

# **Sustainability Appraisal and SEA of North Hertfordshire Local Plan Preferred Options**

## **Appendix 9: Appraisal of policies - matrices**

November 2014

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# Methodology

The impact of each of the preferred options on the SA objective is scored as follows:

Major positive	√ √
Positive	√
Major negative	<b>XX</b>
Negative	<b>X</b>
Uncertain	<b>?</b>
Neutral	<b>O.</b>

The assessment is based on the current situation and trends for each objective, including where there are particular problems. This information is contained in appendix 2 (baseline data and key sustainability issues), and has been referred to throughout the process of compiling the matrices.

# Policies: overview and document history

The policies contained in the Local Plan Preferred Options document have been in a process of development since the start of the Core Strategy process in 2005. Some of the policies were included in the Preferred Options Core Strategy and Development Control Policies published for consultation in September 2007, and were appraised at that time (or as part of an earlier iteration produced in November 2006). Other policies are new or significantly changed, and have been appraised or reappraised in August and September 2014. The table below outlines the history of policy development, and when the appraisals took place.

Local Plan Policy reference	Core Strategy/Development Control Policies policy reference	Major changes from previous version	When appraised
Policy SD1: Presumption in favour of sustainable development		New policy	Sept 2014
Policy ETC1: Provision and distribution of employment land	Core Policy J: Provision and distribution of employment		Sept 2007
Policy ETC2: Promoting the knowledge economy	Core Policy K: Promoting the knowledge economy		Sept 2007
Policy ETC3: Appropriate uses in employment areas	Development Policy 22: Appropriate uses in employment areas		Nov 2006
Policy ETC4: Employment development outside employment areas	Development Policy 23: Employment development outside employment areas		Nov 2006
Policy ETC5: Tourism	Development Policy 25 Tourism		Sept 2007
Policy ETC6: Town and Local Centres	Core Policy L: Town and Local Centres		Nov 2006
Policy ETC7: Additional retail floorspace <b>Error! Bookmark not defined.</b>	Core Policy M: Additional retail floorspace		Nov 2006
Policy ETC8: New retail, leisure and other town centre development <b>Error! Bookmark not defined.</b>	Development Policy 26: New retail and leisure development		Nov 2006
Policy ETC9: Primary and secondary shopping frontages <b>Error! Bookmark not defined.</b>	Development Policy 27: Primary and secondary frontages		Nov 2006
Policy ETC10: Local centres	Development Policy 28: Local Centres		Nov 2006
Policy ETC11: Scattered local shops, services and facilities in towns and villages <b>Error! Bookmark not defined.</b>	Development Policy 29: Scattered local shops, services and facilities in towns and villages <b>Error! Bookmark not defined.</b>		Nov 2006
Policy CGB1: Rural area and	Core Policy D: Rural Area and	Separated out the 2	Nov 2006

Local Plan Policy reference	Core Strategy/Development Control Policies policy reference	Major changes from previous version	When appraised
green belt <b>Error! Bookmark not defined.</b>	Green Belt	different elements and recognised that PPS's no longer cover this issue adequately	
Policy CGB2: Rural Areas Beyond the Green Belt <b>Error! Bookmark not defined.</b>	Core Policy D: Rural Area and Green Belt	Separated out the 2 different elements and recognised that PPS's no longer cover this issue adequately	Nov 2006
Policy CGB3 Exception sites in the rural area	Core Policy E: Exception sites in the rural area		Nov 2006
Policy CGB4: Rural Workers' Dwellings <b>Error! Bookmark not defined.</b>	New policy		Aug 2014
Policy CGB5: Existing Rural buildings <b>Error! Bookmark not defined.</b>	Development Policy 13: Rural buildings	Recognising changes in NPPF from PPS7	Nov 2006
Policy T1: Sustainable transport <b>Error! Bookmark not defined.</b>	Development Policy 18: transport Hierarchy of users		Nov 2006
Policy T2: Parking <b>Error! Bookmark not defined.</b>	Development Policy 19: Parking		Nov 2006
Policy HDS1: Housing targets 2011-2031 <b>Error! Bookmark not defined.</b>	Core Policy F: Provision and Distribution of new Housing	Locations and strategy have changed	Reappraised Sept 2014
Policy HDS2: Settlement hierarchy <b>Error! Bookmark not defined.</b>	Core Policy C: Settlement Hierarchy		Nov 2006
Policy HDS3: Affordable housing <b>Error! Bookmark not defined.</b>	Core Policy G: Affordable Housing		Sept 2007
Policy HDS4: Density <b>Error! Bookmark not defined.</b>	Development Policy 14: Density and Mix of dwellings and Mixed Uses		Sept 2007
Policy HDS5: Relatives' and dependants' accommodation	Development Policy 15: relatives' and dependants' accommodation		Nov 2006
Policy HDS6: Gypsies, Travellers and Travelling Showpeople	Development Policy 16: Gypsies and Travelling Showpeople	Policy will also include elements of strategy	Nov 2006
Policy D1: Design and Sustainability	Core Policy B: Design and sustainability and Development Policy 5: Design, safety and sustainability		Nov 2006
Policy D2: House Extensions and Replacement Dwellings		New specific policy on extensions	Sept 2014
Policy D3: Protecting amenity	Development Policy 4: Protecting amenity		Sept 2007
Policy D4: Air quality		New policy covering issues that were previously included in PPS21	Aug 2014

Local Plan Policy reference	Core Strategy/Development Control Policies policy reference	Major changes from previous version	When appraised
Policy HC1: Community, leisure, recreation and cultural facilities <b>Error! Bookmark not defined.</b>	Development Policy 20: Community, leisure, recreation and cultural facilities <b>Error! Bookmark not defined.</b>		Sept 2007
Policy HC2: Green space	Development Policy 21: Open space	New standards included	Sept 2007
Policy NE1: Landscape and Environmental Protection	Core Policy A: Environmental Protection and Development Policy 1: Landscape	Policies combined	A – Sept 2007 1 – Nov 2006
Policy NE2: Green Infrastructure		New policy	Aug 2014
Policy NE3: Biodiversity	Development Policy 2: Biodiversity		Nov 2006
Policy NE4: Renewable energy development	Development Policy 6: Renewable Energy Development		Nov 2006
Policy NE5: Delivering sustainable water supply	Development Policy 8: Water Resources	Policy has changed	Reappraised Sept 2014
Policy NE6: Reducing flood risk	Part of Development Policy 8: Water Resources	Previous policy mentioned the issue but not in enough detail	Reappraised Aug 2014
Policy NE7: Water quality and environment		New policy	Aug 2014
Policy NE8: Water Framework Directive and wastewater infrastructure	Part of Development Policy 9: Sewerage Infrastructure	Previous policy mentioned the issue but not in enough detail	Nov 2006
Policy NE9: Contaminated land <b>Error! Bookmark not defined.</b>	Development Policy 10: Contaminated land		Nov 2006
Policy HE1: Heritage Strategy	Development Policy 3: Heritage	Policy has changed to reflect NPPF, however approach is similar	Sept 2007
Policy ID1: Infrastructure requirements and developer contributions <b>Error! Bookmark not defined.</b>	Core Policy N: Delivery		Nov 2006
Policy ID2: Masterplans		New policy	Sept 2014

# Appraisal Matrices

The following pages contain the appraisal matrices relevant to each of the Local Plan Policies. As noted in the previous section, some of these matrices are actually appraisals of earlier versions of the policies. In a number of cases a number of earlier versions of the policies have been combined into one. In these cases there are several relevant matrices, which together form the appraisal of the current policy.

The matrices are presented according to the Local Plan chapters.

## Vision and objectives

<b>Policy SD1: Presumption in favour of sustainable development</b>				
<p>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</p> <p>Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.</p> <p>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</p> <ol style="list-style-type: none"> <li>any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</li> <li>specific policies in that Framework indicate that development should be restricted.</li> </ol>				
<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	√	√	√	This policy should support delivery of projects which bring provide employment and support the rural economy, and provide affordable housing.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	0	0	0	No significant impact, as this issue is dealt with by policies in the Plan.
2(b) Provide access to green spaces	?	?	?	May support provision of greenspaces.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	0	0	0	No significant impact, as this issue is dealt with by policies in the Plan.
<b>ENVIRONMENTAL PROTECTION</b>				

3(a) Protect and enhance biodiversity	0	0	0	No significant impact, as this issue is dealt with by policies in the Plan.
3(b) Protect and enhance landscapes	0	0	0	No significant impact, as this issue is dealt with by policies in the Plan.
3(c) Conserve and where appropriate, enhance the historic environment	0	0	0	No significant impact, as this issue is dealt with by policies in the Plan.
3(d) Reduce pollution from any source	0	0	0	No significant impact, as this issue is dealt with by policies in the Plan.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	?	?	?	May support provision of renewable energy provision
4(b) Improve the District's ability to adapt to climate change	0	0	0	No significant impact, as this issue is dealt with by policies in the Plan.
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	?	?	√	May support the regeneration of deprived areas and employment provision
5(b) Provide access to services and facilities for all	?	?	?	May support provision of community facilities.
5(c) Promote community cohesion	0	0	0	No significant impact, as this issue is dealt with by policies in the Plan.
5(d) Increase access to decent and affordable housing	√	√	√	This policy should support delivery of projects which provide affordable housing.
5(e) Reduce crime rates and fear of crime	0	0	0	No significant impact, as this issue is dealt with by policies in the Plan.
5(f) Improve conditions and services that engender good health and reduce health inequalities	?	?	?	May support provision of health facilities.
5(g) Increase participation in education and life-long learning	?	?	?	May support provision of education facilities.
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	?	?	?	May support provision of recreational and cultural facilities.
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	0	0	0	No significant impact, as this issue is dealt with by policies in the Plan.
6(b) Reduce waste	0	0	0	No significant impact, as this issue is dealt with by policies in the Plan.
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	?	?	?	May support projects which improve town centres.
<p><b>Conclusions</b> This policy promotes an effective and positive planning process which should help deliver projects which provide housing, jobs and community facilities.</p> <p><b>Uncertainties</b> The effects of this policy will depend on the specifics of individual planning applications.</p> <p><b>Recommendations/Mitigation</b> None identified.</p>				



## Economy and town centres

<b>Economy &amp; Town Centres Policy ETC1: Provision and distribution of employment land</b>				
<p>The Council will bring forward or safeguard an adequate supply and range of employment land in Hitchin, Letchworth Garden City, Baldock and Royston to meet the requirements of the local economy over the plan period to 2031. The proposals map designates appropriate employment areas to enhance and safeguard employment potential. Additional employment land is identified at the former Power Station, Letchworth (1.5ha); east of Baldock (8ha); and west of Royston (10.9ha).</p> <p>Through the master planning process in major new developments the Council will work with landowners and developers, and (for developments on the edge of the district) adjoining authorities, to identify an appropriate amount of employment land to be included.</p> <p>The Council will regularly monitor employment floorspace and the creation of jobs. Should monitoring show that there is an under-provision of employment which is harming the local economy, the Council may bring forward some of the safeguarded land identified on the proposals maps during the plan period.</p>				
<p><i>Provision of the specific employment sites has been appraised separately (see Appendix 7). The appraisal of an earlier version of this policy is shown below.</i></p>				
<b>J Provision and distribution of employment</b>				
<p>We will bring forward and safeguard an adequate supply and range of employment land to meet the requirements of the local economy over the period to 2021. In the parts of the district affected by the potential growth of Stevenage and/or Luton, the amount of employment development will be determined in the Area Action Plans for those areas. In the remainder of the district, that requirement is estimated to be 7-8 hectares of additional employment land between 2001 and 2021. The indicative target for additional jobs in the district between 2001 and 2021 is 7,640.</p> <p>We will regularly monitor employment floorspace and the creation of jobs. We may bring more land forward during the period, should monitoring show that there is an under-provision of land which is harming the local economy.</p>				
<b>SA Objectives</b>	<b>What is predicted effect of the option on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	√?	√?	√√?	The main sustainability issues relating to this objective are improving the quality of local employment (specifically reducing the pay gap between local and other employment) and competition with nearby larger centres. It is unclear what effect this policy will have on the quality of employment, though it would retain local employment. With regard to competition with other centres, this policy would clearly assist the existing centres in meeting competition, but the degree to which this benefited the local economy would depend on the nature of the businesses retained by this policy. Both issues therefore point to a need for monitoring the mix and quality of jobs available in the District. Finally, as the preamble notes, provision of employment land only addresses classes B1, B2 and B8 which are around 50% of all employment .

				The mix of employment provision is also addressed by other policies, such as Development policy 14 on promoting mixed use development.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	?	?	?	The policy does not address the location of new employment land. This is an issue which will be addressed in the Land Allocations DPD and Area Action Plans.
2(b) Provide access to green spaces	0	0	0	
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	0	√?	√?	The Employment Land Review predicts a significant increase in levels of commuting out of the District over the period to 2021. It notes that only 51% of North Herts residents work in the District and only 63% of jobs in the District are filled by local people. It also predicts that the job deficit will increase from 6,275 in 2001 to 16,132 in 2021. <sup>1</sup> As the preamble notes (7.11), the aim of the policy is to <i>support an increase in job numbers which is broadly in line with the predicted increase in the economically active population, to give the opportunity for the increased population to work locally.</i> However, the number of additional jobs which the policy aims to provide assumes that the level of outcommuting would remain unchanged (7.10) which is at odds with the Employment Land Review predictions. However, providing more local employment is a necessary prerequisite in countering the trend for more out-commuting, though it will need to be allied with other policy measures. The Review comments <sup>2</sup> <i>allocations of additional land may do little to reduce gross commuting flows given the lack of control over employers' labour markets and suggests policies to encourage green travel plans may be more effective mechanisms for reducing car use.</i> The actual location of the employment land, and its accessibility by public transport, walking and cycling is also clearly important. This issue is central to the sustainability of employment provision, but the strategic issue is more appropriately dealt with in the transport core policy. Ensuring the actual location is accessible should be addressed in the Land Allocations DPD and the Area Action Plans.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	?	?	?	Depends on details of development on sites.
3(b) Protect and enhance landscapes	?	?	?	Depends on location of sites.
3(c) Conserve and where appropriate, enhance the	?	?	?	Depends on details of development on sites

<sup>1</sup> *Employment Land Review Part 1* Bone Wells Associates, Feb 2006 para 7.12

<sup>2</sup> *Employment Land Review Part 2 Draft* November 2006 Para 8-14

historic environment				
3(d) Reduce pollution from any source	X?	X?	X?	New developments will inevitably result in some noise and pollution. The nature of this impact will depend on the type of development.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	√?	√?	√?	Development will invariably mean increases in CO <sup>2</sup> . However, as discussed above, if this policy can help avoid the projected increase in net out-commuting, it will have a positive impact.
4(b) Improve the District's ability to adapt to climate change	?	?	?	Depends on the location of sites developed. Would be addressed by Development policy 8.
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	?	?	?	If the sites were accessible by public transport, they would be more accessible to local people and therefore could provide more jobs for unemployed people in Hitchin and Letchworth particularly although there is no guarantee that the jobs would go to local people. Providing a mix of employment provision would minimise the need to travel and therefore maximise the opportunities for part time employment, for example for those with caring responsibilities. This is noted in the Core Strategy Document (key issue 4). This issue should also be addressed in the Land Allocations DPD and Area Action Plans. See also comments above (1) re scope of this policy.
5(b) Provide access to services and facilities for all	?	?	?	See above. Locally accessible employment also benefits young people.
5(c) Promote community cohesion	√	√	√	Enabling people to work locally should have a positive impact on community cohesion.
5(d) Increase access to decent and affordable housing	0	0	0	
5(e) Reduce crime rates and fear of crime	0	0	0	
5(f) Improve conditions and services that engender good health and reduce health inequalities	?	?	?	New development would result in increased ambient noise. However, the impact would depend on the details of the location and type of development.
5(g) Increase participation in education and life-long learning	0	0	0	
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	0	0	0	
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	?	?	?	Depends on the nature of the new uses
6(b) Reduce waste	?	?	?	Depends on the nature of the new uses
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	?	?	?	Depends on the impact of these sites on town centre provision of services, particularly business services.

**Conclusions:**

- The policy should have a significant positive impact on the sustainable economic growth. The main sustainability issues relating to this objective are improving the quality of local employment (specifically reducing the pay gap between local and other employment) and competition with nearby larger centres. It is unclear what effect this policy will have on the quality of employment, though it would retain local employment. With regard to competition with other centres, this policy would clearly assist the existing centres in meeting competition, but the degree to which this benefited the local economy would depend on the nature of the businesses retained by this policy. Both issues therefore point to a need for monitoring the mix and quality of jobs available in the District
- The policy could also have a significant positive impact on sustainable location patterns and reducing transport use and greenhouse gas emissions. The Employment Land Review predicts a significant increase in levels of commuting out of the District over the period to 2021. It notes that only 51% of North Herts residents work in the District and only 63% of jobs in the District are filled by local people. It also predicts that the job deficit will increase from 6,275 in 2001 to 16,132 in 2021.<sup>3</sup> As the policy preamble notes (7.11), the aim of the policy is to *support an increase in job numbers which is broadly in line with the predicted increase in the economically active population, to give the opportunity for the increased population to work locally*. However, the number of additional jobs which the policy aims to provide assumes that the level of outcommuting would remain unchanged (7.10) which is at odds with the Employment Review predictions. Nevertheless, providing more local employment is a necessary prerequisite in countering the trend for more out-commuting, though it will need to be allied with other policy measures. The Review comments<sup>4</sup> *allocations of additional land may do little to reduce gross commuting flows given the lack of control over employers' labour markets and suggests policies to encourage green travel plans may be more effective mechanisms for reducing car use*.
- The impact on transport use and greenhouse gas emissions is more likely to be positive if the employment land provided is accessible by public transport, walking and cycling. This should be addressed in the Land Allocations DPD and the Area Action Plans.
- The policy could also have significant positive impacts on meeting the needs of local unemployed and those with special needs, such as carers, depending on site location. If the sites were accessible by public transport, they would be more accessible to local people and therefore could provide more jobs for unemployed people in Hitchin and Letchworth particularly although there is no guarantee that the jobs would go to local people. In addition, providing a mix of employment provision would minimise the need to travel and therefore maximise the opportunities for part time employment, for example for those with caring responsibilities.

**Uncertainties**

- There are significant uncertainties arising from projections about future job requirements, and commuting. These uncertainties also make it difficult to define the detailed effects of the policy.

**Recommendations/Mitigation:**

- The policy notes that the Council will regularly monitor employment floorspace and the creation of jobs. It is recommended that this monitoring specifically address the issues of the accessibility and mix of the jobs available to local people. This can be done by monitoring the jobs in each of the four centres.
- The assumption on future levels of outcommuting should be revisited, given the Employment Land Study projections.
- Accessibility of the employment land by non-car means should be strongly considered in the development of the Land Allocations DPD and the Area Action Plans.

**NHDC Response**

The Council will monitor new jobs created through new floorspace, in the four towns.

The Council has sought views on the assumptions on future levels of outcommuting from Hertfordshire County Council's Economic Research Manager. It is his view that there are no more robust methods available for assessing future levels of outcommuting than those in the Employment Land Review. As such no change proposed to the assumptions in the Employment Land Review on commuting.

Accessibility of employment land by non-car means will be considered in land Allocations DPD and

<sup>3</sup> *Employment Land Review Part 1* Bone Wells Associates, Feb 2006 para 7.12

<sup>4</sup> *Employment Land Review Part 2 Draft* November 2006 Para 8-14

Area Action Plans.

**Economy & Town Centres Policy ETC2: Promoting the knowledge economy**

The Council will promote and support the expansion of the knowledge based economy in the district. It will be supportive of proposals for the redevelopment of existing employment sites and the development of new allocated employment sites which increase the level of knowledge-intensive employment.

*The appraisal of an earlier version of this policy is shown below.*

**K Promoting the knowledge economy**

In partnership with Hertfordshire Prosperity, the Learning and Skills Council, North Hertfordshire College and other relevant stakeholders, we will promote and support the expansion of the knowledge based economy in the District. We will be supportive of proposals for the redevelopment of existing employment sites which increase the level of knowledge-intensive employment.

SA Objectives	What is predicted effect of the option on each SA objective?			Justification for assessment and recommendations for mitigation/improvement
	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	√?	√	√√	This policy will address the key sustainability issue of improving the quality of local employment (specifically reducing the pay gap between local and other employment) which is noted in the preamble (7.20). The Employment Land Study notes that <i>the District population has an above average skill level, with noticeably more people with NVQ3 and 4 than the county, and much better than the region.</i> <sup>5</sup> This implies that there is not a general skills issue. However, providing local employment does not ensure the work goes to local people, and there still may be a need for specific training and targeting of local residents.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	?	√	√	The policy supports the redevelopment of existing sites.
2(b) Provide access to green spaces	0	0	0	
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√?	√?	√√?	As noted in the review of the previous policy only 51% of North Herts residents work in the District and only 63% of jobs in the District are filled by local people. Given the high skill level in the District, discussed above (objective 1) this policy is likely to encourage more local residents to work in the District, although it cannot ensure it.
<b>ENVIRONMENTAL PROTECTION</b>				

<sup>5</sup> *Employment Land Review Part 1* Bone Wells Associates, Feb 2006 para 2.19

3(a) Protect and enhance biodiversity	?	?	?	Depends on details of development on sites.
3(b) Protect and enhance landscapes	?	?	?	Depens on location of sites.
3(c) Conserve and where appropriate, enhance the historic environment	?	?	?	Depends on details of development on sites
3(d) Reduce pollution from any source	√?	√?	√?	If this policy results in change in use of employment sites, it may result in reductions in noise and pollution.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	√?	√?	√?	As discussed above, if this policy can help avoid the projected increase in net out-commuting, it will have a positive impact.
4(b) Improve the District's ability to adapt to climate change	?	?	?	Depends on the location of new sites developed. Would be addressed by Development policy 8.
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	?	?	?	The impact on deprived areas would depend on the location of development and whether it was accessible by public transport, cycling and walking.
5(b) Provide access to services and facilities for all	?	?	?	See above. Locally accessible employment also benefits young people.
5(c) Promote community cohesion	√	√	√	Enabling people to work locally should have a positive impact on community cohesion.
5(d) Increase access to decent and affordable housing	0	0	0	
5(e) Reduce crime rates and fear of crime	0	0	0	
5(f) Improve conditions and services that engender good health and reduce health inequalities	√?	√?	√?	If this policy results in change in use of employment sites, it may result in reductions in noise and pollution.
5(g) Increase participation in education and life-long learning	0	0	0	
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	0	0	0	
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	√?	√?	√?	If this policy results in change in use of employment sites, it may result in reductions in resource use.
6(b) Reduce waste	√?	√?	√?	If this policy results in change in use of employment sites, it may result in reductions in waste.
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	0	0	0	
<p><b>Conclusions:</b></p> <ul style="list-style-type: none"> <li>This policy is likely to have a significant positive impact on sustainable economic growth. It will address the key sustainability issue of improving the quality of local employment (specifically reducing the pay gap between local and other employment) which is noted in the preamble (7.20). The Employment Land Study notes that <i>the District population has an above average skill level, with noticeably more people with NVQ3 and 4 than the county, and much better than the region.</i><sup>6</sup> This implies that there is not a general skills issue. However, providing local</li> </ul>				

<sup>6</sup> *Employment Land Review Part 1* Bone Wells Associates, Feb 2006 para 2.19

employment does not ensure the work goes to local people, and there still may be a need for specific training and targeting of local residents.

- The policy could also have a significant positive impact on car use and greenhouse gas emissions, as it is likely to encourage more local residents to work in the District, although it cannot ensure it.
- The policy is likely to have a significant positive impact on the use of greenfield land by promoting reuse of existing sites. This element of the policy may also have significant positive impacts on pollution, health, resource use and waste.

***Uncertainties***

- Some impacts depend on the actual location of developments.

***Recommendations/Mitigation:***

It is recommended that the preamble or policy refer to encourage the take up of any new jobs by local people by providing specific training and targeting recruitment at local residents.

**NHDC Response**

Amend supporting text as stated.

## **Economy & Town Centres Policy ETC3: Appropriate uses in employment areas**

### **A. Employment uses in employment areas**

In allocated employment areas development proposals for B1, B2 or B8 uses will be permitted subject to other relevant policies in the Local Plan. Proposals for Class B8 development must be easily accessible from the primary road network. Within those parts of the employment areas designated for business use only, the Council will resist proposals for employment uses other than B1. Employment areas and business use only areas are identified on the proposals map.

### **B. Other uses in employment areas**

There will be a presumption against the loss of existing employment land and premises (B1/B2/B8) in the allocated employment areas, as well as a presumption against any new development proposals which are not in these use classes.

Development proposals which are partly B class uses, or which are sui generis, such as: tyre and exhaust centres, trade wholesalers, vehicle hire, plant hire, taxi vehicle depots, motor trade uses and other uses, will be assessed on their merits. When assessing such proposals, the Council will give consideration to:

3. employment generation on site;
4. impact on relevant town centres;
5. where appropriate, the level and type of retail involved on the site;
6. any potential benefits to the community or surrounding businesses from the proposed use;
7. the proportion of the site to be used for sales and display as opposed to repairs and servicing, in the case of motor trade uses; and
8. Accessibility by non car modes of transport.

In addition to the bullet points above, and in line with the NPPF, the Council will permit proposals for other non-employment uses not mentioned so far, where it can be clearly demonstrated (through marketing information, feasibility and viability studies) that:

- a. the land or premises is no longer required to meet future employment needs of the district; and
- b. the land or premises is inappropriate or unfeasible for employment use, based on market conditions or amenity problems; and
- c. it would be accessible to pedestrians, cyclists, and those travelling by passenger transport; and
- d. no other suitable sites outside designated employment areas are viable and available.

For non-B uses, the Council will consider applying conditions restricting the use of the site to the specific use permitted.

In all cases where permission is granted for employment uses travel plans will need to be implemented.

*The appraisal of an earlier version of this policy is shown below.*

### **B1 Acceptable Uses in Employment Areas**

#### *A) Employment uses in employment areas*

In the designated employment areas a proposal for a B1, B2 or B8 use will be permitted subject to the following criteria:

- The proposal would not have an unacceptable impact on the local and/or strategic transport infrastructure;
- The proposal would not harm the amenities of any nearby residential properties;
- The development would provide adequate parking, servicing and access;
- Any retail element of the development would clearly be ancillary to the main business use.

Proposals for Class B8 development should be well located to the primary road network. Within those parts of the employment areas designated for business use only (EB), proposals for employment uses other than B1 will be resisted.

#### *B) Other uses in employment areas*

There will be a presumption against the loss of existing employment land and premises (B1/B2/B8), in the employment areas as well as a presumption against any new proposals in an employment area which are not in these use classes.



Proposals for composite employment type uses which do not fall solely within the B use classes, or are sui generis, such as: tyre and exhaust centres, trade wholesalers, vehicle hire, plant hire and taxi vehicle depots, will be assessed on their merits. When considering such proposals, the Council will give consideration to:

- employment generation on site;
- impact on relevant town centres;
- where appropriate, the level and type of retail involved on the site;
- any potential benefits to the community of the proposed use; and
- transport and environmental impacts.

Where the proposal is for a motor trade use and has a gross external floorspace of more than 235 sq. metres, no more than 49% shall be used for the sale and display of motor vehicles and vehicle parts and accessories, including ancillary floorspace to such sale and display. The balance of floorspace shall be used for Class B uses such as vehicle repairs and servicing.

Proposals for any other non-employment use, not mentioned so far, will only be permitted where it can be clearly demonstrated that:

- the land or premises is no longer required to meet future employment needs of the district;
- the land or premises is inappropriate or unfeasible for employment use based on market conditions; and
- no other suitable sites outside the employment area are viable and available.

All such proposals will also be required to satisfy the criteria in policy B3(A) above, and other relevant policies of the Plan relating to the use proposed.

In all cases where permission is granted for non-B uses, consideration will be given to applying conditions restricting the use of the site to the specific use permitted.

SA Objectives	What is predicted effect of the option on each SA objective?			Justification for assessment and recommendations for mitigation/improvement
	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	√	√	√√	See comments on the appraisal of Core Policy 17. By safeguarding employment uses B1, B2 and B8 this policy is likely to have a positive impact on the quality of local employment
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	0	0	0	
2(b) Provide access to green spaces	0	0	0	
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√	√	√	The sites are mainly on the edge of the towns. They are existing sites, and the presumption against retail should help avoid additional car use. Policy T6 should address transport issues for larger proposals. It is recommended that this be specifically mentioned in the policy or accompanying text.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	0	0	0	
3(b) Protect and enhance landscapes	0	0	0	
3(c) Conserve and where appropriate, enhance the historic environment	0	0	0	
3(d) Reduce pollution from any source	X?	X?	X?	Depends on the nature of the new uses. There are clearly potential noise and air pollution issues from some of the sui generis uses.
<b>CLIMATE CHANGE</b>				

4(a) Reduce greenhouse gas emissions	√	√	√	See comments under 2(c) above.
4(b) Improve the District's ability to adapt to climate change	○	○	○	Existing sites.
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	√?	√?	√?	Safeguarding these uses should provide employment opportunities for local people, though there is no guarantee that jobs would go to locals. It could also encourage entrepreneurial activity in Letchworth and Hitchin particularly, which have been identified as being of greater need.
5(b) Provide access to services and facilities for all	?	?	?	Depends on whether it would help meet local needs for services.
5(c) Promote community cohesion	○	○	○	
5(d) Increase access to decent and affordable housing	○	○	○	
5(e) Reduce crime rates and fear of crime	○	○	○	
5(f) Improve conditions and services that engender good health and reduce health inequalities	X?	X?	X?	Depends on the nature of the new uses. There are clearly potential noise issues from some of the sui generis uses.
5(g) Increase participation in education and life-long learning	○	○	○	
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	?	?	?	Other uses could include recreational or leisure facilities.
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	?	?	?	Depends on the nature of the new uses
6(b) Reduce waste	?	?	?	Depends on the nature of the new uses
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	√	√	√	Section B takes account of town centre impact.
<p><b>Conclusions:</b></p> <ul style="list-style-type: none"> <li>• See comments on the appraisal of Core Policy 17. By safeguarding employment uses B1, B2 and B8 this policy is likely to have a significant positive impact on the quality of local employment.</li> <li>• The sites are mainly on the edge of the towns. They are existing sites, and the presumption against retail should help avoid additional car use. Policy T6 should address transport issues for larger proposals. It is recommended that this be specifically mentioned in the policy or accompanying text.</li> <li>• Safeguarding these uses should provide employment opportunities for local people, though there is no guarantee that jobs would go to locals. It could also encourage entrepreneurial activity in Letchworth and Hitchin.</li> </ul> <p><b>Uncertainties:</b></p> <ul style="list-style-type: none"> <li>• As with the core policies 16 and 17 there are uncertainties on future impacts due to lack of detailed data. Some impacts, such as air pollution and resource use depend on the nature of any new uses.</li> </ul> <p><b>Recommendations/Mitigation:</b></p> <ul style="list-style-type: none"> <li>• Section A or accompanying text link to policy T6 on travel plans.</li> <li>• Consideration criteria in Section B should include accessibility by non-car means.</li> <li>• Mitigation of impacts of development is most appropriately addressed by other policies particularly those in sections 2, 3 and 9.</li> </ul>				

**NHDC Response**

The Council does not wish to cross-refer to other policies in the plan unless it is necessary. The Core Strategy/DC policies document should be read as whole. Can see no overwhelming reason T6 needs a cross reference.

Include extra bullet point in section B regarding accessibility by a variety of means of transport.

### Economy & Town Centres Policy ETC4: Employment development outside employment areas

The Council will permit development proposals for employment uses outside of designated employment areas, where consistent with the principles of sustainable development and where there are no significant impacts on living conditions.

More significant developments will need to provide evidence that there are no more suitable and available sites within the existing employment areas.

The Council is supportive of B1 office developments in the four main town centres of Hitchin, Letchworth Garden City, Baldock and Royston, where they do not conflict with retail policies and proposals, or relevant aspects of adopted town centre strategies.

The Council will only permit the loss of existing employment uses, where it can be demonstrated that :

the land or premises is no longer required to meet future employment needs of the local community; and/or

the existing use has an adverse impact on the amenities of surrounding land uses; and/or

the existing use is detrimental to highway safety.

The Council will permit sustainable development proposals for farm and other land based diversification schemes that benefit the rural area. Proposals for the re-use or redevelopment of rural buildings for employment purposes will be subject to Policy CGB5.

*The appraisal of an earlier version of this policy is shown below.*

#### B2 Employment Development outside Employment Areas

Proposals for employment uses outside of the designated employment areas, but within existing settlements, will be permitted subject to the following criteria:

- The proposal would not have an unacceptable impact on the transport infrastructure;
- The proposal would be appropriate to the scale and character of the area;
- The proposal would not harm the amenities of any nearby residential properties;
- The development would provide adequate parking, servicing and access;
- The proposal would not be contrary to other policies on town and local centres.

The Council will be supportive of B1 office developments in the four main town centres of Hitchin, Letchworth Garden City, Baldock and Royston, where they do not conflict with retail policies and proposals, or relevant aspects of adopted town centre strategies, and are of scale which is appropriate to the particular centre.

Proposals involving the loss of employment (B use) floorspace outside of employment areas, will only be permitted where it can be demonstrated that there is no longer a demand for an employment use on the site, and documentary evidence has been provided that all reasonable attempts to sell or let the premises for a similar use over a six month period have failed.

Proposals for the re-use or redevelopment of rural buildings for employment purposes will be subject to policy S2.

