

Strategic Environmental Assessment (SEA) for the Chesham Neighbourhood Plan

Environmental Report

September 2023

Quality information

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Non-technical summary

Background

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Chesham Neighbourhood Plan (CNP), which is being prepared by Chesham Town Council and will cover the entirety of Chesham.

The Neighbourhood Plan is being prepared in the context of the emerging Buckinghamshire Local Plan, which is expected to run to ~2040. It is anticipated that the Local Plan will be adopted in 2025 or 2026, at which point it will supersede the current Local Plan for the area (the former Chiltern District Local Plan).

Once 'made' the Neighbourhood Plan will have material weight when deciding on planning applications, alongside the adopted Local Plan.

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising negative effects and maximising positive effects.

Central to the SEA process is publication of an Environmental Report alongside the draft plan that presents certain information in order to inform the consultation.

Preparing the Environmental Report essentially involves answering three questions:

1) What has plan-making / SEA involved **up to this point?**

- including in relation to 'reasonable alternatives'.

2) What are the SEA findings **at this stage?**

- i.e. in relation to the draft plan.

3) What happens **next**

This Environmental Report / NTS

This is the Non-Technical Summary (NTS) of the Environmental Report published for consultation alongside the draft ('pre-submission') Chesham Neighbourhood Plan.

It is structured so as to answer the three questions introduced above in turn. Firstly, there is a need to set the scene by answering: *What's the scope of the SEA?*

What is the scope of the SEA?

The scope of the SEA is reflected in a list of topics and objectives, which, taken together indicate the parameters of the SEA and provide a methodological 'framework' for assessment. The following topics form the core of the framework:

- Accessibility (to community infrastructure)
- Air quality and wider pollution
- Biodiversity and geodiversity
- Climate change adaptation
- Climate change mitigation

- Communities, health and wellbeing
- Economy and employment
- Historic environment and cultural heritage
- Housing and homes
- Landscape
- Land, soil, and natural resources
- Transportation
- Water

Plan making/SEA up to this point

A key element of the SEA process involves assessing **reasonable alternatives** in time to inform development of the draft plan, and then publishing assessment findings in the Environmental Report, in order to inform the draft plan consultation.

As such, Part 1 of this report explains how work was undertaken to explore a 'reasonable' range of alternative approaches to addressing the matter at the very core of the neighbourhood plan. Specifically, the decision was taken to explore reasonable alternatives in respect of the planning for new homes and employment floorspace. The decision was made to refer to these as '**growth scenarios**'.

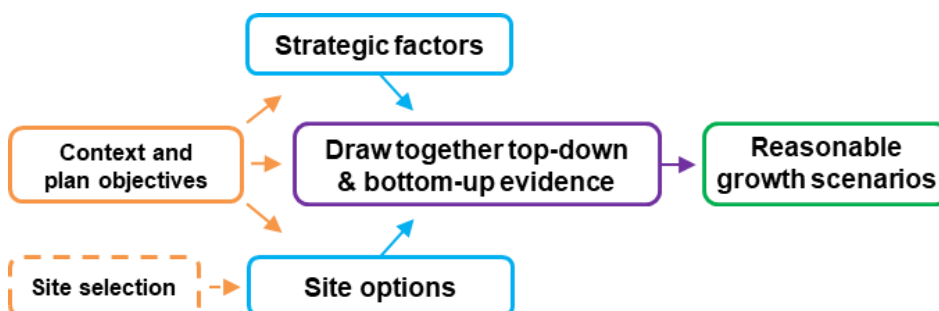
Part 1 of the report explains a story over time, as follows:

- Defining growth scenarios
- Assessing growth scenarios
- Selecting a preferred approach

Defining growth scenarios

The process of defining growth scenarios is summarised in a flow diagram.

A process to define growth scenarios



Firstly, with regards to the **context**, a key point to note is that an initial consultation was held in March-April 2022. It is reported [here](#) and discussed further below.

With regards to **strategic factors**, a key aim of the CNP is to deliver new homes within the urban area, in order to reduce the pressure for greenfield expansion. A 500 home urban extension was proposed by the draft Chiltern and South Bucks Local Plan several years ago, and whilst that plan is no longer being progressed, greenfield land around the town is being [promoted](#) for development through the Buckinghamshire Local Plan, which is in the early stages of preparation.

