

Strategic Environmental Assessment for St Stephen

Environmental Report to accompany
Regulation 14 consultation
on the Neighbourhood Plan

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Quality information

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Non-Technical Summary

What is strategic environmental assessment?

A strategic environmental assessment has been undertaken to inform the St Stephen Neighbourhood Plan (SSNP). This process is required by the SEA Regulations.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability / environmental objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental and socio-economic effects through the Neighbourhood Plan and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

What is the St Stephen Parish Neighbourhood Plan?

The St. Stephen Parish Neighbourhood Plan presents a plan for the administrative area of the Civil Parish of St. Stephen for the period 2019-2036. Prepared to be in conformity with the saved policies of the St Albans City & District Local Plan but also having regard to the emerging St Albans and District Local Plan (SACDLP) 2020 to 2036. It sets out a vision and a range of policies for the Neighbourhood Plan area. These relate to a range of topics, including, but not limited to, housing, open space, recreation, and community amenities.

Purpose of the Environmental Report

The Environmental Report, which accompanies the current consultation on the SSNP, is the second document to be produced as part of the SEA process. The first document was the SEA Scoping Report (September 2019), which includes information about the Neighbourhood Plan area's environment and community.

The purpose of the Environmental Report is to:

- Identify, describe and evaluate the likely significant effects of the SSNP and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the SSNP and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability / environmental issues;
- The SEA Framework of objectives against which the SSNP has been assessed;
- The appraisal of alternative approaches for the SSNP;
- The likely significant environmental effects of the SSNP;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the SSNP; and
- Potential monitoring measures.

Scoping

The scoping stage involves the collection of information relating to:

- the state of the environment in the plan area; *and*
- relevant objectives and targets set out within plans, policies and programmes.

This information allowed for a range of key issues to be identified, and to establish what topics should be the focus of the SEA. The scoping process led to the following topics being scoped in or out of the SEA. These topics then formed the basis of a SEA Framework, which is the basis for appraising the Plan (and reasonable alternatives).

- Air Quality – **Scoped out**
- Biodiversity – **Scoped in**
- Climatic factors; adaptation and resilience – **Scoped in**
- Historic environment – **Scoped in**
- Landscape – **Scoped in**
- Land, soil and water resources – **Scoped out**
- Population and housing – **Scoped in**
- Health and wellbeing – **Scoped out**
- Transportation – **Scoped in**

Assessment of alternative approaches for the SSNP

The Plan proposes to allocate six sites for housing development (excluding strategically allocated sites). To inform the decision on which site to allocate, the Parish Council identified a range of site options. These sites were appraised as part of a site selection process.

The highest performing / ranking sites selected for allocation are listed below

Highest performing housing sites

Site Name	Approximate number of Dwellings
Land at Orchard Drive, Park Street	30
Land at Park Street Baptist Church between Tippetdell Lane and Orchard Drive	60
Land south of Park Street Lane, Park Street	30
Land to rear of Bucknalls Drive, Bricket Wood	14
Land at Frogmore, A5183, Park Street.	5
Burston Garden Centre	200 (C2 use class retirement village)

Assessment of the current version of the SNP

A draft SSNP, dated January 2020, which will become the version for submission to the LPA under Regulation 15 of the Neighbourhood Plan Regulations 2012, has been appraised against each of the

environmental objectives in the SEA Framework. In undertaking the appraisal, each of the policies in the Plan has been considered individually and collectively. A summary of the findings is presented below.

The plan is predicted to have mostly positive effects, with mixed (minor positive and minor negative effects) for three objectives. A significant positive effect is predicted for one objective.

With regards to environmental factors, the Plan involves a number of positive policies that identify locally important features with regards to biodiversity and heritage. However, residual minor negative effects on Biodiversity, Historic Environment and Landscape are predicted. These primarily relate to the allocation of a site for a new retirement village development on previously developed land in the green belt (Burston Garden Centre site) and policies supporting the expansion of existing employment and village retail sites. As they stand the policies pertaining to these issues are not sufficiently robust to ensure they do not lead adverse impacts on Biodiversity, Historic Environment and Landscape.

The main benefits of the Plan relate to communities, as the delivery of new homes to fulfil evidenced community need and high quality, sustainable, design will support the local population.

<i>Biodiversity</i>	<i>Climate change</i>	<i>Historic Environment</i>	<i>Landscape</i>	<i>Population and Housing</i>	<i>Transport</i>
Minor +ve Minor -ve	Minor +ve	+ve Minor -ve	Significant +ve Minor -ve	Significant +ve	Minor +ve

(Key: +ve=Positive, -ve=Negative)

One reasonable alternative has been identified at this stage of the SEA; a high growth alternative which allocates more sites for housing has also been assessed. The high growth alternative did not perform as well as the SSNP scenario, scoring a significant negative on Biodiversity and minor negative on climate change, landscape and transport but performed very well (significantly positive) for population and housing as it has the potential to deliver the entire locally assessed housing need over the plan period.

Mitigation

Through the SEA process, a number of recommendations are revealed to enhance the positive effects of the plan and mitigate any negatives. These are summarised below:

- Policy S1 does not currently include reference to biodiversity and the historic environment, important topics in the SA framework. This policy could be strengthened by including additional clauses to proffer protection and enhancement (where appropriate) to existing Biodiversity (to achieve net gain) and heritage assets in the Parish.
- Policy S20 could seek to support habitat conservation and enhancement and deliver net gains for biodiversity. As a site specific policy, it is recommended that the policy makes it clear that proposals for the site are subject to other relevant policies of the plan in particular S5 (minimising the environmental impact of development), S4 (design of development) and S6 (protection of natural habitats).
- Consider the inclusion of a policy which seeks to encourage renewable energy infrastructure.
- Consideration should be given to the potential for rural exceptions sites in terms of helping to meet affordable housing needs.
- Consider an alternative location for the retirement village proposed under Policy S20. Whilst any such site is still expected to be in the green belt (due to lack of non-green belt sites) there may be other parcels of green belt land that potentially have lesser impacts on the five green belt purposes.

It is considered that the above changes would help to improve the performance of the Plan with respect to the sustainability framework.

Monitoring

There is a requirement to present measures that could be used to monitor the effects of the Plan identified through the SEA. It is particularly important to monitor effects that are predicted to be significant, whether this be positive or negative. Monitoring helps to track whether the effects turn-out as expected, and to identify any unexpected effects.

Significant effects	Monitoring measures
A significant positive effect is predicted for population and housing as the Plan will contribute towards meeting local housing needs in accessible locations.	<ul style="list-style-type: none">• Net housing completions per annum• Number of homes for older people• Affordable housing target achievement

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1. Introduction

1.1 Background

AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging St. Stephen Neighbourhood Plan (SSNP).

The SSNP is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2012. The Neighbourhood Plan area, which comprises the administrative area of the civil parish of St. Stephen, is being prepared in the context of the saved policies of the St Albans City & District Local Plan and also having regard to the emerging St Albans and District Local Plan 2020 to 2036.

A Regulation 14 Consultation on the draft Plan is expected to take place in 2020. The local planning Authority's (St Albans District Council) screening opinion of May 2019 concluded that "there is evidence to suggest the potential for significant effects to arise as a result of the plan and that SEA should be applied". The findings of the SEA process are set out in this Environmental report.

Key information relating to the SSNP is presented in **Table 1.1**.

Table 1.1: Key facts relating to the St Stephen Neighbourhood Plan

Name of Qualifying Body	St Stephen Parish Council
Title of Plan	St Stephen Neighbourhood Plan (SSNP)
Subject	Neighbourhood planning
Purpose	<p>St Stephen Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Neighbourhood Planning (General) Regulations 2012.</p> <p>The SSNP will be in conformity with the saved policies of the St Albans City & District Local Plan but also having regard to the emerging St Albans and District Local Plan 2020 to 2036</p>
Timescale	2019 – 2036
Area covered by the plan	The SSNP will be used to guide and shape development within the area covered by the administrative area of the civil parish of St Stephen.
Summary of content	The SSNP will set out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point	<p>Isabel Crozier</p> <p>Email address: isabel@ststephenparishcouncil.gov.uk</p>

1.2 SEA explained

The St Stephen Neighbourhood Plan was 'screened-in' as requiring SEA.

SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding or mitigating negative environmental effects and maximising positive effects. Through this approach, the SEA for the SSNP seeks to maximise the emerging Neighbourhood Plan's contribution to sustainable development.

The SEA has been prepared in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive¹.

The SEA Regulations require that a report is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.

In line with the SEA Regulations this Environmental Report must essentially answer four questions:

- What is the scope of the SEA?
- What has plan-making/SEA involved up to this point?
 - 'Reasonable alternatives' must have been appraised for the plan.
- What are the appraisal findings at this stage?
 - i.e. in relation to the draft plan.
- What happens next?

These questions are derived from Schedule 2 of the SEA Regulations, which present 'the information to be provided within the report'. **Table 1.2** presents the linkages between the regulatory requirements and the four SEA questions.

¹ Directive 2001/42/EC

1.3 Structure of this Environmental Report

This document is the Environmental Report for the SSNP and hence needs to answer all four of the questions listed above with a view to providing the information required by the SEA Regulations.

Each of the four questions is answered in turn within this report, as follows:

Table 1.2: Questions that must be answered by the Environmental Report in order to meet regulatory² requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ³
What's the scope of the SEA?	What is the plan seeking to achieve?
	What is the sustainability 'context'?
	What is the environmental 'baseline'?
	What are the key issues & objectives?
What has plan-making/SEA involved up to this point?	
What are the assessment findings at this stage?	
What happens next?	

² Environmental Assessment of Plans and Programmes Regulations 2004

³ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

2. Local Plan context and vision for the SSNP

2.1 Local Plan context for the SSNP

St Stephen Parish Council took the decision to prepare a Neighbourhood Plan to enable the local community to influence the shape of development in the Parish.

The Parish Council felt that if development was going to have to happen in St Stephen, then its residents deserved the opportunity to say what this development should look like and to be involved in shaping the future of the Parish in which they live. The concept of a Neighbourhood Plan was promoted, and a Working Group formed. With professional help, funded by grant applications, the Working Group has produced a number of planning policies and community actions that will help shape future development in St Stephen.

A very positive 'side effect' of the plan has been the relationships created, developed and strengthened both in the villages and with many other organisations.

The Parish Council has been able to incorporate into the Neighbourhood Plan the views, opinions and aspirations of residents and businesses in St Stephen. Most importantly the Neighbourhood Plan shows the residents' vision for their Parish and for their future.

St Stephen Parish Council is within St. Alban City and District Council (SACDC). The currently adopted plan for SACDC; the District Local Plan Review 1994 (DLPR) will eventually be replaced by the emerging St Albans City & District Local Plan 2020-2036 (SACDLP). The latter underwent Examination in late 2019 but subsequently the examination hearings were suspended in January 2020. The inspector expressed concerns in relation to legal compliance and soundness and stated that they will reflect further on the issues of legal compliance, duty to cooperate, spatial strategy and the Green Belt and subsequently issue a more detailed letter to SACDC (not yet issued at time of writing this report).

The SACDLP Policy S1 classifies the individual settlements within St Stephen parish - Bricket Wood, Chiswell Green, How Wood, Park Street and Frogmore and Park Street Garden Village (a new strategic site allocation) – as "Large Villages - settlements excluded from the Green Belt". The scale and density of development in these sorts of settlements will generally be lower than in the Category 1 settlements. This is to reflect the lower level of services available and in order to retain their particular character.

Policy S2 of the SACDLP states that all Category 1 settlements and one Category 2 settlement (Chiswell Green) will be expanded at 'Broad Locations' for development. A new settlement, 'Park Street Garden Village', will be created and designated as Category 2 under Policy S1.

2.2 Vision for the St Stephen Neighbourhood Plan

The vision / mission statement for the SSNP, which was developed during earlier stages of plan development, is as follows:

“ This Neighbourhood Plan will go a long way to ensuring that in years to come St Stephen Parish will be a pleasant place to live, work and visit by:

- **Retaining the individual character of each village;**
 - **Protecting the Green Belt from inappropriate development;**
 - **Putting green and open spaces, trees and woodlands at the heart of planning;**
 - **Providing community leisure and recreation facilities to meet all residents' needs;**
 - **Ensuring housing developments include smaller, affordable properties for first-time buyers, to help keep younger people in the villages, and also provide properties tailored to the ageing population;**
 - **Ensuring that community facilities, such as health and medical centres, are within easy reach of all residents and there are sufficient education establishments for the young of the Parish to be able to attend without lengthy journeys by public or private transport;**
 - **Supporting an effective public transport service and convenient and safe routes to encourage walking and cycling;**
 - **Maintaining all existing rights of way and creating new ones to establish a linked-up network;**
 - **Managing traffic, traffic speed and reducing the number of vehicles travelling through the Parish's villages to other destinations;**
 - **Supporting local retail businesses and the commercial sector in general.”**
-

To support the Neighbourhood Plan's mission statement, the SSNP sets out a number of Neighbourhood Plan policies. The latest iteration of these policies has been appraised in Chapter 5 of this Environmental Report.

3. The Scope of the SEA

3.1 SEA Scoping Report

The SEA Regulations require that: *"When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies"*. In England, the consultation bodies are Natural England, the Environment Agency and Historic England.⁴ These authorities were consulted on the scope of the SSNP SEA for a 5 week period from 18th October 2019.

The purpose of scoping was to outline the 'scope' of the SEA through setting out:

- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
- Baseline data against which the Neighbourhood Plan can be assessed;
- The key sustainability / environmental issues for the Neighbourhood Plan; and
- An 'SEA Framework' of objectives against which the Neighbourhood Plan can be assessed.

Two one of the statutory consultees provided a formal response to the Scoping Report within the five week consultation period. The comments made and how they have been considered and addressed, are presented in **Table 3.1** below.

Table 3-1: Consultation responses received on the SEA Scoping Report

Consultation response	How the response was considered and addressed
Environmental Agency	No response
Natural England	The response did not include specific reference to the SSNP SEA Scoping report but included generic advice / guidance. This has been taken into consideration in the preparation of the SEA.
Historic England	The response did not highlight specific issues but referred to Historic England Advice Note 8 for guidance; https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/ . The guidance has informed the SEA process.

3.2 Key sustainability / environmental issues

The full Scoping Report is attached as **Appendix A** to this report. This section sets out a summary of the key issues that were identified through scoping.

Drawing on the review of the policy context and baseline information, the SEA Scoping Report was able to identify a range of sustainability / environmental issues that should be a particular focus of SEA. These issues are as follows, presented by eight environmental themes:

⁴ In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because 'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme'.

The selected environmental themes incorporate the 'SEA topics' suggested by Annex I(f) of the SEA Directive⁵. These were refined to reflect a broad understanding of the anticipated scope of plan effects (drawing from the screening opinion and local knowledge).

The scoping process allowed for some sustainability topics to be 'scoped out'; as it was considered the Plan is unlikely to have significant effects on certain factors.

3.2.1 Air quality

- There is one Air Quality Management Area within the Neighbourhood Plan Area. No exceedance of the national air quality objectives has been reported here.
- Whilst additional development in the NP area has the potential to increase vehicular emissions, the scale of the development proposed in the NP is such that it is unlikely to have a significant effect on air quality. Furthermore, the NP is not proposing to allocate any housing in the vicinity of the AQMA.

Scoped out

3.2.2 Biodiversity

- Bricket wood Common and Moor Mill quarry SSSIs are within the Neighbourhood Plan Area. There is also a geologically important, previously designated SSSI, Chalk Cliff (old pit) off Featherbed Lane.
- The Neighbourhood Plan area does not contain Priority Habitat areas.
- There are no NNR, LNR, SACs, SPAs, or Ramsar sites within or in the vicinity of the Neighbourhood Plan area.
- There are several Local Wildlife Sites within the Neighbourhood Plan area.