SA Objectives	What is predicted effect of the option on each SA objective?			Justification for assessment and recommendations for mitigation/improvement
	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and	√	√	√√	As noted above, the main sustainability issues relating to this objective are

economic growth				improving the quality of local employment (specifically reducing the pay gap between local and other employment) and competition with nearby larger centres. By supporting office developments, this policy should have a positive effect on the quality of employment. With regard to competition with other centres, the Employment Study notes, this competition is likely to increase, particularly with the proposed West Stevenage expansion (though in fact the expansion would be mainly located in North Herts District). It also notes that the weakness of the area in the office sector is likely to inhibit its ability to share in this growth. By supporting office developments in the main town centres, this policy is therefore likely to have a positive impact on the local economy.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	?	?	?	Depends on location.
2(b) Provide access to green spaces	0	0	0	
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√?	√?	√?	See comments under appraisal of core policies 16 and 17. Accessibility by non-car means is also an issue here.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	?	?	?	Depends on site.
3(b) Protect and enhance landscapes	0	0	0	Policy relates to developments in existing settlements.
3(c) Conserve and where appropriate, enhance the historic environment	?	?	?	Depends on site.
3(d) Reduce pollution from any source	X?	X?	X?	New developments will inevitably result in some noise and pollution. The nature of this impact will depend on the type of development. However, it would be controlled through other policies such as D9 and D12.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	X?	X?	X?	Likewise, new developments will inevitably result in additional CO2 emissions, though these would be mitigated by other policies.
4(b) Improve the District's ability to adapt to climate change	?	?	?	Depends on site.
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	?	?	?	As discussed in the appraisals of Core policies 16 and 17, this depends on the mix and accessibility of employment provided.
5(b) Provide access to services and facilities for all	?	?	?	As discussed in the appraisals of Core policies 16 and 17, this depends on the mix and accessibility of employment provided.
5(c) Promote community cohesion	√	√	√	Enabling people to work locally should have a positive impact on community cohesion.

5(d) Increase access to decent and affordable housing	0	0	0	
5(e) Reduce crime rates and fear of crime	0	0	0	
5(f) Improve conditions and services that engender good health and reduce health inequalities	X?	X?	X?	New development would inevitably result in increases in ambient noise, though this would depend on their location and nature.
5(g) Increase participation in education and life-long learning	0	0	0	
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	0	0	0	
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	?	?	?	Depends on the nature of the new uses
6(b) Reduce waste	?	?	?	Depends on the nature of the new uses
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	√	√	√	The support for office developments should have a positive impact on the vitality of town centres.
<p><b>Conclusions:</b></p> <ul style="list-style-type: none"> <li>As with Core 16, this policy should have a significant positive impact on sustainable economic growth. The main sustainability issues relating to this objective are improving the quality of local employment (specifically reducing the pay gap between local and other employment) and competition with nearby larger centres. By supporting office developments, this policy should have a positive effect on the quality of employment. With regard to competition with other centres, the Employment Study notes, this competition is likely to increase, particularly with the proposed West Stevenage expansion (though in fact the expansion would be mainly located in North Herts District). It also notes that the weakness of the area in the office sector is likely to inhibit its ability to share in this growth. By supporting office developments in the main town centres, this policy is therefore likely to have a positive impact on the local economy.</li> <li>The support for office developments should also have a significant positive impact on the vitality of town centres.</li> <li>As with Core policies 16 and 17, this policy is likely to have a significant positive impact on sustainable location patterns, reduction in car use and reduction of greenhouse gas emissions. However, accessibility by non car means would depend on the location of the development.</li> </ul> <p><b>Uncertainties:</b></p> <ul style="list-style-type: none"> <li>As with the other employment policies, there are uncertainties about future employment demand, and there is a need to monitor the location, accessibility and type of future employment provision.</li> <li>A number of impacts depend on the nature and location of new business developments.</li> </ul> <p><b>Recommendations/Mitigation:</b></p> <ul style="list-style-type: none"> <li>No changes recommended</li> <li>Mitigation of impacts of development is most appropriately addressed by other policies particularly those in sections 2, 3 and 9.</li> </ul> <p><b>NHDC Response</b> None required</p>				

## Economy & Town Centres Policy ETC5: Tourism

The Council supports development proposals which increase the attractiveness of the district as a tourist destination, or which improve visitor accommodation. It will permit proposals for sustainable tourist and visitor attractions, facilities and accommodation within town centres, outside of primary shopping frontages and other locations within settlements.

In the rural area proposals will need to provide evidence why they cannot be accommodated within existing settlements and how they will support the rural economy.

We will consider all development proposals in terms of:  
 the sustainability of the location, scale and extent of the development;  
 the expected level of activity;  
 the number of visitors;  
 the intensity of use; and  
 the impact on the highway network.

*The appraisal of an earlier version of this policy is shown below.*

### 25 Tourism

We support development proposals which increase the attractiveness of the district as a tourist destination, or which improve visitor accommodation. We will permit proposals for tourist and visitor attractions, facilities and accommodation within town centres, outside of primary shopping frontages, and other locations within settlements, subject to other policies in the LDF.

We will consider all development proposals in terms of the location, scale and extent of the development; the expected level of activity; the numbers of visitors; and the intensity of use. Proposals for bed and breakfast accommodation must be ancillary to the primary residential use of the dwelling.

In all proposals for tourist related development, we will balance the potential benefits to the local economy of the development, against any environmental impacts.

SA Objectives	What is predicted effect of the option on each SA objective?			Justification for assessment and recommendations for mitigation/improvement
	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	√	√	√	Should promote sustainable tourism.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	√	√	√	Policy prioritises uses within settlements.
2(b) Provide access to green spaces	?	?	?	Rural proposals could provide access to the countryside.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√	√	√	Policy allows uses in town centres, and should assist in encouraging public transport access. However, this cannot be guaranteed, particularly on the edge of settlements and rural areas, and the reality is that most people would drive anyway.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	?	?	?	Depends on location. Rural proposals could have adverse effects, or could help protect and improve biodiversity. Policy says that it will balance benefits to the economy against environmental benefits, but it is

				not clear how this will be done.
3(b) Protect and enhance landscapes	?	?	?	Depends on location. See comments above re balancing environmental impacts.
3(c) Conserve and where appropriate, enhance the historic environment	?	?	?	Depends on location
3(d) Reduce pollution from any source	?	?	?	Traffic to rural proposals could increase ambient noise.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	√	√	√	See comments on transport above.
4(b) Improve the District's ability to adapt to climate change	?	?	?	Depends on location
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	?	?	?	Depends whether tourism businesses provide employment for local unemployed people.
5(b) Provide access to services and facilities for all	○	○	○	
5(c) Promote community cohesion	○	○	○	
5(d) Increase access to decent and affordable housing	○	○	○	
5(e) Reduce crime rates and fear of crime	○	○	○	
5(f) Improve conditions and services that engender good health and reduce health inequalities	?	?	?	Traffic to rural proposals could increase ambient noise.
5(g) Increase participation in education and life-long learning	○	○	○	
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	?	?	?	Depends on nature of new development
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	?	?	?	Depends on nature of new development
6(b) Reduce waste	?	?	?	Depends on nature of new development
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	√	√	√	Policy promotes development in town centres which should contribute to their viability and vitality.
<b>Conclusions:</b>				
<ul style="list-style-type: none"> <li>• This policy should have a significant positive impact on promoting sustainable tourism, sustainable location patterns, reduction in greenhouse gas emissions and town centres.</li> <li>• Policy allows uses in town centres, and should assist in encouraging public transport access. However, this cannot be guaranteed, particularly on the edge of settlements and rural areas, and the reality is that most people would drive anyway.</li> <li>• The policy refers to balancing economic benefits against environmental impacts. This implies that potential negative environmental impacts would be weighed against the potential economic benefits. It also implies that environmental impacts which would be unacceptable for projects without economic benefit would be considered acceptable if there was sufficient potential economic benefit. This approach should be treated with caution, as in reality it is not possible to compare say biodiversity or transport impacts with economic benefits, and it does not address the fact that some environmental limits are absolute: for example irreversible impacts on important ecosystems. It is acknowledged that particular elements of the environment are protected by other Development policies in the LDF, such as those on landscape and biodiversity. However, it is considered that this part of the policy should be</li> </ul>				

clarified to make it clearer how the balancing process would operate.

**Uncertainties:**

- Several of the impacts depend on the nature and location of the tourist development.

**Recommendations/Mitigation:**

- Reword the last sentence to make it clear that the environmental and economic benefits will be assessed using an appropriate appraisal process.
- Mitigation of impacts of development is most appropriately addressed by other policies.

**NHDC Response**

Delete final sentence of the policy.

**Economy & Town Centres Policy ETC6: Town and local centres**

We will promote, protect and enhance the retail and service functions of the following centres as shown on the proposals map:

The town centres:

- Hitchin
- Letchworth Garden City
- Baldock
- Royston

The local centres:

*Village centres*

- Ashwell
- Codicote
- Knebworth

*Neighbourhood centres in Hitchin:*

- Grove Road
- Nightingale Road
- Ninesprings

*The appraisal of an earlier version of this policy is shown below.*

**11: Town and local centres**

The retail and service functions of the following centres will be promoted, protected and enhanced:

The Town Centres:

- Principal Town Centres - Hitchin and Letchworth Garden City
- Other Town Centres - Baldock and Royston

The Local Centres:

- Large Village Centres - Codicote and Knebworth
- Ashwell Village Centre

Neighbourhood Centres - Nightingale Road, Walsworth Road, Cambridge Road, Ninesprings, Redhill Road and John Barker Place (Hitchin);

Southfields, Ivel Court (Letchworth Garden City).

Planning permission will be refused for development which would cause unacceptable harm to the vitality or viability of a designated centre.

	What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement
SA Objectives	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable	√	√	√√	The policy directly supports inward



levels of prosperity and economic growth				investment and protection of the local economy through a sequential approach and has a strong focus on urban areas that can sustain growth. A growth in shops and services as a result of investment should lead to increased local employment opportunities. Certain rural centres and settlements (Codicote and Knebworth) have been selected as investment and regeneration priorities which should assist in enhancing and retaining village services.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	?	?	?	Uncertain impact on this when looking at this policy in isolation- this will be dependent upon the extent and nature of development e.g. certain developments, such as operator demand for retail warehouse space in Hitchin and Letchworth Garden City in the future and the need for a foodstore in Hitchin (as identified by the 2004 Town Centre and Retail study) would probably not be suitable in town centre locations. The policy does state that 'suitable' alternative sites will be sought if town centre sites are not viable and would benefit from making reference to preference to the reuse of brownfield land and redundant buildings.
2(b) Provide access to green spaces	?	?	?	Refer to comments made in 2 (a).
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	?	?	?	The policy is supportive of some economic growth and this may increase commuting from external areas (particularly considering the high cost of housing in the locality). More positively, the policy should be considered with other policies such as Core 8 and Core 11 which prioritise centralised locations accessible by a range of transport modes.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	?	?	?	Uncertain impact on this when looking at this policy in isolation- this will be dependent upon the extent and nature of development and with implementation with other Core and Development policies
3(b) Protect and enhance landscapes	?	?	?	As above. The policy is supportive of conserving the vitality of centres/townscapes in that planning permission will be refused if this is compromised. The policy would benefit from being more prescriptive here or to cross reference appropriate Development policies such as R1 and R2.
3(c) Conserve and where appropriate, enhance the historic environment	0.	0.	0.	Whilst the policy is supportive of conserving vitality- it should also place more emphasis upon preserving local distinctiveness, including the historic environment.
3(d) Reduce pollution from any source	?	?	?	Uncertain impact on this when looking at this policy in isolation- this will be dependent upon the extent and nature of development and with implementation with other Core and Development policies

<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	<b>X</b>	<b>O.</b>	<b>?</b>	Development will invariably mean increases in CO <sub>2</sub> . However, transport and access improvements (see policies Core 8 and Core 11 for example) should ensure emissions are reduced. The policy would benefit to more reference (and cross reference to sustainability and design policies) on prioritising sustainable design and construction methods which will also reduce emissions over the short and longer term associated with construction and habitation of buildings.
4(b) Improve the District's ability to adapt to climate change	<b>?</b>	<b>?</b>	<b>?</b>	Whilst EA flood risk maps indicate that only land immediately around rivers and streams are at risk in the District. The risk of flooding will be dependent upon the actual location of development and in implementation with other related policies. There will be potential to mitigate the risk of these areas (e.g. through SUDS).
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	√	√	√	There is potential to address issues of multiple deprivation through enhancements to centres and improving availability and access to employment and key services- and to diversify the social and physical diversity of villages. The policy is supportive of investment and in turn, employment opportunities will be created. This may have a positive impact upon decreasing welfare claimants.
5(b) Provide access to services and facilities for all	√	√	√	See Comments raised above.
5(c) Promote community cohesion	<b>O.</b>	<b>O.</b>	<b>O.</b>	No significant impact.
5(d) Increase access to decent and affordable housing	<b>O.</b>	<b>O.</b>	<b>O.</b>	No significant impact.
5(e) Reduce crime rates and fear of crime	<b>X</b>	<b>X</b>	<b>X</b>	Fear of crime, particularly street crime in town centres has been revealed as a significant issue to local people according to the most recent (2004) crime survey. Further development in towns may exacerbate the problem. There is potential for the policy to emphasise designing out crime in new developments. The policy could reference national guidance on designing developments for crime prevention, such as Safer Places - The Planning System and Crime Prevention (ODPM 2004).
5(f) Improve conditions and services that engender good health and reduce health inequalities	<b>O.</b>	<b>O.</b>	<b>O.</b>	No significant impact.
5(g) Increase participation in education and life-long learning	<b>O.</b>	<b>O.</b>	<b>O.</b>	No significant impact.
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	√	√	√	The policy seeks to promote development in town centres and protect and enhance the character, diversity etc of town and villages centres and when implemented

				with Core 8, should have a beneficial impact here.
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	<b>X</b>	<b>O.</b>	<b>O.</b>	Development will increase waste generation, particularly from construction activities. The impact of this will be reduced when considered with sustainability and design policies. Prioritising development in town centres may encourage recycling and re-use of existing buildings.
6(b) Reduce waste	<b>X</b>	<b>O.</b>	<b>O.</b>	See comments raised above.
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	<b>O.</b>	√	√	The promotion of sustainable urban living should be realised when considering all LDF policies in tandem- such as sustainability and design and transport. Increased development in certain town centres may lead to increases in anti social behaviour.
<p><b>Conclusions</b></p> <p>Overall, the policy is very broad and its main purpose is to provide the guidance for determining investment priorities in town centres and to preserve existing centres. Hence, the policy should not be looked at in isolation in assessing sustainability performance, but with all others contained within the Core Strategy, in particular all other spatial strategies.</p> <p>There are however, a number of assertions that can be made when looking at the sustainability impact of the policy and its justification. It is clear that the policy has the potential to directly promote urban renaissance and social inclusion. The policy gives a steer to investment activity (and in turn, regeneration) and improving the vitality and in turn, distinctiveness of key urban centres. Supplemented by this, there is potential for the policy to promote a range of employment opportunities for local people as improvements to the key centres should assist in stimulating inward investment.</p> <p>The policy is also supportive of protecting the existing character of particular areas in town centres and rural areas will also have a positive impact on the cultural heritage of the area. Prioritising development in town centres may encourage recycling and re-use of existing buildings. Fear of crime, particularly street crime in town centres has been revealed as a significant issue to local people according to the most recent (2004) crime survey. Further development in towns may exacerbate the problem.</p> <p>Neither this nor any other policy specifically promotes mixed use development, which is a key element of promoting vitality in urban areas. This should be addressed either in this policy or probably more appropriately in the Design and Sustainability chapter.</p> <p><b>Uncertainties</b></p> <p>The impacts of design and development may be uncertain as a number of policies require a balance between different objectives, including overall design, density, energy conservation, and crime and anti social behaviour prevention. The impact of density on townscape is also uncertain as it will vary depending on the existing character of the rural or urban area, and the nature and design of the development that takes place.</p> <p>Policies restricting certain types of development within town centres and changes to frontages, plus the demand for space, <b>may</b> force certain activities into outlying areas (for example, operator demand for retail warehouse space Hitchin and Letchworth Garden City in the future and the need for a foodstore in Hitchin (as identified by the 2004 Town Centre and Retail study) would probably not be suitable in town centre locations. The policy does state that 'suitable' alternative sites will be sought if town centre sites are not viable and would benefit from making reference to preference to the reuse of previously developed sites- brownfield land and redundant buildings. Whilst EA flood risk maps indicate that only land immediately around rivers and streams are at risk in the District. The risk of flooding will be dependent upon the actual location of development and in implementation with other related policies. There will be potential to mitigate the risk of these areas (e.g. through SUDS).</p> <p><b>Recommendations/Mitigation:</b></p> <p>No recommended changes.</p> <p>Mitigation of impacts of development is most appropriately addressed by other policies particularly those in sections 2, 3 and 9.</p> <p><b>NHDC Response</b></p> <p>None required</p>				

## Economy & Town Centres Policy ETC7: Additional retail floorspace

The main focus for new additional floorspace will be the four town centres, maintaining the district's current hierarchy and market share between centres. The identified additional need in gross floorspace is as follows:

Comparison goods (e.g. clothes, shoes, furniture, carpets)	18,787m <sup>2</sup>
Convenience (e.g. food, drink, toiletries)	6,560m <sup>2</sup>
Other town centre uses	5,069m <sup>2</sup>
Total	30,416m <sup>2</sup>

The Council will keep under review the likely levels of retail floorspace required for the period 2021 to 2031 through the development of town centre strategies.

Through the master planning process in major new developments the Council will work with landowners and developers, and (for developments on the edge of the district) with adjoining authorities, to identify an appropriate amount additional retail floorspace to be included in these developments:

- North of Stevenage
- West of Stevenage
- East of Luton
- North Baldock.

*The appraisal of an earlier version of this policy is shown below.*

### 13: Additional retail floorspace

The land allocations DPD, will seek to ensure that sufficient sites are allocated to meet the identified need for retail floorspace up to 2016. The identified need is as follows:

Non-Bulky Comparison Goods (e.g. clothes, shoes, books)	17,700 sq. m.
Bulky Comparison Goods (e.g. furniture, carpets, DIY goods )	4,000 sq. m.
Convenience (e.g. food, drink, toiletries)	2,400 sq. m.
Total	24,100 sq. m.

Positive planning powers will be used, where necessary and appropriate, to bring forward sites. Where major retail and leisure developments come forward on non-allocated sites such proposals must demonstrate that they will not harm the bringing forward of the allocated sites.

SA Objectives	What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement
	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	√	√	√	<p>Implementation of this policy should lead to quantifiable economic outcomes. The policy prioritises retail development investment in the most accessible urban centres in accordance with Core Policy 7. This should assist in discouraging 'leakage' in expenditure to outlying District centres (also refer to Core 7)- it will also be possible to measure market share through the monitoring and analysis of the retail expenditure.</p> <p>Promotion of retail development may also have positive economic impacts in terms of tourism.</p> <p>Growth in shops (limited mainly to Hitchin and Letchworth Garden City) should lead to increased local employment opportunities which will be facilitated by improved transport access.</p>

				Whilst the policy does perform well in terms of the economic dimension of sustainable development there are still some uncertainties for example, will the creation of new retail and leisure sites, result in the relocation of some businesses to more attractive, new locations having negative consequences on those areas that are vacated? What measures will be in place to compensate displaced businesses?
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	?	?	?	Development will be focussed in urban centres and it is not expected that development in these areas will take place. However, certain developments, such as operator demand for retail warehouse space in Hitchin and Letchworth Garden City in the future and the need for a foodstore in Hitchin (as identified by the 2004 Town Centre and Retail study) would probably not be suitable in town centre locations. The policy does state that 'suitable' alternative sites will be sought if town centre sites are not viable and would benefit from making reference to preference to the reuse of brownfield land and redundant buildings.
2(b) Provide access to green spaces	0.	0.	0.	No significant impact.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	?	?	?	The focus of development will be in urban centres- which should be well served by sustainable and public transport links. However, it could be argued that more concentrated development in towns could lead to further congestion in an area that already has high reliance on the car.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	0.	0.	0.	Given that the policy prioritises town centre development, it is unlikely to make significant contributions towards this, (even though there is potential to pay some regard to biodiversity in urban areas e.g. selection of planting regimes and species).
3(b) Protect and enhance landscapes	0.	0.	0.	Any design and development should be in keeping with townscapes and local distinctiveness, this should be realised when implemented with Core policy 7 and other LDF policies such as those covering the environment and historic environment.
3(c) Conserve and where appropriate, enhance the historic environment	0.	0.	0.	See comments above.
3(d) Reduce pollution from any source	?	?	?	Uncertain impact on this when looking at this policy in isolation- this will be dependent upon the extent and nature of development, the ability to influence developers and with implementation with other Core and Development policies. It will also be dependent on the effectiveness of transport policies and how far people can be encouraged to use more sustainable modes of transport to reach urban centres.

<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	<b>X</b>	<b>O.</b>	<b>?</b>	Development will invariably mean increases in CO <sub>2</sub> . However, transport and access improvements (see policies Core 8 and Core 11 for example) should ensure emissions are reduced. The policy would benefit from more reference (and cross reference to sustainability and design policies) to prioritising sustainable design and construction methods which will also reduce emissions over the short and longer term associated with construction and habitation of buildings.
4(b) Improve the District's ability to adapt to climate change	<b>?</b>	<b>?</b>	<b>?</b>	Whilst EA flood risk maps indicate that only land immediately around rivers and streams are at risk in the District. The risk of flooding will be dependent upon the actual location of development and in implementation with other related policies. There will be potential to mitigate the risk of these areas (e.g. through SUDS).
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	√	√	√	There is potential to address issues of local employment (an increase in both construction jobs and employment in retail); which should be facilitated by ease of access by public transport as these opportunities are located in town centres.
5(b) Provide access to services and facilities for all	√	√	√	See comments raised above. The policy also promotes investment in retail in accessible locations. As identified in the most recent (June 2004 Town Centre Retail Study) many people (particularly the elderly and immobile) will be socially excluded from certain outlets due to high prices and lack of a car. It goes onto identify that there needs to be consideration of more discount stores.
5(c) Promote community cohesion	<b>O.</b>	<b>O.</b>	<b>O.</b>	No significant impact- this could be promoted through general ongoing public consultation on the LDF policies regarding the range and types of facilities proposed.
5(d) Increase access to decent and affordable housing	<b>O.</b>	<b>O.</b>	<b>O.</b>	No significant impact.
5(e) Reduce crime rates and fear of crime	<b>?</b>	<b>?</b>	<b>?</b>	Uncertain impact- further town centre development will attract more visitors. This may increase the risk of anti social behaviour in these localities (particularly those with developing night economies).
5(f) Improve conditions and services that engender good health and reduce health inequalities	<b>O.</b>	<b>O.</b>	<b>O.</b>	Prioritising development within more readily accessible town centres may promote the use of more sustainable modes of transport (and when realised with transport policies). This may not only have positive implications for air quality (through reduction of car use) but may also encourage healthy lifestyles- people may be able to walk or cycle to shops.
5(g) Increase participation in education and life-long learning	<b>O.</b>	<b>O.</b>	<b>O.</b>	No significant impact- although an increase in construction activity may lead to an improvement in local skills.

5(h) Maintain and improve culture, leisure and recreational activities that are available to all	√	√	√	The policy promotes the development of facilities within accessible urban centres.
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	X	O.	O.	Development (albeit limited) will increase consumption of raw materials and waste generation, particularly from construction activities. Longer-term habitation of buildings will also have an impact on raw material consumption and waste generation. The impact of this will be reduced through encouraging developers to adopt schemes such as 'Considerate Constructor' and to achieve BREEAM excellent ratings in buildings; to incorporate renewables in building design. The Council should also consider policy looking at encouraging high quality design that incorporates sustainability principles and how they can influence developers. The impact of this policy here should be maximised when considered with sustainability and design policies in the LDF.
6(b) Reduce waste	X	O.	O.	See comments raised above.
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	O.	√	√	The promotion of sustainable urban living should be realised when considering all LDF policies in tandem- such as sustainability and design and transport. Access to increased Skills and employment opportunities created by new development in town centres should also impact positively here.
<p><b>Conclusions</b> This policy focuses upon the strategic and spatial development priorities for additional retail floorspace. It should be read in conjunction with Core Policy 11, which dictates the hierarchical settlement principles. Whilst development is limited- implementation of the policy should present investment, employment and leisure opportunities in key, accessible urban areas.</p> <p><b>Uncertainties:</b> Again, as in Core Policy 12 whilst the policy does perform well in terms of the economic dimension of sustainable development there are still some uncertainties for example, will the creation of new retail and leisure sites, result in the relocation of some businesses to more attractive, new locations having negative consequences on those areas that are vacated? What measures will be in place to compensate displaced businesses? Retaining shops within accessible town centres with good sustainable transport links will give an alternative to use of private cars- this will need to be implemented with transport policies if it is to be effective, otherwise concentrating development within town centres may simply increase congestion due to increased user access and worsen air quality impacts. (particularly as there is a high number of households with cars in the area).</p> <p><b>Recommendation/ Mitigation:</b> Mitigation of impacts of development is most appropriately addressed by other policies particularly those in sections 2, 3 and 9.</p> <p><b>NHDC Response</b> None required.</p>				

**Economy & Town Centres Policy ETC8: New retail, leisure and other town centre development**  
The Council will apply a sequential approach to sites for retail, leisure and other town centre uses

(as set out in the NPPF).

Retail uses will be considered in the following order of preference:

1. within the primary or secondary shopping frontages of town centres, on allocated sites within town centres, or in local centres;
2. other parts of the town centres;
3. the edge of centres; and
4. out of centre, only where there are no available, suitable and viable sites which are sequentially preferable.

For leisure and other town centre uses the test will start at number 2 in the list above.

Proposals for main town centre uses in town and local centres must be appropriate to the size, scale, function, catchment area, historic and architectural character of the centre. Proposals of over 500m<sup>2</sup> gross will not generally be suitable in local centres.

Retail, leisure and office proposals on sites outside the town centres not in accordance with the development plan, where 500m<sup>2</sup> and above<sup>7</sup>, must also be assessed against the impact considerations set out in the NPPF before planning permission will be granted.

New build retail proposals will also be expected to contain a mix of uses.

Planning permission will be refused for development which would cause unacceptable harm to the vitality or viability of a designated centre.

Within primary shopping frontages, the preferred location for residential, leisure and other town centre uses will be at upper floor levels.

*The appraisal of an earlier version of this policy is shown below.*

## 12: New retail and leisure development

A sequential approach will be applied to sites for new retail and leisure development (as set out in government policy PPS6). Sites will be considered in the following declining order of preference –

- within the primary <sup>1</sup> or secondary shopping frontages of town centres, on allocated sites within town centres, or in local centres;
- the edge of centres,
- and only where there are no available, suitable and viable sites which are sequentially preferable, out of centre.

Retail and leisure proposals in town and local centres must also be appropriate to the size, scale, function, catchment area, historic and architectural character of the centre. Proposals of over 500m<sup>2</sup> gross will not generally be suitable in local centres. New build retail proposals will also be expected to contain a mix of uses.

In addition, development proposals on sites outside the primary or secondary shopping frontages or on allocated sites, must also meet the following criteria before planning permission will be granted:

- That there is a quantitative and qualitative need for the development that cannot be met in the district's town or local centres;
- That it would not harm the vitality and/or viability of a centre, either in itself or cumulatively with other similar developments

<sup>1</sup> Within primary shopping frontages, the preferred location for leisure development will be at upper floor levels

SA Objectives	What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement
	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	√	√	√√	The policy encourages and prioritises leisure, retail and mixed development investment in the most accessible urban centres, which should assist in discouraging 'leakage' in expenditure to outlying District centres (also refer to Core 7). Growth in shops and services should

<sup>7</sup> North Hertfordshire Town Centre and Retail Study Update (NLP, 2011)



				<p>lead to increased local employment opportunities which will be facilitated by improved transport access.</p> <p>Promotion of retail and leisure development may also have positive economic impacts in terms of tourism through attracting more visitors and shoppers from outside areas.</p> <p>Investment should also have a multiplier effect and encourage further key services and development.</p> <p>Whilst the policy does perform well in terms of the economic dimension of sustainable development there are still some uncertainties for example, will the creation of new retail and leisure sites, result in the relocation of some businesses to more attractive, new locations having negative consequences on those areas that are vacated? What measures will be in place to compensate displaced businesses?</p>
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	√	√	?	<p>The policy prioritises development within existing centres.</p> <p>However, certain developments, such as operator demand for retail warehouse space in Hitchin and Letchworth Garden City in the future and the need for a foodstore in Hitchin (as identified by the 2004 Town Centre and Retail study) would probably not be suitable in town centre locations. The policy does state that 'suitable' alternative sites will be sought if town centre sites are not viable and would benefit from making reference to preference to the reuse of brownfield land and redundant buildings.</p>
2(b) Provide access to green spaces	○	○	○	No significant impact.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	?	?	?	<p>The policy is supportive of development in accessible areas by a range of transport means- this could be improved through emphasising access by sustainable modes of transport. However, the positive impact of this policy will be maximised through implementation over the long-term with the Transport policies contained within the LDF.</p>
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	○	○	○	<p>Given that the policy prioritises town centre development, it is unlikely to make significant contributions towards this, (even though there is potential to pay some regard to biodiversity in urban areas e.g. selection of planting regimes and species).</p> <p>The policy should also be more prescriptive for sites outside the allocated areas in terms of avoidance of Greenfield sites/certain landscapes.</p> <p>Environmental Impact Assessment (EIA) for certain larger developments should, however identify any significant key issues relating to biodiversity and protection of landscape.</p>

3(b) Protect and enhance landscapes	?	?	?	As above. The policy is supportive of conserving the vitality of centres/townscapes in that planning permission will be refused if this is compromised. The policy would benefit from being more prescriptive here or to cross reference appropriate Development policies such as R1 and R2.
3(c) Conserve and where appropriate, enhance the historic environment	0.	0.	0.	Whilst the policy is supportive of conserving vitality- it is not explicit about the historic environment and should also place more emphasis upon preserving local distinctiveness, including the historic environment.
3(d) Reduce pollution from any source	?	?	?	Uncertain impact on this when looking at this policy in isolation- this will be dependent upon the extent and nature of development, the ability to influence developers and with implementation with other Core and Development policies Concentrating development in town centres may also increase noise.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	X	0.	?	Development will invariably mean increases in CO <sub>2</sub> . However, transport and access improvements (see policies Core 8 and Core 11 for example) should ensure emissions are reduced. The policy would benefit from more reference (and cross reference to sustainability and design policies) to prioritising sustainable design and construction methods which will also reduce emissions over the short and longer term associated with construction and habitation of buildings.
4(b) Improve the District's ability to adapt to climate change	?	?	?	Whilst EA flood risk maps indicate that only land immediately around rivers and streams are at risk in the District. The risk of flooding will be dependent upon the actual location of development and in implementation with other related policies. There will be potential to mitigate the risk of these areas (e.g. through SUDS).
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	√	√	√	There is potential to address issues of local employment (an increase in both construction jobs and employment in retail and leisure); which should be facilitated by ease of access by public transport where these opportunities are located in town centres.
5(b) Provide access to services and facilities for all	√	√	√	See comments raised above. The policy also promotes investment in leisure and retail in accessible locations. However, there may be an issue of access to town centre services for those without vehicles such as elderly and young people living in the villages and some neighbourhood areas of the towns. As identified in the most recent (June 2004 Town Centre Retail Study) many people will be socially excluded from certain outlets due to high prices and lack of a car. It goes onto identify that there needs to be consideration of more discount stores.

5(c) Promote community cohesion	O.	O.	O.	No significant impact- this could be promoted through public consultation on the range of facilities proposed.
5(d) Increase access to decent and affordable housing	O.	O.	O.	No significant impact.
5(e) Reduce crime rates and fear of crime	X/?	X/?	X/?	Fear of crime, particularly street crime in town centres has been revealed as a significant issue to local people according to the most recent (2004) crime survey. There is potential for the policy to emphasise designing out crime in new developments.
5(f) Improve conditions and services that engender good health and reduce health inequalities	?	?	?	This will be dependent upon the type and location of leisure facilities provided. Prioritising development within more readily accessible town centres may promote the use of more sustainable modes of transport ( <b>when realised with transport policies</b> ). This may not only have positive implications for air quality (through reduction of car use) but may also encourage healthy lifestyles- people may be able to walk or cycle to facilities.
5(g) Increase participation in education and life-long learning	O.	O.	O.	No significant impact- although an increase in construction activity may lead to an improvement in local skills.
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	√	√	√	The policy deals directly with promoting the development of leisure facilities within accessible urban centres.
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	X	O.	O.	Development will increase consumption of raw materials and waste generation, particularly from construction activities. Longer-term habitation of buildings will also have an impact on raw material consumption- particularly water supply, which will be unmet for future developments if the current situation persists; and waste generation. The impact of this will be reduced through encouraging developers to adopt schemes such as 'Considerate Constructor' and to achieve BREEAM excellent ratings in buildings; to incorporate renewables in building design. The policy should have some regard to encouraging high quality design that incorporates sustainability principles. The impact of this policy here should be maximised when considered with sustainability and design policies in the LDF.
6(b) Reduce waste	X	O.	O.	See comments raised above.
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	O.	√	√	The promotion of sustainable urban living should be realised when considering all LDF policies in tandem- such as sustainability and design and transport. Access to increased Skills and employment opportunities created by new development in town centres should also impact positively here.

**Conclusions:**

The policy is supportive in terms of improving the vitality of key centres and meeting local needs and sustaining communities. Implementation of this policy should stimulate a range of employment, skills and recreational opportunities for local people through improved development, facilitated by better public transport provision to town centres. Provision of, and better access to retail and leisure services and employment may also assist in improving disparities in income, welfare and health.

However, there may be an issue of access to town centre services for those without vehicles such as elderly and young people living in the villages and some neighbourhood areas of the towns. As identified in the most recent (June 2004 Town Centre Retail Study) many people will be socially excluded from certain outlets due to high prices and lack of a car. It goes onto identify that there needs to be consideration of more discount stores. Policies restricting certain types of development within town centres and changes to frontages, plus the demand for space, may force certain activities into outlying areas (for example, operator demand for retail warehouse space Hitchin and Letchworth Garden City in the future and the need for a foodstore in Hitchin (as identified by the 2004 Town Centre and Retail study) would probably not be suitable in town centre locations. This would impact on their accessibility and possibly on the use of greenfield land.

**Uncertainties:**

Whilst the policy does perform well in terms of the economic dimension of sustainable development there are still some uncertainties for example, will the creation of new retail and leisure sites, result in the relocation of some businesses to more attractive, new locations having negative consequences on those areas that are vacated? What measures will be in place to compensate displaced businesses?

It is uncertain from looking at this policy in isolation how adverse environmental impacts of development will be minimised, for example, avoidance of development within flood risks areas, avoid impacts on nature conservation, landscape, archaeology and heritage; reduction of resource consumption; and avoid placing pressure on existing utilities and associated infrastructure.

Retaining shops within accessible town centres with good sustainable transport links will give an alternative to the use of private cars- this will need to be implemented with transport policies if it is to be effective, otherwise concentrating development within town centres may simply increase congestion due to increased user access and worsen air quality impacts.

