	-
	Site Ref: AB31 Jacketts Field Garages	-	-	?	✓	-	✓	-	-	?	?	✓	-	✓	-	-
	Site Ref: AB32 Yard Tibbs Hill Road	-	-	?	✓	-	✓	-	-	-	?	✓	-	✓	-	-
	Site Ref: AB39 Rosehill Gardens Garages, Abbots Langley	?	-	-	✓	-	✓	-	-	?	✓	✓	-	✓	-	-
	Site Ref: H3 Pin Wei	-	-	-	✓	-	✓	-	?	-	✓	✓	-	✓	✗	✗
	Site Ref: H4 Furtherfield Depot	-	-	-	✓	-	✓	-	-	?	✓	✓	✓	✓	-	-
	Site Ref: H6 Hill Farm Industrial Estate	-	-	-	✓	-	✓	-	-	?	✓	✓	✓	✓	?	?
Bedmond	Site Ref: CFS10 Land between Millhouse Lane and Bell Lane, Bedmond	✗	-	-	✓	-	✗	-	?	?	✓	✓	✓	✓	-	-
	Site Ref: CFS56 Church Hill Road, Bedmond	✗	-	-	✓	-	-	-	?	✗	?	✓	✓	✓	-	-
	Site Ref: ACFS9e Land west of Bedmond Road	✗	-	-	✓	-	✗	-	-	✗	✓	✓	✓	✓	-	-
Garston	Site Ref: CFS65 Land north of Bucknalls Lane	✗	-	-	✓	?	✗	-	-	✗	?	✓	✓	✓	-	-
Kings Langley	Site Ref: ACFS8b Flowerhouse	-	-	✗	✓	?	✓	-	✗	-	?	✓	-	✓	-	✗

	SA Objective	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
	Site Location															
	Site Ref: PSCFS23 Former Chicken Processing Plant, Woodlands Road	?	-	?	x	-	x	-	?	?	✓	x	✓	✓	-	-
Langleybury	Site Ref: H7 Langleybury House	-	-	-	x	-	✓	-	?	-	✓	x	✓	✓	-	-
Croxley Green	Site Ref: CFS19 Land adjacent to 62-84 & 99-121 Sycamore Road	x	?	-	✓	-	x	-	-	-	✓	✓	-	✓	-	-
	Site Ref: CFS20 Land at Croxley Station	-	?	-	✓	-	✓	-	-	-	?	✓	✓	✓	-	-
	Site Ref: CFS61 Cinnamond House, Cassiobridge	-	?	?	✓	-	✓	-	-	-	✓	✓	✓	✓	-	-
	Site Ref: CG16 Garages rear of Owens Way	-	-	?	✓	-	✓	-	-	?	✓	✓	-	✓	-	-
	Site Ref: CG47 Garages off Grove Crescent	-	-	?	✓	-	✓	-	-	?	✓	✓	✓	✓	-	-
	Site Ref: CG65 British Red Cross, Community Way	-	-	-	✓	-	✓	-	?	-	✓	✓	✓	✓	-	-
	Site Ref: H9 33 Baldwins Lane	-	?	?	✓	-	✓	-	-	?	?	✓	✓	✓	?	?
	Site Ref: H10 Killingdown Farm	x	-	-	✓	-	x	-	x	x	✓	✓	✓	✓	-	-
Rickmansworth	Site Ref: OSPF22 Batchworth Park Golf Course	x	?	-	✓	-	x	-	?	?	x	✓	✓	✓	x	x
	Site Ref: CFS59 Land on London Road	x	?	-	✓	-	-	-	?	?	✓	✓	-	✓	-	-
	Site Ref: CFS40a Land at Park Road (Revised Boundary)	x	?	-	✓	-	?	-	x	?	?	✓	✓	✓	-	-
	Site Ref: CFS41 Rickmansworth Station, Station Approach	?	?	-	✓	-	?	-	x	?	?	✓	✓	✓	-	-
	Site Ref: CFS60 Affinity Water Depot, Church Street	-	?	xx	✓	-	✓	-	?	x	✓	✓	✓	✓	-	-
	Site Ref: CFS77 Rickmansworth Library	-	?	-	✓	-	✓	-	x	?	✓	✓	✓	✓	-	-

SA Objective		SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Site Location																
	Site Ref: RWA13 Banstead Down, Old Chorleywood Rd	x	?	-	✓	-	x	-	?	-	?	✓	-	✓	-	-
	Site Ref: H17 Police Station, Rectory Road	-	?	?	✓	-	✓	-	?	-	✓	✓	✓	✓	-	-
	Site Ref: H18 Royal British Legion, Ebury Road	-	?	-	✓	-	✓	-	x	-	✓	✓	-	✓	-	-
	Site Ref: H21 Bridge Motors, Church Street	-	?	?	✓	-	✓	-	x	-	✓	✓	-	✓	-	-
	Site Ref: H22 Depot, Stockers Farm Road	x	-	?	✓	-	✓	-	?	?	✓	✓	✓	✓	?	?
Mill End	Site Ref: EOS7.0 Land to the south of Shepherds Lane and west of M25	x	?	-	✓	?	x	-	?	x	?	✓	✓	✓	-	-
	Site Ref: P4a Quickwood Close Garages (Larger Site)	-	?	-	✓	-	✓	-	-	?	✓	✓	-	✓	-	-
	Site Ref: P7 Oakfield at Garages	-	?	-	✓	-	✓	-	-	?	✓	✓	-	✓	-	-
	Site Ref: P33 Chiltern Drive	-	?	-	✓	-	✓	-	-	-	✓	✓	-	✓	-	-
	Site Ref: P38 Garages at Whitfield Way	-	?	-	✓	-	✓	-	-	?	✓	✓	-	✓	-	-
	Site Ref: P39 The Queens Drive Garages, Mill End	-	?	-	✓	?	✓	-	-	?	?	✓	-	✓	-	-
	Site Ref: RW31 Garden land off Uxbridge Road	x	?	?	✓	-	x	-	?	-	?	✓	-	✓	-	-
	Site Ref: H15 Garages rear of Drillyard, West Way	?	-	-	✓	-	✓	-	-	?	?	✓	✓	✓	-	-
Chorleywood	Site Ref: CFS16 Land at Chorleywood Station (Station car park and adjoining land)	-	-	?	✓	-	✓	-	?	?	?	✓	✓	✓	-	-
	Site Ref: CFS18b Hill Farm, Stag Lane, Chorleywood	x	-	-	✓	-	x	-	x	x	✓	✓	-	✓	-	-

