



Dacorum Local Development Framework Core Strategy – Submission Stage

Sustainability Appraisal Report Addendum

June 2012



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Dacorum Local Development Framework

Core Strategy – Submission Stage

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Prepared for: Dacorum Borough Council, Strategic Planning and Regeneration

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1 Introduction

1.1 Background

This Sustainability Appraisal Report Addendum has been prepared to report on the sustainability appraisal activities that have been undertaken from the representation on the Pre-Submission Core Strategy in October 2011, up to the Submission of the Core Strategy and associated documents to the Secretary of State. The report covers four main areas:

- Update to the review of the planning context following the publication of the National Planning Policy Framework;
- Analysis and responses to the representations made during the publication of the Pre-Submission Core Strategy;
- Assessment of potential additional and amended Local Allocations; and
- Assessment of proposed amendments to the Core Strategy.

This report does not repeat information provided in the Pre-Submission SA Report (September 2011) and should therefore be read alongside that earlier report. Both this addendum and the Pre-Submission SA Report and working notes that inform it will form part of the portfolio of Core Strategy Submission Documents.

1.2 Stages of SA/SEA

Table 1-1 shows the stages of Core Strategy and sustainability appraisal development undertaken to date, along with those that will need to be completed prior to the adoption of the Core Strategy.

Table 1-1: Stages in the SA/SEA and Dacorum Core Strategy DPD

Dacorum Core Strategy DPD	SA/SEA Stages	Dates
Begin document preparation	<p>Stage A: Setting the context, establishing the baseline and deciding on the scope.</p> <p>A1: Identify other relevant policies, plans and document programmes, and sustainability objectives.</p> <p>A2: Collecting baseline information.</p> <p>A3: Identifying sustainability issues and problems.</p> <p>A4: Developing the SA framework.</p> <p>A5: Consulting on the scope of the SA (Scoping Report).</p>	<p>SA Scoping Report, prepared February 2006.</p> <p>Consultation on Scoping Report February 2006.</p>
Preparation of Issues and Options (I&O) paper and consultation Preparation of	<p>Stage B: Developing and refining options and assessing of effects.</p> <p>B1: Testing the DPD objectives against the SA framework.</p>	<p>Consultation on Issues & Options (I&O) paper May 2006.</p> <p>Preparation of SA Working Note on I&O¹ June 2006.</p> <p>Supplemental I&O paper November</p>

<p>preferred options, including consultation on possible preferred option</p>	<p>B2: Developing the DPD options. B3: Predicting the effects of the DPD. B4: Evaluating the effects of the DPD. B5: Considering ways of mitigating adverse effects preferred and maximising beneficial effects. B6: Proposing measures to monitor the significant effects of implementing the DPDs.</p>	<p>2006. Preparation of SA Working Note on Supplemental I&O in November 2006. Consultation on the Emerging Core Strategy June – August 2009. Preparation of SA Working Note on the Emerging Core Strategy June 2009. Preparation of SA Working Notes for: Housing Growth Options at Hemel Hempstead (August 2009); Strategic Allocations (February and April 2010) and Working Draft Core Strategy (September 2010)</p>
<p>Public consultation on Preferred options</p>	<p>Stage C: Preparing the Sustainability Appraisal Report. C1: Preparing the SA Report.</p> <hr/> <p>Stage D: Consulting on the preferred options of the DPD and SA Report. D1: Public participation on the preferred options of the DPD and the SA Report. D2 (i) Appraising significant changes. D2 (ii) Appraising significant changes resulting from representations. D3: Making decisions and providing Information.</p>	<p>Preparation of the SA Report of the Draft Core Strategy July - October 2010. Preparation of SA Report of the Pre-Submission Core Strategy August – September 2011². <i>Preparation of an Addendum to the SA Report to reflect changes to the Core Strategy made between the Pre-Submission and Submission stages [this addendum]³.</i></p> <hr/> <p>Consultation on Draft Core Strategy and accompanying SA Report November 2010. Consultation on the Pre-Submission Core Strategy and accompanying SA Report October - December 2011. <i>Appraisal of proposed amendments to the Pre-Submission Core Strategy [documented in this addendum].</i></p>
<p>Submission of DPD to Secretary of State</p>	<p>Stage E: Monitoring the significant effects of implementing the DPD. E1: Finalising aims and methods for monitoring. E2: Responding to adverse effects. Preparing the SEA Statement.⁴</p>	<p>To be completed when the Core Strategy is adopted. This is scheduled for Spring 2013.</p>

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

² This is the Environmental Report required by the SEA Regulations.