**Recommendations/Mitigation:**

For out of centre locations, the policy should prioritise the use of brownfield land, and redundant buildings and require that applicants demonstrate that this will be in locations genuinely accessible by sustainable modes of transport..

Mitigation of other impacts of development is most appropriately addressed by other policies particularly those in sections 2, 3 and 9.

**NHDC Response**

Amend policy to prioritise the use of brownfield land.

Amend policy to require proposals outside of the town centres to be accessible to pedestrians, cyclists, and those travelling by passenger transport.

## Economy & Town Centres Policy ETC9: Primary and Secondary Shopping Frontages

The Council will support a mixture of uses in our town centres to promote vitality and viability and meet the needs of all users of the town centres. Different controls will apply in primary and secondary shopping areas to promote an appropriate balance.

### Primary Shopping Frontages

In Hitchin, Letchworth Garden City and Royston town centres designated primary shopping frontages are shown on the proposals map. There will be a strong presumption against the loss of ground floor retail units within the primary shopping frontages. Within these areas, ground floor units should remain predominately in shop (A1 use class) use, unless, exceptionally a restaurant (A3) or similar use is demonstrated as being acceptable, by being essential to promote the vitality and viability of that part of the town centre. Any proposal will need to show that it does not undermine the retail function of the centre and will not disrupt the shopping pattern and will attract people to the centre, enhancing the centre's vitality and viability.

### Secondary Shopping Frontages

In Hitchin, Letchworth Garden City, Baldock and Royston town centres designated secondary shopping frontages are shown on the proposals map. Development proposals for retail and restaurant / drinking places (A1, A3, A4) will be acceptable in secondary shopping frontage. Other uses will only be permitted if they do not undermine the retail function of the centre and where the proposal will attract people to the centre, enhancing the centre's vitality and viability.

In secondary frontages, where planning permission is required, acceptable alternative uses at ground floor level will be confined to A2 (financial and professional services), A5 (takeaways), D1 (non-residential institutions), D2 (assembly and leisure).

*The appraisal of an earlier version of this policy is shown below.*

### **R1: Primary and secondary shopping frontages**

#### Primary Shopping Frontages

In Hitchin, Letchworth Garden City and Royston town centres, primary shopping frontages have been designated on the proposals map. There will be a strong presumption against the loss of ground floor retail units within the primary shopping frontages. Within these areas, ground floor units should remain predominately in shop (A1) use, unless, exceptionally, occasional other uses are demonstrated as being acceptable, by being essential to promote the vitality and viability of that part of the town centre, and which complies with the following criterion below.

In such exceptional circumstances, applications involving the loss of a shop (A1) in a primary shopping frontage will only be permitted where:

The proposal unit has a minimum of two shops (A1) on each side, and no more than 20% of the total frontage length of these five units (the application unit and two each side) is in non-shop (A1) use. Where the proposal unit is within the last two units in the defined primary frontage, the five units to be taken into account shall be the last five units in the frontage.

Where applications are for food and drink uses (A3/A4/A5) then they must also comply with policy R4 on eating, drinking and entertainment uses.

#### Secondary Shopping Frontages

In Hitchin, Letchworth Garden City, Baldock and Royston town centres, secondary shopping frontages have been designated on the proposals map. Within the secondary frontages, the loss of shop (A1) uses at ground floor level will be resisted where this would undermine the retail function of the centre. Planning applications involving the loss of a shop (A1) unit in a secondary shopping frontage will only be permitted if it does not undermine the retail function of the centre and where:

The proposal does not result in more than two non-A1 units within the application unit and two each side, and no more than 40% of the total frontage length of these five units (the application unit and two each side) is in non-shop (A1) use. Where the proposal unit is within the last two units in the defined secondary frontage, the five units to be taken into account shall be the last five units in the frontage.

Where the above criterion has been met, acceptable alternative uses will be confined to A2 (financial and professional services, A3 (restaurants and cafes), and A4 (drinking establishments), A5 (takeaways), D1 (non-residential institutions), D2 (assembly and leisure).

Where proposals are for food and drink uses (A3/A4/A5) then they must also comply with policy R4 on eating, drinking and entertainment uses.

	<b>What is the predicted effect on</b>	<b>Justification for assessment and recommendations for</b>
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SA Objectives	each SA objective?			mitigation/improvement
	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	√	√	√	<p>This policy will contribute towards protecting the vitality and culture of the town centre.</p> <p>The policy promotes sustainable economic growth and investment in key centres through restricting the over-concentration of non A1 uses, thus avoiding 'dead frontages'.</p> <p>In the long term the protection of the shopping function of the town centres should help to achieve sustained economic growth. However, this may have a number of short-term disadvantages in terms of diversity. Restricting certain development may reduce the opportunities for other business types and community facilities.</p>
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	○.	○.	○.	No significant impact.
2(b) Provide access to green spaces	○.	○.	○.	No significant impact.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	○.	○.	○.	Retaining shops within accessible town centres with good sustainable transport links will give an alternative to use of private cars- this will need to be implemented with transport policies if it is to be effective, otherwise concentrating development within town centres may simply increase congestion and worsen air quality impacts.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	○.	○.	○.	No significant impact.
3(b) Protect and enhance landscapes	√	√	√	In the main, these shopping frontages will be retained for retail use and should not detract from the local distinctiveness of the townscape and in accordance with the Core policies and those elsewhere in the LDF covering the environment (including historic).
3(c) Conserve and where appropriate, enhance the historic environment	√	√	√	As above.
3(d) Reduce pollution from any source	○.	○.	○.	<p>No significant impact- however, as the building uses/intensity of activity is likely to be largely unchanged, it is assumed pollution is not likely to be increased (for example through increased energy use; through significant refurbishment and construction).</p> <p>In terms of air pollution, the longer term benefits of implementing LDF transport policies also need to be observed here:</p>

				otherwise concentrating development within town centres may simply increase congestion and worsen air quality impacts.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	<b>O.</b>	<b>O.</b>	<b>?</b>	See comments raised above- this will be dependent on the level of new development/refurbishment- which is not likely to be intensive.
4(b) Improve the District's ability to adapt to climate change	<b>O.</b>	<b>O.</b>	<b>O.</b>	No significant impact.
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	√	√	√	The policy may assist in securing jobs in retail in accessible urban centres and providing further jobs in retail.
5(b) Provide access to services and facilities for all	√	√	√	The policy promotes the retention of shops in accessible urban areas
5(c) Promote community cohesion	<b>O.</b>	<b>O.</b>	<b>O.</b>	No significant impact.
5(d) Increase access to decent and affordable housing	<b>O.</b>	<b>O.</b>	<b>O.</b>	No significant impact.
5(e) Reduce crime rates and fear of crime	<b>?</b>	<b>?</b>	<b>?</b>	There may be a correlation between anti social behaviour with further development in towns, (particularly food and drink outlets- where permitted; and the development of night economies) which may increase crime rates and fear of crime.
5(f) Improve conditions and services that engender good health and reduce health inequalities	<b>O.</b>	<b>O.</b>	<b>O.</b>	
5(g) Increase participation in education and life-long learning	<b>O.</b>	<b>O.</b>	<b>O.</b>	No significant impact.
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	√	√	√	The policy promotes retail as a leisure activity (in conjunction with town centre core policies) within highly accessible locations.
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	√	<b>O.</b>	<b>O.</b>	Maintaining primary retail functions of town centres and buildings will invariably reduce raw material consumption and waste associated with new development or more intensive refurbishment of premises for other uses.
6(b) Reduce waste	√	<b>O.</b>	<b>O.</b>	See comments raised above.
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	<b>O.</b>	<b>O.</b>	<b>O.</b>	No significant impact. The focus of the policy is in maintaining the primary retail function of town centres and in isolation does not take a holistic view of the urban area.
<b>Conclusions</b>				
<p>The main purpose of the policy is economic and it performs significantly well in a number of areas. Its key role is to protect the primary retail function of towns and to promote balanced and sustainable economic growth in order to maintain and enhance the vibrancy and vitality of town centres. Implementation of the policy should also assist in maintaining local distinctiveness, with primary and secondary frontages being retained for retail use only.</p> <p>The policy may have a significantly positive impact in terms of social inclusion and access to</p>				

employment. Jobs in retail will be retained and new ones created, facilitated by good transport links in town centres.

There could potentially be some positive environmental effects associated with retaining and enhancing the primary retail functions of town centres and existing buildings- this should invariably reduce raw material consumption and waste associated with new development in new locations or more intensive refurbishment of existing premises for other uses.

There may be a correlation between anti social behaviour with further development in towns, (particularly food and drink outlets- where permitted; and the development of night economies) which may increase crime rates and fear of crime.

**Uncertainties:**

Limiting other businesses may have a number of short-term disadvantages in terms of diversity. Restricting certain development may reduce the opportunities for other business types and community facilities.

Retaining shops within accessible town centres with good sustainable transport links will give an alternative to use of private cars- this will need to be implemented with transport policies if it is to be effective, otherwise concentrating development within town centres may simply increase congestion and worsen air quality impacts.

There may be a correlation between anti social behaviour with further development in towns. This will be linked mainly to food and drink outlets and the development of night economies.

**Recommendations/Mitigation:**

No changes recommended.

**NHDC Response**

None required

**Economy & Town Centres Policy ETC10: Local centres**

In the local centres the Council supports the provision of shopping and service facilities for local people. The Council will only permit the loss of a shop (A1 use class) to use classes A2, A3, A4, A5, D1 or D2 in a local centre where:

1. the proposed use would add to the vitality and viability of the centre; and
2. it would not seriously diminish the provision of local shopping facilities.

Where the unit is vacant, and the proposal does not comply with the criteria above the Council will only permit the loss if it can be demonstrated that the unit has remained vacant for a year or more, and documentary evidence has been provided that all reasonable attempts to sell or let the premises for similar uses in that period have failed.

The Council will only grant development proposals for a change of use from use classes A1, A2, A3, A4, A5, D1 or D2 at ground floor level, to residential or other use not listed above, in exceptional circumstances, and where it can be demonstrated through documentary evidence that the proposal is consistent with the principles of sustainable development.

*This policy has been formed by the amalgamation of two earlier policies. Appraisals of these policies are shown below.*

**R2: Codicote and Knebworth large village centres**

In the large village centres of Codicote and Knebworth, the provision of shopping and service facilities for local people is supported. The loss of shop (A1) uses at ground floor level will be resisted where this would undermine the retail function of the centre.

The loss of a shop (A1) unit in a large village centre will only be permitted where:

- It would not harm the vitality and viability of the centre; and
- It would not lead to an over concentration of non-shop (A1) uses; and
- The proposed use is within the A2, A3, A4, A5, D1 or D2 uses classes.

SA Objectives	What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement
	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and	√	√	√	The policy recognises the importance of preserving and enhancing the existing



economic growth				functions of the village centres. In particular, the policy will enhance retail and key services and to some degree, diversify the local economies and in turn, protect existing employment and create new employment opportunities for local people.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	<b>0.</b>	<b>0.</b>	<b>0.</b>	It is unlikely that this will have a detrimental impact in that the focus of this policy is upon village centres.
2(b) Provide access to green spaces	<b>0.</b>	<b>0.</b>	<b>0.</b>	No significant impact.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√	√	√	This policy has the potential to meet very local needs, locally, thus reducing the need to travel longer distances and therefore use of cars. In terms of employment (and the potential generation of new employment under this policy) in Village centres, higher house prices may mean workers from outlying areas having to travel by car (village centres are less likely to be well served by public transport compared with towns).
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	<b>0.</b>	<b>0.</b>	<b>0.</b>	No significant impact.
3(b) Protect and enhance landscapes	?	?	?	Any new development should be in keeping with the local distinctiveness of the village centre, which should be achieved when implemented with policies covering the environment.
3(c) Conserve and where appropriate, enhance the historic environment	?	?	?	See comments raised above.
3(d) Reduce pollution from any source	<b>0.</b>	<b>0.</b>	<b>0.</b>	It is not expected that there will be intensive new development on a large scale, (in accordance with 3 b&c) and therefore not anticipated that pollution from construction; habitation; motor vehicles; noise; run-off is likely to increase. There is potential for the Council to encourage local businesses to use resources more efficiently.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	√	√	√	See comments raised above. Provision of key services to meet local needs may also reduce the need to travel by car. Hence, the mix of services available needs to meet the broad needs of the local communities.
4(b) Improve the District's ability to adapt to climate change	<b>0.</b>	<b>0.</b>	<b>0.</b>	See comments above and raised in 3d.
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	√	√	√	The policy could assist in providing employment for young people in these centres.
5(b) Provide access to services and facilities for all	√	√	√	The policy has the potential to address the problem of recreational and service provision, particularly to young people, in

				villages..
5(c) Promote community cohesion	√	√	√	Retaining local services will help promote community identity.
5(d) Increase access to decent and affordable housing	0.	0.	0.	
5(e) Reduce crime rates and fear of crime	0.	0.	0.	
5(f) Improve conditions and services that engender good health and reduce health inequalities	0.	0.	0.	
5(g) Increase participation in education and life-long learning	0.	0.	0.	
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	√	√	√	The policy has the potential to improve provision of these services as access to these within more rural areas and villages is currently poor.
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	0.	0.	0.	
6(b) Reduce waste	0.	0.	0.	
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	0.	0.	0.	
<b>Conclusions</b>				
<p>Overall, the policy seeks to protect and enhance key village services for the communities of the larger villages within the area. In particular, the policy will enhance retail and key services and to some degree, diversify the local economies and in turn, protect existing employment and create new employment opportunities for local people.</p> <p>The policy does not include any mechanism for addressing clear community needs to justify changes of use.</p>				
<b>Uncertainties:</b>				
None significant				
<b>Recommendations/Mitigation:</b>				
<p>When considering any change of use from an occupied shop, the policy should take into consideration the clear community need for facilities. (For example, as part of community consultation and a facilities audit).</p> <p>Mitigation of impacts of food, drinking and entertainment uses will be addressed by R4.</p>				
<b>NHDC Response</b>				
Amend the policy to include in the final criterion, '...and meets a key community need', as was recommended for policy R3.				
<b>R3: Neighbourhood centres and Ashwell village centre</b>				
<p>The loss of an occupied shop (A1) unit will not be permitted in a neighbourhood or small village centre unless:</p> <ul style="list-style-type: none"> <li>• The centre would remain predominantly in shop (A1) use; and</li> <li>• The proposed use would add to the vitality and viability of the centre; and</li> <li>• It would not seriously diminish the provision of local shopping facilities.</li> </ul> <p>Where the unit is vacant, and the proposal does not comply with criteria i-iii, the loss will only be permitted if it can be demonstrated that the unit has remained vacant for a year or more, and documentary evidence has been provided that all reasonable attempts to sell or let the premises for similar uses in that period have failed.</p> <p>Proposals for a change of use from A1/2/3/4/5, D1 or D2, to another use not listed, will only be granted in exceptional circumstances where it can be demonstrated that the proposal meets a particular local community need.</p>				
	<b>What is the predicted effect on each SA objective?</b>		<b>Justification for assessment and recommendations for mitigation/improvement</b>	

<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	√	√	√	The policy proposes to retain the current mix of services within these centres, and to prevent any change of use- particularly that which would be more appropriate within larger urban centres.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	○.	○.	○.	No significant impact
2(b) Provide access to green spaces	○.	○.	○.	No significant impact
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√	√	√	This policy has the potential to meet very local needs, locally, thus reducing the need to travel longer distances and therefore use of cars.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	○.	○.	○.	No significant impact.
3(b) Protect and enhance landscapes	√	√	√	The policy is concerned with retention of current services and preventing changes of use, which should have a positive impact in retaining the local distinctiveness of these areas.
3(c) Conserve and where appropriate, enhance the historic environment	√	√	√	See comments raised above.
3(d) Reduce pollution from any source	○.	○.	○.	
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	√	√	√	Provision of key services to meet local needs may also reduce the need to travel by car. Hence, the mix of services available needs to meet the broad needs of the local communities.
4(b) Improve the District's ability to adapt to climate change	○.	○.	○.	
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	○.	○.	○.	
5(b) Provide access to services and facilities for all	√	√	√	Will help retain access to local services.
5(c) Promote community cohesion	√	√	√	Will help retain access to local services, and therefore contribute to community cohesions..
5(d) Increase access to decent and affordable housing	○.	○.	○.	
5(e) Reduce crime rates and fear of crime	○.	○.	○.	
5(f) Improve conditions and services that engender good health and reduce	○.	○.	○.	

health inequalities				
5(g) Increase participation in education and life-long learning	O.	O.	O.	
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	√	√	√	The policy has the potential to improve provision of these services as access to these within more rural areas and villages is currently poor.
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	O.	O.	O.	
6(b) Reduce waste	O.	O.	O.	
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	O.	O.	O.	No significant impact.
<p><b>Conclusions</b>  The policy proposes to retain the current mix of services within these centres, and to prevent any change of use- particularly that which would be more appropriate within larger urban centres, which will help preserve local distinctiveness and vitality.  The policy does not include any mechanism for addressing clear community needs to justify changes of use.</p> <p><b>Uncertainties:</b>  None significant.</p> <p><b>Recommendations/Mitigation:</b>  When considering any change of use from an occupied shop, the policy should take into consideration the clear community need for facilities. (For example, as part of community consultation and a facilities audit). Additional policy wording could be added as numbered point iv...."the proposed use meets a key community need".</p> <p><b>NHDC Response</b>  Amend policy to include new criterion iv 'the proposed use meets a key community need'.</p>				

<p><b>Economy &amp; Town Centres Policy ETC11: Scattered local shops, services and facilities in towns and villages</b></p> <p>The Council will support small scale proposals providing new shops and services within existing settlements which serve a local need.</p> <p>Development proposals which result in the loss of an individual shop, service or facility outside the town and local centres will not be permitted unless:</p> <ol style="list-style-type: none"> <li>1. There is another shop, service or facility of a similar use available for customers within a convenient walking distance; and</li> <li>2. the proposed new use would complement the function and character of the area.</li> </ol> <p>In the absence of such an alternative facility, the Council will only permit the loss if it can be demonstrated that the unit has remained vacant for a year or more, and documentary evidence has been provided that all reasonable attempts to sell or let the premises for similar uses in that period have failed.</p> <p><i>The appraisal of an earlier version of this policy is shown below.</i></p> <p><b>S7: Scattered local shops, services and facilities</b></p> <p>The loss of an individual shop, service or facility, outside the identified centres, will not be permitted unless:</p> <p>There is another shop, service or facility of a similar use available for customers within a convenient walking distance; and the proposed new use would complement the function and character of the area.</p> <p>In the absence of such an alternative facility, the Council will only permit the loss if it can be demonstrated that the unit has remained vacant for a year or more, and documentary evidence has been provided that all reasonable attempts to sell or let the premises for similar uses in</p>
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that period have failed.				
	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	?	?	?	Policy helps maintain shops in rural areas but does act against market forces which may promote the change in shops to other uses or the move towards larger retail units in more centralised locations.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	0	0	0	No significant impact
2(b) Provide access to green spaces	0	0	0	No significant impact
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√	√	√	By maintaining a network of local shops fewer people are likely to have to use private cars to travel to larger retail centres
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	0	0	0	No significant impact
3(b) Protect and enhance landscapes	0	0	0	No significant impact
3(c) Conserve and where appropriate, enhance the historic environment	0	0	0	No significant impact
3(d) Reduce pollution from any source	√	√	√	Policy will help reduce road transport
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	√	√	√	Policy will help reduce road transport by providing services more locally.
4(b) Improve the District's ability to adapt to climate change	0	0	0	No significant impact
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	0	0	0	No significant impact
5(b) Provide access to services and facilities for all	√	√	√	Focus of policy is to provide easily accessible services across North Herts
5(c) Promote community cohesion	√	√	√	By maintaining local shops is likely to support more cohesive communities
5(d) Increase access to decent and affordable housing	0	0	0	No significant impact
5(e) Reduce crime rates and fear of crime	0	0	0	No significant impact
5(f) Improve conditions and services that engender good health and reduce health inequalities	0	0	0	No significant impact
5(g) Increase participation in education and life-long learning	0	0	0	No significant impact
5(h) Maintain and improve culture, leisure and recreational activities that	0	0	0	No significant impact

are available to all				
RESOURCE USE AND WASTE				
6(a) Use natural resources efficiently; reuse, use recycled where possible	0	0	0	No significant impact
6(b) Reduce waste	0	0	0	No significant impact
TOWN CENTRES				
7 Promote sustainable urban living	0	0	0	Policy only concerned with rural shops
<p><b>Conclusions</b> The maintenance of rural shops and other facilities is an important element of the overall sustainability of rural communities, and the Policy is correct in seeking to protect such facilities. It does permit a degree of flexibility enabling a change of use where it appears that no retail use can be found for an unoccupied shop.</p> <p><b>Uncertainties</b> No significant uncertainties identified</p> <p><b>Recommendations/Mitigation</b> None identified</p> <p><b>NHDC Response</b> Noted. The policy title has been amended to make clear that this policy applies in both rural and urban areas.</p>				

## Countryside and greenbelt

<p><b>Countryside and Green Belt Policy CGB1: Green Belt</b></p> <p>Development proposals will only be allowed in the Green Belt which the National Planning Policy Framework defines as appropriate.</p> <p>Green belt is reviewed at the locations referred to in Policy HDS1 Housing Targets, and in defining boundaries for villages referred to in Policy HDS 2 Settlement hierarchy, which fall within the Green Belt and did not previously have boundaries defined.</p> <p>The Green Belt review shows that new areas of green belt should be provided. The Green Belt will be extended in general terms to cover the area bounded by the Metropolitan Green Belt to the east, the Luton Green Belt to the west and the A505 Offley bypass to the north to ensure longevity of Green Belt protection to Hitchin and that there is no overall reduction in the amount of Green Belt in the district.</p>
<p><b>Countryside and Green Belt Policy CGB2: Rural Areas beyond the Green Belt.</b></p> <p>In Rural Areas beyond the Green Belt, the Council will maintain the existing countryside and villages, and their character. Except in those settlements identified in Policy HDS2 'Settlement Hierarchy', a development proposal will normally only be allowed if:</p> <ol style="list-style-type: none"> <li>1. it is strictly necessary for the needs of agriculture, forestry or a proven local need for community services;</li> <li>2. it would meet an identified rural housing need, in compliance with policy CGB3 'Exception Sites in the Rural Area';</li> <li>3. it would provide appropriate facilities for outdoor sport, outdoor recreation and cemeteries.</li> </ol>
<p><i>These two policies were created from one earlier version. An appraisal of the earlier version of which made up these policies is shown below.</i></p>
<p><b>6: Rural area and green belt</b></p> <p>In the rural area outside the towns and identified villages, development will only be allowed which is acceptable in green belts or rural areas as discussed in PPG2 and PPS7 (or their successors) depending whether the site is in the green belt or not.</p> <p>Where green belt land reviews take place, compensatory green belt will be provided. In</p>

particular, the green belt will be extended to cover the area bounded by the Metropolitan Green Belt to the south, the Luton Green Belt to the west and the A505 Offley bypass to the north.				
	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	√	√	√	Permits some limited development on Greenbelt in line with national planning policy. This development should enhance the local economy by increasing the local population
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	X	XX	XX	This option will still involve some development on Greenfield and greenbelt sites in line with PPG2 and PPS7. The Housing Capacity Study shows that on the Best Fit scenario, around 4120 dwelling units could be provided within the four towns and 14 villages. Including an additional 2264 for planning permissions since 2001, this leaves a total of around 9,400 dwellings to be located on greenfield sites. However it does offer the opportunity to address remediate existing contaminated land sites in the four towns.
2(b) Provide access to green spaces	?	?	?	The Housing Capacity study only includes sites that avoid development on open spaces. However, additional greenfield development around villages could limit access, unless open spaces are provided within the development.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√	√	√	By allowing some development in and around existing settlements the policy should help support local services and reduce the need to travel
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	X	X	X	Policy will involve limited greenfield development around towns and villages. The BAP indicates that these areas include "areas high in biodiversity", key areas for farming wildlife and key grassland habitats. Protection needs to be provided for these areas but this is more appropriately addressed through the Environment Policies of this Plan
3(b) Protect and enhance landscapes	?	?	?	Impact dependent on the location of development although other Plan policies do protect landscape. Some of the areas around towns and villages are in or close to the AONB.
3(c) Conserve and where appropriate, enhance the historic environment	?	?	?	Impact dependent on the location of development. Other policies seek to protect the historic environment
3(d) Reduce pollution from any source	X	X	X	New development will lead to increased light, air and noise pollution from traffic. Pollution of groundwater is also an issue as the District is on a major chalk aquifer with high groundwater vulnerability.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	X	X	X	Increasing the total number of homes is likely to lead to an increase in GHG

				emissions, even if new homes are built to high energy standards. Development is also likely to result in increased car journeys, and add to greenhouse gas emissions although by concentrating development largely around existing settlements this can be minimised.
4(b) Improve the District's ability to adapt to climate change	?	?	?	Partly depends on design and location of developments. However, the District has amongst the lowest rainfall (125mm/y) in the UK, and the new developments will increase the pressure on the water supply infrastructure.
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	?	?	?	Depends on how the issue of affordable housing is addressed and how new housing helps contribute to the regeneration of Hitchin and Letchworth. Core policy 5 deal with the issue of affordability of housing
5(b) Provide access to services and facilities for all	√	√	√	Development should help support and enhance services, especially in rural villages
5(c) Promote community cohesion	√	√	√	By concentrating development in and around existing settlements should help promote the viability of these towns and villages
5(d) Increase access to decent and affordable housing	√	√√	√√	The new housing provided should lead to an increase in affordability (or at least slower price rises). To ensure that affordability is maximised then plan should set a requirement for a significant percentage of affordable homes. This is addressed by other plan policies
5(e) Reduce crime rates and fear of crime	?	?	?	Depends on design of new developments. Other plan policies address this issue
5(f) Improve conditions and services that engender good health and reduce health inequalities	?	?	?	Provision of housing in some areas may help support local health services and reduce centralisation. May also improve the living conditions of many people as more affordable housing could be available. As a negative impact the policy is likely to increase traffic levels.
5(g) Increase participation in education and life-long learning	0	0	0	No significant impact
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	0	0	0	No significant impact
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	X	XX	XX	New housing will significantly increase water use in the District, and put significant pressure on water infrastructure.
6(b) Reduce waste	0	0	0	No significant impact
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	√	√	√	By increasing population around towns and villages should support services and enhance the overall attractiveness of individual settlements
<b>Conclusions</b>				



The policy provides further detail as to where new development will be permitted in rural areas. It allows Greenfield development which may result in some environmental damage. However, given the number of new homes required in the area, and the fact that the general target for new homes is outside the control of the Council, it is difficult to see how this could be avoided.

**Uncertainties**

No significant uncertainties identified

**Recommendations/Mitigation**

None identified

**NHDC Response**

Noted.

**Countryside and Green Belt Policy CGB3: Exception sites in the rural area**

Where the Council recognises proven local needs for affordable housing or community facilities which cannot be met within an identified settlement but would ordinarily be unacceptable in a rural area that development may be provided in or adjoining the Category A, B and C villages listed in Policy HDS2, Settlement hierarchy.

The Council will use legal agreements to ensure that such development is used to meet local needs in perpetuity.

The Council will also consider limited market housing to cross-subsidise affordable housing exception sites where it can be demonstrated that the level of market housing proposed is necessary in order to make the required affordable housing deliverable.

*An earlier version of this policy was appraised. The appraisal is shown below.*

**7: Exception sites in the rural area**

As an exception to normal policies of restraint in the rural area and green belt, where the Council recognises local needs for development which cannot be met within an identified settlement but would ordinarily be unacceptable in a rural area, that development may be provided:  
 Adjoining the settlements listed in policy Core 3 where no suitable land is available within the defined boundaries; or  
 In or adjoining any other settlement where the need is specific to that settlement.  
 Conditions and/or legal agreements will be used to ensure that the development is used to meet those local needs in perpetuity.

SA Objectives	What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement
	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	√	√	√	Permits some limited development on Greenbelt that helps meet specific need for affordable housing and community services
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	<b>X</b>	<b>X</b>	<b>X</b>	This option will still involve some development on Greenfield and greenbelt sites but only where there is a pressing local need for affordable housing of facilities.
2(b) Provide access to green spaces	<b>0</b>	<b>0</b>	<b>0</b>	No significant impact
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√	√	√	By allowing some development in and around existing settlements the policy should help support local services and reduce the need to travel
<b>ENVIRONMENTAL PROTECTION</b>				

3(a) Protect and enhance biodiversity	X	X	X	Policy will involve limited greenfield development around towns and villages. The BAP indicates that these areas include "areas high in biodiversity", key areas for farming wildlife and key grassland habitats.
3(b) Protect and enhance landscapes	?	?	?	Impact dependent on the location of development although other Plan policies do protect landscape. Some of the areas around towns and villages are in or close to the AONB.
3(c) Conserve and where appropriate, enhance the historic environment	0	0	0	No significant impact
3(d) Reduce pollution from any source	X	X	X	New development will lead to increased light, air and noise pollution from traffic. Pollution of groundwater is also an issue as the District is on a major chalk aquifer with high groundwater vulnerability.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	X	X	X	Increasing the total number of homes and other facilities is likely to lead to an increase in GHG emissions, even if new homes are built to high energy standards. Development is also likely to result in increased car journeys, and add to greenhouse gas emissions.
4(b) Improve the District's ability to adapt to climate change	?	?	?	Partly depends on design and location of development. However, the District has amongst the lowest rainfall (125mm/y) in the UK, and the new developments will increase the pressure on the water supply infrastructure.
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	√	√	√	The policy is designed to meet local housing need and to support services and business in villages.
5(b) Provide access to services and facilities for all	√	√	√	Development should help support and enhance services, especially in rural villages
5(c) Promote community cohesion	√	√	√	By concentrating development in and around existing settlements should help promote the viability of these towns and villages. By promoting affordable housing, schools and other services will help support communities
5(d) Increase access to decent and affordable housing	√	√√	√√	The new housing provided should lead to an increase in affordability (or at least slower price rises). To ensure that affordability is maximised then plan should set a requirement for a significant percentage of affordable homes. This is done in Core Policy 5
5(e) Reduce crime rates and fear of crime	?	?	?	Depends on design of new developments. Other plan policies address this issue
5(f) Improve conditions and services that engender good health and reduce health inequalities	?	?	?	Permits new development that meets local need, including of health services. As a negative impact the policy is likely to increase traffic levels.
5(g) Increase participation in education and life-long learning	√	√	√	Permits new development that meets local need, including of education services.

