



Three Rivers District Local Plan
Regulation 18 Part 4 Consultation
Sustainability Appraisal Briefing Note

September 2023

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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 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.

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.

Independent consultants TRL Ltd have been appointed by Three Rivers District Council to undertake the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) in support of the new Local Plan. This has resulted in the production of an SA Scoping Report (May 2017, updated July 2017); an SA Working Note to accompany the Issues and Options consultation (July 2017); an SA Working Note to accompany the 'Potential Sites for Consultation' (October 2018, updated July 2019); an Initial SA Report alongside the Local Plan Regulation 18 consultation (June 2021); and an SA Working Note to accompany the 'Additional Sites for Potential Allocation' (January 2023). These SA documents are available at the following weblink:

<https://www.threerivers.gov.uk/egcl-page/new-local-plan>

1.2 This Briefing Note

This short SA Briefing Note (September 2023) is a focused document, which provides an initial assessment of the elements of the Part 4 consultation which have not previously undergone sustainability appraisal, to inform the decisions of the Part 4: Three Rivers' Preferred Local Plan Lower Housing Growth Option Protecting More Green Belt Land'.

It will be followed in October 2023 by an SA Working Note that will provide a more comprehensive assessment of the Part 4 Local Plan. That Working Note will add to the information provided in the Initial SA Report (June 2021) and the SA Working Note (January 2023) and will contribute to the ongoing plan-making process, by providing an independent assessment of the emerging Local Plan, with a view to guiding the next stage of its development. Sustainability Appraisal is a decision aiding tool rather than a decision making one and the contents of the SA documents should therefore be considered in this light.

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

This SA Briefing Note provides assessments for the following:

The format of this briefing paper is as follows:

- Section 1: Introduction;
- Section 2: Brief details on the SA methodology.
- Appendix A – Assessment of the ‘Low Growth’ option.
- Appendix B of new and amended sites.

2 Methodology

For the Local Plan options an assessment has been undertaken, with each ‘Policy/Site option v. SA objective relationship’ being ‘scored’ using the significance criteria shown in Figure 2-1. The assessment scoring is supported by a brief assessment commentary to provide the rationale behind the scores allocated.

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/SEA objective
–	Neutral – The option is unlikely to impact on the SA/SEA objective
✗	The option is likely to have a negative effect which is not significant
✗✗	The option is likely to have a significant negative effect
✓/✗	The option is likely to have some positive and some negative effects, none of which are significant

Figure 2-1: Significance criteria

2.1 SA Framework of Objectives

Informed by the issues identified, a framework of SA/SEA objectives has been developed covering a range of environmental, social and economic topics.

The main objectives (shown in Table 2-1) are supported by a series of sub-objectives and site-specific questions, which provide greater detail on the issues to consider during the assessments. These SA objectives will be used to structure and inform the assessment of the Local Plan through all stages of its development.

Table 2-1 SA Framework of Objectives

The SA/SEA Objectives against which the options have been assessed are as follows:	
SA1	To protect, maintain and enhance biodiversity and geodiversity at all levels
SA2	To protect, maintain and enhance water resources (including water quality and quantity)
SA3	To reduce flood risk
SA4	Reduce greenhouse gas emissions and adapt to the effects of climate
SA5	Achieve good air quality, especially in urban areas
SA6	Make efficient use of land and protect soils
SA7	To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible
SA8	To identify, maintain and enhance the historic environment and heritage assets
SA9	To conserve and enhance landscape and townscape character and encourage local distinctiveness
SA10	To improve the health and wellbeing of the local population
SA11	To develop in sustainable locations
SA12	To improve community cohesion through reducing inequalities, promoting social inclusion and reducing crime and the fear of crime
SA13	Ensure that everyone has access to good quality housing that meets their needs
SA14	Achieve sustainable levels of prosperity and economic growth
SA15	To ensure local residents have employment opportunities and access to training

Appendix A Housing Growth Assessment

The table below provides an assessment of the ‘Low Growth’ option of 270 dwellings per annum over the 18 year Local Plan period. 4,852 dwellings total.