³ This Addendum forms part of the SA Report at the Submission stage.

⁴ The SEA Statement is required by the SEA Regulations.

2 Update to planning context

The SEA 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 (Core Strategy) 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.

For Sustainability Appraisals the second of these bullets is extended to include wider sustainability objectives.

In the period following the production of the Pre-Submission SA Report there have been major changes to the planning policy context in which the Core Strategy and its accompanying SA have been developed. The most notable of these changes has been the publication of the National Planning Policy Framework (NPPF) to replace the previous Planning Policy Statements (PPS) and Planning Policy Guidance (PPG) documents.

Appendix 1 provides a review of the NPPF to identify the objectives relevant to the development of the Core Strategy and its Sustainability Appraisal.

3 Pre-Submission Representations

Representations on the Pre-Submission Core Strategy and its accompanying SA Report were received during the two consultation periods, November-December 2011 and February-March 2012. Amongst the large number of representations received, some were directly or indirectly related to the Sustainability Appraisal. These SA specific representations were made by the following organisations/individuals:

- Natural England;
- Hertfordshire County Council - Strategic Land Use and Transport Planning team;
- Savills on behalf of Grand Union Investments;
- The Mounts Resident Association, Bovington;
- Mr Nick Hanling;
- Transition Town Berkhamsted; and
- Boyer Planning on behalf of W.Lamb Ltd

Details of the representations received and the responses to these comments are provided in Appendix 2. None of the representations have resulted in significant changes being made to the information or findings that were included in the Pre-Submission SA Report.

The representations from Savills (on behalf of Grand Union Investments) and Boyer Planning (on behalf of W.Lamb Ltd) are lengthy and detailed in nature, the former being in the form of a 44 page Sustainability Appraisal Review document, whilst the latter provides comments relating to the SA interspersed with comments on the Core Strategy itself, whilst also providing additional SA related information in Appendices.

4 Assessment of Additional and Amended Local Allocations

Following on from the consultation on the Pre-Submission Core Strategy a number of new and amended sites were put forward by landowners and developers as potential new local allocations. In addition, more detailed information was made available for some of the sites previously considered during the process of selecting the preferred allocations for inclusion in the Core Strategy.

Using the same methodology that was applied for the previous rounds of site assessment, the new and amended sites were assessed against the framework of SA objectives. For those sites which were unchanged from previous assessments, but for which new or more detailed information was available (e.g. an indicative masterplan), the previous assessments were reconsidered, amended and updated where relevant.

An SA Working Note was produced to document the findings of these new assessments. This is provided, along with its accompanying appendices, as Appendix 3 to this SA Report Addendum.

5 Assessment of proposed amendments to the Core Strategy

5.1 Introduction

This section summarises the findings of the combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) that has been undertaken in relation to the amendments to the Core Strategy that are being proposed by Dacorum Borough Council as a response to representations on the Pre-Submission Core Strategy.

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

None of the changes proposed are classified as a Significant Change. The amendments put forward in the document are therefore categorised into two types:

- Minor changes to policy and supporting text; and
- Editorial changes to policy wording and supporting text to improve clarity.

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

This document reports on the SEA/SA consideration of the proposed amendments and, where appropriate, includes the re-assessment of the relevant parts of the Core Strategy.

5.2 Assessment methodology

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

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

The results of the Screening Assessment of all proposed policy changes and changes to supporting text are provided in Appendix 4.