5(h) Maintain and improve culture, leisure and recreational activities that are available to all	0	0	0	No significant impact
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	X	XX	XX	New housing will significantly increase water use in the District, and put significant pressure on water infrastructure.
6(b) Reduce waste	0	0	0	No significant impact
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	√	√	√	By increasing housing and allowing new development of services should enhance the attractiveness of settlements
<p><b>Conclusions</b> This Policy introduces a degree of flexibility in the general principles set out in Core Policies 5 and 6, enabling development of community facilities in particular circumstances.</p> <p><b>Uncertainties</b> The number of new homes on Greenbelt that will be permitted through this policy</p> <p><b>Recommendations/Mitigation</b> Monitoring of developments permitted under Policy 7 should be undertaken and its impact on Greenbelt development assessed after an appropriate time period</p> <p><b>NHDC Response</b> Monitoring will be carried out of all policies through the Annual Monitoring Report</p>				

<p><b>Countryside and Green Belt Policy CGB4: Rural Workers' Dwellings</b> New dwellings will be allowed to support existing agricultural, forestry and other rural businesses, where:</p> <ol style="list-style-type: none"> <li>1. There is a clearly established existing functional need;</li> <li>2. The unit and the rural business concerned have been established for at least three years, have been profitable for at least one of them, are currently financially sound, and should remain so; and</li> <li>3. The functional need could not be fulfilled by another existing dwelling on the unit, or any other existing accommodation in the area which is suitable and available for occupation by the workers concerned.</li> </ol> <p>Where agricultural occupancy conditions have been imposed upon a dwelling, permission will only be granted for the removal of those conditions where the circumstances which led to the granting of the permission subject to the occupancy condition have significantly changed and where there is clear evidence that there is no need in the locality for an agricultural worker's dwelling</p> <p><i>Two earlier policies were combined to form this policy. The appraisals of these policies are shown below.</i></p>		
<p><b>S2: Change of use of rural buildings</b> The change of use of existing rural buildings which are no longer needed or suitable for their original purpose will be permitted where the building is:</p> <ol style="list-style-type: none"> <li>1. in keeping with its surroundings; and</li> <li>2. capable of conversion without major reconstruction works; and</li> <li>3. within 800m on foot from the boundary of one of the identified settlements.</li> </ol> <p>Outside this area buildings will only be allowed to change to uses such as forestry, agriculture or other uses appropriate in rural areas. As an exception, changes of use to other uses will only be allowed for listed buildings or buildings worthy of retention in conservation areas where this is the only viable way of retaining the building.</p> <p>Buildings built under permitted development rights will not be considered suitable for conversion unless they have been used for their permitted original purpose for at least ten years. Where such buildings have been used for less than that period before becoming redundant, we will enforce the Town and Country Planning (General Permitted Development) Order 1995 to require those buildings' removal.</p>		
	<p><b>What is the predicted effect on each SA objective?</b></p>	<p><b>Justification for assessment and recommendations for mitigation/improvement</b></p>

<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	<b>x</b>	<b>x</b>	<b>x</b>	May have a limited detrimental effect on the economy of rural areas as it will limit the ability of landowners to sell off redundant buildings for residential use
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	<b>?</b>	<b>?</b>	<b>?</b>	Will limit the refurbishment of existing buildings. As demand for accommodation will remain, this may add pressure for new development elsewhere. However, it is difficult to predict whether this effect will be significant
2(b) Provide access to green spaces	<b>0</b>	<b>0</b>	<b>0</b>	No significant impact
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	<b>√</b>	<b>√</b>	<b>√</b>	Will reduce the new provision of isolated dwellings away from existing settlements. This could be expected to have a positive impact on traffic volumes and on reducing the need to travel
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	<b>0</b>	<b>0</b>	<b>0</b>	No significant impact
3(b) Protect and enhance landscapes	<b>?</b>	<b>?</b>	<b>?</b>	Will control development in rural areas but may lead to an increased number of derelict and abandoned buildings than would otherwise be the case
3(c) Conserve and where appropriate, enhance the historic environment	<b>√</b>	<b>√</b>	<b>√</b>	Policy permits the conservation and renovation of significant and important buildings within rural areas of Hertfordshire.
3(d) Reduce pollution from any source	<b>√</b>	<b>√</b>	<b>√</b>	Policy in part motivated by a desire to reduce diffuse development and therefore the need to use private transport.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	<b>√</b>	<b>√</b>	<b>√</b>	Should have a positive impact on car use and therefore on GHG emissions
4(b) Improve the District's ability to adapt to climate change	<b>0</b>	<b>0</b>	<b>0</b>	No significant impact
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	<b>0</b>	<b>0</b>	<b>0</b>	No significant impact
5(b) Provide access to services and facilities for all	<b>0</b>	<b>0</b>	<b>0</b>	No significant impact
5(c) Promote community cohesion	<b>√</b>	<b>√</b>	<b>√</b>	Will promote development within and close to existing communities
5(d) Increase access to decent and affordable housing	<b>?</b>	<b>?</b>	<b>?</b>	Will limit some renovation of properties in rural areas but not clear what the overall impact on the provision of housing will be
5(e) Reduce crime rates and fear of crime	<b>0</b>	<b>0</b>	<b>0</b>	No significant impact
5(f) Improve conditions and services that engender good health and reduce health inequalities	<b>0</b>	<b>0</b>	<b>0</b>	No significant impact
5(g) Increase participation in education and life-long learning	<b>0</b>	<b>0</b>	<b>0</b>	No significant impact
5(h) Maintain and improve culture, leisure and	<b>0</b>	<b>0</b>	<b>0</b>	No significant impact

recreational activities that are available to all				
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	?	?	?	The refurbishment of existing buildings may be a better option in terms of resource/material use than the encouragement of new build. Overall effect of policy difficult to quantify though
6(b) Reduce waste	?	?	?	The refurbishment of existing buildings may lead to lower waste arisings than new build. Overall effect of policy difficult to quantify though
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	√	√	√	By limiting development in countryside will encourage new housing to be located in or close to existing urban areas and larger villages
<p><b>Conclusions</b> The policy imposes fairly strict controls on the conversion of farm buildings into new residential dwellings. The need for such a policy has been established by the pressure for such development in recent years and the adverse impact such development has on certain aspects of sustainability. As with Policy S2, this policy may have a negative effect on farm viability</p> <p><b>Uncertainties</b> The impact of the policy on the viability of farms</p> <p><b>Recommendations/Mitigation</b> Monitoring of trends in the number and viability of farms in North Herts should be undertaken and an analysis done as to the impact of this Plan policy on the viability of the agricultural sector.</p> <p><b>NHDC Response</b> Where the change of use of a rural building is for a purpose which supports a farm enterprise, the criteria in policy S5 will apply. The suggestion that buildings should be allowed to be converted to other uses in order to keep farm enterprises running is not a long-term sustainable strategy, because it will only produce a finite sum of money for any given farm, raising the question of what happens to the business after they've spent that.</p>				
<p><b>S3: Replacement or extension of rural buildings</b> The replacement of existing buildings outside the identified settlements will be allowed when the proposed building:</p> <ol style="list-style-type: none"> <li>is for the same use as the building being replaced, or where the proposed use would be acceptable under Policy S2;</li> <li>has no materially greater impact than the original;</li> <li>does not exceed 130% of the volume of the original building or the building as it stood on 1 July 1948 if it was built before then; and</li> <li>would achieve a reduction of at least 10% of carbon emissions compared with the building it replaces.</li> </ol> <p>The extension of existing buildings outside the identified settlements will be allowed where the proposed extension:</p> <ol style="list-style-type: none"> <li>does not have a materially greater impact than the original building; and</li> <li>does not lead to extensions amounting to more than 30% of the volume of the original building or the building as it stood on 1 July 1948 if it was built before then.</li> </ol> <p>Outbuildings which require planning permission are treated as extensions and must be sited as close to the main building as possible and be visually subordinate to it.</p>				
	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	√	√	√	Permits the development of existing properties to better meet the needs of residents. Likely to lead to an increase in work for local builders and associated trades
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				

2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	√	√	√	Supports development (with certain caveats) of existing buildings rather than new build.
2(b) Provide access to green spaces	0	0	0	No significant impact
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	?	?	?	Encourages the continued residential use of rural properties. The impact of this policy on transport is unclear as it is difficult to ascertain whether it will lead to more people remaining in the countryside who would otherwise relocate to urban areas to seek more appropriately sized housing.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	0	0	0	No significant impact
3(b) Protect and enhance landscapes	√	√	√	Policy supports the provision of new buildings and extensions that are of an appropriate scale and style to complement existing structures and the wider landscape
3(c) Conserve and where appropriate, enhance the historic environment	√	√	√	Policy supports the provision of extensions to existing old buildings that are of an appropriate scale and style to complement existing structures and the wider landscape.
3(d) Reduce pollution from any source	0	0	0	No significant impact
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	√	√	√	By encouraging all new buildings and extensions to have lower carbon emissions than the structures they replace or amend, the policy should lead to a cut in GHG emissions
4(b) Improve the District's ability to adapt to climate change	?	?	?	Not clear. Policy could also encourage new buildings and refurbishments to implement water conservation measures and other elements of an adaptation response
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	0	0	0	No significant impact
5(b) Provide access to services and facilities for all	0	0	0	No significant impact
5(c) Promote community cohesion	0	0	0	No significant impact
5(d) Increase access to decent and affordable housing	?	?	?	Replacement of existing buildings may lead to a greater provision of housing that is matched to individual needs. However, it is likely that renovation will create larger houses that will appeal to the more affluent rather than those on lower incomes
5(e) Reduce crime rates and fear of crime	0	0	0	No significant impact
5(f) Improve conditions and services that engender good health and reduce health inequalities	0	0	0	No significant impact
5(g) Increase participation in education and life-long	0	0	0	No significant impact

learning				
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	0	0	0	No significant impact
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	?	?	?	Not clear. However, no encouragement in policy to use recycled and reused materials wherever possible
6(b) Reduce waste	0	0	0	Not leading to an expansion of the number of buildings and so unlikely to have a significant impact on waste
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	0	0	0	No significant impact
<p><b>Conclusions</b>  The Policy allows the replacement or extension of rural buildings under certain circumstances. It requires buildings to be in keeping with the surroundings and of an appropriate scale. It also has a requirement that there should be a 10% reduction in CO2 emissions in the new building over the old, something that strengthens the requirement for renewable energy in new build set out in Policy D6.</p> <p><b>Uncertainties</b>  While the commitment to reduce GHG emissions is welcome, there is no similar requirement to implement water conservation measures or the use of more sustainable materials. This is dealt with to some degree by other plan policies but should be cross-referenced here.</p> <p><b>Recommendations/Mitigation</b>  The policy should also encourage new buildings and refurbishments to implement water conservation measures and other elements of an adaptation response, as well the use of sustainable materials, in line with other policies.</p> <p><b>NHDC Response</b>  All new buildings are required to implement water conservation and other measures under the policies in chapter 3 and it is not considered necessary to repeat them in this policy. The reason carbon emissions have been mentioned is that for most aspects of the built environment, the location of the building does not significantly affect the extent to which it will use water or other resources. However, rural buildings generally generate a higher need to travel than buildings located in towns. The reference to reducing carbon emissions over and above what would be required elsewhere is therefore trying to mitigate some of the increased travel demand.</p>				

## Transport

### Transport Policy T1: Sustainable Transport

To help deliver accessibility improvements and the promotion of sustainable transport, development proposals in the district should:

1. Be in locations which enable sustainable journeys to be made to key services and facilities;
2. Comply with the provisions of the Local Transport Plan;
3. Ensure that a range of alternative transport options are available to occupants or users. This may involve new or improved pedestrian, cycle and passenger transport links and routes;
4. In the construction of strategic sites, allow for the early implementation of sustainable travel infrastructure in order to influence the behaviour of occupiers or users and in order that sustainable travel patterns become embedded at an early stage.
5. Protect existing rights of way, cycling and equestrian routes and, should diversion be unavoidable, provide replacement routes to the satisfaction of the Council.

*The appraisal of an earlier version of this policy is shown below.*

#### 15: Transport

Development will be located in such a way as to minimise the need to travel whilst promoting a safer, healthier and an inclusive society, supporting economic growth and protecting and enhancing the environment. Development will be designed so as to specifically promote walking, cycling and public transport use ahead of the private car to access jobs, shops, education, health facilities and other key day to day services. Travel demands arising from new development will need to be accommodated by post-development infrastructure, which may require new infrastructure and services to be provided by new development.

Development will need to be designed so as to address the needs of the following hierarchy of users (in order of priority):

1. Pedestrians and especially the mobility impaired as well as Emergency and Public Service Vehicles
2. Cyclists and, where appropriate, horse riders
3. Passenger Transport
4. Powered two wheelers
5. Cars and all forms of Goods Vehicles

This hierarchy does not suggest that transport modes lower down the list of priority will be ignored when development is designed, rather it requires that the needs of those further up the list must be considered first.

A development that is located and designed so as to be contrary to the above approach and hierarchy will not be permitted.

SA Objectives	What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement
	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	√	√	√	The policy encourages sustainable transport which should, over the longer term, have beneficial effects on the economic wellbeing of the population (mainly via new developments) in urban and rural areas (e.g. access to jobs and key services). Proposals relating to improvements in connectivity and transport in urban and employment areas should instill greater business confidence, strengthen existing/future business sectors
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield	0.	0.	0.	No significant impact when considered in isolation- this will be dependent upon



land and other land with high environmental and amenity value?				location of any development.
2(b) Provide access to green spaces	√	√	√	The policy will result in improved footpaths and cycleways.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√	√	√	The policy is directly concerned with reducing the need to travel and in promoting more sustainable transport choices.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	?	?	?	Restricting the need to travel by car may have some biodiversity benefits (e.g. improved air quality).
3(b) Protect and enhance landscapes	?	?	?	The policy may be supportive of less road use/road building, which may have a positive effect upon the landscape.
3(c) Conserve and where appropriate, enhance the historic environment	?	?	?	See comments above.
3(d) Reduce pollution from any source	√	√	√	The policy is supportive of more sustainable modes of travel which should have positive impacts in terms of reducing carbon dioxide and particulate emissions. Travel plans (refer to T6) and Green Travel Plans contained within development proposals an adopted by employers will also assist in reducing reliance on the private car/make car use more efficient.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	√	√	√	Refer to comments above.
4(b) Improve the District's ability to adapt to climate change	√	√	√	Refer to comments in 3(d).
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	○.	○.	○.	No significant impact.
5(b) Provide access to services and facilities for all	√	√	√	The policy is supportive of limiting travel by ensuring developments have good access to key services. This is mainly concerned with new developments and the policy should address how the links will be made with existing settlements.
5(c) Promote community cohesion	○.	○.	○.	No significant impact.
5(d) Increase access to decent and affordable housing	○.	○.	○.	No significant impact
5(e) Reduce crime rates and fear of crime	○.	○.	○.	
5(f) Improve conditions and services that engender good health and reduce health inequalities	√	√	√	Promotion of more sustainable transport choices such as walking and cycling has positive health implications. There may be improved access to health facilities through locating new developments in sustainable locations. Furthermore, offering alternatives to the private car may also improve air quality in the area as well as road safety.
5(g) Increase participation in education and life-long learning	○.	○.	○.	No significant impact.
5(h) Maintain and improve	○.	○.	○.	No significant impact- although physical

culture, leisure and recreational activities that are available to all				access to these activities and facilities may be improved.
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	0.	0.	0.	No significant impact.
6(b) Reduce waste	0.	0.	0.	No significant impact.
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	√	√	√	The policy may facilitate better access to jobs and key services-(mainly in new developments).
<p><b>Conclusions</b>  The policy strongly advocates development in sustainable, accessible locations. The policy performs well in terms of provision of more sustainable transport choices and access to key services, facilities and jobs (in new developments). Proposals relating to improvements in connectivity and transport in urban and employment areas should instill greater business confidence, strengthen existing/future business sectors  The policy also supports reductions in traffic congestion and thus, improved air quality and also, promotion of road safety.</p> <p><b>Uncertainties:</b>  The actual impacts of the policy will depend on how it is applied to developments and whether it leads to reduced or less increased car use</p> <p><b>Recommendations/Mitigation:</b>  Public transport infrastructure and cycle ways and footpaths need, wherever possible, to be in place well in advance of new development occurring, and the policy should seek to achieve this.</p> <p><b>NHDC Response</b>  Recommendation Accepted. Include reference to need for infrastructure to be in place in advance of new development where reasonable. Reference only needed in Core Policy as it will apply to all Development Policies.</p>				

<p><b>Transport Policy T2: Parking</b>  Development proposals should make provision for parking in accordance with the standards set out in the Vehicle Parking Provision at New Development Supplementary Planning Document.</p> <p>Applications should clearly identify how they provide for all likely types of parking demand and that overspill parking from development will not give rise to safety or amenity concerns on existing streets.</p> <p><i>The appraisal of an earlier version of this policy is shown below.</i></p> <p><b>T7: Vehicle parking</b>  A development proposal will be required to make provision for vehicle parking in accordance with the standards set out in the Vehicle Parking Provision at New Development Supplementary Planning Document (SPD).  Car parking standards in the SPD are the maximum provision except for parking for disabled persons, which are the permitted minimum.  In the five settlements identified in the SPD, the Council will require car parking provision for non-residential development to be reduced below the maximum standards in accordance with the methodology set out in the SPD.  For residential development, the Council will require car parking provision in line with the standards shown as they have an amount of reduction designed into them.  Where a development proposal seeks to reduce car parking below the standard identified by the SPD, the developer may be required to demonstrate in a Transport Statement that vehicle parking will not occur in locations not designed or intended for that purpose resulting in unacceptable:</p> <ol style="list-style-type: none"> <li>1. Impacts on highway safety conditions including access specifically for emergency and servicing vehicles.</li> <li>2. Restrictions on the safe and convenient movement of pedestrians, cyclists, passenger</li> </ol>
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transport and access generally to streets and buildings.				
3. Impacts on residential amenity or the wider public realm.				
Any development that is unable to provide vehicle-parking provision in line with the SPD and/or satisfy the above criteria will not be permitted.				
	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	0.	0.	0.	No significant impact
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	0.	0.	0.	No significant impact
2(b) Provide access to green spaces	0.	0.	0.	No significant impact
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	X	X	X	Housing density is increasing. The desire to reduce car usage and increase reliance on public transport is producing a situation where new schemes may offer low or zero parking facilities. There is a significant increase in the number of schemes being proposed with minimal or no associated car parking, by both developers and planning authorities. In general, this permits parking requirements to be reduced or eliminated where sites are located close to essential amenities and public transport. The policy should address zero parking as optimum and promote more cycle parks..
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	?	?	?	This will be dependent upon the location of new vehicle parking and whether it is on PDL/areas of high biodiversity.
3(b) Protect and enhance landscapes	√	√	√	Vehicle parks will not be permitted where residential amenity and wider public realm will be adversely affected.
3(c) Conserve and where appropriate, enhance the historic environment	?	?	?	See comments above.
3(d) Reduce pollution from any source	X	X	X	The policy still promotes car use and in turn, polluting atmospheric emissions and noise nuisance. The policy should also pay attention to other environmental impacts of development, (large car parks in particular), looking at mitigation measures such as use of SUDS and installation of interceptors to protect the District's water quality.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	X	X	X	See comments above.
4(b) Improve the District's ability to adapt to climate change	X	X	X	Refer to comments in 3(d). An increase in surface car parks in particular may increase run off rates and

				heighten flood risk- developments should assess flood risk/include adaptation measures such as SUDS.
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	0.	0.	0.	No significant impact.
5(b) Provide access to services and facilities for all	√	√	√	The policy is supportive of cars and other more sustainable vehicles so is likely to benefit a cross section of vehicle owners here.
5(c) Promote community cohesion	0.	0.	0.	No significant impact- although for those developments requiring TAs and travel plans- this may encourage car sharing.
5(d) Increase access to decent and affordable housing	0.	0.	0.	No significant impact.
5(e) Reduce crime rates and fear of crime	0.	0.	0.	No significant impact
5(f) Improve conditions and services that engender good health and reduce health inequalities	0.	0.	0.	The policy partially supports promotion of sustainable modes of transport which may have positive health impacts.
5(g) Increase participation in education and life-long learning	0.	0.	0.	No significant impact.
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	√	√	√	Increased parking may improve access to larger facilities.
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	?	?	?	See comments above on SUDS
6(b) Reduce waste	0.	0.	0.	No significant impact
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	?	?	?	Vehicle parks will not be permitted where residential amenity and wider public realm will be adversely affected. Parking- particularly for cycles, disabled vehicles and powered two wheelers will have positive impacts in terms of access to key services in urban areas. Provision of additional car parks may lead to increased congestion and road accidents.
<p><b>Conclusions</b> The intention of the policy is to manage all (including sustainable) vehicle parking in line with the standards set out in the relevant SPD and appropriate to the scale of development and in line with T1-T6. Parking in those new developments likely to generate increased traffic demand will be managed in accordance with T5 and T6.</p> <p><b>Uncertainties:</b> The impacts will be more clearly defined by how challenging the SPD requirements are</p> <p><b>Recommendations/Mitigation:</b> Whilst not always viable, the policy could also be strengthened by addressing zero parking as the optimum scenario- particularly in some residential developments and have this as one of the implementation and monitoring indicators. The policy should also pay attention to other environmental impacts of development, (large car parks in particular), looking at mitigation and adaptation measures to flood risk (larger surface developments could raise run-off rates) such as use of SUDS and installation of interceptors to protect the District's water quality.</p> <p><b>NHDC Response</b> 1. The issue of 'zero' parking has been covered in the Vehicle Parking SPD to which the policy refers. Zero parking is not considered viable in North Hertfordshire due to the limited nature</p>				

of passenger transport facilities, cycle network and ability to reach facilities on foot. The small market towns/semi-rural nature of the district also means that there is not the 'critical mass' needed to support passenger transport frequencies and scale of services that can be found in Stevenage or Luton.

2. Agreed but covered by Environmental Policies elsewhere.

## Housing

### Housing and Development Strategy Policy HDS1: Provision and distribution of new housing

Over the period 2011-2031, sufficient land will be released for development to enable the delivery of at least 14,200 dwellings.

Of these, 12,100 dwellings are to meet North Hertfordshire's own objectively assessed need for development and are to be located on sites listed in Chapter 12.

The remaining 2,100 dwellings are an allowance to contribute to the unmet need for housing arising from Luton, to be located at Cockernhoe, as set out in Chapter 12.

In the event of an unmet need from Stevenage arising during the plan period land west of the A1(M) may be used for up to 3,100 dwellings in North Hertfordshire to meet Stevenage's unmet need. (These are not counted as part of the 14,200 target above).

SA Objectives	What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement
	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	√	√	√	The policy will lead to an expansion of the population of the main settlements which could be expected to lead to greater local spend and thus a stronger local economy. It will have a significant positive effect on affordability.
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	<b>X</b>	<b>XX</b>	<b>XX</b>	The policy will result in significant development on green field land.
2(b) Provide access to green spaces	√	√	√	Policy HC3 protects existing greenspace and requires provision of new green space in developments. Policy NE2 protects green infrastructure and requires new provision in new development. Therefore this policy is likely to have a positive impact on access to green spaces.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	<b>X</b>	<b>XX</b>	<b>XX</b>	Baseline data shows that 60% of residents currently drive a car or van to work, with an average journey of 15 miles to work and 14 miles for leisure, so this indicates that the majority of people are not working or using leisure facilities in their local town. The new population is likely to follow this pattern, and the new developments would therefore lead to an increase in car use.

3(a) Protect and enhance biodiversity	<b>X</b>	<b>?</b>	<b>?</b>	Policy NE3 protects biodiversity in new developments. However the number of large greenfield developments required to deliver this housing will inevitably have effects on biodiversity, especially in the short term, regardless of mitigation measures.
3(b) Protect and enhance landscapes	<b>X</b>	<b>XX</b>	<b>X?</b>	The number of large greenfield developments required to deliver these housing targets is likely to result in a significant effect on the quality of the landscape. Details of these likely effects are outlined in the appraisals of individual sites in Appendix 7. Mitigation measures identified in the relevant landscape studies, will reduce but not eliminate the potential effects.
3(c) Conserve and where appropriate, enhance the historic environment	<b>X</b>	<b>X</b>	<b>X</b>	The large greenfield developments required to deliver these housing targets incorporate or are adjacent to a significant number of heritage features. Designation will offer some protection to these features, but there are still likely to be effects on the historic environment. Details of these likely effects are outlined in the appraisals of individual sites in Appendix 7.
3(d) Reduce pollution from any source	<b>?</b>	<b>?</b>	<b>?</b>	A number of the proposed large greenfield sites required to meet these targets are in Source Protection Zone 2 and 3, and some contain areas of contaminated land. However, policies NE7, NE8 and NE9 provide protection for water quality and ground water resources.
4(a) Reduce greenhouse gas emissions	<b>X</b>	<b>XX</b>	<b>XX</b>	Policy will lead to a significant increase in the number of dwellings and overall population. As discussed above, it is also likely to lead to an increase in car use. The overall impact on greenhouse gas emissions will therefore be negative, though the magnitude will depend on the energy efficiency and use of embedded renewables in the new housing. The large size of some of the developments is likely to make sustainable energy solutions viable.
4(b) Improve the District's ability to adapt to climate change	<b>?</b>	<b>?</b>	<b>?</b>	A number of the proposed sites required to meet these targets have issues of surface flooding identified. Some have constraints on the use of SuDS.
5(a) Share benefits of prosperity fairly	<b>?</b>	<b>√</b>	<b>√</b>	Some of the development required is likely to contribute to the regeneration of deprived areas. Development on the edge of Luton and Stevenage is likely to provide affordable housing for residents in deprived areas.
5(b) Provide access to services and facilities for all	<b>?</b>	<b>?</b>	<b>?</b>	Developments may help retain rural services, and the large sites will include facilities within them.
5(c) Promote community cohesion	<b>?</b>	<b>?</b>	<b>?</b>	The overall effect is unclear.

5(d) Increase access to decent and affordable housing	√	√√	√√	The new housing would include significant amounts of affordable housing.
5(e) Reduce crime rates and fear of crime	?	?	?	The overall effect is unclear, though policy D1 requires design to take account of the issue.
5(f) Improve conditions and services that engender good health and reduce health inequalities	x	x	x	Initial construction phase for the large new developments required would create noise and other disruption for surrounding local residential areas. Development of the large greenfield sites required to meet this target will inevitably involve increased light, air and noise pollution.
5(g) Increase participation in education and life-long learning	0	√	√	Provision of physical and social infrastructure for developments of this size implies provision of relevant facilities.
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	0	√	√	Provision of physical and social infrastructure for developments of this size implies provision of relevant facilities.
6(a) Use natural resources efficiently; reuse, use recycled where possible	x	x	xx	The new developments required to meet these targets will have significant impacts on demand for water, and on sewerage infrastructure. See conclusions below.
6(b) Reduce waste	?	?	?	Depends on the materials used in new developments and the way their lifestyle is managed.
7 Promote sustainable urban living	?	?	?	The overall effect is unclear as it depends on the detail of how the new sites are developed, and the services provided.
<p><b>Conclusions</b></p> <p>Large scale housing development is proposed , mainly to meet local needs. The need to make this new development economically, socially and environmentally sustainable is a major challenge for the area and for the regional and national bodies involved in delivery. The appraisal of the policy indicates that:</p> <ul style="list-style-type: none"> <li>• The policy should have significant positive impacts on affordability and access to housing, which have been identified as key sustainability issues. It is also likely to have significant positive impacts on access to greenspace and the provision of health, educational, recreational and other community facilities.</li> <li>• However, it is likely to have significant negative impacts on other key issues, particularly use of cars, greenhouse gas emissions, and water resources. There is likely to be an indirect significant negative effect on landscape and the historic environment and possibly biodiversity as a result of the likely development.</li> <li>• 60% of residents currently drive a car or van to work, with an average journey of 15 miles to work and 14 miles for leisure, so this indicates that the majority of people are not working or using leisure facilities in their local town. The new population is likely to follow this pattern, and the new developments would therefore lead to an increase in car use.</li> <li>• New housing will significantly increase water use in the District, and put significant pressure on water infrastructure. In some locations, particularly around Stevenage, it will also put significant pressure on sewerage infrastructure. In terms of water use, policy NE5 requires that all development proposals include measures to limit estimated residential use to 105 litres per person per day. This would be an increased use of around 1.36 billion litres per annum for the planned 14,200 properties. The Environment Agency water strategy for the Anglian Region (which covers the whole District) says that increases in abstraction from the aquifer are not acceptable, so additional water would need to be provided from regional reservoirs. The SEA of the RSS for the East of England Plan also notes the pressure on water infrastructure in the region as a result of proposed new housing provision and the impacts of climate change. The SEA recommends that the potential Stevenage extension should include a sustainable water</li> </ul>				

resources management scheme. Since the District has amongst the lowest rainfall (125mm/y) in the UK, the new developments will reduce the District's ability to respond to climate change. Demand for water is therefore one of the most critical impacts of the proposed new housing that must be managed.

**Uncertainties**

The impacts of this policy will depend on the final numbers and location of the new housing.

**Recommendations/Mitigation**

The sustainability of new development will be reliant to a large degree on the ability of new developments to be integrated properly with existing communities and to be designed to high environmental and social standards. This will be governed by other plan policies. Mitigation measures for specific sites proposed to meet this target are included in the appraisals of sites in Appendix 7.

**Housing and Development Strategy Policy HDS2: Settlement hierarchy**

The majority of the district's development will be located within the settlement boundaries of the following towns:

- Baldock;
- Hitchin;
- Letchworth Garden City;
- Royston;
- Great Ashby;
- Other urban extensions to Stevenage as identified in Chapter 12; and
- Urban extensions to Luton as identified in Chapter 12.

General development will also be allowed within the defined settlement boundaries of the Category A villages of:

- |  |  |
|--|--|
| <ul style="list-style-type: none"> <li>• Ashwell;</li> <li>• Barkway;</li> <li>• Barley;</li> <li>• Breachwood Green;</li> <li>• Cockernhoe;</li> <li>• Codicote;</li> <li>• Graveley;</li> <li>• Hexton;</li> <li>• Ickleford;</li> <li>• Kimpton;</li> <li>• Knebworth;</li> </ul> | <ul style="list-style-type: none"> <li>• Little Wymondley;</li> <li>• Oaklands;</li> <li>• Offley;</li> <li>• Pirton;</li> <li>• Preston;</li> <li>• Reed;</li> <li>• Sandon;</li> <li>• St Ippolyts;</li> <li>• Therfield;</li> <li>• Weston; and</li> <li>• Whitwell.</li> </ul> |
|--|--|

Infilling development which does not extend the built core of the village will be allowed in the Category B villages of:

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>• Blackmore End;</li> <li>• Clothall;</li> <li>• Great Wymondley;</li> <li>• Hinxworth;</li> <li>• Holwell;</li> <li>• Kelshall;</li> <li>• Lilley;</li> </ul> | <ul style="list-style-type: none"> <li>• Newnham;</li> <li>• Old Knebworth;</li> <li>• Peters Green;</li> <li>• Radwell;</li> <li>• Rushden;</li> <li>• Wallington; and</li> <li>• Willian.</li> </ul> |
|---|--|

Only affordable housing and associated development in line with Policy HDS3 on exception sites will be allowed in the Category C villages of:

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>• Bygrave;</li> <li>• Caldecote;</li> </ul> | <ul style="list-style-type: none"> <li>• Langley; and</li> <li>• Nuthampstead.</li> </ul> |
|--|---|

*An earlier version of this policy was appraised. The appraisal is shown below.*

**5: Settlement hierarchy**

All major development will be located within the boundaries of the towns of Baldock, Hitchin, Letchworth Garden City and Royston, the large villages of Codicote and Knebworth and as



<p>extensions to Stevenage and Luton, as defined on the proposals map.          Other development will be allowed within the boundaries of the villages of Ashwell, Barkway, Barley, Hexton, Graveley, Ickleford, Kimpton, Breachwood Green, Great Offley, Oaklands/Mardley Heath (part), Pirton, Preston, Reed, Sandon, St Ippolyts/Gosmore, Whitwell, Therfield, Weston and Little Wymondley, as defined on the proposals map.          Land outside existing settlement boundaries may be allocated for housing or employment in accordance with policies C8 and C17 respectively. Exceptionally, land outside existing settlement boundaries may be allocated for other uses, such as community facilities, where there is an established need which cannot be met within that settlement.</p>				
	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	√	√√	√√	Policy permits new development in and around the main towns and larger villages. This should help increase the affordability of housing and therefore lead to more balanced communities that will in turn support a healthy local economy. The permission of development in larger villages should also maintain their population and the businesses and services that are provided in each location.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	X	XX	XX	This option will still involve development on Greenfield and greenbelt sites in line with PPG2 and PPS7. It is recommended that the provision for development of land outside existing settlements be tightened up to ensure it only allows for facilities that meet very local need.
2(b) Provide access to green spaces	?	?	?	The Housing Capacity study excludes development of open/green spaces. However, there is no explicit statement as to whether new developments will include additional green spaces. If not, sections of the local population may be left isolated from such areas
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√	√	√	The policy encourages development in and around existing settlements which would be expected to reduce the need for people to travel across the area to access services. The plan to target development at those villages with an existing school should help maintain the local schools network and other village services and thus reduce the need for residents to travel to larger settlements on a regular basis
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	X?	X?	X?	Policy will involve limited greenfield development around towns and villages. The BAP indicates that these areas include "areas high in biodiversity", key areas for farming wildlife and key grassland habitats and so care needs to be taken to protect these areas. Impact depends on precise location of development.

3(b) Protect and enhance landscapes	?	?	?	Impact dependent on the location of development although other Plan policies do protect landscape. Some of the areas around towns and villages are in or close to an AONB and care must be taken to protect this. Other policies address this issue
3(c) Conserve and where appropriate, enhance the historic environment	?	?	?	Impact dependent on the location of development. Other policies seek to protect the historic environment
3(d) Reduce pollution from any source	X	XX	XX	New development will lead to increased light, air and noise pollution from traffic although the growth of traffic should be limited due to the location of the new housing in and around existing settlements. Pollution of groundwater is also an issue as the District is on a major chalk aquifer with high groundwater vulnerability.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	X	XX	XX	Increasing the total number of homes is likely to lead to an increase in GHG emissions, even if new homes are built to high energy standards. Development is also likely to result in increased car journeys, and add to greenhouse gas emissions.
4(b) Improve the District's ability to adapt to climate change	?	?	?	Partly depends on design and location of developments. However, the District has amongst the lowest rainfall (125mm/y) in the UK, and the new developments will increase the pressure on the water supply infrastructure. The issue of climate change adaptability needs to be addressed in Plan policies on the Environment to ensure that it is considered in all new developments
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	?	?	?	Depends on how the issue of affordable housing is addressed (see Core Policy 5) and how new housing helps contribute to the regeneration of Hitchin and Letchworth. However, policy is likely to lead to greater provision of affordable homes and therefore more fairness in housing provision
5(b) Provide access to services and facilities for all	√	√	√√	Development should help support and enhance services, especially in rural villages. The allowing of development outside boundaries in exceptional cases could contribute to the provision of services and facilities.
5(c) Promote community cohesion	√	√	√	By concentrating development in existing settlements should help promote the viability of these towns and villages. The allowing of development outside boundaries in exceptional cases could contribute to the provision of community facilities.
5(d) Increase access to decent and affordable housing	√	√√	√√	The large amount of new housing provided should lead to an increase in affordability (or at least slower price rises). To ensure that affordability is maximised then plan should set a requirement for a significant percentage of affordable homes. This is

				done in Core Policies 4 and 5
5(e) Reduce crime rates and fear of crime	?	?	?	Depends on design of new developments. Other plan policies address this issue
5(f) Improve conditions and services that engender good health and reduce health inequalities	?	?	?	Provision of housing in some areas may help support local health services and reduce centralisation. May also improve the living conditions of many people as more affordable housing could be available. As a negative impact the policy is likely to increase traffic levels and therefore air pollution, although the baseline data indicates that this is unlikely to be significant in most areas.
5(g) Increase participation in education and life-long learning	0	0	0	Not directly relevant
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	√	√	√	Is likely to lead to an increase in the population of some settlements which may be expected to support and enhance leisure and recreation facilities
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	X	XX	XX	New housing will significantly increase water use in the District, and put pressure on water infrastructure. The Environment Agency water strategy for the Anglian Region says that increases in abstraction from the aquifer are not acceptable, so additional water would need to be provided from regional reservoirs. The SEA of the RSS for the East of England Plan notes the pressure on water infrastructure in the region as a result of proposed new housing provision and the impacts of climate change.
6(b) Reduce waste	X	X	X	Growth in households should lead to more waste arisings
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	√	√	√√	By increasing population in towns and villages should support services and enhance the overall attractiveness of individual settlements
<p><b>Conclusions</b>  The policy is clear in setting out its aim which is to ensure that new housing is provided but concentrated in the main existing settlements. This should help meet the need for more homes in a way which is consistent with the views of the local population (as identified through survey) and will help meet certain environmental criteria.  The allowing of development outside boundaries in exceptional cases could contribute to the provision of services and facilities. However, it is recommended that the wording be tightened up to ensure it only allows for facilities that meet very local need.</p> <p><b>Uncertainties</b>  Uncertainties exist around aspects of the policy, most notably in its ability to deal with certain environmental issues. These issues include water availability, climate change adaptation, biodiversity and greenspaces</p> <p><b>Recommendations/Mitigation</b>  This policy has a clear aim, to set out a settlement hierarchy. The uncertainties noted above (on the impact of this policy on water availability, climate change adaptation, biodiversity and greenspaces) are more sensibly addressed through other plan policies rather than by additions to this policy. However, it is recommended that the wording of the final sentence be strengthened to say "where there is an established <b>local</b> need"</p> <p><b>NHDC Response</b>  Noted.</p>				

### Housing and Development Strategy Policy HDS3: Affordable housing

The Council will secure a range of homes in terms of tenure, size and design. Overall, we aim to make 35% of the new dwellings in the district affordable housing, which will be secured using the following sliding scale:

<i>Size of site (gross dwellings)</i>	<i>Minimum percentage of dwellings which must be affordable</i>
10 – 14 dwellings	30%
15 – 24 dwellings	35%
25 or more dwellings	40%

Where development of a site is phased or divided into separate parts, or could reasonably be considered part of a larger development which would exceed the thresholds, it will be considered as a whole for the purposes of affordable housing provision.