Scoped in

3.2.3 Climatic factors

- Mitigation of and adaptation to climate change are national and local priorities that the Plan should seek to contribute towards. However, the SSNP has limited scope to address Climate Change Mitigation.
- There are areas within the Plan area at risk of fluvial flooding and surface water flooding. The Neighbourhood Plan area falls predominantly within Flood Zone 1, although a stretch of Flood Zone 2 and 3 runs along the Ver and Colne rivers.

Climate Change mitigation Scoped out

Climate Change adaptation Scoped in

3.2.4 Historic environment

- The Neighbourhood Plan area contains a considerable number of heritage assets including Listed Buildings and Structures and two conservation areas, which could be affected by policies and proposals within the plan (either positively or negatively).

⁵ The SEA Directive is 'of a procedural nature' (para 9 of the Directive preamble) and does not set out to prescribe particular issues that should and should not be a focus, beyond requiring a focus on '*the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors*' [our emphasis]

- An inappropriate approach that does not seek to conserve and enhance heritage assets could result in the erosion of the townscape quality.
- There is potential for significant effects upon the setting of heritage assets and the character of the built and natural environment.

Scoped in

3.2.5 Landscape

- There is potential for future development to impose significant effects upon the character of landscapes, which also contributes to the rural setting of the village.

Scoped in

3.2.6 Land, soil and water resources

- The topic of Land, soil and water resources has been scoped out, as the Plan is unlikely to have a significant effect on soil / agricultural land and water quality.
- There are important soil resources in the Plan area that ought to be avoided as much as possible. However, the total loss of land is unlikely to exceed 7 ha (given the scale of growth likely to be involved in any site allocations), and so a significant effect upon soil resources is considered unlikely in any event.
- Higher quality agricultural land should be protected, and such principles will need to be addressed through the site assessment process.
- It is unlikely that significant effects upon water quality would occur as a result of the plan as the scale of growth is not major, and changes to land use would not be anticipated to increase nitrate pollution. With regards to waste water treatment and drainage, the scale of growth would not be expected to cause issues. And for these reasons, soil, water and waste are scoped out.

Soil – Scoped out

Water – Scoped out

Waste – Scoped out

3.2.7 Population and community

- The population of St Stephen Parish has increased by a moderate 2.2% between 2011 and 2017. However, the developments planned at strategic level and the two new developments currently being implemented will produce a significant increase in population.
- Population trends in the Neighbourhood Plan area show an increasingly aging population. The proportion of residents in the 65+ age group is significantly higher than regional and national average. The implications of this will need to be carefully considered and planned for.

Scoped in

3.2.8 Health and Wellbeing

- The Plan area has broadly healthy population with higher than average life expectancy. There are several health care facilities in the area.
- There NP area has substantial green space and open space.
- The area enjoys lower than average levels of deprivation.

Scoped out

3.2.9 Transportation

- The Neighbourhood Plan area is well served by the highway network, but railway and bus connectivity are in need of improvement to cope with current and future demands.
- Local residents in the Neighbourhood Plan area are significantly more likely to travel by car when compared to St Albans as a whole.
- New development is likely to increase traffic and congestion but could also make public transport improvements more viable.
- Policies and proposals in the Plan should seek to enhance accessibility and ensure that impacts upon traffic are minimised.

Scoped in

3.3 SEA Framework

The SEA framework has been established through the identification of key issues and environmental objectives as part of the scoping exercise. This draws upon the baseline position and policy context that has been prepared for a range of SEA topics.

The framework consists of a set of headline objectives and ancillary questions, which has been used to appraise the environmental effects of the draft Plan (and any reasonable alternatives).

Table 3.2 below outlines the full SEA Framework, which focuses on those issues that have been identified as the most important to consider in the preparation of the Plan; but acknowledging the limited influence that the Plan can/will have in some areas.

These issues were then translated into an 'SEA Framework'. This SEA Framework provides a methodological framework for the appraisal of likely significant effects on the baseline.

Table 3-2: SEA Framework for the St Stephen Neighbourhood Plan

SEA Objective	Supporting questions (Will the option/proposal help to..)
1. Biodiversity: Protect, maintain and enhance biodiversity habitats and species; achieving a net environmental gain and stronger ecological networks.	<ul style="list-style-type: none"> • Support connections between habitats in the Plan area? • Avoid any impacts on the Bricket Wood Common, Moor Mill SSSI and on the Chalk Cliff (old pit off Featherbed Lane)? • Support continued improvements to the designated sites in the Neighbourhood Plan area? • Achieve a net gain in biodiversity? • Support access to, interpretation and understanding of biodiversity? • Increase the resilience of biodiversity in the Neighbourhood Plan area to the effects of climate change?
2. Climate Change Adaptation: Avoid and manage flood risk and support the resilience of the St Stephen Neighbourhood Plan area to the potential effects of climate change.	<ul style="list-style-type: none"> • Improve green infrastructure networks in the plan area to support adaptation to the potential effects of climate change? • Sustainably manage surface water run-off, ensuring that the risk of flooding is not increased (either within the plan area or downstream) and where possible reduce flood risk? • Ensure the potential risks associated with climate change are considered through new development in the plan area? • Avoid placing development in areas that are at the greatest risk of flooding.
3. Historic Environment: Protect, enhance and manage the distinctive character and setting of heritage assets and the built environment	<ul style="list-style-type: none"> • Conserve and enhance heritage assets, their settings and the wider historic environment, whilst better revealing their significance? • Contribute to better management of heritage assets? • Identify and protect/ enhance features of local importance? • Support access to, interpretation and understanding of the historic environment?
4. Landscape: Protect, enhance and manage the distinctive character and appearance of landscapes.	<ul style="list-style-type: none"> • Conserve and enhance landscape assets whilst better revealing their significance? • Contribute to better management of landscape assets? • Identify and protect/ enhance features of local importance? • Support access to, interpretation and understanding of the surrounding landscape? • Improve linkages to open space and the countryside?

SEA Objective	Supporting questions (Will the option/proposal help to..)
<p>5. Population and Housing:</p> <p>Provide everyone with the opportunity to live in good quality, affordable housing which meets the needs of occupiers throughout their lives.</p>	<ul style="list-style-type: none"> • Support the provision of a responsive range of house types and sized to meet identified needs? • Provide quality and flexible homes that meet people's needs throughout their lives? • Create sustainable new communities with good access to a range of local services and facilities? • Enhance housing provision in existing communities?
<p>6. Health and Wellbeing:</p> <p>Protect and improve the health and wellbeing of residents by enhancing the quality and accessibility of open space, facilities for recreation and health.</p>	<ul style="list-style-type: none"> • Promote accessibility to a range of leisure, health and community facilities, for all age groups? • Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards? • Promote healthy and active lifestyles?
<p>7. Transportation:</p> <p>Support modal shift to active and sustainable modes of transport whilst reducing the need to travel.</p>	<ul style="list-style-type: none"> • Connect people effectively to the social, economic, educational, recreational and cultural facilities they require on a daily basis? • Promote sustainable patterns of land use and development that reduce the need to travel and reliance on the private car? • Increase the range, availability and affordability of sustainable travel choices i.e. public transport, walking, cycling? • Improve road safety? • Enable transport infrastructure improvements? • Avoid excessive strain or congestion on the transport network?

4. What has plan making / SEA involved to this point?

4.1 Introduction

In accordance with the SEA Regulations the Environmental Report must include:

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.

The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, this section explains how preparation of the current version of the SSNP has been informed by an assessment of alternative site options.

4.2 Overview of plan making / SEA work undertaken

The Parish Council have gathered a range of evidence, and undertaken consultation with communities and other key stakeholders to identify the issues and opportunities that need to be addressed in the Neighbourhood Plan.

The SEA process is being delivered by AECOM as part of the Locality Technical Support Programme.

The first step in the SEA Process was the development of a Scoping Report, which was published for Consultation in October 2019.

AECOM worked alongside the Parish Council to identify and appraise any reasonable alternatives, to ensure that the SEA helps to inform the approaches and policies within the draft Plan.

A draft Plan has been shared with AECOM, who have undertaken an appraisal of the Plan 'as a whole', taking into account each of the individual policies in combination. As part of this process, it is important to consider 'reasonable alternatives'.

4.3 Assessment of reasonable alternatives for the Neighbourhood Plan

A key element of the SEA process is the appraisal of 'reasonable alternatives' for the SSNP. The SEA Regulations⁶ are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the '*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*'.

The following sections therefore describe how the SEA process to date has informed the development strategy for the Neighbourhood Plan area. Specifically, this chapter explains how the SSNP's plan policies relating to housing and site allocations have been dealt with in the SEA.

4.3.1 Housing Strategy

Overall District level housing numbers (targets) are primarily the responsibility of the Local Planning Authority; St. Albans City and District Council (SACDC). The Neighbourhood Plan policies and site allocations must be in accordance with the strategic policies of the adopted Local Plan and have regard for policies of the emerging Local Plan. The Local Plan evidence base also provides a significant amount of information about potential development sites in St Stephen.

The currently adopted plan for SACDC; the District Local Plan Review 1994 (DLPR) will eventually be replaced by the St Albans City & District Local Plan 2020-2036 (SACDLP). The latter was submitted in

⁶ Environmental Assessment of Plans and Programmes Regulations 2004

March 2019 and underwent examination. However, the process was suspended by the inspector in January 2020. Therefore, at the time of writing it is not entirely known how the SACDCLP will be resolved.

On a strategic level, SACDC initially based its housing target on the Strategic Housing Market Assessment (SHMA) 2013 and the SHMA update of 2015. The latter gave a target figure of 436 dwellings per annum (dpa) for St Albans. Subsequently the Council revised the figures based on the government's standard method for assessing housing need and the latest draft of the SACDLP (publication draft 2018) has a target of 14,608 homes over for the period 2020-2036 or 859⁷ dpa for the District as a whole. The draft SACDCLP does not specify the amount of housing required within St Stephen and the NP group have not been given a housing figure to meet. Parishes are however encouraged to take this opportunity to allocate housing sites. It is worth noting the examiner's report for Wantage Neighbourhood Plan⁸ (paragraph 4.1) indicated that a plan which allocates no land for housing could potentially fail to meet the Basic Condition of promoting sustainability.

On a local level; a Housing Needs Assessment (HNA) for St Stephen was prepared by AECOM in August 2017. This examined a range of data including the SHMA 2013 and 2015 update and produced an unconstrained housing need figure of between 875-900 dwellings equating to 58-60 dpa. Whilst the majority of this can be met through strategic level growth (SACDCLP), the SSNP proposes to contribute to the housing targets set in the SACDLP by allocating sites for housing, based on locally assessed needs.

Are there any other reasonable alternatives?

The SSNP sets a target of 140 new homes and a 200 unit C2-use retirement (including specialist care) complex, to meet some of the locally identified needs.

In terms of housing numbers; the potential alternatives are;

- 1- To allocate the SSNP target of 140 new homes plus 200 unit C2-Use retirement village to contribute to the strategic housing targets and fulfil locally assessed need.
- 2- Not to provide any additional housing at neighbourhood level and rely on a future strategic allocation to fulfil local housing need.
- 3- To pursue a high growth strategy; by allocating more housing through the SSNP to meet local needs.

In its current form the SACDLP (2018 draft) allocates two sites as broad locations for growth within the NP area. These comprise Park Street Garden Village (2,300 dwellings) and Chiswell Green Urban extension (365 dwellings). The two combined will provide 2665 dwellings over the plan period. Therefore, this figure exceeds the locally assessed target in the AECOM HNA. These developments will also include new services such as schools, major transport improvements and care homes. However, the future of the Local Plan is currently uncertain, and these schemes may or may not come to fruition. For this reason, it may be reasonable to support a higher level of growth in the NP on 'non-strategic' sites.

The locally assessed (AECOM HNA) housing need figure of 58-60 dpa, produces a total unconstrained figure of 1044-1080 dwellings over the plan period (2019-2036). Since the AECOM HNA study; two new developments have been completed in the NP area; the BRE development in Bricket Wood (100 units) and the Lancaster Gate development at former HSBC training centre in Hanstead Park (138 units) providing a total of 238 new homes. When these recent developments are considered; the adjusted housing need figure becomes 806-842 over the plan period or 45-47 dpa.

Therefore, it is reasonable to aim for a higher growth target than the one currently proposed by the SSNP. This can potentially be achieved by allocating more of the smaller sites considered in the AECOM Site Assessment.

⁷ Rounded figure.

⁸ <http://www.whitehorsedc.gov.uk/sites/default/files/Wantage%20NP%20Report%20Final%2030.7.16.pdf>

Another potential alternative is not to allocate further housing in addition to those already proposed through the draft SACDLP. Given that the proposed approach in the NP involves Green Belt land release, this would appear to be a valid approach to test. However, with the future of the SACDLP currently unknown it is not possible to ascertain if these developments will materialise in the future. Furthermore, the SSNP steering group's consultation and the AECOM HNA report, confirmed that there is a local need for housing. Not providing any new housing at NP level would not promote sustainability in St Stephen, and in the absence of a Local Plan, would leave the Parish at greater risk of speculative development. Therefore, the alternative of not providing any NP level housing development is not considered to be reasonable.

In conclusion two reasonable alternatives will be considered;

1. The draft SSNP's proposed level of housing growth
2. A higher growth alternative which allocates a greater amount of housing development.

4.3.2 Site allocations

The 1994 District Local Plan Review set out a range of policies governing housing, and housing development in the St Albans City and District Area. Of these policies, a number were saved and are relevant to housing provision in St Stephen Parish. A key policy for the plan area includes:

Policy 2 'Settlement Strategy', which highlights a number of villages that are located within the St Stephen Parish area, including: Bricket Wood, Park Street/ Frogmore, How Wood, and Chiswell Green. These villages are defined as specified settlements and are therefore excluded from the Green Belt and considered appropriate for development.

Strategic policies within the current draft of the SACDLP (publication draft 2018) relevant to St Stephen include;

Policy S1 (Spatial strategy and settlement hierarchy) of the emerging SACDLP, sets out 4 settlement categories. The individual settlements within St Stephen parish; Bricket Wood, Chiswell Green, How Wood, Park Street and Frogmore and Park Street Garden Village (a new strategic site allocation) are classified as Category 2; "Large Villages - settlements excluded from the Green Belt". *The scale and density of development in these settlements will generally be lower than in the Category 1 settlements. This is to reflect the lower level of services available and in order to retain their particular character.*

Policy S2 (development strategy) states that of the *Category 2 settlements, only Chiswell Green will be expanded at 'Broad Locations' for development. A new settlement, 'Park Street Garden Village', will be created and designated as Category 2 under Policy S1.*

Policy S4 (housing strategy and housing requirement/target) sets out a housing target of 14,608 homes over for the period 2020-2036 or 913 homes per annum for the District as a whole.

Policy S6 x (West of Chiswell Green) proposes an urban extension at Chiswell Green. The development is to deliver 365 dwellings, of which 40% will be affordable. The site will also include a new school (2Fe), transport network (including walking and cycling links), public transport upgrades, community facilities and parklands/ open spaces. The scheme is also to include an appropriate renewable energy production and supply mechanisms.

Policy S6 xi (Park Street Garden Village Broad Location) proposes the provision of a 2,300 (previously site for the Radlett aerodrome) dwellings Garden Village at Park Street. This will include residential and/ or nursing homes, a Flexi-care scheme (50+ units) including special care needs accommodation, public open space, managed woodland improved rights of way, a new Country Park, 2 primary schools and a secondary school. The scheme will also include improved/ upgraded transport network (including walking and cycling links), improved public transport, a local bypass for Park Street and improvements to A414. A new Park and Ride rail facility at Abbey Railway Line south of A414 is also proposed. The policy adds that the possibility of an additional railway station on the Midland Mainline will be fully

explored. Like the Chiswell Green Urban Extension this scheme will include a 40% affordable housing element.

