

# **Chelmsford Borough Council**

## **Chelmsford Core Strategy Strategic Environmental Assessment and Sustainability Appraisal**

Adoption Statement

20 February 2008

Entec UK Limited



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**Report for**

Paul MacBride  
Chelmsford Borough Council  
Civic Offices  
Duke Street  
Chelmsford

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**Main Contributors**

Kirsty Tydeman  
David Kenyon

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**Issued by**

.....  
Kirsty Tydeman

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**Approved by**

.....  
David Kenyon

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**Entec UK Limited**

Canon Court  
Abbey Lawn  
Abbey Foregate  
Shrewsbury SY2 5DE  
England  
Tel: +44 (0) 1743 342000  
Fax: +44 (0) 1743 342010

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# Chelmsford Borough Council

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## Document Revisions

No.	Details	Date
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# 1. Introduction

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## 1.1 Introduction

Entec UK Ltd (Entec) was commissioned by Chelmsford Borough Council to undertake a Sustainability Appraisal of the emerging Core Strategy and Development Control DPD in 2004. Following Submission of the DPD to the Secretary of State in late 2006 and subsequent examination, the document was adopted on 20 February 2008. This Adoption Statement accompanies the adopted DPD.

## 1.2 SA/SEA process

As part of the Local Development Framework preparation process emerging Development Plan Documents and Supplementary Planning Documents must be subject to a Sustainability Appraisal in line with guidance found in the European Directive 2001/42/EC, the objective of which is *'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development'* (Article 1). These aims are consistent with a range of UK Government policies on the environment and sustainable development.

The Directive applies to all relevant plans and programmes whose formal preparation began after 21<sup>st</sup> July 2004. The Directive has been transposed into UK legislation through the Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No. 1633)

The Directive defines 'environmental assessment' as a procedure comprising:

- Preparing an Environmental Report on the likely significant effects of the draft plan or programme;
- Carrying out consultation on the draft plan or programme and the accompanying Environmental Report;
- Taking into account the Environmental Report and the results of consultation in decision making; and
- Providing information when the plan or programme is adopted and showing how the results of the environmental assessment have been taken into account.

This report seeks to address the requirements of the final bullet point.

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## 1.3 Sustainability Development and the Local Development Framework

Section 39 of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to prepare their DPDs with a view to contributing towards the achievement of sustainable development. Sustainability appraisal is a systematic and iterative appraisal process that should incorporate the requirements of the SEA Directive. The assessment is to be used as a tool for integrating social, economic and environmental considerations into the preparation of a plan or strategy, by considering the effects of implementing the strategy during its preparation and before its adoption.

## 1.4 Adoption Statement

The findings of the sustainability appraisal must be taken into account in the preparation of the Core Strategy and Development Control Policy DPD and the purpose of this Adoption Statement is to show how this was done and what changes were made to the DPD as a result. Government guidance<sup>1</sup> outlines the requirements of an adoption statement:

*'3.5.13 LPAs must produce an adoption statement to accompany the adopted DPD outlining how they have taken the findings of the full SA process into account, and how Sustainability considerations more generally have been integrated into the DPD. This summary must provide enough information to make clear any changes made to the DPD as a result of the SA process and responses to consultation, or why no changes were made or options were rejected.'*

*3.5.14 the adoption statement could also provide information on how monitoring will be carried out during implementation of the DPD. The SA Report will already have documented proposed monitoring measures, and they can now be confirmed or modified in the light of consultation responses and/or the examination.'*

More specifically the Environmental Assessment of Plans and Programmes Regulations 2004 (16) (3) and (4), require that that the statement must show;

1. How environmental considerations have been integrated into the plan or programme;
2. How the environmental report has been taken into account;
3. How opinions expressed and results of public consultation have been taken into account;
4. The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with;
5. The measures that are taken to monitor the significant environmental effects of the implementation of the plan or programme.

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<sup>1</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents; ODPM 2005

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This Adoption Statement adheres to the above requirements and it also provides information on how monitoring will be carried out during the implementation of the DPD. It highlights the amendments that were made to the DPD following consultation exercises and notes the implications of those amendments for the sustainability appraisal.



## 2. How the SA/SEA influenced the Core Strategy and Development Control Policies

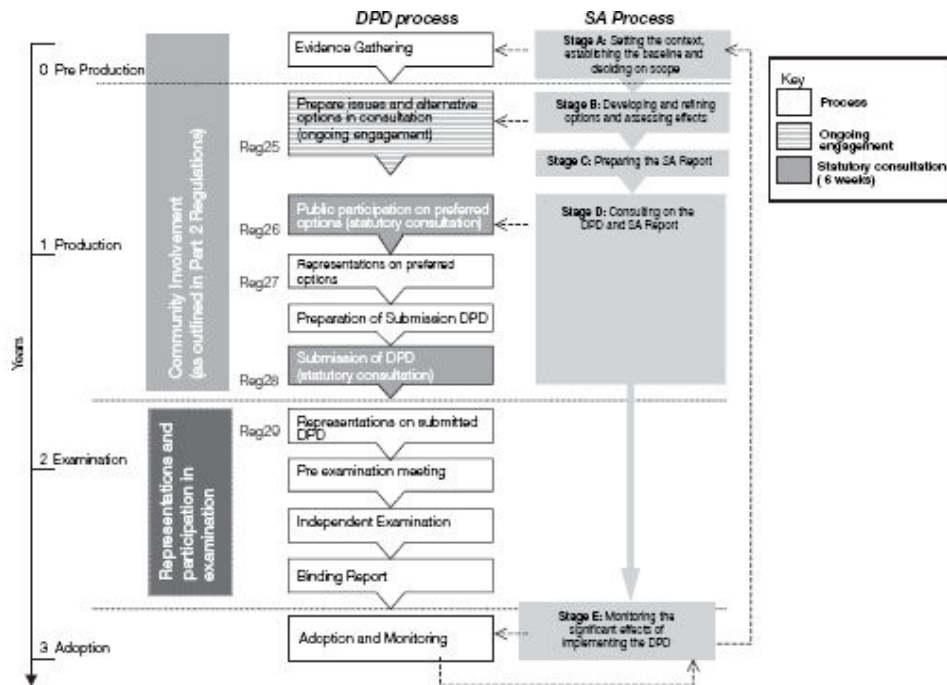
### 2.1 Introduction

This section identifies how the Core Strategy was informed by environmental considerations. It also demonstrates how the recommendations of the SA Report, and associated reports, were taken into account and how the consultations responses received to those reports addressed. It summarises the options/alternatives appraisal process which led to the selection of the most sustainable Preferred Option.

#### 2.1.1 The Integration of Process

Sustainability appraisal is an integral part of the DPD production process and as such it follows five stages which are designed to link into and inform the development of Core Strategy and Development Control policies. The integration of SA into DPD preparation is fundamental to sound plan making and Figure 2.1 illustrates how the two processes work together.

Figure 2.1 The DPD preparation process



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Section 2.2 below details the SA process and describes how it has influenced the development of the CBC Core Strategy and Development Control Policies DPD.

## 2.2 Initial Scoping

The scoping process began in March 2004 when a methodology for undertaking the appraisal was agreed with Chelmsford Borough Council and a draft scoping report was prepared which outlined the draft sustainability framework and the documents to be sourced to identify baseline conditions within the bough. This document was issued to selected environmental bodies including English Heritage and the Environment Agency and to the Government Office for the East of England (GO-East) on 22 March 2004 for Consultation. In September 2004 the ODPM<sup>2</sup> published new guidance on sustainability appraisal in a consultation paper, '*Sustainability Appraisal of Regional Spatial Strategies and Local development Frameworks*'. In light of this new guidance and the responses received from the selected environmental bodies, referred to above the methodology was reviewed and a revised Scoping Report issued for consultation in February 2005.

