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Strategic Environmental Assessment (SEA) of the A414 Corridor Strategy

Adoption Statement

Hertfordshire County Council

October 2019

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Quality information

Prepared by	Checked by	Verified by	Approved by
Cheryl Beattie Senior Environmental Planner	Alastair Peattie Associate Director	Simon Willison Associate Director	Simon Willison Associate Director

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Prepared for:

Hertfordshire County Council

Prepared by:

AECOM Infrastructure & Environment UK Limited
3rd Floor, Portwall Place
Portwall Lane
Bristol BS1 6NA
United Kingdom

T: +44 117 901 7000
aecom.com

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1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) of Hertfordshire's emerging A414 Corridor Strategy (hereafter referred to as the Strategy).

SEA explained

- 1.2 SEA is a mechanism for considering and communicating the environmental impacts of an emerging plan or strategy and potential alternatives. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts as well as maximising opportunities for positive effects. Through this approach, the SEA seeks to maximise the environmental performance of the A414 Corridor Strategy.

This SEA Adoption Statement

- 1.3 The Draft A414 Corridor Strategy was consulted on with members of the public and stakeholders from December 2018 until February 2019. Following consultation, Hertfordshire County Council (HCC) reviewed the representations and made any necessary revisions to the Corridor Strategy. It is understood it is the County Council's intention to adopt the Corridor Strategy in Autumn 2019.
- 1.4 Regulation 16 of the SEA Regulations sets out the post-adoption procedures with respect to SEA, and requires that, as soon as reasonably practicable after the adoption of a plan for which an SA/ SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the SA Report and an 'SEA Adoption Statement', and inform the public and statutory consultation bodies of the availability of these documents. The consultation bodies are the Environment Agency, Historic England, and Natural England.
- 1.5 In the context of the requirements of the SEA Regulations, this SEA Adoption Statement for the A414 Corridor Strategy must explain:
- How environmental (and sustainability) considerations have been integrated into the Corridor Strategy;
 - How the Environmental Report has been taken into account during the preparation of the Corridor Strategy;
 - The reasons for choosing the Corridor Strategy as adopted, in the light of other reasonable alternatives dealt with;
 - How the opinions expressed by the public and consultation bodies during consultation on the Corridor Strategy and Environmental Report have been taken into account; and
 - The measures that are to be taken to monitor the significant effects identified for the Corridor Strategy.
- 1.6 In association with the above requirements, this SA Adoption Statement is structured as follows:
- **Chapter 2** addresses the first two bullets above, presenting how environmental (and sustainability) considerations have been integrated into the Corridor Strategy and how the Environmental Report has been taken into account.
 - **Chapter 3** sets out the reasons for choosing the preferred Corridor Strategy in light of other reasonable alternatives.

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- **Chapter 4** describes how consultation responses have been taken into account through the SEA process.
- **Chapter 5** presents the monitoring programme for the SEA.

2. How has the SEA process informed and influenced the development of the Corridor Strategy?

Introduction

- 2.1 SEA work began in 2018, and the process has informed and influenced the Corridor Strategy throughout its development. The SEA primarily influenced the Corridor Strategy in the refinement of interventions, development and appraisal of reasonable alternatives and appraisal of the emerging Draft Corridor Strategy and its proposed interventions.
- 2.2 This Chapter explains how environmental and sustainability considerations have been integrated into the (final) Corridor Strategy and how the Environmental Report has been taken into account. It is structured as follows:
- Scoping;
 - Assessment of Alternatives;
 - Assessment of the Draft Corridor Strategy; and
 - Final Corridor Strategy.

Scoping

- 2.3 As the first stage of the SEA process, the scoping process sought to identify the key environmental and sustainability issues and objectives that should be a focus of (and provide a broad methodological framework for) the SEA.
- 2.4 The SEA Framework was agreed with HCC and in line with the SEA Regulations consulted upon with statutory consultees for a period of five weeks between August and September 2018. The SEA objectives have structured the assessment process and the way in which the environmental effects of the Strategy were described, analysed and compared. Using this framework has ensured that options/ proposals were assessed in a consistent and comparable way.
- 2.5 The SEA framework, as broadly agreed in 2018, is presented in **Table 2.1** below.

Table 2.1: The SEA framework

SEA theme	SEA objective	Assessment questions; will the option / proposal help to:
Air quality	Improve air quality within the A414 Corridor Study Area.	<ul style="list-style-type: none"> • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Improve air quality within Air Quality Management Areas (AQMAs)? • Promote the use of low emission vehicles? • Promote enhancements to green infrastructure networks to facilitate increased absorption and dissipation of nitrogen dioxide and other pollutants?
Biodiversity	Protect and enhance all biodiversity and geological features.	<ul style="list-style-type: none"> • Avoid, or if not minimise impacts of new transport infrastructure on biodiversity, including designated sites, and provide net gains where possible? • Protect and enhance ecological networks, including multifunctional green infrastructure? • Support access to, interpretation and understanding of biodiversity and geodiversity?
	Support climate change	<ul style="list-style-type: none"> • Reduce pressure on the highway network?