	SA Objective															
	Site Location	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
	Site Ref: CFS57 Pheasants Ridge Gap, Berry Lane	x	?	-	✓	?	x	-	?	x	?	✓	✓	✓	-	-
	Site Ref: CFS72 Land off Solesbridge Lane, Chorleywood	x	-	x	x	?	x	-	?	x	?	x	-	✓	-	-
	Site Ref: ACFS1 Heath House	-	-	-	✓	-	✓	-	x	?	-	✓	-	✓	-	-
	Site Ref: PSCFS19 Land south west of Berry Lane, Chorleywood	x	-	-	✓	?	x	-	?	x	?	✓	-	✓	-	-
	Site Ref: CW9 Garages at Copmans Wick	-	-	?	✓	-	✓	-	-	?	✓	✓	-	✓	-	-
	Site Ref: CW24 Garages rear of Green Street, CW	-	-	-	✓	-	✓	-	?	?	?	✓	-	✓	-	-
	Site Ref: CW25 Ryman Court Garages, Chorleywood	-	-	-	✓	-	✓	-	?	?	✓	✓	-	✓	-	-
Maple Cross & West Hyde	Site Ref: CFS31 24 Denham Way and land to rear of Maple Cross	x	?	-	x	-	x	-	?	x	✓	x	✓	✓	x	x
	Site Ref: MC11 40-42 Longcroft Road	-	?	-	x	-	✓	-	-	-	✓	x	-	✓	-	-
	Site Ref: EOS12.2 Land to the west and south of Maple Cross (combined sites)	x	?	?	✓	?	x	-	x	x	?	x	✓	✓	✓	✓
	Site Ref: EOS12.3 Land to the north of Chalfont Lane	x	?	-	x	?	x	-	?	x	?	x	✓	✓	-	-
Moor Park & Eastbury	Site Ref: CFS22 Knoll Oak, Sandy Lane	x	-	-	x	-	✓	-	-	?	✓	x	✓	✓	-	-
Oxhey Hall	Site Ref: ACFS13b Hampermill Lane (Larger Site)	x	?	-	✓	-	x	-	?	x	✓	✓	✓	✓	-	-
	Site Ref: RWA6 165-167 Hampermill Lane	-	?	-	✓	-	✓/x	-	?	-	✓	✓	-	✓	-	-
	Site Ref: PCS16 Vivian Gardens	x	?	-	✓	-	-	-	-	?	✓	✓	-	✓	-	-
	Site Ref: H24 The Fairway, Green Lane	?	?	-	✓	-	✓	-	?	-	✓	✓	✓	?	-	-

SA Objective		SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Site Location																
South Oxhey	Site Ref: CFS52a Former Sir James Altham School (Revised Boundary)	x	-	-	✓	-	x	-	?	-	✓	✓	✓	✓	-	-
	Site Ref: AS13 Garages at Blackford Road	-	-	?	✓	-	✓	-	-	?	✓	✓	-	✓	-	-
	Site Ref: AS31 Garages at Woodhall Lane	-	-	?	✓	-	✓	-	-	?	?	✓	-	✓	-	-
	Site Ref: NW34a Garages r/o The Dick Whittington	-	-	-	✓	-	✓	-	-	?	✓	✓	-	✓	-	-
	Site Ref: BR20 Northwick Day Centre	?	-	?	✓	-	✓	-	-	-	✓	✓	?	✓	-	-
Carpenders Park	Site Ref: CFS12 Kebbell House and Land to Rear, Delta Gain, Carpenders Park	-	-	?	✓	-	✓	-	-	?	?	✓	✓	✓	✓	✓
	Site Ref: CFS13 Land at Oxhey Lane, Watford Heath	x	-	-	✓	-	-	-	x	x	✓	✓	✓	✓	-	-
	Site Ref: CFS14 Land North of Oxhey Lane, Carpenders Park	x	?	?	✓	-	x	-	-	x	✓	✓	✓	✓	-	-
	Site Ref: CFS69a Land at Carpenders Park Farm - Revised Boundary	x	-	?	✓	-	x	-	?	x	✓	✓	✓	✓	-	-
	Site Ref: PCS47 South of Little Oxhey Lane, Carpenders Park	x	-	?	✓	-	x	-	-	x	✓	✓	✓	✓	-	-

6.3.3 Preferred Policy on Sites for Gypsies and Travellers and Travelling Showpeople

SA Objective Policy	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Preferred Policy on Sites for Gypsies and Travellers and Travelling Showpeople	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-

6.3.4 Potential employment allocations

SA Objective Site location	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Site Ref: CFS70a Croxley Business Park - Employment	?	?	x	✓	-	✓	-	-	?	-	✓	-	-	✓	✓
Site Ref: CFS70b Croxley Business Park - Open Space	x	?	x	✓	-	-	-	-	?	✓	✓	✓	-	-	-
Site Ref: CFS32a Land at Lynsters Farm	x	?	x	x	-	x ?	-	x	x	?	x	-	-	✓	✓

6.3.5 Existing employment sites

SA Objective Site location	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Site Ref: E(a) Croxley Business Park	-	?	?	-	-	-	-	-	-	-	-	-	-	✓	✓
Site Ref: E(b) Tolpits Lane	-	?	?	-	-	-	-	-	-	-	-	-	-	✓	✓
Site Ref: E(d) Maple Cross/Maple Lodge	?	-	-	-	-	?	-	?	-	?	-	-	-	✓✓	✓✓
Site Ref: E(e) Kings Langley Employment Site	-	?	?	-	-	-	-	-	-	-	-	-	-	✓	✓

6.3.6 Warner Bros. Studio at Leavesden

SA Objective Site location	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Site Ref: CFS28 Land at Gypsy Lane, Hunton Bridge Leavesden Studios expansion	x	-	-	✓	-	x	-	-	x	-	✓	-	-	✓✓	✓✓
Site Ref: OSPF6 Land west of Leavesden Aerodrome	x	?	?	✓	-	x	-	?	x	-	✓	-	-	✓✓	✓✓

6.3.7 Education Allocations

SA Objective Policy and Site location	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Proposed Policy on Education Allocations	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓
Site Ref: CFS11 Carpenters Park Farm, Oxhey Lane, Carpenters Park	✗	?	?	✓	-	✗	-	?	✗	-	✓	✓	-	-	✓
Site Ref: S(c) Woodside Road	✗	-	-	✓	-	✗	-	-	✗	-	✓	✓	-	-	✓

6.3.8 Proposed Insetting of Bedmond

SA Objective Policy	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Proposed insetting of Bedmond	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	✓

6.3.9 Langleybury and the Grove

SA Objective Site location	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Proposed Policy on Langleybury and The Grove	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	✓
Site Ref: L&TG Langleybury and the Grove	✗	?	?	✗	?	✓/✗	-	?	-	?	✗	-	✓	✓	✓

6.3.10 *Proposed Policy on Maple Lodge Wastewater Treatment Works*

SA Objective Policy	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Proposed Policy on Maple Lodge Wastewater Treatment Works	·	·	·	·	·	·	·	·	✓	·	·	·	·	·	·

The assessments of sites for potential allocation and associated policies identified some significant positive and negative effects against sustainability objectives as described below:

	SA Objective	Significant effects identified
1	To protect, maintain and enhance biodiversity and geodiversity at all levels.	No significant effects identified
2	To protect, maintain and enhance water resources (including water quality and quantity)	No significant effects identified
3	To reduce flood risk	xx in relation to housing allocation site CFS60 Affinity Water Depot as the River Colne flows through this site which is entirely within Flood Zone 2 and has a large area within Flood Zone 3a and 3b, posing a significant risk of flooding.
4	Reduce greenhouse gas emissions and adapt to the effects of climate	No significant effects identified
5	Achieve good air quality, especially in urban areas	No significant effects identified
6	Make efficient use of land and protect soils	No significant effects identified
7	To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible	No significant effects identified
8	To identify, conserve and enhance the historic environment and cultural assets	No significant effects identified
9	To conserve and enhance landscape and townscape character and encourage local distinctiveness	No significant effects identified
10	To improve the health and wellbeing of the local population	No significant effects identified
11	To develop in sustainable locations	No significant effects identified
12	To improve community cohesion through reducing inequalities, promoting social inclusion and reducing crime and the fear of crime	No significant effects identified

