



**Dacorum Local Development
Framework
Core Strategy – Pre Submission**

**Sustainability Appraisal Report
Appendix D: Consultation Comments**

September 2011

Appendix D – Consultation Comments

As required by the SEA Directive, consultation has been undertaken at several stages of the process. The reports to date which have been consulted upon include:

- The SA/SEA Scoping Report (in February 2006)
- Issues and Options SA Working Notes (in May and November 2006)
- The Emerging Core Strategy SA Working Note (in June 2009)
- The SA Report of the Draft Core Strategy (in November 2010)

A summary of the consultation responses received and the actions taken in response are provided in the following tables. Please note no consultation comments were received in relation to the three SA Working Notes.

1 Comments on SA/SEA Scoping Report

Summary of Comments	How the comments have been taken on board
Countryside Agency/Landscape, Access and Recreation Division	
We have read the draft Scoping Report with interest and in general, we are satisfied that the Sustainability Appraisal of the LDF is proceeding in a proper, logical and comprehensive manner.	No action required.
<p>PPP review</p> <p>The review of relevant plans, polices and programmes is comprehensive and well-focussed. We can suggest no obvious omissions.</p>	No action required.
<p>Baseline section on landscape</p> <p>Could be improved by reference to information from Countryside Quality Counts (CQC) on landscape change, currently the project is under going a second phase covering the period from 1998-2003.</p> <p>The CQC study found that in the Chilterns Joint Character Area (JCA) there had been 'some changes inconsistent with character'; in the Bedfordshire and Cambridgeshire Claylands JCA there had been 'marked changes inconsistent with character' – Of course the JCAs extend beyond the Borough, but the position may be worth further investigation.</p> <p>Information regarding the presence of and access to open space and on the length and condition of Public Rights of Way is missing – the current and future green spaces strategies should provide a suitable up to date database.</p> <p>The Countryside Agency has published maps of Open Access Land under the CroW Act – a map for Hertfordshire can be access at www.countrysideaccess.gov.uk/where_you_can_go.php; information on the Rights of Way network should also be available from the County Council's work on the Rights of Way Improvement Plan.</p>	Baseline amended.
<p>Problems/opportunities/issues</p> <p>The Countryside Agency welcomes the analysis in Table 30 [issues and opportunities table] as it relates to human health, landscape and recreation, sport and leisure.</p>	No action required.
Main/priority issues	No action required.

The Countryside Agency agrees with the course of action proposed in paragraph 3.2.	
<p>SA/SEA Framework</p> <p>The Countryside Agency is content that the proposed sustainability framework should enable a thorough appraisal of the LDF.</p> <p>The Countryside Agency would like to see the first criterion for Objective 11: Landscape improved - It should be changed to "To conserve and enhance the landscape character of the district".</p>	Changes have been incorporated in revised appraisal framework.
<p>Assessment and monitoring indicators</p> <p>The indicator of changes in landscape features will need to be related to the descriptions of the various local landscape character areas.</p> <p>The Countryside Agency is aware of the difficulty of setting targets and indicators of landscape change and is working to develop practice in this area through our Countryside Quality Counts (CQC) initiative – the CA hopes to be in a position to issue guidance later this year.</p> <p>Under Objective 12: To encourage healthy lifestyles it would be helpful to monitor "Length and <u>condition</u> of cycle ways and footpaths".</p>	Changes have been incorporated in revised appraisal framework. Baseline amended.
<p>Consultation</p> <p>As one of the statutory consultation bodies the Countryside Agency is happy to respond to all future consultations and assist in the appraisal process in anyway it can.</p>	Noted.
<p>Methodology</p> <p>You might like to consider the use of Quality of Life Assessment as a tool to assist in the identification of impacts for the appraisal.</p>	Noted.
English Heritage	
<p>Plans, policies and Programmes</p> <p>In relation to PPS1 (pg8) reference should also be made to the emphasis placed on protecting and enhancing the historic and natural environment.</p>	PPP review amended.
<p>Current and future state of the environment</p> <p>Cultural heritage (pg22) – it would be more accurate to refer to the major contribution of the historic environment to the economy in general (not just in rural areas).</p>	Amended.
<p>Baseline</p> <p>Heritage Counts for the East of England 2005 is available and can be found on the HELM</p>	Baseline amended.