This assessment is based on the growth level ‘per se’, as has been the case with previous assessments of growth levels, and does not consider the effects relating to specific site allocations.

SA objective	Nature of Effect	Significance of Effects
1. Biodiversity	<p>Development of some greenfield land that would be required to deliver this level of growth could have adverse impacts on habitats and species. These effects will be dependent on the location and biodiversity characteristics of the sites to be developed – although it should be noted that new development would be required to deliver a net-gain in biodiversity.</p> <p>However, when compared to higher levels of growth the ‘Low Growth’ option should have a more minor level of adverse effects – although conversely it could also result in fewer biodiversity enhancement opportunities that might come with larger strategic sites that would be needed to deliver the higher growth levels.</p>	x
2. Water	<p>Providing 270 dpa would put some additional pressure on water resources and which could cause issues with potable water supply. The effect is likely to become more significant over time as more dwellings are built and risk of periodic water shortages increase.</p>	x
3. Flood risk	No predicted effects	-
4. Climate Change	<p>Making provision for nearly 5,000 new homes 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. However these effects would be less than those resulting from higher growth levels.</p>	x
5. Air Quality	<p>Making provision for nearly 5,000 new homes over the Local Plan period would inevitably contribute to background emissions through an increase in the number of vehicles on the road. However these effects would be less than those resulting from higher growth levels.</p>	x

6. Soils	This level of growth will require development on greenfield sites with associated soil sealing. Any development that takes place on previously developed land will help to reduce the adverse effects. Any adverse effects would be less than those resulting from higher growth levels.	x
7. Resource efficiency	Any level of growth would result in resource use in construction and waste generation once the dwellings are occupied, although the Low Growth option would have reduced levels of effects compared to the higher growth options.	x
8. Historic Environment	Effects on the historic environment will be dependent on the specific locations taken forward for development and the design of new developments.	?
9. Landscape/ Townscape	This level of growth would require development on greenfield sites which could have associated adverse effects on local landscapes, tranquillity and light pollution. However these effects would be less than those resulting from higher growth levels.	x
10. Health and Wellbeing	The number of new dwellings proposed under this option would fall well short of meeting the OAN and as a result health and wellbeing issues related to a lack of appropriate housing could be exacerbated (e.g. through overcrowding and stress related to inadequacy of housing provision).	?
11. Sustainable Locations	No predicted effects	-
12. Community cohesion	This level of growth may provide limited opportunities for new community facilities to come forward as a result of developer contributions, and from strategic sites, and could reduce the viability of existing facilities and services. This would have the greatest effect on those without access to private transport. Conversely this Low Growth level would put less strain on existing services and infrastructure.	?
13. Housing	This level of housing would meet only 42% of the District's objectively assessed need. This would have major implications for the supply of affordable housing, of which there is a large shortage.	xxx
14. Sustainable prosperity	Housing growth will help support the local economy, although the effect will be lower than would be the case for higher levels of housing growth.	✓
15. Employment and skills	The level of new dwellings provided under this option could limit the opportunities for people to stay living in the area and benefit from the planned expansion of jobs in the District.	?

Appendix B New Site and Amended Site Assessments

B.1 Introduction

This appendix includes the assessments of:

Additional new sites (NSS sites) which have been put forward following the Part 3 Regulation 18 consultation:

- Site Ref. NSS20: Land adj. RES site, Egg Farm Lane, Kings Langley
- Site Ref. NSS22: Lonsdale, 19 Hyde Lane, Kings Langley
- Site Ref. NSS18: Catlips Farm, Berry Lane, Chorleywood
- Site Ref. NSS23: Chorleywood Telephone Exchange, Shire Lane, Chorleywood *
- Site Ref. NSS21: Land between Adams House and Five Oaks, Batchworth