5.3 Screening assessment findings

Of the proposed amendments to the Pre-Submission Core Strategy, 13 were identified in the screening as having the potential to have minor effects on the sustainability appraisal objectives. These related to the amended strategic objectives and policies, as outlined in Table 2.

The remainder of the changes were considered as negligible in terms of their effects on sustainability and were not considered further in the SA/SEA.

None of the changes were identified as likely to have significant effects that would warrant a revised policy assessment to be undertaken.

Table 2: Results of screening proposed amendments to objectives, policies and supporting text

Core Strategy Reference	Summary of Proposed Amendment	Implications for Sustainability Appraisal
Strategic Objective 13	Addition of " <i>reduce carbon emissions</i> " to the objective.	Positive implications for SA5 (GHG emissions). Compatibility between SA5 and Strategic Objective 13 changed from a neutral to a positive.
CS5 Green Belt	Some changes proposed to bring the policy in line with the National Planning Policy Framework.	Change could result in Green Belt development that would not have been allowed under the current policy. Potential for negative implications for SA11 (Landscape). However no change required to the current assessment finding of 'minor positive effects'.

Retail hierarchy supporting text	Additional text supporting provision and retention of accessible shops in local centres.	Positive implications for SA13 (Sustainable Locations) and SA19 (Access to Services). No change required to current assessment finding of 'minor positive effects' for these objectives against the economy and retail policies.
CS19 Affordable Housing	Policy amendment that allows for a small element of open market housing in rural housing sites.	If allowing a small element of open market housing in rural housing sites facilitates the delivery of affordable housing there would be positive implications for SA15 (Housing). No change required to the current assessment finding of 'significant positive effects'.
Biodiversity/geological conservation supporting text paragraphs (x2)	New paragraph included which describes that a precautionary approach, avoiding damage and encouraging alternative natural greenspace, will be pursued in relation to development proposals. New paragraph recognising the importance of geodiversity.	Both new paragraphs will have positive implications for SA1 (Biodiversity). No change required to the current assessment finding of 'significant positive effects' for the Natural Environment policies against SA1.
Using resources efficiently supporting text	Minor change to refer to " <i>more efficient appliances</i> " – compared to " <i>efficient appliances</i> ".	Positive implications for SA5 (GHG emissions). No change required to the current assessment finding of 'significant positive effects' for Policy CS28 against SA5.
Sustainable design/construction supporting text	New text proposed that strengthens consideration of biodiversity and water efficiency.	Positive implications for SA1 (Biodiversity) and SA2 (Water). No change required to the current assessment finding of 'minor positive effects' for SA1 and 'significant positive effects' for SA2 in relation to Policy CS29.
Policy CS29: Sustainable Design and Construction	New element added to the policy to " <i>Minimise impacts on biodiversity and incorporate positive measures to support wildlife</i> ".	Positive implications for SA1 (Biodiversity). No change required to assessment for SA1 against this policy as there is already a positive assessment.

Hemel Hempstead Place Strategy supporting text	Additional supporting text added that references the heritage of the paper making industry.	Positive implications for SA10 (Heritage). No change required to the current assessment finding of 'minor positive effects' for the Hemel Hempstead place strategy against SA10.
Hemel Hempstead Place Strategy supporting text	Additional supporting text added that requires each of the town centre zones to provide something different to the town centre and to be sensitive to the character of adjoining zones.	Positive implications for SA20 (Town Centres). No change required to the current assessment finding of 'minor positive effects' for the Hemel Hempstead Place Strategy against SA20.
Hemel Hempstead Town Centre Vision Diagram	Amend boundary to exclude Paradise Fields	Positive implications for SA1 (Biodiversity), SA12 (Health) and SA16 (Community identity). Update to SA1 assessment to add minor positive effects to the mixed effects (uncertain and minor negative) that are currently reported for different aspects of the Hemel Hempstead Spatial Strategy against SA1. No change required to the current assessment finding of 'minor positive effects' for the Hemel Hempstead Spatial Strategy against SA12 and SA16.
Tring Place Strategy supporting text	New paragraph added that supports investment that maintains existing and provides new sports facilities.	Positive implications for SA12 (Health). No change required to the current assessment finding of 'minor positive effects' for the Tring Place Strategy against SA12.
Countryside Strategy supporting text	New paragraph that recognises the importance of heritage assets in the countryside.	Positive implications for SA10 (Heritage). No change required to the current assessment finding of 'minor positive effects' for the Countryside Strategy against SA10.