The size, type and tenure of affordable housing will be determined by:

1. the housing needs of the area (as established through the results of the latest Housing Needs Survey, Strategic Housing Market Assessment or other information);
2. relevant local authority housing register data; and
3. the policies and objectives of the latest relevant Housing Strategies.

To secure the benefits of affordable housing for first and subsequent occupiers of affordable dwellings, any such development must be subject to an appropriate condition or legal agreement providing for the retention of dwellings under such arrangements through the Council, registered provider or similar body agreed with the Council.

*The appraisal of an earlier version of this policy is shown below.*

<b>SA Objectives</b>	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	√	√	√√	The Housing Needs Survey notes that the current provision is not meeting the growth in need for affordable housing. It also points out that 75% of new households are not able to afford to purchase in their own right. Policy seeks to gain the right balance between encouraging affordable housing and not deterring developers from providing new housing in North Herts, and it is considered that the percentage requirement for different sizes of development is helpful in this regard.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	<b>0</b>	<b>0</b>	<b>0</b>	Policy does not affect decisions on location of development.

2(b) Provide access to green spaces	0	0	0	Policy does not affect decisions on location and access arrangements in developments.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	0	0	0	Policy does not affect decisions on location and access arrangements in developments.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	0	0	0	Policy does not affect decisions on location of development and management of impacts on this issue.
3(b) Protect and enhance landscapes	0	0	0	Policy does not affect decisions on location of development and management of impacts on this issue.
3(c) Conserve and where appropriate, enhance the historic environment	0	0	0	Policy does not affect decisions on location of development and management of impacts on this issue.
3(d) Reduce pollution from any source	0	0	0	Policy does not affect decisions on location of development and management of impacts on this issue.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	0	0	0	Policy does not affect decisions on location of development and management of impacts on this issue.
4(b) Improve the District's ability to adapt to climate change	0	0	0	Policy does not affect decisions on location of development and management of impacts on this issue.
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	√	√	√√	Policy will lead to a lowering of local house prices and a greater provision of local affordable homes.
5(b) Provide access to services and facilities for all	√	√	√√	By enabling those on lower incomes to continue to live in the area it will help improve access to services for lower income groups. The Housing Needs Survey notes that there is a need for different types of affordable housing, and particularly for flats. It also notes the need for sheltered housing for older people and supported and adapted housing for disabled people. It is not clear if this policy would address these needs. It also points out that BME households have lower average incomes, and affordability is therefore more of an issue for them.
5(c) Promote community cohesion	√	√	√	Policy provides housing for those on lower incomes, allowing local people to remain in the area, and seeks to encourage mixed communities. Both these should improve community cohesion.
5(d) Increase access to decent and affordable housing	√	√	√√	The explicit aim of the policy. It is suggested that this would be useful to clarify the policy by listing the range of options included social rented housing, shared equity and "homebuy" schemes.
5(e) Reduce crime rates and fear of crime	?	?	?	By promoting community cohesion may help reduce crime but not enough evidence to be certain of this
5(f) Improve conditions and services that engender good health and reduce health inequalities	√	√	√	There are clear links between provision of affordable housing and health and well-being.
5(g) Increase participation in education and life-long	0	0	0	No significant impact

learning				
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	0	0	0	No significant impact
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	0	0	0	No significant impact
6(b) Reduce waste	0	0	0	No significant impact
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	√	√	√	By promoting mixed neighbourhoods should contribute to more sustainable communities
<p><b>Conclusions</b></p> <p>Affordable housing is clearly a major issue for North Herts, one that impacts significantly on the less affluent and which leads to less sustainable communities. The Housing Needs Survey notes that the current provision is not meeting the growth in need for affordable housing. It also points out that 75% of new households are not able to afford to purchase in their own right. Policy is likely to make an effective contribution to addressing this issue. It seeks to gain the right balance between encouraging affordable housing and not deterring developers from providing new housing in North Herts, and it is considered that the percentage requirement for different sizes of development is helpful in this regard. It is suggested that it would be useful to clarify the policy by listing the range of options included social rented housing, shared equity and "homebuy" schemes.</p> <p>By enabling those on lower incomes, including young and older people, to continue to live in the area it will help improve access and contribute to community cohesion. The Housing Needs Survey notes that there is a need for different types of affordable housing, and particularly for flats. It also notes the need for sheltered housing for older people and supported and adapted housing for disabled people. It is not clear if this policy would address these needs. The Survey also points out that BME households have lower average incomes, and affordability is therefore more of an issue for them.</p> <p><b>Uncertainties</b></p> <p>The effects of this policy will, to some extent, be determined by future changes in the housing market, which are difficult to predict.</p> <p><b>Recommendations/Mitigation</b></p> <p>The positive impacts of the policy could be improved by:</p> <ul style="list-style-type: none"> <li>• requiring an appropriate percentage of adapted housing for disabled people</li> <li>• clarifying in the policy text the meaning of affordable housing by listing the range of options included social rented housing, shared equity and "homebuy" schemes.</li> </ul> <p><b>NHDC Response</b></p> <p>We do not have sufficient evidence to establish a required percentage for adapted housing for the disabled. Further, this issue is separate from the overall provision of affordable housing. Affordable housing is for those who cannot afford to access the market. Disabilities may affect people who are able to afford open market housing. None of the policies in the plan preclude specialist housing being built, but we feel it is inappropriate to require a percentage of adapted housing.</p> <p>The policy supporting text refers to the new definition of affordable housing in PPS3. The precise range of options is not discussed as these will vary over time and between different parts of the district. An SPD to cover this is proposed.</p>				

## Housing and Development Strategy Policy HDS4: Density

New housing development should optimise the use of land so as to create socially sustainable communities and respect any established character of the area. New development on the periphery of a settlement should generally be at a lower density to mark the transition to the rural area beyond. In town centres and close to the railway stations higher densities may be appropriate in principle but will require particular care in the design with respect to avoiding the sense of overcrowding or congestion.

*An earlier version of this policy was appraised and is shown below.*

SA Objectives	What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement
	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	√	√	√√	Support for mixed use development should provide a range of location and facilities for business start-up and development. Providing for lower densities in appropriate locations should support home working (by providing more space in homes). Providing for higher density housing should also contribute to the affordability of housing.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	?	?	?	Policy allows for relatively high densities in town centres and near rail stations though it restricts densities on the edge of settlements. Whether this results in increased use of brownfield sites is unclear, and will depend on the details of location of development.
2(b) Provide access to green spaces	?	?	?	No mention in policy as to how density can be linked to the provision of green spaces.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√	√	√	Policy encourages relatively high density development near town centres and rail stations which should serve to increase the proportion of the population living in such areas, and encourage use of public transport. In addition, the promotion of mixed use development will provide opportunities for people to live close to their work.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	0	0	0	No significant impact
3(b) Protect and enhance landscapes	√	√	√	Policy seeks to set the right balance between density and development sprawl, both of which could be detrimental to landscape if taken to extremes.
3(c) Conserve and where appropriate, enhance the historic environment	0	0	0	No significant impact
3(d) Reduce pollution from any source	0	0	0	No significant impact
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	√	√	√	More dense settlements are generally more energy efficient. By setting density levels the policy should encourage more energy efficient dwellings. Also see comments above re transport.
4(b) Improve the District's ability to adapt to climate	0	0	0	No significant impact

change				
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	√	√	√	Support for mixed use development should provide a range of location and facilities for business start-up and development, including in deprived areas.
5(b) Provide access to services and facilities for all	√	√	√	Allowing higher densities in town centres and adjacent to Railway Stations should help meet the needs of young people.
5(c) Promote community cohesion	√	√	√	By attempting to achieve developments that are neither too sprawling or too dense, the policy should encourage community harmony
5(d) Increase access to decent and affordable housing	√	√	√	It could be expected that more dense developments would be cheaper per unit to provide. This may assist in the provision of lower cost housing. It is unclear what effect the requirement to have no more than 75% of dwellings of one housing type will have. Proposed developments consisting mainly of flats would be required to contain 25% of other dwelling types, which could just mean terraced houses. Alternatively new developments of mainly detached houses would be required to contain 25% of other types which could just mean semi-detached housing. The 2002 Housing Needs Survey notes that there was a significant gap between the new household need for flats and the stock supply, but the preamble (5.19) notes that in the last 5 years, there have been more flats and terraced housing built. It is therefore not clear whether this gap still exists. Allowing relatively high densities should encourage flats to continue to be built.
5(e) Reduce crime rates and fear of crime	0	0	0	No significant impact
5(f) Improve conditions and services that engender good health and reduce health inequalities	0	0	0	No significant impact
5(g) Increase participation in education and life-long learning	0	0	0	No significant impact
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	0	0	0	No significant impact
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	√	√	√	More dense development would be expected to be more efficient in the use of resources per dwelling
6(b) Reduce waste	0	0	0	No significant impact.
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	√	√	√	Support for mixed use development will contribute to this objective.
<b>Conclusions</b>				
As the policy preamble notes, there are strong reasons for promoting density of development but also certain disadvantages of development that is too dense, particularly for an area such as North Herts with many villages and small towns and with a traditionally diffuse development structure. The policy does balance these two competing aims. The support for mixed use development will also have a significant positive impact on a number of the appraisal objectives.				



**Uncertainties**

It is unclear what effect the requirement to have no more than 75% of dwellings of one housing type will have. The 2002 Housing Needs Survey notes that there was a significant gap between the new household need for flats and the stock supply, but the preamble (5.19) notes that in the last 5 years, there have been more flats and terraced housing built. It is therefore not clear whether this gap still exists.

**Recommendations/Mitigation**

The Housing Needs Survey be updated to understand whether the gap between new household need and stock supply still exists.

**NHDC Response**

Housing Needs Survey is in the process of being updated (at June 2007). Any relevant findings may be incorporated.

**Housing and Development Strategy Policy HDS5: Relatives’ and dependents’ accommodation**

Relatives’ and dependents’ accommodation should be formed by the adaptation or extension of the main dwelling. Free standing annexes will only be allowed if it can be shown that adaptation or extension of the main house is not possible.

For annexes the following criteria will be applied:

1. a genuine need must be shown;
2. the occupation of the accommodation will be restricted by a condition on the planning permission to being ancillary to the main dwelling;
3. the annex is subordinate to the main dwelling and designed in such a way that if its use as accommodation for dependants ceases it can be easily incorporated into the main house; and
4. in the rural area, any extensions must not exceed the size of extension that would be acceptable under the other policies of this plan.

*The appraisal of an earlier version of this policy is shown below.*

**H4: Dependants’ accommodation**

Proposals for accommodation for dependants of a household within the curtilage of that house will be allowed where a separate dwelling of that form would be acceptable in its own right. Where a separate dwelling of that form would not be acceptable, the following criteria will be applied:

- a. a genuine need must be shown;
- b. the occupation of the accommodation will be restricted by a condition on the planning permission to being ancillary to the main dwelling;
- c. the proposed accommodation is formed by the adaptation or extension of the main dwellings;
- d. the annex is subordinate to the main dwelling and designed in such a way that if its use as accommodation for dependants ceases it can be easily incorporated into the main house;
- e. in the rural area, any extensions must not exceed the size of extension that would be acceptable under the other policies of this plan.

	What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement
SA Objectives	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	<b>0</b>	<b>0</b>	<b>0</b>	No significant impact
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				

2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	?	?	?	Policy will help ensure that relatives and other in need of care are provided with accommodation as part of existing dwellings. This may reduce pressure for new build but as many of those needing care are already resident elsewhere in the area the impact is unlikely to be significant
2(b) Provide access to green spaces	0	0	0	No significant impact
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	0	0	0	No significant impact
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	0	0	0	No significant impact
3(b) Protect and enhance landscapes	?	?	?	Depends on whether extensions are appropriate in scale and character. This is however governed by other Plan policies
3(c) Conserve and where appropriate, enhance the historic environment	?	?	?	See 3(b) above
3(d) Reduce pollution from any source	0	0	0	No significant impact
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	?	?	?	No clear impact of policy on GHG emissions
4(b) Improve the District's ability to adapt to climate change	0	0	0	No significant impact
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	0	0	0	No significant impact
5(b) Provide access to services and facilities for all	0	0	0	No significant impact
5(c) Promote community cohesion	√	√	√	By enabling carers to live close to dependents should help support family and community ties
5(d) Increase access to decent and affordable housing	?	?	?	By moving dependents into a dwelling adjoining their carer may free up housing elsewhere. Unclear whether this will be significant
5(e) Reduce crime rates and fear of crime	0	0	0	No significant impact
5(f) Improve conditions and services that engender good health and reduce health inequalities	√	√	√	By placing dependents close to carers should help with their health care needs
5(g) Increase participation in education and life-long learning	0	0	0	No significant impact
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	0	0	0	No significant impact
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	?	?	?	Will encourage new extensions to be built but may free up housing elsewhere which could then be used in preference to new build
6(b) Reduce waste	0	0	0	No significant impact
<b>TOWN CENTRES</b>				
7 Promote sustainable	√	√	√	Should encourage better community

urban living				cohesions and higher standards of care for dependents.
<p><b>Conclusions</b> The policy is clear in its aim and refines the definition of what could be classified as dependent accommodation from that in the previous Local Plan.</p> <p><b>Uncertainties</b> No great uncertainties, although the impact on overall housing availability is unclear. As recognised by the Council, enforcing and policing such a policy may be problematic</p> <p><b>Recommendations/Mitigation</b> None identified</p> <p><b>NHDC Response</b> Noted.</p>				

<p><b>Housing and Development Strategy Policy HDS6: Gypsies, Travellers and Travelling Showpeople</b></p> <p>The Council will bring forward and safeguard proposals for additional Gypsy, Traveller and Travelling Showpeople’s pitches to meet local need, informed by the Council’s GTAA.</p> <p>We will allocate the area covered by the 6 temporary permission pitches at Pulmore Water to meet the district’s needs up to 2028.</p> <p>The criteria which will be used to identify suitable locations and to inform decisions on planning applications for Gypsies, Travellers and Travelling Showpeople and associated facilities are:</p> <ol style="list-style-type: none"> <li>1. the intended occupants meet the definition of Gypsies and Travellers, or Travelling Showpeople, as set out in government guidance or case law;</li> <li>2. the residents of the site can access local services such as shops, schools, public transport and medical facilities which are within a reasonable distance from the site and have capacity to meet the needs of the site’s residents;</li> <li>3. the site does not conflict with any other development plan policy or national policy including flood risk, agricultural land classification, contamination and hazardous development, and has no significant adverse impact on the character and appearance of the countryside, or on features of significant biodiversity importance;</li> <li>4. the site has no significant adverse impact on the amenity of nearby residents or adjoining land users and can be successfully screened and contained within a specified boundary;</li> <li>5. the site has adequate and safe access from a suitable road, and adequate parking, storage, turning and servicing on site;</li> <li>6. the site is capable of being serviced with water, electricity, sewerage and rubbish disposal; and</li> <li>7. the site will provide a safe, inclusive and secure environment for the residents in an appropriate location to meet their needs.</li> </ol> <p>Where all the above criteria are met, proposals for sites for Gypsies, Travellers and Travelling Showpeople may be appropriate in the countryside as rural exception sites (in line with CGB3) but green belt policies would still apply.</p> <p><i>The appraisal of an earlier version of this policy is shown below.</i></p> <p><b>H5: Gypsies and travelling show people</b></p> <p>Sites for gypsy and traveller accommodation, or extension to existing sites, will be granted planning permission if all the following criteria are met:</p> <ul style="list-style-type: none"> <li>• The intended occupants meet the definition of gypsies or travelling showpeople, as set out in Government guidance and modified by the courts;</li> <li>• There is no significant adverse impact on the character and appearance of the countryside;</li> <li>• There is no significant adverse impact on the amenity of nearby residents or adjoining land users;</li> <li>• The site has adequate and safe access from a suitable road, and adequate parking, turning and servicing on site;</li> <li>• The site is within a reasonable distance from local services such as shops, schools and medical facilities;</li> </ul>
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<ul style="list-style-type: none"> <li>The site is capable of being serviced with water, electricity, sewerage and rubbish disposal. Proposals for sites for gypsy and travelling showpeople may be appropriate in the countryside, except in the Green Belt, where all the above criteria are met.</li> </ul>				
	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	<b>0</b>	<b>0</b>	<b>0</b>	No significant impact
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	√	√	√	Policy prevents development of such sites in the Greenbelt and imposes restrictions on their development elsewhere
2(b) Provide access to green spaces	<b>0</b>	<b>0</b>	<b>0</b>	No significant impact
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√	√	√	Places Gypsy/traveller sites close to amenities which should reduce daily travel requirements
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	?	?	?	No mention of protection of sites of biodiversity from use as traveller sites.
3(b) Protect and enhance landscapes	√	√	√	Requires sites to be sited where there is no adverse impact on the character of the countryside
3(c) Conserve and where appropriate, enhance the historic environment	?	?	?	No direct mention of protecting historic sites although this is covered by Historic environment policies
3(d) Reduce pollution from any source	<b>0</b>	<b>0</b>	<b>0</b>	No significant impact
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	<b>0</b>	<b>0</b>	<b>0</b>	No significant impact
4(b) Improve the District's ability to adapt to climate change	<b>0</b>	<b>0</b>	<b>0</b>	No significant impact
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	√	√	√	Permits the provision of sites for Gypsy and travelling people, one of the poorest groups in the community
5(b) Provide access to services and facilities for all	√	√	√	Requires that sites provide basic services (e.g. electricity) and are located near to settlements with a wider range of services
5(c) Promote community cohesion	√	√	√	By allowing gypsy sites, but only in appropriate locations, should help reduce illegal sites and lower tensions between the itinerant and sedentary population
5(d) Increase access to decent and affordable housing	<b>0</b>	<b>0</b>	<b>0</b>	No significant impact
5(e) Reduce crime rates and fear of crime	<b>0</b>	<b>0</b>	<b>0</b>	No significant impact
5(f) Improve conditions and services that engender good health and reduce health inequalities	√	√	√	Requires that sites be located in areas where this is access to health facilities
5(g) Increase participation in education and life-long	√	√	√	Requires that sites be located in areas where this is access to schools

learning				
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	0	0	0	No significant impact
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	0	0	0	No significant impact
6(b) Reduce waste	√	√	√	Requires that sites have adequate waste facilities
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	0	0	0	No significant impact – only affects rural areas.
<p><b>Conclusions</b> The policy reflect guidance in Circular 1/2006 and thus helps ensure that the needs of gypsies/travellers are considered within LDFs. The policy imposes criteria that ensure that sites are only placed in appropriate locations.</p> <p><b>Uncertainties</b> None identified</p> <p><b>Recommendation / Mitigation</b> It is suggested that the policy is reworded to state 'There is no significant adverse impact on the character and appearance of the countryside <i>or on sites of significant biodiversity importance.</i>'</p> <p><b>NHDC Response</b> Amend policy as recommended</p>				

## Design

<p><b>Design Policy D1: Design and Sustainability</b></p> <p>The Council considers good design to be a key aspect of sustainable development.</p> <p>The design and location of development proposals should where appropriate, :</p> <ol style="list-style-type: none"> <li>1. respond positively to the site's local context;</li> <li>2. create or enhance public realm;</li> <li>3. optimise the potential of the site by incorporating SuDS;</li> <li>4. consider the retention of existing vegetation;</li> <li>5. be usable, in terms of accessibility, legibility and connectivity;</li> <li>6. design-out opportunities for crime and anti-social behaviour;</li> <li>7. minimise the visual impact of street furniture and car parking.</li> </ol> <p>This list is illustrative, not exhaustive.</p> <p>Specific guidance is set out in the Design SPD.</p> <p><i>Two earlier policies were combined to form this policy. The appraisals of these policies are shown below.</i></p>	
<p><b>3: Design</b></p> <p>Development proposals must achieve: high quality, inclusive designs that respect the special character and distinctiveness<sup>1</sup> of the localities of the District and; the efficient and sustainable use of land and resources at a scale and nature appropriate to the locality.</p> <p><sup>1</sup> Note: character and distinctiveness in design considerations will be informed by Guidance such as Urban Character Studies, Conservation Area Statements etc.</p>	
<b>What is the</b>	<b>Justification for assessment and</b>

SA Objectives	predicted effect on each SA objective?			recommendations for mitigation/improvement
	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	0	√	√	The policy will help to promote improved local environments which will in turn help to attract and stimulate investment.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	√	√	√	'the efficient and sustainable use of land and resources' should result in a greater focus on brownfield land and higher density development in areas well-served by public transport. This would result in less pressure on Greenfield and other land with high environmental and amenity value. However, this could be made more explicit, if not within the policy itself then within the supporting text.
2(b) Provide access to green spaces	0	0	0	No significant impact.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√	√	√	See 2(a)
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	0	0	0	No significant impact.
3(b) Protect and enhance landscapes	√	√	√	'the special character and distinctiveness of localities' could be taken to include landscape.
3(c) Conserve and where appropriate, enhance the historic environment	√√	√√	√√	This is dependent on the necessary Urban Character Studies and Conservation Area Assessments being carried out.
3(d) Reduce pollution from any source	0	0	0	No significant impact.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	0	0	0	No significant impact.
4(b) Improve the District's ability to adapt to climate change	0	0	0	No significant impact.
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	0	0	0	No significant impact.
5(b) Provide access to services and facilities for all	0	0	0	No significant impact.
5(c) Promote community cohesion	√	√	√	Protecting and promoting local character and distinctiveness can help to promote a sense of local identity
5(d) Increase access to decent and affordable housing	0	0	0	No significant impact.
5(e) Reduce crime rates and fear of crime	0	0	0	No significant impact.
5(f) Improve conditions and services that engender good health and reduce health inequalities	0	0	0	No significant impact.
5(g) Increase participation in education and life-long learning	0	0	0	No significant impact.

5(h) Maintain and improve culture, leisure and recreational activities that are available to all	0	0	0	No significant impact.
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	√	√	√	The policy promotes the efficient and sustainable use of land and resources in a general sense.
6(b) Reduce waste	0	0	0	No significant impact, although the efficient and sustainable use of resources implies less waste.
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	0	0	0	No significant impact, although the efficient and sustainable use of land could imply higher density, possibly mixed use, development in urban areas
<p><b>Conclusions</b> This policy is framed in broad, strategic terms, and is principally focused on the protection of local character and distinctiveness and the sustainable use of land and resources. Whilst it is recognised that core policies need to be broad and strategic, the wording used is open to interpretation and the supporting text could be used much more effectively to more clearly articulate the objectives and scope of the policy.</p> <p><b>Uncertainties</b> The effectiveness of this policy is dependent on the necessary Urban Character studies and Conservation Area Assessments being in place.</p> <p><b>Recommendations/Mitigation</b> Supporting text is required which clarifies the objectives and scope of the policy, including the promotion of brownfield development, higher densities in areas well served by public transport, the promotion of sustainable urban living and the protection of landscapes. The text should also clarify what is meant by the use of the word 'inclusive' in this context, since this is unlikely to be widely understood. The promotion of brownfield and mixed use development needs to be more adequately addressed in other policies.</p> <p><b>NHDC Response</b> The supporting text has been substantially expanded to address these points. The word 'inclusive' has been taken out as being too obscure.</p>				
<b>4: Sustainability in development</b>				
All new development will be required to show that it has properly considered its impact on the environment. Developments should show that they have considered the scope to reduce the amount of resources used in and by the development and have minimised the impacts arising from such usage.				
	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	?	√	√	If the requirements are seen to be excessive or more stringent than neighbouring authorities, development may be discouraged in the short term. However, the policy will help to promote improved local environments which will in turn help to attract and stimulate investment. Furthermore, it may boost the local economy through encouraging use of local materials.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				

2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	√	√	√	It is understood that this policy is primarily about the design of development, rather than location. However, with its current wording, depending on how the policy is interpreted, it could help to reinforce other policies which more directly address this objective.
2(b) Provide access to green spaces	○	○	○	No significant impact.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√	√	√	See comments on 2(a). May contribute to development with less provision for car use.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	√√	√√	√√	Providing this policy is supported by clearly articulated DC policy and guidance, effects on this objective should be direct and positive.
3(b) Protect and enhance landscapes	?	?	?	Some aspects of sustainability in design may conflict with this objective in some instances, e.g. the use of PV cells or wind turbines in sensitive areas. However, this can be addressed in further policy and guidance.
3(c) Conserve and where appropriate, enhance the historic environment	?	?	?	See comments for 2(b). The promotion of the use of local materials, which this policy could support, may help to enhance the historic environment.
3(d) Reduce pollution from any source	√√	√√	√√	Direct and major positive benefits, providing the policy is supported by DC policies and guidance which clearly articulate more specific requirements.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	√√	√√	√√	Direct and major positive benefits. Buildings account for approximately 40% of all CO2 emissions in the UK.
4(b) Improve the District's ability to adapt to climate change	○	○	○	No significant impact.
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	○	○	○	No significant impact.
5(b) Provide access to services and facilities for all	○	○	○	No significant impact.
5(c) Promote community cohesion	○	○	○	No significant impact.
5(d) Increase access to decent and affordable housing	○	○	○	No significant impact.
5(e) Reduce crime rates and fear of crime	○	○	○	No significant impact.
5(f) Improve conditions and services that engender good health and reduce health inequalities	○	○	○	No significant impact.
5(g) Increase participation in education and life-long learning	○	○	○	No significant impact.
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	○	○	○	No significant impact.
<b>RESOURCE USE AND WASTE</b>				



6(a) Use natural resources efficiently; reuse, use recycled where possible	√ √	√ √	√ √	Direct and major positive benefits, providing supporting policies and guidance are effective.
6(b) Reduce waste	√ √	√ √	√ √	Direct and major positive benefits, providing supporting policies and guidance are effective.

#### TOWN CENTRES

7 Promote sustainable urban living	√	√	√	See comments on 2(a).
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#### **Conclusions**

This policy is particularly important because of its potential contribution to addressing key sustainability issues such as climate change, biodiversity and resource efficiency. Although it is recognised that core policies are intentionally broad and strategic, this policy could be strengthened by more clearly articulating its scope. It is understood that the policy is primarily about the impact of development design and construction on the environment. This could be more clearly stated in the policy wording.

Consideration could also be given to further clarifying the scope of the policy through articulating what is meant by 'the environment' since this will be interpreted in various ways. It may be sufficient simply to emphasise the broad scope of the policy, through referring, for example, to 'the local and global environment'. In addition, it may be helpful to provide examples of the more specific objectives of the policy, such as reducing emissions and energy use, promoting biodiversity etc. and cross-referencing to the DC policies addressing these issues.

#### **Uncertainties**

Some local authorities have expressed concern about setting requirements for sustainable design because of potential impacts on developer interest. However, such effects are considered unlikely, providing that the requirements are transparent and can be applied in a consistent fashion, particularly since increasingly stringent requirements are being introduced at the regional level.

#### **Recommendations/mitigation**

Retain the policy but clarify its scope, through explicit reference to design and construction and through articulating what is intended by reference to 'the environment'.

Any (unlikely) negative economic effects of introducing requirements for sustainable design and construction could be mitigated to some extent by maximising the economic opportunities potentially afforded, e.g. promoting the use of the local materials and labour. This is likely to require joint working between the Council's planning and economic development departments, as well as local training providers.

#### **NHDC Response**

This policy is intentionally broad. Whilst design and construction may be significant contributors to environmental impact of new development, they are not the only ones. The policy has deliberately left this issue open to allow consideration of other factors, such as the impact of the proposed use of the building on that location. There is a policy on sustainable materials which encourages local materials. As to local labour, this is not something we can require, so the best we could do is encourage training, as you suggest. However, whether it is appropriate to promote increased local training in construction skills will very much depend on the current labour market, which can change rapidly. As such, we do not think it appropriate to include an explicit reference to local labour in the LDF, especially to address a potential impact which you acknowledge is unlikely.

### **Design Policy D2: House Extensions and Replacement Dwellings**

For house extensions, the Council will normally only permit development proposals if:

1. The extension is sympathetic to the existing house in height, form, proportions, window details and materials; and
2. Pitched roofs are used where appropriate, particularly if the extension is more than the height of a single storey;
3. In isolated rural locations, the extension should not result in a size, scale or design of development which is disproportionate to the scale of the original building or would give the effect of a new dwelling.

Rear extensions should not dominate adjoining property and should be well related to the levels of adjoining properties, the direction the house faces and the distance between the extension and the windows in the next door properties.

Side extensions, at first floor level or above, adjoining a residential plot to the side will normally be refused if less than 1 metre from the boundary.				
For the replacement of dwellings in rural areas, the Council will normally refuse proposals where a materially greater impact would result.				
<i>This new policy was appraised in September 2014</i>				
	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	<b>O</b>	<b>O</b>	<b>O</b>	No significant impact.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	<b>O</b>	<b>O</b>	<b>O</b>	No significant impact.
2(b) Provide access to green spaces	<b>O</b>	<b>O</b>	<b>O</b>	No significant impact.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	<b>O</b>	<b>O</b>	<b>O</b>	No significant impact.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	<b>O</b>	<b>O</b>	<b>O</b>	No significant impact.
3(b) Protect and enhance landscapes	<b>O</b>	<b>O</b>	<b>O</b>	No significant impact.
3(c) Conserve and where appropriate, enhance the historic environment	√	√	√	This policy is likely to protect local character and distinctiveness.
3(d) Reduce pollution from any source	<b>O</b>	<b>O</b>	<b>O</b>	No significant impact.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	<b>O</b>	<b>O</b>	<b>O</b>	No significant impact.
4(b) Improve the District's ability to adapt to climate change	<b>O</b>	<b>O</b>	<b>O</b>	No significant impact.
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	<b>O</b>	<b>O</b>	<b>O</b>	No significant impact.
5(b) Provide access to services and facilities for all	<b>O</b>	<b>O</b>	<b>O</b>	No significant impact.
5(c) Promote community cohesion	?	?	?	Could help guard against proposals which create local discord.
5(d) Increase access to decent and affordable housing	?	?	?	Could result in applications being refused which could have provided additional accommodation space within houses.
5(e) Reduce crime rates and fear of crime	<b>O</b>	<b>O</b>	<b>O</b>	No significant impact.
5(f) Improve conditions and services that engender good health and reduce health inequalities	?	?	?	Could help avoid developments which impact on neighbours' amenity and quality of life.
5(g) Increase participation in education and life-long	<b>O</b>	<b>O</b>	<b>O</b>	No significant impact.

learning				
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	0	0	0	No significant impact.
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	0	0	0	No significant impact.
6(b) Reduce waste	0	0	0	No significant impact.
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	√	√	√	This policy is likely to protect the quality of the public realm in town centres.
<b>Conclusions</b> This policy is likely to contribute to protecting local character and the quality of the public realm.				
<b>Uncertainties</b> The effect of this policy depends on the types of proposals that are brought forward.				
<b>Recommendations/Mitigation</b> None				

<b>Design Policy D3: Protecting living conditions</b>				
The Council will permit development proposals which do not cause unacceptable harm to living conditions. Such harm may arise from, (but not limited to):				
<ol style="list-style-type: none"> <li>1. traffic generation and parking;</li> <li>2. loss of daylight and sunlight;</li> <li>3. noise;</li> <li>4. overlooking;</li> <li>5. pollution (including light pollution); and</li> <li>6. dominance.</li> </ol>				
Where the living conditions of proposed developments would be affected by an existing use, we will consider whether there are mitigation measures that can be taken to mitigate the harm to an acceptable level. If we are not satisfied that mitigation proposals would address the identified harm we will not permit the development proposals.				
<i>An earlier version of this policy was appraised and is shown below.</i>				
	<b>What is predicted effect of the option on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	0	0	0	
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	?	?	?	The policy takes account of issues which may arise from the use of brownfield sites. It is possible it may restrict the use of some sites, but on the other hand it should ensure that the use of brownfield sites is done in the most effective and publicly acceptable way.
2(b) Provide access to green spaces	0	0	0	
2 (c) Deliver more	√	√	√√	See comments above on the use of

sustainable location patterns and reduce the use of motor vehicles				brownfield sites, which are likely to be in urban locations and therefore more accessible to public transport. In addition, the policy will help to reduce the impacts from traffic generation arising from new developments, and therefore could require the developments to mitigate these impacts through measures to reduce car use.
3(a) Protect and enhance biodiversity	0	0	0	
3(b) Protect and enhance landscapes	0	0	0	
3(c) Conserve and where appropriate, enhance the historic environment	0	0	0	
3(d) Reduce pollution from any source	✓	✓	✓✓	The policy will help to avoid and mitigate the impacts on pollution including noise and light pollution.
4(a) Reduce greenhouse gas emissions	0	0	0	
4(b) Improve the District's ability to adapt to climate change	0	0	0	
5(a) Share benefits of prosperity fairly	0	0	0	
5(b) Provide access to services and facilities for all	0	0	0	
5(c) Promote community cohesion	✓	✓	✓	This policy should help new developments to become integrated into existing communities, and reduce resentment arising from the impacts of the new developments.
5(d) Increase access to decent and affordable housing	✓	✓	✓✓	This policy will ensure that new housing development is provided in a manner which takes account of the quality of life of those who will be living there.
5(e) Reduce crime rates and fear of crime	0	0	0	
5(f) Improve conditions and services that engender good health and reduce health inequalities	✓	✓✓	✓✓	Preventing and mitigating noise and other impacts on quality of life of new and existing local residents would have indirect impacts on health.
5(g) Increase participation in education and life-long learning	0	0	0	
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	0	0	0	
6(a) Use natural resources efficiently; reuse, use recycled where possible	0	0	0	
6(b) Reduce waste	0	0	0	
7 Promote sustainable urban living	✓	✓✓	✓✓	The policy will contribute to the quality and attractiveness of developments in towns.
<b>Conclusions:</b>				

- This policy should have significant positive impacts on reducing the use of motor vehicles, reducing noise pollution, improving the quality of new housing, improving health and promoting sustainable urban living.

**Recommendations/Mitigation:**

- No changes recommended

**NHDC Response**

None required

**Design Policy D4: Air Quality**

Where relevant, development proposals must give consideration to the potential or actual impact on local air quality, both during the demolition/ construction phase and as a result of its final occupation and use.

Where required, appropriate air pollution assessments should be carried out to determine the impact on local air quality of the development, otherwise the development may be refused.