Previously assessed sites which have been amended, as follows:

- Site Ref. H9: 33 Baldwins Lane, Croxley Green *
 - Site would provide 10 dwellings, not 59 as specified (in error) in the Part 2 consultation.
- Site Ref. EOS7.0: Land to the south of Shepherds Lane and west of M25, Mill End *
 - No change in site area but proposed number of dwellings reduced from 760 to 550.
- Site Ref. CFS18c (formerly CFS18b): Hill Farm, Stag Lane, Chorleywood *
 - Reduction in site area compared to CFS18b and proposed number of dwellings reduced from 228 to 38.
- Site Ref. EOS12.4 (formerly EOS12.2): Land to the west and south of Maple Cross (combined sites) *
 - Reduction in site area compared to EOS12.2 and proposed number of dwellings reduced from 1,500 to 850.

The amendments to the assessments for the four previously assessed sites are shown using strikethrough and bold text.

The sites which are proposed for allocation in the Part 4 Local Plan are denoted by the symbol "*"

For consistency with previous SA reports for site assessments the sites are ordered by settlement and not by site number.

B.2 Housing

B.2.1 Kings Langley

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	Explanatory Comments
Site Ref: NSS20 Land adj. RES site, Egg Farm Lane, Kings Langley	x	-	-	✓	?	✓ /x	-	?	x*	?	✓	?	✓	-	-	<ul style="list-style-type: none"> ✗ The majority of this site is made up of greenfield land with Local Wildlife Sites to the north and east of the site and TPOs on the edge of the site (SA1). The majority of the development would be in open countryside (SA9). ✓/✗ The site is made up of a mix of greenfield and previously developed land (SA6). ? The site contains listed buildings which could be affected by the development (SA8). The site is in very close proximity to the M25 which could result in air quality and noise issues for residents of the new housing (SA5 & SA10). Development may disrupt the public right of way which runs along the northern boundary of the site (SA10). The site is some distance from open space and there is uncertainty as to whether new open space and other community infrastructure would be provided (SA12). ✓ Whilst the site is some distance from services and facilities it is close to a railway station (SA4 & SA11). The site would deliver 350 new dwellings (SA13). * Landscape Sensitivity Assessment outstanding
Site Ref: NSS22 Lonsdale, 19 Hyde Lane, Kings Langley	x	-	-	x	-	x	-	-	?*	x	x	x	✓	-	-	<ul style="list-style-type: none"> ✗ The majority of this site is made up of undeveloped land (SA1 and SA6). The site is at some distance from local services and facilities (SA4 & SA11) as well as open space (SA10 and SA12). ? Effects on landscape are uncertain (SA9). ✓ The site would deliver 47-79 new dwellings (SA13). * Landscape Sensitivity Assessment outstanding

B.2.2 Croxley Green

Site Ref: H9 33 Baldwins Lane *	-	?	?	✓	-	✓	-	-	?	?	✓	✓	✓	?	?	<p> ? The site is in GSPZ1 which risks contamination to the groundwater source (SA2) and there is high risk of surface water flooding to the north of the site (SA3). The redevelopment of the car sales unit may improve the local townscape (SA9). Noise and vibration from the railway line close to the west of the site may have adverse effects on residents' wellbeing (SA10). The site is currently in use as a car-sales centre, loss of this may cause job losses (SA14 & SA15). </p> <p> ✓ The site is located close to services and facilities including a bus stop (SA4 & SA11) and makes use of previously developed land (SA6). The development is close to open space and play space (SA10 & SA12) and would deliver 59 10 new dwellings (SA13). </p>
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B.2.3 Mill End