5.4 Implications for Habitats Regulations Assessment

None of the proposed amendments have any implications for the existing findings of the Habitats Regulations Assessment – as documented in the Dacorum Core Strategy HRA Update Summary Report (September 2011). The conclusions of this Summary Report therefore remain unchanged.

6 Consideration of options

6.1 Background

During the development of the Core Strategy a wide range of both strategic and more detailed options have been developed and have been subject to sustainability appraisal.

The Environmental Assessment of Plans and Programmes Regulations 2004¹ require that the Environmental Report (the Pre-Submission SA Report in the case of the Dacorum Core Strategy) 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 12 (2).

Section 5 of the Pre-Submission SA Report provided a summary of the assessments undertaken during the various stages of the development of the Dacorum Core Strategy during which a wide range of options and alternatives were considered for delivering the plan objectives across the full range of spatial planning issues within the scope of the Core Strategy. Due to the length and detail of the assessments and their accompanying reports the full assessments were not provided in the SA Report. Instead signposting was used to direct the reader to the location of these other assessments.

A second requirement of the Environmental Assessment of Plans and Programmes Regulations 2004 is that at plan adoption a statement must be made available that amongst other requirements should include:

"... the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with" Article 16 (4)(e).

In preparation for meeting this requirement, this section provides a succinct description of how alternatives have been considered within the SA process.

It should be noted that the role of the SA/SEA in this process is to provide assessments of the alternatives being considered, not to make the decision as to which alternatives are taken forward. This is made clear in Government guidance on SEA²:

"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 from Appendix 6:

- Identifying alternatives

¹ Statutory Instrument 2004 No. 1633

² A Practical Guide to the Strategic Environmental Assessment Directive. ODPM, 2005

"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".

- **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".

6.2 Strategic options

6.2.1 Issues and Options (2006)

At the Issues and Options stage in May 2006 the SA assessed a range of different strategic options, including those for the distribution pattern of housing growth across the Borough; the amount of new dwellings to be provided; and options for the location of a greenfield extension (if required). A range of other less strategic options were also considered at this stage. These related to issues such as housing density, land-use patterns in local and town centres, transport, accessibility and community facilities. Details of the assessments of these options are sign-posted from Section 5.2 of the SA Report (November 2011). The following text provides a summary of the options considered and the findings of the SA.

6.2.1.1 Spatial Strategy

Under Issues 5.1, 5.2 & 7.2 the SA appraised the Spatial Strategy options of either concentrating development at Hemel Hempstead or distributing development between Hemel Hempstead, Tring and Berkhamsted. The appraisal was undertaken by SA objective, with the Hemel Hempstead option being favoured due to increased potential for developing on brownfield sites, creation of thriving mixed use development, the greater potential for town centre development, with an associated reduction in the need to travel, greater potential for integrating development with public transport, and in addition the reduction in the pressure for developing urban extensions on greenfield sites.

The option to distribute development between Hemel Hempstead, Berkhamsted and Tring was adjudged to have merits in terms of the diversification and enhancement of the local centres, although it was also considered that too much dispersion of key functions has the potential to undermine the role of Hemel Hempstead as a district centre.

With specific reference to housing locations, Issue 6.3 in the Core Strategy Issues & Options Paper considered the options of focusing development within Hemel Hempstead or distributing housing requirement beyond Hemel Hempstead. The SA findings favoured the focusing of housing growth at Hemel Hempstead due to the reduced need to travel to access jobs, services and amenities (with associated benefits for greenhouse gas emission levels and air quality), increased potential to use brownfield sites, thereby reducing the demand for greenfield development.