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Climate change	mitigation in the Study Area through limiting the contribution of transport to greenhouse gas emissions.	<ul style="list-style-type: none"> Promote the use of sustainable modes of transport, including walking, cycling and public transport? Promote the use of alternative fuel and/or electric vehicles?
	Support the resilience of the Study Area to the potential effects of climate change, including flooding.	<ul style="list-style-type: none"> Ensure that inappropriate development does not takes place in areas at higher risk of flooding, taking into account the likely future effects of climate change? Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change? Sustainably manage water run-off, reducing surface water runoff (either within the Study Area or downstream)? Ensure the potential risks associated with climate change are considered through new development in the Study Area? Increase the resilience of biodiversity to the effects of climate change, including through enhancements to ecological networks?
Landscape and historic environment	Protect and enhance the significance of the historic environment, including historic landscapes and townscapes and heritage assets and their settings.	<ul style="list-style-type: none"> Conserve and where possible, enhance buildings and structures of architectural or historic interest? Conserve, and where possible, enhance conservation areas? Conserve, and where possible, enhance local diversity and distinctiveness? Support the integrity of the historic setting of key buildings of cultural heritage interest? Support access to, interpretation and understanding of the historic environment?
	Protect and enhance the character and quality of the Study Area's landscapes and townscapes.	<ul style="list-style-type: none"> Support the management objectives of the Chilterns AONB? Conserve and enhance landscape and townscape features?
Land, soil and water resources	Promote the efficient and the efficient and effective use of natural resources.	<ul style="list-style-type: none"> Assist in facilitating the use of previously developed land? Avoid the development of the best and most versatile agricultural land? Encourage recycling of materials and minimise consumption of resources during construction, operation and maintenance of new transport infrastructure? Support improvements to water quality? Support enhancements to the status and/or potential of waterbodies under WFD objectives? Protect groundwater resources?
Population and community	Improve the health and wellbeing of residents within the Study Area.	<ul style="list-style-type: none"> Avoid and minimise impacts on human health and wellbeing including increased disturbance (noise and light pollution)? Enhance the provision of, and access to, green infrastructure in the County, in accordance with national standards?
	Enhance road safety in the Study Area?	<ul style="list-style-type: none"> Improve road safety and reduce road accidents?
	Promote sustainable transport use and reduce the need to travel.	<ul style="list-style-type: none"> Encourage modal shift to more sustainable forms of travel? Reduce the need to travel?
	Delivery of a transport infrastructure to meet the foreseeable needs of the varied communities within the Study Area.	<ul style="list-style-type: none"> Maintain and enhance accessibility for all people within the Study Area? Maintain or enhance the quality of life of residents?
	Support economic development in the Study Area.	<ul style="list-style-type: none"> Support economic development and areas of high growth pressure? Improve accessibility to employment opportunities?

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Assessment of Alternatives

- 2.6 Following on from scoping, the framework was used to assess options under consideration in the development of the Corridor Strategy.

Interventions

- 2.7 As an initial stage, the SEA framework was utilised to identify a set of broad quantitative measures that could be used in a high-level GIS-based analysis of the long list of interventions under consideration in initial development phases of the Corridor Strategy. This analysis was not intended at this stage to indicate a 'significant effect' but rather assist in the differentiation of interventions by categorising their performance and highlighting instances of interventions performing relatively well/ poorly against criteria linked to the SEA framework. The results of this analysis were fed back to HCC and assisted in the short-listing of options/ interventions, integrating with the staged approach taken in developing the Corridor Strategy.
- 2.8 The detailed methodology and findings of this work was presented in Appendix III of the SEA Environmental Report (November 2018) and the results further informed the establishment and assessment of the reasonable alternatives, as well as the appraisal of the Draft Corridor Strategy as a whole.

Segments and the Corridor Strategy as a whole

- 2.9 The SEA sought to support decision-making by exploring each segment of the study area to determine if there were any realistic choices to be had in terms of alternative packages of interventions within that area.
- 2.10 Some of the interventions were taken forward from existing adopted transport strategies within the scope of the A414 corridor, which had already been through a process of sifting and analysis, and some interventions were also part of developer-led schemes, often linked to other connected housing and employment land development. Despite this, reasonable alternatives were identified for Segments 1, 6, and 11.
- 2.11 Following the consideration of individual segments, it was also considered appropriate to determine if there were any corridor wide alternatives that could meet objectives. The concept of a Mass Rapid Transit (MRT) was put forward as a potentially viable alternative to the car for inter-urban journeys, and the SEA sought to explore reasonable alternatives to this strategic intervention. No feasible reasonable alternatives to the MRT could be identified and whilst options may exist around the potential MRT scheme including its route, this would need to be explored in further detail with identifiable schemes.
- 2.12 On this basis, the options identified for Segments 1, 6, and 11 were assessed using the SEA framework and the findings of this assessment were fed back to HCC to aid decision-making in relation to the preferred options for the Draft Corridor Strategy. This approach also ensured that clear reasons were identified by HCC for progressing the preferred option and rejecting alternative options.