<p>website.</p> <p>Should National Trust properties be mentioned here? There are other sites open to the public, but the issue is the state of historic assets rather than their visitor potential.</p> <p>The reference to English Nature should be English Heritage.</p> <p>Reference to the of character areas is interesting and should help to capture aspects which are not covered by designations. Might be better to consider the extent to which proposals within these areas respect local distinctiveness and context, rather than aiming for consistency.</p> <p>The number of listed buildings of all grades should be given.</p> <p>Further data should be included to establish the condition of the historic environment. Recommend that the % of Conservation Areas covered by Appraisals should be included as a measure of positive management (BVPI 219).</p> <p>Historic Environment Record reference is welcomed. It would be appropriate to refer to the historic landscape characterisation data that is now available (referred to in figure 7).</p>	
<p>Landscape</p> <p>Recommended that reference be made to the Historic Landscape Characterisation (HLC) data now held in GIS format in the County Historic Environmental Records Centre.</p>	Baseline amended.
<p>Issues, Opportunities and Priorities</p> <p>Would be helpful to identify key trends and challenges.</p> <p>Text in the opportunities column in table 30 is excellent.</p> <p>The need for the distinctive qualities of Tring, Berkhamstead and Hemel Hempstead to be preserved while accommodating growth should be a key priority. High quality design, sensitive to its context, is crucial.</p> <p>High density should not sacrificing townscape quality.</p>	Noted.
<p>SA/SEA Objectives and Framework</p> <p>Generally support the framework.</p> <p>Include some qualitative evaluation is built into the assessment framework.</p> <p>May want to broaden objective 10 to 'maintain and enhance the historic environment and cultural assets'.</p> <p>Criteria:</p> <p>Recreating historic features: suggest this is changes to: '..and restore historic character</p>	The SA/SEA Framework has been updated.

<p>where appropriate, based on sound historical evidence’.</p> <p>3rd criterion – suggest changed to: ‘to encourage thoughtful, high quality design in housing and mixed use developments – to a density which respects the local context and townscape character, and includes enhancement of the public realm’.</p> <p>Possible assessment indicators:</p> <p>Buildings at Risk data should be extended to cover grade II listed buildings since these are more representative of the historic building stock;</p> <p>Numbers of historic assets taken from the ‘at risk’ category should be measured’.</p> <p>Include % of conservation areas covered by appraisals;</p> <p>Quality in the built environment as measured by public perception surveys might be included;</p> <p>A measure of increased public access or interpretation of sites could be included.</p>	
English Nature	
<p>PPP review</p> <p>Should include:</p> <p>Natural Environment and Rural Communities Act (2006)</p> <p>Regional Woodland Strategy for the East of England (www.woodlandforlife.net)</p> <p>Catchment Flood Risk Management Plans</p>	<p>PPP review amended.</p>
<p>Main issues and opportunities</p> <p>These are likely to include: fragmentation of habitats, loss of infrastructure to support agriculture [comment: might not be relevant to Watford] and the rural economy (e.g. closure of livestock markets and abattoirs) , low flows in rivers during summer months, invasive non-native species, air and water pollution (surface and ground water), effects of climate change.</p> <p>SEA should consider implications of appropriate assessment if required.</p> <p>Adverse air quality is likely to be detrimental to Beech woodland and lowland heathland.</p>	<p>Issues taken into account when undertaking the assessment.</p> <p>HRA process has been completed.</p>
<p>Baseline information</p> <p>In order to establish the baseline the following should be addressed:</p> <ul style="list-style-type: none"> - Status of habitats and species - Abundance and/or extent of habitats and species - Distribution of habitats and species - Condition of habitats and species 	<p>Baseline amended.</p>

<ul style="list-style-type: none"> - Should refer to www.ukcip.org.uk <p>At a borough scale, EN agrees with the issues identified within the proposed trends.</p> <ul style="list-style-type: none"> - Should refer to brownfield land as these sites may support significant wildlife interest. - Should consider cross border issues. E.g. air quality, climate change- vulnerability of low lying areas to flood risk and low flows in rivers in Dacorum. 	
<p>Assessment framework</p> <p>Generally supportive of the appraisal framework.</p> <p>It is suggested</p> <ul style="list-style-type: none"> - Change 'Avoid damage to designated...favourable condition to 'protect and enhance designated wildlife sites (international, national and local) and protected species to achieve and maintain favourable condition status. - Change Loss/damage to SSSIs to % of SSSI by area in favourable condition status. - Incorporate objective/indicator regarding integrating biodiversity into development. - EN welcomes the provision for nature conservation interest within material assets. <p>The SEA should include consideration of:</p> <p>likely significant effects on the environment of the plan giving particular attention to biodiversity, flora and fauna, and consider the likely effects on soil, water and landscape.</p> <p>The interrelationship between these issues.</p> <p>Short, medium and long-term effects, permanent and temporary effects: positive and negative effects, and secondary, cumulative and synergistic effects.</p>	<p>The SA/SEA Framework has been updated.</p> <p>The assessment considered the effects on these environmental factors and these different types of effects. It also considered the interrelationships between them.</p>
<p>Other issues</p> <p>English Nature would like to draw the attention to the Hertfordshire Biological Records Centre which has drawn up a list of potential indicators for which data exists and holds a substantial number of records.</p> <p>Other useful sources of information include:</p> <ul style="list-style-type: none"> - Biodiversity Action Reporting System-web based information system that supports the planning, monitoring and reporting requirements of national and local BAPS. The public can learn about BAP activities. 	<p>Existing indicators from the Hertfordshire Quality of Life Report 2004 have been incorporated in the revised assessment framework; these are partly based on HBRC data.</p>
<p>Identification of significant effects through the suggested approach</p> <p>English Nature believes that the significant effects of the development of the DPDs can be identified using the approach outlined.</p>	<p>No action required.</p>

