

## Core Strategy and Development Control Policies DPD



Independent Examination

# Sustainability Appraisal

Published 23 August 2007

**HD/CFD/SRS3**

## **Subject Response Statement 3**

### **Integrated Strategic Environmental and Sustainability Appraisal (SA) of Chelmsford Borough Council Local Development Framework (LDF)**

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#### **I. Introduction**

- I.1 This Subject Response Statement has been prepared as part of a series of statements to provide additional information on a range of themes that have been raised by objectors in their Amplified Statements, specifically in relation to Week 1 of the Independent Examination. They serve to provide additional information on a specific subject area and are cross-referenced to within the Council's individual responses to amplified statements.
- I.2 A series of Subject Response Statements have been prepared including the following subjects:
1. The Green Belt
  2. Housing Trajectory
  3. Sustainability Appraisal
  4. Infrastructure Delivery/Standard Charges
  5. Conformity with Regional Spatial Strategy
- I.3 This paper provides a sequential assessment of the Integrated Strategic Environmental and Sustainability Appraisal (SEA/SA) process of the Council's Local Development Framework carried out by the Council's retained consultants Entec, and the conclusions drawn in terms of their potential significant effects upon environmental sustainability, against identified sustainable development objectives and criteria.
- I.4 Many of the options that were considered at various stages in the SEA/SA process were subsequently submitted as representations to the Core Strategy and Development Control Policies Submission Development Plan Document November 2006. These are set out in the Alternative Development Sites and Boundary Changes Document.
- I.5 Key issues raised by respondents in respect of the Integrated SEA/SA of the Local Development Framework are summarised below:
- The assumptions set out in the Sustainability Appraisal are a fundamental weakness of the Council's approach.
  - Potential development sites have been ruled out from inclusion within the Core Strategy even though they score well in both independent and the

Council's Sustainability Appraisals while other sites have not been properly considered.

- The additional allocation of 2,000 new dwellings arising from the Panels Report on the East of England Plan have not been subject to Sustainability Appraisal, which means the plan fails soundness Test 2.
- Without a complete evidence base the Core Strategy is incompatible with the Regional Spatial Strategy and fails Test 6.
- The SA provides no assessment of the accessibility of new neighbourhoods other than at locations identified at Policy CP7. –
- The SA assumes that all the transport elements set out in the Local Transport Plan will be delivered. Failure to deliver any of the transport elements could, however, affect accessibility to one or other of the proposed new neighbourhoods. This would undermine the robustness of the SA and therefore the Core Strategy.

In response to the assertions made in a number of representations the following comments are made;

- It is strongly refuted that there is a fundamental flaw in the assumptions used in the Integrated SEA/SA prepared by Entec. The Borough Council's emerging Local Development Framework and associated Development Plan Documents have been subject to a thorough and continuous process of Sustainability Appraisal. The initial Scoping Report followed the format recommended by the ODPM in its then consultation draft 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks', Sept 2004. This included a thorough review of relevant documents and the collection and analysis of the relevant social, environmental and economic baseline conditions. It is also contended that the preparation of the Borough Council's Local Development Framework and constituent DPD's has had regard to the wider social, environmental and economic affects of the implementation of the associated policies and proposals on existing conditions. This considered the impact of policies and proposals against a suite of objectives emanating from the preparation of the East of England Plan.
- Where necessary the Borough Council's emerging policies and proposals, as set out in the various DPD's, have been reviewed and amended in response to recommendations set out in the Integrated SEA/SA. This included undertaking a revision of the SEA/SA to take into account the additional 2000 new dwellings allocated to Borough arising from the Secretary of State's Proposed Changes to the Draft East of England Plan published in December 2006. This assessment, available on the Borough Council's website, considered that the increase in housing numbers would unlikely to have any significant effects above those already identified in the main appraisals because the general approach to development remains the same. There will, however, be an increasing need to ensure the phased release of land. This also reflects the conclusions made in the Sustainability

Appraisal of the East of England Proposed Changes undertaken by ERM. This demonstrates that the Core Strategy was sufficiently robust and flexible to accommodate the additional housing.