Concentration of the majority of the growth in the Borough at Hemel Hempstead is also a policy in the East of England Plan (Policy LA2: Hemel Hempstead Key Centres for

Development and Change) and even after a successful legal challenge, following which some sections of text were been removed from Policy LA2, the requirement for the majority of Dacorum's development to be focussed in Hemel Hempstead still remains.

Therefore given the findings of the sustainability appraisal, as summarised above, and the requirements laid down in Policy LA2 of the East of England Plan, the concentration of development at Hemel Hempstead was chosen as the preferred option for the spatial strategy.

6.2.1.2 Greenfield extensions

Issue 6.3 also considered the options for locating greenfield extensions (if necessary) at Hemel Hempstead, Tring, Berkhamsted and other settlements. The assessments for the options to extend at Hemel Hempstead, Tring, and Berkhamsted were all similar in their findings, with the assessment marginally favouring extensions at Hemel Hempstead due to increased access to community facilities. As this was an early Issues and Options stage assessment, there were no locational assumptions made in terms of the sites to be used for any greenfield extensions.

A preferred option for locating greenfield extensions was not selected at this stage of the Core Strategy's development.

6.2.1.3 Housing numbers

A range of housing growth scenarios was also appraised at the Issues and Options stage, as follows:

- Adopting RSS14 recommendation of 6,300 dwellings;
- Council's estimate of housing need – 7,100 dwellings;
- RSS14 original proposal of 8,200 dwellings; and
- 10,000 dwellings, suggested by RSS14 objectors.

The SA found that the lower levels of growth would have less impact on the natural environment than the higher levels, but that against the social and economic objectives the higher levels performed better. It was identified that housing without the supporting employment opportunities, could lead to an increase in out-commuting – with associated implications for increases in greenhouse gas emissions.

A preferred option for a housing number was not selected at this stage of the Core Strategy's development.

6.2.1.4 Supplemental Issues and Options - November 2006

In conjunction with St Albans City and District Council, Dacorum BC undertook consultation on options for growth to meet the proposed extra growth at Hemel Hempstead which had been recommended by the East of England Plan Panel Report and which had not originally featured in the Draft East of England Plan.

The sustainability appraisal found that if the proposed extra growth was required to be delivered at Hemel Hempstead it would be likely to have widespread sustainability implications. Whilst there may be positive social and economic effects, it is also likely that there would be some significant adverse environmental effects. These adverse effects are mainly linked to the intrusion into the Green Belt that would result from the growth considered. With this would come the direct impacts of loss of greenfield sites and a range of other direct and indirect impacts.

The appraisal also provided an assessment of 17 potential urban extensions in terms of potential constraints and opportunities

No preferred option for an urban extension was selected at this stage.

6.2.2 Emerging Core Strategy – 2009 and 2010

Consultation on the Emerging Core Strategy was undertaken in June 2009. This was followed by further consideration in August 2009 on options for significant levels of housing growth at Hemel Hempstead, which built on the work undertaken in November 2006. Additional strategic allocations in Tring, Berkhamsted, Markyate, Bovington and Kings Langley were considered in February 2010, followed by consideration of further strategic allocations in Hemel Hempstead in April 2010.

6.2.2.1 Development Strategy

Following consultation on the options for the Development Strategy in 2006 the preferred option of focusing the majority of development at Hemel Hempstead was further developed to include the following main elements:

- *Hemel Hempstead, as the New Town, is the location for housing and economic growth. This will affect parts of the town very significantly (especially the town centre and Maylands Business Park). It would also affect some areas around the town if extensions to the town are built*
- *The market towns and large villages will remain stable. Their size and character will be protected. Additional building areas will be restricted. Population growth may not occur (or if it does it will be marginal).*
- *The countryside is an area of restraint to be protected in its own right. Where small scale local housing or other development is needed, it would be directed to key villages, as now.*

The appraisal found that focusing development in Hemel Hempstead was likely to have positive effects on biodiversity and landscape, due to the protection of countryside, and for greenhouse gas emissions and air quality, as a result of reducing the need to travel. However it was also found that focusing development and associated services in Hemel Hempstead could lead to communities in other settlements becoming isolated if it resulted in a loss of facilities in the smaller settlements.