Environment Agency	
Natura 2000 sites The Environment Agency confirms that Dacorum has one Natura 2000 site	No action required.
The following policies. Plans and programmes should be included: Draft PPS 3 Housing Draft PPS 25 Development and Flood Risk Draft Catchment Flood Management Plan (CFMP) for the Colne Catchment due to the implications for flood risk in the Dacorum area	PPP updated.
The summary of PPS 1 Sustainable Development should be amended to reflect the need to promote all three aspects of sustainable development not just focus on environmental enhancements and promoting a greener more environmentally focussed community	To be amended in PPP review.
Baseline section on biodiversity The EA is supportive of securing, strengthening and enhancing the biodiversity and natural features which characterise Dacorum's part of the natural area. The overall tone of the section does not support biodiversity in a more general manner and needs to look more broadly at the biodiversity of Dacorum and encourage enhancements throughout - This is particularly significant along river corridors such as the River Colne, the River Ver and River Lee.	Baseline amended.
Baseline section on climatic factors This section needs to be cross referenced with the sections on water resources (including flood risk) in the relation to adaptation to climate change.	Baseline amended.
Baseline section on material assets Inclusion of indicators BV 216a and BV 216b is welcomed.	No action required.
Baseline section on water resources Draft PPS 25 also requires the achievement of 'good ecological status of inland waters and should be noted in this section. The Environment Agency questions the statement that some areas of Hertfordshire suffer from over abstraction of water resources. A map regarding chemical and biological river quality has been provided which should be included in the Environmental Report. It is suggested to include a map illustrating the flood risk in the area.	Baseline amended. The assessment considered the links between water consumption and housing development.

<p>The Environment Agency recommends conducting a Strategic Flood Risk Assessment (SFRA) as required by PPG 25 ('sequential test') and draft PPS 25.</p> <p>The Environment Agency suggests including trend data for flood risk and water resources (water quantity and quality). More attention should be paid to the links between the provision of housing and water resources and flood risk issues.</p> <p>The Environment Agency recommends paying more attention to the interrelationship between Contaminated Land in Dacorum and the issue of water quality.</p>	
<p>Environmental and sustainability issues, opportunities and priorities</p> <p>Opportunities for the enhancement of biodiversity in general should be encouraged.</p> <p>This section should also outline how the LDF could prevent the pollution of water courses.</p>	Noted.
<p>Main issues in Dacorum</p> <ul style="list-style-type: none"> - Development should not be sited in close proximity to rivers and encroachment on river corridors should be avoided at all costs. - Ensure no adverse effects on ecology. - The River grade presents itself for potential ecological enhancements. - The Dacorum area is within an area of likely overabstraction. - Water efficiency should be promoted on all new developments. 	Issues amended.
<p>SA/SEA Objectives</p> <p>The Environment Agency recommends to re-assess the proposed assessment framework.</p> <p>The Environment Agency recommends to reword the criteria regarding flood risk to reflect that developments should not take place in high risk areas.</p> <p>Remove reference to Coastal flooding.</p> <p>In respect of climate change the criteria The Environment Agency recommends to make reference to climate change adaptation in the water resources & flood objectives and criteria</p>	The SA/SEA Framework has been updated.
<p>Consultation and Next Steps</p> <p>Stage B: Assessment of the effects of the LDF alternatives.</p> <p>With regards to point 8 'no net loss', it should be highlighted that the LDF should seek to enhance and improve biodiversity as stated in PPS 1 and PPS 9.</p>	The assessment considered the need for the Core Strategy to enhance and improve biodiversity.
Historic Environment Unit, Hertford	
<p>Enter under historic assets, the total number of sites in Dacorum entered on the Hertfordshire Historic Environment Record. Current total is 819 (April 2006). A number of these are</p>	Information has been included on heritage assets as outlined in Heritage