	SA Objective	Significant effects identified
13	Ensure that everyone has access to good quality housing that meets their needs	<p>✓✓ in relation to housing allocation sites CFS26c Land to the west of the Kings Langley Estate, OSPF22 Batchworth Park Golf Course, EOS7.0 Land to the south of Shepherds Lane and west of M25, EOS12.2 Land to the west and south of Maple Cross, and PCS47 South of Little Oxhey Lane. All of these sites have a capacity to support 500 or more dwellings and make a significant contribution towards providing housing in the District.</p> <p>The proposed policy on housing allocations is also identified as having a significant positive effect on the housing objective.</p>
14	Achieve sustainable levels of prosperity and economic growth	<p>✓✓ in relation to Warner Bros Studio at Leavesden expansion sites CFS28 Land at Gypsy Lane, Hunton Bridge and OSPF6 Land west of Leavesden Aerodrome given the importance of the studio to the local and national economy. These sites would allow expansion of the studio which would contribute significantly to the growth of the creative industry in the District.</p> <p>The existing employment site E(d) Maple Cross/Maple Lodge is also identified as having significant positive effects against this objective, as the site is contributing to meeting demand for industrial floorspace in the District due to its spare capacity of approx. 18,000sqm/5ha.</p>
15	To ensure local residents have employment opportunities and access to training	<p>✓✓ in relation to Warner Bros Studio at Leavesden expansion sites CFS28 Land at Gypsy Lane, Hunton Bridge and OSPF6 Land west of Leavesden Aerodrome given the importance of the studio to the local and national economy as an employer and a visitor site. These sites would allow expansion of the studio which would contribute significantly to the growth of the creative industry in the District.</p> <p>The existing employment site E(d) Maple Cross/Maple Lodge is also identified as having significant positive effects against this objective, as the site is contributing to meeting demand for industrial floorspace in the District due to its spare capacity of approx. 18,000sqm/5ha.</p>

6.3.11 Settlement level effects

In addition to the site specific effects associated with the proposed housing allocations, as summarised in Section 6.3, it is also necessary to consider any 'settlement level' effects, for example the cumulative effects that might result from the overall housing increase in a settlement. The approach taken by the SA at this Regulation 18 stage has been to base such assessments on the percentage level of dwelling

number increase in a settlement which would result from the delivery of the proposed housing allocations in the Regulation 18 Local Plan Part 2 Sites for Potential Allocation.

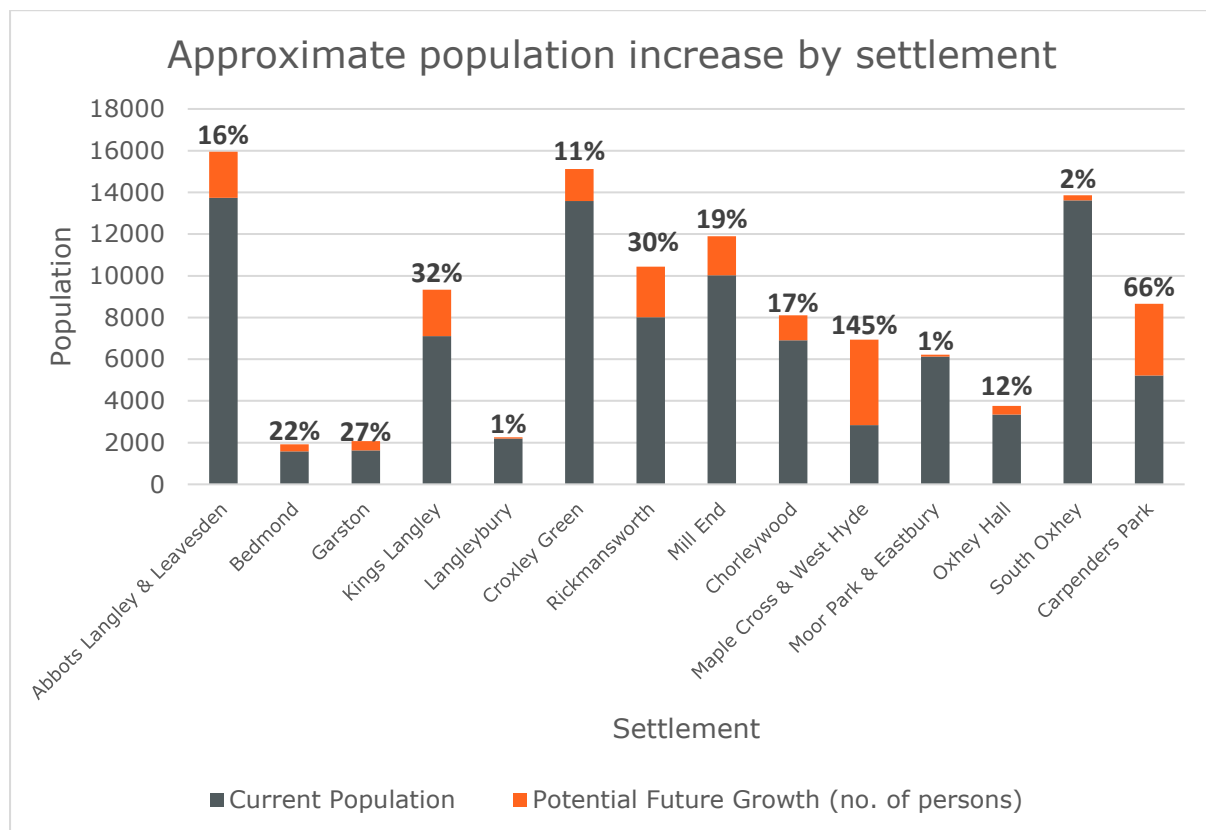
Table 6-1 provides details of the approximate percentage increase to the settlements for which there are proposed housing allocations. The estimates are based on the assumption of there being 2.3 people per new dwelling and are therefore an approximation.

Table 6-1: Approximate percentage population increase by settlement

Settlement	Potential Future Growth (indicative no. of dwellings)	Approximate Potential Future Growth (no. of persons)	Current Population	Approximate % Increase in Population at end of plan period
Abbots Langley & Leavesden*	963	2215	13737	16%
Bedmond	151	347	1575	22%
Garston	190	437	1632	27%
Kings Langley**	974	2240	7100	32%
Langleybury	25	58	2199	1%
Croxley Green	670	1541	13579	11%
Rickmansworth	1053	2422	8012	30%
Mill End	817	1879	10024	19%
Chorleywood	522	1201	6905	17%
Maple Cross & West Hyde	1783	4101	2835	145%
Moor Park & Eastbury	35	81	6132	1%
Oxhey Hall	179	412	3347	12%
South Oxhey	110	253	13613	2%
Carpenders Park	1499	3448	5212	66%

*for the purpose of this 'settlement level effects' assessment, the housing growth associated with Site CFS26c (Land to the west of the Kings Langley Estate) has been 'apportioned' to Kings Langley and not Abbots Langley & Leavesden as is the case in the Local Plan Regulation 18 Part 2 consultation and elsewhere in this SA.

**for Kings Langley the figures are based on the overall population of the settlement and not just the part that is in Three Rivers District. If the 'Three Rivers only' population were to be used it would equate to an approximate 85% increase in population. In addition, as detailed in "*" above, Site CFS26c has been 'apportioned' to Kings Langley for the purposes of this assessment, given its location adjacent to the existing built area of Kings Langley.



