Appendix 4

Schedule of recommended changes to the Sustainability Appraisal Scoping Report

Note: Further changes will be made to the Sustainability Scoping Report to reflect the changes recommended to the draft vision and objectives.

Respondent	Summary of Comments	Response
STATUTORY CONSULTEES FOR THE PURPOSES OF SA/SEA		
Environment Agency	**CHAPTER 3: BASELINE INFORMATION – CLIMATE CHANGE MITIGATION AND ADAPTATION** See the preparation of this Joint Strategic Plan, including the Sustainability Appraisal, as a key opportunity to strengthen the role that the planning system plays in mitigating and adapting to climate change, and to ensure a fair transition to a low carbon economy. Local evidence of climate change impacts will be valuable towards identifying location specific vulnerabilities. The Sustainability Appraisal should also include mitigation (i.e. net zero) policy measures that may be required to further limit climate change, and associated flood risk and water resource issues arising from the changing climate and that we need to be much better prepared for. Reference should be made to the Strategic Flood Risk Assessments (SFRA) for each Local Authority, which are crucial evidence documents for understanding the impacts of climate change on all sources of flood risk over the anticipated lifetime of any proposed development. The EA's climate change allowances for flood risk assessments should inform the SFRA(s) and have been updated to reflect the UK Climate Projections 2018 (UKCP18). This information is available at https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances For information, the Royal Town Planning Institute (RTPI) and Town and Country Planning Association (TCPA) have produced guidance on 'The Climate Crisis – A Guidance for Local Authorities on Planning for Climate Change'. Available at:	Noted. The SA Scoping Report will be updated to include the additional publications referenced. In addition, the baseline information regarding flood risk, water and biodiversity will be updated based on the comments referenced. Flooding will be included as a separate sustainability issue and Sustainability Issue 13 will be updated to include reference to chalk streams. The Sustainability Appraisal framework will be updated to incorporate further appraisal questions as set out by the Environment Agency.

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	https://www.rtpi.org.uk/media/9379/tcpa-rtpi-climate-guide_oct-2021_final.pdf **CHAPTER 3: BASELINE INFORMATION - FLOOD RISK** Welcome the inclusion of paragraph 3.13 concerning the impact of new development on flood risk. We recommend the inclusion of separate sections for the different types of flooding i.e., fluvial, surface water, and groundwater flooding. **Fluvial flood risk** In regard to fluvial flooding, it is important to note that flood risk mitigation can also be achieved by following a sequential approach as outlined in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). This is to steer new development to areas with the lowest risk of flooding and ensure that the most vulnerable developments are located in the areas with the lowest risk. This will also minimise the future necessity for new or improved carbon-intensive flood defences. Where development is deemed to be necessary, it should be safe for its lifetime without increasing flood risk elsewhere. Where possible, opportunities for betterments should be sort, for example adding more space for water and adding future attenuation areas. Additionally, properties at the highest risk are those situated within the functional flood plain (Flood Zone 3b). Only Essential Infrastructure or Water Compatible uses may be considered in Flood Zone 3b. **Flood resistance and resilience** If alternative sites are not available to locate development away from areas at risk of flooding, then developments need to enact appropriate flood resilient and resistant measures. Guidance on flood resistance and resilience can be found at: • Government guidance on flood resilient construction https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings • CIRIA Code of practice for property flood resilience https://www.ciria.org/CIRIA/Resources/Free_publications/CoP_for_PFR_resource.aspx • British Standard 85500 – Flood resistant and resilient construction	

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	https://www.floodguidance.co.uk/bs-85500/ **PPG – Flood Risk and Coastal Change** The PPG guidance on Flood Risk and Coastal Change was updated in August 2022 and provides comprehensive advice on a number of considerations. For example, additional guidance has been provide to clarify the sequential test approach; how to use natural flood management techniques; and the use of Sustainable Urban Drainage Systems (SuDS). Additional advice is also available on the Strategic Flood Risk Assessment (SFRA) and assessment of infrastructure needs, and how to take an integrated approach to flood risk management. This guidance is available online at https://www.gov.uk/guidance/flood-risk-and-coastal-change **Buffer zones** In reference to paragraph 3.13, the EA are pleased to see the link has been made between the loss of greenfield land and the increase of flood risk. Development in the green belt leading to loss of habitat and flood water storage should be strongly resisted, and brownfield sites prioritised over greenfield. To strengthen this position, we recommend the inclusion of the following: 'leaving appropriate undeveloped buffer between river and development can reduce the flood risk of the development and its vicinity. This can also eliminate the need for a Flood Risk Activity Permit.' For development within close proximity to a main river, the EA would be looking for a commitment for a natural undeveloped 8 metre buffer between all new development and the top of riverbank / flood defence / culvert. This should be free from hard standing and structures. Note that Flood Risk Activity Permits are required for certain activities, such as works/development within close proximity to a main river. Full guidance is available at https://www.gov.uk/guidance/flood-risk-activities-environmental-permits **CHAPTER 3 – BASELINE INFORMATION: WATER** **Water Framework Directive** In reference to paragraph 3.50, they are pleased to see that reference has been made to the Water Framework Directive and note that these regulations are also referenced in Appendix A (paragraph A.52). WFD requirements will	

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	need to be considered in the Sustainability Appraisal and throughout the development of the Joint Strategic Plan. Local Planning Authorities have an important role in implementing the WFD and making sure new development does not cause deterioration and whenever possible supports measures to improve waterbodies. **Chalk streams and Chalk aquifers** In reference to paragraph 3.51, the EA are pleased to see acknowledgement of the importance of Chalk Streams. However, paragraphs 3.47 - 3.51 do not identify the presence of the Chalk bedrock, which is a principal aquifer and the source of regional potable supply along with providing baseflow to surface waters, such as chalk streams. It is important to note that the Upper Colne and some of the smaller tributaries, such as the Mimmshall Brook, also run over the chalk bedrock and should be considered chalk streams. There are more than three chalk streams within South West Herts, the ones named are only the larger ones. The River Colne Catchment Action Network (ColneCAN) are the catchment hosts for the Colne, of which the Chilterns Chalk Streams Project are a partner/co-host with Groundwork South and the Colne Valley Regional Park. The partnership brings together stakeholders of all kinds to support the conservation and restoration of the Colne Catchment. There are six main goals identified across the catchment; control invasive species, involve people in their local waterbodies, improve wildlife corridors, improve water quality, manage flow, and work together. More information on ColneCAN is available at: http://www.colnecan.org.uk/. **Localised evidence bases relating to water resources and quality** Water Cycle studies and Infrastructure Delivery Plans are important for informing water resources and water quality policies. Guidance is available at: https://www.gov.uk/guidance/water-cycle-studies River Basin Management Plans - The Sustainability Appraisal should also consider the current classification of waterbodies and how to improve their ecological health and chemical status, as set out by the objectives of the Thames River Basin Management Plan (TRBMP).	