All greenfield land surrounding the town falls within the London Green Belt, and the majority (all bar land to the east) falls within the Chilterns Area of Outstanding Natural Beauty (AONB). As such, there would be a need to demonstrate 'exceptional circumstances' before releasing land for development through the Local Plan. However, the potential for exceptional circumstances exists due to a clear need for housing growth at Chesham, as one Buckinghamshire's largest towns.

In short, a key aim of the CNP is to reduce the need for greenfield development. However, there are also wider highly significant reasons for supporting redevelopment of brownfield / previously developed land (PDL) within the town.

Foremost amongst these is the broad aim of regeneration and revitalisation, with the need for this well-established, and many issues / opportunities already having been explored, including through the [Chesham Masterplan](#) and [Regeneration Strategy](#).

In practice, a key regeneration opportunity is around redeveloping older industrial and storage sites that are closely integrated with residential areas. There are clear sensitivities around doing so, including mindful of designation for employment use within the adopted Chiltern Local Plan (1997; see Policy Map [here](#)), but there are also clear opportunities. Perhaps most notably, opportunities are around:

- Reducing problematic HGV traffic and other amenity ('bad neighbour') issues. A strategic goal is to concentrate industry at the edge of the town on the A416.
- Replacing older industrial sites with mixed-use schemes (i.e. housing and employment) to include modern commercial and business uses, including business space suited to supporting a growing creative industries sector.
- Supporting population growth locally in proximity to the town centre and train station, with a view to supporting the achievement of transport and climate change mitigation / decarbonisation objectives and supporting / boosting the town centre. Similarly, mixed use redevelopment could support or encourage development of new local shops, services and facilities in the town's suburban areas to give those communities options to walk or cycle rather than having to rely on their cars.

The other key regeneration opportunity is around development of town centre car parks, which again is a strategy associated with clear opportunity but also sensitivity / challenge. The broad aim is to reconfigure rather than reduce town centre parking options, which largely translates as a strategy involving multistorey car parks in place of ground level parking that represents a poor use of land in highly accessible locations. However, reconfiguring car parking options is a contentious issue locally, as understood from March-April 2022 initial consultation (reported [here](#)).

In light of the above discussion there is a clear case for supporting *some* redevelopment of industrial and/or car park land. The key questions are: which sites; and how much in total / how many new homes can be assumed?

With regards to **site options**, a site selection process has been led by the town council, supported by a consultant team, and a separate Site Assessment report is available as part of the current consultation. It is not a defined aim of the SEA process to assess site options; however, naturally it is the case that site options are explored, in a proportionate way, as part of work to define RA growth scenarios.

The Site Assessment Report explains that an initial long list of site options was reduced to a shortlist of 27, and then the decision was taken to focus attention on a refined shortlist. In short, these sites are identified taking into account: issues (e.g.

amenity, prominence); and complexity (notably multiple land ownership and inter-dependencies with other sites, such that there is a need for 'intervention' to overcome barriers to bringing forward planning applications and ultimately redevelopment). The sites were also identified mindful of clustering, given that clusters of sites can deliver a cumulative benefit for a local area, and because a clusters can lend itself to a Neighbourhood Development Order (NDO; see below).

With regards to the non-shortlisted sites, these are by no means ruled out as unsuitable for development (or otherwise not deliverable / developable), but there is pragmatic need to focus time and resources on developing policy, and identifying capacity/yield, for select key sites. A notable cluster of sites at Waterside was initially shortlisted, but then removed from the shortlist late in the process. The non-shortlisted sites have the potential to come forward as 'windfall'.¹

Returning to the shortlisted sites, a key task was to differentiate between: **A)** those where the emerging preferred approach is relatively clear cut; versus **B)** those where the decision to allocate (and/or the decision to allocate for a specific proposed use) is more marginal. The following sites were identified as more marginal:

- Howard Industrial Estate and Albany Yard & Central Garage – stand-out as having the highest current employment density, such that there is a case for supporting a reduced emphasis on new homes or a continuation of the current use.
- Higham Mead – existing employment density is lower, but this is a key site given its size and location. There is potential for a relatively high-density scheme.
- Water Meadow Car Park – of the four car park allocation options this site stands out as warranting detailed scrutiny given a location more peripheral to the town centre and given constraints, particularly around flood risk and heritage.

The **final stage in the process** (see Figure A) then involved bringing together 'top-down' understanding (strategic factors) and bottom-up understanding (site options) in order to arrive at a set of RA growth scenarios for appraisal and consultation.

Ultimately **four RA growth scenarios** were defined for appraisal:

- 1) Low growth (501 homes) via non-allocation of all four 'marginal' sites.
- 2) Scenario 1 plus allocation of Waterside Meadow Car Park
- 3) Scenario 1 plus allocation of the other three 'marginal sites'.
- 4) Higher growth (848 homes) via allocation of all shortlisted sites.