Where an air pollution assessment demonstrates an air quality concern it will be expected that appropriate steps are taken to remove or reduce the scale of those concerns. Ideally this will occur at the design, planning and/or development stage, but may in certain circumstances rely on post development mitigation measures.

*The following appraisal of this new policy was undertaken by NHDC in August 2014*

SA Objective: Will the policy...	Score			Justification for assessment and recommendations for Mitigation / recommendation / improvement
	S	M	L	
<i>Economic Activity</i>				
1. Achieve sustainable levels of prosperity and economic growth?	0	0	0	No significant impact.
<i>Land use and development patterns</i>				
2a. Minimise the development of greenfield land and other land with high environmental and amenity value?	?	?	?	Developments that require Air quality assessments are more likely to be located within urban areas. Greenfield sites will have less constraints, unless they are uses that generate concerns..
2b. Provide access to green spaces?	0	0	0	No significant impact.
2c. Deliver more sustainable location patterns and reduce the use of motor vehicles?	1	1	1	Mitigation measures associated with this policy has the potential to deliver low emissions vehicles and car-sharing schemes.
<i>Environmental protection</i>				
3a. Protect and enhance biodiversity?	0	0	0	No significant impact.
3b. Protect and enhance landscapes?	0	0	0	No significant impact.
3c. Conserve and, where appropriate, enhance the historic	0	0	0	No significant impact.

environment?				
3d. Reduce pollution from any source?	1	1	1	The policy will help to avoid and mitigate the impacts of pollution.
<i>Climate change</i>				
4a. Reduce greenhouse gas emissions?	1	1	1	Methods of mitigation include the use of low emissions vehicles.
4b. Improve the district's ability to adapt to climate change?	1	1	1	The methods of mitigation offer opportunities.
<i>A just society</i>				
5a. Share benefits of prosperity fairly?	0	0	0	No significant impact.
5b. Provide access to services and facilities for all?	0	0	0	No significant impact.
5c. Promote community cohesion?	0	0	0	No significant impact.
5d. Increase access to decent and affordable housing?	0	0	0	No significant impact.
5e. Reduce crime rates and fear of crime?	0	0	0	No significant impact.
5f. Improve conditions and services that engender good health and reduce health inequalities?	1	1	1	Preventing and mitigating air pollution will have indirect impacts on health.
5g. Increase participation in education and life-long learning?	0	0	0	No significant impact.
5h. Maintain and improve culture, leisure and recreational activities that are available to all?	0	0	0	No significant impact.
<i>Resource use and waste</i>				
6a. Use natural resources efficiently?	0	0	0	No significant impact.
6b. Reduce waste?	0	0	0	No significant impact.
<i>Town centres</i>				
7. Promote sustainable urban living?	1	1	1	The policy will contribute to the quality and attractiveness of developments in towns.

Mitigation / recommendation	As initially drafted no
Uncertainties	None identified



## Healthy communities

<p><b>Policy HC1: Community, leisure, recreation and cultural facilities</b></p> <p>In development schemes, the Council will expect developers to make provision for new community, cultural, leisure and recreation facilities on or off-site at a scale which is proportionate to the scale of the development. Where on site provision is not appropriate, the Council will seek contributions towards community facilities in accordance with the Planning Obligations Supplementary Planning Document.</p> <p>Development proposals which will result in the loss of community, cultural, leisure or recreation facilities will be resisted unless:</p> <ol style="list-style-type: none"> <li>1. the existing facility can be satisfactorily relocated within the development; or</li> <li>2. the facility is replaced in an appropriate alternative location which is served by sustainable modes of transport; or</li> <li>3. the developer satisfactorily demonstrates that there is no longer a demand for the use of the site or buildings for community, leisure or recreation uses or an appropriate and viable alternative community use; and</li> <li>4. there are no unacceptable impacts on the biodiversity, geodiversity, landscape or ability to enjoy the natural environment.</li> </ol> <p>The Council will encourage new leisure, cultural, community or recreational facilities to be located in accessible locations.</p> <p><i>The policy has been formed by the amalgamation of three earlier policies. The appraisals of these policies are shown below.</i></p>				
<p><b>L1: Loss of existing facilities</b></p> <p>Development proposals which would result in the loss of community facilities will not be permitted unless:</p> <ol style="list-style-type: none"> <li>A. the existing facility can be satisfactorily relocated within the development; or</li> <li>B. the facility is replaced in an appropriate alternative location which is served by a choice of means of transport; or</li> <li>C. it can be demonstrated that there is no longer a demand for the use of the site or buildings for community uses or an appropriate and viable alternative community use.</li> </ol>				
	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	<b>O.</b>	<b>O.</b>	<b>O.</b>	
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	?	?	?	In terms of Greenfield protection, whilst the policy deals with protecting community facilities, the policy may allow development to displace these facilities and in turn, relocate them.
2(b) Provide access to green spaces	<b>O.</b>	<b>O.</b>	<b>O.</b>	It is assumed that this policy does not deal with green spaces.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√	√	√	The policy will help protect and promote local and accessible facilities. However, it would be strengthened by requiring replacement facilities to be in equally accessible locations.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	<b>O.</b>	<b>O.</b>	<b>O.</b>	It is assumed that this policy does not deal with green spaces.
3(b) Protect and enhance	<b>O.</b>	<b>O.</b>	<b>O.</b>	



landscapes				
3(c) Conserve and where appropriate, enhance the historic environment	0.	0.	0.	
3(d) Reduce pollution from any source	0.	0.	0.	
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	√	√	√	The policy will help protect and promote local and accessible facilities
4(b) Improve the District's ability to adapt to climate change	0.	0.	0.	
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	0.	0.	0.	No significant impact- Local jobs for local people may be safeguarded, depending upon the type of facility. Conversely, where a facility is deemed obsolete, there may be job losses.
5(b) Provide access to services and facilities for all	√	√	√ √	The policy promotes preservation of community facilities for the benefit of local people. However it should be more specific in clause C how the lack of need for a facility is demonstrated, for example, by undertaking a neighbourhood facilities audit/public consultation).
5(c) Promote community cohesion	√	√	√ √	See comments above.
5(d) Increase access to decent and affordable housing	0.	0.	0.	No significant impact.
5(e) Reduce crime rates and fear of crime	?	?	?	Retention of community facilities may provide access to learning and recreation (particularly to disengaged youths), which may assist in reducing anti-social behaviour on the streets.
5(f) Improve conditions and services that engender good health and reduce health inequalities	√	√	√ √	The policy promotes retention of community facilities- dependent on type of facility, this may have beneficial health impacts for those using them. Furthermore, ensuring that facilities are accessible to all in a local community by sustainable transport links, particularly walking and cycling, will also have positive health impacts.
5(g) Increase participation in education and life-long learning	0.	0.	0.	Dependent on facility, there may be potential for increased participation (for example, multi-purpose community centres may incorporate training functions).
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	√	√	√ √	The policy deals directly with maintenance and retention of community facilities that serve very local communities which could have a positive benefit here.
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	0.	0.	0.	
6(b) Reduce waste	0.	0.	0.	
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	√	√	√	Would help preserve facilities in town centres.
<b>Conclusions</b>				

The policy deals directly with maintenance and retention of community facilities that serve very local communities, which could have a positive benefit here in terms of reducing social inequalities and social cohesion.

Dependent upon facility type, there is potential to address a wealth of needs across a variety of agendas such as health and well being; and skills and life-long learning; and crime and reducing the fear of crime; and recreation, leisure and culture.

In terms of Greenfield protection, whilst the policy deals with protecting community facilities, the policy may allow development to displace these facilities and in turn, relocate them.

**Uncertainties**

No significant uncertainties identified.

**Recommendations/Mitigation:**

A community facility has a wide range of meaning and the policy needs to be more explicit in what constitutes a community facility (and list typical examples of facilities within the area).

The policy should be more specific in clause C on how the lack of need for a facility is demonstrated, for example, by undertaking a neighbourhood facilities audit/public consultation

The policy would be strengthened by requiring replacement facilities to be in equally accessible locations.

**NHDC Response**

Amend the policy in response to CAG’s recommendations as follows:

1. the supporting text for the policy will be amended to include examples of the types of community facilities which would be protected by the policy;
2. it is intended that any community facility would be replaced within a development scheme and would be subject to the whole scheme being acceptable with other policies in the plan;
3. delete a “choice of means of transport” and replace with “sustainable modes of transport; and
4. criteria C states that it should be demonstrated that there is no longer a demand for the facility and that the site or buildings would not be viable for another community use. The Council would expect the developer to provide evidence to support the case that the site or building could be redeveloped for another use. Examples of evidence could include residents surveys, usage statistics, waiting lists. The criteria has been amended to make it clear that it should be the developer to provide the relevant evidence to support any proposal for the reuse or redevelopment of the site or buildings.

The amended policy would read as follows:

Development proposals which would result in the loss of community facilities will not be permitted unless:

- A. the existing facility can be satisfactorily relocated within the development; or
- B. the facility is replaced in an appropriate alternative location which is served by sustainable modes of transport; or

it can be demonstrated by the developer that there is no longer a demand for the use of the site or buildings for community uses or an appropriate and viable alternative community use.

**L2: New facilities**

It is expected that in new developments, community facilities will be provided at a scale which is proportionate to the scale of development.

Development proposals for new or improved community facilities will be permitted subject to the following criteria:

- A. the facility is located within the built area of the settlement and is accessible by passenger transport, cycling and walking; and
- B. parking is provided in accordance with the Council’s current parking standards; and
- C. the acceptability of the design of the new facility and the impact on the character of the surrounding area.

SA Objectives	What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement
	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	O.	O.	O.	
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and	√	√	√	Requires development to be within built up area of settlement.

amenity value?				
2(b) Provide access to green spaces	<b>O.</b>	<b>O.</b>	<b>O.</b>	It is assumed that it doent cover green spaces, but this needs to be clarified by the policy.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√	√	√	Requires facilities to be accessible by public transport, walking and cycling.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	?	?	?	Depends on location. ,
3(b) Protect and enhance landscapes	<b>O.</b>	<b>O.</b>	<b>O.</b>	
3(c) Conserve and where appropriate, enhance the historic environment	?	?	?	Refer to comments in 3 (a)
3(d) Reduce pollution from any source	√	√	√	Requires facilities to be accessible by public transport, walking and cycling, and should therefore help reduce pollution from motor vehicles..
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	√	√	√	Refer to comments raised above.
4(b) Improve the District's ability to adapt to climate change	?	?	?	Depends on location.
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	?	?	?	Depends on location.
5(b) Provide access to services and facilities for all	√	√	√√	The policy promotes development of new facilities, in accessible locations. This impact will be maximised when implemented with the related Development Policies and the Planning Obligations SPD, as well as public consultation/facilities auditing.
5(c) Promote community cohesion	√	√	√√	See comments above
5(d) Increase access to decent and affordable housing	<b>O.</b>	<b>O.</b>	<b>O.</b>	No significant impact.
5(e) Reduce crime rates and fear of crime	?	?	?	New community facilities may provide access to learning and recreation (particularly to disengaged youths), which may assist in reducing anti-social behaviour on the streets.
5(f) Improve conditions and services that engender good health and reduce health inequalities	√	√	√√	This will be dependent on type of facility, this may have beneficial health impacts over the medium term for those using them. Furthermore, ensuring that facilities are accessible to all in a local community by sustainable transport links, particularly walking and cycling, will also have positive health impacts.
5(g) Increase participation in education and life-long learning	√	√	√	Dependent on facility, there may be potential for increased participation (for example, multi-purpose community centres may incorporate training functions and employment advice).
5(h) Maintain and improve culture, leisure and recreational activities that	√	√	√	The policy deals directly with provision of community facilities that serve very local communities, which could have a positive

are available to all				benefit here (in terms of one or all of these issues).
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	?	?	?	Depends on nature of facility.
6(b) Reduce waste	?	?	?	Refer to comments above.
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	√	√	√	Should lead to new facilities accessible from town centres.
<p><b>Conclusions</b>  The policy deals directly with the development and provision of community facilities in new developments that serve very local communities, which could have a positive benefit here in terms of reducing social inequalities and social cohesion.  Dependent upon facility type, there is potential to address a wealth of needs across a variety of agendas such as health and well being; skills and life-long learning; crime and reducing the fear of crime; and recreation, leisure and culture.  There may be potential for developers to fund or part fund capital and revenue costs of community facilities (particularly where any have been displaced as a result of new development).</p> <p><b>Uncertainties</b>  No significant uncertainties identified.</p> <p><b>Recommendations/Mitigation:</b>  As in L1, the policy would benefit from a clarification of what community facilities are likely to be.</p> <p><b>NHDC Response</b>  Amend policy in response to CAG's recommendations as follows:</p> <ol style="list-style-type: none"> <li>the supporting text for the policy will be amended to include examples of the types of community facilities which would be protected by the policy;</li> <li>delete the reference to passenger transport, cycling and walking and replace with "sustainable modes of transport";</li> <li>delete the reference to current parking standards and replace with a reference to Policy T7 of this plan. It is considered that some vehicle parking may be appropriate for new community facilities, despite their accessible location. This is because there tends to be a reduced number of evening public transport services but the use of a community facility would not be similarly constrained during the evening.</li> </ol> <p>The amended policy will read:  It is expected that in new developments, community facilities will be provided at a scale which is proportionate to the scale of development.  Development proposals for new or improved community facilities will be permitted subject to the following criteria:</p> <ol style="list-style-type: none"> <li>the facility is located within the built area of the settlement and is accessible by sustainable modes of transport; and</li> <li>vehicle parking is provided in accordance with Policy T7 of this plan; and</li> </ol> <p>the acceptability of the design of the new facility and the impact on the character of the surrounding area.</p>				
<p><b>L5: Built sport and recreational facilities</b></p> <p>The Council will not permit development proposals which would result in the loss of sport, recreational and cultural facilities unless it can be demonstrated that</p> <ul style="list-style-type: none"> <li>there is no demand for the recreational use of the site; or</li> <li>there is no harm to the character of the settlement; or</li> <li>a deficiency would not be created through its loss; or</li> <li>acceptable replacement provision is made elsewhere in an accessible location.</li> </ul> <p>Proposals for new built leisure, recreation or cultural facilities should be in locations which are:</p> <ul style="list-style-type: none"> <li>accessible by a choice of means of transport;</li> <li>where there is no unacceptable environmental impact; and</li> <li>which does not take land designated for other uses.</li> </ul>				
	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	

<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	√	√	√	Recreation and sports facilities may increase visitors and in turn, boost the local economy in the medium to longer term. Jobs may be safeguarded and new ones created with the retention of these facilities; development of new facilities; and the intensification of existing facilities.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	?	?	?	Depends on location of new facilities
2(b) Provide access to green spaces	0.	0.	0.	Policy relates to built facilities
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√	√	√	Policy should have a positive impact as it requires new facilities to be accessible by a variety of means of transport. It would be strengthened by requiring facilities to be accessible by walking, cycling and public transport.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	?	?	?	Depends on location of new facilities.
3(b) Protect and enhance landscapes	?	?	?	See comments above.
3(c) Conserve and where appropriate, enhance the historic environment	?	?	?	See comments in 3 (a).
3(d) Reduce pollution from any source	?	?	?	It will be important to ensure that all larger facilities are linked to the public transport network and are accessible by other sustainable transport modes- improved cycle routes and footpaths. This will decrease harmful particulate and GHG emissions associated with the use of private cars.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	?	?	?	Refer to comments raised above.
4(b) Improve the District's ability to adapt to climate change	?	?	?	Depends on location
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	√	√	√	Jobs may be safeguarded and new ones created with the retention of these facilities; development of new facilities; and the intensification of existing facilities.
5(b) Provide access to services and facilities for all	√	√	√ √	The policy promotes preservation of sports and recreational facilities for the benefit of local people. The policy should be more explicit about how demand for facilities will be assessed (e.g. from the results of a neighbourhood facilities audit/public consultation).
5(c) Promote community cohesion	0.	0.	0.	
5(d) Increase access to decent and affordable housing	0.	0.	0.	No significant impact.
5(e) Reduce crime rates	?	?	?	Retention and provision of new sports and

and fear of crime				recreation facilities may help in reducing anti-social behaviour on the streets. (Refer to 5 c).
5(f) Improve conditions and services that engender good health and reduce health inequalities	√	√	√ √	The policy directly promotes the provision of sports facilities and open space for exercise and in turn health benefits to all. When realised with relevant transport policy, walking and cycling and the provision of footpaths and cycleways/bridleways to community facilities will also have positive health impact.
5(g) Increase participation in education and life-long learning	0.	0.	0.	No significant impact.
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	√	√	√	The policy directly supports the protection of recreational leisure facilities.
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	?	?	?	Depends on nature of new facilities
6(b) Reduce waste	?	?	?	Refer to comments above.
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	0.	√	√	The policy supports the protection of all sports facilities- the protection of facilities in urban areas will preserve the diversity and choice of services available in these areas, reduce the need to travel and in turn, assist in sustaining urban communities.
<p><b>Conclusions</b></p> <p>There is potential for community facilities to reduce social inequalities, for example, engaging harder to reach youngsters in sports. Retention of sports and recreation facilities may help in reducing anti-social behaviour on the streets. (Refer to 5 c).</p> <p>Potential negative effects of the proposals relate to an erosion of landscape character, biodiversity, archaeology and heritage where there is intensification of activity; and new sites sports/recreational facilities are required where there has been an assessment of future need and demand e.g. as part Sports Facilities or Playing Pitch Strategies or as part of future demand based on predicted housing and employment land allocations within parts of the area.</p> <p>It will be important to ensure that all larger facilities are linked to the public transport network and are accessible by other sustainable transport modes- improved cycle routes and footpaths. This will decrease harmful particulate and GHG emissions associated with the use of private cars.</p> <p><b>Uncertainties:</b></p> <p>A number of impacts depend on the type and location of development.</p> <p><b>Recommendations/Mitigation:</b></p> <p>The policy could be strengthened by requiring that replacement facilities be in 'equally accessible' locations as the facilities they are replacing. In addition, the policy should promote locations which are accessible by sustainable modes of transport.</p> <p><b>NHDC Response</b></p> <p>Amend policy in line with CAG's recommendations to read:</p> <p>The Council will not permit development proposals which would result in the loss of sport, recreational and cultural facilities unless it can be demonstrated that</p> <p>A. there is no demand for the recreational use of the site; or</p> <p>B. there is no harm to the character of the settlement; or</p> <p>C. a deficiency would not be created through its loss; or</p> <p>D. acceptable replacement provision is made elsewhere in an equally accessible location.</p> <p>Proposals for new built leisure, recreation or cultural facilities should be in locations which are:</p> <p>A. accessible by sustainable modes of transport;</p> <p>B. where there is no unacceptable environmental impact; and</p> <p>which does not take land designated for other uses.</p>				

## Policy HC2: Green space

Public and private green spaces will be retained by:

1. refusing development proposals which would have a detrimental effect on the character, extent and structure of the green space pattern; and
2. requiring development proposals, through their character, form, layout, design and green space provision to retain and/or improve the pattern; and
3. encouraging links between spaces within towns and between those spaces and the surrounding countryside.

In all new residential developments an appropriate amount of public green space must be provided. The green space should be useable, accessible, appropriately equipped and designed and a management programme agreed for its future maintenance.

In all new residential developments the following minimum standards for the provision of green space will be applied:

### Larger developments (over 540 dwellings):

Type	Standard hectares per 1,000 people
Green Space	2.24
Equipped Play and Youth	0.20
Allotments	0.23
Outdoor Sports	1.42

The Council will work with developers to determine the appropriate layout, types and long term management of provision through the master-planning process. This will take into account the projects identified in the Council's latest Green Space Strategy and other Council studies to be undertaken in accordance with Sport England Guidance.

Applicants using the following policy are also advised to have regard to policy NE2 Green Infrastructure.

### Smaller developments (Under 540 dwellings):

Type	Threshold at which provision sought	Standard hectares per 1,000 people
Green Space	All scales of development	1.13
Equipped Play and Youth	Local Area for Play (LAP) - 21 dwellings	0.20
	Local Equipped Area for Play (LEAP) - 83 dwellings	
	Neighbourhood Equipped Area for Play (NEAP) - 208 dwellings	

*The policy has been formed by the amalgamation of three earlier policies. The appraisals of these policies are shown below.*

### L3: Loss of existing open spaces

Development proposals which would result in the loss of existing open spaces will not be permitted unless:

- A. alternative provision of the open space can satisfactorily be made for the catchment area served by the open space in an accessible location served by a choice of means of transport;
- B. the proposal is ancillary to an existing leisure use serving the catchment area;
- C. a deficiency of open space would not be created through its loss;
- D. it can be demonstrated that the users would benefit more from the improvement of the facilities on the open space despite a loss of part of the site.

	What is the predicted effect on each SA objective?	Justification for assessment and recommendations for mitigation/improvement

<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	√	√	√	There is potential for the preservation of open spaces as visitor attractions and hence contributing to the tourism economy.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	O.	O.	O.	
2(b) Provide access to green spaces	√	√	√	The policy performs well, in promoting a net gain in open spaces for amenity, recreational and leisure value, particularly for local communities..
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√	√	√	The policy protects the provision of open space, but it would be strengthened by requiring alternatives to be equally accessible by walking cycling and public transport.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	√	√	√	Preservation of open space can have a positive impact in safeguarding and enhancing biodiversity and landscape.
3(b) Protect and enhance landscapes	√	√	√	See comments above.
3(c) Conserve and where appropriate, enhance the historic environment	?	?	?	Some open spaces may have a historic value.
3(d) Reduce pollution from any source	√	√	√	The policy is concerned with retaining open spaces within local communities, which should reduce the need to travel and hence, avoid the adverse health and climatic impacts associated with motor vehicles.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	√	√	√	See comments raised above.
4(b) Improve the District's ability to adapt to climate change	√	√	√	Open spaces have a positive role in reducing flooding.
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	O.	O.	O.	No significant impact.
5(b) Provide access to services and facilities for all	√	√	√	The policy is predominantly concerned with preserving community facilities for recreation and amenity purposes for local people.
5(c) Promote community cohesion	√	√	√	Refer to comments above.
5(d) Increase access to decent and affordable housing	O.	O.	O.	No significant impact.
5(e) Reduce crime rates and fear of crime	?	?	?	An increase in sports pitches and other open spaces will provide access to leisure facilities and may assist in reducing anti-social behaviour, particularly amongst youths, on the streets.
5(f) Improve conditions	√	√	√	The policy will assist in promoting exercise



and services that engender good health and reduce health inequalities				and healthy lifestyles, which could be maximised if the benefits of access to these areas by sustainable modes of transport was emphasised more in the policy.
5(g) Increase participation in education and life-long learning	0.	0.	0.	No significant impact, although parks and other green spaces may be used by schools for learning opportunities, e.g. ecology and biodiversity; biology.
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	√	√	√	The policy directly supports the preservation of open spaces for recreation and amenity purposes for local communities.
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	0.	0.	0.	No significant impact.
6(b) Reduce waste	0.	0.	0.	There may be potential for the installation of recycling receptacles at the larger sites.
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	?	?	?	Open spaces will be in short supply in urban areas and as such, there will be a greater need to preserve open space /provide new open space- it is presumed that this will be covered in the yet to be adopted Green Space Strategy.
<p><b>Conclusions</b>  The policy performs well, particularly from a health and well being point of view in promoting a net gain in green spaces.  The policy directly supports the preservation of open spaces for recreation and amenity purposes for the benefit of local communities.  An increase in sports pitches and community facilities will provide access to leisure facilities and may assist in reducing anti-social behaviour, particularly amongst youths, on the streets.</p> <p><b>Uncertainties:</b>  Open spaces will be in shortage in urban areas and as such, a greater need to preserve open space /provide new open space- it is presumed that this will be covered in the yet to be adopted Green Space Strategy.</p> <p><b>Recommendation /Mitigation:</b>  The policy would be strengthened by requiring alternatives to be equally accessible by walking cycling and public transport.</p> <p><b>NHDC Response</b>  Amend policy in response to CAG's recommendations to read:  Development proposals which would result in the loss of existing open spaces will not be permitted unless:  A. alternative provision of the open space can satisfactorily be made for the catchment area served by the open space in an accessible location served by a choice of sustainable modes of transport;  B. the proposal is ancillary to an existing leisure use serving the catchment area;  C. a deficiency of open space would not be created through its loss;  it can be demonstrated that the users would benefit more from the improvement of the facilities on the open space despite a loss of part of the site.</p>				
<p><b>L4: Provision of open space in new development</b>  In all new residential developments an appropriate amount of public open space will be provided in accordance with local standards identified in the Green Space Strategy.  Until the Green Space Strategy has been adopted by the Council, the following standards for the provision of open space in new developments will be applied:  Informal open space – 0.4 hectares per 1000 population (NPFA standard)  Children's play space – up to 0.8 hectares per 1000 population (NPFA standard)  Playing pitches – 1.2 hectares per 1000 population (local standard)  Outdoor sport – 1.6 hectares per 1000 population (local standard)  In new developments, open space should be useable, accessible, appropriately equipped and designed.</p>				

In some circumstances where there are existing facilities near to the development or where the provision of open space is not feasible, it may be more appropriate to seek a contribution towards the improvement of the existing facility.				
	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	O.	O.	O.	
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	?	?	?	Uncertain impact- this will be dependent upon the location of new development and in accordance with LDF policy and relevant SPDs.
2(b) Provide access to green spaces	√	√	√	New open spaces will be located within new developments and as such, should be highly accessible to local communities by foot and bicycle and in turn, be less harmful to the environment.  Large facilities should be sited in close proximity to the public transport network and the policy should pay attention to this accordingly.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√	√	√	Refer to comments made above.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	?	?	?	Uncertain- This is dependent upon the nature and scale of development. It may be that a pre-existing site is being preserved for it's wildlife and biodiversity value, hence it will have a positive impact on biodiversity. Where certain open areas have been displaced by development, new ones may be created along with new habitats. However, a new development (including the provision of open space) may compromise biodiversity and result in landscape erosion e.g. development of a large play area, or formal sports pitch
3(b) Protect and enhance landscapes	?	?	?	Refer to comments above.
3(c) Conserve and where appropriate, enhance the historic environment	?	?	?	Refer to comments in 3 (a)- this will be dependent upon location of development.
3(d) Reduce pollution from any source	?	?	?	It will be important to ensure that all larger facilities are linked to the public transport network and are accessible by other sustainable transport modes- improved cycle routes and footpaths. This will decrease harmful particulate and GHG emissions associated with the use of private cars.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	?	?	?	Refer to comments raised above.
4(b) Improve the District's ability to adapt to climate	?	?	?	The retention of open spaces may contribute to sustainable drainage systems

change				and assist in protecting groundwater, provided they are not paved..
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	○.	○.	○.	
5(b) Provide access to services and facilities for all	√	√	√	The policy promotes preservation of community facilities for the benefit of local people. In terms of access, refer to 2 (b).
5(c) Promote community cohesion	○.	○.	○.	
5(d) Increase access to decent and affordable housing	○.	○.	○.	No significant impact.
5(e) Reduce crime rates and fear of crime	○.	?.	?.	An increase in recreational facilities will provide better access to leisure facilities and may assist in reducing anti-social behaviour, particularly from youths, on the streets.
5(f) Improve conditions and services that engender good health and reduce health inequalities	○.	○.	○.	The policy directly promotes the provision of open space for exercise which will have direct health benefits for those choosing to use them.  When realised with relevant transport policy, walking and cycling and the provision of footpaths and cycleways/bridleways to these areas, this will also have positive health impact.
5(g) Increase participation in education and life-long learning	○.	○.	○.	No significant impact, although parks and other green spaces may be used by schools for learning opportunities, e.g. ecology and biology field trips.
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	√	√	√	The policy directly supports the preservation of open spaces for recreation and amenity purposes for local communities.
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	?	?	?	The retention of open spaces may contribute to sustainable drainage systems and assist in protecting groundwater.
6(b) Reduce waste	○.	○.	○.	Refer to comments above.
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	○.	○.	○.	
<p><b>Conclusions</b>  Provision of open spaces will have positive health and well being impacts, particularly for the local communities they serve.  New open spaces will be located within new developments and as such, should be highly accessible to local communities by foot and bicycle and in turn, be less harmful to the environment.  The retention of open spaces may contribute to sustainable drainage systems and assist in protecting groundwater.</p> <p><b>Uncertainties:</b>  The minimisation of greenfield land development is uncertain, this will be dependent upon the location of new development and in accordance with LDF policy and relevant SPDs.  In terms of protecting and enhancing biodiversity this is dependent upon the nature and scale of development. It may be that a pre-existing site is being preserved for its wildlife and biodiversity value, hence it will impact positively here. Where certain open areas have been displaced by development, new ones may be created along with new habitats. However, a new development (including the provision of open space) may compromise biodiversity and result in landscape</p>				

erosion e.g. development of a large play area, or formal sports pitch.				
<b>Recommendations/Mitigation:</b>				
The policy should require large facilities to be accessible by public transport, walking and cycling.				
<b>NHDC Response</b>				
Amend policy to take account of CAG's recommendations to read:				
In all new residential developments an appropriate amount of public open space will be provided in accordance with local standards identified in the Green Space Strategy.				
Until the Green Space Strategy has been adopted by the Council, the following standards for the provision of open space in new developments will be applied:				
Informal open space – 0.4 hectares per 1000 population (NPFA standard)				
Children's play space – up to 0.8 hectares per 1000 population (NPFA standard)				
Playing pitches – 1.2 hectares per 1000 population (local standard)				
Outdoor sport – 1.6 hectares per 1000 population (local standard)				
In new developments, open space should be useable, accessible, in close proximity to public transport and be appropriately equipped and designed.				
In some circumstances where there are existing facilities near to the development or where the provision of open space is not feasible, it may be more appropriate to seek a contribution towards the improvement of the existing facility.				
<b>E10: Open space pattern within towns</b>				
Within the towns of Baldock, Hitchin, Letchworth and Royston, the pattern of public and private open spaces will be retained by:				
a. refusing development proposals which would have a detrimental effect on the character, extent and structure of the open space pattern; and				
b. requiring development proposals, through their character, form layout, design and open space provision to retain and/or improve the pattern; and				
c. encouraging links between spaces within the towns and between those spaces and the surrounding countryside.				
	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	?	?	?	Some developments with economic benefits may be refused if they compromise the open space pattern with towns.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	√	√	√	The policy offers protection to open spaces.
2(b) Provide access to green spaces	√	√	√	The policy offers protection to the character, structure and extent of open spaces, as well as encouraging links between open spaces and the wider countryside. The supporting text for this policy refers to the public support for an Urban Character Study but it is unclear whether such a study has been carried out. If so, or if there are plans to develop such a study, the policy would be strengthened by direct reference to it. Otherwise the policy will be left more open to subjective interpretation.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	?	?	?	The protection of open spaces within towns may restrict the level of development which is possible within existing towns.
<b>ENVIRONMENTAL PROTECTION</b>				

3(a) Protect and enhance biodiversity	√	√	√	Protecting open spaces will benefit the natural habitats supported in those open spaces. In addition, the encouragement of links between open spaces and the wider countryside may provide important wildlife corridors.
3(b) Protect and enhance landscapes	√	√	√	The policy will help to protect landscapes where they form part of the open space pattern within towns.
3(c) Conserve and where appropriate, enhance the historic environment	√	√	√	The policy protects the character, extent and structure of open space pattern within towns, which will be an important aspect of the historic character of these settlements.
3(d) Reduce pollution from any source	○	○	○	No significant impact
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	○	○	○	No significant impact
4(b) Improve the District's ability to adapt to climate change	○	○	○	No significant impact
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	○	○	○	No significant impact
5(b) Provide access to services and facilities for all	√	√	√	The policy will help to promote access to open spaces within towns.
5(c) Promote community cohesion	√	√	√	The policy will help to preserve the character of the towns in the District, which should contribute to increasing a sense of belonging and local identity.
5(d) Increase access to decent and affordable housing	?	?	?	The protection of open spaces within towns may restrict the level of development which is possible within existing towns.
5(e) Reduce crime rates and fear of crime	○	○	○	No significant impact
5(f) Improve conditions and services that engender good health and reduce health inequalities	√	√	√	The policy will help to protect open spaces which may have health benefits for users
5(g) Increase participation in education and life-long learning	○	○	○	No significant impact
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	√	√	√	The policy will help to protect access to open spaces and to the surrounding countryside.
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	○	○	○	No significant impact
6(b) Reduce waste	○	○	○	No significant impact
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	?	?	?	The protection of open spaces within towns may restrict the level of development which is possible within existing towns.
<b>Conclusions</b>				
It has not been possible to assess the potential effects of this policy on the levels of development which would be possible within towns. The Council will need to be satisfied that the policy is consistent with the levels of development, particularly housing development, proposed by the LDF. In terms of the beneficial effects on other sustainability objectives, it is unclear whether the Urban Character Study referred to in the supporting text has been carried out or not. If it has, or				

if there are plans to develop such a study, the policy would be strengthened by direct reference to it. Otherwise the policy will be left more open to subjective interpretation.

**Uncertainties**

See above.

**Recommendations/Mitigation**

If an Urban Character Study has been, or will be, carried out, the policy should make direct reference to it.

The Council will need to be satisfied that the policy is consistent with the levels of development, particularly housing development, proposed by the LDF.

**NHDC Response**

In response to CAG’s recommendations, amend the supporting text to the policy to highlight that the Council is planning to undertake an Urban Design Assessment which will help to define the open space pattern within the towns.

The supporting text would therefore read as follows:

“The policy is based upon the existing adopted local plan policy and aims to not only protect the existing patterns of open space but also where new development proposals are put forward they should include proposals to create new open spaces. This is particularly important where new developments are built on previously developed land within the existing built up areas. The Council is planning to undertake an Urban Design Assessment which will help to define the existing pattern of open space within the towns and how new developments should retain or improve those patterns of open space.”

## Natural environment

**Natural Environment Policy NE1: Landscape and Environmental Protection**

The quality and character of the natural environment will be protected and enhanced. Development proposals should complement the character of the surrounding landscape and respect locally sensitive features as identified in the North Herts Landscape Study and the Chilterns AONB Management Plan. Proposals should provide high standards of built, landscape and environmental design in support of the development and landscape management guidelines provided for each landscape character area.

Development proposals that would be detrimental to the natural environment will be refused where suitable mitigation measures cannot satisfactorily address the adverse impact.

*This policy was created by merging three earlier policies. The appraisals of the earlier versions are shown below.*

**A Environmental protection**

The quality and character of the historic and natural environment will be protected or enhanced. Development proposals that would be unacceptably detrimental to the historic environment and the local and global natural environment will not be permitted.