national importance, but which are not Scheduled Monuments.	Counts (2009).
Core Strategy to include measures to improve management of historic assets and improved access, to foster greater understanding of this resource.	Noted. Not for the SA.
The County Council's Historic Environment Unit can offer advice throughout the SEA/SA process.	Noted.
Use Archaeological and historic environment characterisation methodologies to assess significant impacts of the DPDs.	Noted.
Thames Water	
PPP review Reference is made in Table 1 to PPS12 as a reviewed document, but not to paragraphs B3-B8 on the provision of utility infrastructure. It is recommended to consider these paragraphs within the description of the current and future state of the environment.	PPS12 no longer refers to utility infrastructure.
Baseline description for water resources and flooding It needs to be stated that as well as fluvial, sewer flooding needs to be taken into account when considering the management and reduction of flood risk. PPG 25 does not clearly identify the risk of sewer flooding, this issues is addressed in the revised PPS 25.	Baseline amended.
SA/SEA Framework Thames Water supports the use of Sustainable Urban Drainage Schemes (SUDS) where they are well maintained; poorly maintained SUDS can potentially increase the amount of runoff that is received by surface water sewers and loose the benefits that are stated in that paragraph [sic].	Noted.
Hertfordshire Gardens Trust	
The Trust is concerned that there are over 200 sites in the County that are not registered as of national or international significance but they still play an important part in defining Dacorum's landscape. They should be acknowledged in future DPD's.	Noted. Not an issue for the SA.
Scoping Report concentrates on development in urban areas, But development is occurring close to historic landscapes. Scoping Report should reflect awareness of these landscapes, so steps can be taken to safeguard their historic integrity.	Assessment considered impacts on both urban and rural landscapes.
Chilterns Conservation Board	

The CCB supports Objectives 11, 1, 2, 8 and 13.	No Action Required.
Applauds the inclusion of the Chilterns AONB Management Plan.	No Action Required.
LDF should recognise the Chilterns AONB in all LDD's.	Noted. Not an issue for the SA.
Refer to AONB Management Plan not ANOB Management.	Text amended.
Para 2.3.5- Landscape- The Chilterns AONB Management Plan sets the framework for conserving and enhancing the Chilterns.	Noted.
Para 2.3.8- Make reference to the Chilterns Chalk Streams. The chalk streams are suffering from abstraction and this issue should be recognised. Council needs to address this issue through the planning process wherever possible.	Baseline and issues amended.
Major concern about the impact of noise on the tranquillity of the Chilterns AONB. One significant contributing factor is air traffic. This issue should be addressed in the emerging LDD's through production of strategic noise maps and action plans.	Noise was considered as part of the assessment process.
Potential Indicator- % increase in use of local building materials (bricks and flint in the Chilterns).	To be considered when monitoring measures are finalised.
Objective 11 deals with the conservation and enhancement of the landscape. The same terminology should be used in the criteria and not protect and enhance.	Noted.
Para 4.3.2: 'Enhance and protect the countryside' should be amended to 'conserve and enhance the countryside'.	Noted. Not an issue for the SA.
Dacorum Environmental Forum	
The Forum would like to remain part of the consultation process.	Noted.
Loosing the Chilterns Beechwoods should be prevented, if not mitigated.	Considered as part of the HRA.
Refer to DBC Corporate Environmental Policy.	PPP amended.
2.3.8- Refer to water efficiency and pressure on water supply due to increased demand and infrastructure.	Baseline updated.
Renewable energy to be included in Issues table.	Noted.
Hertfordshire Biological Records Centre	
The LDF has the potential to impact the SAC (Chiltern Beechwoods). Considers that there is sufficient policy protection.	No Action Required.
The LDF process will not directly influence management unless the type of development is directly management related.	No Action Required.

<p>The SAC consists of two SSSIs (Tring Woods and Ashbridge). Potential impacts depend on proposals, but could include:</p> <ul style="list-style-type: none"> - Outright destruction from built development. - Destruction and fragmentation from new roads or other transport links. - Damage from water abstraction (spring sources), air pollution, chemical pollution from road run off. - Destruction from provision of visitor facilities such as car parks, cycle paths, bridleways, sports facilities such as floodlighting etc. - Impacts from leisure/business facilities such as horse liveryes with increase in use of bridleways. - Increased pressure from human disturbance. - Potential difficulties in managing deer/squirrel populations. 	<p>Impacts on the SAC considered as part of the HRA.</p>
<p>PPPs not mentioned:</p> <p>National: Local Sites Guidance on their identification, Selection and Management (2006). Regional: Regional Cultural Strategy, Regional Biodiversity Opportunity Mapping, Green Arc. County: Hertfordshire Biodiversity Action Plan (updated 2006). Local: Habitat Survey for Dacorum Borough (1997, updated annually), Dacorum Urban Nature Conservation Study (2006).</p>	<p>PPP amended as appropriate.</p>
<p>Agriculture and land management should be mentioned, as it influences the nature and character of the majority of open land in the borough.</p>	<p>Agriculture considered under soils.</p>
<p>Issues of primary importance are those related to global issues, such as climate change and water resources.</p>	<p>Noted.</p>
<p>SEA topics are likely to represent a reasonable framework for DPD assessment. However will depend on how assessment takes place.</p>	<p>No Action Required.</p>
<p>Assessment Indicators need further work to make them 'SMART'. Populations of wild birds are too vague. Semi-natural habitat lost to development needs defining. Semi-natural habitat created- limited gains are expected through the planning process. Progress could be measured by achievements through agri-environment schemes. Wildlife sites affected by water abstraction- no definition exists and no monitoring is being undertaken.</p>	<p>All assessment indicators have been revised.</p>