N.B. the scenarios reflect an assumption that the key choice at each of the four 'marginal' sites is whether or not to allocate the site. However, in practice there could also be a choice regarding the nature of the scheme supported.

¹ Windfall sites are those that can be anticipated to deliver new homes (and or other uses, e.g. commercial or employment floorspace) in the plan period despite not being allocated within a local or neighbourhood plan. By definition, what will be yielded from windfall sites cannot be predicted with any certainty, and so there is a need to make a conservative estimate, as part of the process of establishing a supply of new homes (and/or other uses) to meet needs (etc.) through a local or neighbourhood plan.

What is an NDO and what is the proposal for Chesham?

A Neighbourhood Development Order (NDO) is the equivalent of an outline planning permission, such that all that remains is to apply for, and receive, 'reserved matters' planning permission before development can occur. Whilst outline planning applications are typically made by landowners / developers, NDOs are prepared by designated neighbourhood groups (such as Chesham TC) under the Localism Act (2011). This is in addition to, or instead of, a neighbourhood plan.

An NDO is essentially a step further than a neighbourhood plan allocation. All sites in Chesham covered by an NDO will also be an allocation in the CNP, but if they were an allocation alone then confidence in their ability to deliver homes within the plan period (and in the anticipated timeframe) would be lower. This is because all the sites in question are complex and, in turn, involve financial risk.

An NDO aims to de-risk the process of bringing a site forward for development, and so encourage landowners to act. The upshot will be that the independent examiner tasked with eventually examining the CNP will be confident in the CNP housing supply trajectory, mindful that punitive measures are in place where a local authority (in this case Buckinghamshire Council) commits to a supply trajectory only for delivery to fall short of what is committed in practice. In this way NDOs are a key means of enabling a strongly 'brownfield-first' housing strategy.

Because of equivalence to an outline permission, preparing an NDO involves a considerable amount of work. The shortlisted sites might be grouped into three NDOs according to clusters or, alternatively, it may be appropriate to group all sites as a single NDO. The proposal is for the NDOs to be prepared in parallel with the CNP, and it should NDOs can require Environmental Impact Assessment (EIA).

The reasonable alternative growth scenarios (constants greyed out)

Supply component	Cluster	Growth scenarios (number of homes)			
		1	2	3	4
Windfall	N/a	115	115	115	115
Howard Industrial Estate	New Town	0	0	62	62
Alma Road Ind. Estate		62	62	62	62
Bellingdon Rd / Deanway		54	54	54	54
Cameron Rd Ind. Building		4	4	4	4
Station Car Park		75	75	75	75
Star Yard / Catlings CP	Town centre	78	78	78	78
Car Park adj. Sainsburys		37	37	37	37
Water Meadow Car Park		0	50	0	50
UK House, White Hill		21	21	21	21
Wenzels, Broad Street		20	20	20	20
Higham Mead	The Yards	0	0	135	135
Chesham Business Park		25	25	25	25
Cape House, Bellingdon Rd		10	10	10	10
Albany Yd & Central Garage		0	0	100	100
Total homes		501	551	798	848

Assessing growth scenarios

The table below presents the assessment findings. With regards to methodology:

Within each row (i.e. for each of the topics that comprise the SEA framework) the columns to the right hand firstly rank the scenarios in order of preference and then, secondly, highlight instances of a predicted significant positive (**green**), moderate or uncertain positive (**light green**), moderate or uncertain negative (**amber**) or significant negative (**red**) effect on the baseline (mindful of established objectives). Also, ' = ' is used where it is not possible to differentiate with sufficient confidence.

A further key methodological point to note is that the baseline scenario is assumed to be one whereby the Buckinghamshire Local Plan directs a proportionate level of growth to Chesham, and this could well include some greenfield development.

Growth scenarios assessment findings

Topic	Scenario 1 10 Sites 501 homes	Scenario 2 11 Sites 551 homes	Scenario 3 13 Sites 798 homes	Scenario 4 14 Sites 848 homes
Accessibility	2	2	★1	★1
Air quality	=	=	=	=
Biodiversity	=	=	=	=
Climate change adaptation	★1	2	★1	2
Climate change mitigation	=	=	=	=
Communities	2	2	★1	2
Economy	=	=	=	=
Historic env.	=	=	=	=
Homes	=	=	=	=
Land	4	3	2	★1
Landscape	4	3	2	★1
Transport	2	2	★1	2
Water	=	=	=	=

Discussion

The assessment finds **Scenario 3** to perform well in absolute and/or relative terms under a range of topic headings. Scenario 3 involves 'higher growth' without allocation of Waterside Meadow Car Park, which is a constrained site and likely to be necessary for a multi-storey carpark, rather than development for homes.