Policy L5 (Small scale development in Green Belt settlements) states that small scale development or redevelopment for a residential use, community facilities, services or small business within Green Belt settlement envelopes will be granted where proposals are in accordance with spatial strategy and settlement hierarchy (Policy S1) and the following set of criteria;

1. The land should be previously developed or part of a previously developed property area
2. Small scale development consisting of maximum of 10 dwellings or similar scale non-residential development
3. The site is an infill site though gaps may not be filled where they form an intrinsically important feature that contributed to the environmental character of the settlement or wider area.
4. The development should reflect the existing character of the settlement.

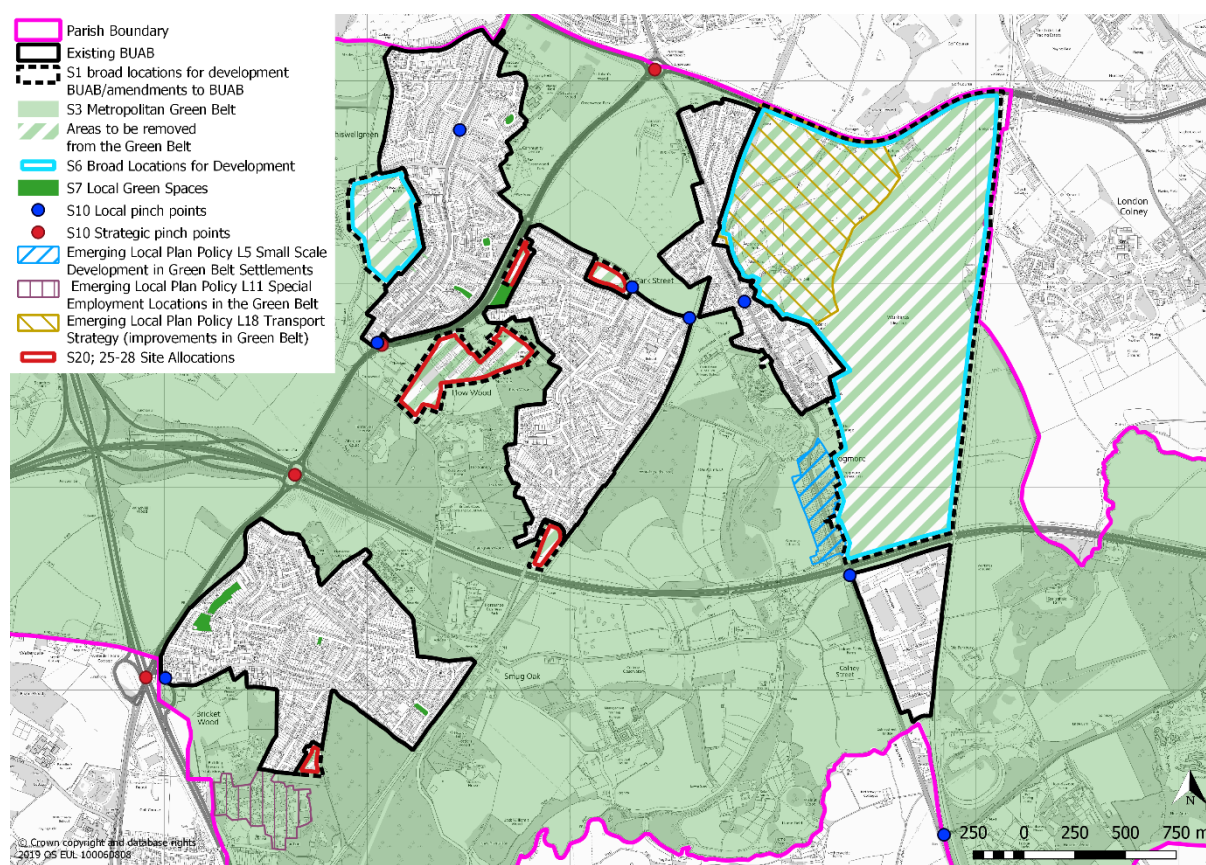


Figure 4.1 St Stephen Site Allocations including Strategic Allocations (SACDLP).

SSNP steering group has developed the NP through extensive engagement with the community and regular discussions with St Albans District Council. A number of sites have been identified by the community and their availability for development confirmed through a Call for Sites in March 2017.

4.3.3 Site assessment methodology

AECOM has undertaken an assessment of all 'available' and 'potentially available' sites to ascertain which sites are the most sustainable to allocate in the St Stephen Neighbourhood Plan. The assessment referred to the latest draft of the SACDLP available at the time; the Detailed Local Consultation Draft dated Nov. 2016 (DLP). This included Policy DLP12 (Neighbourhood Level Housing development in the

Green Belt) which stated; Sites for additional neighbourhood level residential development will be planned in the following way:

Affordable housing as a very special circumstance

Development of solely affordable housing within the Green Belt will be judged against all the following criteria:

- The development is genuinely small scale (normally no larger than 10 dwellings on a maximum site area of 0.5 Ha);
- The housing is provided in accordance with the current national policy definition of “affordable” and secured by appropriate planning obligations;
- The site is designated for housing in a Neighbourhood Plan;
- Harm to the purposes of the Green Belt is assessed as limited;
- The proposed development will generally reflect the appearance and rural character of the surrounding existing development;
- There is a close relationship between the proposed site and existing built up areas, either in settlements excluded from the Green Belt (SLP1) or included in Green Belt Settlement Envelopes (DLP 1). Substantial landscaping will be required.

Other neighbourhood level housing

- Neighbourhood level housing proposals that are not solely affordable housing, and/or are larger scale in terms of this policy, will be taken as supported by the local community if they are promoted in a ‘made’ neighbourhood plan. The neighbourhood plan proposal will be implemented through a Green Belt boundary change in future review of the SLP/DLP.

The supporting text adds that:

Housing development in the Green Belt is inappropriate unless specific exceptions apply (NPPF). Policy DLP 1 (Green Belt Settlement Envelopes) of this Plan provides guidance relevant to NPPF exceptions. The DLP also provided scope for additional neighbourhood level development (which would normally be taken as development consisting of a maximum of 30 dwellings) if supported by local communities. *‘Neighbourhood level housing proposals that are not solely affordable housing, and/or are larger scale in terms of this policy, will be taken as supported by the local community if they are promoted in a ‘made’ neighbourhood plan. The neighbourhood plan proposal will be implemented through a Green Belt boundary change in future review of the SLP/DLP.’*

St Albans DC had confirmed⁹ at the time, that the DLP was a draft document and there was flexibility within the wording of the policy to allow for sites that may provide above 30 dwellings. The site should still be considered as providing ‘neighbourhood level’ development. SADC also clarified this policy applies just to green belt sites. Suitable urban sites can also come forward through neighbourhood plans, and there is no threshold set for these.

The approach undertaken to the site appraisal is based primarily on the Government’s National Planning Practice Guidance (Assessment of Land Availability) published in 2014 with ongoing updates, which contains guidance on the assessment of land availability and the production of a Strategic Housing Land Availability Assessment (SHLAA) as part of a local authority’s evidence base for a Local Plan.

Although a Neighbourhood Plan is at a smaller scale than a Local Plan, the criteria for assessing the suitability of sites for housing are still appropriate. This includes an assessment of whether a site is suitable, available and achievable.

In this context, the methodology for carrying out the site appraisal is presented below.

⁹ Joanna Woof, Senior Spatial Planning Officer

4.3.3.1 Task 1: Identify sites to be included in assessment

The first task is to identify which sites should be considered as part of the assessment.

This included:

- all SHLAA sites that were assessed as being suitable, available and achievable for development; and,
- sites identified through SSNP Call for Sites.

There were a number of sites identified through SSNP Call for Sites that had already been assessed through the SHLAA. These sites were included under their SHLAA reference (prefixed by S) in the assessment. 'New' sites which had not already been assessed through the SHLAA were assigned a new reference prefixed by L. Any duplicate sites were not assessed.

4.3.3.2 Task 2: Development of site appraisal pro-forma

A site appraisal pro-forma was developed to assess potential sites for allocation in the Neighbourhood Plan. It has been developed based on the Government's National Planning Practice Guidance and the knowledge and experience gained through our Neighbourhood Planning site assessment. The purpose of the pro-forma is to enable a consistent evaluation of each site against an objective set of criteria.

A number of locally specific criteria were added to the pro-forma. These included:

- Distance from the edge of the site to a water course; and,
- Would any proposed (or potential) development involve land that could otherwise help to meet the objectives of Watling Chase Community Forest.

The pro-forma utilised for the assessment enables a range of information to be recorded, including the following:

- Background information:
 - Site location and use;
 - Site context and planning history;
- Suitability:
 - Site characteristics;
 - Environmental considerations;
 - Heritage considerations;
 - Community facilities and services;
 - Other key considerations (e.g. flood risk, agricultural land, tree preservation orders); and
- Availability

4.3.3.3 Task 3: Complete Site Proformas

The next task was to complete the site proformas. This was done through a combination of desk top assessment and site visits. The desk top assessment involved a review of the conclusions of the existing evidence and using other sources including google maps / Streetview and MAGIC maps in order to judge whether a site is suitable for the use proposed. The site visits allowed the team to consider aspects of the site assessment that could only be done visually. It was also an opportunity to gain an opportunity to better understand the context and nature of the Neighbourhood Plan area.

4.3.3.4 Task 4: Consolidation of results

Following the site visit, the desk top assessment was revisited to finalise the assessment and compare the sites to judge which were the most suitable to meet the housing requirement.

A 'traffic light' rating of all sites has been given based on whether the site is an appropriate candidate to be considered for allocation in the Neighbourhood Plan. The traffic light rating indicates 'green' for sites that show no constraints and are appropriate as site allocations, 'amber' for sites which are potentially suitable if issues can be resolved and 'red' for sites which are not currently suitable. The judgement on each site is based on the three 'tests' of whether a site is appropriate for allocation – i.e. the sites is suitable, available and viable.

The conclusions of the SHLAA were revisited to consider whether the conclusions would change as a result of the local criteria. It was decided that the local criteria, while useful for shortlisting sites for eventual selection, would not rule a site out as a potential allocation.

4.3.3.5 Indicative housing capacities

Where sites were previously included in St Albans Strategic Housing Land Availability Assessment (SHLAA) the indicative housing capacity shown in this document has been used.

If landowners / developers have put forward a housing figure, this has been used if appropriate.

Where a site capacity figure does not exist, a calculation of the number of units at a development density of between 30 and 45 dwellings per hectare has been applied.

4.3.4 Summary of Site Appraisals

In all, 22 sites were assessed, to consider if these would be appropriate for allocation in the SSNP. These included sites that were submitted through St Alban District Council's Local Plan Strategic Housing Land Availability Assessment SHLAA (Sites prefixed S) and found to be suitable, available and viable for development; and through St Stephen Neighbourhood Plan 'Call for Sites' (Sites prefixed L). Table 4.2 sets out a summary of the site assessments. This includes the SHLAA conclusions regarding each SHLAA site's 'developability' and the conclusions of the Neighbourhood Plan site assessment.

The final column is a 'traffic light' rating for each site, indicating crucially whether the site is appropriate for proposing for allocation under DLP policy DLP 12. Red indicates the site is not appropriate for allocation through the Neighbourhood Plan. Green indicates the site is appropriate for allocation through the Neighbourhood Plan. Amber indicates the site is less sustainable or may be appropriate for allocation through the Neighbourhood Plan if certain issues can be resolved or constraints mitigated.

The assessment concluded that there are five sites suitable for housing allocation. These were all considered to be 'neighbourhood level' housing. However, since the initial site assessment site S7 has been withdrawn by the owners and therefore no longer available. In its place the NP group added another previously assessed site S21 (Park Street Baptist Church/ land between Tippetdell Lane and Orchard Drive, How Wood) to the housing sites allocated in the draft SSNP. This site was rated as Amber in the AECOM site assessment, but the assessment considered that given the site's location on the edge of a current settlement (How Wood), there was a reasonable prospect that housing will be developed on the site. The assessment concluded that Tippetdell Lane could form a robust, long term Green Belt boundary which would separate the site from the open countryside to the north east and landscaping/screening could be introduced to mitigate any visual impact of development. Although the site is larger than the NP level threshold of 30 dwellings, it has been considered in the past for 'enabling' housing to fund re-provision of the Baptist Church and provide a new community hall. Furthermore, there was strong community support for including this site in the draft SSNP.

The higher growth alternative necessitates allocating (for housing) more of the sites considered through the AECOM sites assessment. Some of these were previously rated Red based on Policy DLP12 in the 2016 version of the SACDLP and the advice from SACDC planning team that they considered

Neighbourhood level development to be around 30 dwellings per site. The current draft of SACDLP (2018) no longer includes Policy DLP12. Therefore, for the purposes of assessing the reasonable alternative of allocating a higher level of housing development it is necessary to revisit the list of sites assessed and include those sites that the SHLAA assessed as being suitable for further consideration for housing development but then ruled out (Red rating) on the basis that they could accommodate substantially more than DLP12 threshold of 30 dwellings. Sites currently assigned to employment are excluded as the SSNP seeks to retain employment sites.

SACDC commissioned a Green Belt study in 2014¹⁰ to provide an assessment of eight strategic sub-areas within the green belt in the District. These areas were assessed as contributing least towards the five Green Belt purposes, a parcel of land (GB25) was identified in the study as contributing least to Green Belt purposes. The study informed future development decisions by the Council and identified potential sites within the strategic sub-areas for potential release from the Green Belt for future development. Of the remaining sites assessed (Table 4.2); S26,S27,S28,S55 and S56 are all within strategic green belt parcel GB25. This area is currently allocated at strategic level within the SACDLP, Policy S6x (West of Chiswell Green Broad Location). Therefore, these are considered strategic sites and not suitable for NP level development allocation. This leaves the sites listed in Table 4.1; representing potential additional sites to be allocated in order to achieve the higher growth alternative.

Table 4-1 List of additional sites considered for the high growth alternative

Site name	Reference	Dwellings	RAG	Main reasons for rating
Land west of The Croft and Cherry Hill, Chiswell Green	S33	60		Encroachment into open country side – visually intrusive (site is elevated) Impact on infrastructure & Capacity above 30 dwellings
Harper Lodge Farm, Harper La., Radlett	S36	30		Poor access to public transport Poor road access Leads to loss of employment site in Green Belt
34-47 Radlett Rd Frogmore (Toyota showroom)	S49	25		Employment site in Green Belt
Garden off Lye Lane, Bricket Wood (west side of Lye Lane)	L14	18-24		No Within established housing area (opposite row of mobile homes) in Green Belt Very close to M25 (limited potential for a buffer)
Winslow Stables, Winslow House, 200 Radlett Rd, Colney Street.	L20	11-15		Remote from local services in Green Belt Part of site is designated Deciduous Woodland (priority habitat inventory)
Land to the north and south of Smug Oak La and land to north and west of Bricket Wood Management Training Centre	L21-L25	596		Part of L21-L25 collection of sites ; individual parcels promoted as 1 site (by same owner). All in Green Belt Remote from services/facilities Farmland in equestrian use-agricultural land Outside settlement boundary Inadequate access proximity to M25 Potential Coalescence issues. The sites vary in capacity from 33 to 260 dwellings.