As can be seen from Table 6-1 the settlement which would see the largest percentage increase to its overall population over the Local Plan period is Maple Cross (145%), followed by Carpenders Park (66%). A summary of how those two settlements are likely to be affected by these levels of growth is provided below. There will also be some settlement level effects for the other towns and villages in the District, however given the lower scale of the increase to their populations compared to Maple Cross and Carpenders Park these have not been investigated at this stage of the SA.

6.3.11.1 *Maple Cross*

Maple Cross is a settlement not well served by good transport links, services or facilities, making it a Lower Super Output Area (LSOA name: Three Rivers 009D) which is one of the most deprived in the District. This situation has worsened in the period between the 2015 Index of Multiple Deprivation and the most recent index published in 2019⁶.

Whilst the scale of growth proposed in the Regulation 18 Local Plan (1,783 new dwellings) would inevitably change the character of the settlement, as well as affecting local landscapes (SA9), it would bring with it the requirement for new and improved services and facilities that would help to tackle the existing issues associated with deprivation (SA12 and SA13).

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<https://reports.instantatlas.com/legacy/report/view/a0bcf43e68524a11b96cc82611fbb445/E01023838?clear=true&from=RB2>

The new development would provide new facilities to improve the offer of services to the settlement, benefitting existing and future residents. Site EOS12.2 would result in primary education facilities (proposed as an extension to the existing primary school), a local centre (including local shops, community facilities, a nursery, care home and flexible commercial/work space), a health centre, open space, play space and improvements to bus stops, an extended bus route through the site and pedestrian and cycle routes. Off-site improvements to the existing recreation ground are also proposed.

This new development would therefore provide better transport connections, improve access to public open space and provide more local services (particularly in respect of the local centre and provision of a health centre). The growth in the settlement would also result in Maple Cross 'moving up' the settlement hierarchy to a Key Centre (currently a Secondary Centre).

An increase in population would also help to support the viability of the existing services, facilities and local businesses.

6.3.11.2 *Carpenders Park*

Over the Local Plan period Carpenders Park would see an approximate 66% increase in population through the development of 1,499 new dwellings. Whilst this level of increase could put pressure on local facilities and services it would also help to support the viability of the existing services, facilities and local businesses. The two large developments proposed for Carpenders Park (Site CFS69a: Land at Carpenders Park Farm and Site PCS47: South of Little Oxhey Lane) would provide new open space and play space for the community as well as new primary schools – which would benefit the wider community. In addition, there is a secondary school allocation (CFS11) proposed in Carpenders Park which would help to support demand for secondary education arising from the potential residential sites, whilst also helping to meet existing secondary education demand in Carpenders Park and the wider surrounding area. The potential cumulative growth in Carpenders Park along Oxhey Lane and Little Oxhey Lane may also be of a scale to support transport improvements on networks to and from the settlement.

It should be noted that Site PCS47 (South of Little Oxhey Lane) which would contribute 678 of the 1,499 dwellings is located in close proximity to South Oxhey and could therefore have more of an effect (both opportunities and pressures) on South Oxhey than on Carpenders Park. However, as South Oxhey is predicted to have a population increase of only 2% (see Table 6-1) then the level of impact/opportunity resulting from Site PCS47 is not likely to be significant.

6.4 **Whole Plan Assessment by SA Topic**

6.4.1 *Introduction*

The Local Plan will provide both development enabling policies (including site allocations) and development controlling policies.

This section provides an assessment against each SA Objective of the Regulation 18 Local Plan (Part 1 and Part 2) as whole, identifying the within-plan cumulative effects taking into account how the development controlling type elements will mitigate and/or enhance the effects likely to result from the development enabling elements of the Local Plan.

6.4.2 SA1: Biodiversity

The level of development proposed in the Regulation 18 Local Plan, along with the potential site allocations for housing, education and employment uses, will inevitably result in the need to develop on some greenfield sites in the District, with resulting effects on the biodiversity associated with those development sites taken forward and the green networks of which they may form a part. Also, once the new houses are occupied there will be increased pressure on the natural environment associated with recreational activities of new residents, as well as impacts from increased numbers of domestic pets. The recreational pressures could affect important sites for nature conservation both within and outside the District. In addition, there could be some adverse secondary effects on biodiversity as a result of increased pressure on water resources that would result from additional dwellings and enterprises in the District, when considered alongside new developments in neighbouring local authorities.

However, to act as a counter to these potential adverse effects, the proposed Potential Housing Distribution approach which is aimed at the prioritising of new development on previously developed land and in the urban areas will help to limit the amount of greenfield land required for new development and thereby reduce potential effects on biodiversity.

In addition, within-plan mitigation of any adverse effects associated with new developments (housing, employment etc.) will be provided by the development control type policies, in particular 'Preferred Policy Option 19: Green and Blue Infrastructure' and 'Preferred Policy Option 21: Biodiversity, Trees, Woodlands and Landscaping' for both of which significant positive effects have been identified against the biodiversity objective. The latter of these policies requires that development should result in a net-gain for biodiversity.

At a development site level none of the Sites for Potential Allocation have been identified as having any significant effects (either positive or negative) against the biodiversity objective. Minor adverse effects have been identified for many of the sites, mainly in relation to their current greenfield status, however these assessments do not take into account the mitigation which will be provided by the Local Plan policies, in particular the requirement for a net-gain for biodiversity.

6.4.3 SA2: Water

Over abstraction of water resources is an issue in the region, therefore providing for nearly 9,000 new dwellings over the Local Plan period would increase this pressure on water resources. The effect is likely to become more significant over time as more dwellings are built and the risk of periodic water shortages increases. New development could also result in the pollution of water courses both during construction and when developments are occupied, as well as affecting groundwater resources, particularly if the development is in a Groundwater Source Protection Zone (GSPZ). New development increases the potential for water pollution, associated with increased run-off from impermeable surfaces and the potential for sewer flooding in high rainfall events. The likelihood and level of such effects will be dependent on the specific development locations.

As a result, the SA has identified minor adverse effects against SA2: Water in relation to the proposed Housing Growth Level.

However, within-plan mitigation of any adverse effects associated with new developments (housing, employment etc.) will be provided by the development control type policies, in particular 'Preferred Policy Option 15: Flood Risk and Water Resources' and 'Preferred Policy Option 19: Green and Blue Infrastructure' for both of which significant positive effects have been identified against the water objective.

At a development site level none of the Sites for Potential Allocation have been identified as having any significant effects (either positive or negative) against the water objective, or any minor effects. Uncertain effects have been identified for many of the sites, mainly in relation to their location within Groundwater Source Protection Zones.

6.4.4 SA3: Flood risk

At a Local Plan-wide level the SA has found ‘no predicted effects’ against this objective because the level of growth proposed in the Local Plan should be able to be provided without the need to develop in areas of higher flood risk.

Where potential flood risk issues could result, within-plan mitigation of any adverse effects associated with new developments (housing, employment etc.) will be provided by the development control type policies, in particular ‘Preferred Policy Option 15: Flood Risk and Water Resources’ for which significant positive effects have been identified against the flood risk objective. To support this, several other Preferred Policy Options have been assessed as having minor positive effects against this objective.