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	Water Resources Management Plans (WRMPs) assess pressures on future water supplies. WRMPs are an essential evidence source for ascertaining water availability within the context of climate change. Water company drainage and wastewater management plans account for climate change, ensuring drainage infrastructure can cope with increased intensity of storms. The Environment Act (2021) has made these plans statutory, collaborative and they should be integrated into long term planning documents such as the JSP. Water stress areas – their evidence on water stress should be referred to in consideration of water efficiency requirements. Available at: https://www.gov.uk/government/publications/water-stressed-areas-2021-classification **CHAPTER 3 – BASELINE INFORMATION: BIODIVERSITY** In reference to Chapters 3.57 - 3.61, we welcome comments referencing the main priority habitats within the area. However, we note no reference has been made to the main priority/protected species. For example, Water Vole (Arvicola amphibious) have been reintroduced to the St Albans District. Work by the combined effort of Herts and Middlesex Wildlife Trust and the Colne Valley Fisheries Consultative has shown that this species is more widespread than initially realised, with a good population found in the Rickmansworth area. This species is iconic to chalk streams and should be protected along with the priority habitat. Additionally, no reference has been made to the impacts of invasive species within the area. This information should be included in the Sustainability Appraisal. **CHAPTER 4: KEY SUSTAINABILITY ISSUES AND THEIR LIKELY EVOLUTION WITHOUT THE JSP** Agree with the numerous sustainability issues recognised in this chapter. However, they have the following comments to make in regard to Issues 1, 3 and 13. **Sustainability Issue 1** Note that flood risk is mentioned in Issue 1 in respect of the impacts of climate change. However, climate change should be linked more directly to an increase in flooding, especially since people who are not at risk now may become at risk in the future. Strongly recommend that flooding is put forward	

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	as being a separate sustainability issue, and the potential increase in the risk of flooding through development should be highlighted as a key concern. This is in line with paragraph 153 of the NPPF (July 2021). **Sustainability Issues 3 and 13** Regarding Issue 3 which considers access to natural green space, and Issue 13 on the potential to harm local landscape, they recommend reference is made to the lack of connection to river corridors and engagement with communities and rivers and the wider water environment. Specifically in respect of Issue 13, adding a reference to the protection of chalk streams would be beneficial. **CHAPTER 5: SUSTAINABILITY APPRAISAL FRAMEWORK** This next section considers the Sustainability Appraisal (SA) objectives that fall within the EA's remit and that have been identified through this Scoping Report. **SA Objective 1: To minimise SW Hertfordshire's contribution to climate change and build resilience for adaptation to the changing climate** Pleased to see a strong vision and strategic objective on climate change mitigation and adaption. Significant climate impacts are inevitable, especially on several constraints within our remit, such as flood risks, water management, freshwater wildlife and industrial regulation. In regard to climate change resilience, we encourage the use of nature-based solutions (NbS) to support local environments in becoming more resilient to climate impacts, such as flooding, drought and overheating, and absorb and store greater quantities of carbon. Without that resilience, there is a risk that progress on net zero will be undermined. **SA Objective 3: To improve the health and wellbeing of SW Hertfordshire's population** Strongly support the consideration of maintaining, connecting and creating multifunctional open spaces and green infrastructure. We encourage that this is considered alongside natural flood management approaches, such as river restoration, the protection of existing assets, as well as the discouragement of culverting. In regard to encouraging and facilitating walking and cycling, they recommend consideration is given to enhancing green corridor networks and local nature recovery networks.	

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	For information, Public Health England have produced guidance on improving access to greenspace, in the context of protecting and improving health and wellbeing. This document is accessible online at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904439/Improving_access_to_greenspace_2020_review.pdf **SA Objective 7: To reduce the need to travel by car** As mentioned in reference to Objective 3, the provision of new cycling and walking infrastructure should also seek to maximise opportunities to integrate connected green and blue infrastructure along transport corridors. **SA Objective 8: To minimise air and noise pollution in SW Hertfordshire** Recommend the inclusion of approaches to waste management when considering the reduction of air, noise, and odour pollution. For example, improved efficiency and compliance by regulated facilities will decrease emissions of pollutants, as well as greenhouse gas emissions, in particular carbon dioxide from combustion. **SA Objective 9: To maintain and enhance water quality and quantity** Considering the question of how to help safeguard the water quality and ecological integrity of waterbodies, they recommend consideration is given to the Thames River Basin Management Plan (TRBMP). The TRBMP requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery, including that of groundwater bodies (GwB). This is consistent with the SA Objective 9. The relevant GwBs within the area of the JSP are: • Mid-Chilterns Chalk - Classification Poor • Upper Lee Chalk - Classification Poor • Radlett Tertiaries - Classification Poor • Chiltern Chalk Scarp - Classification Poor • Upper Bedford Ouse Chalk - Classification Poor Welcome the acknowledgment in in SA Objective 9 regarding appropriate development in Source Protection Zones (SPZs). Particular care should be taken regarding the types of developments considered within SPZ1, which are generally the most sensitive locations with respect to potable supplies. It is important to note that the distribution of SPZ1s is not uniform, for example a	

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	significant area of Hertsmere District B lies within an SPZ1, as does Watford District B and Three Rivers District. Due to the scale of this JSP, they consider it to provide an excellent opportunity to identify the less sensitive groundwater areas to develop. **SA Objective 10: To reduce the risk from all sources of flooding in SW Hertfordshire** Welcome the questions put forward regarding flood risks. Please ensure that all flooding related guidance; including the relevant paragraphs of the National Planning Policy Framework and the relevant chapter of the planning practice guidance (PPG) are considered. In addition, up-to-date climate change data should be used to inform assessments and plans around flood risks. The EA have powers over and responsibilities for watercourse management, including working on main rivers and managing flood risk. Therefore, new development should not restrict access to main rivers and flood defence assets. As a minimum, we will be looking for an 8 metres undeveloped buffer zone to facilitate this access. Opportunities to de-culvert watercourses and remove obstructions to flow and fish passage should be pursued. Additionally, reconnecting to the floodplain by softening banks and allowing rivers to expand where possible and appropriate, may provide natural storage upstream of towns at risk. Considering the question of how to help promote the use of SuDS and flood resilient design, they agree there are multiple benefits from SuDs, including for water quality. However, careful consideration must be given to their location and design. Proposals involving infiltration SuDs in SPZ1 must be supported by a hydrogeological risk assessment. Whilst not mentioned explicitly, of particular concern are the use of deep borehole soakaways. They concentrate the discharge on location and bypass the soil layers, which limits the ability of the ground to attenuate pollutants and presents a greater risk of groundwater pollution. When considering drainage schemes, every effort should be made to ensure that alternative drainage options are used. **SA Objective 11: To protect SW Hertfordshire's soils and ensure efficient use of land**	

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	Considering the question of how to take an appropriate approach to remediating contaminated land, they are happy to see the remediation of land acknowledged in SA Objective 11. Would like to clarify that remediation should ensure that it is 'suitable for use', which means suitable for the environment as a whole, and not just for use by people. Protecting groundwater and surface water may mean carrying out work on land affected by pollution over and above that required to make the land suitable for the proposed development and to protect human health. When dealing with land contamination the process set out in Land contamination risk management (LCRM) should be followed. Available at: https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm **SA Objective 13: To conserve and enhance SW Hertfordshire's biodiversity and geodiversity** Strongly support the objectives to conserve, connect and enhance ecological networks, and to achieve biodiversity net gain. Biodiversity net gain offers considerable scope to help create resilient places, through maximising opportunities to improve the water environment, manage flood risk and addressing climate risks. This should be considered alongside efforts to help tackle climate change, such as nature-based solutions. Furthermore, it is expected that Local Nature Recovery Strategies will be used to help inform how and where biodiversity net gain should be delivered. As mentioned earlier in this response letter, we encourage the protection of the area's chalk streams, which are a priority habitat, are considered and incorporated into the Sustainability Appraisal.	
Natural England	Natural England broadly agrees with the conclusions of the Sustainability Appraisal Scoping Report. The report assesses the potential impacts associated with six different growth types: The report states that "Growth types c, d and g are likely to have the most potential negative effects because they may result in more new growth across the more rural areas of the area, where environmental assets are more likely to be adversely affected and where accessibility may be less good and levels of car use higher." Natural England advises that any growth type should seek to	Support noted. The Scoping Report will be updated to include additional references to chalk streams and reference to the recreational pressure on the Chilterns Beechwoods SAC will be included where appropriate. It should be noted that a separate