Loss/damage to SSSIs- how is this to be determined. Numbers of species at risk needs refining. - Area of semi-natural has been measured once, is unlikely to be measured again.	
The water criteria needs to be refined (e.g. quality, flow and nitrate levels should have separate criteria). The indicators ought to be directly related to measuring the criteria.	All three issues have been considered as part of the assessment.
Safeguarding high quality agricultural land is not the issue, soil management is.	Noted.
Hertfordshire County Council	
Issues to include in Table 30: Landscape. - How to sustain the Chilterns AONB. - How to derive an urban landscape character assessment as a basis for townscape management. - How best to manage change in local landscape character. - How to increase contribution of trees and conserve critical assets: historic parks and gardens.	Noted.
Reference should be made to: Hertfordshire County Council's Structure Plan Alterations 2001-2016. Dacorum Landscape Character Assessment, Strategy and Guidelines document.	PPP amended as appropriate.
Page 21 and 22: Reference should be made to Historic Parks and Gardens being considered by English Nature for inclusion on the Register. LDF to include policies to conserve Historic Parks and Gardens.	The number of historic parks and gardens is provided.
It is not clear why the National Trust has been singled out.	National Trust properties have been referenced as they are considered buildings with local importance.
Page 24-26: Both urban and peri-urban landscapes need consideration. Reference should be made to how local landscape character is handled. Lack of reference to urban landscape data gaps and an over-emphasis on national character assessment. Area numbering and source/copyright data should be added to figure 10.	Baseline amended.
Page 9: SEA/SA to recognise the Chilterns AONB and Historic parks and gardens.	Both are considered within the baseline of the SA.
Page 18 and Table 30: Little reference to tree cover and (Table 30) woodland cover.	Baseline and issues table amended.

The relationship between tree and woodland cover and carbon sequestration needs highlighting. Trends in tree and woodland cover and how best the development process can conserve tree and woodland cover.	
Page 35 and Table 30/Landscape: Important to recognise the broader links between green infrastructure and health and well-being through offering visual relief, privacy, carbon sequestration, shelter, screening, green networks. Planning process can influence this through support for tree and woodlands, biodiversity and landscape enhancement.	Issues table amended.
Table 4.2: Management of landscape change is important.	Noted.
Further indicator: Proportion of local landscape character areas with characteristics intact or enhanced in relation to 2002/2004 baseline data.	Additional landscape indicators have been added.
Table 4.2: Add indicator regarding tree planning: Change in urban tree canopy cover.	To be considered when monitoring measures are finalised.
Local Councillor	
Page 57: The character of Dacorum's conservation areas needs protecting and enhancing.	Noted.
Economic pressure on farming is detrimental to the landscape in that it encourages activities such as fenced paddocks for 'horsiculture'	Noted.
The interrelationship between water availability and other sustainability objectives is not made. E.g diminishing water table could affect biodiversity, river flow and the amount of new housing that could be permitted.	Table updated.
Term townscape to be added to Landscape SEA objective title. Reference should be made for the need to maintain and enhance the appearance of the villages of the borough.	Amended.
Indicator for light pollution should be incorporated.	Reference to CPRE's light and tranquilly mapping has been added.
Major concern regarding the assessment indicators, work would be impractical as so much data would be required.	Noted and indicators have been refined. Key indicators only would be used for future monitoring purposes.
Hertfordshire County Council	
A full screening of the Appropriate Assessment must be undertaken and the associated	An HRA screening exercise has been

consultation needs to be carried out.	undertaken.
<p>Should refer to:</p> <ul style="list-style-type: none"> - Regional Environmental Strategy - Integrated Regional Strategy - Regional Sustainable Development Framework - SEA's of RSS14, LTP2, Minerals and Waste Management Strategy, Minerals Local Plan. 	PPP amended as appropriate.
2.3.1: The air quality figures are derived from towns which are smaller than Dacorum. Towns with similar characteristics similar to Dacorum should be used.	The choice of town was not controlled by C4S.