Assessment of the Draft Corridor Strategy

- 2.13 The emerging Draft Corridor Strategy was assessed through the SEA process in autumn 2018. and the findings fed back to HCC before being published for consultation in December 2018. The assessment (presented in Chapter 9 of the Environmental Report Dec 2018) identified and evaluated the 'likely significant effects' of the Draft Corridor Strategy on the baseline, drawing on the sustainability themes and objectives that were identified through scoping (see **Table 2.1**) as a methodological framework.
- 2.14 The assessment was structured according to the six SEA themes identified at the scoping stage. Stand-alone consideration was given to distinct segment specific elements of the Strategy, before the assessment of the Draft Corridor Strategy as a whole. Where necessary, proposed mitigation was set out and recommendations made to try and enhance positive

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effects. The assessment also took into consideration the potential for cumulative effects to arise through interactions with other plans, programmes and projects.

- 2.15 The findings of the assessment were shared with HCC prior to the publication of the Draft Corridor Strategy and the accompanying Environmental Report in December 2018. The consultation responses received and how they have been taken into account through the SEA process are presented in Chapter 5 of this SEA Adoptions Statement.
- 2.16 In response to the representations received amendments were made to the Corridor Strategy. These changes were reviewed to determine if any further SEA work was required. No new realistic options/ reasonable alternatives were identified and therefore the outline reasons for the selection of the preferred strategy presented in Chapter 7 of the Environmental Report (November 2018) are still valid. The outline reasons are re-iterated in Chapter 4 of this SEA Adoption Statement. It is also important to note that the changes to the Corridor Strategy do not significantly affect the findings of the Draft Corridor Strategy presented in Chapter 9 of the Environmental Report (November 2018).

Final Corridor Strategy

- 2.17 Following publication of the Draft Corridor Strategy and Environmental Report in December 2018, amendments were made to the Corridor Strategy in response to the consultation comments received. The changes made to the Corridor Strategy were reviewed along with any responses directly referring to the Environmental Report, to determine if any further SEA work was necessary.
- 2.18 No new alternatives were identified, and, on this basis, no further alternatives assessment work was considered necessary. The outline reasons for selecting the preferred strategy in light of alternatives has been updated to reflect the changes to the Final Corridor Strategy, in particular that no preferred strategic intervention has been selected for Segment 11 (Hertford). The outline reasons are presented in Chapter 3 of this Adoption Statement.
- 2.19 It was determined that the changes to the Corridor Strategy do not significantly affect the findings of the SEA presented in the Environmental Report that was published alongside the Draft A414 Corridor Strategy in August 2018. In summary the main changes to the Corridor Strategy relate to:
- Less emphasis and determination of the MRT service type, service frequency, phasing, routing, service configuration, interchange types, branding, potential road design, package components and estimated costs. These changes reflect the further work being undertaken to determine a preferred mode and route (separate to the Corridor Strategy).
 - Less emphasis placed on the Hertford bypass option, although reference to a bypass remains in the context of a 'Strategic Intervention' (as referenced in the East Hertfordshire District Plan).
 - Updated references to link the Strategy to Greenspace Action Plans.
 - Minor changes to the text and figures/ tables were also made reflecting updated evidence or identified errors.
- 2.20 On this basis, the overall conclusions for each SEA topic presented in Chapter 9 of the Environmental Report are still valid and this was fed back to HCC to assist in the finalisation of the Corridor Strategy.

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3. Why was the adopted Corridor Strategy chosen in light of reasonable alternatives?

Introduction

- 3.1 The outline reasons for the selecting the preferred approach in light of reasonable alternatives was presented in Chapter 7 of the Environmental Report (2018). The outline reasons for selecting the preferred approach in light of alternatives has been revised and presented below to reflect the changes to the Final Corridor Strategy.

Reasonable alternatives for Segments

Segment 1 - Hemel Hempstead

- 3.2 The M1 motorway is a major transport route running north-south through Hertfordshire. Junction 8 is a major gateway to Hemel Hempstead including the expanding Hertfordshire IQ Enterprise Zone. Junction 8 also acts as a link between the M1 and the A414. The junction currently experiences severe traffic congestion. A developer-led proposal to improve M1 Junction 8 has been identified. It is expected to be promoted as part of the emerging East Hemel Hempstead urban extension development. Dacorum Borough Council is developing proposals for a Garden Communities masterplan for the town which encompasses more development to the east and potentially the north of Hemel Hempstead. Transport modelling work undertaken for Hertfordshire County Council and by private developer consultants has suggested that improvements to M1 Junction 8 may not be sufficient to help mitigate the traffic effects of wider growth.
- 3.3 In fact, the improvements to M1 Junction 8 are not envisaged to fully resolve traffic congestion in this area, and hence the intervention has been included in a package which also incorporates other non-highway interventions which aim to encourage modal shift. The proposed Mass Rapid Transit could also route through M1 Junction 8 with a transport hub located nearby. Therefore, the alternative option for a M1 Junction '8a' could in fact be in addition and come forward at a later point in time. In terms of timescales; however, improvements at M1 Junction 8 are considered to be a higher priority and the potential for an additional junction on the M1 will be evaluated again in the context of emerging Garden Communities masterplan work at a later point in time.