At a site specific level potential significant adverse effects have been identified in relation to potential housing allocation site CFS60 (Affinity Water Depot, Church Street) as the River Colne flows through this site which is entirely within Flood Zone 2 and has a large area within Flood Zone 3a and 3b, posing a significant risk of flooding. A number of other housing and potential employment sites have been identified as having minor adverse effects or uncertain effects given their location partly in, or adjacent to, flood risk areas.

6.4.5 SA4: Climate Change

Making provision for nearly 9,000 new homes and 5.5ha of employment land over the Local Plan period would inevitably result in an increase in greenhouse gas emissions from energy used in the construction and occupation of new housing / employment uses and the associated activities including increases in traffic. This is recognised in the SA, with negative effects against this objective being identified for the elements which include potential proposals for housing and employment growth.

However, the prioritising of new development within the built-up urban areas as far as possible should help to reduce the need to travel and reduce the average distances travelled to access facilities. This should have a positive effect on reducing the growth of greenhouse gas (GHG) emissions from transport.

Mitigation will be provided through the policies under ‘Climate Change’ theme (Preferred Policy Options: 12 Carbon Dioxide Emissions and On-site Renewable Energy; 13 Adapting to Climate Change and Sustainable Construction; 14: Renewable and Low Carbon Energy Developments; and 15: Flood Risk and Water Resources), for which significant positive effects have been identified, as well as for policies under the ‘Transport and Connections’ theme, in particular Preferred Policy Option 26: Sustainable Transport and Travel for which significant positive effects have also been identified.

Other positive effects relating to climate change mitigation and adaptation could arise as a result of the policies under the ‘Sustainable Development’ theme.

At a site specific level no significant effects (either positive or negative) have been identified for the Sites for Potential Allocation, although some minor adverse effects have been identified for housing sites which are at a distance from services and facilities. Conversely, minor positive effects have been identified for sites which are in close proximity to services and facilities.

6.4.6 SA5: Air Quality

Transport is a key source of air pollution and so inevitably making provision for nearly 9,000 new homes and 5.5ha of employment land over the Local Plan period would contribute to background emissions through an increase in the number of vehicles on the road. This is recognised in the SA, with negative effects against this objective being identified for the elements which include potential proposals for housing and employment growth.

However, as is the case for greenhouse gas emissions, the prioritising of new development in the urban areas and at the most sustainable edge of settlement locations should help to reduce the need to travel and reduce the average distances travelled to access facilities. This should have a positive effect on reducing the growth of greenhouse gas (GHG) emissions from transport.

Mitigation will be provided through the policies under 'Environment', 'Climate Change', and 'Transport and Connections' themes, in particular 'Preferred Policy Option 17: Ground Conditions, Contamination and Pollution' and 'Preferred Policy Option 26: Sustainable Transport and Travel' for both of which significant positive effects have also been identified – with minor positive effects from several other policies under these themes.

Minor positive effects relating to air quality could also arise as a result of policies in other plan elements, for example the 'Sustainable Development' theme, with the exception of the proposed Housing Growth Level.

At a site specific level no significant effects (either positive or negative) or minor effects have been predicted for the Sites for Potential Allocation. Some uncertain effects have been identified for housing sites which are in close proximity to major roads, in particular the M25 as their location could result in air quality issues for new residents.

6.4.7 SA6: Soils

Making provision for nearly 9,000 new homes and 5.5ha of employment land over the Local Plan period would inevitably require development on some greenfield sites – with associated adverse effects on soils.

However, to act as a counter to these potential adverse effects, the Potential Housing Distribution approach, which is aimed at the prioritising of new development on previously developed land and in the urban areas will help to limit the level of soil sealing and degradation resulting from new development.

No significant effects (either positive or negative) have been identified against the soil objective, however minor positive effects have been identified for some of the development controlling policies.

At a development site level none of the Sites for Potential Allocation have been identified as having a potential significant effect (either positive or negative) against the soil objective. Minor adverse effects have been identified for many of the sites, mainly in relation to their current greenfield status and the loss of soil and agricultural land that would result. Conversely, minor positive effects have been identified for those sites which would utilise previously developed land.

6.4.8 SA7: Resource efficiency

The level of new development proposed in the Local Plan will inevitably place demands on natural resources and create additional waste, both during the construction and operation/occupancy stages.

Mitigation will be provided through the policies under 'Environment' and 'Climate Change' themes, in particular 'Preferred Policy Option 18: Waste Management and Recycling' for which significant positive effects have been identified – with minor positive effects from policies under the 'Climate Change' theme (e.g. 'Preferred Policy Option 13: Adapting to Climate Change and Sustainable Construction').

At a development site level none of the Sites for Potential Allocation have been identified as having any potential effects (positive or negative) against the resource efficiency objective.

6.4.9 SA8: *Historic Environment*

The potential new development proposed in the Regulation 18 Local Plan could result in adverse effects on heritage assets and their settings and the District's wider historic environment. The significance of the effects on the historic environment of delivering the new development and associated infrastructure will be largely dependent on the nature of any heritage assets and their settings that are associated with the sites, as well as the scale and design of the new developments relative to these. As a result, the SA has identified uncertain effects in relation to the plan elements covering housing and employment growth.

Policy Options under the 'Design and Heritage' theme will provide within-plan mitigation, particularly 'Preferred Policy Option 25: Heritage and Historic Environment' for which significant positive effects have been identified as this policy aims to protect and enhance all aspects of the historic environment in the District, including heritage assets, listed or locally important buildings, conservation areas, historic parks and gardens and archaeological assets. Other plan policies will support this through minor positive effects that have been identified (e.g. 'Preferred Policy Option 14: Renewable and Low Carbon Energy Developments' which requires that the impact on the local historic environment be taken into consideration for applications for renewable energy developments).

At a site specific level, none of the Sites for Potential Allocation have been identified to have any potential significant effects (either positive or negative), but many have some associated or nearby heritage assets that will need to be taken into consideration during the planning application process – as a result minor adverse effects or uncertain effects have been identified for many of the sites.

6.4.10 SA9: *Landscape and Townscape*

Making provision for nearly 9,000 new homes and 5.5ha of employment land over the Local Plan period would inevitably result in effects on the local landscapes and townscapes in those areas where new development takes place. This could have the potential to result in adverse effects on the local and wider landscapes, such as the setting of the Chilterns AONB. This is recognised in the SA, with negative effects against this objective being identified for the plan elements which include proposals for the housing and employment growth.

However, to act as a counter to these potential adverse effects, the Potential Housing Distribution approach, which is aimed at the prioritising of new development on previously developed land and in the urban areas will help to limit the amount of open land which will be required to meet the housing and employment targets, thereby reducing levels of adverse effects on local landscapes.

Significant positive effects have been identified in relation to this objective for 'Preferred Policy Option 20: Landscape Character' which protects against development in the Chilterns AONB and requires that all developments make a positive contribution to the landscape and for 'Preferred Policy Option 23: Local Distinctiveness and Place Shaping' which seeks to enhance the local townscape through high quality design. Significant positive effects have also been identified for 'Preferred Policy Option 25:

Heritage and Historic Environment’ as it would reserve local character by protecting heritage assets and landscape features. A range of minor positive effects have also been identified for policies across a wide range of the Regulation 18 Local Plan themes.

At a site specific level, none of the Sites for Potential Allocation have been identified to have any significant effects on landscape/townscape (either positive or negative), however minor adverse effects have been identified for the sites on open land, particularly where development would encroach into open countryside or erode gaps between settlements. Uncertain effects have been identified for many of the sites on previously developed land, where redevelopment may improve the local landscape/townscape.