2 Supplementary Issues and Options – Growth at Hemel Hempstead (Nov. 2006)

Whilst there were no comments directly on the content of the SA/SEA Working Note that accompanied the consultation, two respondents made general references to the document.

Summary of Comments	How the comments have been taken on board
Government Office for the East of England	
<p>The Government Office for the East of England welcomed the Working Note, but had two concerns:</p> <ul style="list-style-type: none"> • Were the constraints and opportunities set out in Table 2 the same as the Sustainability Appraisal Framework established through the Scoping Reports? The Sustainability Appraisal Framework should be used as the basis for testing all reasonable options. 	<p>The SA objectives developed through the scoping report were used to inform the process of developing the constraints and opportunities presented in Table 2. As the assessment was dealing with specific areas of land a more detailed and spatially specific series of criteria were required for assessment than those provided by the original framework.</p>
<ul style="list-style-type: none"> • It was unsure whether there was a robust justification for not pursuing housing locations 1 (Bunkers Park), 5 (Boxmoor), 7 (Gadebridge North), 10 (East of Buncefield) and 13 (North of Grovehill and Woodhall Farm). 	<p>The role of the sustainability appraisal as reported in the SA Working Note was to identify the sustainability implications (positive and negative) of developing housing and associated infrastructure at the series of locations. The justification for pursuing (or not) with locations is provided as part of the wider technical work that supports the Core Strategy, as informed by the SA.</p>
House Builders' Federation	
<p>The House Builders' Federation gave a broad response. It quoted PPS3 and the requirement to undertake a Sustainability Appraisal to develop and test various options, considering, for each, the social, economic and environmental implications, including costs, benefits and risks. The document should be compatible with Circular 5/05 on Planning Obligations. The financial implications of such requirements could affect development viability and lead to less housing coming forward, contrary to a key sustainability objective. In addition, ensuring that everyone has the opportunity of a decent home should mean the needs of everyone should be met, not just the minority unable to satisfy their own needs.</p>	<p>The SA considered the implications of developing housing at the different locations as well as providing a commentary relating to the sustainability effects associated with the other more strategic issues and options considered in the document. The more general (non location-specific) issue of the levels of housing to be provided in the Borough has been appraised at other earlier and later stages of the Core Strategy.</p>

3 Emerging Core Strategy (June 2009)

One comment on the Sustainability Appraisal Working Note was received.

Summary of Comments	How the comments have been taken on board
Gleeson Strategic Land Limited	
<p>Gleeson Strategic Land Limited voiced some concern with the sustainability objectives.</p> <ul style="list-style-type: none"> • They should not be framed to restrict sustainable development, simply because it is greenfield. • Social issues have been given less consideration, although Government advice places emphasis on delivering mixed communities. • The number of objectives may mean there would be conflict with development proposals; consequently objectives should be weighted. 	<p>The sustainability objectives were developed from wide ranging consultation and have taken account of environmental, social and economic issues.</p> <p>The SA objectives do not restrict development on greenfield sites, but do encourage the effective use of previously developed land.</p> <p>There are a larger number of environmental objectives in order to ensure that the requirements of the Strategic Environmental Assessment Regulations are met. However the social objectives are broad and encompass a range of issues under each objective.</p> <p>The objectives are not weighted and no adding of objectives scores has been used in the assessment.</p> <p>The assessment findings simply report the predicted effects against each of the SA objectives.</p>

4 Comments on Draft Core Strategy SA Report (November 2010)

Summary of Comments	How the comments have been taken on board
English Heritage	
<p>Appendix B 1.4 Cultural Heritage</p> <p>The baseline information referred to in para 1.4.2 would be strengthened by reference to the Extensive Urban Survey reports available on the Historic Environment Record. These reports can provide a helpful foundation for the place strategies and site allocations. The English Heritage data on buildings at risk provides data on grade I and II* listed buildings only. This should be supplemented by information on grade II listed buildings collected locally. Mapping historic environment assets at a strategic scale can be difficult but we suggest that conservation areas can readily be included in Figure 4.</p>	<p>Some update to the baseline in relation to the Urban Survey has been made. Other comments noted for future SA assessment.</p>
<p>Appendix F: Hemel Hempstead</p> <p>Note on page F5 that the potential for housing and other developments to adversely affect known or undiscovered heritage assets is recognised. The appraisal of the suitability of sites should be informed by archaeological evaluation, where potential archaeological interest is identified, in accordance with PPS5. The county archaeologist should be consulted on this and other greenfield sites.</p>	<p>This is an issue for the more detailed Site Allocations DPD</p>
<p>Note that the potential impact of site LA2 on the Old Town conservation area is identified on page F16 in relation to 'historic and cultural assets'. While the allocation does not extend into the open countryside we feel the assessment against 'landscape and townscape' fails to recognise the contribution of the unspoilt valley landscape to the quality of the interface with the Old Town.</p>	<p>Assessment updated to take this comment into account.</p>
<p>Berkhamsted</p> <p>The assessment on page F24 shows a potential negative impact for cultural heritage. It is not clear if appropriate archaeological assessment has been provided to inform the judgement.</p>	<p>No archaeological assessment was used. The assessment was based on the fact that the area falls within an "area of archaeological significance". Advice from County Archaeologist has already been incorporated into the 'Assessment of Local Allocations and Strategic Sites' (Oct 2010).</p>