Segment 6 - St Albans, Park Street and London Colney

- 3.4 Similar to the example in Segment 1, an improvement to the A414/A1081 London Colney roundabout would more directly address traffic congestion at what is a major junction along the corridor. It facilitates movements east-west along the A414 as well as north-south between St Albans and the M25, as well as provide access to the small town of London Colney.
- 3.5 It has been determined that providing improved walking, cycling and bus links (primarily between London Colney and St Albans) alone will not sufficiently address highway capacity issues at the junction, and therefore the option of an improved junction is considered to be a priority but in conjunction, or in turn helping to facilitate better alternatives. It is also considered that a potential Mass Rapid Transit could have some influence on travel patterns and connectivity to/from London Colney (depending of course on the eventual route of the MRT); however, considering this could be a longer term opportunity, a junction improvement which is largely within the existing highway boundary has been determined as an appropriate option to take forward.

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Segment 11 - Hertford

- 3.6 A bypass to the south of Hertford had emerged as the preferred option over a northern corridor in the draft corridor strategy. This had been determined based on a combination of cost, engineering feasibility, transport impact and environmental factors. In the final corridor strategy, there is less emphasis placed on the bypass, and no determination of whether a northern or southern alignment is preferred. If a bypass is subsequently identified as a preferred way forward, the bypass alignment options will be subject to more detailed assessment/examination subsequent to the Corridor Strategy.
- 3.7 Taken the above into account, it is no longer necessary to provide outline reasons for selection in the context of the SEA Regulations.

Reasonable alternatives for the Strategy area

- 3.8 In line with the objectives and policies of HCC's Local Transport Plan 4 and the adopted and emerging Local Plans in the area, the draft corridor strategy has determined that it would not be appropriate or sustainable to continue catering for car trips by providing additional highway improvements over and above the proposed interventions.
- 3.9 One of the underlying reasons for the corridor's traffic congestion issues is a lack of attractive and viable alternatives which forces people to use a car. The concept of a Mass Rapid Transit (MRT) has been put forward as a viable alternative to the car for inter-urban journeys.
- 3.10 It is considered that to deliver a MRT in a shorter timeframe and in a form which is affordable and does not require very significant and disruptive infrastructure works; however, more detailed feasibility studies and a business case of viable options will be required following this strategy, which will then be subject to SEA.
- 3.11 A public transport alternative to a MRT which has been dismissed on the basis of likely cost and value-for-money is a heavy-rail based system. The east-west rail corridor would need to link together the various north-south radial rail corridors feeding into London from the West Coast Main Line in the west and the West Anglia Main Line in the east. There have in the past been various railway branch lines that criss-crossed parts of the corridor; however, many of these closed between the 1950s and 1970s, including routes between Hemel Hempstead and Harpenden, St Albans and Hatfield, Welwyn Garden City and Hertford, and between Hertford North and Hertford East stations. Parts of these former rail lines have since been built on or they now function as attractive leisure routes including parts of the National Cycle Route Network. These railways mostly operated separately so it would not have been possible for a passenger to have made a journey by rail from for instance between Hemel Hempstead and Hertford without making at least one change. Furthermore, many of these former railways comprise of a single track. It is considered that to provide a fast, inter-urban heavy-rail based service; two tracks would be required at least on parts of the route to enable two trains to pass. Any re-opening of these former rail corridors would most likely require significant engineering and land purchase. Sections of the north-south main line railways would need some form of upgrade as would stations to accommodate additional tracks and/or platforms. The existing cycleways would need to be diverted onto new routes elsewhere or space provided alongside the tracks to accommodate the cycleways.
- 3.12 A further alternative would be to develop an entirely new rail alignment; however, this would be extremely costly and unlikely to reach the centres of urban settlements without very significant land purchase, demolition of existing buildings and the construction of bridges and tunnels.
- 3.13 As such, it is deemed at this stage that there are no reasonable alternative options to the MRT, and that whilst options may exist around the potential MRT scheme including its route or the strategic interventions it could facilitate, this would need to be explored in further detail with identifiable schemes that can be subject to SEA.

4. How have the opinions expressed by the public and consultation bodies been taken into account?

Introduction

4.1 This section identifies the opinions expressed by consultation bodies and the public and how these opinions have been taken into account in the SEA process and development of the Corridor Strategy. It is structured according to the two rounds of consultation undertaken to date, firstly identifying statutory consultee responses to scoping, and secondly wider responses to the Environmental Report published alongside the Draft Corridor Strategy in December 2018.