6.4.11 SA10: Health and Wellbeing

Overall, the predicted impacts of the plan should have positive impacts against the objective to improve the health and wellbeing of the local population. This is achieved through policies which support the provision and improvements to housing, healthcare, education, the environment and facilities for leisure and recreation.

Significant positive effects have been identified in relation to ‘Preferred Policy Option 10: Social and Community Facilities’ and ‘Preferred Policy Option 11: Health and Wellbeing’ as these policies support the provision of new open space, sport and recreation facilities and active travel infrastructure which will make a significant positive contribution to residents’ health and wellbeing. Significant positive effects have also been identified in relation to ‘Preferred Policy Option 22: Open Space, Play Space, Sport and Recreation’ which would protect against the loss of facilities and support the provision of new facilities to aid sport and recreation activities which support a healthy lifestyle.

In addition, minor positive effects have been identified for other policies which would improve the built and natural environments, as well as access to the natural environment, or which would enable/improve the use of healthy travel modes (i.e. walking and cycling), although on the latter the effects will be dependent on the behavioural change necessary to result in a take-up of active travel modes.

At a site-specific level, none of the Sites for Potential Allocation have been identified to have any significant effects (either adverse or positive) against the Health & Wellbeing objective. Minor positive effects have been predicted for those sites which are in close proximity to open space or which would provide new open space, whilst uncertain effects have been identified for sites which could suffer from noise or air quality issues due to their proximity to major roads.

6.4.12 SA11: Sustainable Locations

Significant positive effects against the Sustainable Locations objective have been forecast in relation to the Potential Housing Distribution approach as the prioritising of new development in built-up urban areas should reduce the need to travel, as a large proportion of residents would be close to key services and facilities.

Additional minor positive effects have also been predicted for a wide range of other policies, including, amongst others: ‘Preferred Policy Option 3: Housing Density’ which supports highest density housing at sites which are well served by public transport and close to services and facilities; ‘Preferred Policy Option 7: Employment and Economic Development’ which gives priority to developments in sustainable locations, accessible by foot or public transport from existing settlements; and ‘Preferred Policy Option 26: Sustainable Transport and Travel’ as improving provision of public transport and sustainable travel infrastructure will make developments in the District more accessible.

No adverse effects have been identified in relation to the proposed policies.

For 'Preferred Policy Option 16: Green Belt' the effects are uncertain given that residential developments in land removed from the Green Belt will result in people travelling further for work and leisure purposes which could increase reliance on the car. The impact is dependent on a public transport system being in place to connect new developments to the main settlements.

At a site-specific level, none of the Sites for Potential Allocation have been identified to have any significant effects (either positive or negative) in relation to the Sustainable Location objectives. As was the case for SA4 Climate Change some minor adverse effects have been identified for housing and employment sites which are at a distance from services and facilities. Conversely, minor positive effects have been identified for housing sites which are in close proximity to services and facilities.

6.4.13 SA12: Community Cohesion

The predicted effects of the plan against the community cohesion objective are largely positive. The plan includes policies which would improve access to housing, education, facilities, public transport and would improve quality of life in the District whilst helping to reduce deprivation, where it exists.

Significant positive effects have been identified for 'Preferred Policy Option 10: Social and Community Facilities' and 'Preferred Policy Option 11: Health and Wellbeing' as these policies seek to protect existing social, cultural and community facilities, alongside the provision of enhanced facilities which will be significantly positive for community cohesion.

Additional minor positive effects have also been predicted for a wide range of other policies, including, amongst others: 'Preferred Policy Option 2: Housing Mix and Type' which aims to build mixed communities by providing a mix of affordable, specialist and supported accommodation in addition to a mix of tenures and types of housing; and 'Preferred Policy Option 22: Open Space, Play Space, Sport and Recreation' as the provision of new open space and play space at new developments would be beneficial to local communities.

No adverse effects have been identified in relation to the proposed policies.

For the housing growth element of the plan the effects are uncertain given that making provision for nearly 9,000 new homes over the Local Plan period could result in a cumulative impact by adding pressure on community infrastructure across the District. Conversely, the level of housing growth should result in increased levels of developer contributions which could result in an increased provision of health, education, recreation and community facilities, as well as supporting the viability of existing services and facilities. Effects will vary between area and will also depend on the levels of new infrastructure provided as part of new developments.

At a site specific level, none of the Sites for Potential Allocation have been identified to have any significant effects (either positive or negative) against the Community Cohesion objective, however minor positive effects have been identified for sites close to community facilities and for sites which would provide new community facilities. No minor adverse effects were identified at a site level.

6.4.14 SA13: Housing

Significant positive effects have been predicted in relation to 'Preferred Policy Option 2: Housing Mix and Type', 'Preferred Policy Option 3: Housing Density' and 'Preferred Policy Option 4: Affordable Housing' which ensure that there is a suitable range of types, styles, design and tenure mix to support needs of different groups.

In addition, minor positive effects have been identified for some other policies, including: Preferred Policy Option 5: Provision for Gypsies, Travellers and Travelling Showpeople' as allocation of additional traveller sites and safeguarding of existing sites will ensure that the needs of the travelling community are met; 'Preferred Policy Option 6: Residential Design and Layout and Accessible and Adaptable Buildings' which contributes towards providing affordable and accessible housing in the District; 'Preferred Policy Option 16: Green Belt' which, in special circumstances, would allow residential development to support agricultural and forestry workers; and 'Preferred Policy Option 23: Local Distinctiveness and Place Shaping' which supports high quality design of housing.

The proposed Housing Growth Level is identified as having mixed effects against the housing objective. Whilst this policy supports the provision of nearly 9,000 new homes which will contribute to the District's housing need, the level of housing proposed does not fulfil the District's Objectively Assessed Need for housing over the plan period.

At a site specific level, significant positive effects have been identified in relation to those potential housing allocation sites which have a capacity to support 500 or more dwellings and therefore make a significant contribution towards providing new housing for the District. Minor positive effects have been identified for all housing sites with a dwelling capacity below 500.

The proposed policy on housing allocations in Part 2 of the Regulation 18 Local Plan is also identified as having a significant positive effect on the housing objective.

6.4.15 SA14: Economy and SA15 Employment

The SA has predicted that the Regulation 18 Local Plan would have positive cumulative effects on economic factors. The plan supports the objectives to achieve sustainable levels of prosperity and economic growth and to ensure local residents have access to employment opportunities and training. The plan would enable economic growth in the District by retaining and adding to dedicated employment sites and by enabling appropriate retail and leisure developments in accessible locations which will stimulate the local economy and ensure the viability and vitality of local centres within the District are maintained.

Significant positive effects have been predicted for both of the economic related SA objectives (SA14 and SA15) in relation to 'Preferred Policy Option 7: Employment and Economic Development' and 'Preferred Policy Option 8: Warner Bros. Studios at Leavesden' as these policies contribute to overall employment levels in a diverse range of jobs, in areas accessible to public transport and with mixed use development which would have a significant positive effect on economic growth in the area.