¹⁰ SKM report 2014; St. Albans Green Belt Review Sites & Boundaries Study
https://www.stalbans.gov.uk/sites/default/files/documents/publications/planning-building-control/planning-policy/examination-library/SP_EB_GBR_Part2_SitesBoundaryStudy_Feb2014_tcm15-40720.pdf

Table 4.3 below sets out the housing numbers and sites required for each of the two alternatives considered;

Table 4-3 Summary of Alternatives

Alternative	Rationale	Growth	Sites involved
1. Proposed plan approach	Reflects community consultation and outcomes of technical evidence. Focuses on non-strategic sites, with a presumption that the new Local Plan will deliver strategic growth.	378 dwellings in total (+ retirement village) <ul style="list-style-type: none"> • Completions - 238 • Preferred sites - 140 new homes • 200 unit C2-Use retirement village (Site S19) 	S1 S21 S34 S43 L3
2. Additional 'non-strategic' site allocations (High growth)	In light of uncertainties related to the emerging Local Plan, this approach seeks to deliver a greater proportion of housing needs through the NP.	up to 619 dwellings in total (+retirement village) <ul style="list-style-type: none"> • Completions - 238 • Preferred sites - 140 new homes • 200 unit C2-Use retirement village (S19) • Additional non-strategic-750 	S1,S21,S34,S43,L3 S33, S36, S49, L14, L20, L21-L25.

Table 4.2 Summary of site appraisal findings

Site Ref.	Location	Site type (Greenbelt/Greenfield/Brownfield)	Site Source	Site Area (Ha)	Capacity (no. dwellings) ¹¹	SHLAA Conclusion	Neighbourhood Plan Site Assessment summary
S1	Land to rear of Nos.45 to 75 Bucknalls Drive, Bricket Wood	Green Belt	SHLAA 2009 and 2016 Update	1.51	25	<p>This site can be given further consideration for housing development. Although there would be some visual impact from development and a reduction in the site's openness, these are not considered major constraints to development (indeed the site is already partly developed). The key consideration for any residential development on this site would be protection of nature conservation interests (i.e. within the County Wildlife Site and the adjoining SSSI).</p> <p>Some concern over the site's poor accessibility to services/facilities/community infrastructure.</p> <p>Site put forward by an agent on behalf of the owner.</p> <p>After due consideration through the LDF process, given the site's location in the Green Belt, on the edge of the specified settlement of Bricket Wood, there is a reasonable prospect that housing will be developed on the site.</p>	<p>This site has been assessed as suitable and available for development in the 2016 SHLAA.</p> <p>It would therefore be an appropriate site for the NP to put forward as a proposal for housing, under Policy DLP 12 of the Draft Strategic Local Plan 2011-2031.</p> <p>If this site is selected for proposed allocation by the Neighbourhood Plan, and accepted by St Albans DC, the neighbourhood plan proposal would be implemented through a Green Belt boundary change in a future review of the Local Plan.</p>

¹¹ Development capacity figure for SHLAA sites (with the S prefix) taken from SHLAA. Capacity figures for sites with the L prefix taken either from the landowners estimate or an estimate of between 30 and 45 dwellings per hectare.

S7	Land at Five Acres Country Club, Bricket Wood	Green Belt	SHLAA 2009 and 2016 Update	2.73	6	<p>Site should be given further consideration for housing development. Permanent and temporary structures have been introduced over the years, which have changed the overall sense of rurality in this location. Furthermore, residential development in Bricket Wood now stretches right up to the site's south western boundary, so that it is no longer separate from the existing settlement. Approx. 80% of the site is TPO woodland and its retention would provide effective visual and noise screening for some limited development on the site.</p> <p>There have been numerous previous housing applications and further correspondence from the owner indicating high ongoing interest in residential development.</p> <p>After due consideration through the LDF process, given the site's location in the Green Belt, on the edge of the specified settlement of Bricket Wood, there a reasonable prospect that housing will be developed on the site. Part of the site is considered as previously developed land.</p>	<p>This site has been assessed as suitable and available for a limited amount of development in the 2016 SHLAA.</p> <p>Any development would need to be limited to the part of the site without Tree Preservation Orders (20%)</p> <p>It would therefore be an appropriate site (adjusted to remove the area covered by Tree Preservation Orders) for the NP to put forward as a proposal for housing, under Policy DLP 12 of the Draft Strategic Local Plan 2011-2031.</p> <p>If this site is selected for proposed allocation by the Neighbourhood Plan, and accepted by St Albans DC, the neighbourhood plan proposal would be implemented through a Green Belt boundary change in a future review of the Local Plan.</p>	
S19	Burston Garden Centre, Hertfordshire Fisheries, Burston Nurseries, North Orbital Road, How Wood	PDL/GF	St Albans SHLAA 2016	15.5	70	<p>Development of the entire site would be visually intrusive and result in encroachment into the surrounding countryside, which is rural in nature.</p> <p>It would contribute towards significant coalescence between Bricket Wood and Chiswell Green (and to a lesser extent,</p>	<p>It could become achievable either after due consideration through the LDF process, given that the site is considered as in some parts previously developed land the site's location in the Green Belt, on the edge of the specified settlement of How Wood, or possibly from an ad hoc application, based upon some limited</p>	

						<p>between Bricket Wood and How Wood). It would also be of a scale to significantly change the size and character of How Wood and would constitute unrestricted sprawl, in what is currently a vulnerable gap between existing settlements.</p> <p>Notwithstanding the above, the site partially comprises previously developed land, with existing buildings/development associated with Burston garden centre/nursery, Hertfordshire Fisheries etc. In light of the site's PDL status, there may be limited potential for replacing some of the existing uses in the northern part of the site with residential development (providing that there were environmental benefits to be achieved through removal of the majority of the large glass structures on the site and introducing new landscaping and public access to the resultant green space, as part of the Watling Chase Community Forest).</p> <p>Proposed by landowner via agent.</p>	<p>potential for replacing all or most of the existing uses in the northern part of the site with residential development.</p> <p>Limited residential development broadly along the lines envisaged above and below is believed to be supported by the landowner, as well as the original proposal for complete redevelopment of the entire site.</p> <p>This site has been assessed as potentially suitable and available for development in the 2016 SHLAA.</p> <p>However Policy DLP 12 of the Draft Strategic Local Plan 2011 -2031 (Neighbourhood Level Housing Development in the Green Belt) states that the maximum number of houses to come forward through a neighbourhood planning site allocation would be 30. This site is over this threshold and therefore would not be supported by SADC.</p>	
S21	Park Street Baptist Church/ land between Tippendell Lane and Orchard Drive, How Wood	Green Belt	SHLAA 2009 and 2016 Update	2.3	55	<p>Site should be given further consideration for housing development. Park Street Baptist Church occupies the south eastern corner of the site, whilst the remainder is green space.</p> <p>Development would have some impact on the site's openness and contribute marginally to coalescence between How Wood and Park Street (particularly at the</p>	<p>This site has been assessed as potentially suitable and available for development in the 2016 SHLAA. Policy DLP 12 of the Draft Strategic Local Plan 2011-2031 (Neighbourhood Level Housing Development in the Green Belt) states that the maximum number of houses to come forward through a neighbourhood planning site</p>	

						<p>north eastern corner of the site). However, Tippendell Lane could form a robust, long term Green Belt boundary which would separate the site from the open countryside to the north east and landscaping/screening could be introduced to mitigate any visual impact of development.</p> <p>The site has been considered in the past for 'enabling' housing to fund reprovision of the Baptist Church and provide a new community hall.</p> <p>Site put forward by an agent on behalf of the owner.</p> <p>After due consideration through the LDF process, given the site's location in the Green Belt, on the edge of the specified settlement of How Wood, there is a reasonable prospect that housing will be developed on the site.</p>	<p>allocation would normally be 30 (although there is some flexibility, providing the site can be considered to be 'neighbourhood level' housing. This site is considered to be above the threshold.</p> <p>However as it has the potential to provide community benefits and is supported by the community it is recommended that the site is discussed with SADC to better understand the flexibility within this policy in terms of size of site.</p>	
S26	Chiswell Green Farm (Parcel A) Chiswell Green Lane	Green Belt	SHLAA 2009 and 2016 Update	2.54	80	<p>This site forms part of the Strategic Sub-Area (SA-S8 - Enclosed land at Chiswell Green Lane at Chiswell Green), taken from SKM's Green Belt Review Purposes Assessment (2013) (Council appointed consultants).</p> <p>SA-S8 is an area within an overall strategic land parcel GB25. SKM Green Belt Review report states,</p> <p>"The overall contribution of GB25 towards Green Belt purposes is:</p> <ul style="list-style-type: none"> • To check the unrestricted sprawl of large built-up areas – limited or no 	<p>This site has been assessed as potentially suitable and available for development in the 2016 SHLAA.</p> <p>However Policy DLP 12 of the Draft Strategic Local Plan 2011 -2031 (Neighbourhood Level Housing Development in the Green Belt) states that the maximum number of houses to come forward through a neighbourhood planning site allocation would be 30. This site is over this threshold and therefore would not be supported by SADC.</p>	

					<ul style="list-style-type: none"> • To prevent neighbouring towns from merging – partial • To assist in safeguarding the countryside from encroachment – significant • To preserve the setting and special character of historic towns – partial • To maintain existing settlement pattern – significant <p>The enclosed land at Chiswell Green Lane at Chiswell Green is recommended for further assessment as a strategic sub-area (SA-S8). In light of the function of the strategic parcel, the sub-area identified on pasture land at Chiswell Green Lane displays urban fringe characteristics due to its proximity to the settlement edge and Butterfly World along Miriam Road to the west.</p> <p>This development bounds the outer extent of the pasture land and creates a physical barrier to the open countryside. The pasture land also displays greater levels of landscape enclosure due to localised planting along field boundaries. This creates potential to integrate development into the landscape with lower impact on views from the wider countryside and surroundings.</p> <p>At the strategic level, a reduction in the size of the parcel would not significantly compromise the overall role of the Green Belt or compromise the separation of settlements. Assessed in isolation the land makes a limited or no contribution towards all Green Belt purposes.”</p>		
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S27	Chiswell Green Farm (Parcel B) Chiswell Green Lane	Green Belt	SHLAA 2009 and 2016 Update	5.31	185	<p>This site forms part of the Strategic Sub-Area (SA-S8 - Enclosed land at Chiswell Green Lane at Chiswell Green), taken from SKM's Green Belt Review Purposes Assessment (2013) (Council appointed consultants). SA-S8 is an area within an overall strategic land parcel GB25. SKM Green Belt Review report states, "The overall contribution of GB25 towards Green Belt purposes is:</p> <ul style="list-style-type: none"> • To check the unrestricted sprawl of large built-up areas – limited or no • To prevent neighbouring towns from merging – partial • To assist in safeguarding the countryside from encroachment – significant • To preserve the setting and special character of historic towns – partial • To maintain existing settlement pattern – significant <p>The enclosed land at Chiswell Green Lane at Chiswell Green is recommended for further assessment as a strategic sub-area (SA-S8). In light of the function of the strategic parcel, the sub-area identified on pasture land at Chiswell Green Lane displays urban fringe characteristics due to its proximity to the settlement edge and Butterfly World along Miriam Road to the west.</p> <p>This development bounds the outer extent of the pasture land and creates a physical barrier to the open countryside. The</p>	<p>This site has been assessed as potentially suitable and available for development in the 2016 SHLAA.</p> <p>However Policy DLP 12 of the Draft Strategic Local Plan 2011 -2031 (Neighbourhood Level Housing Development in the Green Belt) states that the maximum number of houses to come forward through a neighbourhood planning site allocation would be 30. This site is over this threshold and therefore would not be supported by SADC.</p>
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						<p>pasture land also displays greater levels of landscape enclosure due to localised planting along field boundaries. This creates potential to integrate development into the landscape with lower impact on views from the wider countryside and surroundings.</p> <p>At the strategic level, a reduction in the size of the parcel would not significantly compromise the overall role of the Green Belt or compromise the separation of settlements. Assessed in isolation the land makes a limited or no contribution towards all Green Belt purposes."</p>		
S28	Adjoining Long Fallow/Forge End, Chiswell Green	Green Belt	SHLAA 2009 and 2016 Update	6.13	200	<p>Chiswell Green Lane at Chiswell Green), taken from SKM's Green Belt Review Purposes Assessment (2013) (Council appointed consultants). SA-S8 is an area within an overall strategic land parcel GB25.</p> <p>SKM Green Belt Review report states the overall contribution of GB25 towards Green Belt purposes is:</p> <ul style="list-style-type: none"> • To check the unrestricted sprawl of large built-up areas – limited or no • To prevent neighbouring towns from merging – partial • To assist in safeguarding the countryside from encroachment – significant • To preserve the setting and special character of historic towns – partial • To maintain existing settlement pattern – significant 	<p>This site has been assessed as potentially suitable and available for development in the 2016 SHLAA.</p> <p>However Policy DLP 12 of the Draft Strategic Local Plan 2011 -2031 (Neighbourhood Level Housing Development in the Green Belt) states that the maximum number of houses to come forward through a neighbourhood planning site allocation would be 30. This site is well over this threshold and therefore would not be supported by SADC.</p>	

						<p>The enclosed land at Chiswell Green Lane at Chiswell Green is recommended for further assessment as a strategic sub-area (SA-S8). In light of the function of the strategic parcel, the sub-area identified on pasture land at Chiswell Green Lane displays urban fringe characteristics due to its proximity to the settlement edge and Butterfly World along Miriam Road to the west.</p> <p>This development bounds the outer extent of the pasture land and creates a physical barrier to the open countryside. The pasture land also displays greater levels of landscape enclosure due to localised planting along field boundaries. This creates potential to integrate development into the landscape with lower impact on views from the wider countryside and surroundings.</p> <p>At the strategic level, a reduction in the size of the parcel would not significantly compromise the overall role of the Green Belt or compromise the separation of settlements. Assessed in isolation the land makes a limited or no contribution towards all Green Belt purposes."</p> <p>In view of the above circumstances, this site would be further assessed for potential housing development.</p>		
S33	Land west of The Croft and Cherry Hill, Chiswell Green	Green Belt	SHLAA 2009 and 2016 Update	2.1	60	<p>Site should be given further consideration for housing. The site is in a prominent position on high ground, with neighbouring open fields with long views to the west. Development would result in encroachment into open countryside and</p>	<p>This site has been assessed as potentially suitable and available for development in the 2016 SHLAA.</p>	

						<p>would be visually intrusive from the surrounding countryside.</p> <p>However, it could be argued that the site (and adjoining Sites 43a, 43b, 40 and 44) would be suitable for residential development in principle and that any new housing could be suitably screened from the surrounding countryside.</p> <p>Any development potential needs to be considered in the context of the new link road to the Butterfly World site and the expansion of the Thistle Hotel.</p> <p>Site put forward by an agent on behalf of the owner.</p> <p>After due consideration through the LDF process, given the site's location in the Green Belt, on the edge of the specified settlement of Chiswell Green, there is a reasonable prospect that housing will be developed on the site. Any development potential needs to be considered in the context of the cumulative impacts on infrastructure in the area, in the light of current developments in the immediate area.</p>	<p>However Policy DLP 12 of the Draft Strategic Local Plan 2011 -2031 (Neighbourhood Level Housing Development in the Green Belt) states that the maximum number of houses to come forward through a neighbourhood planning site allocation would be 30. This site is over this threshold and therefore would not be supported by SADC.</p>	
S34	Land at Orchard Drive, How Wood	Green Belt	SHLAA 2009 and 2016 Update	1.34	30	<p>Site should be given further consideration for housing.</p> <p>The existing tree-lined A405 North Orbital Road lying immediately to the west is a significant feature separating the two settlements of How Wood and Chiswell Green physically, visually and in terms of</p>	<p>This site has been assessed as potentially suitable and available for development in the 2016 SHLAA.</p> <p>It would therefore be an appropriate site for the NP to put forward as a proposal for housing, under Policy</p>	