Scoping Report (August 2018)

4.2 Scoping consultation was the first round of consultation in relation to the SEA. The SEA Regulations require that “when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.¹ As such, the Scoping Report was released to these authorities for consultation for a period of five weeks between August and September 2018.

4.3 One response was received from Historic England and **Table 5.1** below documents this. No response was received from Natural England or the Environment Agency.

Table 4.1: SEA Scoping Report consultation responses, 2018

Consultation response	How the response was considered and addressed
Historic England	
Edward James, Historic Places Advisor, East of England	
<p>Thank you for your email requesting a scoping opinion for the A414 Corridor Strategy Strategic Environmental Assessment. As the Government’s adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local and neighbourhood planning process. Therefore we welcome this opportunity to review the Scoping Report for the A414 Corridor Strategic Environmental Assessment.</p> <p>As you will be aware, under the provisions of Article 5(1) of The SEA Directive there is a requirement to assess the likely significant effects which the Policies and proposals of a Plan might have upon “cultural heritage including architectural and archaeological heritage”. We are pleased to note that considerations of the historic environment are included, but we have the following comments on the content of the scoping rep</p>	Noted, with thanks
<p>Strategy Objectives -</p> <p>Objective 5 should aim to enhance the quality and vitality of historic landscapes in addition to historic townscapes.</p>	Noted, with thanks. It is considered that reference to the ‘Study Area’ is all encompassing of both

¹ In line with Article 6(3) of the SEA Directive, these consultation bodies were selected “by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes”.

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Consultation response

How the response was considered and addressed

We recognise that these objectives have been taken from the HCC Local Transport Plan, but the study area for the Strategy covers parts of both Hertfordshire and Essex. Objective 6 only aims at preserving the quality of Hertfordshire's environment. We would suggest that Essex is included. We would also recommend that the objective is reworded to *"Preserve the character and quality of Essex and Hertfordshire's natural, built and historic environments"*.

Hertfordshire and Essex and by a combined theme of landscape and historic environment, both historic landscapes and historic townscapes remain in the scope of the assessment.

Section 5 -

5.19 We are pleased to note that the SEA Scoping Report makes reference to the rich historic environment within the study area. Although it is useful to note the numbers of different heritage assets, we would recommend that each of the strategy's corridor segments is illustrated with a map that identifies the heritage assets within that area, to provide clarity. The section should also set out the sources of evidence for the evidence base provided, and also should make clear that great weight is given by national planning policy to the conservation of heritage assets.

Noted, with thanks, whilst individual segment maps have not been produced, the assessment will include GIS analysis of all interventions to identify precise proximity of designated heritage assets. All evidence and sourcing underpinning the assessment are provided.

5.20 - Historic England are also statutory consultees on applications for planning permission in certain cases. This should be clarified.

Noted with thanks, information updated in Appendix II of the Environmental Report.

5.25 - The Heritage at Risk Register does not include grade II listed buildings outside of London, with the exceptions of places of worship. We welcome the identification of the number of heritage assets at risk, but caution that the numbers identified are incorrect. For example, there are 58 heritage assets on the At Risk Register in Essex, not four, and eleven in Epping Forest alone.

Noted, with thanks, information updated in Appendix II of the Environmental Report.

5.26 - We welcome the inclusion of non-designated heritage assets in the scope of the assessment, but recommend that 'undesigned' is changed to 'non-designated' where it is used, to ensure the Scoping Report uses correct terminology.

Noted, with thanks, and reflected in the Environmental Report.

We would refer you to the guidance in Historic England Advice Note 8: *Sustainability Appraisal and Strategic Environmental Assessment*, which can be found here: <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

Noted, with thanks.

This advice sets out in detail the historic environment factors which need to be considered during the Strategic Environmental Assessment or Sustainability Appraisal process, and our recommendations for information you will need to include.

Historic England strongly advises that the conservation team of the relevant local planning authorities and the archaeological advisors at Hertfordshire and Essex County Councils are closely involved throughout the preparation of the SEA of this Strategy. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER; how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of historic assets.

Noted, with thanks.

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Consultation response

How the response was considered and addressed

This opinion is based on the information provided by you in the document dated 13 August 2018 and, for the avoidance of doubt, does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SEA, have adverse effects on the environment.

Environmental Report (November 2018)

- 4.4 Following on from scoping, the SEA Regulations require that an Environmental Report is published for consultation alongside the draft A414 Corridor Strategy that '*identifies, describes and evaluates*' the likely significant effects of implementing '*the plan, and reasonable alternatives*'. The report must then be taken into account, alongside consultation responses, when finalising the Strategy. The Draft A414 Corridor Strategy and accompanying SEA Environmental Report was consulted on with members of the public and stakeholders from December 2018 until February 2019.
- 4.5 117 responses were received and reviewed in relation to the SEA. The responses deemed relevant to the SEA Environmental Report findings and assessment at this stage are documented in **Table 5.2** below.