- Through the continual process of Sustainability Appraisal the policies and proposals contained in the Development Plan Documents meet the procedural test iii in respect of the examination of Development Plan Documents.
- The Integrated SEA/SA considered a range of potential development options across the Borough. The assessments were based on the level of information submitted by developers, which varied in terms of detail and scope. Notwithstanding this, Entec concluded that a concentrated approach to development, focusing on existing urban areas, can support the viability of existing services and the provision of new services rather than a more dispersed approach.
- Through the continual process of Sustainability Appraisal the policies and proposals contained in the Development Plan Documents have been reviewed and where appropriate amended. This process has been supported by the continual development and updating of the Evidence Base. Government guidance notes that although the preparation of a broad evidence base is desirable authorities will need to be realistic drawing upon existing sources of information. Ultimately this will be dependent on the type of Development Plan Document being prepared. It is contended, therefore, that the Core Strategy is supported by an appropriate and up to date evidence base.
- The Borough Council's Core Strategy recognizes that an important element in the creation of sustainable communities is the delivery of the necessary social and transport infrastructure to support them. The assertion is strongly refuted that failure to deliver any of the transport elements could affect accessibility to one or other of the proposed new neighbourhoods. The Integrated SEA/SA considered a range of development options that contained different transport elements. Those that reflected the transport priorities set out in the Core Strategy scored more highly in appraisals. The Core Strategy is not, however, solely dependent on the provision of all the new transport elements identified in the Core Strategy. New development will also be able to take advantage of existing transport infrastructure provision and will afford the opportunity to enhance such provision.

## **2. Scoping Reports**

- 2.1 In May 2004 Entec prepared a draft Environmental Baseline Scoping Report. This provided a basis for the prediction and monitoring of significant environmental or other sustainability effects that may derive from the implementation of the Borough Council's emerging Local Development Framework. The report also identified the means by which the policies and proposals contained within the LDF were assessed for their significance.

- 2.2 The final Scoping Report that formed part of the Integrated SEA/SA of Chelmsford BC LDF was published in February 2005. This outlined the scope of the sustainability appraisal of the emerging LDF including the SA framework (consisting of objectives, indicators and targets) and the key issues facing the Borough. It undertook a thorough review of relevant documents and the collection and analysis of the relevant social, environmental and economic baseline conditions. The findings of this document assisted in the development and appraisal of options for the emerging LDF to enable the performance of the chosen, preferred spatial option, its policies and allocations to be monitored against the existing baseline conditions identified in the report.
- 2.3 As stated earlier the Scoping Report followed the format recommended by the ODPM. This advised that the pre-production scoping stage should conclude with the consultation with relevant authorities, the public and other key stakeholders on the scope of the appraisal and the key issues and possible options for solutions. Annex 7 to the consultation draft outlined the requirements for the scoping report as including: 'the broad options which are proposed to be considered in more detail (during stage B)'. This requirement was subsequently removed from the final guidance (November 2005).
- 2.4 In view of the guidance current at the time Entec provided a summary of Chelmsford Borough Council's draft options within the scoping report. It was considered that consultees would be in a more informed position to comment upon the assessment methodology and objectives if they had an appreciation of the options against which the assessment would operate.
- 2.5 Appendix D to the scoping report presented the baseline information. It does not purport to be an assessment of the options and the column headed 'evolution under do nothing' relates to the analysis of trends.

### **3 Option Testing**

- 3.1 In parallel with the preparation of the Scoping Report the Borough Council also tested a range of potential options that could be used to deliver its emerging spatial strategy. This process is outlined below but is described more fully in the Chelmsford LDF Background Topic Paper The Borough Wide Spatial Strategy BD/CFD/089.