Support for a relatively high growth scenario – under specific topic headings – reflects an assumption that the baseline situation is one whereby there is considerable **greenfield expansion** of Chesham and key urban sites are not brought forward for redevelopment (or at least not in a way that is considered optimal, as understood on the basis of the work completed to date).

However, this is by no means a safe assumption, such that the assessment conclusions are uncertain. It will be for the Buckinghamshire Local Plan to determine an appropriate growth strategy for the town, accounting for urban supply and wider strategic issues/opportunities. What is certain is that the case for demonstrating the exceptional circumstances necessary to justify greenfield urban expansion of Chesham would be significantly reduced under Scenarios 3 and 4.

A final key assumption is that a high growth strategy would deliver as anticipated. However, in practice, and even with one or more NDOs, there would be significant **delivery risk**. Non delivery would mean that the benefits of redevelopment are not realised, and also the effect would be to place pressure on Buckinghamshire's housing land supply position (i.e. ability to pass the Housing Delivery Test and maintain a five-year housing land supply). In turn, this would increase the risk of the County being subject to the presumption in favour of Sustainable Development (NPPF paragraph 11) which, in turn, would lead to a risk of development coming forward in a relatively unplanned way (e.g. 'planning by appeal').

Having made these opening remarks, the following bullets consider topics in turn:

- **Accessibility** – a key aim is to ensure population growth in proximity to the town centre, and numerous of the shortlisted urban site options would deliver new community infrastructure, including certain of the 'marginal' sites that are a variable across the growth scenarios (not Waterside Meadow Car Park).

However, there is a need to recognise that greenfield urban expansions can deliver new *strategic* community infrastructure, e.g. a new school.

- **Air quality** – is a significant issue in Chesham, with an extensive air quality management area (AQMA) in the vicinity of the town centre. However, air quality is improving nationally due to the switch-over to electric vehicles.

There are clear transport and, in turn, air quality arguments an ambitious urban regeneration strategy (discussed below). However, focusing growth around the town centre could equally create challenges. Also, it could feasibly be the case that greenfield expansion options can be identified that deliver, or support, innovative transport solutions that are supported from air quality perspective.

- **Biodiversity** – on the one hand, there is a clear case for maximising brownfield supply and, in turn, minimising pressure on greenfield land around the urban edge, where there are clear biodiversity sensitivities, e.g. a network of linear ancient woodlands along the valleys / transport corridors that radiate out from the town. However, on the other hand, a strongly brownfield first strategy could create challenges in terms of mitigating recreational pressure on the Ashridge Common and Woods SSSI component of the Chilterns Beechwoods SAC. Greenfield development could be preferable given potential to deliver new Suitable Alternative Natural Greenspace (SANG) onsite or nearby.

A further consideration is the River Chess, which is a key sensitivity within the urban area. However, there is little reason to suggest that redevelopment in proximity gives rise to a significant concern. With regards to Water Meadow Car Park, if it is not developed for new homes (Scenarios 2 and 4) it could well be necessary to deliver a multi-storey car park here.

- **Climate change adaptation** – the key issue here is flood risk, particularly fluvial but also surface water, with the latter being a significant issue in Chesham given the topography / close association of the town with a series of steep-sided ‘dry valleys’. There is a need to acknowledge instances of land historically having been seen as appropriate for a low intensity use (industry, commerce, car parking) due to flood risk, and this is most notably the case for Water Meadows Car Park. Flood risk is set to worsen due to climate change; however, on the other hand, the practice of avoiding risk through building design (etc) is improving. It is not at all uncommon for sensitive brownfield redevelopment within areas of flood risk, typically to include non-residential on the ground floor.

- **Climate change mitigation** – is a key issue and a focus of discussion within the ‘draft plan appraisal’ section of this report. However, it is a challenge to meaningfully differentiate between the merits of the RA growth scenarios.

Transport emissions are key, and issues/opportunities are discussed below. With regards to minimising built environment emissions, on the one hand complex brownfield sites with challenging viability can result in ‘operational emissions’ opportunities missed relative to greenfield development. However, on the other hand, high density development gives rise to operational emissions opportunities and making best use of existing buildings (as opposed to demolition and re-build) is key for minimising ‘embodied’ emissions.