In response to the initial consultation the following change were made to the final scoping report:

### **English Heritage**

English Heritage welcomed criteria concerned with protecting and/or enhancing buildings, areas and features of historical and cultural importance but suggested that the importance of protecting the historic environment should be reflected more generally throughout the assessment with the inclusion of a general issue on protecting and enhancing the historic environment. Similarly it considered that the criteria/objective to promote culture should reference the historic environment. Patterns of location of development could have been strengthened by inclusion of reference to conservation led regeneration.

### *Response*

The objectives to protect and enhance the wider historic environment were reviewed. The definition of culture to include the historic environment was expanded. A reference to conservation-led regeneration was included.

### **English Nature**

English Nature advised that consideration should be given to current threats and trends. Indirect development effects were also considered to be a potential issue for the environment outside of Chelmsford Borough. The possible effects of climate change on inter-tidal habitats was also highlighted and it was recommended that the SA should consider how plans, policies and programmes may have negative/positive effects through preventing replacement of inter-tidal habitats and/or encouraging the provision of replacement. Visitor pressure on designated conservation sites brought about by increased access was also raised. Similarly the objective to increase development on brownfield sites could detrimentally effect protected species and habitats.

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<sup>2</sup> Office of the Deputy Prime Minister now Dept of Communities and Local Government

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*Response*

Amendments to objectives and criteria to recognise the effects that development can have outside the Borough boundary, including rivers and coastal estuaries were made. Increased access to sensitive site should be managed.

**Environment Agency**

Development should be located on sites that are not at high flood risk. Furthermore development should seek to reduce overall flood risk by restoring functional flood plain and natural flood flows.

The inclusion of an additional criteria was recommended concerning water resources: 'Will it encourage abstraction dependant development only where water is available for extraction?' Additional guidance was provided on appropriate data sources.

*Response*

SA objectives were reviewed to include reference to restoring functional flood plain and flood flows. Recognition was provided that new development may increase water abstraction rates that are already unsustainable.

**Government Office for the East of England**

Advice was provided to consider the requirements in the then forthcoming integrated sustainability appraisal guidance (subsequently published as ODPM Consultation paper on SA of RSS and LDFs, September 2004). Reference was made to the publication of the RSS14 and its SEA/SA and LUC as this would be a key document in helping to set the sustainability objectives for LDFs and providing baseline data. Advice was provided upon the type and detail of documents to scope and the range of other bodies that should be consulted throughout the SA process and advice is provided on the establishment of the evidence base.

## 2.3 Final Scoping Report

A second, final Scoping Report was issued in February 2005. This was consulted upon and a number of comments received which are enclosed at Appendix A, together with Entec's responses. The Scoping Report included for a compatibility assessment of the then proposed Core Strategy Objectives against the SA Objectives which was reported within Appendix C. The following recommendations were made:

**Plan Objective recommendations**

The plan objective sought to deliver housing in response to need, whilst the SA objectives aim to provide sustainable patterns of development. Houses should meet need but in sustainable, accessible locations.

*Recommendation: To ensure the provision of types and tenures of housing that meets the needs of the whole community in a sustainable way, including affordable and special needs housing, to create balanced communities.*

The plan objective sought to manage growth in a sensitive and positive way with no direct reference to sustainability as covered in the corresponding SA objectives. The word 'positive' was considered vague.

*Recommendations: To manage future growth in a sensitive and sustainable way.*

The plan objective sought to provide facilities, whilst the SA objectives recommend access to facilities.

*Recommendations: To provide and improve access to social, educational, leisure and sports facilities which meet the needs of the Borough's residents*

The plan objective ensured the provision of land and buildings to facilitate economic competitiveness. The SA objectives suggest appropriate development (land and buildings) with regard to the environment and sustainability.

*Recommendations: To maintain the Borough's economic competitiveness by ensuring the appropriate provision of land and buildings that respond to changing economic circumstances in a sustainable manner.*

The revised SA objectives were considered by Borough Council and reported within the Preferred Option Report, (which is discussed in greater detail in section 2.4). The changes made in response to the SA Scoping Report recommendations, and wider consultation responses are presented within table 2.1 and demonstrate how consultation responses were taken into account and how environmental considerations informed the development of the Core Strategy at this stage.

**Table 2.1 Amendment to Core Strategy Objectives Arising from SA recommendations within the Scoping Report.**

<b>Original Objective</b>	<b>Preferred Strategic Objective</b>
To ensure the provision of types and tenures of housing that meets the needs of the whole community, including affordable and special needs housing, to create balanced communities.	BC1: Meet the housing needs of the whole community through the provision of types and tenures of the housing facilities including affordable and special needs housing and create balanced communities through a mixture of housing for different housing types.
To manage future growth in a sensitive and positive way.	MG2: Contain urban growth by re-use of urban land and imposition of rural boundaries.
To provide social, educational, leisure and sports facilities which meet the needs of the Boroughs residents.	QL1: Provide high quality social, educational, leisure and sports facilities, excellent green spaces and a full range of cultural opportunities for meeting, worship, entertainment and celebration.
To maintain the Borough's economic competitiveness by ensuring the provision of land and buildings that respond to changing economic circumstances.	ECP1: Maintain the Borough's economic competitiveness in a region of major growth and change by responding positively to economic change.

## 2.4 Appraisal of Issues and options

Entec undertook an appraisal of 15 development options promoted by developers, land owners and agents to enable Chelmsford Borough Council (CBC) to consider their proposals against the projected green field housing requirements of the Borough in September 2004. The subsequent

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report contributed towards an options assessment required as part of an Integrated Strategic Environmental and Sustainability Appraisal to support the preparation of Local Development Documents.

Undertaking such an appraisal of the promoted development options enabled an assessment to be made of their potential significant effects upon environmental sustainability, against identified sustainable development objectives and criteria. The drawbacks and weaknesses of an option in sustainability terms may be accepted, but the appraisal will make the implications clear and transparent. The process also served to identify where objectives were favourably supported by particular options, and indicated whether further benefits could be achieved. A summary of the conclusions is presented below.

- The larger development sites proposed at Boreham Airfield, and Land Northwest of Chelmsford generated a generally positive assessment. This did not necessarily indicate that these were the most sustainable options. The appraisal does not weight the value of certain criteria whereas the planning system does in some cases operate a hierarchical approach; for example valuing the protection of Green Belt over Green Wedge or SSSIs above local designations. As a result various factors needed to be taken into consideration when determining which sites should be taken forward in the preparation of the LDD.
- The sites at Baddow Meads and at Land South of Great Baddow were also assessed positively, because they included for the provision of employment uses and in the case of Baddow Meads propose a linear Country Park. Despite its proximity to these sites, the Sandon proposal did not score as highly over as wide a range of objectives. If Sandon was to be taken forward, opportunities for improving the sustainability assessment of this site, for example through an improvement to the mix of uses proposed, were recommended for investigation.
- Smaller option sites that proposed housing only e.g. Galleywood and Lathcoats Farm tended to receive a greater proportion of negative assessment despite their proximity to the main urban area and existing services and facilities. This is because they provided fewer opportunities to deliver a wider mix of uses. However such sites could contribute to the continued viability of existing services, and considered together, or with other smaller sites, they could still deliver substantial infrastructure or community benefits through the use of section 106 agreements.
- Opportunities existed to encourage developers to improve the sustainability of all sites. It was clear that developments that promoted green travel plans, renewable generation and efficiency of energy use, water efficiency and use of recycled materials for example would be appraised more favourably. It was suggested that the Borough Council make clear their requirements for such opportunities to be taken.