The strategy in this form was not taken forward to the next stage of Core Strategy development. Instead the strategy evolved to allow for an appropriate level of development in the market towns and larger villages (see Draft Core Strategy – November 2010 below).

6.2.2.2 Levels of housing

The Emerging Core Strategy at Hemel Hempstead was produced at a time when there was uncertainty as to the result of a judicial review in the High Court relating to the housing figures in the East of England Plan. This placed a requirement for 17,000 new dwellings to be provided between 2006 and 2031 and assumed strategic development at Hemel Hempstead, i.e. major review of the Green Belt and large urban extensions into the countryside.

Due to the uncertainties about the growth at Hemel Hempstead, Dacorum BC assumed that the Core Strategy should provide a minimum level of dwellings in the Borough

without any major incursion into the Green Belt. This was assumed as a continuation of housing growth for the Borough of 360 dwellings per year i.e. the same rate as in the Dacorum Borough Local Plan. Over the period 2006 – 2031 this would equate to a minimum of 9,000 dwellings.

The appraisal found that the provision of 9,000 homes would have adverse effects against the SA environmental objectives and positive effects against the social and economic objectives.

At this stage of the Core Strategy's development the SA did not recommend any level of housing as the preferred option.

6.2.2.3 Hemel Hempstead options for growth

Three strategic options for significant growth at Hemel Hempstead were appraised (Northern, Eastern and Dispersed). The SA provided a comparative assessment between the options and also provided an assessment of the 'common features' for all of the growth options against the SA objectives. The effects related to the Dispersed and Eastern growth options were found to be relatively similar given that the sites included in the options were largely the same. The Northern growth option was found to have the most potential for significant adverse effects on the environment, notably against the landscape and biodiversity objectives. All the options were found to perform poorly against the SA objective encouraging development on brownfield sites.

At this stage the SA did not make recommendations as to which of these options should be pursued.

However none of the options were progressed further due to the a successful legal challenge brought by Hertfordshire County Council and St Albans City and District Council which resulted in the East of England Plan policy relating to Hemel Hempstead (Policy LA2) being amended to no longer provide a specific quantum of growth at Hemel Hempstead.

6.2.2.4 Strategic Sites and Local Allocations

The appraisal of potential strategic sites and local allocations continued throughout the Core Strategy's development (June 2009, February 2010, and April 2010). This included sites at Hemel Hempstead, Tring, Berkhamsted, Markyate, Bovington and Kings Langley. All sites were considered individually rather than within the wider settlement context and it was not the role of the appraisal to recommend certain sites as preferred options. A final assessment of site options was published in June 2012. Where appropriate, this updates previous assessments in the light of new information available and combines them into a single document.

6.2.3 Draft Core Strategy (November 2010)

6.2.3.1 Spatial Strategy

Whereas the spatial strategy in the 2006 Emerging Strategy did not plan for growth at Tring or Berkhamsted, the Draft Core Strategy allows some level of growth as detailed in Policy CS1: Distribution of Development:

"...

The market towns and large villages will accommodate new development for housing, employment and other uses, provided that it:

(a) is of a scale commensurate with the size of the settlement and the range of local services and facilities;

(b) helps maintain the vitality and viability of the settlement and the surrounding countryside;

(c) causes no damage to the existing character of the settlement or its adjoining countryside; and

(d) is compatible with policies protecting the Green Belt and Rural Area

...”

The SA found that the policy should provide a good balance between focusing development in the key settlements whilst allowing for demonstrated local needs to be met in smaller settlements and rural areas. The growth in key settlements will help to support certain regeneration needs in the towns and improve levels of community vitality, with associated social and economic benefits. It will also help to service the needs of surrounding areas. By concentrating growth in Hemel Hempstead and the other larger settlements the impacts on the Borough’s natural environment will be minimised.