- **Communities** – as discussed, there is local support for avoiding greenfield urban expansion and also for addressing the issue of ‘bad neighbour’ land uses. Furthermore, the NDO process has involved in-depth work to prepare design codes for all of the shortlisted site options, and indications to date are that the design proposals are broadly well-received, e.g. with a focus on mixed use schemes and terraced homes (a feature of Chesham) in addition to flats.

There are local concerns around the reconfiguration of town centre car-parking; however, there is a good degree of confidence in the ability to avoid a net loss in car parking through delivery of new multi-storey car parks, at least under those scenarios not involving development of Water Meadow Car Park. Also, it is anticipated that the effect of the neighbourhood plan will be to support modal shift away from the private car, therefore reducing demand for car parking or, at least, avoiding an increase in demand (given an increased local population).²

However, there are uncertainties regarding the potential to deliver high urban housing growth alongside sufficient town centre car parking.

- **Economy** – under Scenarios 3 and 4 there may be a net loss of employment opportunity in the town, but this is uncertain, and in all likelihood any net loss would be small. Potentially more significant are the benefits associated with supporting a shift to higher value employment uses, including associated with the creative sector. Also, it could feasibly be the case that a clear focus on industrial and storage/logistics uses at the northern and southern extent of the town allows these areas to flourish and potentially expand.

² Emerging policy CHESH4 sets out that public car parking must be re-provided close to the town centre before it is lost.

However, it is recognised that there is a need to ensure employment opportunities suited to the skills of the local population and avoid a situation whereby lower skilled workers are unable to find local employment. It is recognised that the employment land designations within the current Chiltern Local Plan (1997), whilst very dated, were defined for a reason.

- **Historic environment** – whilst this is an important issue, it is difficult to differentiate between the scenarios with any confidence. Several of the sites in question have clear historic environment sensitivity, including Waterside Meadows Car Park, which is adjacent to Chesham Old Town and within the Chesham Conservation Area. However, sensitive redevelopment in line with a design code could lead to an improvement on the baseline situation. Other considerations are: the heritage value of industrial buildings (including early 20th Century heritage); and the need to consider secondary impacts, e.g. from increased traffic and/or problematic car parking (e.g. in the Old Town).
- **Homes** – a ‘moderate or uncertain negative effect’ is flagged across the growth scenarios to reflect certain risks with a strongly ‘brownfield first’ strategy.

Firstly, as has been discussed, under higher growth scenarios there could be a risk of the homes not delivering as anticipated, leading to issues in respect of meeting locally arising housing needs (also wider issues around delivering the committed housing land supply trajectory at the Bucks scale, although this is less of a ‘housing’ issue). For example: development of the car park sites is dependent on new multistorey car parking capacity being in place; and redevelopment of Albany Yard is dependent on a new site being found for the Elgiva Theatre. More broadly, all of the sites are associated with complexities / delivery challenges, including multiple land ownership and a need to factor in current (and potential alternative future) use values when considering development viability (e.g. Waterside Meadow Car Park may not be viable for housing given a potential alternative use as a multi-storey car park). Viability and wider deliverability concerns are greatly reduced on the basis of an assumption that NDOs would be in place; however, there are uncertainties.³ A further consideration is that delivery risk will be reduced if there is a clear and early steer from Bucks Council that the Local Plan will not support or limit greenfield expansion, but it is not known if this will be the case.

Secondly, whilst housing mix is being very carefully considered through the NDO / design code process, it is inherently the case that greenfield sites are associated with greater potential to deliver new family homes with gardens.

Thirdly, challenging development viability can, and likely would, limit the potential to affordable housing in line with established policy. In practice, this could mean that the proportion of new homes delivered as affordable is less than the policy intent and/or there is a focus on shared ownership affordable housing, rather than affordable or social rented affordable housing.

- **Land** – there is a clear case for minimising pressure on the productive agricultural land that surrounds the town. The nationally available ‘provisional’ dataset shows all land surrounding the town to be of ‘grade 3’ quality, such that it may or may not be ‘best and most versatile’, which the NPPF classes as land that is of grade 1, grade 2 or grade 3a quality. No land surrounding the town has been surveyed in detail to establish agricultural land quality.

³ There remains uncertainty regarding whether there would be a need for Environmental Impact Assessment (EIA) alongside development of the NDO(s). Undertaking EIA would require time and resources, and so could create a challenge for the NDO(s).