### **4 Pre-engagement consultation**

- 4.1 In accordance with the principles of frontloading (see Ref. PPS 12, paragraph 4.3) the Borough Council issued an invitation to private developers and landowners who had submitted major development proposals to the withdrawn Local Plan to ask whether they wished their proposals to be evaluated by the Council, and its retained Sustainability Appraisal consultants Entec, against the projected 'greenfield' housing requirements up to 2021. This invitation was issued without

prejudice, to enable the Council, at the earliest possible time, to assess whether any privately promoted development proposals could form part or all of a subsequent growth option for the Borough which would conform to the principles and objectives of sustainable development, and contribute positively to the emerging Spatial Strategy.

4.2 A total of 15 development options were put before the Council in response to that invitation and were assessed by Entec's Integrated Strategic Environmental and Sustainability Appraisal (Appraisal of Private Sector Development Options 10 September, 2004.)

4.3 These options were:

- Battlesbridge and Runwell,
- Lathcoats Farm, Galleywood,
- North Wickford,
- Beaulieu park,
- Baddow Meads,
- Howe Green,
- NW Chelmsford,
- North of South Woodham Ferrers,
- Boreham Airfield,
- South of Great Baddow,
- Tabrums Farm,
- Sandon,
- East of Broomfield,
- Skeggs Farm.

4.4 The results of the appraisal provided the Borough Council with an indication of the strengths and weaknesses of each development option and to identify opportunities where further benefits can be achieved. The appraisal has taken into account the information made available by developers and recognizes that the submissions provided varying levels of detail.

4.5 The Council itself developed a series of options across the Borough – described as Spatial Scenarios for similar appraisal by Entec. These options encompassed 'brownfield' development within Chelmsford and South Woodham Ferrers as well as a range of potential 'greenfield' options ranging from large urban extensions through to small – scale village expansions across the Borough. This included locations within the Metropolitan Green Belt. Entec's separate assessment of the Borough Council's own Spatial Options was published in their Integrated Strategic Environmental and Sustainability Appraisal 'Assessment of Chelmsford Borough Council Spatial Options' dated 10 September, 2004.

4.6 These options were

- Urban intensification Chelmsford
- Urban intensification South Woodham Ferrers

- New neighbourhood NE/NW Chelmsford
- New neighbourhood S/SE Chelmsford
- Medium scale extension Chelmsford
- Smaller scale urban extensions
- Local urban extensions
- Local urban extensions SWF
- Medium scale urban extensions Wickford/Runwell
- Village expansion
- Village expansion south of Borough
- Village expansion north of Borough
- Village expansion east of Borough

4.7 One of the key conclusions within that report noted that “the assessment demonstrated that the continued urban intensification of Chelmsford represents the most sustainable form of development.” It acknowledged, however, that this would not provide sufficient sites to meet the identified housing need up to 2021 and that the Borough Council has therefore sought to identify a number of alternative options to accommodate the remaining identified need. The assessment identified, however, new neighbourhood areas to the North/East and North/West Chelmsford as the next most sustainable locations following the intensification of the urban area. In particular it noted that “the larger sites that are identified as forming this option are able to generate a more favourable assessment based upon the assumption that they are able to make provision for a wider range of services and facilities due to their critical mass. They are also close to existing employment locations, have good public transport links and are able to provide the quantum of development necessary to secure internal trip.”

4.8 *Summary*

4.9 The assessment of the developer options provided an indication of their strengths and weaknesses but given the varying levels of detail the appraisal should not be seen as a conclusive review. The ability for developers to contribute to the provision of a range of facilities and services should be recognised as finite. The appraisal did reveal, however, that sites that supported a range of services and facilities either in isolation or in association with existing or proposed residential development in accessible locations that are not environmentally sensitive will prove the most sustainable.

4.10 The assessment of the options prepared by the Borough Council sought to identify the strengths and weaknesses of each option with associated recommendations that could be made to improve their relative assessments. In addition to some of the specific recommendations greater consideration should be made to the social benefits the options deliver in particular their ability to contribute to the delivery of improved social, educational and recreational facilities, public open space and ecological enhancement.