#### **Transition to preferred options:**

Following the appraisal work detailed above the Council took forward the options and refined them to a smaller set of 8 distinct options for the future development of the Borough. Entec was instructed to evaluate these spatial scenarios for expansion which included four urban extensions to the north of Chelmsford and for looking at development options around the rest of

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the Borough. The spatial options identified were based on the requirement for the Council to provide sufficient land for 14,000 homes in the Borough.

The options identified by the Council were:

- Option 1A: Medium scale growth to the north-east and north-west Chelmsford;
- Option 1B: Major growth to north-east and north-west Chelmsford;
- Option 1C: Growth to north-east Chelmsford and major growth around Broomfield Hospital;
- Option 1D: Major growth to north-east Chelmsford around New Hall;
- Option 2: Proposed new neighbourhoods at Chelmsford South and South-East;
- Option 3: Proposed new urban extension at south Woodham Ferrers and Wickford/Runwell;
- Option 4 (north): Expansion of northern villages;
- Option 4 (south): Expansion of southern villages.

### **Conclusions and recommendations**

The appraisal identified the north of Chelmsford (Options 1A and 1B) as a good location for growth being in proximity to a good range of existing services and facilities. The north west of Chelmsford also contains the most deprived wards within the Borough and as such development on the scale proposed could bring forward a range of additional social infrastructure benefits e.g. social and key worker housing and support better public transport. The scale of the development suggested could also support internalised trips whilst the integration with the existing urban area would also facilitate the increased use of existing services and facilities.

Spatial Option 2 sought to readdress the historic pattern of growth in the Borough by promoting development within the Green Belt to the south of Chelmsford. Development in this location would also provide an opportunity to help regenerate some of the older centres in south of the Borough. However, unlike Option 1, the option offered fewer opportunities for direct physical integration with the existing urban area and were this option to be taken forward further it was recommended that further consideration should be given to linkages between the development sites and existing neighbourhoods. It was considered that not all of the proposed development sites were within the accessibility threshold to existing services and facilities. Furthermore the scale of development proposed was considered unlikely to support a 'district' size centre that would also benefit the existing urban area

Spatial Option 3 proposed two growth areas in the south of the Borough, one to South Woodham Ferrers and the other to Wickford. Both locations were relatively distant from the main urban area of Chelmsford, and the range of services and facilities which it offered. In addition the option were not of sufficient size to function in a self sustaining manner and it was considered that there development would lead to increased vehicle movements to and from the urban area.

Option 4 identified growth opportunities for development in villages to the north and south of the Borough. The assessment of villages demonstrated that growth of the scale proposed could bring substantial benefits in the form of securing affordable housing for the settlements and

support for existing services and facilities although some of the villages, such as Rettendon Place and Great Leighs lacked these facilities. Whilst limited development in the villages could be sustainable, the appraisal concluded that they would not be appropriate locations for the substantial number of dwellings and associated development required of the Core Strategy.

The result of both options assessment concluded that the most appropriate locations for substantial development outside of the urban area would be to the north east or north west of the urban area of Chelmsford. Furthermore it was concluded that these urban expansions should be of sufficient size so as to provide a range of appropriate services and facilities both to internalise trips, and to improve accessibility from the existing neighbourhoods at the edge of the urban area.

The Borough Council sought to implement the recommendations of the appraisals in the development of the Preferred Option and as such acted upon the environmental considerations raised by the appraisal process. The Preferred Option sought to concentrate development within the urban area of Chelmsford and in addition it identified development in ‘urban extensions’ to the north east and north west of the town. These extensions would be physically adjacent to existing neighbourhoods and of a size sufficient to sustain a range of services and facilities. The appraisal findings relative to this Preferred Option are considered in the next sub-section.

## 2.5 The Preferred Option

The Sustainability Appraisal report of the Core Strategy and Development Control Policy Preferred Option took place in late 2005 with the report published for consultation in November 2005. The document provided an assessment of the Preferred Options of the Core Strategy and the Development Control plan policies, including the Strategic Objectives.

### Strategic Objectives

The strategic objectives outlined CBCs intention for the LDF. The Preferred Options were intended to support the delivery of these objectives, supplemented by Core Strategy and Development Control policies. A previous set of strategic objectives were considered by Entec for their compatibility with the SA Objectives and this was reported within the SA Scoping Report. Recommendations were also made for their improvement. These recommendations were taken forward by CBC into the revised set of objectives, see Table 2.1 above. Additional recommendations for improvements to some of these final, strategic objectives were also made as part of the review of the Preferred Option and these recommendations are presented in Table 2.2 below.

**Table 2.2 Preferred Option Core Strategy Objective Recommendations**

Preferred Strategic Objective	SA Recommendation
BC1. Meet the housing needs of the whole community through the provision of types and tenures of the housing facilities including affordable and special needs housing and create balanced communities through a mixture of housing for different household types.	Reference <i>Key Workers</i> Housing

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MG5. Direct growth to the most sustainable locations in the borough and ensure new and existing neighbourhoods are easy to get to and well integrated with strategic route networks.	Integration <i>with existing neighbourhoods</i>
QL3. Improve road safety and avoid pedestrian route severance by managing vehicle traffic in residential and shopping areas.	Managing and <i>reducing</i> traffic.

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Preferred Strategic Objective	SA Recommendation
EPE1. Protect the borough's natural and built resources, biodiversity and countryside.	Should also refer to <i>enhance</i>
EPE2. Ensure development has a net beneficial effect on the local and global environmental by reducing pollution and waste, reducing fossil fuel-based energy consumption and increasing consumption of energy from renewable resources.	Also refer to reduction in <i>resource</i> use, including water and aggregates
MG4. Minimise the need for car travel by locating new development where alternative modes of transport are practicable and by improving public transport.	Also <i>reduce car use</i>
QL2. Improved links between new development, surrounding neighbourhoods and the town centres by efficient local route networks and public transport.	Will need definition of ' <i>efficient route networks</i> '
ECP5. Support essential commercial transport movement related to borough business activity on road and rail network.	<i>Minimise</i> commercial road transport but support essential
QL1. Provide high quality social, educational, leisure and sports facilities, excellent green spaces and a full range of cultural opportunities for meeting, worship, entertainment and celebration.	... high quality <i>accessible</i> social.... QL1 should also reference access to facilities as well as provision.
MG1. Manage and limit growth to that capable of being accommodated by the strategic infrastructure and the community support facilities of the Borough.	And by <i>environmental capacity</i> , e.g. areas liable to flood

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Preferred Strategic Objective	SA Recommendation
ECP2. Reinforce Chelmsford town's leading sub-regional economic role by attracting new commercial investment and reinforcing the town's attractiveness and competitiveness by enhancing civic and cultural activity.	Protection of environment in town centre is important also.
ECP4. Enhance the viability and vitality of South Woodham Ferrers town centre and secondary, local centre.	
BC3. Reduce deprivation and improve resident's health and quality of life by targeted economic and community development.	Health can also be improved through targeted environmental improvements.
No objective	No reference to supporting opportunities to lead a healthy, active life in the objectives

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Following the assessment of the Strategic Objectives Entec undertook an appraisal of the spatial options, including the Preferred Option. Each option included for the concentration of development within the urban area of Chelmsford, (in line with previous SA recommendations) and Entec's appraisal confirmed that the emphasis on a concentrated approach to development, focussed upon the existing urban area of Chelmsford, would contribute to sustainable development. This is because a concentrated approach to development supported the viability of existing services, including public transport provision, and could also support the provision of new services over and above a more dispersed approach to growth.