In addition, minor positive effects have been against SA14 and SA15 for other policies, including: 'Preferred Policy Option 9: Retail and Leisure', as through the protection and enhancement of town, district and local centres the policy will help to encourage retail and associated development uses which are appropriate to the scale and function of these centres and which will help to support the vitality of the local economy. Increased development in centrally located and accessible areas will allow the District to grow sustainably. Increasing retail and leisure options within the settlements will help the viability and vitality of local centres; and the policies under the 'Transport and Connections' theme, as measures to maximise the use of active travel modes and public transport should improve the quality of the urban environment thereby supporting the local economy. Reducing congestion should also be beneficial for local businesses as deliveries, customers and employees are less likely to face transport delays. 'Policy Option 28: Deliveries, Servicing and Construction' requires that delivery and servicing arrangements be made for all new developments. This will allow for efficient movement of goods and will increase business efficiency for companies making deliveries.

At a site-specific level, significant positive effects have been identified in relation to Warner Bros Studio at Leavesden expansion sites CFS28 and OSPF6 given the importance of the studio to the local and national economy. These sites would allow expansion of the studio which would contribute significantly to the growth of the creative industry in the District. The existing employment site E(d) Maple Cross/Maple Lodge is also identified as having significant positive effects against these objectives due to its spare capacity of approx. 18,000sqm/5ha of industrial floorspace.

6.5 Cross-boundary effects

The effects resulting from housing, employment and other associated growth within Three Rivers will not just be restricted to the District, but some effects could also be felt in neighbouring local authority areas - for example through an increase in traffic or through increased pressure on infrastructure and natural resources with their associated environmental and social impacts.

One specific area of the District where this could particularly be the case is Kings Langley which is partly in Three Rivers District and partly in Dacorum Borough. Any new development in Three Rivers could have effects on the services and facilities which are located in the Dacorum area of the village.

Another potential topic where cross-boundary effects could result is the water environment. Due to the inter-connected nature of the water environment which links many rivers, streams and groundwater, any negative effects on water resources could also be felt in the surrounding areas.

A number of pieces of technical work have been undertaken jointly with other authorities to ensure that cross-boundary issues are assessed, for example employment, Green Belt review, open space, sport and recreation, strategic flood risk assessment (Level 1) and housing studies.

6.6 Difficulties Encountered in Undertaking the Assessment

Given the strategic nature of many of the elements of the Regulation 18 Local Plan and the uncertainty in terms of the actual effects that might result from the implementation of the Local Plan policies, there is some uncertainty as to the direction and significance of some 'Policy v. SA objective' relationships. Professional judgement has been used to predict the nature of likely effects and their potential significance. However, a range of uncertainties in the assessment remains and where these uncertainties relate to potentially significant effects, monitoring will be required. The requirement for monitoring will be addressed in the SA Report for the Publication Local Plan – at the Regulation 19 stage.

Whilst the Local Plan can provide the framework for seeking to achieve sustainable development, much will be dependent on whether there are the requisite behavioural changes needed to achieve this goal. For example, the Local Plan can require the integration of sustainable transport measures as part of new development; however, the success of such a requirement is entirely dependent on people changing travel behaviours to make use of such measures. Such a factor means that the SA can never be entirely accurate in the predictions of effects.

6.7 Mitigation and Recommendations

6.7.1 Introduction

A key role of the SA is to provide recommendations as to how the sustainability performance of a plan can be improved. The Regulation Local Plan includes a range of proposed policies that seek to prevent and where possible enhance the environment and overall sustainability of development.

The SA has built on this by identifying a range of recommendations as to how the Local Plan can maximise its performance against the range of sustainability topics. Some of these recommendations seek to mitigate potential adverse effects, whilst others look to build on some of the opportunities that are provided by the District's natural environment.

6.7.2 *Mitigation*

The assessments of the Regulation 18 Local Plan Part 1 in Appendix E have been undertaken on a 'policy by policy' basis, seeking to identify the effects of each policy in isolation – i.e. without considering the potential mitigation and/or enhancements of effects that are included in other policies. As a result many of the potential adverse effects identified in the 'development enabling' plan elements such as the proposed level of housing growth and 'Preferred Policy Option 7: Employment and Economic Development' should be avoided or mitigated by the requirements set out in Preferred Policy Options under the plan themes of 'Sustainable Development'; 'Housing'; 'Employment'; 'Social and Community Facilities / Health and Wellbeing'; 'Climate Change'; 'Green Belt'; 'Environment'; 'Green Infrastructure'; 'Design and Heritage'; and 'Transport and Connections'.

The specific policies which will mitigate potential adverse effects by SA topic area are identified in the relevant sections of the 'Whole Plan Assessment by SA Topic' which is included in Section 6.4.

6.7.3 *Recommendations*

During the development of the Regulation 18 Local Plan the SA team have provided a wide range of suggestions and recommendations as to how the policies and supporting text for the Plan could be updated to fill some gaps and to improve the robustness and clarity of the Plan's requirements. This has taken place at various stages, from initial policy development through to finalisation of the Local Plan Regulation 18 consultation.

In addition there are some further recommendations which have been identified for the Council's consideration when the Plan is being updated for the Publication stage. These are in relation to the Local Plan's objectives and preferred policy options, as follows:

- Objective 3 Ensure that new development prioritises and makes best use of previously developed brownfield land (PDL)
 - Whilst this is a good objective to have, given that there is a limited supply of previously developed land in the District, the headline objective would benefit from being expanded so it also refers efficient use of land.
- Objective 4 Ensure that necessary infrastructure and services are integrated within new developments where appropriate.
 - Whilst it is realised that the list of services in the supporting text is not an exhaustive list, it would benefit from also referring to 'community facilities' or 'leisure and recreation'.
- Objective 9 Continue to tackle climate change and reduce the impacts on the environment by encouraging reductions in carbon emissions, waste, pollution, energy and water consumption and promoting the use of renewable energy and sustainable building materials.
 - This objective encompasses a wide range of issues and would benefit from being structured to reflect this, perhaps by having sub-objectives (or supporting text) to cover the topics of Climate change mitigation; Climate change adaptation; resource use; and environmental pollution.