However, again, it is important to say that over-reliance on brownfield sites could be counter-productive, from a perspective of seeking to avoid loss of sensitive greenfield land, if the homes do not come forward as expected leading to pressure on the Buckinghamshire housing land supply position.

- **Landscape** – there is a very clear need to avoid pressure on the Chilterns AONB, and even land to the east of the town that falls outside of the AONB is associated with clear landscape sensitivity. Chesham is very strongly associated with growth along valleys that are also historic transport corridors, hence there is an inherent risk of problematic ‘sprawl’. Raised ground has clear landscape sensitivity, and along the valleys / transport corridors outside the town are valued villages, hamlets and farmsteads, at risk of coalescence.
- **Transport** – as discussed above, under Scenario 3 the aim is to:
 - Reduce problematic HGV traffic through the town, with industry and storage/ logistics instead concentrated at the edge of the town, directly on the A416.
 - Support population growth locally in proximity to the town centre and train station, supporting modal shift away from the private car and, in turn, supporting the achievement of transport and climate change mitigation / decarbonisation objectives (and supporting / boosting the town centre). Similarly, the proposal is for mixed-use developments to deliver/support new local shops, services and facilities in the town’s suburban areas to give those communities options to walk or cycle rather than having to rely on their cars.

However, there is also a need to recognise that concentrating housing growth in and around the town centre could potentially lead to certain challenges in respect of avoiding traffic congestion. Also, large urban extensions can often deliver targeted new or upgraded transport infrastructure in line with strategic objectives (e.g. in line with the emerging Bucks Local Transport Plan 5).

With regards to Scenario 4, whilst there are arguments for delivering a high quality new housing scheme at Waterside Meadow, the latest view is that the site will be needed for a multi-storey car park in support of housing growth.

- **Water** – both water supply and wastewater / water quality are significant issues locally; however, it is difficult to differentiate between the growth scenarios with any confidence. With regards to water supply, this is a larger-than-local issue, being addressed by Affinity Water’s Water Resource Management Plan (2019). With regards to wastewater / water quality, there is little reason to suggest that Scenario 4 would lead to a high growth strategy for Chesham that puts pressure on Chesham Sewage Treatment Works (located on the River Chess close to Latimer). However, there is uncertainty ahead of capacity at the treatment works (in terms of hydraulic capacity and/or capacity of the receiving water course during periods of low flow) being examined further, likely through a Water Cycle Study for Buckinghamshire. It is noted that a national [mapping resource](#) shows the treatment works to have discharged raw sewage into the Chess on two occasions in 2022, which is not necessarily indicative of a particular issue in the national context. Another issue can be the local sewer network, and this can be a particular constraint to growth within urban areas.

Water companies value early certainty on growth strategy, and can prefer a concentration of growth, from a perspective of early and effective planning for water infrastructure (treatment works and sewers), but there is no reason to suggest that Scenario 4 gives rise to a significant concern.

The preferred approach

The Town Council (via their advisory consultant team), responded to the growth scenarios assessment as follows:

*“**Scenario 3** is supported on balance, in light of the assessment. It performs well in a number of respects, although it is recognised that the assessment serves to highlight certain risks and tensions with sustainability objectives. There will be the potential to address issues / tensions and uncertainties ahead of finalising the plan for submission. In particular, there is a need to progress one or more NDOs, and it is also recognised that more work is required in respect of the Chilterns Beechwoods SAC constraint.*

Scenario 3 reflects an ambitious but realistic approach to brownfield-first regeneration within Chesham. The assumption of ~800 homes from 13 key regeneration sites and windfall in the plan period is strongly evidenced on the basis of numerous workstreams completed over a period of years.

Numerous issues and opportunities have had to be balanced. For example, Waterside Meadow is not allocated for new homes on balance, because it is better suited to delivering a multi-storey car park. Whilst maximising supply of new homes within the Chesham urban area will minimise pressure for greenfield expansion (and also help to realise wider objectives), potential tensions / concerns do exist, including around traffic generation and car parking. It is also recognised that there is a need to assume supply (of new homes) only from those sites with strong viability and deliverability credentials, given the importance of a robust committed supply.”

Assessment findings at this stage

Part 2 of this report presents an assessment of the CNP as a whole, as it stands at the current time (consultation on the pre-submission plan).