The future development of Chelmsford in the period up to 2021 which includes for a substantial level of housing, retail and infrastructure growth in particular can only be accommodated wholly within the urban area at the expense of environmental matters such as air quality, noise, open space, biodiversity and flood risk. Consequently the Council identified a level of development that would come forward outside but adjacent to the urban area. The options for the size and location of these urban extensions were previously appraised and have been reported above. The Preferred Option identified the Council's preferred choice for the location of the urban extensions, and it included two alternative choices. The Preferred Option was informed by the previous options appraisals undertaken by Entec which concluded that locations to the north of the urban area were likely to be more sustainable. All three options were assessed and recommendations were made to mitigate any adverse effects and to enhance positive ones. These were reported within the SA Report and are reproduced within Table 2.3 below together with a summary of how they were responded to within the subsequent Submission DPD.

**Table 2.3 SA Report of Preferred Option; Suggested Recommendations for Mitigation or Enhancement**

Significant Effect	Mitigation/ Enhancement	Action taken within the subsequent Submission DPD
<b>Preferred Borough Wide Strategy</b>		
Employment	Seek to match job growth with household growth thereby mitigating against additional out-commuting	This is an inherent objective of the Core Strategy
Congestion	Consider opportunities for demand management in conjunction with improvements to public transport provision, cycling and walking improvements	Demand management is referenced within Policy DC45 of the Submission DPD
NE Bypass and Cross Valley Link	Careful consideration of environmental impacts and if taken forward should be undertaken as part of a comprehensive package of sustainable transportation improvements.	Environmental Plan policies will ensure that consideration is provided
SUDs, water efficiency	Policy initiatives outlined should be extended to all forms of development over defined thresholds rather than just housing.	DC27 refers to all developments
Air Quality	Public transport improvements, demand management, improvements to accessibility of local services, location of new development in most accessible locations	A suite of policies have been developed to deliver this mitigation.
Energy usage and emissions	Consider the energy generated in the construction and occupation of buildings:	Policies on building design and orientation, renewable energy and accessibility by sustainable transport

	<ol style="list-style-type: none"> <li>1. built form (e.g. reduce surface area with terraces and low rise flats);</li> <li>2. orientation for solar gain and shading, daylight, natural ventilation</li> <li>3. district heating / combined heat and power</li> <li>4. on-site/ off-site renewables (on-site is often not the most cost-effective, so avoid treating it as an end in itself)</li> <li>5. energy use travelling to and from development – how often, how far, how much by car?</li> </ol>	modes are included
Car usage	<p>Consider sustainable transport hierarchy:</p> <ol style="list-style-type: none"> <li>1. avoid/ obviate travel</li> <li>2. walk, cycle</li> <li>3. bus, rail (light / heavy) – maximise load factors, e.g. by concentrating journeys (compact multi-functional town centres). Rail freight</li> <li>4. car – maximise load factors, e.g. by multi-occupant vehicle lanes, preferential parking</li> </ol>	No explicit reference to a hierarchy although policies do consider the individual elements.
Reduction in road freight	Require green travel plans for all commercial development, over a defined threshold.	Travel plans to be required for most development
Health	Consider threshold size for requiring Health Impact Assessment.	Thresholds provided at Policy DC9
Skills	Seek to link proposed employment sites with skills training in advance of new development	Recognition within Policy DC54
Cultural heritage, biodiversity	Policies should seek to enhance as well as protect. Reference within supporting text to policies could include reference to English Nature publications 'Biodiversity by Design' and 'Designing Communities for people and biodiversity'.	DC15 seeks enhancement
<b>Alternative Greenfield Options</b>		
Urban Intensification	<p>Identify and protect key areas of habitat within urban area, particularly alongside waterways. New development to take into account requirement for soft edges to water.</p> <p>Identify development sites following sequential approach to flood risk. Where development in flood zone 3 takes place require and identify appropriate mitigation activities.</p> <p>Maintain protection of open space network and seek enhancement, including improved linkages for cycling and walking within town centre.</p>	<p>Policies within the Submission DPD seek to protect areas of open space within the urban area, areas of flood risk.</p> <p>Opportunities for cycling. Walking identified and areas at flood risk avoided.</p>
Medium scale expansion NE/NW Chelmsford	<p>Maximise opportunities for improvements to sustainable transport provision. Identify how corridors between new neighbourhoods and town centre can be improved environmentally.</p> <p>Identify standards of service provision in existing neighbourhoods, seek to ensure that new facilities complement and support.</p>	Some of these requirements would be addressed within the site specific AAP. However the policy framework does provide for these recommendations to be implemented..

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	Maintain protected areas and seek habitat creation.	
Large Scale expansion NE Chelmsford	<p>Maintain setting of New Hall and ensure no detrimental impact on Channels Golf Club wildlife site.</p> <p>Maximise opportunities for improvements to sustainable transport provision. Identify how corridors between new neighbourhoods and town centre can be improved environmentally.</p> <p>Identify standards of service provision in existing neighbourhoods, seek to ensure that new facilities complement and support.</p>	Some of these requirements would be addressed within the site specific AAP. However the policy framework does provide for these recommendations to be implemented..
Local urban expansion plus expansion of Key Villages	<p>Identify standards of service provision in existing neighbourhoods, including villages, seek to ensure that new facilities complement and support.</p> <p>Seek to protect existing habitats particularly around Danbury. Seek improved public transport provision especially Bicknacre and Danbury</p>	Some of these requirements would be addressed within the site specific AAP. However the policy framework does provide for these recommendations to be implemented..

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An essential element of the Preferred Option were the policies that would be developed to secure implementation, to monitor, and to reconcile any negative impacts. The policies were identified within the Council's Preferred Options document as 'Policy Choices'. The choices were provided under the five Policy themes and associated objectives.

The policy choices were reviewed against the sustainability objectives. The key recommendation concerned the issue of climate change. There were a number of policies that would reduce contributions to climate change (sustainable transport, renewable energy generation), however was no specific Core Strategy policy that specifically addressed this issue. The UK Government Sustainable Development Strategy identifies climate change and energy as one of the four priority areas for action; it was therefore recommended that this is reflected within the Core Strategic Policies.

## 2.6 SA Report of the Submission DPD

The SA of the Preferred Options was published in November 2005 and accompanied the Council's consultation on the Preferred Option. Following this consultation Chelmsford Borough Council resolved to continue with the Preferred Option as previously put forward. To that end it was considered that as no significant changes had been made to that option and as such the SA report of November 2005 would remain valid.

The Sustainability Appraisal which accompanies the Core Strategy and Development Control DPD was therefore a re-presentation of the final SA report prepared for the public consultation on the Preferred Options in November 2005 and in line with Government guidance and advice an annex was prepared to explain the rationale behind this decision. In addition the Annex reports upon the minor amendments made by the Borough Council to the Plan Objectives and it provides the findings of the sustainability appraisal of the detailed Core Strategy and Development Control Policies which evolved from the 'policy choices' outlined within the Preferred Option report. These policies were concerned mainly with the amount and location of development together with the means by which it will be controlled to ensure that positive environmental, economic and social events are maximised and negative impacts minimised.