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	minimise impacts on environmental assets (including habitat loss and greenbelt impacts) and be directed towards the most sustainable locations. Denser development in urban areas and/or around sustainable transport nodes would make district heating easier and use less energy per dwelling than lower density communities. This, combined with the reduced need to travel, would likely result in significant positive effects from Growth Types a, b, e and f on SA objective 1 (climate change). This has the potential to help minimise negative effects on biodiversity assets and achieve the more efficient use of land." Given the strong focus on climate change within the JSP, Natural England suggests that any growth type that has significant positive effects for this objective should be given greater weight. However, Growth Type b in particular is still likely to result in large urban extensions at existing settlements, resulting in the loss of greenfield land. Furthermore, the densification of existing centres could result in fewer green spaces in and around urban areas, with associated losses of biodiversity. Natural England would stress that any growth type must be sustainable and ensure positive outcomes for the environment. Would not support a growth type that reduces the availability of greenspace and leads to losses in biodiversity. Growth Types d and g could result in growth within the rural areas of SW Hertfordshire away from the main service centres. As such, it is likely these Growth Types will utilise more greenfield land for development compared to the other Growth Types, resulting in less efficient use of land and greater potential for the loss of habitats. In addition, there are many Local Wildlife Sites, patches of Ancient Woodland, Local Nature Reserves and SSSIs that could be adversely impacted by development in the rural areas of the area, resulting in the potential for significant negative effects on SA objectives 11 (soils) and 13 (biodiversity). Similar to Growth Types d and g, Growth Type c is likely to utilise Page 8 of 8 more greenfield land for new settlements compared to the other Growth Types, resulting in less efficient use of land and greater potential for the loss of habitats. Natural England would like to see a strong commitment to protection and enhancement of existing greenspaces, protected sites and local nature sites, including ambitions to develop and expand the nature recovery network. Any growth type must align with the commitments of the Environment Act. The report states that the JSP will "provide an opportunity to encourage better and	Habitats Regulations Assessment (HRA) will be commissioned as part of the JSP process.

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	more sustainable use of water resources". Natural England supports the principle of this but we would want the wording to be strengthened from "encourage" as this is likely to be insufficient in such a populated area with high growth pressure. As mentioned above, rare chalk stream habitats are already at risk from over abstraction and this is likely to increase in the future. This strengthening of language should be applied across the Plan to ensure a greater commitment to environmental targets. The report should also make greater reference to the risk of drought, particularly given the current pressures on water resources and the impacts of climate change. The report makes reference to the impacts associated with air quality – particularly in relation to transport. This should also consider air quality impacts from other sources, such as construction and agriculture. Note the reference to the Chiltern Beechwoods SAC and recreational pressure. This will need to be considered within the Sustainability Appraisal as it's a key issue within South West Hertfordshire (refer to section on designated sites for more information). The Report acknowledges that the impacts of the JSP will need to be reviewed in isolation as well as in-combination. This is strongly encouraged and the report should take a holistic approach, with clear links between themes, acknowledging the multifunctional benefits associated with a healthy environment.	
Historic England	Encourage local authorities to work with local conservation officers, archaeology officers and local heritage community groups in the preparation of the Sustainability Appraisal. Our advice note provides more guidance to developing a robust sustainability appraisal framework.	Noted.
OTHER SPECIFIC CONSULTATION BODIES		
Hertfordshire County Council - Minerals and Waste Team	Glad to see the inclusion of SA Objective 12: To safeguard SW Hertfordshire's mineral resources.	Support noted.

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Croxley Green Parish Council	Question what 'sustainable growth' means? Considers this is an oxymoron and no amount of analysis can paper over the fact that the level of development within SW Herts is already unsustainable in the longer term. Chapter 2 sets the "policy context" for the JSP and demonstrates that there is already a plethora of plans. What targets have been set within them, how are they measured and monitored, and where are they reported? Chapter 3 sets out the "baseline information" but with differing perspectives leads to inevitable conflicts. The conflict between national statistics and the Government's policy framework on the need (the unsustainable need) for local housing is evident. There is no analysis of occupancy levels in existing housing – neither of overcrowding, nor of "under occupancy" (implying waste) in the existing stock. (An issue of inequity) Some of the data presented is very out of date (2011 census) and, in some places, there are no comparisons between local and national data trends. (e.g. pregnancy and maternity) Paragraph numbering goes awry after 3.44 The river CHESS is omitted from para 3.51(sic) Chapter 4 lists 13 "sustainability" issues. How many of these are (a) national issues, (b) purely local issues and (c) directly incompatible with one another? What are the relative priorities between them? Stresses the Importance of getting the right appraisal framework (asking the right questions, setting the right priorities), as the results of any appraisal process will confirm any biases built into the framework and the questions. Given that the current development pattern within SW Herts is already unsustainable this approach is simply tinkering with the problems. An alternative approach should be based on a planning for a sustainable future WITHIN the environmental constraints and our geographic and administrative area.	Noted. Chapter 2 of the SA report sets out the JSPs relationship with other relevant plans and programmes and outlines environmental protection objectives at international and national levels, as required by the SEA Regulations. It is not the role of the SA to seek to report on how these are measured, reported and monitored. The baseline information will be updated with the most up to date evidence in every iteration of the SA report. The SA does not itself assess issues such as occupancy levels of existing housing. These are matters for specific technical studies such as Local Housing Needs Assessments, which will inform future stages of the JSP process. Any such evidence will be reflected in the SA baseline where relevant.
Tring Town Council	Document is too technical at this point and need budgetary and implementation data to give proper feedback.	Noted. The SA Scoping Report is by its very nature a technical document. Its content will expand as it is updated through the plan-preparation process. Budgetary and

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		implementation data does not form part of the SA Reporting process.
GENERAL CONSULTATION BODIES		
Save Our Shenley	The response of Hertfordshire County Council officers and Hertsmere Borough planning and environmental health officers in terms of upholding the policy direction of SW Hertfordshire stated on your webpage -"The onus will be to encourage people to avoid using their cars, while ensuring that there are realistic and affordable alternative ways to move around" has been very poor to date (see planning application reference 22/0971/OUT). Would also like: 1. a commitment to go above and beyond minimum policy requirements i.e. regarding the approach to biodiversity offsetting; and 2. a greater commitment to localism. When a community has expressed its views in sufficient numbers, the council should take this on board There is massive support for sustainable development and huge anger building about the continued development of green belt land in unsustainable locations.	Noted. These are matters to consider through the JSP itself, rather than the SA Report.
Look After Nature, Ridgeway Residents	Main issue is that the supposed demand for housing is based on 2014 data. The answer is not to decimate green belt to let more and more people live there but to make the places that people are trying to leave, more attractive. Should make better use of existing small green spaces within towns and change planning policy so that gardens are not decimated by development, turned into areas devoid of any wildlife habitat and corridors closed off my gravel boards. The most acceptable development would be to improve existing building stock and or convert to smaller, more affordable units.	Noted. Comments relate to general planning issues rather than anything specific within the SA Scoping Report
RESIDENTS / INDIVIDUALS		
Kenneth A Gallagher	Questions what 'sustainable growth' actually means. Concerned that the amount of detail in the report is simply concealing the fact that SW Herts is already unsustainably overdeveloped. Some of the baseline data is already out of date. The paragraph numbering breaks down at 3.44. The River Chess has been omitted from the chalk stream listed in para 3.51.	Noted. With or without the JSP, SW Hertfordshire will be subject to population growth and change. The role of the JSP is to ensure that this growth is carried out in as sustainable a manner as possible. There will always be tensions