Assessment findings are presented as a series of narratives under the SEA framework. The assessment reaches the following overall conclusions:

The appraisal above predicts ‘**moderate or uncertain positive effects**’ in terms of climate change mitigation, communities and landscape objectives, and broadly **neutral effects** under other topic headings. These predicted positive effects account for the merits of the proposed broad spatial strategy taken into account alongside the Chesham Design Code and the proposed suite of development management policies. The appraisal does not predict negative effects under any of the topic headings; however, it is important to recognise that there are a range of uncertainties, risks and potential drawbacks associated with the proposed strategy. Concerns are primarily associated with a risk that the proposed homes will not be delivered as anticipated. Concerns can and likely will be reduced through further work, accounting for consultation responses received, and there is a particular need to progress one or more Neighbourhood Development Orders (NDOs).

Next steps

Consultation responses received on the pre-submission plan will be taken into account by the Town Council, who will then aim to finalise the CNP for submission to Buckinghamshire Council. Buckinghamshire Council will then run another consultation before passing consultation responses to an Independent Examiner.

1. Introduction

Background

- 1.1 AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Chesham Neighbourhood Plan (CNP).
- 1.2 The CNP is being prepared by Chesham Town Council, under the Neighbourhood Planning Regulations 2012 and in the context of the emerging Buckinghamshire Local Plan. Once 'made' the CNP will set out a strategy for growth and change up to 2040, allocate sites to deliver the strategy and establish policies against which planning applications will be determined. The made CNP will have material weight when deciding on planning applications.
- 1.3 SEA is a required process for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects.⁴

SEA explained

- 1.4 It is a requirement that the SEA process is undertaken in-line with the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.5 In-line with the Regulations, a report (known as the **Environmental Report**) must be published for consultation alongside the draft plan that assesses "the plan, and reasonable alternatives".⁵ The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.6 More specifically, the Report must answer the following three questions:
 1. What has plan-making / SEA involved **up to this point**?
 - including in relation to 'reasonable alternatives'.
 2. What are the SEA findings **at this stage**?
 - i.e. in relation to the draft plan.
 3. What happens **next**?

This Environmental Report

- 1.7 This report is the Environmental Report for the CNP. It is published alongside the 'pre-submission' version of the plan, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended).
- 1.8 This report answers each of the three questions introduced above in turn.⁶ Each question is answered within a discrete 'part' of the report.
- 1.9 Before answering question 1, there are two further introductory sections.

⁴ Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process. The CNP has been subject to screening, through which it has been determined that SEA is a required. As such, there is a need to submit this Environmental Report (or an update).

⁵ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

⁶ See **Appendix A** for further explanation of the report structure including its regulatory basis.

2. What is the plan seeking to achieve?

Introduction

2.1 This section considers the strategic context before considering the CNP vision and objectives.

The local plan context

2.2 Chesham lies within the former Chiltern District area, which now form part of the unitary Bucks Council in the south east of England.

2.3 The Neighbourhood Plan must be in general conformity with the strategic policies of Bucks County. The development plan primarily comprises the Core Strategy for Chiltern District adopted in 2011 and saved policies from the Chiltern Local Plan adopted in 1997. However, it is important to note that a Buckinghamshire Local Plan is now in preparation, as introduced [here](#).

The CNP vision and objectives

2.4 The current CNP consultation document presents a vision. The vision is set out over six paragraphs, which are not repeated here for brevity, but the first paragraph is of key importance:

“By 2040, Chesham will have grown its population by 10% to remain the third largest town in Buckinghamshire serving its surrounding rural villages. It will have met the housing needs of the local area without needing to extend into the Green Belt or Chiltern AONB by reusing a wider range of brownfield sites in and around the town centre.”

2.5 The following specific objectives are in place to guide plan preparation:

- Deliver new homes and commercial uses in and around the town centre in suitable locations as a viable alternative to continuing peripheral growth into the Green Belt and AONB
- Protect and intensify some employment land to deliver more jobs and to redevelop poorly located employment land
- Redesign movement and access within and through the town to reduce the harmful effects of traffic congestion and HGVs
- Reduce the carbon footprint of the town through a combination of new build environmental performance and of protecting and improving the town's green infrastructure.

2.6 These objectives provide an important starting point for the SEA process, and specifically work to define reasonable alternatives, as discussed in Section 5.

3. What is the scope of the SEA?

Introduction

3.1 The aim here is to introduce the reader to the broad scope of the SEA, i.e. the sustainability topics and objectives that should be a focus of the assessment of the plan and reasonable alternatives.

Consultation

3.2 The SEA Regulations require that “*when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England, and Natural England.⁷ As such, these authorities were consulted in 2020.