## **5 Reg 25 Consultation**

- 5.1 In seeking to conform with Government policy and its own aspirations for the growth of Chelmsford, and also taking into account the initial SEA/SA assessments, it was clear to the Council that the greater part of the Borough's growth requirement should be met within urban Chelmsford, and that the 'greenfield' element of that growth requirement could be met without the need to release land from the Metropolitan Green Belt.
- 5.2 Extensive community and stakeholder consultation was undertaken at the Reg. 25 Issues and Options stage of the preparation of Core Strategy document. The Issues and Options consultation was accompanied by the publication of the Integrated SEA/SA Scoping Report (Prepared by Entec) (CD/CFD/008).
- 5.3 The Scoping Report considered the following Options including:
- Option 1 Do Nothing
  - Option 2 Urban Intensification
  - Option 3 Urban Extensions
  - Option 4 Limited Urban Extension and Village Expansion.
- 5.4 The report noted that in the context of the current housing requirement for the Borough the option of a new settlement was considered unviable. In developing future options the preferred spatial strategy would be guided by:
- the ability of new development to integrate with existing urban areas including defined settlements through a range of transport measures,
  - the need to create high quality urban environments,
  - the ability to create sustainable new neighbourhoods,
  - the function of the existing landscape such as rivers in shaping the character of the area,
  - the need to promote biodiversity and the need to protect valuable green spaces, and
  - the need to secure the enhancement and provision of new community facilities.
- 5.5 *Summary*
- 5.6 The report concluded that the baseline environment of Chelmsford appears to perform well against a range of sustainability objectives. The ability of the Borough Council's emerging Local Development Framework to improve upon environmental conditions will be dependent upon the extent the objectives of the plan fall within the influence of planning policy.

## **6 Reg 26 Consultation**

- 6.1 In November 2005 the Borough Council published for public consultation its Preferred Options Document (Reg 26). The document was prepared taking full account of the responses received to the Reg. 25 consultation, further evidence base work and the accompanying Integrated SEA/SA Report (prepared by Entec) (CD/CFD/009). Paragraphs 15.1 – 15.7 of the Preferred Options document describe the process by which options for meeting the ‘greenfield’ element of the Borough’s growth requirement were examined, and either discounted or carried forward for further assessment. Amongst the options discounted during this process as being contrary to the strategic approach being developed for the Preferred Options document were
- all options within the Metropolitan Green Belt,
  - Boreham Airfield,
  - Land North of Sandon and
  - options at the periphery of South Woodham Ferrers.
- 6.2 The Borough Council identified (at paragraphs 17.1 – 17.2) Option 1, the provision of two new neighbourhoods to the North of Chelmsford, as its Preferred Option. It noted that that “Option 1 offers the best prospect for achieving a sustainable pattern of development in the borough up to 2021 and beyond. By the creation of two new neighbourhood areas to the north-east and north-west of the existing urban area of Chelmsford, the benefits that can be secured by the delivery of new social and transportation infrastructure linked to new development will be available to much wider sections of the community than would be the case with other options, which are only likely to achieve more realised benefits.” It further noted “It is a key objective of both the Community Plan and the Local Development Framework that new development achieves a broad range of socio-economic, environmental and accessibility objectives, and Option 1 is the best performing option in this respect.”
- 6.3 The accompanying Integrated SEA/SA report summarises Entec’s sustainability assessment of the Preferred Borough-wide Strategy and the proposed Growth Options at Section 4.2 – 4.3 of that document (CD/CFD/009).
- 6.4 Entec concluded at Section 7 that: “The Preferred Borough-Wide Strategy for the future development of Chelmsford Borough is outlined within the accompanying Preferred Options Consultation Document which is issued with this report. The Council’s preferred option is one that seeks to concentrate development within existing urban areas protecting and enhancing the environment, protecting the Metropolitan Green Belt and supporting the rural communities that lie beyond it.

Furthermore the Council seeks to support the continued promotion and development of Chelmsford as a key regional centre whilst recognising the need to secure local improvements in South Woodham Ferrers. Accessibility and the securing of new infrastructure are also seen as essential components this vision. Finally, the Council recognises that the housing targets set for it are such that there will be a requirement for the development of 'greenfield' sites beyond the existing urban boundary of the town. It is the intention that, if required, they will be developed mainly towards the end of the LDF period.