Site Ref: EOS7.0 Land to the south of Shepherds Lane and west of M25 *	x	?	-	✓	?	x	-	?	x	?	✓	✓	✓	-	-	<p> x The site is greenfield and has biodiversity value and there are TPOs in place in the south-west and north-west parts of the site (SA1) and is currently in use as agricultural land (SA6). The area is of medium-high sensitivity to built development (SA9). </p> <p> ? The site is in a GSPZ1 which risks contamination to the groundwater source (SA2) and is in close proximity to the M25 which could result in air quality and noise issues for residents of new housing and a public right of way runs along the northern boundary (SA5 & SA10). Heronsgate Conservation Area is located to the south-west but is separated from the site by the M25, although the site has potential to include heritage assets of archaeological interest (SA8). </p> <p> ✓ The site is in close proximity to local facilities and services including a bus stop (SA4 & SA11), open space and a play area (SA10) and the development would include a new primary school (SA12). </p> <p> ✓✓ The development would deliver 760 550 new dwellings (SA13). </p>
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B.2.4 Chorleywood

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	Explanatory Comments
Site Ref: NSS18 Catlips Farm, Berry Lane, Chorleywood	x	-	-	x	?	x	-	-	x*	?	x	✓	✓	-	-	<p>x The majority of this site is made up of greenfield land with a woodland part of the site being a Local Wildlife Site (SA1). The land is currently in use for agriculture (SA6). Development would be in open countryside (SA9). The site is at some distance from local services and facilities (SA4 & SA11).</p> <p>? The site is in very close proximity to the M25 which could result in air quality and noise issues for residents of the new housing (SA5 & SA10). Development would affect the open space which forms part of the site (SA10).</p> <p>✓ Development would provide new open space and community facilities and deliver 300 new dwellings (SA13).</p> <p>* Landscape Sensitivity Assessment outstanding</p>
Site Ref: NSS23 Chorleywood Telephone Exchange, Shire Lane, Chorleywood *	-	-	-	✓	-	✓	-	?	?*	-	✓	-	✓	?	?	<p>? Development could affect the setting of the Chorleywood Station Conservation Area (SA8). Development could improve the local townscape (SA9). The site was formerly in use as a telephone exchange (Class B1 and B2), so there is some uncertainty as how the change of use to residential could affect the local economy and jobs (SA14 & SA15).</p> <p>✓ The site is located in close proximity to services and facilities as well as bus stops and railway station (SA4 & SA11). The site is on previously developed land (SA6). Development would deliver approximately 15 new dwellings (SA13).</p> <p>* Landscape Sensitivity Assessment outstanding</p>

Site Ref: CFS18b CFS18c Hill Farm, Stag Lane, Chorleywood *	*	-	?	-	✓	-	✓	*	-	?	*	×	✓	✓	-	✓	-	-	✖ The site, which is adjacent to an LWS to the south west, is made up of greenfield land (SA1) and is currently in use as agricultural land (SA6) which The site is considered as having medium sensitivity to the built environment (SA9). The development may disrupt the setting of the adjacent Heronsgate Conservation Area and the site may contain heritage assets of archaeological interest (SA8) ⓘ Part of the site is in SPZ1 (SA2). The site may contain heritage assets of archaeological interest (SA8). ✓ The majority of the site is previously developed land (SA6). The site is located reasonably close to services and facilities, though is not well served by buses (SA4 & SA11). The site is close to open space (SA10) and the development would deliver 228 38 new dwellings (SA13).
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B.2.5 Maple Cross & West Hyde

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	Explanatory Comments
Site Ref: EOS12.2 EOS12.4 Land to the west and south of Maple Cross (combined sites) *	×	?	?	×	?	×	-	×	×	?	×	✓	✓	✓	✓	✖ The site is greenfield and has biodiversity value (SA1) and it is currently in use as agricultural land (SA6). The development would extend Maple Cross into open countryside and the area is of medium-high sensitivity to built development (SA9). A Grade II Listed Building is adjacent to the site and the site itself includes heritage assets of archaeological interest. A Heritage Impact Assessment found that development here would have adverse impact on the historic environment due to its disruption of the historic agrarian setting (SA8). Though the site is reasonably close to a local shop and primary and secondary school, residents would need to