<p>Tring</p> <p>The site to the west of Tring is appraised on page F26. The proximity of the Roman road and Icknield Way may suggest archaeological interest. We suggest the advice of the county archaeologist should be sought to inform the assessment.</p>	<p>Advice from County Archaeologist has already been incorporated into the 'Assessment of Local Allocations and Strategic Sites' (Oct 2010).</p>
<p>Entec</p>	
<p>The SA acknowledges that the eastern strategy in combination with the EHAAP, should they both proceed, could have cumulative positive effects on the economic and social objectives through the provision of employment, leisure and housing in close proximity, plus improvements to the transport infrastructure and positive effects in terms of sustainability appraisal objectives. The SA needs to have considered all options individually, for instance NE Hemel Hempstead should have been considered as an option rather than just as part of a wider option including other sites/broad development areas. Consideration of sites individually would pick up on issues that are specific to the site, for instance developing further at West Hemel Hempstead may lead to more cross to travel that would be reduced/balanced by including land to the east of Hemel Hempstead.</p>	<p>No change required. The SA did consider all options separately when it was undertaken in August 2009. The results of these assessments are summarised in sections 5.4 – 5.6 of the SA Report.</p> <p>The text in 6.3.4 (of the previous SA Report, Nov 2010), on which this comment is based, took the assessment further to consider the how the Core Strategy would link with the Area Action Plan.</p>
<p>Markyate Parish Council</p>	
<p>Appendix E: We have noticed on maps on pages E23 and E24 that the number of houses for Markyate is shown as 140, not 190. We do not understand this discrepancy.</p>	<p>This is a typographic error. The 140 figure relates to the approximate number of units that have either been built or identified through the Council's housing studies. The 190 figure takes into account the inclusion of a higher level of housing on the Hicks Road site and is the total anticipated housing figure for the village over the plan period. These maps have now been removed from the SA Report.</p>
<p>Appendix F: 6.1.5 repeats the 140 houses figure mentioned in policy assessment E above. Again the benefits from the Hicks Road development are stretched. This acceptance of the poor public transport connections and the use of cars must be followed by the acceptance for adequate parking, above national guidelines.</p>	<p>See above regarding the housing figure.</p> <p>Parking and access issues are considered in the Core Strategy and associated Masterplan for the Hicks Road site. The development requirements for the site (Proposal SS2) includes replacement public car parking to serve the village, existing commercial uses</p>

	and new surgery as part of the redevelopment. The precise levels of car parking requirement will be a matter for the planning application.
6.1.11 - This talks of preserving the Cell Park landscape – it is the Manor Farm development already permitted, that will affect Cell Park. Even without the tall trees lining the A5, you would have to build very high at Hicks Road to even see Cell Park.	Noted.
<p>6.1.12 - Consider that the health benefits arising from the provision of the public space at Hicks Road have been over-emphasised. If the survey requirement for leisure use is translated into active leisure provision this will be far more healthy. Also, if the Doctor’s surgery is expanded into a Health Centre and the other services like dentist etc are provided it should not only help keep people healthy, it will also help with reducing greenhouse gas emissions and improving air quality as there will need to be fewer journeys to access these facilities elsewhere, almost inevitably by car. (Any hospital is at best a two bus journey from Markyate). As commented earlier:</p> <p>Noise nuisance from the commercial operations and the A5 would suggest that the noisiest businesses be sited next to the A5, with the new Heath Centre and car parking providing a buffer for the housing.</p> <p>It should be noted that the other housing close to the A5 and the industrial area has all been developed after they were there!</p> <p>Hicks Road is one of the two permitted lorry accesses to the village from the A5. The main part of the High Street is restricted to lorries with business there. The safe passage of traffic from the A5 must be maintained or improved. Any chance of traffic backing onto the A5 because it cannot progress onwards must be avoided. Pickford Road is a well used route to and from the village, and much uses Hicks Road to access or leave the A5. Any development at Hicks Road must take this situation on board and address the issue so that traffic congestion and conflict does not occur.</p> <p>[Additional comments, not related to the SA, were made.]</p>	<p>The health benefits predicted were not just based on this factor but also took account of improvements to walking and cycling provision.</p> <p>Comments noted.</p> <p>Comments noted for the Core Strategy. Discussions are ongoing with Hertfordshire County Council, the Highway Authority and the developers with regard to access and highway safety issues.</p>
Dennis Harvey	
Policy CS16 – Retail development should have public transport. Does not agree that “no change is necessary to the policy”. There has to be a way of linking any development, retail or housing, to a provision of public transport. It is not acceptable to have a view that the Council has no jurisdiction over mandating public transport. It is in the vision so the Council must find a way of making it happen at the same time as the development.	<p>Comments noted but no action required.</p> <p>The County Council are the authority responsible for bus services, together with private bus providers. Section 10 of the Core Strategy sets out the Council’s policy</p>