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	Unclear how the long list of sustainability issues fits together and the relative priority between them. It is very important that the sustainability appraisal asks the right questions and sets the right priorities, otherwise it will not give a meaningful result when it is simply concealing the basis facts. As SW Herts is already unsustainably overdeveloped the propose analysis won't revel anything meaningful in terms of sustainability. There is a better, bottom-up approach, staring from the existing environmental constraints and social needs, as set out in 'Doughnut Economics' by Kate Rawoth. The starting point should be what is needed in SW Herts and what can be afforded in terms of the environmental constraints.	between growth and many of the sustainability objectives identified. The aim is to balance the often-conflicting objectives in the most appropriate way possible. The preparation of an SA report is an important (and statutorily required) tool to inform how best to achieve this balance. The baseline information will be updated with the mots up to date evidence in every iteration of the SA. Reference to the River Chess will be added to paragraph 3.51 and the paragraph numbering checked prior to final publication of the document. The content sand approach of SA Reports is set by the SEA Regulations.
Julia Battersby	Disappointed there is no data showing the basis upon which the Housing Projection Requirement was calculated including the number of disabled people requiring purpose built homes, the gap between social housing demand and supply, a breakdown of demand per year from people currently living out of county who take up residence in South West Herts and net loss of locals. Does not agree that development would create regeneration in deprived areas. In some it might and in many it will make matters worse. The Map of Areas of Multiple Deprivation is also misleading and over-states some areas of relative deprivation. For example, the large expanse of Batchwood Hall is shown as a relatively deprived area even though it is mainly farmland and a golf course. There is no consideration of the impact of previous proposals for the Chilterns to attain National Park Status. This would have an impact across areas of the South West including housing, transport and employment.	Noted, however the SA process is focused on assessing the JSP and many of the factors that are picked up in this comment go beyond the scope of the SA. For example, it is not relevant to the SA process to take account of proposals or to explain why certain trends such as relating to recycling may be occurring – as in many cases this is not known. Further to this, the suggested additions to the SA objectives are too detailed for inclusion in a SA

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	3.46 There is no indication of why recycling rates went down in some areas. Charities not accepting donations during early covid period or something else? 3.47 It would be helpful to know whether the report is referring here about actual consumption of water by households, or in general. Also would be helpful to have estimates of the amount used in industry/manufacturing, used in domestic consumption and lost through infrastructure failure such as broken pipes and leaks. 3.48. We have many natural springs throughout South West Herts and places where run off can be collected. The most obvious thing – planning for places where new reservoirs can be created is missing and should logically be part of a strategic area plan. 3.51. With many steep sided valleys in the vicinity, run-off of rain water and associated surface water flooding should be included here. Fig 3.8 Biodiversity. Shows designated Wildlife Sites but does not show high quality wildlife areas 1 and 2 as defined by Herts Records. Grade 1 areas should be set aside for protection and grade 2 as an opportunity for enhancement of biodiversity. Nor does this map show designated wildlife corridors which are also key to maintaining biodiversity. Historic Environment – does not include recognised World Heritage Award sites such as Apsley Paper Trail which potentially have international importance, or important Archaeological areas such as Roman settlements, or notable historic farming features such as fields with Saxon farming layouts and watercress beds. Landscape – The importance of preventing habitat fragmentation and loss of wildlife corridors should be highlighted here. 3.77 Fig 3.12 should state what the definition is of the areas that are not designated Green Belt or urban areas e.g. around The Gaddesdens. Assume it is rural? Comments on the SA Objectives as follows: – (9) Measures should help safeguard water quality and ecological integrity of the waterbodies including the chalk streams. – (10 & 11) to reduce flood risk consideration of measures to green areas on upper slopes of valleys particularly through increasing tree cover which slows down run-off	framework which is used to assess a strategic-level plan. It is also not possible to reference and map every single landscape / heritage / biodiversity designation within SW Hertfordshire. It is considered that the information currently included is proportional to the scope of the SA. The matters raised under Health Impact Assessments are not planning matters and therefore not suitable for inclusion in this report.

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	– (12) The strategic overview should identify future mission critical needs in the event of international or domestic interruption of supplies such as war e.g. minerals, food, key resources that we would locally need and how they could be transported in i.e. extreme contingency planning. – (13) Suggest this is amended to safeguard, expand and enhance SW Herts woodland. Planning that considers mitigating the emerging disease threats to trees such as Ash Dieback that could affect large areas of woodland and wood production would be a positive inclusion here. – (14) Include remnants of local historic industry, their settings and management practice within considerations for conservation. – (15) Would like to see that the characters of villages are preserved by maintaining some green space separation and rural/ semi-rural boundaries (e.g. ancient lanes with hedgerows) between one historical village and the next where it is still possible to do so. <u>Health Impact Assessment</u> Training and local retention of health and care staff is as key to providing efficient health facilities as providing surgeries for them to practice from. Consideration of Halls of Residence near our new hospital facilities for nurses for example, or preferential housing stock should be incorporated here. <u>Biodiversity</u> Often biodiverse zones are on the periphery of existing settlements, particularly those that have very old hedges and orchards. These old hedgerows are actually more important for the preservation of biodiversity and vulnerable wildlife than the field they enclose. The impact of biodiversity measures, greenspace and activities such as volunteering to maintain them all contribute to positive mental health which is a benefit not recognised here. 6.18 The impact of human behaviour and convenience should be considered e.g. although within walking distance the car is used on the school run Connectivity – need to take into account topography as cross valley travel transport is more challenging to individuals than movement from one end of a valley to the other. There are significant hills in many areas which can affect mobility of the elderly for example.	

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	Settlement types – using settlement types as a premise for planning is flawed as every settlement area has different features so should be looked at individually. Better to follow general principles for development e.g. 1) develop brownfield sites; 2) increase density only where the character of the area is not adversely affected 3) preserve semi-rural features of current green sites and settlement boundaries 4) identify sites suitable for infrastructure development e.g. solar power, waste removal, water provision, etc SA13 – add trees /tree lined verges to improve character There should be a clear requirement to establish an expectation that increasing biodiversity means preserving and enhancing vulnerable and uncommon native species, not substituting them with larger numbers of common species such as occurs when a few oak trees are planted after a hedgerow is removed. In doing the latter there may be a local (but meaningless) increase in biodiversity but on a county, national and international level it would be seen that we have brought about a decrease in overall biodiversity through loss of our rarer habitats and species. Page 135 Include to develop a native recovery network to protect and restore native wildlife including reintroductions e.g. water voles; and removal of invasive species such as Mink and Himalayan Balsam. General Note – the 500m exclusion zone around the Chiltern Beechwoods does not take account two key factors: 1) The impact that the vast number of people who travel in from as far afield as Luton. 2) That locals tend to respect and care for the local environment more than non-locals. I would argue that the exclusion zone should be increased to at least 1km and that Green Belt areas should be protected.	
Malcom Gesthuysen	Comments relating to perceived poor English, relating to compound modifiers and compound nouns lacking hyphens, missing and incorrect commas and incorrect / complex words.	As the questionnaire recognised, the SA Scoping Report is by its very nature is a technical document that uses specific terminology and wording that is not necessarily common. The final report will be

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		checked for grammatical errors and written in Plain English as far as is possible for a technical document. A non-technical summary will also be prepared to accompany the final SA report, in line with the requirements of the SEA Regulations.
Helena Holliday	There is an assumption that the population must grow. There is data that we will have less water than before. Hence, growth is unsustainable (Sustainability Issues 1 - Climate Change and 11 - Water). Urban heat island effect would accelerate climate change if further growth in population. Considers population growth is also unsustainable as: - Much of the county is Green Belt. - There is a deficiency in green space (3.26) and a desire to improve links to the West of the county. However, there is already pressure on the Chiltern Beechwoods Special Area of Conservation (SAC) in the West. Also, Sustainability Issue 13 refers to harm to the Chilterns Area AONB.	Noted. With or without the JSP, SW Hertfordshire will be subject to population growth and change. The role of the JSP is to ensure that this growth is carried out in as sustainable a manner as possible. There will always be tensions between growth and many of the sustainability objectives identified. The aim is to balance the often-conflicting objectives in the most appropriate way possible. The preparation of an SA report is an important (and statutorily required) tool to inform how best to achieve this balance.
Miklos Bansagi	More and better built bike lanes required, with existing ones needing better maintenance and connecting up to make them more suitable for use by commuters. Also need to be electric busses and separate bus-lanes to speed up journey and some bike storage next to bus shelters.	Noted. This comment relates to the general approach that needs to be taken to the future transport policies in the SW Herts JSP, rather than commenting specifically on the SA Scoping Report.
Jane Slatter	The response to COVID does not take into account the type of housing people now want because of the health and wellbeing problems of living in some dwellings (eg flats) during a pandemic.	Noted. The potential implications of Covid on how the future of SW Herts is planned is covered by the 'Our