						<p>their identity and function. Whilst this site is still primarily green space, it serves no real Green Belt purpose and is suitable in principle for housing, given that it is already surrounded on three sides by existing residential development.</p> <p>Existing natural screening protects residential properties from the adverse impacts of the North Orbital Road and should be retained and enhanced as a natural buffer. The north western corner of the site is also covered by TPO woodland. Furthermore, a single detached dwelling ('Meadowside') occupies approx 0.1 ha in the centre of the site, whilst a recreation ground/ equipped play area is situated in the southern corner of the site. These constraints would reduce any net developable area.</p> <p>Site put forward by an agent on behalf of the owner.</p> <p>After due consideration through the LDF process, as a large site of previously developed land in the Green Belt, on the edge of the specified settlement of How Wood, there is a reasonable prospect that housing will be developed on the site.</p>	<p>DLP 12 of the Draft Strategic Local Plan 2011-2031.</p> <p>If this site is selected for proposed allocation by the Neighbourhood Plan, and accepted by St Albans DC, the neighbourhood plan proposal would be implemented through a Green Belt boundary change in a future review of the Local Plan.</p>	
S36	Harper Lodge Farm, Harper Lane, Radlett, WD7 7 HH	Green Belt	SHLAA 2009 and 2016 Update	4.2	30	<p>Site should be given further consideration for housing. This is an unallocated employment site in an isolated location, lying to the east of the main railway line and south of Harper Lane. Accessibility is relatively poor, with poor public transport</p>	<p>This site has been assessed as potentially suitable and available for development in the 2016 SHLAA.</p> <p>However, there are a number of issues including poor public transport</p>	

						<p>linkages and narrow road access from the Harper Lane/ Watling Street bridge over the railway.</p> <p>The site comprises an operational waste transfer facility, open storage, development industrial, warehousing, stables and contractors' yards. It lies on the edge of Area NS6 – Notifiable Sites (Hazardous Installations).</p> <p>Residential development would result in the loss of an approved waste transfer station and would therefore prejudice the use of that land for those purposes, unless a suitable alternative provision was proposed.</p> <p>Development of the entire site would increase coalescence towards Radlett, but there would be little visual intrusion as the site is already well screened by vegetation.</p> <p>Shortlisting will be subject to Council decisions regarding the need to retain certain employment areas across the District in employment use. (This unallocated site is classified as an 'average' site for employment uses in the Central Hertfordshire Employment Land Review).</p> <p>Site put forward by an agent on behalf of the owner.</p>	<p>linkages, narrow road access and proximity to a hazardous installation which would need to be resolved.</p> <p>The site is also an active employment site and development of the site would have to be balanced against loss of an employment use (a decision which would need to be made by SADC)</p> <p>It would therefore be an appropriate site for the NP to put forward as a proposal for housing, under Policy DLP 12 of the Draft Strategic Local Plan 2011-2031.</p> <p>If this site is selected for proposed allocation by the Neighbourhood Plan, and accepted by St Albans DC, the neighbourhood plan proposal would be implemented through a Green Belt boundary change in a future review of the Local Plan.</p>	
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						After due consideration through the LDF process, as a large site of previously developed land in the Green Belt, there a reasonable prospect that housing will be developed on the site.		
S43	Land south of How Wood adjacent to Park Street Lane, railway line and M25	Green Belt	SHLAA 2009 and 2016 Update	2.3	30	<p>Site should be given further consideration for housing. Development on all of this site would significantly contribute to visual and (to a lesser extent) physical coalescence of How Wood and Bricket Wood. Development would also result in encroachment into open countryside and would affect land that is rural rather than urban in nature. The southern part of the site is also in close proximity to the M25 and suffers from air and noise pollution.</p> <p>However, the northern half of the site is bounded by existing residential development to the north and west and its development would not have the same impact as described above.</p> <p>Site put forward by an agent on behalf of the owner in the past and is believed to still have an active interest in pursuing development on this site.</p> <p>After due consideration through the LDF process, as a large site of previously developed land in the Green Belt, on the edge of the specified settlement of How Wood.</p>	<p>This site has been assessed as potentially suitable and available for development in the 2016 SHLAA.</p> <p>It would therefore be an appropriate site for the NP to put forward as a proposal for housing, under Policy DLP 12 of the Draft Strategic Local Plan 2011-2031.</p> <p>If this site is selected for proposed allocation by the Neighbourhood Plan, and accepted by St Albans DC, the neighbourhood plan proposal would be implemented through a Green Belt boundary change in a future review of the Local Plan.</p>	

						Opportunities for a carbon-offset scheme through tree planting may be possible.		
S49	37-47 Radlett Road, Frogmore (Toyota Showroom)	Green Belt Settlement Envelope	SHLAA 2009 and 2016 Update	0.71	25	<p>Site should be given further consideration for housing. Site comprises car showroom and associated car parking. No known constraints. Residential acceptable in principle. (Larger site than previously accepted in principle).</p> <p>Site proposed by landowner via solicitor. After due consideration through the LDF process, as a large site of previously developed land in the Green Belt, in the settlement of Radlett Road/Frogmore.</p>	<p>Although currently an employment site, this site has been assessed as potentially suitable and available for development in the 2016 SHLAA.</p> <p>It also falls within a Green Belt Settlement Envelope (Policy DLP1) under which means it could be allocated in the Neighbourhood Plan for development of up to 10 units.</p> <p>However it could be put forward as a proposal for development under Policy DLP 12 of the Draft Strategic Local Plan 2011-2031.</p> <p>If this site is selected for proposed allocation by the Neighbourhood Plan, and accepted by St Albans DC, the neighbourhood plan proposal would be implemented through a Green Belt boundary change in a future review of the Local Plan.</p>	
S55	Noke Side, Chiswell Green, St Albans	Green Belt	SHLAA 2009 and 2016 Update	1.06	25	<p>Site should be given further consideration for housing. This site forms part of the Strategic Sub-Area (SA-S8 - Enclosed land at Chiswell Green Lane at Chiswell Green), taken from SKM's Green Belt Review Purposes Assessment (2013) (Council appointed consultants).</p> <p>SA-S8 is an area within an overall strategic land parcel GB25.</p>	<p>This site has been assessed as potentially suitable and available for development in the 2016 SHLAA.</p> <p>Policy DLP 12 of the Draft Strategic Local Plan 2011-2031 (Neighbourhood Level Housing Development in the Green Belt) states that the maximum number of houses to come forward through a</p>	

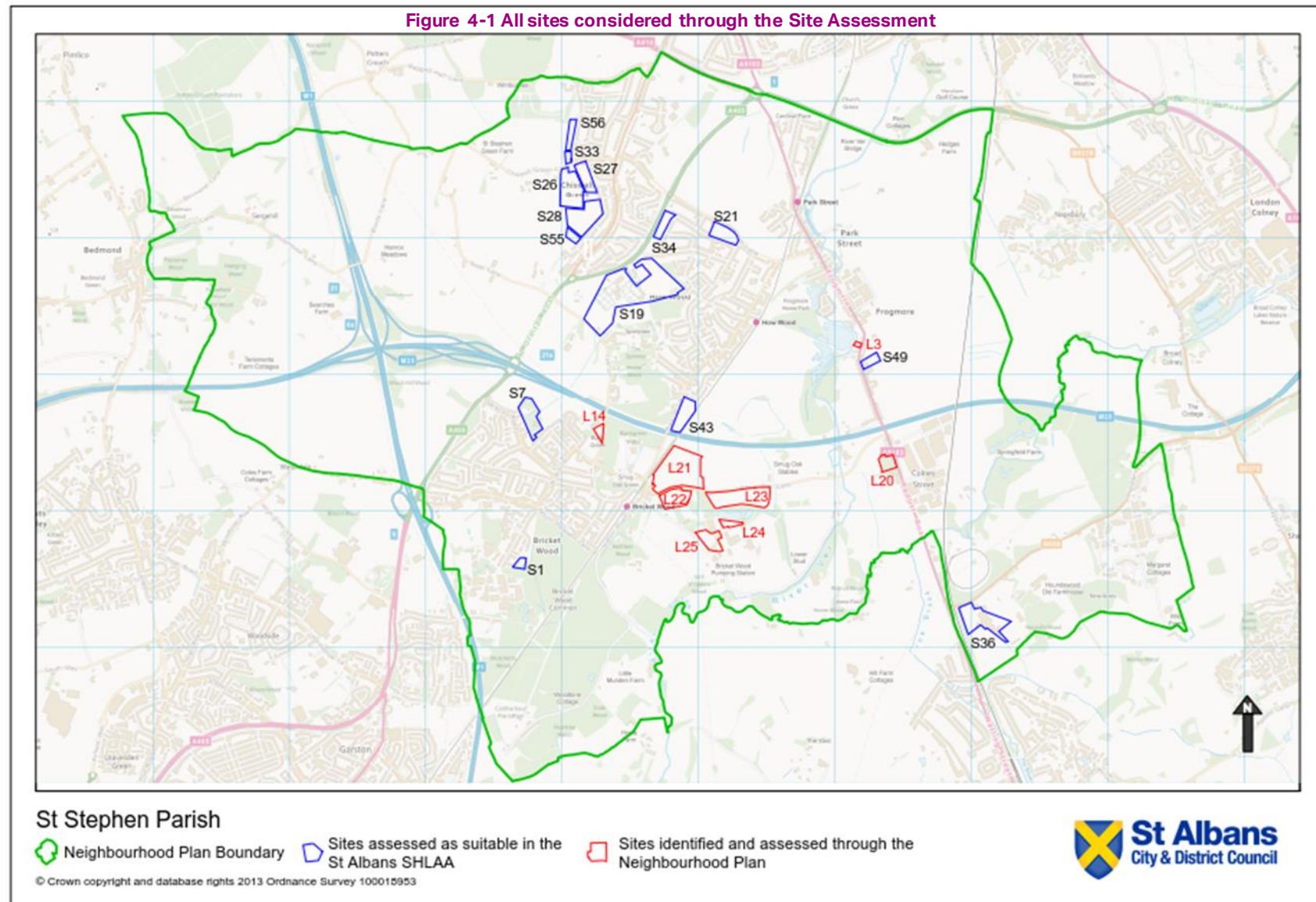
						<p>SKM Green Belt Review report states, “The overall contribution of GB25 towards Green Belt purposes is :</p> <ul style="list-style-type: none"> • To check the unrestricted sprawl of large built-up areas – limited or no • To prevent neighbouring towns from merging – partial • To assist in safeguarding the countryside from encroachment - significant • To preserve the setting and special character of historic towns – partial • To maintain existing settlement pattern - significant <p>The enclosed land at Chiswell Green Lane at Chiswell Green is recommended for further assessment as a strategic sub-area (SA-S8). In light of the function of the strategic parcel, the sub-area identified on pasture land at Chiswell Green Lane displays urban fringe characteristics due to its proximity to the settlement edge and Butterfly World along Miriam Road to the west.</p> <p>This development bounds the outer extent of the pasture land and creates a physical barrier to the open countryside. The pasture land also displays greater levels of landscape enclosure due to localised planting along field boundaries. This creates potential to integrate development into the landscape with lower impact on</p>	<p>neighbourhood planning site allocation would normally be 30 dwellings. However this is a draft policy and there is likely to be flexibility to allow sites of over 30 dwellings provided they can be considered ‘neighbourhood level’ development.</p> <p>This site is therefore within the likely threshold, however as it is within an overall strategic land parcel it would not be appropriate to allocate this site alone in the Neighbourhood Plan and it is therefore advised not considered to be appropriate proposal for the Neighbourhood Plan.</p>	
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						views from the wider countryside and surroundings. At the strategic level, a reduction in the size of the parcel would not significantly compromise the overall role of the Green Belt or compromise the separation of settlements. Assessed in isolation the land makes a limited or no contribution towards all Green Belt purposes."	
S56	Land at Cherry Hill Chiswell Green, St Albans	Green Belt	SHLAA 2009 and 2016 Update	1.3	This site would be further assessed for potential housing development. Part site only. 52 (at 40dph)	Site should be given further consideration for housing. Chiswell Green Lane at Chiswell Green), taken from SKM's Green Belt Review Purposes Assessment (2013) (Council appointed consultants). SA-S8 is an area within an overall strategic land parcel GB25. SKM Green Belt Review Report states the overall contribution of GB25 towards Green Belt purposes is: " • To check the unrestricted sprawl of large built-up areas – limited or no • To prevent neighbouring towns from merging – partial • To assist in safeguarding the countryside from encroachment – significant • To preserve the setting and special character of historic towns – partial • To maintain existing settlement pattern – significant	This site has been assessed as potentially suitable and available for development in the 2016 SHLAA. However, Policy DLP 12 of the Draft Strategic Local Plan 2011 -2031 (Neighbourhood Level Housing Development in the Green Belt) states that the maximum number of houses to come forward through a neighbourhood planning site allocation would be 30. This site is over this threshold and therefore would not be supported by SADC.

						This area may, subject to scale of development, offer opportunities to develop with limited impact on the Green Belt.		
L3	Land adjacent to No.2 Radlett Road, Frogmore; Land Between 2 & 16 Radlett Road Frogmore St Albans Hertfordshire	Green Belt	St Stephen Neighbourhood Plan Call for Sites, March 2017	0.15	1-3 proposed by Landowner	N/A	<p>Site is suitable and available for a small amount of residential development.</p> <p>The site is within the greenbelt and outside the Green Belt Settlement Envelope (emerging policy DLP 1 and adopted Policy 2 Settlement Strategy SS.5), and therefore not currently suitable for allocation in the Neighbourhood Plan.</p> <p>However, it can be identified as a site proposed for release from green belt in the NP under Local Plan Policy DLP12.</p> <p>The site shares a boundary with the River Ver, and the western edge of the site located within Flood Zone 3. Site is reasonably well located with respect to community facilities and services.</p>	
L14	Garden off Lye Lane, Bricket Wood; Land on the west side of Lye Lane Bricket Wood	Green Belt	St Stephen Neighbourhood Plan Call for Sites, March 2017	0.6	18 – 24	N/A	The site is not within an established area of housing and despite being opposite a row of static or mobile homes development here would not relate well to the surrounding area. It is very close to the M25 which would allow only a limited buffer between the road and residential use.	

							<p>The site is within the greenbelt and therefore not currently suitable for allocation in the Neighbourhood Plan (although could be promoted under Local Plan Policy DLP12).</p> <p>The southern tip of the site is designated as broadleaved Forest in the National Forest Inventory. This latter designation is however non-statutory.</p>	
L20	Winslo Stables Winslo House, 200 Radlett Road, Colney Street	Green Belt	St Stephen Neighbourhood Plan Call for Sites, March 2017	1.22	11-15 promoted by Landowner	N/A	<p>Site is potentially suitable for a small amount of residential development; however, it is remote from local facilities and services.</p> <p>The site is within the greenbelt and therefore not currently suitable for allocation in the Neighbourhood Plan.</p> <p>However, it can be identified as a site proposed for release from green belt in the NP under Local Plan Policy DLP12. Removal of the site from the green belt would not harm the purposes of the green belt.</p> <p>The western half of the site is designated as Priority Habitat Inventory - Deciduous Woodland, and broadleaved Forest in the National Forest Inventory. This designation is however non-statutory, but may reduce the developable area of the site.</p>	

L21	Land north of Smug Oak Lane	Green Belt	Submitted by Agent to St. Stephen Parish Council	8.86	260	N/A	<p>These sites, in individual parcels, are being promoted as one site by the same landowner, and as such they would exceed the size of site that could be considered to be 'neighbourhood level' development and therefore appropriate for proposing for development under Local Plan policy DLP 12.</p> <p>The sites have been assessed individually in detail.</p>
L22	Land to the South of Smug Oak Lane and to the northwest of Bricket Wood Management Training Centre	Green Belt	Submitted by Agent to St. Stephen Parish Council	2.5	75		
L23	Land to the South of Smug Oak Lane and to the north of Bricket Wood Management Training Centre	Green Belt	Submitted by Agent to St. Stephen Parish Council	5.8	174		
L24	Land to the north of Bricket Wood Management Training Centre	Green Belt	Submitted by Agent to St. Stephen Parish Council	1.1	33		
L25	Land to the west of Bricket Wood Management Training Centre	Green Belt	Submitted by Agent to St. Stephen Parish Council	1.8	54		



Outline reasons for selecting the preferred site option

The decision relating to the allocation of preferred sites is based primarily on the outputs from the site assessment exercise. This demonstrates that the preferred sites perform well overall compared to the discounted site options (when considered across the full range of criteria).