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- Objective 10 Provide opportunities for leisure, arts, sport and recreational activities within the District.
 - The supporting text would benefit from some text covering the “arts” – as referred to in the headline objective.
 - Objective 15 Health and Wellbeing.
 - The headline objective would benefit from being clearer as to what it is aiming to achieve. For example “Improve the health and wellbeing of all Three Rivers’ communities and reduce health inequalities”.
 - Preferred Policy Option 9: Retail and Leisure
 - In relation to point 5f), any retail/leisure development in an out of centre location would inevitably result in some increased private vehicle use and therefore preclude any such developments taking place without contravening policy. This section of the policy would therefore benefit from an update to recognise that some private vehicle use is inevitable, but whilst still aiming to keep such an increase as low as possible.
 - Point 7 would benefit from some clarification as to how losses would be dealt with by the policy. Currently the paragraph is concentrated on how ‘gains’ would be considered, but not ‘losses’.
 - Point 9 could be expanded to also cover frontages and displays associated with the leisure developments .
 - In relation to point 10 and point 11 would there be an issue if one large new supermarket or non-food retail store uses up a whole 5 year target - just in one location? The policy would benefit from some clarification on this issue.
 - Preferred Policy Option 11: Health and Wellbeing
 - The policy would benefit from additional policy text covering issues/topics which are included in the supporting text “Why is this the Preferred Policy Option?”, for example the areas covered by the ‘Hertfordshire Health and Wellbeing Planning Guidance Document (2017)’. Alternatively that document could be cross-referenced in the policy text. For example, a fourth point to the policy could be added encouraging developers/applicants to incorporate the Design Element recommendations from the Hertfordshire Health and Wellbeing Planning Guidance Document (2017) into development proposals.
 - Preferred Policy Option 12: Carbon Dioxide Emissions and On-site Renewable Energy
 - To avoid confusion with other Local Plan policies which also address CO₂ emissions (e.g. Preferred Policy Option 26: Sustainable Transport and Travel), as this policy is restricted in scope to built-development it would be clearer for the policy title to reflect this – for example if the title were to read “Energy efficiency and On-site Renewable Energy”.
 - Preferred Policy Option 14: Renewable and Low Carbon Energy Developments
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- The policy would benefit from being structured and worded as per the version agreed at the August 2019 Local Plan Sub-Committee⁷.
- Preferred Policy Option 17: Ground Conditions, Contamination and Pollution
 - With regard to the “*must fully assess such impacts*” text in point 7, the Plan would benefit if this principle was also applied to the Air Quality (point 4) and Lighting (point 5) elements of this policy.
- Preferred Policy Option 22: Open Space, Play Space, Sport and Recreation
 - Under point 7 ii), the exclusion relating to specialised accommodation for the elderly could result in the such accommodation having no access to green space/gardens which could play an important role for overall wellbeing of residents. The policy would benefit from further clarification on this issue in order that the residents of this type of accommodation are not disadvantaged in relation to such access.
- Preferred Policy Option 25: Heritage and Historic Environment
 - Point 4 (editorial) – the second reference to “significance” is superfluous.
 - Point 14 would benefit from requiring the ‘setting’ of Locally Important Buildings to also be taken into account.
- Preferred Policy Option 26: Sustainable Transport and Travel
 - Point 1 would benefit from being expanded to also refer to new and future sustainable modes of transport, for example electric scooters.
 - The supporting text for Policy 26 makes reference to safeguarding land for HS2. It would be beneficial to include this within the policy.

It is anticipated that further input and recommendations are provided through the SA process following the consultation on the Regulation 18 Local Plan, through further assessment work and by taking into consideration responses received to the consultation.

6.8 Monitoring

The SEA Directive requires that the significant environmental effects of implementing a plan are monitored so that appropriate remedial actions can be taken if required.

The monitoring put in place needs to fulfil the following requirements:

- To monitor the significant effects of the plan;
- To monitor any unforeseen effects of the plan;
- To ensure that action can be taken to reduce / offset the significant effects of the plan; and
- To provide baseline data for the next SA/SEA and to provide a picture of how the environment / sustainability criteria of the area are evolving.

⁷ <https://www.threerivers.gov.uk/meeting/local-plan-sub-committee-thursday-8-august-7pm>

The SEA Directive (Article 10 (1)) allows for existing monitoring arrangements to be used if appropriate. Monitoring may cover several plans or programmes as long as sufficient information about environmental effects is provided for the individual plans or programmes.

At this stage of the Local Plan and SA processes there is uncertainty about the number and the nature of significant or uncertain effects that may result from the implementation of the Local Plan and therefore monitoring measures are not proposed at this stage.

A draft framework of monitoring measures will be introduced in the SA Report to accompany the Regulation 19 Local Plan, with the final framework being included in the SA Statement which will be produced at the Plan Adoption stage.

6.9 How the SA has influenced the Plan

To date the SA has had a range of influences on the development of the Local Plan. Close liaison between the planning officers and SA consultants since the scoping stage in 2017 has meant that the SA has provided input at several stages during the development of the Local Plan.

When the Local Plan is adopted it will be accompanied by an SA Adoption Statement which will need to describe how the Local Plan has been influenced by the SA. Influences to date include the following:

- Production of the SA Scoping Report identified issues that the Local Plan needed to help address. The information within the Scoping Report also contributed to the Local Plan evidence base;
- Contributions to the development of the Issues and Options paper during its preparation prior to consultation in summer 2017;
- Production of an SA Working Note to accompany the consultation on the I&O paper;
- Input into the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA). This was a key early input from the SA process as it ensured that the methodology used by TRDC was aligned with the SA Framework at a level appropriate to the early consideration of site options. It also avoided unnecessary duplication of work between the plan making and SA activities, as the SA has drawn from information in the SHELAA rather than having to unnecessarily undertake separate evidence gathering;
- Production of an SA Working Note to accompany the consultation on the Potential Sites;
- Undertaking assessments of the potential sites for inclusion in the Regulation 18 Local Plan Part 2;
- Provision of on-going input in relation to the development of the Regulation 18 Local Plan and its detailed policies and sites; and
- Assessment of the emerging Regulation 18 Local Plan and providing recommendations for additions and changes.

The SA will continue to inform the development of the Local Plan through the future stages of Publication, Submission and Examination.

7 Conclusions and Next Steps

7.1 Conclusions and Recommendations

The Preferred Policy Options and Sites for Potential Allocation in Parts 1 and 2 of the Regulation 18 Local Plan have been assessed against the SA Objectives that were developed during the scoping stage of the SA process. In addition, the proposed Local Plan Vision and Objectives have been assessed for their compatibility with the SA objectives.

The SA has found that overall the Regulation 18 Local Plan performs well in relation to the SA objectives, particularly the social and economic objectives through the provision of new homes and employment development although the level of housing growth proposed falls short of meeting the District's objectively assessed needs, thereby reducing the level of positive effects against the housing objective (SA13) than if the need were to be fully met.

Whilst the level of growth proposed in the Local Plan will inevitably require new development on greenfield sites in the Green Belt, with associated adverse effects and pressures on the natural and historic environment, by maximising the levels of development in the existing urban areas the amount of greenfield land needed will be minimised, thereby reducing the scale of these effects. The Sites for Potential Allocation which are located within or at the edge of existing sustainable settlements and which may come forward for development in the future would also help to reduce adverse effects, particularly those relating to transport related issues.

The requirements of the topic specific proposed policies in the Regulation 18 Local Plan (e.g. Preferred Policy Option 21: Biodiversity, Trees, Woodlands and Landscaping) will provide many of the mitigation and enhancement measures to improve the overall sustainability performance of the Local Plan.

7.2 Next Steps

Following the Regulation 18 consultation the SA will provide input during the development of the Preferred Options document further work will be undertaken by the Council to develop the Regulation 19 Publication version of the Local Plan, taking into account feedback received through the Regulation 18 consultation. As with all previous stages this process will be informed by the ongoing SA.

When the Local Plan is published at the Regulation 19 stage, planned for late-2021, it will be accompanied by a full SA Report (with a Non-Technical Summary) which will provide a detailed assessment of all the proposed policies and sites in the Publication document and which will fully meet the requirements for an Environmental Report as specified by the SEA Regulations. The SA Report will build on feedback received through the Regulation 18 consultation as well as the additional evidence base studies that are currently being undertaken.

Abbreviations used

AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
CIL	Community Infrastructure Levy
DPD	Development Plan Document
FZ	Flood Zone
GHG	Greenhouse Gas
GI	Green Infrastructure
GSPZ	Groundwater Source Protection Zone
HRA	Habitats Regulations Assessment
I&O	Issues and Options
LB	Listed Building
LDD	Local Development Document
LNR	Local Nature Reserve
LWS	Local Wildlife Site
NPPF	National Planning Policy Framework
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SHELAA	Strategic Housing and Economic Land Availability Assessment
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
TPO	Tree Protection Order