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		World is Changing' section of the Realising Our Potential document. It is referenced in Sustainability Issue 8 regarding its impact on economic productivity, and the baseline will be updated to incorporate the various social and economic impacts.
Johnbelljubble	The report is very long and wordy. The key findings of the report could and should be summarised, and the information laid out in a format more easily accessible to the audience (the general public). The report is generally qualitative rather than quantitative and lacks numerical analysis and evidence to back up the statements made. For example, on p55 there is a statement that walking and cycling networks are considered to meet current demands, where the reference is to the "Dacorum Local Plan (2020-2038) Emerging Strategy for Growth Interim Sustainability Appraisal Report Appendices (November 2020)", which itself simply states this as a fact without providing evidence or quantifying the demand or provision. In particular and of more importance, the first bullet point on p80 states that "Without the emerging JSP, it is likely that the impacts of climate change will still be mitigated against". There is no evidence or reference whatsoever to back this statement up. If the JSP is written on the basis that sufficiently mitigating against climate change will just simply happen, then it is fundamentally flawed. This document and the JSP must quantify exactly how climate change will be mitigated against. The Appraisal Questions are all qualitative and give no numbers with which to judge how positive or negative one action will be. They need to have numbers associated with them so they can be challenged. Notes that all Growth Types are expected to have a negative impact on biodiversity, which surely means they must all therefore be rejected? Notes that Growth Types a, b, e and f are expected to have a strong positive effect on climate change. How can this be the case, where new houses are to be built, provisioned and heated? Is their construction expected to suck carbon	The statement on page 80 will be updated to state that there will be national and local targets set by the Government and local authorities via their Local Plans, regardless of whether a JSP is prepared. Many of the issues considered through the SA Scoping Report are almost impossible to quantify as such, it will be the role of the JSP itself as it progresses through the plan-making process to establish a series of quantifiable criteria that can be measured and reported on as part of the Authority Monitoring Reports to gauge how successful the performance of key policies are.

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	out of the air? This must be grossly inaccurate, and again there is a lack of evidence or numerical analysis to understand how this can possibly be accurate.	
This_frog	Any plans to build on the green belt should be scrapped indefinitely. The small towns of Hertsmere cannot/should not be used as a dumping ground for London's overflow.	Noted. This comment relates to the spatial approach to the planning of SW Herts, rather than commenting specifically on the SA Scoping Report.
Potters Bar Ian	Given the importance the government and local residents attach to protection of the Green Belt the Sustainability Appraisal Scoping report makes very limited reference to this important issue. Given recent government statements "Brownfield, Brownfield, Brownfield" and the Levelling up agenda, the report needs to be rewritten to reflect latest government thinking.	The content of SA Reports is currently set by the SEA Regulations, not by Government policy. It is important to note that Green Belt is not a landscape issue. Whilst Green Belt land may be valuable in these respects it is not a requirement or purpose of the designation to provide such qualities. Furthermore, Green Belt is a policy designation and not an environment or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues. However, matters often linked to people's understanding of Green Belt, such as protecting soils and ensuring efficient use of land, conserving biodiversity and geodiversity and enhancing SW Herts's landscape character and quality are clearly articulated within the proposed SA objectives, against which the

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		emerging strategy and policies within the plan will be assessed.
Ann Johnson	It places too much emphasis on 'Growth' with is undefined and fails to comment, mention and protect the areas of Green Belt within it. Protecting green space, agriculture and the environment should come first with 'growth' second and subject to the aforementioned.	Noted. The comment encompasses general observations relating to the Realising Our Potential document and the general approach that needs to be taken to the future planning of SW Herts, rather than commenting specifically on the SA Scoping Report. As explained above, the Green Belt is not an explicit consideration for the SA as it is not an environmental / landscape designation.
Caroline 66	Concerned about the volume of population growth and whilst thought has been given to transport, infrastructure and health etc, none of that is currently forthcoming. All the while our natural habit and environment continue to decline. It seems that this is only being considered as something that needs to be done, alongside population growth, rather than the number 1 priority. We have seen the increasing impacts of extreme weather, and that is not going to hold off getting worse whilst South West Herts works out how and when it will get the money to do something. The green belt must be protected at all costs, and enhanced as a priority, building should be upwards in a few specific high density locations, Watford, Hemel and St Albans with green corridors to the defined green spaces. One of the most important Infrastructure projects, has to be fibre broadband for all. This would enhance the lives of many at the lowest infrastructure costs. It will provide opportunities for improved stay at home health care, monitoring, communication, entertainment etc.	Noted. The comment encompasses general observations relating to the Realising Our Potential document and the general approach that needs to be taken to the future planning of SW Herts, rather than commenting specifically on the SA Scoping Report. As explained above, the Green Belt is not an explicit consideration for the SA as it is not an environmental / landscape designation.
BJH	Agrees with the vision outlined by the document and would support plans to implement it locally. There will be tough decisions to take, but the objectives are worthwhile.	Noted. The comment relates to the Realising Our Potential document rather than the SA Scoping Report.

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Cliff Hawkins	Reports contains a good deal of important data but is far too complex and filled with acronyms and jargon. This makes it difficult, if not impossible for members of the public to gain enough understanding to comment adequately. The recent abandonment of Local Plans due to public disquiet is evidence that many of the outcomes of the planning process are deeply unpopular. By directing unpopular policy from above, the JSP could be used to justify development of contentious sites at local level. If the objective is to co-ordinate the provision of affordable housing that is to be commended, but not if it is to drive unacceptable over-building on green belt sites against popular public opinion. In terms of housing numbers and future provision, there is no discussion of the inconsistency of the population projections in Table 3.4 with the housing projections in para 3.29. The population across the five authorities is projected to grow modestly between now and 2040, yet it is suggested that we need many times more homes than would be needed to accommodate that increase. No sustainability appraisal can be taken seriously unless it addresses this fundamental inconsistency in a satisfactory manner. There is very little discussion of the vital importance of green belt in this report. Building on green belt is always unsustainable, since green belt cannot be replicated without effectively moving it out to neighbouring authorities. Sustainable has become the 'catch all' term to justify almost any policy. There is no formal agreement on the meaning of the word sustainable so it can be interpreted to mean whatever the author wishes it to mean. The proposals regarding development around transport hubs are really directed at railway stations. The assumption that they are the ultimate in terms of sustainability ignores the fact that Hertfordshire railways really only serve north - south routes. The recognition of flood risk in para 3.13 is welcome. Little attention is however paid to the ground conditions in south and east Herts. The heavy clay layer in these areas means that SuDS cannot provide the answer to the development of flood risk sites. Why this report should seek to provide support for the development of flood risk sites when the NPPF 'sequential test' should rule them out is puzzling.	Noted. Many of the comments relate to concerns about the role and potential future content of the JSP itself – rather than being directly related to the SA Scoping report. It is not the role of the SA to assess any discrepancies between population growth projects and the housing figure generated by the Government's Standard method calculation. These discussions will happen between the district authorities and Government which is outside of the SA process. The report does not indicate support for building in flood zones. SA Objective 10 is to 'reduce the risk from all sources of flooding in SW Hertfordshire'; and one of the appraisal questions relates to minimising built development in areas prone to flooding. The reference to Watford in para 3.14 regarding flood risk will be clarified.