There are no significant constraints associated with Sites S1, S21, S34, S43 and L3. In common with other sites considered these are currently within the Green Belt, however, they lie on the edges of existing settlements and therefore would be more sustainable from the point of view of access to existing infrastructure and services within the villages of St Stephen. Site S7 which also scored well in the assessment was withdrawn by the owners and therefore not included in the preferred sites here.

Sites L21-25 (promoted forward as one site by landowner) and L20 were discounted on the basis of being somewhat remote from existing settlements and services and site L14 due to its proximity to the M25 and not being in a residential area.

Sites in areas identified as strategic Green Belt parcels were discounted on the basis that they are in remote locations (from current settlements and services). Furthermore, these are being considered for strategic level developments by SACDC.

Several constraints have been identified pertaining to Site S19. The site contains agricultural buildings (glass houses and polytunnels) as well as an operating Garden Centre. The sites assessment concluded that development here would be visually intrusive in an otherwise rural setting. There is also a heritage asset; Burston Manor, a manor house and associated buildings (Grade II* and Grade II listed). A recent appeal¹² associated with a proposal to demolish existing horticultural structures and redevelop the site was dismissed by the inspector. The inspector cited adverse impacts on the openness of the green belt, the character and appearance of the landscape and the setting of the heritage asset as prime reasons for dismissing the appeal.

Table 4.3 below sets out the site reference for the options. More detailed rationale can be found in the separate site assessment report.

Table 4.3: Reference for site selection.

Preferred Site Options	Site Reference*
Site 1. Land to rear of Nos.45 to 75 Bucknalls Drive, Bricket Wood	S1
Site 2. Park Street Baptist Church/ land between Tippendell Lane and Orchard Drive, How Wood	S21
Site 3. Land at Orchard Drive, How Wood	S34
Site 4. Land south of How Wood adjacent to Park Street Lane, railway line and M25	S43
Site 5. Land adjacent to No.2 Radlett Road, Frogmore; Land Between 2 & 16 Radlett Road Frogmore St Albans Hertfordshire	L3

*From Site Assessment report

¹² Appeal Ref APP/B1930/W/19/3235642

5. What are the appraisal findings at this current stage?

5.1 Introduction

The aim of this chapter is to present appraisal findings and recommendations in relation to the Regulation 14 version of the SSNP.

5.2 Current approach in the Neighbourhood Plan and the development of Neighbourhood Plan policies

Neighbourhood Plan Policies – St Stephen Neighbourhood Plan

Housing and the built environment policies

S1	Spatial strategy
S2	Housing strategy
S3	Dwelling mix
S4	Design of development
S19	Retirement care home facilities
S20	Burston Garden Centre
S25	Land at Orchard Drive, Park Street
S26	Land at Park Street Baptist church between Tippendell Lane and Orchard Drive, Park Street
S27	Land South of Park Street Lane, Park Street
S28	Land to rear of 45 to 75 Bucknalls Drive
S29	Land at Frogmore, Park Street, off the A5183

Natural and historic environment policies

S5	Minimising the environmental impact of development
S6	Protection of natural habitats
S7	Protection and maintenance of local green spaces
S8	Protecting the setting and function of the River Ver the River Colne and their tributaries
S9	Green infrastructure and development

Community facilities policies

S15	Community facilities
S16	Provision of leisure facilities for children and teenagers
S17	Protection of public houses
S18	Allotments and community growing spaces

Transport

S10	Improvements to key local junctions and pinch points
S11	Off-street car parking
S12	Bus services and community transport
S13	Provision for walking and cycling
S14	Improving the bridleway network

Employment

S21	Supporting the expansion of businesses
S22	Village retail areas
S23	Protection of existing employment premises or land
S24	High speed broadband

5.3 Approach to the appraisal

The appraisal is structured under each of the SEA Objectives that are set out in the SEA Framework.

For each Objective, 'significant effects' of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations.¹³ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.

The higher growth alternative is also appraised in a text box under each section below. This is based on the constraints identified at the site assessment stage and their likely effects on the SA topics below. The site specific issues are also addressed in combination to ensure that the cumulative effects of a higher growth option are identified.

Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

5.4 SEA Objective 1 Biodiversity

Protect, maintain and enhance biodiversity habitats and species; achieving a net environmental gain and stronger ecological networks.

Appraisal findings: Site Allocation

The draft SSNP allocates five sites for residential development and one site for a C2-use retirement village, around the existing settlements in the Parish. The existing settlement areas are surrounded by green belt and the sites assessed as being most suitable for housing all fall within the green belt. Therefore, the Plan proposes to make minor amendments to the current green belt boundary surrounding the main settlements, extending the existing settlements into the surrounding green belt. However, the scale of development proposed is modest compared to that planned at strategic level proposed in the SACDLP. The overall quantum of development comprises around 140 dwellings with the largest site allocated for up to 60 dwellings. There is also a 200 unit retirement village proposed at a site located near Burston Garden Centre, which is also in the green belt. Therefore, with the exception of the proposed retirement village, the individual sites are relatively small and being adjacent to existing settlements, are unlikely to disrupt biodiversity significantly. The site allocation at Land to rear of Nos. 45 to 75 Bucknalls Drive, Bricket Wood is adjacent to Bricket Wood Common SSSI. The latter comprises broad leaved, mixed and Yew woodland and although the site is already partly developed further development here may potentially adversely impact the site through noise, light and recreation disturbances as well as predation from domestic animals. At site S21 (Park Street Baptist Church/ land

¹³ *Environmental Assessment of Plans and Programmes Regulations 2004*

between Tippendell Lane and Orchard Drive, How Wood) there could potentially be some adverse impacts on biodiversity, as the site has remained as a green space for some time and is likely to have regenerated since the initial disturbance from the adjacent development and the road. It is recommended that an ecological study is carried out on the site to inform development decisions here. Overall therefore the sites allocated are predicted to have potentially **minor negative effects** on biodiversity.

Appraisal findings: Draft SSNP Policies

Housing and the built environment

Policies S1-S2 seek to extend the existing built up area boundaries within the Parish; at Bricket Wood, Chiswell Green and Park Street to accommodate a total of around 140 dwellings plus a 200 unit retirement village. Although this involves some encroachment onto the green belt, the sites being adjacent to existing settlements and being of modest scale are likely to have a **neutral effect** on biodiversity. Policy S4 supports high quality design; including the provision of green landscaping and space for front gardens will have a neutral to minor positive effect on biodiversity as gardens and urban green spaces can provide valuable contributions to biodiversity. However, the effects will depend largely upon the detailed design of developments and how 'green space' is interpreted. Small non-functional pieces of 'greenery' should be discouraged in favour of larger spaces and stepping stones that can actually perform a useful function for biodiversity.

Policies S19-S20 support a new retirement village development (up to 200 units) on a site currently containing horticultural buildings (behind Burston Garden Centre). Although the site is on previously developed land, it lies within the green belt; contributing to its openness. However, the majority of the site is occupied by horticultural buildings, glass houses and polytunnels, the boundaries comprise mature trees screening the site from the North Orbital road and the Burston Manor. The site is surrounded by woodland and the area within the site is classed as priority habitat for several species including Lapwing; a priority species for Countryside Stewardship (CS) targeting. Other birds found in this location include; the Turtle Dove, the Yellow Wagtail and the Red Shank. Therefore, a development of this scale here may have a **minor negative effect** on biodiversity due to potential habitat disruption and fragmentation.

Policies S25-S29 allocate sites for housing around existing settlements. Policy S27 allocates land for housing South of Park Street Lane (Park Street). This site is close to the Moor Mill Quarry SSSI, a buried and inaccessible site of geodiversity importance (Earth Heritage), comprising gravel, silts and chalky till which traces the diversion of the proto-Thames. Furthermore, there is a railway line separating Site S27 and the SSSI site, with the M25 abutting both sites to the south. In view of the fact that the Mill Quarry SSSI is self-contained and inaccessible; site S27 site is unlikely to significantly impact the SSSI with respect to biodiversity.

Policy S28 (Land to rear of Nos. 45 to 75 Bucknalls Drive, Bricket Wood) is adjacent to Bricket Wood Common SSSI. Although the site is already partly developed, further development here may potentially adversely impact the adjacent SSSI. The latter comprises broad leaved, mixed and Yew woodland and although the site is already partly developed further development here may potentially adversely impact the site through noise, light and recreation disturbances as well as predation from domestic animals. The site was assessed as suitable for a development of up to 25 dwellings in the 2016 SHLAA. The SSNP proposes a much more modest scale of development comprising around 14 low rise/ Bungalow type dwellings, with appropriate design and screening/ buffer zones between development and the SSSI it is expected this allocation could potentially have a **minor negative** effect on biodiversity, though with appropriate mitigation impacts can be minimised.

Overall therefore, this set of policies is anticipated to have mixed effects on biodiversity. In the main the Policies are predicted to have **neutral** effects on Biodiversity. However, Policies S19-S20 and S28 can potentially have **minor negative** effects on biodiversity.

Natural and historic environment

Policies S5 and S6 are likely to have a positive impact on biodiversity as they seek to protect the Watling Chase Community Forest, supporting the creation of trees and woodland. They also seek to; plant small to medium scale plantation of trees/ shrubs and maintain existing and plant new, hedgerows. Development proposals that are likely to harm local landscape features will not be supported, unless it can be demonstrated that they cannot be located elsewhere. In such case compensatory measures must be proposed and the effects offset. Similarly, Policies S7 and S9 seek to; protect designated local green space and enhance Green Infrastructure (GI).

Policy S8 seeks to protect and enhance the biodiversity associated with rivers Ver and Colne corridors.

Overall, this set of policies are anticipated to have a **minor positive effect** on biodiversity.

Community facilities

Policies S15-S17, are not expected to have significant effects on biodiversity. Policy S18 supports the maintenance of existing allotments and community growing places. Such areas can make a contribution to biodiversity, providing valuable habitats to flora and fauna within urban environments. Overall, this set of policies is expected to have **minor positive effect** on biodiversity.

Transport

Policies S12-S14 are anticipated to have some limited beneficial effects on biodiversity in the area as they seek to provide walking, cycling and enhanced bridleways networks. If delivered sensitively, these would help to avoid negative effects on biodiversity, whilst reducing the expansion the number of car trips. Delivered in a proactive way, such routes can also help provide pathways for biodiversity by connecting habitats and reducing fragmentation.

Policies S10-S11 are not anticipated effects relevant to biodiversity. Overall, this set of policies is anticipated to have a **minor positive effect** on biodiversity.

Employment

Policies S21-S23 seek to retain existing employment and village retail facilities in the NP area and supporting reasonable expansion of existing businesses. Policy S21 states that such expansions could take place in the green belt (if they prove appropriate or demonstrate very special circumstances). No specific reference is made to biodiversity in this group of policies. Therefore, these policies may lead to expansion of businesses and retail at the expense of biodiversity habitats in the area and therefore these can have **potentially minor negative effects** on biodiversity.

Overall (cumulative) effects

Overall, the plan is predicted to have mixed effects on biodiversity. The proposal to build a new retirement village (S19-S20) potentially has **minor negative effects** on biodiversity. The expansion of existing employment sites (S21-23) can have uncertain to **potentially minor negative effects** on biodiversity. The other policies, combined, are predicted to have **minor positive effects** on biodiversity as they seek to protect and enhance biodiversity.

Appraisal of the high growth alternative (49 dpa)

Collectively the additional sites included in high growth scenario (table 4.1) would deliver up to 750 potential dwellings. When added to the housing sites in the draft SSNP the total growth would comprise 890 dwellings and a 200 unit retirement village. The additional sites included under the alternative scenario are green field sites in the Green Belt. The majority of these sites are remote from existing services, community facilities and transport infrastructure. This also applies to the collection of sites (L21-L25) which also lead to substantial loss of agricultural land; development here would alter the currently rural nature of the sites to urban isolated estates. Therefore, the high growth alternative is predicted to produce **significant negative effects** on biodiversity. The substantial additional development proposed would engender significant pressures on biodiversity through the loss of and disruption of primarily rural habitats (recreational pressure, noise, light and domestic animals) and through fragmentation. This is predicted to results in a significantly larger negative effect in the long term when compared to Plan. It is important to point out that some of the positive effects of the plan policies (e.g. those protecting the Watling community forest and allotments) are also likely to be engendered by the high growth alternative.

5.5 SEA Objective 2: Climate change

Avoid and manage flood risk and support the resilience of the St Stephen Neighbourhood Plan area to the potential effects of climate change.

Appraisal findings: Draft SSNP Site Allocation

Housing and employment growth proposed through the SSNP will lead to increases in built up areas within St Stephen. This will stimulate additional traffic flows and lead to some inevitable increases in greenhouse gas emissions originating from the parish. However, given the scale of growth proposed, and the likelihood of improvements to energy efficiency and the adoption of new technologies, this is not considered to lead to significant effects in relation to climate change mitigation.

In addition, the site allocations proposed through the SSNP are located adjacent to existing settlement boundaries around the build-up areas of Bricket Wood, Chiswell Green and Park Street. Generally, these demonstrate good access to local services, facilities and employment in the villages. This should help limit increases in greenhouse gas emissions from transport.

The sites proposed for allocation have generally been determined as being at low risk for flooding. However, Policy 29 allocates a small site at Frogmore, Park Street, off the A5183 (Radlett Rd). The site, allocated for 5x2 bedroom homes, shares a boundary with the River Ver with the northern edge of the site located in a Flood Zone 3. However, the SSNP states no development will be located in the northern part of the site (Flood Zone 3) and requires the provision of SuDS on the site.

Therefore, the site allocations within the draft SSNP are predicted to have **neutral effects** in terms of climate change mitigation and resilience.

Appraisal findings: Draft SSNP Policies

Housing and the built environment

Policy S1 proposes that the Green Belt boundary be amended to exclude the six sites allocated for housing. This will effectively extend the boundary around the existing urban settlements into the green belt. Whilst the green belt can make a contribution to Climate change mitigation (e.g. by storing and absorbing CO₂), the scale of total development proposed is relatively modest, particularly when compared to strategic level growth proposed in the SACDLP (also within the green belt). Concentrating development in existing urban settlements, where there are existing services and facilities will have the effect of reducing resident's need to travel further afield for such services thus reducing vehicular emissions. The additional development to be created through implementing policy S2 is likely to create additional vehicular traffic and associated ghg emissions which in isolation would have an adverse impact on climate change. However, by allocating a modest scale of additional housing in locations close to existing services and infrastructure this policy produces a more sustainable growth pattern as it helps reduce journeys travelled by residents to access services and community facilities and lessens the need for new infrastructure.

Policy S4 seeks to incorporate sustainability consideration into the design of development with the aim of reducing energy consumption and improving energy efficiency. It also seeks to improve provision of pedestrian and cycle connections which help reduce reliance on car travel thus reducing ghg emissions. Furthermore, the policy seeks the provision and maintenance of green space. Green spaces can act as a carbon sinks thus helping to reduce CO₂. They also improved flood resilience by improving permeability to surface water, reducing runoff and helping to contain and attenuate flood waters. The policy also supports the conservation and recycling of water resources by encouraging Grey Water systems in dwellings. Policy S4 is therefore predicted to have a **minor positive effect** on climate change.

Policy S25-S29 require development to include SUDS which helps to reduce surface runoff thereby increasing resilience to flooding. They also seek high quality development that incorporates sustainable design which helps reduce resource consumption and improve energy efficiency thereby reducing ghg emissions.