Table 4.2: SEA Environmental Report consultation responses, 2019

Consultation response

How the response was considered and addressed

Response ID: S004

The proposals fail modern environmental standards: All the proposals in the strategy – whether for MRT or for road junction improvements - depend on carbon-fuelled transport (whether buses or other road users). The Government proposes to ban the use of petrol & diesel fuel by 2040 and there is not yet a sustainable non-carbon alternative fuel for buses. The strategy needs to be revised to include Government and legislative requirements.

Noted, the SEA considered all reasonable alternatives and the Environmental Report meets the legislative requirements in relation to assessing the Strategy for its 'likely significant effects' on the environment.

Response ID: S029

There are significant concerns regarding the robustness and adequacy of the judgments presented within the SEA Report which considers environmental factors. As such, the northern bypass should therefore be considered the preferred option for the following reasons:

- Biodiversity: both options have the potential to result in effects on ecological assets, however, the northern bypass option would result in reduced impacts on important ecologically designated sites (e.g. European sites or SSSIs) than the southern bypass option;
- Landscape and Historic Environment: The SEA seriously

Noted. The SEA has informed and influenced plan-making; however, it is one consideration that builds part of the evidence base underpinning the strategy, and the preferred approach is considered in light of the full range of evidence developed alongside the Corridor Strategy.

The assessment needs to be proportionate and is based

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Consultation response

How the response was considered and addressed

undervalues the value of designated heritage assets and the landscape to the south of Hertford and avoids assessing the harm to significance likely to be done by the imposition of new road infrastructure in a historic landscape setting. It also erroneously places emphasis on the balancing effect of providing greater public access to registered parkland, when in reality a by-pass is likely to reduce public access by impacting on the activities of the University of Hertfordshire's campus and the Bayfordbury Observatory. In addition, the SEA's position that building fast road infrastructure close to registered parkland will improve public awareness of it, is not credible.

on available evidence and professional judgement to predict the nature and significance of effects.

- Land, Soil and Water Resources: over 50% of the southern bypass option is likely to intersect with the drinking water safeguard zone (Groundwater), which is more than for the northern bypass option, therefore the northern option would have a lesser impact than the southern option; and
- Population and Community: there is significant housing growth in Hertford identified within the East Herts Local Plan with the majority of this is located to the north of Hertford and in Ware. As such, a transport corridor connecting these planned development sites (i.e. the northern bypass option) would be considered preferable to a bypass which did not provide this function. Furthermore, the southern option would adversely impact on the operation of the University of Hertfordshire's Bayfordbury Observatory which participates in internationally important research and is a significant contributor to the local economy through provision of full-time employment and work experience opportunities, as well as supporting community activities. The existing use of the Observatory associated with the University of Hertfordshire is only possible due to the lack of light pollution in the area, and consequently construction and operation of a new bypass in proximity to this could have a detrimental impact on the operations of the University and contrary to what the SEA indicates, it could adversely impact access opportunities that the University campus currently provides.

The Planning Practice Guidance confirms that "substantial harm" may be caused to a heritage asset by "development within its setting". In parallel, the NPPF states that "substantial harm" to grade II registered parks or gardens, should be exceptional, while "substantial harm" to assets of the highest significance, including grade II* listed buildings, should be wholly exceptional. The current consultation has failed to demonstrate that wholly exceptional circumstances exist to justify the substantial harm to the heritage assets, indeed this issue appears to have been largely disregarded.

The proposed Bypass routes (either north and south) would impact on the Green Belt. Whilst the NPPF Paragraph 146 indicates that local transport infrastructure is not inappropriate in the Green Belt, this is provided they preserve its openness and do not conflict with the purposes of including land within it and is dependent on demonstrating a requirement for a Green Belt location. There is no assessment of impact on openness or consideration against the five

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Consultation response

How the response was considered and addressed

purposes of the Green Belt provided, nor is there any evidence to support a requirement for a Green Belt location.

Response ID: 101233853

Ancient Woodland should be preserved as much as possible, but, a managed clearance and replanting scheme could bring some overall improvements.

Noted.

Response ID: 103149111

Major transport infrastructure development on this scale has the capacity to be extremely damaging to the biodiversity of an area if poorly planned. HMWT broadly welcomes the principles expressed in the SEA framework regarding how the scheme will address biodiversity. However, we believe these could be more clearly and robustly stated in order to better reflect recent changes in the wording of NPPF, the new East Herts Local Plan and the emerging Broxbourne Local Plan. These documents require that impacts on all biodiversity are measured in an objective way – not just impacts on priority habitats or designated sites. If this project is to achieve meaningful net gain to biodiversity it must specify the mechanism by which net gain will be measured. If it does not, any claims of net gain will be subjective, dubious and therefore open to dispute. HMWT therefore strongly recommends that the DEFRA biodiversity impact assessment metric should be definitively stated as the mechanism for measuring the impacts on habitats. Only a net positive ecological unit assessment score should be considered acceptable and compliant with national and local planning policy. The SEA framework themes as in table 3.2 should be altered to reflect this, as expressed below:

Noted.

The assessment is strategic in nature and needs to be proportionate. It is based on available evidence and professional judgement to predict the nature and significance of effects.