6.5 Entec has appraised the options for Chelmsford and considers that the emphasis on a concentrated approach to development, focussed upon the existing urban area of Chelmsford, will contribute to sustainable development. This is because a concentrated approach to development supports the viability of existing services, including public transport provision, and can also support the provision of new services over and above a more dispersed approach to growth.

6.6 The Preferred Borough-Wide Strategy is focussed on the accommodation of 14,000 homes over the period to 2021. It will be essential for the Core Strategy to also deliver sufficient employment provision over the same period so that Chelmsford's role as sub-regional centre is strengthened and thereby its role as a commuter town to London reduced. Chelmsford's urban area, including the town centre, supports the greatest range of employment opportunities, open space, social and cultural, health and education facilities within the borough. A resident population focussed upon this area has shorter distances to travel to access these facilities and a choice of modes of transport is often more readily available. A concentrated approach to development therefore has the potential to reduce emissions, particularly those related to climate change, over a dispersed approach."

6.7 *Summary*

6.8 The Integrated SEA/SA concluded that Option 1 (two new neighbourhoods to the north of Chelmsford) contributed positively to a number of sustainability objectives. These are particularly focused upon an encouragement to reduce the use of private cars and this is directly related to improved accessibility to existing and proposed services and facilities. This option should also encourage the greater use of public transport and is well related to existing neighborhoods of deprivation within Chelmsford and provides an opportunity to strengthen existing services and facilities and to promote new facilities through increase in catchment population.

## **7 The Core Strategy and Development Control Policies Submission Development Plan Document November 2006**

7.1 In November 2006 Entec published their Integrated Strategic Environmental and Sustainability Appraisal of the Core Strategy and Development Control Policies Submission DPD. The appraisal noted that a full range of Core Strategy and Development Control Policies were considered to address all of the SA objectives. Full coverage was provided to the economic and social objectives, and to almost all

of the objectives grouped under the environmental heading. It noted that certain criteria are covered more comprehensively than others and it particularly noticeable that criteria concerned with resource use waste and energy receive less coverage. This reflected to a degree the scope of the documents appraised and the function of the Borough Council as local planning authority.

7.2 The appraisal also noted that the planning policies contained within the DPD addressed significant sustainability issues such as accessibility, economic diversification, the retention and provision of local services affordability and design, town centres renewable energy and protection of the countryside and open spaces. Many of these issues were identified within the Sustainability Appraisal Scoping Report of February 2005 as challenges were addressed through the LDF process. It considered that whilst a small number of policies may have been appraised as having potentially negative effects against particular SA criteria it should be remembered that they will be implemented as a suite of policies rather than in isolation. No negative cumulatively significant effects were identified and it is considered that the document was rising to the challenges identified in the appraisals.

7.3 *Summary*

7.4 The report considers that the policies of the plan are considered to address all of the Sustainability Objectives set out the appraisal. The strategic approach set out in the strategy moves Chelmsford towards achieving sustainable development. In particular the creation of two new neighbourhoods at North Chelmsford positively contributes to achieving a number of sustainability objectives.

## **8 Conclusion**

8.1 In summary the Borough Council's position is that:

- a) The Borough Council's emerging Local Development Framework and associated Development Plan Documents have been subject to a thorough and continuous process of Sustainability Appraisal in accordance with Government guidance.
- b) The preparation of the LDF and associated DPD's have regard to the wider social, environmental and economic affects of the implementation of the policies and proposals contained therein on existing conditions.
- c) Where necessary the Borough Council's emerging policies and proposals, as set out in the various DPD's, have been reviewed and amended in response to recommendations set out in the Integrated SEA/SA.
- d) Through the continual process of Sustainability Appraisal the policies and proposals contained in the Development Plan Documents meet procedural test iii in respect of the examination of Development Plan Documents and demonstrate the Borough Council's spatial strategy is sound.

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