### Plan Objectives

The Preferred Options SA Report (November 2005) reported Entec's review of the Preferred Option Objectives and it provided some sustainability recommendations to enhance the environmental considerations that were already integrated within the Plan, (Table 2.2 above). In response to these recommendations certain Core Strategy Objectives were amended, such as EPE2. Other recommendations made by Entec, most notably to include reference to the *reduction* of traffic in QL3 and MG4; to *enhancement* as well as protection within EPE1; the *minimisation* of commercial road transport in ECP5 and reference to *environmental capacity* in MG2, were not taken forward although it was considered that these are minor refinements and that the overall thrust of the objectives remained compatible with environmental considerations.

### Core Strategy and Development Control Policies

The SA concluded that the plan policies support the over-arching spatial approach to development within the Borough which seeks to promote development in urban areas followed by adjacent Greenfield extensions. The appraisal assessment concluded that the policies within the Core Strategy had taken environmental considerations into account and that it had responded to recommendation contained within the SA Report. As such it was considered that it should move future development within the Borough towards the goal of sustainability. The appraisal found that both the Core Strategy and Development Control Policies seek to concentrate within the main urban areas of the Borough with significant sustainability outcomes including reductions in greenhouse gas emission, improved accessibility to local services and the creation of a high quality built environment with the protection of environmental assets.

The direct recommendation that stemmed from the preferred option appraisal of 'policy choices', that a specific policy on climate change be included, was addressed by the Council within Core Strategy Policy CP2. Further references to climate change are to be found within the supporting text to Policies CP10, CP11, DC24 and DC25.

Notwithstanding the overall conclusion above, the appraisal identified a number of situations where certain individual policies could have a negative sustainability effect upon individual criteria within the SA objectives. Suggestions for mitigation measures were made within the appraisal matrices and are summarised within Table 2.4 below.

**Table 2.4 SA Report of Submission DPD; Suggested Recommendations for Mitigation or Enhancement**

Policy	Recommendation
<b>Core Strategy</b>	
Policy CP8	Policy should include reference to Travel Planning.
CP2/CP6	Plan should confirm the order of land release focussing upon brownfield first
CP1	Policy would benefit from direct reference to biodiversity as a key element of sustainable development.
CP6	Could be strengthened by making explicit reference to existing urban character and historic environment.
Relevant CP Policies	Should consider reference to Chelmsford LBAP species.

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CP14	Could reference historic landscape.
CP13	Could make reference to tackling areas of existing poor air quality and tackling noise pollution.
CP20	Should include reference to habitats and species.
Relevant CP Policy	Suggest inclusion of a reference to tourism.
<b>Development Control Policy</b>	
DC9	Could be extended by reference to wider, environmental, determinants of health, including road safety.
Relevant DC policies	Could reference the importance of CSR.
DC19	Supporting text could make reference to the damage to the character of conservation areas caused by high levels of traffic. Also could include reference to development applications taking into account Historic Landscape Character.
DC27	Policy could be clarified, particularly with regard to the council's expectation for SUDs. Policy should state that SUDS will be a requirement of development, unless it can be demonstrated otherwise. Policy also seeks to encourage water efficiency, this should be made a requirement.
DC32	Should include criteria that allows for the applicant to demonstrate to the LPA's satisfaction that vacant housing to be re-used for other uses, particularly if there is a need for such uses.
DC38	Could include reference to Design and Access Statements.
DC39	Policy could allow for change of use from one community use to another.
DC46	Could include reference for site planning to include consideration of environmental constraints and opportunities such as passive solar gain.

The above recommendations concentrated upon suggested minor changes to a policy document that was already considered to be sustainable. Implementation of the recommendations does not change the significance assessment of the chosen spatial option or individual policies. The recommendations were considered by the Borough Council and made available to the wider consultee network and Inspector prior to the Examination. Subsequent revisions made to the DPD include reference to Design and Access Statements under Policy DC38, as recommended within the SA Report.

The Inspector has considered the SA Report alongside the Submission DPD and has made recommendations for amendments to a number of Core Policies and Development Control Policies following the Examination. The Borough Council has amended the DPD accordingly.

### 2.6.1 Consultation

The SA Report for the Submission DPD recorded the responses received during consultation on the SA Report of the Preferred Options. In addition it provided a response to each representation. A summary of responses and the actions taken is provided within Table 2.5 below. This again demonstrates that the SA process and therefore the plan making process was informed by consultation responses.

**Table 2.5 Consultation comments on SA Report and Responses**

<b>Comments</b>	<b>Response</b>
<b>Specific Consultation Bodies</b>	
<b>Environment Agency</b>	
'In making response the EA have reviewed the SA Report, which we found to be comprehensive in its scope and coverage'.	No action
<b>English Heritage</b>	
No response	No action
<b>English Nature</b>	
Sustainability Baseline conditions for SA Objective 3 should be more detailed and quantitative. BAP priority species and habitats should be listed.	A fuller assessment upon the impacts of the DPD on designated sites will be undertaken through a Habitats Regulations Assessment.
<b>Countryside Agency</b>	
'The sustainability appraisal is a thorough and helpful document'.	No action
<b>Go-East</b>	
Has the SA assessed all options identified within paragraph 15.1 of the Preferred Option document	SA has been undertaken throughout the optioneering process.
<b>Essex County Council - Education</b>	
No comment relative to SA	No action
<b>Essex County Council</b>	
Temple Farm and Essex Regiment Way have failed to be included within SA.	SA considered the overall spatial options, site allocations will be the subject of a separate DPD that will undergo SA.
<b>Braintree District Council</b>	
No response on SA	No action.
<b>Boreham Parish Council</b>	
'Agree that SA provides appropriate assessment of policies'.	No action.

**Table 4.1 Consultation comments on SA Report and Responses**

<b>Comments</b>	<b>Response</b>
<b>Broomfield Parish Council</b>	
Options do not meet required SA criteria. Development will impact upon water infrastructure and landscape and environment. The need for health, education and transport infrastructure has been highlighted	SA considered all options and found that all would require significant infrastructure enhancement and that development would have to be undertaken in a way that maximised water efficiency.
<b>Great Waltham Parish Council</b>	
'The PC is neutral to whether the SA provides an appropriate assessment'..	No action

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**Little Baddow Parish Council**

The PC strongly agree that the SA provides an appropriate assessment.' No action

**Sandon Parish Council**

'The PC agrees that the SA provides an appropriate assessment'. No action

**South Woodham Ferrers Town Council**

No specific reference to the SA No action

**Anglian Water Services**

'Agree that the SA provides an appropriate assessment of the policies and proposals.' No action.