SA Objectives	What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement
	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	√	√	√	The quality of the local historic and natural environment contributes to sustainable tourism in the District.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	√	√	√	Protecting the natural environment is also likely to help minimise greenfield development.

2(b) Provide access to green spaces	√	√	√	Protecting the natural environment will protect and potential enhance opportunities for contact with nature.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√	√	√	Protecting the natural environment is likely to encourage development in accessible locations.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	√	√	√√	The policy is a strategic level protection for biodiversity. However, the original version of this policy simply referred to "proposals that would be detrimental." This has now been weakened to say "unacceptably detrimental" which undermines the principle of protecting the natural environment.
3(b) Protect and enhance landscapes	√	√	√√	Landscape is an element of the natural environment. See comments under 3(a)
3(c) Conserve and where appropriate, enhance the historic environment	√	√	√√	The policy is a strategic level protection for the historic environment. See comments under 3(a)
3(d) Reduce pollution from any source	√	√	√√	Reducing pollution is one element of protecting the natural environment.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	?	?	?	Could encourage more sustainable location of development which would have an impact on emissions.
4(b) Improve the District's ability to adapt to climate change	?	?	?	Protecting the natural environment could help reduce flooding.
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	0	0	0	No significant impact
5(b) Provide access to services and facilities for all	0	0	0	No significant impact
5(c) Promote community cohesion	0	0	0	No significant impact
5(d) Increase access to decent and affordable housing	0	0	0	No significant impact
5(e) Reduce crime rates and fear of crime	0	0	0	No significant impact
5(f) Improve conditions and services that engender good health and reduce health inequalities	0	0	0	No significant impact
5(g) Increase participation in education and life-long learning	0	0	0	No significant impact
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	√	√	√	Policy will safeguard the historic and natural environment and the leisure and cultural benefits it delivers to local people
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	0	0	0	No significant impact
6(b) Reduce waste	0	0	0	No significant impact
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	√	√	√	The historic environment is an element of the quality of the public realm
<b>Conclusions</b>				

The policy is a strategic level protection for the natural and historic environment. However, the original version of this policy simply referred to "proposals that would be detrimental." This has now been weakened to say "unacceptably detrimental" which undermines the principle of protecting the natural and historic environment.

**Uncertainties**

None identified

**Recommendations/Mitigation**

Remove the word "unacceptably" from the policy wording.

**NHDC Response**

Agree to remove "unacceptably" from the policy wording to strengthen the policy.

**E7: Chilterns Area of Outstanding Natural Beauty**

The Council will conserve and enhance the natural beauty of the Chilterns AONB, by ensuring that where development is permitted it is carefully sited and is of high quality design. Any provision for leisure activities must be compatible with existing land uses and landscape conservation. In addition, account will be taken of the effect on farming and woodland land uses and wildlife conservation interests.

SA Objectives	What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement
	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	√	√	√	Should support tourism, particularly through allowing leisure development where appropriate.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	√	√	√	Will specifically protect Chilterns AONB area.
2(b) Provide access to green spaces	√	√	√	Will help protect Chilterns AONB and allow new leisure activities where appropriate.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	○	○	○	No significant impact
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	√	√	√	Will help to protect biodiversity within Chilterns AONB, although the policy wording could be strengthened, e.g. at the end of the first sentence, adding 'which minimises the impact on the natural environment'.
3(b) Protect and enhance landscapes	√	√	√	Will help to landscapes within Chilterns AONB.
3(c) Conserve and where appropriate, enhance the historic environment	○	○	○	No significant impact
3(d) Reduce pollution from any source	√	√	√	Will help to prevent development which might pollute the environment in Chilterns AONB although revised policy wording as in comments on 3(a) would strengthen this protection.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	○	○	○	No significant impact
4(b) Improve the District's ability to adapt to climate change	○	○	○	No significant impact
<b>A JUST SOCIETY</b>				



5(a) Share benefits of prosperity fairly	0	0	0	No significant impact, although there may be some benefits in terms of employment in rural tourism-related activities
5(b) Provide access to services and facilities for all	0	0	0	No significant impact
5(c) Promote community cohesion	0	0	0	No significant impact
5(d) Increase access to decent and affordable housing	0	0	0	No significant impact
5(e) Reduce crime rates and fear of crime	0	0	0	No significant impact
5(f) Improve conditions and services that engender good health and reduce health inequalities	0	0	0	No significant impact
5(g) Increase participation in education and life-long learning	0	0	0	No significant impact
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	0	0	0	No significant impact
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	0	0	0	No significant impact
6(b) Reduce waste	0	0	0	No significant impact
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	0	0	0	No significant impact
<p><b>Conclusions</b>  This policy would provide protection for the natural environment in the Chilterns AONB and may have indirect positive effects in terms of promoting rural tourism. A minor revision of the policy wording may serve to strengthen the policy's protection of the natural environment, whilst consideration should also be given to other landscapes of high amenity and recreational value which are not within the Chilterns AONB and may be missed by policy E11, which focuses mainly on landscape character rather than amenity or recreational value.</p> <p><b>Uncertainties</b>  No significant uncertainties identified.</p> <p><b>Recommendations/Mitigation</b>  The policy wording should be slightly revised so as to strengthen protection of the natural environment, including biodiversity, water and air quality etc. For example, the first sentence could end '<i>..of high quality design which minimises the impact on the natural environment</i>'. Consideration should be given to other landscapes of high amenity and recreational value which are not within the Chilterns AONB and may be missed by policy E11, which focuses mainly on landscape character rather than amenity or recreational value. This may be best addressed through revising the wording of policy E11.</p> <p><b>NHDC Response</b>  In response to CAG's recommendations, amend the first sentence of the policy to read:  "The Council will conserve and enhance the natural beauty of the Chilterns AONB, by ensuring that where development is permitted it is carefully sited and is of high quality design <u>which minimises the impact on the natural environment</u>."  The wording to Policy E11 has also been amended.</p>				
<p><b>E11: Protecting landscapes</b>  The landscape character of North Hertfordshire should be protected, enhanced or improved by development proposals as a result of their design, appearance and landscape schemes.  Developments should complement the character of the surrounding landscape, as identified in the Landscape Character Assessment Study.</p>				
	<b>What is the</b>		<b>Justification for assessment and</b>	

SA Objectives	predicted effect on each SA objective?			recommendations for mitigation/improvement
	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	0	0	0	The policy is framed to address the design and appearance of developments rather than to question whether development should proceed in some locations at all, which means it should not restrict economic development significantly. There may be some benefits in terms of tourism from seeking to protect landscapes.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	0	0	0	The policy is framed to address the design and appearance of developments rather than to question whether development should proceed in some locations at all. It therefore offers rather limited protection to Greenfield and other high value land.
2(b) Provide access to green spaces	0	0	0	No significant impact
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	0	0	0	No significant impact
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	0	0	0	No significant impact
3(b) Protect and enhance landscapes	√	√	√	The policy seeks the protection or enhancement of the landscape of the District. However, the policy is framed to address the design and appearance of developments rather than to question whether development should proceed in some locations at all. Policy E7 offers protection to the Chilterns AONB but there may be a need for a stronger policy to protect landscapes of high amenity and recreational value outside of the AONB.
3(c) Conserve and where appropriate, enhance the historic environment	0	0	0	No significant impact
3(d) Reduce pollution from any source	0	0	0	No significant impact
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	0	0	0	No significant impact
4(b) Improve the District's ability to adapt to climate change	0	0	0	No significant impact
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	0	0	0	No significant impact
5(b) Provide access to services and facilities for all	0	0	0	No significant impact
5(c) Promote community cohesion	0	0	0	No significant impact
5(d) Increase access to decent and affordable housing	0	0	0	The policy is framed to address the design and appearance of developments rather than to question whether development should proceed in some locations at all, which means it should not restrict housing

				development significantly.
5(e) Reduce crime rates and fear of crime	0	0	0	No significant impact
5(f) Improve conditions and services that engender good health and reduce health inequalities	0	0	0	No significant impact
5(g) Increase participation in education and life-long learning	0	0	0	No significant impact
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	0	0	0	No significant impact
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	0	0	0	No significant impact
6(b) Reduce waste	0	0	0	No significant impact
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	√	√	√	Will make a positive contribution to the quality of the public realm.
<p><b>Conclusions</b>  This policy primarily addresses the sustainability objective of protecting and enhancing landscapes. However, the policy is framed in such a way that it addresses the design and appearance of developments rather than to question whether development should proceed in some locations at all. Policy E7 offers protection to the Chilterns AONB but there may be a need for a stronger policy to protect landscapes of high amenity and recreational value outside of the AONB.</p> <p><b>Uncertainties</b>  No significant uncertainties identified.</p> <p><b>Recommendations/Mitigation</b>  In addition to the requirements set by the current wording in relation to design, appearance and landscaping, the policy should also include a presumption against development which would detrimentally affect landscapes of high amenity and recreational value. If already known, particularly sensitive locations could also be listed in the policy.</p> <p><b>NHDC Response</b>  Amend the policy in response to CAG's recommendations by including a sentence which states that development will not be permitted where it has a detrimental affect on the landscape. The policy will read:  "The landscape character of North Hertfordshire should be protected, enhanced or improved by development proposals as a result of their design, appearance and landscape schemes. <u>Development will not be permitted where there is a detrimental affect on the landscape.</u>  Developments will complement the character of the surrounding landscape, as identified in the Landscape Character Assessment Study."</p>				

## Natural Environment Policy NE2: Green Infrastructure

The Council will protect and enhance green infrastructure assets and new opportunities for creating green infrastructure will be sought.

Where appropriate new development will be expected to contribute towards the provision of additional green infrastructure and the protection and enhancement of existing green infrastructure.

Developers should use the guiding principles set out in the green infrastructure plan to influence all development proposals from an early stage in the design process.

Any new green infrastructure proposed must be accompanied by a plan for the long term sustainable maintenance and management of these assets, as well as phasing plans to demonstrate how they are to be delivered.

*This new policy was appraised by NHDC in August 2014. The appraisal is shown below.*

SA Objective: Will the policy...	Score			Justification for assessment and recommendations for Mitigation / recommendation / improvement
	S	M	L	
<i>Economic Activity</i>				
1. Achieve sustainable levels of prosperity and economic growth?	0	0	0	No significant impact.
<i>Land use and development patterns</i>				
2a. Minimise the development of greenfield land and other land with high environmental and amenity value?	1	1	1	The policy will afford protection of green spaces and land with high amenity value.
2b. Provide access to green spaces?	2	2	2	The policy will make a significant positive contribution towards the provision of accessible green spaces.
2c. Deliver more sustainable location patterns and reduce the use of motor vehicles?	0	0	0	No significant impact.
<i>Environmental protection</i>				
3a. Protect and enhance biodiversity?	2	2	2	The policy will make a significant positive contribution to protection and enhancement of biodiversity – as outlined in the Green Infrastructure Plan principles.
3b. Protect and enhance landscapes?	2	2	2	The policy will also make a significant positive contribution to protection and enhancement of landscapes as outlined in detail in the Green Infrastructure Plan.
3c. Conserve and, where appropriate, enhance the historic environment?	1	1	1	The policy will also make a significant positive contribution to protection and enhancement of the historic environment as outlined in the Green Infrastructure Plan principles.

3d. Reduce pollution from any source?	1	1	1	Vegetation and trees can assist in reducing atmospheric pollution, and the use of SUDS and protection of wetlands can help reduce water and ground water pollution.
<i>Climate change</i>				
4a. Reduce greenhouse gas emissions?	0	0	0	Vegetation and trees can assist in absorbing CO <sub>2</sub> , but unclear whether the scale would be significant.
4b. Improve the district's ability to adapt to climate change?	2	2	2	Green Infrastructure Plan principles include the use of SUDS to deliver and manage areas for flood storage and sustainable flood management.
<i>A just society</i>				
5a. Share benefits of prosperity fairly?	0	0	0	No significant impact.
5b. Provide access to services and facilities for all?	0	0	0	No significant impact.
5c. Promote community cohesion?	0	0	0	No significant impact.
5d. Increase access to decent and affordable housing?	0	0	0	It is likely there will be financial costs to developers arising from this policy. However, it is not clear whether they will result in increased costs for new housing.
5e. Reduce crime rates and fear of crime?	0	0	0	No significant impact.
5f. Improve conditions and services that engender good health and reduce health inequalities?	2	2	2	Provision of green infrastructure will increase opportunities for informal recreation. In addition Green Infrastructure plan principles include the provision of allotments.
5g. Increase participation in education and life-long learning?	0	0	0	No significant impact.
5h. Maintain and improve culture, leisure and recreational activities that are available to all?	1	1	1	Provision of green infrastructure will increase opportunities for informal recreation.
<i>Resource use and waste</i>				
6a. Use natural resources efficiently?	1	1	1	Green Infrastructure Plan principles include the use of SUDS.
6b. Reduce waste?	0	0	0	No significant impact.
<i>Town centres</i>				

7. Promote sustainable urban living?	0	0	0	No significant impact.
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Mitigation / recommendation	None identified
Uncertainties	None identified

### Natural Environment Policy NE3: Biodiversity

The Council will support new developments that make a positive contribution to the biodiversity of the district and opportunities to restore degraded or isolated habitats will be sought wherever possible.

Development proposals which cause unacceptable harm to Sites of Special Scientific Interest, Regionally Important Geological Sites, Local Nature Reserves or managed Local Wildlife Sites will normally be refused.

Development proposals which affect other sites or features of local biodiversity will not be permitted where there is an adverse impact on the ecological, geological or biodiversity interests of the site unless it can be demonstrated that adverse effects could be satisfactorily minimised through mitigation measures.

Development proposals should also demonstrate that if there are existing wildlife habitats such as trees, hedgerows and woodlands they will be retained, safeguarded and managed during and after development.

*Two earlier policies were combined to form this policy. The appraisals of these policies are shown below.*

### E8: Protecting biodiversity

Development proposals will not be permitted within, or on sites, which adversely affect, Sites of Special Scientific Interest, Regionally Important Geological Sites, Local Nature Reserves or managed Local Wildlife Sites.

Development proposals which affect other Local Wildlife Sites will not be permitted where there is an adverse impact on the ecological, geological or biodiversity interests of the site unless it can be demonstrated that:

- a. adverse effects could be prevented or satisfactorily be minimised through mitigation measures;
- b. there are exceptional circumstances for the development which outweigh the need to safeguard the biodiversity of the site and where this is adequately demonstrated then alternative wildlife habitat provision should be made in order to maintain local biodiversity.

SA Objectives	What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement
	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	0	0	0	The policy focuses protection on sites of designated biodiversity and geodiversity importance and is therefore unlikely to prove too restrictive in terms of economic development.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				

2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	√	√	√	The policy will afford protection to Greenfield and other land of high environmental and amenity value which is of designated importance in terms of biodiversity and geodiversity.
2(b) Provide access to green spaces	√	√	√	The policy will afford protection to green spaces of designated importance in terms of biodiversity and geodiversity.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	○	○	○	No significant impact
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	√	√	√	Offers protection to biodiversity on recognised and designated sites but does nothing to protect or enhance biodiversity and geodiversity elsewhere (the BAP, for example, identifies a significant amount of urban biodiversity) and does not promote measures to enhance biodiversity in all new developments. PPS9 requires all LPA's to ensure that 'appropriate weight is attached to designated sites... <i>and to biodiversity and geological interests within the wider environment</i> '. It goes on state that 'Plan policies should promote opportunities for the incorporation or beneficial biodiversity and geological features within the design of development'.
3(b) Protect and enhance landscapes	√	√	√	The policy will afford protection to landscapes which include areas of designated importance in terms of biodiversity and geodiversity.
3(c) Conserve and where appropriate, enhance the historic environment	○	○	○	No significant impact
3(d) Reduce pollution from any source	○	○	○	No significant impact
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	○	○	○	No significant impact
4(b) Improve the District's ability to adapt to climate change	○	○	○	No significant impact
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	○	○	○	No significant impact
5(b) Provide access to services and facilities for all	○	○	○	No significant impact
5(c) Promote community cohesion	○	○	○	No significant impact
5(d) Increase access to decent and affordable housing	○	○	○	The policy focuses protection on sites of designated biodiversity and geodiversity importance and is therefore unlikely to prove too restrictive in terms of housing development.
5(e) Reduce crime rates and fear of crime	○	○	○	No significant impact
5(f) Improve conditions and services that engender good health and reduce health inequalities	○	○	○	No significant impact
5(g) Increase participation	○	○	○	No significant impact

in education and life-long learning				
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	0	0	0	No significant impact
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	0	0	0	No significant impact
6(b) Reduce waste	0	0	0	No significant impact
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	0	0	0	No significant impact
<p><b>Conclusions</b></p> <p>The growing pressure on locally significant species and habitats has been identified as a key sustainability for the District, which highlights the importance of this policy. The proposed policy wording only provides protection for designated sites. Although this includes unmanaged Local Wildlife Sites, the policy does not provide protection for biodiversity and geodiversity on non-designated sites, nor does it promote the protection of biodiversity and geological interests more widely. This is contrary to PPS9 which states:</p> <ul style="list-style-type: none"> <li>• <i>'LPA's should ensure that appropriate weight is attached to designated sites... and to biodiversity and geological interests within the wider environment'; and</i></li> <li>• <i>'Plan policies should promote opportunities for the incorporation or beneficial biodiversity and geological features within the design of development'.</i></li> </ul> <p><b>Uncertainties</b></p> <p>Strengthening the policy on biodiversity and geodiversity may have a negative effect on the ability of the District to secure sufficient development to meet housing need and achieve sustainable levels of economic growth, but this has not been quantified.</p> <p><b>Recommendations/Mitigation</b></p> <p>Whilst continuing to focus protection on designated sites, the policy wording should be revised so as to recognise the importance of all existing biodiversity and geodiversity and of sustaining and, where possible, improving the quality and extent of existing natural habitats and geological and geomorphological sites in all new development.</p> <p>In addition, the policy should promote opportunities for the incorporation or beneficial biodiversity and geological features within the design of all new development.</p> <p><b>NHDC Response</b></p> <p>In response to CAG's recommendations the policy should be amended to :</p> <p>Delete "Local Wildlife Sites" from the second paragraph and replace with "sites of biodiversity interest" to ensure that all sites with biodiversity interest are included in the policy, not just those which have been designated in some way.</p> <p>Include a sentence at the end of the policy encouraging developers to make a positive contribution to the biodiversity of the district.</p> <p>The policy will therefore read:</p> <p>"Development proposals will not be permitted which adversely affect Sites Sites of Special Scientific Interest, Regionally Important Geological Sites, Local Nature Reserves or managed Local Wildlife Sites.</p> <p>Development proposals which affect other sites of biodiversity interest will not be permitted where there is an adverse impact on the ecological, geological or biodiversity interests of the site unless it can be demonstrated that:</p> <ol style="list-style-type: none"> <li>adverse affects could be prevented or satisfactorily be minimised through mitigation measures;</li> <li>there are exceptional circumstances for the development which outweigh the need to safeguard the biodiversity of the site and where this is adequately demonstrated then alternative wildlife habitat provision should be made in order to maintain local biodiversity.</li> </ol> <p>The Council will encourage all new developments to make a positive contribution to the biodiversity of the district."</p>				
<p><b>E9: Woodlands and trees</b></p> <p>Development proposals should demonstrate that existing trees, hedgerows and woodlands will be retained, safeguarded and managed during and after development.</p> <p>Where the loss of trees, woodlands or hedgerows is unavoidable, the proposal should demonstrate that they are replaced or the adverse effects satisfactorily mitigated.</p>				



SA Objectives	What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement
	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	0	0	0	No significant impact
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	√	√	√	Through protecting trees, hedgerows and woodlands, the policy will help to protect Greenfield and other land which contains such features.
2(b) Provide access to green spaces	√	√	√	Through protecting trees, hedgerows and woodlands, the policy will help to protect green spaces which contain such features.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	0	0	0	No significant impact
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	√	√	√	The policy will protect trees, hedgerows and woodlands, and the habitats they support, although it does recognise that, in some cases, loss of such features will be unavoidable.
3(b) Protect and enhance landscapes	√	√	√	Through protecting trees, hedgerows and woodlands, the policy will help to protect landscapes which contain such features.
3(c) Conserve and where appropriate, enhance the historic environment	0	0	0	No significant impact
3(d) Reduce pollution from any source	√	√	√	Trees absorb carbon dioxide and can help to reduce atmospheric pollution.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	√	√	√	Trees absorb carbon dioxide.
4(b) Improve the District's ability to adapt to climate change	0	0	0	No significant impact
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	0	0	0	No significant impact
5(b) Provide access to services and facilities for all	0	0	0	No significant impact
5(c) Promote community cohesion	0	0	0	No significant impact
5(d) Increase access to decent and affordable housing	0	0	0	No significant impact
5(e) Reduce crime rates and fear of crime	0	0	0	No significant impact
5(f) Improve conditions and services that engender good health and reduce health inequalities	0	0	0	No significant impact
5(g) Increase participation in education and life-long learning	0	0	0	No significant impact
5(h) Maintain and improve	0	0	0	No significant impact

culture, leisure and recreational activities that are available to all				
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	0	0	0	No significant impact
6(b) Reduce waste	0	0	0	No significant impact
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	0	0	0	No significant impact
<p><b>Conclusions</b>  The protection of trees, hedgerows and woodlands is an important aspect of protecting biodiversity but the policy will also have positive effects in terms of other sustainability objectives, including protecting green spaces and important landscapes. The policy recognises that in some cases, the loss of trees, hedgerows and woodlands may be unavoidable but requires appropriate replacement or mitigation in such cases.</p> <p><b>Uncertainties</b>  No significant uncertainties identified</p> <p><b>Recommendations/Mitigation</b>  None identified</p> <p><b>NHDC Response</b>  None required</p>				

<p><b>Natural Environment Policy NE4 : Renewable energy development</b></p> <p>Proposals for renewable energy development which would contribute towards the achievement of targets set out in the UK Renewable Energy Strategy will be supported subject to an assessment of the impacts upon:</p> <ol style="list-style-type: none"> <li>1. the landscape character and visual amenity;</li> <li>2. environmental and historic assets;</li> <li>3. the transport network;</li> <li>4. air quality;</li> <li>5. aviation interests;</li> <li>6. local businesses; and</li> <li>7. the amenity of residents and sensitive uses.</li> </ol> <p>In assessing renewable energy proposals against the above criteria the council will give significant weight to their local and wider benefits, particularly the potential to reduce greenhouse gas and other harmful emissions, and the social benefits of community owned schemes where this is relevant.</p> <p>In all cases, end of life/redundant plant, buildings, apparatus, and infrastructure must be removed and the site restored to its former state or a condition agreed with the council.</p> <p><i>Two earlier policies were combined to form this policy. The appraisals of these policies are shown below.</i></p> <p><b>D5: General renewable energy development</b></p> <p>In considering applications for renewable energy development, the Council will weigh the benefits of producing energy from non-polluting sources, against any adverse impacts produced by the development.</p> <p>In considering such proposals, the Council will assess the impacts on:</p> <ol style="list-style-type: none"> <li>a) residential /workplace amenity or human health;</li> <li>b) the visual amenity of the local area, including landscape character;</li> <li>c) local natural resources, including air and water quality;</li> <li>d) biodiversity, nature conservation or historical/archaeological interests;</li> <li>e) public access to the countryside; and</li> </ol>
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<p>f) the openness and visual amenity of the Green Belt.          Developments will be expected to be located at, or as close as possible to, the source of the resource needed for that particular technology, unless, in the case of Combined Heat and Power schemes, it can be demonstrated that the benefits of the scheme outweigh the costs of transportation.          In all cases, end of life/redundant plant, buildings, apparatus, and infrastructure shall be removed and the site restored to its former state or a condition agreed with the Planning Authority.          The Council will require applications for such developments to be accompanied by an appropriate detailed statement of the environmental effects of the development, and its benefits in terms of the amount of energy it is expected to generate.          Permission will only be granted if any unavoidable damage that would be caused during installation, operation or decommissioning is minimised and mitigated or compensated for.          Applications must indicate both how this will be achieved together with any wider environmental and economic benefits that the scheme may bring.</p>				
	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	√	√	√	There are potential economic benefits in terms of increasing opportunities such as in environmental technology sectors and biomass production.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	X	X	X	Some large scale renewable energy technologies, such as wind farms, would almost certainly be located on Greenfield land, whilst others, such as domestic installations, would be located in built-up areas. The potential impacts on the green belt are addressed in clause (f) of the policy.
2(b) Provide access to green spaces	O	O	O	The impact on public access to open spaces is unlikely to be significant, particularly since this is included in the policy criteria.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	O	O	O	No significant impact.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	X/O	X/O	X/O	Potential negative biodiversity impacts would be taken into consideration due to clause (d) and the inclusion of a requirement for a detailed statement of environmental effects.
3(b) Protect and enhance landscapes	X	X	X	Some renewable energy installations will have adverse landscape impacts but this would be taken into consideration due to clause (b)
3(c) Conserve and where appropriate, enhance the historic environment	X	X	X	Some renewable energy installations will have adverse impacts on the historic environment but this would be taken into consideration due to clauses (b) and (d)
3(d) Reduce pollution from any source	√	√	√	The promotion of renewable energy would lead to the reduction of greenhouse gas and other pollutants associated with traditional energy generation.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	√√	√√	√√	The Hertfordshire Renewable Energy Study estimates that a county-wide reduction of up to 556,400 tonnes CO2 per year could be achieved through large scale renewable energy production and up to 24,650

				tonnes CO2 per year from embedded renewable energy production in new dwellings.
4(b) Improve the District's ability to adapt to climate change	0	0	0	No significant impact.
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	0	0	0	No significant impact.
5(b) Provide access to services and facilities for all	0	0	0	No significant impact.
5(c) Promote community cohesion	0	0	0	No significant impact. There are potential benefits in terms of community-owned renewable energy schemes, which could be recognised in the policy.
5(d) Increase access to decent and affordable housing	0	0	0	No significant impact.
5(e) Reduce crime rates and fear of crime	0	0	0	No significant impact.
5(f) Improve conditions and services that engender good health and reduce health inequalities	0	0	0	No significant impact.
5(g) Increase participation in education and life-long learning	0	0	0	No significant impact.
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	0	0	0	No significant impact.
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	√	√	√	The promotion of renewable energy could contribute to reducing the demand for the raw materials used in traditional energy generation.
6(b) Reduce waste	0	0	0	There is the potential for a minor positive benefit from the use of sewage sludge for energy generation.
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	0	0	0	No significant impact.
<p><b>Conclusions</b></p> <p>The promotion of renewable energy has the potential to address some of the key sustainability issues for North Hertfordshire, including reducing greenhouse gas emissions and promoting rural economic diversification. The Hertfordshire Renewable Energy Study estimates that a county-wide reduction of up to 556,400 tonnes CO2 per year could be achieved through large scale renewable energy production and up to 24,650 tonnes CO2 per year from embedded renewable energy production in new dwellings. However, there are a number of potential negative effects, which are effectively addressed in the policy criteria.</p> <p>The policy would be significantly strengthened in sustainability terms, and would be more likely to assist in contributing to the County targets if it were phrased such that there is a general presumption in favour of renewable energy developments, providing they meet the criteria listed.</p> <p><b>Uncertainties</b></p> <p>There are uncertainties surrounding the potential impact of renewable energy schemes on the landscape and on the natural and historic environment, due to uncertainty about the levels of renewable energy which will be achieved and the split between different renewable energy technologies. These issues could be explored at the District level based on the findings of the Hertfordshire Renewable Energy Study.</p> <p><b>Recommendations/Mitigation</b></p> <p>The policy should promote renewable energy production through stating a general presumption in favour of renewable energy developments, providing they meet the criteria listed.</p>				

Consideration should also be given to recognising the potential social benefits of community-owned renewable energy schemes.				
<b>NHDC Response</b>				
Amend policy to state that there will be presumption in favour of renewable energy development. Amend policy to say that Council will weigh the social benefits of community owned renewable energy schemes where this is the case.				
<b>D7: Wind energy development</b>				
Proposals for wind energy developments must comply with all aspects of policy D5 (general renewable energy development)				
In addition, the Council will also assess the impact of proposals on:				
<ul style="list-style-type: none"> <li>highway or aviation safety;</li> <li>existing transmitting or receiving systems;</li> <li>potential nuisance arising from noise, shadow flicker, electromagnetic interference or reflected light.</li> </ul>				
	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	<b>O</b>	<b>O</b>	<b>O</b>	There may be some minor economic benefits from jobs in the manufacture and/or installation of schemes.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	<b>X X</b>	<b>X X</b>	<b>X X</b>	Some wind farms would almost certainly be located on Greenfield land, whilst others, such as domestic installations, would be located in built-up areas. The potential impacts on the green belt are addressed in clause (f) of policy D5.
2(b) Provide access to green spaces	<b>O</b>	<b>O</b>	<b>O</b>	The impact on public access to open spaces is unlikely to be significant, particularly since this is included in the policy criteria in D5.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	<b>O</b>	<b>O</b>	<b>O</b>	No significant impact.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	<b>X/O</b>	<b>X/O</b>	<b>X/O</b>	Potential negative biodiversity impacts would be taken into consideration due to clause (d) in D5 and the inclusion of a requirement for a detailed statement of environmental effects.
3(b) Protect and enhance landscapes	<b>X X</b>	<b>X X</b>	<b>X X</b>	Some wind energy installations will have adverse landscape impacts but this would be taken into consideration due to clause (b) of D5
3(c) Conserve and where appropriate, enhance the historic environment	<b>X</b>	<b>X</b>	<b>X</b>	If inappropriately sited, some wind energy installations may have adverse impacts on the historic environment but this would be taken into consideration due to clauses (b) and (d) of D5
3(d) Reduce pollution from any source	<b>√</b>	<b>√</b>	<b>√</b>	The promotion of wind energy would lead to the reduction of greenhouse gas and other pollutants associated with traditional energy generation.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	<b>√ √</b>	<b>√ √</b>	<b>√ √</b>	The Hertfordshire Renewable Energy Study suggests that large wind turbines could contribute to a county-wide reduction of up to 71,000 tonnes CO2 per year. It also

				suggests that if renewable energy targets are to be met, much of the energy will have to be produced by wind power. Another finding was that the areas of the County which were technically feasible for wind energy development were in North Hertfordshire and East Hertfordshire. A policy which promotes wind energy is therefore essential.
4(b) Improve the District's ability to adapt to climate change	0	0	0	No significant impact.
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	0	0	0	No significant impact.
5(b) Provide access to services and facilities for all	0	0	0	No significant impact.
5(c) Promote community cohesion	0	0	0	No significant impact. There are potential benefits in terms of community-owned renewable energy schemes, which could be recognised in policy D5.
5(d) Increase access to decent and affordable housing	0	0	0	No significant impact.
5(e) Reduce crime rates and fear of crime	0	0	0	No significant impact.
5(f) Improve conditions and services that engender good health and reduce health inequalities	0	0	0	No significant impact.
5(g) Increase participation in education and life-long learning	0	0	0	No significant impact.
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	0	0	0	No significant impact.
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	√	√	√	The promotion of wind energy could contribute to reducing the demand for the raw materials used in traditional energy generation.
6(b) Reduce waste	0	0	0	No significant impact.
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	0	0	0	No significant impact.
<p><b>Conclusions</b>  The promotion of wind energy will address the key sustainability issue of greenhouse gas emissions. However, given the significance of the role of wind energy in North Hertfordshire in meeting County-level targets, the policy should more strongly promote wind energy developments.  There are potential negative effects on landscape and the historic environment, although this is addressed in policy D5.</p> <p><b>Uncertainties</b>  No significant uncertainties identified.</p> <p><b>Recommendations/Mitigation</b>  The policy wording should be changed so as to more strongly encourage wind energy developments where they meet the criteria set out in this policy and policy D5.</p> <p><b>NHDC Response</b>  Wind proposals will be considered against this policy and policy D5. Policy D5 has been amended to state that there will be presumption in favour of renewable energy, and so it is not necessary</p>				

to state this again in policy D7.

<b>Natural Environment Policy NE5: Delivering sustainable water supply</b>				
All proposals will be expected to achieve a high standard of water use efficiency. To assist in the reduction of water consumption, development proposals including new build and conversion must demonstrate estimated residential water consumption should not exceed 105 litres per person per day until national statutory guidance supersedes this policy. Non-residential development should aim to achieve BREEAM 'excellent' rating.				
<i>This new policy was appraised in September 2014. The appraisal is shown below.</i>				
<b>SA Objective: Will the policy...</b>	<b>Score</b>			<b>Justification for assessment and recommendations for Mitigation / recommendation / improvement</b>
<i>Economic Activity</i>	S	M	L	
1. Achieve sustainable levels of prosperity and economic growth?	X	X	X	Some developments with economic benefits may be refused as a result of this policy. It may also have a negative effect on the provision of affordable housing in new development
<i>Land use and development patterns</i>				
2a. Minimise the development of greenfield land and other land with high environmental and amenity value?	0	0	0	No significant impact.
2b. Provide access to green spaces?	0	0	0	No significant impact.
2c. Deliver more sustainable location patterns and reduce the use of motor vehicles?	0	0	0	No significant impact.
<i>Environmental protection</i>				
3a. Protect and enhance biodiversity?	0	0	√?	By reducing the need for water abstraction, and encouraging rainwater harvesting and greywater recycling, this policy is likely to protect water quality of rivers and groundwater. This may have an indirect positive effect on biodiversity, especially in the longterm.
3b. Protect and enhance landscapes?	0	0	0	No significant impact.
3c. Conserve and, where appropriate, enhance the historic environment?	0	0	0	No significant impact.
3d. Reduce pollution from any source?	0	√	√	By reducing the need for water abstraction, and encouraging rainwater harvesting and greywater recycling, this policy is likely to protect water quality of rivers and groundwater.