	<p>approach to access between homes, jobs and facilities, which includes retail facilities.</p> <p>Policy CS8 requires all new development to contribute to a well connected and accessible transport system. This includes public transport.</p>
<p>The sustainability appraisal includes a statement on sustainable communities relating to consumption and production and economy. I do not see anything in the document which ensures that this happens. There is also a statement to protect natural resources. For a community to be sustainable it cannot use resources faster than they are replenished. For a community to have a sustainable economy it must not spend more than it receives for its trade. If more dwellings are planned, there should be land allocated, within walking distance, large enough to grow sufficient food for that dwelling, if the land with the dwelling is not sufficient.</p>	<p>The SA includes objectives relating to these issues and the assessment has identified how the Core Strategy would help (or hinder) towards the achievement of these objectives. The SA itself cannot ensure that the objectives are met.</p>
<p>The SEA includes the requirement to consider population – I do not see anything in the document to address population directly: i.e. is the absolute number of people in the borough a good or a bad thing. Generally I believe that more people are a bad thing for sustainability but there is no such statement to plan to keep the number of people the same or lower.</p>	<p>The SA has considered how the Core Strategy would meet the needs of the predicted changes in population.</p>
<p>The SEA includes the requirement to consider the climate – I do not see anything in the document to directly address this. There needs to be something to restrict the use of materials or processes which could have an effect on the climate. The document could include a requirement that all dwellings have at least one form of sustainable energy source (as in some European countries) and a requirement that any businesses have a similar form of sustainable energy source. This should apply to all council buildings.</p>	<p>The SA includes objectives relating to these issues and the assessment has identified how the Core Strategy would help (or hinder) towards the achievement of these objectives. Recommendations have been provided throughout the SA process as to how the Core Strategy can take into account issues relating to climate. These are reflected in the text of section 19 of the Core Strategy.</p>
<p>The SEA includes the requirement to consider water: Opportunities from the Sustainability Report not written into the draft core strategy.</p> <p>Consider overall siting of development schemes in order to minimise potential effects on water quality.</p> <p>Encourage the use of Sustainable Drainage Systems in new developments</p> <p>Ensure efficient use of water resources in development schemes, this includes the use of</p>	<p>Comments more in relation to the Core Strategy than the SA.</p> <p>No change required. Section 19 of the Core Strategy (Using Resources Efficiently) already includes appropriate requirements relating to minimising water consumption,</p>

<p>recycled water. New developments should incorporate rainwater use. Ensure new polluting processes are located in areas where groundwater is not vulnerable. There is no direct statement to say how the above are going to be forced to happen.</p>	<p>and dealing with issues of water supply, surface water, foul drainage and the use of sustainable drainage systems. The issue of delivery is also covered in section 19 of the Core Strategy and includes reference to partnership working with the Environment Agency, Thames Water and Veolia Water. Delivery of these policies will be supported by the Council's Sustainable Development Advice Note (March 2011)</p>
<p>Key issues from the Sustainability Report but solutions not written into the draft core strategy: The River Gade: overall status is bad (ecological status is moderate, chemical status is failing). Over abstraction of water resources is an issue in the regions. The Chilterns Chalk Streams are particularly susceptible to over abstraction. The Environment Agency has already stated that we are running out of water in the region. This means that our present system is not sustainable. To add more consumers or businesses into the region is therefore going to make the situation worse. We can not create water. We are using it faster than it is being replenished. The limiting capacity of the existing sewage treatment works has been identified but it can only process the sewage if it has sufficient water. There is no point in increasing the sewage treatment capability if there is no more water.</p>	<p>Comment more in relation to the Core Strategy than the SA. See above response regarding Core Strategy.</p>