Please see Para 9.19 of the Environmental Report in which the potential positive effects arising from embedding a core principle to achieve biodiversity net gain are recognised.

‘Conserve and enhance biodiversity and all geological features.

Avoid, mitigate or as a last resort compensate impacts of new transport infrastructure on biodiversity, including designated sites, resulting in a measurable net gain to biodiversity as determined by the DEFRA biodiversity impact assessment metric?

Protect and enhance ecological networks, including multifunctional green infrastructure?

Support access to, interpretation and understanding of biodiversity and geodiversity?’

Response ID: 103709105

The SEA makes no mention of the fact that the A414 lies within the River Lee flood zone 1 in Hertford and at Mill Green. Both of these locations are a highway risk under climate change (increased flood risk). The Hertford by-pass would alleviate the flood risk to the strategic route but the Mill Green risk would remain.

Please see Para’s 9.21 to 9.29 of the Environmental Report. The SEA has assessed and identified potential negative effects arising in terms of fluvial flood risk and surface water flood risk. It is however considered that these effects are unlikely to be significant when project level mitigation has been considered.

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Consultation response

**How the response was
considered and addressed**

	Mitigation is also proposed to minimise surface water flood risk.
Response ID: 105426542	
Just to say that in addition to what I have already said, that whatever happens. the environmental impact on wildlife as well as humans should always be taken into account and environmental impact and damage should be kept to a minimum.	Noted.
Response ID: 106023854	
Should be in line with SADCs agreed Local Plan, or could cause problems?	The SEA has explored, through the context review, other plans and programmes that should be considered for their potential to affect or be affected by the A414 Corridor Strategy. Table 2.1 in the Environmental Report outlines the Local Plans that are relevant to the Study Area and includes SADC Local Plan.
Response ID: 108364420	
Why has this plan not been publicised? i feel that things are purposely done 'under the radar' so we do not have the opportunity to comment on what a life-changing impact this will have on our lives and contradicts the precise reason i moved here in the first place.	The Environmental Report was publicised for consultation between December 2018 and February 2019.
Response ID: 108848819	
Extend the consultation and have further meetings with interested parties such as Parish councils, civic society and residents. More detail needs to be published about the bypass.	Noted.
Response ID: 108834277	
Sad that no mention is made of all the habitats that will be destroyed in building the bypass and the effect of noise and air pollution on the rural environment	Please see Para's 9.10 to 9.20 of the SEA Environmental Report which identifies the potential negative effects arising for biodiversity in the Plan area.
Response ID: 108864116	
Re the EIA - there appears to be no mention of the continuing gender disparity between car drivers (men) and bus users (women) . Its the most obvious point to assess and I can't see it.	Noted. This was not identified as a key issue in the Scoping Report.

DRAFT

Consultation response

How the response was considered and addressed

Response ID: 106477028

Previously commented on need for train line and better bike lanes to improve travelling, whilst hitting the need for environmentally friendly travelling.

Noted.

Response ID: 105126039

I believe this Bypass will have a big impact on residential homes in Hertford Heath, balls park and the surrounding homes around Foxhills area as well as feeding more pollution into the local farms where they grow food and raise cattle. It will make a massive impact on noise, light and pollution in these urban areas. Balls park has hundreds of homes and a tranquil environment people have paid a premium to be in which will effect future prices of the homes in the area.

This will spoil what natural beauty and tranquillity is in the area. there are many different wildlife and Families with children within the park and surrounding areas that will be effected by this.

This will also run very close to a camping site which is an established business and effect homes along Mangrove Road. and further into Hertford Heath. Birchall lane to Hoddesdon would lessen the impact on residential homes. or a tunnel system bypassing the town would be less destructive on residents of Hertford and homes effected by this proposal. My family live in this area and to see these family homes spoilt by this proposal is awful.

The Environmental Report has sought to assess and identify the potential or 'likely significant effects' in implementing the A414 Corridor Strategy, and this assessment has highlighted the potential for the negative effects outlined in the response. For examples, please refer to Para's 9.10 to 9.20, and 9.35.

Response ID: 105200607

Could we have a more concise report to consider please?

Noted. The Environmental Report published for consultation between December 2018 and February 2019 included publication of a shorter 'Non-Technical Summary' as a concise summary of the main report.

Response ID: 105232875

The Southern Bypass will cause noise and pollution and destruction of valuable countryside.

The Environmental Report has identified the potential for these negative effects in implementation of the A414 Corridor Strategy. For examples, please refer to Para's 9.35, 9.39 and 9.43 of the SEA Environmental Report (November 2018).

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Consultation response

**How the response was
considered and addressed**

Response ID: 105239175

How can I refer to section 24 when I can not find it in the summary document, I should not have to refer to a 96 page document to unpick what is going on. I find it very disingenuous that you have a massively patronising "easy to read" version that insults the intelligence but then the next level required to answer the different segments is a 96 page document. How about 10 pages without pictures and a descriptions of what a subway and the environment are, just the facts.