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**General Consultation Bodies**
**Mrs Christine Barrett, Chelmsford Area Access Group, 24 Manor Road Chelmsford CM2 0EP**

The SA does not provide an appropriate assessment of proposals and policies. It is difficult for general public to understand what it means. No action

**Mr Michael McDonagh, Chelmsford Business Forum High Chelmer Shopping Centre, 15a Exchange Way Chelmsford CM1 1XB**

Neutral on whether SA provides an appropriate assessment of proposals and policies. On-going consultation with bodies such as Chelmsford Environmental Partnership and the Business Forum is envisaged

**Mr Terry Burgess, Business Link fro Essex, Alexandra House 36a Chruch Street, Great Baddow, Chemlmsford, CM2 7HY**

Agree that the SA provides appropriate assessment of proposals and policies. No action

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**Other Consultees**
**Dr Peter Foreman, CPRE (Essex (Transport) 10 Fraser Close Chelmsford, Essex, CM2 0TD**

Neutral- that SA provides an appropriate assessment of proposals and policies. There is a need for an option that performs well against resource efficiency and waste. Choice of options is set by CBC

**Mr John Gilliver, Bakers Lane Action Group, 44 Templeton Park, Bakers Lane West, Hanningfield, CM2 8LF**

The SA does provide an appropriate assessment of the proposals and policies of the Core Strategy document No action

**Mrs EJ Burgess Chelmer Valley Association Mulberries Church Road, Boreham, Chelmsford, CM3 3DS**

Strongly disagree that the SA provides an appropriate assessment. More clarification needed to identify if the SA is meant to back up the proposals and policies in the Core Strategy or help to form them. The SA is a neutral document that seeks to identify the sustainability performance of the options and policies developed by CBC. The SA process is iterative and its recommendations should be considered by CBC.

**Mr Drake, Campaign to Protect Rural Essex, 79 Springfield Road, Chelmsford, Essex, CM2 6JG**

The non-technical summary of the SA states that more people commute out of Borough than commute in. The consultation document contradicts this stating that 17% of the resident workforce commute into London with 27% of workforce commuting into Borough. Figures released by Cambridge County Council Research Group on behalf of East of England in October 2005 states that net commuting from the 'rest of Essex', (Chelmsford, Maldon and Brentwood) was 14,200 in 2004, a rise of 900 from 2001, i.e. more commute out than in.

**Mr Ian Andrewartha, Essex Wildlife Trust/Chelmsford, Group 6 Kay Close Great Leighs, Chelmsford, Essex, CM3 1RU**


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Neutral that SA provides an appropriate assessment of proposals and policies	No action
<b>Mr Nicolas Cook, Wollastons Solicitors Briefly Place, New London Road, Chelmsford, Essex, CM2 0AP</b>	
Agree that SA provides appropriate assessment of proposals and policies.	No Action
<b>Mr Phil Sturges, Essex Wildlife Trust, Abbots Hall Farm, Great Wigborough, Colchester, Essex, CO5 7RZ</b>	
Neutral- that SA provides appropriate assessment of proposals and policies.	No Action
<b>Mr CE Brown, Chairman Danbury Society, 116 Maldon Road, Danbury, Chelmsford, CM3 4RA</b>	
Neutral towards whether the SA provides an appropriate assessment of proposals and policies	No Action
<b>Mr Keith Smith, Chelmsford Community Transport Ltd., The Gatehouse, 116 Rainsford Road, Chelmsford, CM1 2QL</b>	
Neutral on whether the SA provides an appropriate assessment of proposals and policies	No action
<b>Mr Andrew Hull, Moat Housing Group, The Square, Holloway Road, Heybridge, Maldon, Essex, CM9 4LH</b>	
Agree that the SA provides appropriate assessment of proposals and policies	No Action
<b>Mr Peter Black, Sandylands Home Farm, Wick Road, Englefield, Green Survey, TW20 0HJ</b>	
Agree that the SA provides appropriate assessment of proposals and policies. However there is a problem with the railway stations, which are situated in a location which will mean large lorries will have to travel through the town centre and residential areas.	No action, response makes a factual point.
<b>Mr Stephen Robinson, Liberal Democrats, 14 Paradise Road, Writtle, Chelmsford, CM1</b>	
SA of no benefit. Not enough substance on each option. Sentence against option 1 is misleading, rather than 'strengthen existing services' there will be an overload.	SA provides an assessment of the performance of each option. It is not the role to recommend one option over another. Recognition of the need to ensure that sufficient infrastructure is provided to support significant new development is made.
The third sentence outlines major improvements in facilities for the Springfield area, the danger is that might not benefit the whole parish	
Comments on Option 3 demonstrate that this option fails to meet sustainability objectives..	
<b>Mrs E Andrews, NAI Fuller Peiser (on behalf of Writtle College) Whittington House 19-30 Alfred Place London, WC 1E 7EA</b>	
Neutral on whether the SA provides an appropriate assessment of proposals and policies	No action
<b>Mr A Nash (Bakers Lane Action Group) 198 Templegrove Park, Bakers Lane West, Hanningfield, Essex, CM2 8LW</b>	
Neutral on whether the SA provides an appropriate assessment of proposals and policies	No action
<b>Mr John Leslie, West Chelmsford Constituency, Labour Party, 15 St Mildreds Street Road, Chelmsford, CM2 9PU</b>	
Strongly disagree that SA provides an appropriate assessment of proposals and policies.	No action
<b>Mrs Julie Norris, The Guinness Trust, Greenwood House, 91-99 New London Road, Chelmsford, Essex, CM2 0PP</b>	
Agree that the SA provides an appropriate assessment of	No action

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policies and proposals

**Dr Michael Bailey, The Writtle Surgery, 16a Lordship Road, Writtle, Chelmsford, Essex, CM1 3EH**

Neutral on whether the SA provides an appropriate assessment of proposals and policies                      No action

**Mrs Mary Armson, West Hanningfield VDS Committee Cherdel, Church Road, West Hanningfield, Essex, CM2 8UJ**

Strongly agree that the SA provides an appropriate assessment of policies and proposals                      No action

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## 2.7 Conclusion

This section has sought to demonstrate the extent to which environmental considerations, as expressed within the SA process were accommodated within the Core Strategy and Development Control Policies DPD. In addition it summarises the optioneering process that was undertaken to arrive at a Preferred Option which was considered to be the most appropriate, in terms of sustainability. Consultation on the SA process was undertaken throughout the course of the assessment and responses received were considered and acted upon where it was considered to be appropriate. In particular, the responses from the statutory consultees were helpful in refining the scope of the assessment process and ensuring that environmental consideration were to the fore. Monitoring is an essential part of the process to ensure that the assumptions made within the process are met and that action is taken to address any areas of under-performance. The monitoring framework is therefore included within the following section.



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## 3. Monitoring

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### 3.1 Introduction

The SA Directive requires LPA's to monitor the impact of their plans and programmes on the environment. In line with this requirement, this section sets out the proposed monitoring procedure to be followed by CBC in assessing the impacts of the Core Strategy and Development Control Policy DPD.

**Box 3.1 What the SA Directive Says:**

*“Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action” (Article 10.1).*

*The Environmental Report shall include “a description of the measures envisaged concerning monitoring” (Annex I (i)).*

Many existing indicators are likely to be suitable for the purpose of the SA/SEA. Indeed, Article 10(2) of the SEA Directive specifically states that existing monitoring arrangements may be used if appropriate, with a view to avoiding duplication of monitoring.

### 3.2 CBC Indicators and Targets

Table 3.1 outlines the SA objectives and key indicators and provides a policy rationale to which each of these indicators relates. Policies are identified at the national, regional and local level using the following documents as a source:

- Quality of Life Indicators and other documents;
- Regional Spatial Strategy (RSS14) for the East of England (December 2004) and other regional documents;
- Essex and Southend-on-Sea Replacement County Structure Plan and other county documents;
- Chelmsford Borough Council Community Strategy and other CBC documents.

The UK Sustainable Development Strategy<sup>3</sup> also contains a list of 68 indicators taken mainly from existing UK Government Indicators, (Public Service Agreements). They tend to replicate those indicators identified within the table, although the emphasis within the table is toward regional, county or local targets.