This strategy was taken forward as the preferred strategy for inclusion in the Pre-Submission Core Strategy.

6.2.3.2 Housing Levels

In November 2010, the Draft Core Strategy considered two options for levels of housing growth, these being:

- Option 1: 370 dwellings per annum (dpa); and
- Option 2: 430 dpa.

The appraisal identified that delivery of the higher level of growth (Option 2), whilst helping to achieve objectives relating to housing provision and in particular affordable housing, would have adverse effects on local landscapes given the requirement to develop sites in the Green Belt. Conversely the lower level of growth, whilst reducing environmental effects, were identified as falling short in terms of meeting local needs for housing and associated community infrastructure that would be provided as a result of new development.

In addition to the two housing growth options contained in the Core Strategy, a natural growth option of 500 dpa was also assessed as part of the SA to provide a comparison assessment so that the implications of the two options could be compared with a situation in which all natural growth were to be met.

The SA found that delivering 500 dpa would result in the need for significant additional development in the Green Belt with associated adverse effects on some of the environmental objectives, in particular a significant adverse effect against the landscape and townscape objective. Resource use would increase and there would be increased waste, increased emissions to air and additional loss of tranquillity. However, the higher levels of new dwellings would go further towards meeting the needs for new housing and supporting the planned levels of new job creation that were proposed in the November 2010 draft Core Strategy.

The Pre-Submission Core Strategy took forward the level of 430 dwellings per annum as the preferred option. In determining the appropriate level of housing the Council considered the following issues:

- *The amount needed to meet forecast household growth in the borough;*
- *The ability to deliver a sufficient, flexible and steady housing supply;*
- *The opportunities to ensure a mix of housing (both in terms of tenure and type);*
- *Local needs and opportunities, and potential benefits;*
- *The timing of key infrastructure to support new housing;*
- *The balance between jobs and homes;*
- *The support to the local economy and achievement of regeneration targets; the effect of new developments (i.e. the land used);*
- *The relationship to environmental constraints and impact upon the character of particular settlements; and*
- *The desire to protect the countryside.*

The sustainability appraisals undertaken on the range of housing number options during the development of the Core Strategy has helped the Council understand the implications of the different options for growth against the majority of these issues.

6.2.3.3 Employment provision

In terms of employment provision, the draft Core Strategy considered the creation of up to 18,000 additional jobs in the Borough between 2006 and 2031. As with all the elements of the Core Strategy this was appraised against the SA objectives, with significant positive effects predicted against the economic objectives, but with potential adverse effects in terms of greenhouse gas emissions due to the imbalance between jobs and housing which would be likely to result in increased levels of in-commuting.

As the Core Strategy was developed further, changes in the planning context following the successful legal challenge to parts of the East of England Plan, which reduced the levels of housing planned for Hemel Hempstead, and the changing economic climate, led to a reduction in the forecast level of jobs growth over the plan period to a level 10,000 new jobs. This new level of jobs was arrived at through re-running the employment model³ for the Borough and provides a balance that better reflects the planned level of future housing and the provision of new jobs than if 18,000 jobs were still in place with the new lower level of housing growth in Dacorum (post East of England Plan revision). Growth at Maylands is seen as providing some sub-regional based/scale jobs and could therefore result in increased levels of in-commuting.

The sustainability appraisal found that the better balance between homes and jobs provision would help reduce traffic congestion and carbon emissions which would exacerbated by high commuting levels.

³ Roger Tym and Partners

7 Next steps

Section 9 of the Pre-Submission SA Report provides details of the SA process through to plan adoption.

However, just as this addendum has been prepared to report on the sustainability appraisal activities undertaken between the Core Strategy Pre-Submission, up to its submission to the Secretary of State, it may also be necessary to undertake further additional sustainability appraisal to respond to any Core Strategy changes that are recommended by the Inspector, or put forward by the Council, during the Examination process. Any such additional sustainability appraisal will be documented in a further addendum to the SA Report.