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	Also puzzling is the comment in para 3.14 regarding the highest flood risk area being Watford when the table beneath suggests Watford has the least number of properties with a 1 in 30 risk. Lack of reference to Potters Bar in the report – fear this indicates it will be forgotten.	
Rodney Tucker	His experience from working in the field of environmental scoping, impact and protection is that a key element of the final documents must include an environmental management plant that clearly defines responsibilities for ensuring that impacts are sustainably managed.	Noted.
Jamie Trybus	The Appraisal scores the 1st of the 6 pillars "Living green in a healthy natural environment" highly against: climate change, flooding, biodiversity and geodiversity. However there is a significant lack of focus on these elements within the SW Hertfordshire 2050: Realising Our Potential' document. Within the Sustainability Appraisal "therefore a significant positive effect is expected in relation to SA objective 13 (biodiversity and geodiversity).' Unsure as to how this will be realised with the heavy focus on growth within the SW Hertfordshire 2050: Realising Our Potential' document. A critique of the appraisal is the lack of score for SA15 - Landscape. Landscape should be a high scoring metric for the Sustainability Appraisal.	Noted. Further assessment of the JSP will be undertaken in the next iteration of the SA. As such, the current findings may change as the spatial strategy and related policies evolve.
Tim Morris	There are no keys to explain or define the graphics and colours used in the tables, so it is impossible to objectively assess and understand the SA findings in Chapter 6.	Table 5.1 in Chapter 5 – 'Use of the SA Framework' provides a key to the symbols and colour coding used in the SA assessment in the following section. Cross referencing will be added to Chapter 6.
Anne Samson	It all sounds good in principle. The test will be in actually making it happen – not because of legislation but because it is the right thing to do. Does not consider the report is good use of taxpayers' money. The simple strategy for ensuring all works in harmony is respect (love) for each other and our environment. This might sound naïve but by constantly working with this in mind, win win solutions	Noted. The preparation of an SA Scoping Report is a legal requirement when preparing a plan such as the JSP and its broad content and coverage are also legally prescribed.

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	can be found – there's currently too much about individual rights at all layers of interaction and not enough about living together in community.	
DEVELOPERS / LAND PROMOTERS / PLANNING CONSULTANTS		
Barton Willmore on behalf of Railway Pension Nominees Ltd	Generally accepting of the scoping work make following comments around the economic elements and growth options: – The paragraph numbering within the report appears to have been formatted incorrectly as it jumps from paragraph 3.44 back to paragraph 3.1 on page 43. – Welcome the recognition in the second bullet of paragraph 3.21 on page 50 that there is an under-supply in employment space across the JSP area. As outlined in our response to Topic Paper 4, this under-supply has stifled employment opportunities and businesses investment plans and it is critical that this historic under-supply is accounted for when projecting forward for land supply and growth. The outcome of this is reflected in points 3.23 and 3.24 where the lack of high-quality business space and supply are known to be at a critically low level. – Believe the JSP area is well located to absorb the loss of employment floorspace being experienced in London. This is most pressing for industrial/logistics uses, where the most sustainable locations in built-up areas are under pressure to deliver higher density housing and town centre uses. For instance, over the last 20 years, London has lost some 24% of its industrial land2. South West Hertfordshire as an adjacent neighbour, should be seeking to accommodate and attract these businesses moving out of the capital, rather than losing them to competing regions where it may be geographically far less sustainable to serve their natural markets. – Chapter 4 - consider that the text under: Sustainability 7 – 'Critically low amount of available employment space' should be expanded to addressing the chronic under-delivery and under-allocation of sites historically, and ensure future market trends and projected forward appropriately. – Chapter 5, SA Objective 6: 'To support the development of SW Hertfordshire's economy and achieve high and stable levels of	Noted. Further detail relating to the amount of available employment space and how to address this going forward are matters for an Economy Study to assess and advise on, rather than matters for the SA Scoping to assess further. The SA Scoping Report states that *"As the Issues and Options document explains, it is likely that a number of growth types would ultimately make up the spatial strategy for the plan."* The paragraph numbering will be amended.

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	employment' does not address the existing under-supply clearly. Believe that this should reflect back and ensure that the growth options considered, can also address the historic chronic shortfall. The Savills proposed methodology would be the most appropriate way of ensuring the land supply requirements are appropriately understood. – Chapter 6 contains 'pillars' which have been created to support the overall vision for the JSP area. Pillar 2 relates to 'growing opportunities to work locally', it is our view this should be widened to include meeting identified floorspace and employment requirements. Support the general premise of the pillar but it is not considered specific enough or measurable. – The growth option to be considered may require a mixed approach which involve new settlements, existing urban settlement growth and growth along key transport corridors. – The options put forward also fail to recognise that these options may not happen independent of one another. It is unlikely that there is a one size fits all approach to the whole JSP area, and one that meets all the demands of different uses (housing, employment, leisure, health, etc). The approach to growth needs to be flexible. For instance, it will be critical for I&L occupiers to be located on key transport routes with access to London.	
Lichfields on behalf of Commercial Estates Group	Whilst it is acknowledged that the Sustainability Appraisal (SA) can only provide a certain degree of detail at this early stage, the SA provides some initial findings on the 7 growth types that have been identified by SW Herts. It is evident that whilst all of the typologies can potentially provide for sufficient housing (save for perhaps any strategy that solely focusses on growth within existing built-up areas on brownfield sites only, which might see significant negative socio-economic and housing consequences), there are certain growth types that can deliver other particular benefits that will help SW Herts deliver their vision for sustainable growth. Table 6.2 of the SA confirms that Growth Type B (Growth of existing communities) would respond positively to the requirement to consider the need to mitigate against climate change, as well as provide benefits in respect of	Noted. The response does not relate to any issues or concerns with the SA Scoping Report as currently written. It is acknowledged that further assessment work will need to be carried out on individual sites as part of future work on the JSP to ensure that specific characteristics are taken into account.

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	economic growth. Further, pursuing this growth type would also enable SW Herts to positively respond to objective SA7, which is to reduce the need to travel by car and promote walking and cycling. Developing within or on sustainably located places on the edge of existing communities promotes the delivery of well-connected local areas with facilities such as schools and shops within walking distances, which provide the basis for concepts such as the 15 minute neighbourhood. However, whilst certain Growth types initially score higher within the SA, different sites within the same growth types will perform differently based on their own particular credentials against the SA criteria. This is particularly notable for criteria such as SA3 (Health), SA4 (inequalities) and SA5 (communities), which the SA currently considers these to be '+/- 'i.e., having the potential for both positive and negative effects. For these particular criteria, the score to which an individual development could be graded will vary significantly on the quality and design of a particular scheme.	
Lichfields on behalf of L&G	The Sustainability Appraisal supporting the JSP notes the effects of Growth Type B (Outward Growth) as having significant positive effects in relation to the following objectives: – SA Objective 6 (Economy): providing nearby access to local employment opportunities – SA Objective 7 (Travel): providing easily accessible and potentially 20-minute neighbourhoods – SA Objective 1 (Climate Change): reduction of travel distances – SA Objective 2 (Housing): Potential to deliver a significant number of new homes All of these positive effects support the pillars and objectives of the JSP. This is supported by national planning policy and in particular NPPF para. 73.	Noted.
Roebuck Land and Planning on behalf of Hallam Land Management	The SA must be supported by a full Green Belt review. As part of the strategic plan, it is necessary to establish whether the Green Belt as currently defined across the constituent authorities currently fulfils the fundamental aim and purposes of Green Belt policy within the NPPF. Particularly, a comprehensive assessment of the Green Belt around the main towns and centres of population to check whether the boundaries are properly defined and recognisable.	Noted. As stated above, Green Belt is a policy designation and not an environment or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues.