Noted.

Response ID: 105554106

I would be very concerned about the adverse effect of a new road on wildlife in this area.

Please refer to Para's 9.10 to 9.20 of the Environmental Report which have sought to assess the 'likely significant effects' in relation to biodiversity.

Response ID: 106083272

We should consider and evaluate future radio signal pollution as well as noise, light, gas, particulate, solvent pollution levels. Vehicles increasingly use radio wifi, Bluetooth, cellular (2G, 3G, 4G and upcoming 5G) systems. So roads will aggregate signals and drive the need for fixed masts and infrastructure.

Noted.

We should consider the loss of amenity of our open spaces of bypass routes and the bad effects this may have on residents leisure and recreational pursuits.

Response ID: 107967776

Please do make sure that these documents inform the outcome - do not be afraid to say that the environmental impact of new roads means they should not be built, even if it means that capacity for single vehicles and lorries is not improved.

Noted.

Response ID: 108398966

This area has sites of historical importance which do not seem to have been considered and protected.

Please refer to the Environmental Report which has sought to assess the options and proposals for their 'likely significant effects' in relation to the historic environment. In particular, please refer to Para's 9.30 to 9.38.

Response ID: 108420529

Unclear no simple to understand impact assessment or mitigation of harm to the local environment
These proposals will significantly affect the local environment .

Please refer to the Environmental Report which has sought to assess the

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Consultation response

How the response was considered and addressed

Wildlife habitats / protected species .
Increase in light pollution traffic noise etc
Having commented to environmental concerns to Hertfordshire
environmental representative they had no idea of local wildlife ,
footpaths so no confidence in this team

options and proposals for
their 'likely significant effects'
in relation to biodiversity. In
particular, please refer to
Para's 9.10 to 9.20.

Response ID: 108758503

Comment 6.8 - A bypass will not reduce CO2 emissions long term by removing traffic from the centre of Hertford. Only removing the traffic completely or changing the fuel source (i.e. going electric) will reduce the overall emissions. The addition of a Bypass will contribute to emissions in it building and by allowing more vehicles into the road network. Due to the proposed location of the southern route close to the south of Hertford it will introduce new pollution to those living in the area.

Noted, the Environmental Report identifies that the bypass is considered likely to significantly reduce emissions within the designated AQMA in the centre of Hertford by providing a more suitable and attractive alternative route for HGVs in particular. The SEA does however note that alternatively this may also reduce air quality along the new bypass route. Please refer to Para's 9.2 to 9.9 in particular.

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5. How will the effects of the Corridor Strategy be monitored?

- 5.1 The SEA Regulations require that: “*The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.*”
- 5.2 The Regulations also state that the SEA Adoption Statement should set out “*...the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.*”
- 5.3 The purpose of monitoring is to measure the significant sustainability effects of a plan, as well as to measure success against the plan’s objectives. This will enable appropriate interventions to be undertaken if monitoring highlights negative trends relating to the relevant elements. It is therefore beneficial if the monitoring strategy builds on monitoring systems which are already in place.
- 5.4 To this end, many of the indicators selected for the SEA are based on data that is already being routinely collected at a local level by Hertfordshire County Council, Essex County Council, Local Authorities, statutory bodies (Environment Agency, Historic England and Natural England) and other partner organisations. It should also be noted that monitoring can provide useful information to inform the development of future plans and programmes, including future iterations of the Corridor Strategy.
- 5.5 **Table 6.1** therefore outlines a monitoring programme for measuring the Strategy’s implementation in relation to the SEA framework and outcomes, including areas where the SEA identified significant effects or where significant opportunities for an improvement in sustainability performance may arise. It also seeks to monitor where uncertainties relating to the appraisal findings arose and suggests where monitoring is required to help ensure that the benefits of the Strategy are achieved.

Table 5.1: SA monitoring programme for the A414 Corridor Strategy

SEA topic	Proposed measures
Air quality	<ul style="list-style-type: none"> • Number and status of AQMAs. • Local air quality monitoring being carried out as required by the Environment Act 1995.
Biodiversity	<ul style="list-style-type: none"> • Condition status and area of SSSIs. • Change in number and area of statutorily protected sites. • Change in number and area of non-statutory sites.
Climate change	<ul style="list-style-type: none"> • Number of interventions developed contrary to Environment Agency advice on flooding and water quality grounds. • Number of interventions completed with SuDS measures implemented.
Landscape and historic environment	<ul style="list-style-type: none"> • Number of interventions developed contrary to Natural England and Historic England advice. • Number of buildings on the Heritage at Risk Register.
Land, soil and water resources	<ul style="list-style-type: none"> • Number of interventions delivered on brownfield sites.
Population and community	<ul style="list-style-type: none"> • Trips undertaken by sustainable transport modes. • Net increases in cycle path network. • Net increases in footpaths/ PRoWs. • Road incident rates.

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- 5.6 It is recommended that monitoring is carried out on a regular basis in line with the process for the Corridor Strategy and wider plans.