Collectively, policies S1-S4, S19-S20 and S25-S29 are likely to have a **minor positive effect** on climate change mitigation and adaptation.

Natural and historic environment

Policies S5 and S6 are likely to have a **minor positive effect** on climate change as they seek to protect the Watling Chase Community Forest, supporting the creation of trees and woodland. They also seek to; plant small to medium scale plantation of trees/ shrubs and maintain existing and plant new, hedgerows. Development proposals that are likely to harm local landscape features will not be supported, unless it can be demonstrated that they cannot be located elsewhere. In such cases compensatory measures must be proposed and the effects offset. Policies S7 and S9 seek to; protect designated local green space and enhance Green Infrastructure (GI). Together, these policies ought to lead to some offsetting of carbon emissions and help to improve resilience to expected climate changes. The magnitude of impacts is small though, so the effects are not significant and only likely to arise in the longer term.

Community facilities

Policy S18 seeks the retention of allotments and community growing spaces. Community growing can provide a good source of healthy, locally sourced food and make this more readily available to local people. Community growing can help reverse soil degradation helping to conserve soils and reduce erosion. These areas can also CO₂ through carbon capture and improve flood resilience by improving permeability to surface water, reducing runoff and encouraging the re-use of rainwater.

Green spaces can act as a carbon sinks thus helping to reduce CO₂. They and attenuate flood waters. Overall this set of policies are predicted to have a **minor positive effect** on air climate change.

Transport

The SEA scoping exercise highlighted the issue of traffic congestion pinch points in the Parish. Policy S10 seeks improvements to key local junctions and pinch points. Development proposals must address (to the satisfaction of the Highway Authority) the cumulative transport impacts on road junctions and existing pinch point. As traffic congestion increases, so too do fuel consumption and CO₂ emissions. Therefore, congestion mitigation policies should reduce CO₂ emissions. By seeking to address existing and future potential congestion points, Policy S10 is likely to have **positive effects** on climate change.

Policy S11, which seeks to retain existing off-street parking is likely to have mixed effects on air quality. Loss of off-street parking is likely to exacerbate road congestion due to residents resorting to parking on the sides of roads and impeding traffic movement. On the other hand, off-street parking may encourage the use of private cars as a means of transport in preference to walking or public transport. Additionally, the land take for off-street parking is likely to be at the cost of open space and/ or green space. Furthermore, as drivers cruising for a parking space or leaving their car engines idling when waiting for a space will also lead to increases CO₂ emissions. Having said that, the policy does not seek a substantial increase in off-street parking, rather, it aims to retain existing off-street parking and supports additional parking to accommodate demand generated by new developments. On balance PS11 is likely to have **neutral effects** on climate change.

Policies S12 to S14 are anticipated to have **positive effects** on climate change by seeking to improve bus transport and encouraging active travel by walking and cycling and improvement to the bridleway network.

Taken together as a group; this set of policies is anticipated to have **minor positive effects** on climate change.

Employment

Policies E1 – E6 are anticipated to have a **minor positive effect** on climate change as they seek to retain existing employment and retail (within village centres). This will help provide more local employment thus reducing commuting to work distance and associated vehicular emissions. By retaining and supporting expansion of existing retail, residents are more likely to continue using local services and retail outlets rather than travelling further afield to obtain such services. This will help reduce travel and also encourage walking/ cycling and use of public transport when travelling to retail and service provisions within the village centres.

Overall (cumulative) effects

In combination, the Plan policies are predicted to have a **minor positive effect** in terms of Climate change.

From a resilience point of view, the allocated sites are not within major flood risk zones. Furthermore, several policies seek to protect and enhance local green space (such as Watling community forest) and GI. This can have benefits with regards to urban cooling, strengthening networks for wildlife, and managing wider flooding.

In terms of mitigation, several policies seek to support walking and cycling and provide local employment and retail to residents thereby reducing need to travel further afield for employment and services.

Appraisal of the high growth alternative (49 dpa)

The majority of the additional sites required for the higher growth alternative are remote from existing services and village centres. This combined with the relatively poor access to public transport would mean increased reliance on cars for travel. This will exacerbate the current traffic congestion experienced at the several pinch points identified in St Stephen lead to an increase in emissions. Furthermore, the loss of agricultural land can potentially impact flood risk resilience. Agricultural fields within catchment areas often positively contribute to flood prevention. This is effected through various mechanisms including water infiltration, flood water storage and attenuation of the speed of peak flood flows. Therefore, the high growth alternative is predicted to produce **minor negative effects** on climate change mitigation and adaptation.

5.6 SEA Objective 3: Historic Environment

Protect, enhance and manage the distinctive character and setting of heritage assets and the built environment

Appraisal findings: Site Allocation

The delivery of housing and employment land within St Stephen has the potential to impact the historic environment, landscape character and the visual setting and amenity of the Neighbourhood Plan area if inappropriately located and designed.

A scheduled monument is a historic building or site that is of national importance and is given protection against unauthorised change. The NP area includes one such monument; the Mohne Dam replica in the grounds of the Building Research Establishment in Garston. There are no site allocations within the SSNP in the vicinity of this monument.

There are two conservation areas designated within the NP area; Old Bricket Wood and Park Street (Frogmore). Policy S29 allocates a small site for housing development which is less than 100m from the Park Street Conservation Area. However, the site does not contain a listed building or historic features and does not contribute to the setting of one (200m from listed building). The Policy states that development here must be appropriate to the character and features of the St Stephen landscape.

Policy S19 proposes the allocations of a new retirement village development in the green belt. The site which currently comprises some horticultural buildings (such as glass houses), is in the vicinity of Burston Manor, a grade II* listed building and therefore could potentially adversely affect the setting of this asset. It is pertinent to point out that a previous application to build a 64 bed care home and 125 assisted-living dwellings, on this site, was rejected in March 2019. Furthermore, the subsequent appeal was dismissed by the Inspector who cited the development's harm to the character and appearance of the area and the harm to the setting of the designated heritage assets, including the grade II* listed Burston Manor, as one of the reasons for dismissing the appeal.

Therefore, with the exception of S19, which is predicted to have a potentially **minor negative** effect on the historic environment; the remaining site allocations within the plan are anticipated to have **neutral effects** on this topic.

Appraisal findings: Draft SSNP Policies

Housing and the built environment

Policy S1 states that development in visually intrusive locations will not be supported unless it can be appropriately mitigated with landscape screening.

Policy S4 requires that the design of development be in keeping with the scale of existing buildings in the area, with high quality boundary treatment and green landscaping and does not result in loss of amenity.

Together, these two policies are predicted to have a **minor positive effect** on the quality of new development, which is likely to have knock-on benefits to the historic environment.

Policy S19 which seeks to allocate a site at Burston Garden Centre as a new retirement village in the green belt could potentially generate adverse impacts as it is in close proximity to listed Burstone Manor, a Grade II listed building. However, as the site already contains horticultural buildings and a Garden centre, the effects of partially replacing these will depend on the scale and design of the proposed retirement village. The Policy requires that development proposals be supported by a Heritage Assessment that assesses potential impacts on the historic built environment. The effect of this policy is therefore anticipated to be **uncertain to neutral**.

The remaining housing development allocations are focused around existing settlements and do not intrude on heritage assets or have inherent value themselves. Therefore development is predicted to have a **neutral** effect on the historic environment in this respect.

Natural and historic environment

Policy S5 requires that new development be appropriate to the character and features of St Stephen landscape. This is deemed to include the historic environment such as Conservation Areas and listed buildings and curtilages. Therefore, this policy is expected to have a **minor positive effect** on the historic environment.

Policies S6-S9 primarily relate to local habitats, landscape and green space rather than heritage assets, therefore these are not expected to have significant effects on the historic environment.

Community facilities

Policy S17 seeks to protect Public Houses in the NP area which include the Grade II listed Three Hammers and the part Grade II listed Black Boy. By seeking to preserve these historic assets for the residents of St Stephen this policy is expected to have a **minor positive effect** on the historic environment. Though these assets would already benefit from a degree of protection through national and local plan policies (and hence the effects are not significant), the NP helps to emphasise the important role of such community buildings (extending to non-listed buildings also).

Transport

Of this set of policies, Policy S12-S14 are likely to have a **positive effect** on the historic environment as they all seek to improve public transport and sustainable travel such walking and cycling. This is likely to make the heritage assets within the Parish more accessible to residents and visitors. There will be a need to ensure that infrastructure and signage is sensitively designed though.

This set of policies is therefore expected to have **positive effects** on the historic environment.

Employment

Policies S21-S23 seek to retain existing employment and village retail facilities in the NP area and support reasonable expansion of existing businesses. Policy S21 states that such expansions could take place in the green belt (if they prove appropriate or demonstrate very special circumstances). No specific reference is made to the historic environment in this group of policies. Therefore, this set of

policies may lead to expansion of businesses and retail in a way that adversely impacts the historic environment in the villages of the Parish. This set of policies therefore is deemed to have potentially uncertain to **minor negative** effects on the historic environment.

Overall (cumulative) effects

Mixed effects are predicted.

The Employment policies relating to expansion of village retail and existing employment land (including in green belt) do not mention the historic environment as a potential constraint to such expansion. Therefore, these have uncertain to **potentially minor negative** effects on the historic environment. It is unlikely that the historic environment would be totally disregarded though given the presence of national and local policies. Therefore, significant effects are unlikely, and it ought to be possible to avoid and mitigate effects.

With regards to site allocations, the majority of sites are unlikely to have any effect upon the historic environment. The proposed allocation of the retirement home is an exception. Given the site's proximity to the Grade II* listed Burston Manor, a development of this scale is likely to have a **minor negative** effect on the historic environment.

There are several **positive effects** identified in relation to policies that seek to protect the local characteristics of the landscape and townscape of St Stephen. In combination, these are unlikely to generate significant positive effects, but ought to help strengthen the protection of important local features and access to them.

Appraisal of the high growth alternative (49 dpa)

Of the additional sites required for the high growth alternative; site L23 and L25 (south of Smug Oak La. and west of Bricket Wood training centre) were assessed as potentially affecting the setting and character of Bricket Wood. However there has been a recent residential development to the south of the site (Hanstead Park). With appropriate design and screening it should be possible to mitigate any potential negative effects on the setting of nearby listed building and monument. Therefore, in terms of the additional sites included in the high growth alternative no additional effects are anticipated to those already identified for the SSNP growth scenario and the effects are therefore the same.

5.7 SEA Objective 4: Landscape

Protect, enhance and manage the distinctive character and appearance of landscapes.

Appraisal findings: Site Allocation

Policy S1 seeks to confine new housing development around existing settlement areas in the village. Although the sites allocated are in the green belt, they are located around the existing settlements. The policy further states that proposals outside of existing Built-up areas will not be permitted unless they are part of strategic allocations in the SACDLP or they relate to utilities infrastructure or proposals appropriate in the green belt. Importantly, development will not be permitted in visually intrusive locations unless supported by appropriate mitigation and landscape screening. Therefore, this policy is anticipated to have **minor positive** effects on the landscape.

In terms of site allocations for housing, Policies S25-S29 generally seek; high quality design and provision of green buffers and green landscaping. They are also required to comply with Policy S4. The latter requires development to be in keeping with the scale of existing buildings in the area and to provide high quality boundary treatment and green landscaping. This group of policies therefore is predicted to have a **minor positive** effect on landscape.

Policy S20 pertaining to the development of a new retirement village on previously developed site in the green belt could result in a visually intrusive scheme here which may contribute to coalescence between Bricket Wood and Chiswell Green. The scale of this development is also likely to change the character of How Wood constituting unrestricted sprawl in a currently vulnerable gap between existing settlements. However, the site partially comprises previously developed land, with existing buildings/development associated within the Burston garden centre/nursery, Hertfordshire Fisheries etc. In light of the site's previously developed (PDL) status, there may be potential for replacing some of the existing uses in the northern part of the site with residential development. This could be further enhanced with landscaping and public access to the resultant green space, as part of the Watling Chase Community Forest. The Policy requires a Heritage Statement to assess the potential impacts on the setting of the historic built environment but is not explicit about visual impacts on the landscape. Therefore, as it stands this allocation / policy is predicted to have potentially **minor negative effects** on landscape.

Policy S26 allocates a 2.3 ha site for up to 60 dwellings at Park Street Baptist Church between Tippendell Lane and Orchard Drive in Park Street. This site was rated Amber in the site assessment report; however, this was primarily due to it being larger than the threshold for Neighbourhood level allocation within policy DLP12 of the 2016 version of the draft SACDLP. The assessment also noted that this site would have some impact on the site's openness and contribute marginally to coalescence between How Wood and Park Street. The assessment adds that Tippendell Lane could form a robust, long term green belt boundary which would separate the site from the open countryside to the north east. The policy requires development here to comply with Policy S4 which states that development must provide high-quality boundary treatment and green landscaping and must not result in loss of amenity or visual intrusion. Therefore, with appropriate mitigation, development in this location is expected to have a **neutral effect** on landscape.

Appraisal findings: Draft SSNP Policies

Housing and the built environment

The SSNP is proposing to provide up to 140 dwellings and a 200 unit retirement village in St Stephen over the plan period. The implications of the site allocation policies are described in the previous paragraph. Of the remaining policies; S4 is anticipated to have **positive effects** on landscape as it seeks high quality design with high quality boundary treatment, green landscaping and provision and extension

of accessible green space. This will help to mitigate the effects of development on the allocated sites as well as applying to general development that is proposed by developers.

Natural and historic environment

Policies S5-S9 are expected to have **significant positive effects** on the landscape as they seek to protect the Watling Chase Community Forest, supporting the creation of trees and woodland. They also seek to; plant small to medium scale plantation of trees/ shrubs and maintain existing and plant new, hedgerows. Development proposals that are likely to harm local landscape features will not be supported, unless it can be demonstrated that they cannot be located elsewhere. In such case compensatory measures must be proposed and the effects offset. Policies S7 and S9 seek to; protect designated local green space and enhance Green Infrastructure (GI).

Community facilities

Policies S15-S18 are anticipated to have **minor positive effects** on landscape as they seek to protect local features of the landscape / townscape such as public houses, allotments and community growing spaces.

Transport

Policies S13-S14 will have **minor positive effects** on landscape within the NP area. This is due to improvements sought to footpaths, bridleways, cycle and walking routes. These features contribute to the landscape and countryside (and access to them), so such improvements/enhancements should have a positive effect on the landscape.

Employment

Policies S21-S24 are predicted to have a **neutral effect** on landscape. The policies offer protection to existing employment locations, supporting reasonable expansion. Retention and expansion of retail in villages is similarly supported where this does not adversely affect the integrity of village centres or wider sustainability of the villages. This approach should help to reduce pressure for development elsewhere; without allowing significant expansion in areas that are sensitive to change.

Overall (cumulative) effects

Overall this group of policies is expected to have mixed effects on Landscape. The proposal for a new retirement village at the Burston Garden centre site can potentially have **minor negative effects** on the landscape in this location.

As for the remaining development proposed through site allocations, these should not produce notable effects on the landscape and with appropriate design, landscaping and screening the effects are likely to be neutral. In combination, other Plan policies could potentially generate **significant positive effects** in the longer term as they seek to protect landscape from inappropriate development, and more importantly seek to achieve increased tree cover in the Watling Chase Community Forest.

Appraisal of the high growth alternative (49 dpa)

The sites required for the higher growth alternative are generally rural in character and lie within the green belt. Development on this scale here is therefore likely to substantially alter the rural landscape to one more urban in character. Some of the sites are also likely to lead to coalescence. Furthermore, some of the sites such as L21 to L24 include wooded areas, landscaped areas, parks, allotments, equestrian land, mature trees and hedgerows. Therefore, the high growth alternative is predicted to produce **significant negative effects** on landscape.