**Table 3.1 Monitoring Indicators**

SA Objective	Indicator	Target	Rationale
Objective 1: To achieve more sustainable levels of prosperity and growth	Number of VAT registrations, rural and urban	Up to 35 per 10,000 residents in 20% most deprived wards	Local Quality of Life Counts (DETR 2000)  East of England AMR
	Employment levels/ unemployment	Reduce Unemployment	East of England Plan
	Business (B1-B8) floorspace completions, permissions and allocations in Urban (over 25,000 population and rural areas (inc. pdl)	Contextual	East of England Plan CBC SA Criteria
	Net changes in land developed for business (B1-B8), by type which is in an LDF defined development or regeneration area.	Contextual	PPG4: Industrial, Commercial and small firms. East of England Plan  CBC SA Criteria
	Knowledge based and employment cluster development completions and allocations. Number of jobs in knowledge based industries	Increase	East of England Plan
	GCSE and A Level passes and % of pupils in further education. % resident population with NVQ (equivalent) qualifications and % of students in HE.	Contextual	East of England Plan and SD framework for the East of England Quality of Life Counts
	Broadband coverage of Chelmsford	Contextual	East of England Plan

<sup>3</sup> Securing the Future Delivering UK Sustainable Development Strategy: The UK Government Sustainable Development Strategy (2005)

Objective 2: To deliver more sustainable patterns of development	Percentage of new employment developments built on pdl and / or the reuse of existing buildings	60%	East of England Plan
	Percentage of new homes built on pdl and/or reuse of existing buildings	60%	SD framework for East of England and RSS14
	Vacant land and properties on derelict land	UK Vacant dwelling target at 3%	Quality of Life Counts
	Percentage of households within 400m of quarterly bus service or 800m of existing or proposed rail station	90% of households	East of England Plan
	Introduction of passenger information systems, park and ride	Introduce three Park and Ride Schemes	Chelmsford Transport Strategy
	Percentage of households in rural areas within 13 minute walk of hourly bus service	East of England Figure yet to be added into East of England Plan	East of England Plan
	Mode of transport (% of car, bus, rail and other transport use).	Increase public transport patronage by 12% by 2010	Regional Social Strategy
		Increase proportion of journey's taken by modes other than car from 29% in 1998 to 35% by 2020	East of England Plan
	Number of car journeys into Chelmsford Urban Area (average annual daily flows)	Stabilise traffic levels to 1999 levels	East of England Plan
	Percentage of new dwellings meeting CBC accessibility standards to open space	All new residential development to meet standards	Chelmsford Open Space Assessment
Increased patronage of public leisure and cultural facilities	Increasing Cultural activity and volunteer time by 5% by	Regional Cultural Strategy	

2010			
	Number of planning permissions granted contrary to advice of Environment Agency on flood defence grounds.	Reduce	East of England Plan, AMR
Objective 3: To protect and maintain our most vulnerable assets such as designated habitats, landscapes of natural beauty and our historic heritage and to improve the wider environment by adequate investment and management	Percentage of main rivers and canals as good or fair quality	Increase	Audit Commission Voluntary Quality of Life Indicators
	Biological quality of rivers	Improve	Biodiversity Strategy for England
	Number and size of Ramsar, SPA, SAC, NNR and SSSI sites	Contextual	East of England Plan. National Core Indicator
	Percentage of SSSI achieving favourable status	95%	Biodiversity Strategy for England
	Number and size of local wildlife sites	Increase	Chelmsford Biodiversity Strategy
	Population of wild birds	Increase	SD Framework for East of England
	Area of Heathland increased	Contextual	Chelmsford BAP
	Increase in area of new woodland	Contextual	Regional Woodland Strategy, RSS14
	Area of standing water increased	Contextual	Chelmsford BAP
	Percentage of LNR sites declared above English Nature minimum standards	Contextual	Chelmsford BAP
Number of listed buildings at risk	Decrease number at risk	SD Framework for the East of England  RSS14	
The percentage of Conservation Areas with appraisals	Increase	Chelmsford BC	

	Number of days per year any air quality parameters exceed national standards	Contextual	SD framework for East of England
	Amount of development on important habitats/ landscapes identified in BAP	Reduce	Chelmsford BAP
Objective 4: To reduce greenhouse gas emissions	Reduce CO2 emissions to 12.5% below 1990 levels	To 20% below 1990 levels by 2010	UK Sustainable Development Strategy
	Percentage of energy generated from renewable resources	10% by 2010, 17% by 2020	East of England Plan and Climate Changes Strategy 2004- 2007  UK Sustainable Development Strategy
Objective 5: To achieve a more equitable share of benefits of prosperity across all sectors of society and fairer access to services, focussing on deprived areas	Increase in affordable housing	150 dwellings per annum	Regional Spatial Strategy and Chelmsford Housing Strategy
	Indices of deprivation – barriers to housing (house price/earnings – affordability ratio)	Reduce disparity	Voluntary Quality of Life Indicators
	Indices of deprivation – income disparities	Reduce disparity	DETR Indices of Deprivation
	Sites and size of all public open space	Contextual	
	Loss of open space of open space, sports fields to development	Contextual	East of England Plan
	Number of Social Enterprises, Credit unions	Increase	ODPM SA Guidance
	Annual completion rate for housing and for affordable housing	Contextual	ODPM SA Guidance
	Increase in participation in sport	1% year on year	Regional Sports Strategy
	Local Services: dentists, doctors, schools and leisure	Contextual	DETR Indices of Deprivation
	Reduction in the fear of crime	Reduction, Social Strategy sets targets	Regional Social Strategy. Quality of Life Counts
		For increase in numbers to cultural facilities see objective 2.	
	Indices of deprivation – percentage of the population in good health	Increase	DETR Indices of Deprivation
Objective 6: To use natural resources both finite and renewable as efficiently as possible and re-use finite or	Number of dwellings created by re-using existing buildings	Contextual	SD framework for East of England
	Reduction in energy consumption	Reduce energy consumption	Climate Change Strategy 2004-2007

recycled alternatives wherever possible	Production of primary land won aggregates by mineral planning authority (NB CBC is not a MPA)	Contextual	East of England Plan
	Number of BREEAM buildings	Increase	
	Reduction in water used	Reduce water demand	Climate Change Strategy 2004-2007  UK Sustainable Development Strategy
Objective 7: To minimise our production of by-products or wastes aiming for closed systems where possible	Total amount of waste collected per household	Reduce	East of England Plan
	Percentage of household and commercial waste that is recycled	Household: 40% at 2005, 50% at 2010, 70% at 2015. Commercial 66% at 2005, 75% at 2015  25% household reduction	East of England Plan and Regional Waste and Minerals Strategy  UK Sustainable Development Strategy
	Increased number of recycling facilities	No target	National Core Indicator
Objective 8: To revitalise town centres to promote a return to sustainable urban living	Total amount of vacant and derelict land and town centres	Reduction	
	Number of noise complaints received	Reduction	
	Percentage and absolute amount of retail floorspace by type	Contextual	East of England Plan AMR
	Proportion of population living in town centres	Increase	SD Framework for East of England
	Townscape enhancement	Contextual	East of England Plan
	Community Wellbeing	Increase	Quality of Life Counts

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### 3.3 Documenting the Monitored Data

The table below sets out the format for documenting how the monitoring process should be managed.