<i>Climate change</i>				
4a. Reduce greenhouse gas emissions?	0	√	√	Greenhouse gases are generated during the secondary treatment of waste water and sewage sludge. By encouraging rainwater harvesting and greywater recycling, this policy is likely to reduce emissions from this source.
4b. Improve the district's ability to adapt to climate change?	0	√	√	This policy would reduce the pressure on water resources, and make the new housing more resilient, and able to cope with impacts of drought.
<i>A just society</i>				
5a. Share benefits of prosperity fairly?	√	√	√	This policy is likely to reduce water bills, which would benefit those on low incomes.
5b. Provide access to services and facilities for all?	0	0	0	No significant impact.
5c. Promote community cohesion?	0	0	0	No significant impact.
5d. Increase access to decent and affordable housing?	?	?	?	This policy may have a negative effect on the provision of affordable housing in new development
5e. Reduce crime rates and fear of crime?	0	0	0	No significant impact.
5f. Improve conditions and services that engender good health and reduce health inequalities?	0	0	0	No significant impact.
5g. Increase participation in education and life-long learning?	0	0	0	No significant impact.
5h. Maintain and improve culture, leisure and recreational activities that are available to all?	0	0	0	No significant impact.
<i>Resource use and waste</i>				
6a. Use natural resources efficiently?	√√	√√	√√	The policy contributes to the protection of groundwater resources and promotes the efficient use of water. However, the figure of 105 litres per person per day for domestic use equates to levels 3 and 4 in the Code for Sustainable Homes, whereas 80 litres per person per day (code level 5 or 6) should be achievable, if greywater recycling and rainwater harvesting is incorporated in development.
6b. Reduce waste?	√	√	√	The policy will help to promote greywater use and rainwater recycling.



<i>Town centres</i>				
7. Promote sustainable urban living?	0	0	0	No significant impact.
<p><b>Conclusion</b></p> <p>This policy requires significant levels of water efficiency in new developments. This will have significant positive effects on protecting water resources, and the quality of rivers and groundwater. It may have a negative effect on provision of affordable housing.</p> <p><b>Uncertainties</b></p> <p>The potential impact of this policy on housing and other forms of development has not been quantified.</p> <p><b>Recommendations/Mitigation</b></p> <p>It is recognised that the policy requires a high level of water efficiency. However, the Council is encouraged to consider whether there is potential for more stringent level of water efficiency in particular developments where this might be economically viable or necessary to respond to watersupply infrastructure constraints (for example for developments on the edge of Stevenage).</p> <p><b>NHDC Response</b></p> <p>The policy is evidenced by the Water Cycle Study and has support of the Environment Agency. At this stage there isn't the evidence to support more stringent water efficiency measures, however if future reviews of the Water Cycle study or other evidence arises to suggest a lower figure it will be something to consider.</p>				

<p><b>Natural Environment Policy NE6: Reducing flood risk</b></p> <p>The Council will take a risk based approach to development and flood risk, directing development to areas at lowest risk in accordance with the NPPF. The sequential and exception test, as set out in the NPPF, will be applied for developments in North Hertfordshire.</p> <p>The Strategic Flood Risk Assessment defines flood zones in the district and this will be used to inform the application of these tests as well as Environment Agency flood maps. Proposals within flood zone 1, over 1 hectare and all types of development within flood zone 2 &amp; 3 will need to submit a Flood Risk Assessment in accordance with the criteria in the NPPF.</p> <p>Where development is located within the flood plain (after satisfying the Sequential Test and Exception Test) a reduction in flood risk must be managed through flood resistant design and construction. Development must be located, designed and laid out to ensure the risk of flooding is minimised whilst not increasing flood risk elsewhere.</p> <p>Where planning permission is granted, developers will be required to show that any flood protection and mitigation measures which may be necessary do not have an unacceptable impact on nature conservation, landscape and recreation. The most sustainable drainage solutions will be sought for each development to reduce the risk of surface water flooding, enhance biodiversity, water quality and provide amenity benefits. Sites should aim to mimic the drainage of an undeveloped greenfield site. Drainage solutions must follow the SuDS hierarchy.</p> <p>Overland flow routes and flood storage areas will be protected from all development other than that which is "water compatible".</p> <p>Developers should consult with the SAB at the earliest possible opportunity, to ensure SuDS are incorporated at the design stage.</p> <p><i>This new policy was appraised by NHDC in August 2014. The appraisal is shown below.</i></p>				
<b>SA Objective: Will the policy...</b>	<b>Score</b>			<b>Justification for assessment and recommendations for Mitigation / recommendation / improvement</b>
<i>Economic Activity</i>	S	M	L	
1. Achieve sustainable levels of prosperity and economic growth?	-1	-1	-1	Some developments with economic benefits may be refused as a result of this policy. However, the policy allows for instances where there are

				overriding reasons for development and these are considered to outweigh the risks.
<i>Land use and development patterns</i>				
2a. Minimise the development of greenfield land and other land with high environmental and amenity value?	1	1	1	Much floodplain land is likely to be greenfield land.
2b. Provide access to green spaces?	0	0	0	No significant impact.
2c. Deliver more sustainable location patterns and reduce the use of motor vehicles?	0	0	0	No significant impact.
<i>Environmental protection</i>				
3a. Protect and enhance biodiversity?	1	1	1	The policy may indirectly benefit biodiversity through offering increased protection of floodplain areas. Reducing surface water run off through sustainable drainage systems can help to reduce the amount of pollution entering the water courses and therefore indirectly helping to protect biodiversity.
3b. Protect and enhance landscapes?	1	1	1	The policy may indirectly benefit landscapes through offering increased protection for floodplain areas.
3c. Conserve and, where appropriate, enhance the historic environment?	0	0	0	No significant impact.
3d. Reduce pollution from any source?	0	0	0	No significant impact.
<i>Climate change</i>				
4a. Reduce greenhouse gas emissions?	0	0	0	No significant impact.
4b. Improve the district's ability to adapt to climate change?	2	2	2	Restricting development in flood risk areas is a key aspect of climate change adaptation.
<i>A just society</i>				
5a. Share benefits of prosperity fairly?	0	0	0	No significant impact.
5b. Provide access to services and facilities for all?	0	0	0	No significant impact.
5c. Promote community cohesion?	0	0	0	No significant impact.
5d. Increase access to decent	0	0	0	No significant impact.

and affordable housing?				
5e. Reduce crime rates and fear of crime?	0	0	0	No significant impact.
5f. Improve conditions and services that engender good health and reduce health inequalities?	0	0	0	No significant impact.
5g. Increase participation in education and life-long learning?	0	0	0	No significant impact.
5h. Maintain and improve culture, leisure and recreational activities that are available to all?	0	0	0	No significant impact.
<i>Resource use and waste</i>				
6a. Use natural resources efficiently?	1	1	1	The policy contributes to the protection of groundwater resources and promotes the efficient use of water.
6b. Reduce waste?	1	1	1	The policy will help to promote local recycling of water.
<i>Town centres</i>				
7. Promote sustainable urban living?	0	0	0	No significant impact.

Mitigation / recommendation	None identified
Uncertainties	The potential impact of this policy on housing and other forms of development has not been quantified.

<p><b>Natural Environment Policy NE7: Protecting and enhancing the water quality and the water environment</b></p> <p>All new development proposals will seek to make space for water and will maintain a minimum 8 metre<sup>8</sup> wide undeveloped buffer zone from all designated main rivers and 5m for ordinary watercourses to enhance and protect local biodiversity and wildlife corridors and ensure the preservation of acceptable flood flow routes is maintained.</p> <p>Where proposals are considered to affect nearby watercourses or sites that are situated close to a river, the Council will seek river restoration as part of the proposal. In some instances financial contributions may be appropriate towards the restoration of rivers.</p> <p><i>This new policy was appraised in September 2014</i></p>				
<b>SA Objective: Will the policy...</b>	<b>Score</b>			<b>Justification for assessment and recommendations for Mitigation / recommendation / improvement</b>
<i>Economic Activity</i>	S	M	L	
1. Achieve sustainable levels of prosperity and economic	?	?	?	Some developments with economic benefits may be refused as a result of

<sup>8</sup> Water Resources Act 1991

growth?				this policy.
<i>Land use and development patterns</i>				
2a. Minimise the development of greenfield land and other land with high environmental and amenity value?	0	0	0	No significant impact.
2b. Provide access to green spaces?	0	0	0	No significant impact.
2c. Deliver more sustainable location patterns and reduce the use of motor vehicles?	0	0	0	No significant impact.
<i>Environmental protection</i>				
3a. Protect and enhance biodiversity?	√	√	√	The buffer zone and protection of rivers is likely to have a significant positive effect.
3b. Protect and enhance landscapes?	?	?	?	The policy may protect the quality of landscapes adjacent to rivers.
3c. Conserve and, where appropriate, enhance the historic environment?	0	0	0	No significant impact.
3d. Reduce pollution from any source?	√	√	√	The policy is likely to protect water quality of rivers.
<i>Climate change</i>				
4a. Reduce greenhouse gas emissions?	0	0	0	No significant impact.
4b. Improve the district's ability to adapt to climate change?	√	√	√	The policy is likely to contribute to reducing impacts of flooding.
<i>A just society</i>				
5a. Share benefits of prosperity fairly?	0	0	0	No significant impact.
5b. Provide access to services and facilities for all?	0	0	0	No significant impact.
5c. Promote community cohesion?	0	0	0	No significant impact.
5d. Increase access to decent and affordable housing?	0	0	0	No significant impact.
5e. Reduce crime rates and fear of crime?	0	0	0	No significant impact.
5f. Improve conditions and services that engender good health and reduce health inequalities?	0	0	0	No significant impact.

5g. Increase participation in education and life-long learning?	0	0	0	No significant impact.
5h. Maintain and improve culture, leisure and recreational activities that are available to all?	0	0	0	No significant impact.
<i>Resource use and waste</i>				
6a. Use natural resources efficiently?	?	?	?	The policy may contribute indirectly to the protection of groundwater resources.
6b. Reduce waste?	0	0	0	No significant impact.
<i>Town centres</i>				
7. Promote sustainable urban living?	0	0	0	No significant impact.

Mitigation / recommendation	None identified
Uncertainties	The potential impact of this policy on housing and other forms of development has not been quantified.

<p><b>Natural Environment Policy NE8: Water Framework Directive and wastewater infrastructure</b></p> <p>New development in North Hertfordshire should not create deterioration of any watercourse in accordance with the Water Framework Directive.</p> <p>New development around Stevenage within the Rye Meads Sewage Treatment Works Catchment will need to demonstrate that additional potable water supply and wastewater treatment capacity can be achieved and implemented ahead of development without significant environmental impact, including adverse effects on designated sites.</p> <p>On large sites Drainage Strategies will be required in advance of development to ensure that adequate infrastructure is in place before development commences.</p> <p>Where appropriate, development should help achieve the flood management goals from the Anglian and Thames River Basin Management Plans.</p>				
<b>SA Objective: Will the policy...</b>	<b>Score</b>			<b>Justification for assessment and recommendations for Mitigation / recommendation / improvement</b>
<i>Economic Activity</i>	S	M	L	
1. Achieve sustainable levels of prosperity and economic growth?	?	?	?	Some developments with economic benefits may be refused as a result of this policy. It may also increase the cost of development and have a negative effect on the provision of affordable housing in new

				development
<i>Land use and development patterns</i>				
2a. Minimise the development of greenfield land and other land with high environmental and amenity value?	0	0	0	No significant impact.
2b. Provide access to green spaces?	0	0	0	No significant impact.
2c. Deliver more sustainable location patterns and reduce the use of motor vehicles?	0	0	0	No significant impact.
<i>Environmental protection</i>				
3a. Protect and enhance biodiversity?	√	√	√	The policy protects biodiversity and designated sites by ensuring that wastewater and sewerage infrastructure is able to service new development and does not cause pollution. Drainage Strategies are also likely to include sustainable drainage systems , which can also help to reduce the amount of pollution entering the water courses and therefore indirectly helping to protect biodiversity.
3b. Protect and enhance landscapes?	?	?	?	The policy may indirectly benefit landscapes through encouraging the consideration of SuDS.
3c. Conserve and, where appropriate, enhance the historic environment?	0	0	0	No significant impact.
3d. Reduce pollution from any source?	√	√	√	The policy ensures that wastewater and sewerage infrastructure is able to service new development and does not cause pollution. Drainage Strategies are also likely to include sustainable drainage systems , which can also help to reduce the amount of pollution entering the water courses .
<i>Climate change</i>				
4a. Reduce greenhouse gas emissions?	0	0	0	No significant impact.
4b. Improve the district's ability to adapt to climate change?	√	√	√	Policy supports flood management goals, and is likely to ensure water resources are adequate for new development.
<i>A just society</i>				
5a. Share benefits of prosperity	0	0	0	No significant impact.

fairly?				
5b. Provide access to services and facilities for all?	0	0	0	No significant impact.
5c. Promote community cohesion?	0	0	0	No significant impact.
5d. Increase access to decent and affordable housing?	?	?	?	This policy may increase the cost of development and have a negative effect on the provision of affordable housing in new development
5e. Reduce crime rates and fear of crime?	0	0	0	No significant impact.
5f. Improve conditions and services that engender good health and reduce health inequalities?	0	0	0	No significant impact.
5g. Increase participation in education and life-long learning?	0	0	0	No significant impact.
5h. Maintain and improve culture, leisure and recreational activities that are available to all?	0	0	0	No significant impact.
<i>Resource use and waste</i>				
6a. Use natural resources efficiently?	√	√	√	The policy supports the effective management of water resources.
6b. Reduce waste?	0	0	0	No significant impact.
<i>Town centres</i>				
7. Promote sustainable urban living?	0	0	0	No significant impact.

Mitigation / recommendation	None identified
Uncertainties	The potential impact of this policy on housing and other forms of development has not been quantified.

### **Natural Environment Policy NE9: Contaminated land**

Development proposals must give consideration to the potential or actual impact of land contamination, whether naturally occurring or man-made, on surrounding receptors.

Where required, proposals should be in place to investigate and where appropriate remediate the risks, otherwise the development proposal may be refused.

All land which is considered to be contaminated will require a Contaminated Land Study or a Contaminated Land Risk Assessment to be submitted as part of the planning application. The assessment will need to demonstrate how the site will be safely managed before, during and after development and highlight any remedial action where required. Development must ensure that water quality is not compromised and improvements to water quality will be secured where appropriate, in accordance with the Water Framework Directive.

Receptors may include human beings, the built environment and the natural environment,

including controlled waters <sup>9</sup> .				
<i>An earlier version of this policy was appraised. The appraisal is shown below.</i>				
<b>D12: Contaminated land</b>				
Development proposals must demonstrate that, if receptors are at risk because of the potential for, or reality of, land contamination, whether naturally occurring or man-made, there has been realistic consideration of this, or that proposals are in place to investigate or remediate the risks, otherwise the development may be refused.				
Receptors may include; human beings, the built environment and property and the natural environment, including controlled waters as defined in Annex 3 of the DEFRA Circular on Contaminated Land 1/2006.				
Where the cost of remediating a contaminated site is prohibiting its beneficial redevelopment, and the contamination from that site poses a significant risk to human health or biodiversity, we will consider allowing higher value developments as an exception to normal policy in order to fund the necessary remedial works. Such development will be restricted to the minimum necessary to fund the remediation and should be compatible in amenity terms with the neighbouring land uses.				
	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	○	√	√	The policy may help to achieve the redevelopment of sites previously under industrial use for new employment-generating uses.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	√ √	√ √	√ √	The policy should encourage the re-use of brownfield land, thereby reducing pressure on Greenfield sites.
2(b) Provide access to green spaces	○	○	○	No significant impact
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	√ √	√ √	√ √	The policy should encourage the re-use of brownfield land in urban areas, which will tend to be better served by public transport.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	√ √	√ √	√ √	The policy aims to prevent contamination of the natural environment.
3(b) Protect and enhance landscapes	○	○	○	No significant impact
3(c) Conserve and where appropriate, enhance the historic environment	?	?	?	The exception clause in the policy may lead to development which negatively affects the historic environment.
3(d) Reduce pollution from any source	√ √	√ √	√ √	The policy aims to prevent contamination of the natural environment.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	○	○	○	No significant impact
4(b) Improve the District's ability to adapt to climate change	○	○	○	No significant impact
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	○	○	○	No significant impact
5(b) Provide access to services and facilities for all	○	○	○	No significant impact

<sup>9</sup> Currently defined in Section 4 of the Defra Contaminated Land Statutory Guidance, April 2012.



5(c) Promote community cohesion	0	0	0	No significant impact
5(d) Increase access to decent and affordable housing	√	√√	√√	The policy should lead to increased opportunities for delivery of new housing on contaminated brownfield sites
5(e) Reduce crime rates and fear of crime	0	0	0	No significant impact
5(f) Improve conditions and services that engender good health and reduce health inequalities	√	√	√	The policy addresses the human health risks of land contamination
5(g) Increase participation in education and life-long learning	0	0	0	No significant impact
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	0	0	0	No significant impact
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	√√	√√	√√	The policy promotes the efficient use of land through promoting the re-use of previously developed land.
6(b) Reduce waste	0	0	0	No significant impact
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	√√	√√	√√	The policy should encourage the re-use of brownfield land in urban areas.
<p><b>Conclusions</b>  This policy makes an important contribution to a number of the sustainability objectives and addresses a number of the key sustainability issues identified, including promoting the re-use of land in urban areas, protecting groundwater supplies and increasing the supply of housing.</p> <p><b>Uncertainties</b>  The exception clause in the policy may lead to negative effects on the historic environment but these have not been quantified.</p> <p><b>Recommendations/Mitigation</b>  None identified.</p> <p><b>NHDC Response</b>  Noted</p>				

## Historic environment

### Historic Environment Policy HE1: Heritage Strategy

During the course of the plan period the Council will, on an iterative basis, deliver its heritage strategy which will include, but is not limited to:

1. Conservation Area Reviews;
2. updated records of Buildings of Local Interest, Local Parks and Garden of Interest, Scheduled Monuments and Sites of Archaeological Interest;
3. guidance on shopfront design in conservation areas; and
4. guidance on advertisements in conservation areas.

Where there is a proposal to demolish:

- i) A Building of Local Interest that is both located within a Conservation Area and entered on a Register of Buildings of Local Interest adopted by the Council; or
- ii) A 'positive' building that has been identified on a Conservation Area map adopted by the Council; or
- iii) A building/structure that is considered to be worthy of Building of Local Interest or 'positive' building status but is not currently adopted as such by the Council and is also located within a Conservation Area,

Then, subject to a justification for the demolition of a building/structure under i), ii) or iii) above being provided and considered acceptable to the Council, planning permission shall only be granted for demolition subject to the requirement of a continuous contract for demolition and redevelopment of the site unless there are justifiable grounds for not redeveloping the site.

*The appraisal of an earlier version of this policy is shown below.*

SA Objectives	What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement
	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	?	?	?	Protecting the historic environment may make a contribution to sustainable tourism.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	0	0	0	No significant impact
2(b) Provide access to green spaces	√	√	√	Historic parks and gardens help provide access to green spaces.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	0	0	0	No significant impact
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	0	0	0	No significant impact
3(b) Protect and enhance landscapes	√	√	√	Historic parks and gardens contribute to landscape quality.

3(c) Conserve and where appropriate, enhance the historic environment	√ √?	√ √?	√ √?	The aim of this policy is to protect the historic environment. However there are several elements of the historic environment not addressed. The preamble accepts this but notes (4.18) " you will not find policies on Listed Buildings, Conservation Areas or Ancient Monuments, for example, because these are adequately protected elsewhere." However, although PPG15 does contain a national policy framework for protecting the historic environment, it seems that it would be at least helpful and possibly of positive benefit to include information about protection of listed buildings, conservation areas, ancient monuments and archaeological sites. On archaeological sites specifically PPG16 requires local development plans to include "policies for the protection, enhancement and preservation of sites of archaeological interest and their settings". (para 15). The Core Strategy and Development Policies do not clearly do that.
3(d) Reduce pollution from any source	0	0	0	No significant impact
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	0	0	0	No significant impact
4(b) Improve the District's ability to adapt to climate change	0	0	0	No significant impact
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	0	0	0	No significant impact
5(b) Provide access to services and facilities for all	0	0	0	No significant impact
5(c) Promote community cohesion	?	?	?	Key historic buildings may contribute to community identity.
5(d) Increase access to decent and affordable housing	0	0	0	No significant impact
5(e) Reduce crime rates and fear of crime	0	0	0	No significant impact
5(f) Improve conditions and services that engender good health and reduce health inequalities	0	0	0	No significant impact
5(g) Increase participation in education and life-long learning	0	0	0	No significant impact
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	?	?	?	Depends on usage of the buildings at present. Impact of policy unlikely to be significant
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	0	0	0	No significant impact
6(b) Reduce waste	0	0	0	No significant impact
<b>TOWN CENTRES</b>				
7 Promote sustainable	√	√	√	The historic environment contributes to

urban living				the quality of the public realm in towns.
<p><b>Conclusions</b></p> <p>The policy provides protection to elements of the historic environment, however, there are other aspects not addressed. The preamble accepts this but notes (4.18) " you will not find policies on Listed Buildings, Conservation Areas or Ancient Monuments, for example, because these are adequately protected elsewhere." However, although PPG15 does contain a national policy framework for protecting the historic environment, and elements such as listed buildings are adequately addressed through existing procedures, it seems that it would be at least helpful and possibly of positive benefit to include information about protection of listed buildings, conservation areas, ancient monuments and archaeological sites. On archaeological sites specifically PPG16 requires local development plans to include "policies for the protection, enhancement and preservation of sites of archaeological interest and their settings". (para 15). The Core Strategy and Development Policies do not clearly do that.</p> <p><b>Uncertainties</b></p> <p>No significant uncertainties identified</p> <p><b>Recommendations/Mitigation</b></p> <ul style="list-style-type: none"> <li>• Provide information within the preamble on the systems in place for the protection of the elements of the historic environment not addressed in the policy.</li> <li>• Consider whether particular elements such as archaeological sites need to be specifically protected in the policy itself.</li> </ul> <p><b>NHDC Response</b></p> <p>We will expand the supporting text to point to other sources of policy.</p> <p>On archaeology, we will add a reference so that sites can continue to be identified on the proposals maps, although the substance of the protection will remain in PPG16.</p>				

## Infrastructure and delivery

### Infrastructure & Delivery Policy ID1: Infrastructure Requirements and Developer Contributions

The Council will require development proposals to make provision for infrastructure that is necessary in order to accommodate additional demands resulting from the development.

The Council will require developers to provide and/or finance or contribute towards the cost of provision which is fairly and reasonably related in scale and kind to the development, for:

1. On-site and/or off-site improvements and infrastructure necessary as a result of the development in order to:
  - a. Avoid placing additional burden on the existing community;
  - b. Mitigate adverse impacts; and/or
  - c. Enhance critical assets or make good their loss or damage.
2. Maintenance and/or operating costs of new provision.

New infrastructure to support new development must be operational no later than the completion of development or phase in which it is needed, unless otherwise agreed.

Proposals will be assessed on a site-by-site basis having regard to specific circumstances and the Infrastructure Delivery Plan. Guidance in relation to planning obligations and any Community Infrastructure Levy which may be introduced will be set out in the Council's Community Infrastructure Charging Schedule and/or Developer Contributions Supplementary Planning Document. The Infrastructure Delivery Plan refers to key infrastructure projects relating to growth that this policy seeks to help to deliver.

The Council will work with landowners, developers and other agencies in facilitating the delivery of sites identified in the Local Plan and seek to overcome known blockages.

Where viability issues impact the delivery of key infrastructure and/or mitigation measures, the Council will determine which requirements are most critical to securing development and meeting the overall vision and objectives of this plan. The Council will take this into account as a material consideration and assess any implications on a case-by-case basis. Where an applicant seeks to reduce the contributions sought the onus is on them to demonstrate that the Council's policies have reduced the viability of the scheme to the extent that it is unlikely to be delivered.

*The appraisal of an earlier version of this policy is shown below.*

#### **10: Planning obligations**

Development proposals will be required to make provision for infrastructure, services and community facilities that are necessary in order to cope with additional demands brought on by the development and offset any harmful effects to the natural, historic or built environment. In assessing need, the cumulative impact of a number of developments will be taken into account so that the costs of impacts can be spread proportionately. Developers will be required to provide and/or finance the cost of provision which is fairly and reasonably related in scale and kind to the development, for:

1. On-site and/or off-site improvements, infrastructure, services and facilities necessary as a result of the development in order to:
  - a. Avoid placing additional burden on the existing community;
  - b. Mitigate adverse impacts; and
  - c. Make good or enhance the loss or damage of critical assets
2. Maintenance and/or operating costs of new provision through pump priming or for as long as is necessary where facilities are provided that are predominantly for the benefit of the users associated with the development.

The range of infrastructure, facilities and services that are likely to be sought, standards for calculating requirements and other guidance relating to planning obligations are set out in the Council's Planning Obligations Supplementary Planning Document (Date to be inserted). Development Proposals will need to demonstrate that they have had regard to this SPD. Implementation will be secured either through planning obligations or planning conditions

attached to the planning permission, whichever is appropriate.				
<b>[N.B. This policy supports the consultation draft SPD on planning obligations which sets out detailed requirements and guidance. The SPD has already been subject to appraisal. The appraisal of this policy is therefore intentionally broad and does not cover the specific requirements contained in the SPD]</b>				
	<b>What is the predicted effect on each SA objective?</b>			<b>Justification for assessment and recommendations for mitigation/improvement</b>
<b>SA Objectives</b>	<b>Short term</b>	<b>Med term</b>	<b>Long term</b>	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	?	√	√	The short term effects of the SPD are somewhat uncertain. Introducing standards for calculating developer contributions may, in the short term, lead to a reduction in developer interest, which could have negative economic effects. However, in the medium to long term, any necessary adjustments in land values would have been made. The SPD encourages developer contributions for various measures to promote economic development, including local labour and training initiatives, flexible and start-up units and work/live units.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	0	0	0	No significant impact
2(b) Provide access to green spaces	?	√	√ √	The SPD sets standards for contributions towards open space, outdoor sport and recreation. In the medium to longer term the policy and accompanying SPD will lead to more provision of footpaths and open spaces.
2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	?	√	√ √	The SPD sets standards for contributions towards sustainable transport.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	?	√	√	The SPD includes guidance on negotiating contributions towards environmental mitigation measures.
3(b) Protect and enhance landscapes	?	√	√	The SPD includes guidance on negotiating compensation contributions for the loss of or damage to sites with landscape value.
3(c) Conserve and where appropriate, enhance the historic environment	?	√	√	The SPD includes guidance on negotiating compensation contributions for the loss of or damage to sites with historic value.
3(d) Reduce pollution from any source	?	√	√	The SPD sets standards for contributions towards sustainable transport. This is likely to have some positive effect on noise and other pollution from motor vehicles.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	?	√	√	The SPD sets standards for contributions towards sustainable transport. This is likely to have some positive effect on greenhouse gas emissions from motor vehicles. In addition, the SPD includes guidance on negotiating contributions towards sustainable construction, which will lead to lower energy use and reduced

				emissions.
4(b) Improve the District's ability to adapt to climate change	?	√	√	The SPD includes guidance on negotiating contributions towards flood protection measures.
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	?	√	√ √	The SPD includes standards and guidance for contributions to a wide range of measures which will address regeneration issues and provide employment opportunities, including the provision of affordable housing, community facilities, education and economic development initiatives.
5(b) Provide access to services and facilities for all	?	√	√ √	The SPD includes standards and guidance for contributions to a wide range of measures which will enhance access to services, including the provision of community facilities, education, childcare and sustainable transport.
5(c) Promote community cohesion	?	√	√ √	The SPD sets standards for contributions towards community centres and town and village halls, and includes guidance for contributions towards other community facilities.
5(d) Increase access to decent and affordable housing	?	√	√ √	The SPD sets standards for contributions towards affordable housing. The setting of standards is likely to provide more effective and quicker agreements on affordable housing than the previous system of negotiating on a site-by-site basis.
5(e) Reduce crime rates and fear of crime	?	√	√	The SPD sets standards for contributions towards the public realm, which may contribute to addressing crime and community safety issues.
5(f) Improve conditions and services that engender good health and reduce health inequalities	?	√	√	The SPD sets standards for contributions towards community and leisure centres, open space, outdoor sport and recreation, as well as contributions towards fire and rescue. It also provides guidance on contributions towards any additional health and social services which might be necessary as a result of development.
5(g) Increase participation in education and life-long learning	?	√	√ √	The SPD sets standards for contributions towards education.
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	?	√	√ √	The SPD sets standards for contributions towards community and leisure centres, open space and outdoor sport and recreation.
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	?	√	√	The SPD includes guidance on negotiating contributions towards sustainable construction, which will lead to lower energy use and more efficient use of raw materials.
6(b) Reduce waste	?	√	√	The SPD sets standards for contributions towards waste collection and recycling.
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	?	√	√	The SPD sets standards for contributions towards improving the public realm.
<b>Conclusions</b>				
This policy, along with the accompanying SPD to which it refers, is likely to have a significant positive impact on most SA objectives. Although there are uncertainties about the short term effects, in the medium and long term the setting of standards for calculating contributions is likely				

to result in more and better agreements being reached with developers, and therefore increased

### Uncertainties

There are some uncertainties about the short term effects of introducing standards for calculating contributions. However, it is likely that in the medium to long term, any necessary adjustments in land value would take place in order to adapt to this situation.

### Recommendations/Mitigation

This is an important policy in sustainability terms but the uncertainty surrounding the impacts means that the effects should be subject to very careful monitoring at least in the short term.

### NHDC Response

The impacts of this policy will be carefully monitored and will be reported on an annual basis. Section 8 of the accompanying SPD refers to the need for monitoring. This will include information on agreements reached, contributions received and expenditure.

## Infrastructure & Delivery Policy ID2: Masterplans

The Council will prepare masterplans for the following sites:

- North of Baldock;
- North of Letchworth;
- East of Luton; and
- North of Stevenage.

Should development prove necessary in the plan period to the west of Stevenage a masterplan will also be prepared for that site.

Masterplans will be supplementary planning documents, to be prepared in partnership between the Council and with landowners, developers, other local authorities and service providers, and involving the community.

Masterplans will consider matters such as:

- The level of infrastructure and facilities necessary to support the development;
- Opportunities to provide employment generating development on the site;
- The amount and function of open space;
- How the development relates to existing communities;
- How the new community will be encouraged to develop its own sense of identity;
- The opportunities to incorporate large scale low carbon energy schemes; and
- The opportunities for some plots on the site to be made available for self-build housing.

	What is the predicted effect on each SA objective?			Justification for assessment and recommendations for mitigation/improvement
SA Objectives	Short term	Med term	Long term	
<b>ECONOMIC ACTIVITY</b>				
1 Achieve sustainable levels of prosperity and economic growth	√	√	√	Masterplans for these large sites are likely to ensure that appropriate facilities are provided to support some new businesses and generate employment.
<b>LAND USE AND DEVELOPMENT PATTERNS</b>				
2(a) Minimise the development of greenfield land and other land with high environmental and amenity value?	0	0	0	No significant impact
2(b) Provide access to green spaces	√	√	√	Masterplans will ensure appropriate provision of green space



2 (c) Deliver more sustainable location patterns and reduce the use of motor vehicles	?	√	√ √	Appropriate provision of local facilities should reduce the need to travel. No specific mention is made of sustainable transport provision.
<b>ENVIRONMENTAL PROTECTION</b>				
3(a) Protect and enhance biodiversity	?	?	?	No specific mention is made of biodiversity issues.
3(b) Protect and enhance landscapes	?	?	?	No specific mention is made of landscape issues.
3(c) Conserve and where appropriate, enhance the historic environment	?	?	?	No specific mention is made of historic environment issues.
3(d) Reduce pollution from any source	?	?	?	No specific mention is made of pollution issues, for example protecting water and groundwater quality and addressing noise issues.
<b>CLIMATE CHANGE</b>				
4(a) Reduce greenhouse gas emissions	√	√√	√ √	Masterplans for these large sites will ensure that appropriate planning is undertaken to establish low carbon energy schemes, which should be able to make a significant contribution to renewable energy provision.
4(b) Improve the District's ability to adapt to climate change	?	?	?	Masterplans should address flooding issues, including surface water flooding. Provision of green infrastructure within open space and the use of SuDS will contribute to addressing these issues and also contribute to making the developments resilient against increased temperatures.
<b>A JUST SOCIETY</b>				
5(a) Share benefits of prosperity fairly	√	√	√	Masterplans for these large sites are likely to ensure that appropriate facilities are provided to and generate employment.
5(b) Provide access to services and facilities for all	?	√	√	Appropriate provision of local facilities should provide access to services for all.
5(c) Promote community cohesion	√	√	√	The development of these large urban extensions could have a significant effect on existing residents. Masterplans have an important role to play in ensuring that this effect is minimised and ideally that the developments provide a positive benefit through ensuring that the services are accessible to existing residents, and the design and layout of the site minimises impacts. They will also help in developing community identity. The policy notes that there will be community involvement in developing the plans.
5(d) Increase access to decent and affordable housing	?	√	√	Support for self-build is likely to support accessibility of affordable housing.
5(e) Reduce crime rates and fear of crime	?	?	?	Appropriate design through the masterplan process should consider how to design out crime.
5(f) Improve conditions and services that engender good health and reduce health inequalities	?	√	√	The masterplanning process will ensure provision of appropriate health services.
5(g) Increase participation in education and life-long	?	√	√	The masterplanning process will ensure provision of appropriate education

learning				services.
5(h) Maintain and improve culture, leisure and recreational activities that are available to all	?	√	√	The masterplanning process will ensure provision of appropriate recreation and cultural services.
<b>RESOURCE USE AND WASTE</b>				
6(a) Use natural resources efficiently; reuse, use recycled where possible	?	√	√	The masterplanning process should address such issues as water efficiency, sustainable construction and sustainable design, though these are not specifically mentioned.
6(b) Reduce waste	?	?	?	The masterplanning process should make appropriate provision for recycling, though this is not specifically mentioned.
<b>TOWN CENTRES</b>				
7 Promote sustainable urban living	?	√	√	The masterplanning process will ensure appropriate provision of facilities, and should also ensure that the developments don't compete with town centre.
<p><b>Conclusions</b>  This policy is likely to have a significant positive impact on most SA objectives. The masterplanning process is likely to facilitate provision of employment, community facilities, greenspaces and to encourage community cohesion and reduce potential social and environment effects of such large developments.</p> <p><b>Uncertainties</b>  The effects of this policy will depend on the detail of the masterplans themselves.</p> <p><b>Recommendations/Mitigation</b>  It is acknowledged that the masterplans will need to respond to a number of plan policies including those which cover protection of biodiversity, landscape and the historic environment and the provision of green infrastructure. However given the size of the developments and their potential effects on the local environment, it might be helpful to specify that the masterplans would address these issues.</p> <p><b>NHDC Response</b>  The recommendations have been incorporated into the list at the end of the policy.</p>				