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	There are several edges, particularly in Dacorum (i.e. north Hemel Hempstead) where the boundaries have no degree of permanence and are not clearly defensible in the long term. The consequences of achieving sustainable development in the Southwest Herts area is acknowledged by the partner authorities as requiring Green Belt release through their early work on the emerging local plans. The JSP provides an opportunity to plan for safeguarded land to meet longer term needs stretching well beyond the plan period to guide future local plan reviews. Whilst it does not intend to identify specific sites or boundaries, it must be sufficiently targeted to provide clear direction to local authorities to avoid lengthy examinations for any subsequent 'part 2' local plan stages thereafter. Acknowledge that the next Regulation 18 consultation for the JSP will seek to identify a preferred option or options for growth. The scale of growth to be considered through the JSP is not yet determined, nonetheless the JSP should carefully consider the site size threshold for identifying broad locations for growth. If the JSP is to operate beyond the current Local Plans being prepared to 2038 and only deal with Strategic Development Locations for 3,000+ homes for the period 2038/2040 onwards, then it must establish clear parameters for plan-making. HLM would expect all sites/new communities of that scale (and any parts thereof) to be excluded from the current Local Plan processes (i.e. Hemel Garden Communities).	Similarly, the issue of defining appropriate thresholds for the size of sites considered by the JSP is not a matter for the SA Scoping Report. As the plan making process progresses, the SA will assess various iterations of the JSP.
Pegasus Group on behalf of L&Q Estates	This sets out relevant policy and strategy as well as contextual information. From this latter source, sustainability issues and likely evolution without the Plan are identified. These are considered to be very relevant issues to be addressed, however, addressing issues such as high house prices and affordability issues, ageing population and critically low amount of available employment space without the remit of being able to review and amend, where justified the Green Belt boundary. In terms of the Sustainability Framework, it is suggested that a further appraisal question is added. "Is the economic strategy, and related land supply, aligned with the housing strategy, and related land supply, to enable its successful implementation?"	Noted. The SA Report will be updated to further assess housing and employment issues when there is clarity over the precise levels of homes and jobs that the JSP could seek to deliver and what an appropriate balance should be.

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	In relation to the SA Findings for the Vision, Objectives and Growth Types, it is considered that throughout the benefit of providing housing to support the economy is not recognised. The scores should be updated to reflect this. In terms of the growth types, it is considered that a combination of the scenarios will be needed to accommodate the anticipated levels of growth and, therefore, considering each option is unrealistic, particularly when the development requirements have not been identified. All combinations and alternatives should be thoroughly examined so not to be vulnerable to challenge.	
Stantec on behalf of L&Q Estates	The results within table 6.2 show that outward growth of existing large settlements scores joint highest in terms of its response. The supporting text in chapter 6 of the report shows the benefits that result, such as benefits to the economy, and connectivity. A further advantage of outward growth relates to the provision of affordable housing. Redevelopment of previously developed land often brings with it large demolition and remediation costs. The potential impact is to affect the viability of bringing sites forward. More often than not, it is the affordable housing project which is used as a lever to reduce development costs, with a resulting reduction in provision. The risk of reduced affordable housing provision is much lower when considering outward growth, where development costs would generally be lower. The Report does criticise outward growth of settlements in terms of the loss of green space and associated losses in biodiversity. However, this does not need to be the case and should be assessed on a site by site basis. Our land interests provide the opportunity to ensure that the extension to the large settlement will be able to provide on-site biodiversity net gain accordingly.	Noted.
Turley on behalf of Crown Golf	It will be important for the SA to test a range of growth and spatial distribution scenarios. This will allow informed decisions to be taken to arrive at a preferred strategy in light of further public consultation. These options should extend beyond just minimum capped needs deduced by the current standard housing method (or other method to be confirmed through forthcoming planning reforms). This should consider the implications for meeting the actual assessed needs (i.e., uncapped), as well as the areas needs full need for affordable housing. It should also explore the extent to which adjustments are needed to support the	Noted. The SA must consider reasonable alternatives as a Plan evolves; therefore the next iterations of the SA report will consider this.

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	social and economic objectives of the plan, including the benefits of accommodating the economically active workforce needed to support these objectives, and in locations that foster more sustainable patterns of growth. Finally, we suggest further options are tested to assess the contribution the plan could make to addressing the unmet needs of adjoining LPAs, such as those already identified through the London Plan.	
Claremont Planning Consultancy on behalf of European Property Ventures	The SA Scoping Report provides a useful high level assessment of the emerging Plan against key sustainability objectives. However, as the plan progresses it is considered critical that the Sustainability Appraisal takes a more detailed review of these sustainability issues, ensuring that the decision making process is fully informed. The reporting must be clear to provide sufficient transparency around the decision making process. The extent of the Green Belt within the Plan area, and the level of housing need that the Plan must address, is such that it is considered likely that the JSP must consider the release of land from the Green Belt. As it is a joint strategic plan, it is acknowledged that this may result in identifying the direction for future growth and Green Belt releases, rather than the release of specific sites. However, if this is an issue that the JSP intends to address, then the Sustainability Appraisal must consider the implications of releasing land from the Green Belt.	Noted. Further assessment of the JSP will be provided within the next iteration of the SA report. As stated above, Green Belt is a policy designation and not an environment or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues.
Carter Jones on behalf of Beechwood Homes	We note with interest that paragraph 3.29 of the Sustainability Appraisal (SA) refers to the NPPF's Standard Method for assessing local housing need. It draws on 2014 - based household projections and increases the local housing need based on local affordability. It states that the average workplace-based mean affordability ratio in the Housing Market Area (HMA) is 13.9, when using the prescribed formula, the local affordability ratio results in an average uplift of 61%. This means the latest local housing need projection for the area, as set out in the Local Housing Needs Assessment, has increased from 2,888 dwellings to 4,043 dwellings per annum from the period 2020 to 2030. If 4,043 dwellings per annum are provided this would likely result in an additional 122,682 people in the area, over the period 2020-2036, likely to be divided as follows: – Dacorum: 31,724 – Hertsmere: 21,765 – St. Albans: 26,128	Noted. Currently, housing numbers do not form part of the detailed consideration of the Regulation 18 plan. The document's focus is on setting a vision and objectives for the plan.

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	– Three Rivers: 18,294	
Stantec on behalf of Urban & Civic	The Sustainability Appraisal Scoping Report (SA) considers the various options identified in terms of their impacts from a sustainability perspective. Paragraph 6.15 states that types c) new settlements, d) growth of groups of settlements, g) scattered growth, have the most potential for negative effects as they may result in more new growth across the more rural areas, where environmental assets are more likely to be adversely affected and where accessibility may be less good. This conclusion would clearly depend on the site in question and the approach taken to the landscape and other assets. This conclusion also fails to recognise that new settlements can bring forward high quality accessibility via sustainable modes. Paragraph 6.22 states that although new service centres would be created in new settlements, they are unlikely to be of a scale needed for the level of growth required in the area, meaning increase in vehicular movements. Again, this assumption fails to recognise the fact that new settlements are able to plan for new infrastructure and services at scale and in the case of the U&C master developer approach, alongside the delivery of new homes. Paragraph 6.25 states that new settlements could promote the cohesion of new communities through the provision of social infrastructure, providing neighbouring communities with additional services and facilities, creating minor positive effects in Health, Inequalities and Communities. It is stated that given the delivery period, these minor positives can also be negative during to the timing of infrastructure. The delivery of services alongside new homes is facilitated through the U&C Master Developer approach. This allows for the effective and phased delivery of infrastructure alongside new homes and, in many cases, ahead of time as evidenced through U&C's on-site delivery at sites such as Alconbury Weald, Waterbeach, Wintringham and Houlton. Paragraph 6.26 states that new settlements are likely to provide local job opportunities but still with questions of delivery, so mixed minor positive and negative effectives. It adds that the timing of infrastructure would increase the use of the private car which could be reduced through good design. This is not necessarily the case, and the delivery of new homes and employment can be	Noted. The assessment of the growth types is intentionally high level at this initial stage of the SA process. As the plan progresses, a more detailed assessment will be undertaken.