**Table 3.2 Management of the Monitoring Process**

What needs to be monitored	Indicator	Source of Information	Are there any Gaps in Existing Information and How can These be Resolved?	When should Remedial Action be Taken?	What Remedial Action could be Taken?
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## 4. Conclusion

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This statement has been prepared to demonstrate the extent to which Chelmsford Borough Council has complied with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (16) (3) and (4). In conclusion, the requirements have been met in the following ways:

1. How environmental considerations have been integrated into the plan or programme;

Through the identification of SA Objectives which were then used to appraise the performance of the Plan, throughout the plan making process. In addition, through the identification of geographic areas most likely to sustain significant environmental effects, and the identification of mitigation and the adoption of this mitigation within the DPD.

2. How the environmental report has been taken into account;

Through the preparation of recommendations at each stage of the assessment process and the amendments thereby made to the DPD at Preferred Options and Submission stage.

3. How opinions expressed and results of public consultation have been taken into account;

Consultation was undertaken at the appropriately prescribed stages (Regulation 25, 26 and at Submission) Responses received by consultees were considered and taken into account with regard to the setting of both SA and Plan Objectives; the consideration of options and the selection of the final, Preferred Option. In addition there was consultation support for the Preferred Option such that it was maintained for Submission.

4. The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with;

The identification and review of options, (alternatives) formed a critical element in the process leading to the choice of a Preferred Spatial Option. Each option was considered against sustainability (including environmental) objectives and those which were considered to offer fewer opportunities to deliver positive benefits, or where a greater number of significant impacts were identified, were discounted. The chosen, Preferred Option is considered to provide the greatest opportunity to concentrate development within the urban area, thereby supporting existing service and facilities and improving accessibility and job creation. Expansion of the urban area to the north of the town provides the ability to introduce new facilities which are presently lacking and, due to the size of development proposed, internalise a significant proportion of trips thereby reducing vehicle movements and protecting environmental consideration such as air quality.

5. The measures that are taken to monitor the significant environmental effects of the implementation of the plan or programme.

A number of indicators have been identified and consulted upon throughout the SA process. These indicators will be monitored to establish the success of the Plan.

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# Appendix A Responses to Scoping Consultees

3 Pages

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The scoping report was issued for consultation to the four SEA statutory bodies and other key consultees. Key questions requesting comments were included throughout the report. They are listed below:

1. Are there additional plans and policies beyond those included that you think are relevant to this appraisal?
2. Do you think that the sustainability objectives and key questions are appropriate?
3. Do the objectives cover all the areas of interest, without repeating each other?
4. Do you or you organisations have information that you feel would provide better information for the objectives and indicators included?
5. Do you think that the matrix presented provides a useful framework for assessment?

Table D1 lists the recommendations and comments received from three of the statutory consultees that responded.

**Table D1 Recommendations for the SA Received from Statutory Consultees and Action Taken**

Comments	Response
<b>Environment Agency</b>	
Objective 3, Criteria c) should be changed to "Will it help to protect <i>and enhance</i> biodiversity...."	This amendment has been made to the objective.
SA Objectives are not fully reflected in the LDF Plan Objectives – no reference to water efficient or flood risk issues.	The plan objectives do not necessarily need to cover all the SA Objectives, they must however not work in opposition to the SA objectives.
Could include reference to minimising flood risks.	This aspect of baseline information has been addressed where possible.
There should be a recommendation to protect and enhance biodiversity generally	This aspect of baseline information has been addressed where possible.
The Borough Council is better placed to hold household waste levels and recycling rates.	This aspect of baseline information has been addressed where possible.
Reference needs to be made to the Essex and Southend Waste Local Plan, adopted 2001.	This plan has been added to Appendix B and table 2.1.
The Environment Agency collects river data which could be used as baseline information. Additional information may also be collected from the Agency's site 'What's in your backyard'.	Where possible this information has been collected and added into the baseline.
<b>English Heritage</b>	
Refer to challenges to historic and built environment.	This has been included.
Suggest extra plan objective: "To protect and enhance the historic environment and local distinctiveness".	Plan objectives are drafted by CBC.
First plan objective should be amended to "...urban fabric, high standards of urban design and promotes sustainable urban living".	This plan objective does not work in opposition to the SA objectives, and consequently has not been changed.

**Table D1 (continued) Recommendations for the SA Received from Statutory Consultees and Action Taken**

<b>Comments</b>	<b>Response</b>
Approach set out in paragraph 13 of PPS1 should be adopted.	The SA objectives include those addressing the protection and enhancement of historical buildings, and are therefore included within the analysis of plan objectives.
This section should address the issue of design. How low density housing does not support sustainable lifestyles.	The issue of design has been included within the sustainability issues identified.
The baseline information on landscape should refer to the Historic Landscape Characterisation database, and the importance of understanding the evolution of the present landscape.	These aspects have been included, where possible, within the baseline information within technical papers.
Positive issues relating to increased residential and mixed use in town centres are not reflected.	These aspects have been included, where possible, within the baseline section.
Conclusions need to adequately reflect the importance of the Borough's heritage, or the present issues relating to this resource.	These aspects have been included, where possible, within the report.
EERA is conducting a review of the Regional Environmental Strategy – these indicators should be reviewed for inclusion.	This has been included within Plans and Programmes table within Technical Report
Options to be informed by the need to create high quality urban environments and to protect green space, archaeology and the built heritage.	Options developed by CBC, strategy objectives do refer to these issues, although archaeology and built heritage not specifically mentioned.
UK Sustainability Development Strategy need to be updated to reflect changes published in February 2005.	This has been included in technical papers accompanying SA Report.
PPG1 has been cancelled	This has been included within technical papers.
PPS1 should reference historic environment.	This has been included within technical papers .
PPS6 needs to be added.	This has been included within technical papers.
PPG 15 & 16 needs to highlight enhancement as well as protection.	This has been included within technical papers.
Regional Environmental Strategy – highlights issues/problems on page 17 and 20/21 are relevant to assessment of the baseline.	This has been included in technical papers accompanying SA Report
Inclusion of baseline information as in Essex Design Manual	This baseline information has been included where relevant.
Information may be collected on sites at risk. Suggested regional comparators are more relevant than national.	This baseline information has been included where relevant.
Historic Landscape Character carried out by Essex County Council.	CBC have commissioned a historic character assessment. Findings will be reported.
<b>Countryside Agency</b>	
Criterion 3(e)"Does it respect and protect existing landscape designation...." In table D3 the same criterion is worded "Does it respect and protect existing landscape character...." – the latter wording is preferred.	The latter wording of criterion 3(e) has now been included throughout.
Criterion 2(i) should be modified to read "...and improve access to existing facilities <i>and the wider countryside</i> including opportunities for people to come into contact with...."	Criterion 2(i) has been modified to express these changes.

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**Table D1 (continued) Recommendations for the SA Received from Statutory Consultees and Action Taken**

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<b>Comments</b>	<b>Response</b>
The County level assessment – Essex Landscape Character Assessment, 2003 could provide a finer level of analysis than the Agency's regional report.	It has not been possible to obtain this data.
PPS 7 should be revised.	This has been included within technical papers .
<b>English Nature</b>	
Roach and Crouch Flood Management Strategy is fundamental to delivery of sustainable flood management	Document to be added to baseline when published
Planning decisions should take account of nature conservation interest.	Adequately covered within recommendations
Biodiversity is a key test of sustainable development.	Documents referred to as guidance to be taken into account when considering applications and the design of sustainable communities.
See Biodiversity by Design and 'Designing sustainable communities for people and biodiversity.	
Some brownfield sites have high biodiversity value	Recognised within appraisals.
Sustainable construction and design should reduce need for new infrastructure.	Recommendations for SUDs etc made in appraisals

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