5.8 SEA Objective 5: Population and Housing

Provide everyone with the opportunity to live in good quality, affordable housing which meets the needs of occupiers throughout their life

Appraisal findings: Site Allocation

By directing housing development around the existing main settlements of Bricket Wood, Park Street and Chiswell Green, the SSNP's site allocations are expected to have a **positive effect** on population and housing. The proposed sites are in locations accessible to the key services and facilities present in the villages. They are also in locations relatively accessible to key public transport links and road network. This will support accessibility to key amenities within and outside of the village. Accessibility to services and facilities is a key influence on the quality of life of residents and community cohesion.

The SSNP proposes to allocate up to 140 dwellings across the Parish to contribute to the locally assessed housing needs and to contribute to the strategic housing targets. Furthermore, the plan seeks to provide smaller, more affordable properties for first time buyers to help attract and retain younger residents which will help maintain the vitality and the sustainability of the villages and will also help local workers find homes locally.

Appraisal findings: Draft SSNP Policies

Housing and the built environment

Policy S1 is predicted to have a **minor positive effect** on population and communities as these policies address housing and the built environment. This policy sets out the settlement boundary for the neighbourhood plan area confining new housing development around existing settlement areas in the village by making minor adjustments to the green belt boundary. Development outside of this boundary will not be supported unless they are strategically allocated (through SACDLP) or related to appropriate uses in the green belt.

Policies S2-S3 are predicted to have a **significant positive effect**. The sites allocated for future residential development are supported by the community¹⁴ and have been assessed as suitable options which contribute towards meeting locally assessed housing needs. Though there would still be a shortfall in housing delivery, it is expected that this would be met through strategic sites in the emerging St Albans Local Plan.

In terms of housing mix, S3 supports smaller 1 to 3 bedroom properties and affordable housing for those with local connections. This is positive, as it is what the evidence shows is needed locally.

Policy S20 is predicted to have a **significant positive effect**. The allocation of a site for a retirement village will help current residents remain close to their villages as their residential and care needs evolve with age. The development is allocated for up to 200 units, offering a range of services to support the needs of older residents. This is particularly relevant as the scoping exercise highlighted the increasing proportion of population in the 65+ age group.

Natural and historic environment

Policy S5 – S9 address natural and historic features within the Neighbourhood Area. Policy S5 seeks to protect the natural environment from development impacts, including the Watling Chase Community Forest. Policies S7-S9 seeks to protect and enhance local green space and GI and the setting and functions of the rivers Ver and Colne. Greenspace exposure is associated with wide ranging health benefits including; accelerated recovery from illness, post-operative anxiety and improving and improving mental health by reducing stress, anxiety and depression. Therefore, this group of policies is predicted to have a **positive effect** with regards to population and community.

¹⁴ 76% of respondents in the St Stephen community survey stated that in the event they were to move house, they would like to remain within the Parish, with majority favouring smaller dwellings, such as, bungalows and flats.

Community facilities

Policy S15-S18 will likely have a **minor positive effect**. This is because this group of policies seeks to protect existing community facilities from development by a *strong presumption against redevelopment* of such facilities for no community uses. They also support the provision of leisure facilities for children and teenagers and the retention of public houses and the protection of allotments and community growing places. Overall these provisions are likely to benefit the local population, improve social cohesion and support social capital. They may also help attract families with children or teenagers, which the scoping exercise showed; are currently under represented in the community.

Transport

Transport is vital to the community as it helps reduce social isolation, allows residents to travel to work (including commuting), access health, and leisure and education facilities. Congestion leads to increased localised air (and noise) pollution which has serious long term adverse effects on health. This is in addition to the mental stress and anxiety experienced when waiting in traffic en route to work or an appointment. By seeking to address the traffic congestion concerns expressed by the local community, Policy S10, which seeks improvements to key local junctions and congestion hot spots should help address current and future (due to new development) congestion issues experienced in the Parish. Policy S11 seeks to maintain adequate off-street parking which will further help reduce congestion by reducing the need for drivers to park on the sides of roads hindering traffic flow. Therefore Policies S10-S11 are predicted to have a **minor positive effect** on population.

A good bus service that is affordable and accessible can help facilitate access vital public services and reduce isolation and loneliness. It can also help to connect people to economic opportunities. An efficient, convenient bus services also reduce reliance on the private car, thus helping to further reduce congestion and harmful particulate emissions. Therefore policies S12-14, which seek improvements to bus services within the Parish are predicted to have a **minor positive effect** on population.

Employment

Policy S21 and S23 are predicted to have a **minor positive effect**. These policies seek to ensure that development does not adversely affect existing employment centres and allow reasonable expansion. Policy S22 is also positive as it seeks to support existing village retail areas which provide essential services to the local community. This group of policies therefore are likely to maintain current and create new employment opportunities which can provide more jobs to local people (having knock-on benefits for health). Policy S24 allows people to work from their own homes, thus reducing the need to travel to an office. This is likely to reduce the need to commute to offices located outside the local area which helps reduce the stress associated with driving during rush hour traffic to and from work and also reduces overall car journeys thus reducing vehicular emissions. Therefore, this policy is predicted to have **minor positive effect** on population.

Overall (cumulative) effects

Overall, the plan is predicted to have a **significant positive effect** on population and community. The policies are supportive of improving housing affordability and accessibility, protection of green spaces and community facilities; all of which are important to the community's well-being and social value. In particular, the allocation of housing sites will contribute towards meeting housing needs, helping to maintain the local population.

Appraisal of the high growth alternative (49 dpa)

Two of the of the sites required for the high growth alternative S36 and S49 are currently allocated to employment therefore housing development here is likely to adversely affect employment which may have a minor negative effect on population. However, in terms of housing, the additional development obtainable through the high growth alternative is likely to fulfil all of the locally assessed housing need for St Stephen with up to 890 dwellings provided over the plan period. Overall therefore, this alternative is likely to have **significant positive effects** on housing and population.

5.9 SEA Objective 6: Transport

Support a modal shift to active and sustainable modes of travel such as walking, cycling and public transport. Reduce the need to travel in order to reduce congestion.

Appraisal findings: Site Allocation

The sites allocated within the SSNP align well with the current settlement pattern around the main villages in the Parish. The sites, by virtue of being allocated around existing settlements, are in close proximity to existing services and retail currently provided at the village centres. An expansion of footpaths, bridleways and other walking tracks can promote a sense of community and social cohesion by connecting the neighbourhoods and villages. This can promote walkable neighbourhoods and walkability within the community. The SSNP also seeks improvements to the current road and parking services, improvements to cycle and pedestrian routes, and encouraging active and public transport modes.

On balance, **minor positive effects** are predicted.

Appraisal findings: Draft SSNP Policies

Housing and the built environment

Policy S1 is predicted to have a **minor positive effect** as it will lead to a continuation of existing travel patterns and enable access to existing village services and community facilities. The relatively modest scale of growth proposed is not that likely to significantly affect congestion, either at the individual sites or in combination.

The other housing specific policies do not relate to transportation are therefore predicted to have neutral effects on transport.

Natural and historic environment

Policies S5 – S9 are predicted to have a **neutral effect** on transportation as the emphasis is on environmental protection.

Community facilities

Policies S15 and S16 support the retention of existing community facilities and creation of new facilities for children and teenagers. This is likely to have a minor positive effect as it will reduce the need to travel further afield (usually by private car) to reach such facilities. Therefore, this is likely to bring about **minor positive effects** as it promotes access to local services.

Transport

Policy S10 is predicted to have a **minor positive effect** as it seeks to address current traffic congestion pinch points and also future impacts on this issue resulting from the proposed development growth, both at strategic and NP levels. This issue was identified as particularly important to residents through the background work and consultations that took place throughout the NP process. The policy requires that Transport assessments be prepared for larger sites and Transport statements for smaller sites, according to paragraph 111 of the NPPF. Policy S11 is also predicted to have a **minor positive effect** as it seeks to protect existing car parking areas which will help alleviate current and future congestion at main village retail areas.

Policies S12-14 will have a **positive effect** as they seek improvements to bus services which should further help reduce current and future traffic congestion experienced in the Parish. They also support the provision and enhancement of foot paths, cycle ways and bridleways. This gives greater certainty to the community that there will be services and infrastructure to support their current and future needs.

Employment

Policies S21-S23 support the retention and expansion of existing employment and retail areas (within villages) which allow for an increase in employment opportunities within the settlement boundaries. These are predicted to have a **neutral effect** on transportation as new and existing establishments will utilise existing transport corridors.

Policy S24 is predicted to have a **minor positive effect** on transport as it reduces the need for people to travel to central business districts for work.

Overall (cumulative) effects

Overall, the plan is predicted to have a **minor positive effect** on transportation. This is because the policies seek to improve existing transport infrastructure and promote sustainable and active modes of travel. Whilst positive, the in-combination effects are not predicted to be significant as the magnitude of impacts is minor, and there are unlikely to be any significant infrastructure improvements.

The allocated sites are unlikely to generate a significant amount of traffic individually or cumulatively and could be designed so as to promote sustainable modes of travel. However, it is likely that the cars will remain the dominant mode of travel.

Appraisal of the high growth alternative (49 dpa)

The higher levels of growth will produce a substantial increase in vehicular traffic in the Parish. The majority of the additional sites required for the higher growth alternative are remote from existing services and village centres and assessed to have poor access to the transport network including public transport. These factors combined will exacerbate the current traffic congestion experienced in St Stephen. The increased population may serve to make public transport routes more commercially viable. Therefore, the high growth alternative is predicted to produce **minor negative effects** on transport.

5.10 Conclusions at this current stage

5.10.1 Summary of effects

This section summarises the overall effects of the Plan against each of the SEA Topics. It is important to differentiate between significant effects, which are predicted to lead to changes in the baseline position, and those effects that are broadly positive or negative, but are less likely to lead to substantial changes.

Table 5.1 summarises the overall effects of the policies within the draft Local Plan for each SEA topic.

Table 5.1: Summary of overall effects for each SEA Topic.

	<i>Biodiversity</i>	<i>Climate change</i>	<i>Historic Environment</i>	<i>Landscape</i>	<i>Population and Housing</i>	<i>Transport</i>
<i>SSNP</i>	Minor +ve Minor -ve	Minor +ve	+ve Minor -ve	Sig. +ve Minor -ve	Significant +ve	Minor +ve
<i>High growth Alternative</i>	Significant -ve	Minor -ve	+ve Minor -ve	Significant -ve	Significant +ve	Minor -ve

The plan is predicted to have mostly positive effects, and for one objectives significant positive effects are predicted. However, mixed effects are predicted pertaining to biodiversity and the historic environment. The Plan involves a number of positive policies that identify locally important biodiversity sites; these could potentially have significant benefits.

The policy framework for the historic environment is also positive, but a residual minor negative effect is predicted due to the uncertain impacts of expansion at employment sites and village retail areas.

The main benefits of the Plan relate to communities and housing, as the plan seeks to deliver quality designed, new homes to meet the needs of the local community. It also seeks to provide affordable housing and housing suited for older residents which will support the local population and attract younger families and workers helping to achieve a more sustainable demographic.

The high growth alternative scores less well when compared to the SSNP; scoring a significant negative on Biodiversity and Landscape due to the substantial land take from rural and agricultural areas. It also performs less well in terms of effects on climate change and transport. However, significant positive effect are predicted with respect to population and housing as this option has the potential to meet and exceed the locally assessed housing need for St Stephen.

The St Stephen Parish Council view is that a great majority, if not all, of the housing need will be supplied through strategic allocations in the emerging Local Plan. However, as a result of the delays to the emerging Local Plan, the Neighbourhood Plan has proactively sought to deliver housing to contribute to the wider strategic need as well as addressing local need. The council undertook a Local Call for Sites and the only sites coming back as deliverable were in the Green Belt, which by their nature are smaller sites (around 30 homes). The council chose to include one site that was with a larger capacity; the Baptist Church site (capacity up to 60 dwellings) due to strong community support for the site to be allocated and the potential benefits it can bring to the community.

5.11 Recommendations

A number of recommendations were made to enhance the positive effects of the plan and mitigate any negatives. These are summarised below:

A number of recommendations were made to enhance the positive effects of the plan and mitigate any negatives. These are summarised below:

- Policy S1 does not currently include reference to biodiversity and the historic environment, important topics in the SA framework. This policy could be strengthened by including additional clauses to proffer protection and enhancement (where appropriate) to existing Biodiversity (to achieve net gain) and heritage assets in the Parish.
- Policy S20 could seek to support habitat conservation and enhancement and deliver net gains for biodiversity. As a site specific policy, it is recommended that the policy makes it clear that proposals for the site are subject to other relevant policies of the plan in particular S5 (minimising the environmental impact of development), S4 (design of development) and S6 (protection of natural habitats).
- Consider the inclusion of a policy which seeks to encourage renewable energy infrastructure.
- Consideration should be given to the potential for rural exceptions sites in terms of helping to meet affordable housing needs.
- Consider an alternative location for the retirement village proposed under Policy S20. Whilst any such site is still expected to be in the green belt (due to lack of non-green belt sites) there may be other parcels of green belt land that will have a lesser impact on the five green belt purposes (though there is a need to make a planning balance).

It is considered that the above changes would help to improve the performance of the Plan.

5.12 Monitoring

There is a requirement to present measures that could be used to monitor the effects of the Plan identified through the SEA. It is particularly important to monitor effects that are predicted to be significant, whether this be positive or negative. Monitoring helps to track whether the effects turn-out as expected, and to identify any unexpected effects.

Significant effects	Monitoring measures
A significant positive effect is predicted for population and housing as the Plan will contribute towards meeting local housing needs in accessible locations.	<ul style="list-style-type: none"> • Net housing completions per annum • Number of homes for older people • Affordable housing target achievement

6. What are the next steps?

This Environmental Report should accompany a Regulation 14 version of the St Stephen Neighbourhood Plan for consultation.

To ensure that the final Plan is informed by a robust SEA, the Plan has not yet been submitted to St Albans City and District Council. It is important that stakeholders have sight of the Environmental Report before the Plan is submitted so that they are able to make additional representations on the draft Plan (that are informed by knowledge of the environmental impacts).

Consequently, the Environmental Report will be consulted upon for three weeks.

Following consultation, any additional representations made (both on the Environmental Report and the Plan itself) will be considered by the Neighbourhood Plan Steering Group. The Environmental Report will be updated as necessary to reflect any technical comments, and in response to Plan changes. In particular, it will be important to record how the recommendations made in this SA Report have been taken into consideration when finalising the Plan.

Following that consultation, the SSNP will then be submitted to the Local Planning Authority, SACDC, after any necessary updating of this Environmental Report if significant changes are made to the NP as a result of the Reg 13 consultation. This version will be the formal version submitted under Reg 15 of the Neighbourhood Plans General Regulations 2012.

SACDC will consider whether the plan is suitable to go forward to Independent Examination in terms of the SSNP meeting legal requirements and its compatibility with the Local Plan.

Subject to St. Albans City and District Council's agreement, the SSNP will then be subject to independent examination. The Examiner will consider whether the plan is appropriate having regard to national policy and whether it is in general conformity with local policies.

The Examiner will be able to recommend that the SSNP is put forward for a referendum, or that it should be modified or that the proposal should be refused. SACDC will then decide what should be done in light of the Examiner's report. Where the report recommends modifications to the plan, SACDC will invite the SSNP Steering Group to make modifications to the plan, which will be reflected in an updated Environmental Report. Where the Examiner's Report recommends that the proposal is to be refused, SACDC will do so.

Where the examination is favourable, the SSNP will then be subject to a referendum, organised by SACDC.

If more than 50% of those who vote agree with the plan, then it will be passed to SACDC with a request it is 'made'. Once 'made', the SSNP will become part of the Development Plan for the District.

Appendix A: Scoping Report

See accompanying document.