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	brought forward in tandem. Indeed, at U&C's site at Alconbury Weald in Huntingdonshire employment provision came forward ahead of homes. Paragraph 6.27 states that new settlements are more likely to be built on greenfield land resulting in less efficient use of land and greater potential for the loss of habitats, also potentially increasing the risk of flooding. Therefore, using the precautionary principle there could be uncertain significant negative effects in relation to flooding, soils, biodiversity, and landscape. Again, this entirely depends on the site in question and on the approach adopted. For example, the focus for U&C is to deliver at least 12% BNG (more than the national requirement of 10% set out in the Environment Act). Overall, U&C is concerned that the SA fails to recognise that if planned and delivered effectively, new settlements can deliver a critical mass of activity in a successful and phased manner with high quality design and is therefore unduly skewed towards spatial options that relate to existing urban areas as a result. As an example, urban extensions have the potential to place greater load on existing social infrastructure such as schools and may lack the critical mass to create additional infrastructure. The benefits of new settlements are that by planning holistically and at scale the infrastructure required to accommodate the residential development is provided largely onsite.	
Stantec on behalf of Crest Strategic Projects	The Sustainability Appraisal Scoping Report is supportive of our recommended hybrid growth type with Options A, B, E and F scoring 'highest' against the SA objectives. Most significantly, these options are the only to score positive (in each case being 'double positive') for climate change and travel (with the other options scoring negatively or neutral), supporting a number of the 6 Pillars.	Noted. The SA Scoping Report only seeks to provide a high level assessment of broad growth types at this early stage in the process. As the plan progresses, a more detailed assessment will be undertaken.
Pegasus Group on behalf of Bloor Homes and the Department of Health	Notes that Table 6.2 in the SA summarises the findings of the assessment of the growth types against the 15 SA Objectives and summarises these conclusions. The assessment states that C new settlements would most likely have negative because it may result in more growth across the rural areas. This is misleading as new settlements/garden villages can provide the opportunity for sustainable development. An objection is made to this sweeping assessment of new settlements, careful review of this growth scenario is required as it fails to look at the sustainable opportunities a new settlement/Garden village can deliver.	Noted.

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	At this stage as the level of growth is unknown the SA is an academic exercise. It is likely that the strategy will be a combination of the growth types with the exception of scattered growth.	
Turley on behalf of Tarmac	Paragraph 3.29 of the SA states that the average workplace-based mean affordability ratio in the Housing Market Area is now 13.9, when using the currently prescribed formula and that the local affordability ratio results in an average uplift of 61%. This means the latest local housing need projection for the area, as set out in the Local Housing Needs Assessment, has increased from 2,888 dwellings to 4,043 dwellings per annum from the period 2020 to 2030. Tarmac considers this situation to be untenable for such an important sub-region to the national economy and so requires a bold, creative and sustained planning response, taking into account the comments and suggestions made in the various criteria listed above. Offer to assist in this process and welcome further discussion with all of the relevant stakeholders in the Joint Strategic Plan making process.	Noted. Currently, housing numbers do not form part of the detailed consideration of the Regulation 18 plan. The document's focus is on setting a vision and objectives for the plan.
RPS on behalf of Richborough Estates	Regarding baseline information the response notes that the report highlights: – the housing affordability pressures facing households living in the area congestion being a major concern in SW Herts, and which is likely to continue to be an issue based on future trip forecasts. – the area around Croxley / West Watford is not impacted on by any Air Quality Management Areas (AQMAs). Considers there should be recognition given to potential initiatives coming forward to address congestion and promote modal shift, notably the Hertfordshire Essex Mass Rapid Transit proposals. This infrastructure scheme should be identified in the SA as this will be relevant to the appraisal of sites and broad locations in the Croxley/West Watford area of search. Regarding key sustainability issues they consider that many of the issues identified can all be tackled positively through appropriately planned, well-designed and well-located development delivered at a scale that address a wider range of issues on a comprehensive basis, which should include larger-scale development on the edge of existing, accessible settlements. Notes the use of a 'coding' approach in the SA Framework graded from - - to ++ based on negative and positive effects. Consider it is not clear on what basis a	Noted. The role of the baseline section of the SA Scoping Report is to set out the current situation within the SW Herts area under key headings. Its role is not to consider potential future projects that may change this baseline position. However, updates to baseline information will be included in the next iteration of SA where available and appropriate. The approach to colour-coding used in the SA Scoping Report is standard practice for SA Reports and together with the associated commentary is considered to provide sufficient information regarding why a particular effect has been

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	specific coding will be triggered and then applied to options against each SA objective, which will make it difficult to compare the scores for each option on a consistent basis. This runs the risk of a lack of clarity and transparency in the selection of preferred options (and rejection of reasonable alternatives) at a later stage. Consequently, a suitable system should be defined in the SA framework so the reader can understand why a particular effect has been assigned to each option to improve the robustness of the appraisal process. Notes that the report does not drawn any conclusions on the seven growth types tested at this stage. Nonetheless, it is noted that options b, e, and f all perform markedly better than options c, d and g. The higher performing options would direct growth to the edge of major settlements (option b), for example Watford, and locations well-related to existing public transport corridors (option e) and areas where transport improvements could potentially come forward (option f). On this basis, RPS concludes that the SA process thus far is broadly supportive of directing growth at or adjacent to existing large settlements as well as on or in proximity to sustainable transport corridors, in favour of other less performing options. RPS would broadly accord with these findings. It is important that the initial appraisal findings are reflected on as part of ongoing appraisal work, in particular consideration should be given to identifying potential mitigation measures that could address any potential adverse effects of the options, which has not been carried out to date, in line with planning practice guidance.	identified. SA reports are based on overall assessments of likely effects – rather than being an exact qualitative process. Future SA work will be carried out in full accordance with the relevant regulations and guidance. As the plan progresses, a more detailed assessment will be undertaken.
Carter Jonas on behalf of Apsley Developments Ltd	Note that the report refers to the NPPF's Standard Method for assessing local housing need and refers to some of the conclusion in the HMA regarding affordability ratios. Considers this means there is now an even greater scale housing supply that is now required across South West Hertfordshire. Notes that the SA suggests that without the emerging JSP it is likely that housing and services and facilities would still be delivered through each of the District and Borough Local Plans, but without a strategic approach it may be more difficult to keep pace with demand, and it is likely that house prices will continue to rise within the area. As highlighted in the South West Hertfordshire Local Housing Needs Assessment (LHNA), there are affordability pressures	Noted. Currently, housing numbers do not form part of the detailed consideration of the Regulation 18 plan. The document's focus is on setting a vision and objectives for the plan.

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	within the South West Hertfordshire Housing Market Area (HMA), and without a strategic approach it will be difficult for affordable housing delivery.	
Studio LK on behalf of Affinity Water (estates team)[1]	The baseline accompanying the report is quite thorough. It would be improved if, in addition to the Hertfordshire Water Study, it had regard to the relevant water companies' WRMPs too. LUC's assessment of the proportion of the JSP area covered by Green Belt is at odds with DLUHC data (66%). Affinity broadly agrees with the Sustainability Issues, but would like the term 'strategic' under Sustainability Issue 11 to be replaced with 'all'. SA objective 1 should be amended to specifically refer to water consumption. In addition SA objective 2 does not adequately address the affordability issues identified within the baseline. Therefore, it should be amended to: To provide a wide range of good quality new homes in sustainable locations to meet SW Hertfordshire's housing needs. Finally, the JSP authorities may wish to add a further objective: as follows: SA objective 16: To promote efficient use of natural resources including water	Noted. The baseline information will be updated to include reference to the relevant water companies' WRMPs. Additionally, Sustainability Issue 11 will be updated. SA objective 2 will be updated as suggested. It should be noted that water is addressed within SA objective 9: To maintain and enhance water quality and quantity, therefore an additional objective will not be added. However, an additional appraisal question will be included under that objective: 'promote the efficient use of water?'

Changes will also be required to the SA Scoping Report to reflect the revised assessment of the vision and objectives as a result of the changes recommended.

The following groups / individuals made reference to the SA Scoping in their responses, but did not make any comment on its actual content:

- Central Bedfordshire Council
- Open Spaces Society
- Woolf Bond Planning on behalf of Gilston Investments Ltd
- St Albans & District Footpaths Society

[1] It has been confirmed by Affinity Water that these comments are submitted by their estates arm and so should be treated separately for their formal response as a statutory consultee.