The SEA framework

3.3 Through the scoping process an SEA framework was established. Its purpose is to structure the appraisal of the plan and reasonable alternatives.

Table 3.1: The SEA framework

SEA topic	SEA objective
Accessibility (to community infrastructure)	Support / enhance local community infrastructure.
Air quality and wider pollution	Reduce air and wider pollution.
Biodiversity and geodiversity	Protect, enhance and manage biodiversity and geodiversity.
Climate change adaptation	Plan for the anticipated levels of climate change.
Climate change mitigation	Minimise the town’s contribution to climate change.
Communities, health and wellbeing	Safeguard and improve community health, safety and wellbeing.
Economy and employment	Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities.
Historic environment and heritage	Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance
Homes	Provide affordable, environmentally sound and good quality housing for all.

⁷ These consultation bodies were selected “*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes*” (SEA Directive, Article 6(3)).

SEA topic	SEA objective
Landscape	Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening distinctiveness and its special qualities.
Land, soil, and natural resources	Protect and conserve natural resources. Reduce waste generation and achieve the sustainable waste management.
Transport	Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel
Water	Support good management of water resources and the water environment.



Chesham town centre, the town periphery to the north and surrounding countryside

Part 1: What has plan-making/ SEA involved to this point?

4. Introduction (to Part 1)

Overview

- 4.1 Plan-making has been going since 2019, and there have been a number of work stages since that time, including an informal consultation in 2019.
- 4.2 This is important context; however, the aim here is not to provide a comprehensive explanation, or audit trail, of work to date. Rather, the aim is to explain work undertaken to develop and appraise **reasonable alternatives** in early **2023** ahead of finalising the CNP for consultation under Regulation 14.
- 4.3 More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to addressing a particular issue that is of central importance to the plan, namely allocation of land for development. The decision was taken to refer to '**growth scenarios**'.

Why focus on growth scenarios?

- 4.4 The decision was taken to focus on 'growth scenarios' (i.e. alternative approaches to development) in light of the CNP objectives (see Section 2), and due to the likelihood of being able to differentiate between the merits of growth scenarios in respect of 'significant effects' (in line with guidance).

N.B. **individual site options** are not reasonable alternatives (where the objective of the plan is not to allocate an individual site option). However, individual site options are clearly important, and hence are duly considered, including as part of the process of arriving at reasonable growth scenarios.

Who's responsibility?

- 4.5 It is important to be clear that:
 - **Defining scenarios** - is ultimately the responsibility of the plan-maker, although the SEA consultant (AECOM) is well placed to advise.
 - **Assessing scenarios** - is the responsibility of the SEA consultant.
 - **Deciding a preferred approach** - is the responsibility of the plan-maker.

Structure of this part of the report

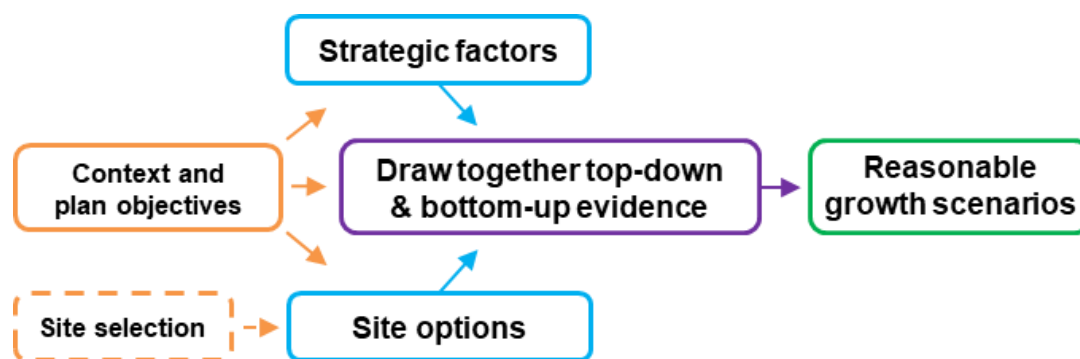
- 4.6 This part of the report is structured as follows:
 - **Chapter 5** - explains the process of defining scenarios.
 - **Chapter 6** - presents the outcomes of assessing scenarios.
 - **Chapter 7** - explains reasons for supporting the preferred approach.

5. Defining growth scenarios

Introduction

5.1 The aim here is to explain a process that led to the definition of growth scenarios for assessment, as summarised in Figure 5.1.⁸

Figure 5.1: Defining growth scenarios



Structure of this section

5.2 This section is structured so as to:

- explore **strategic factors** with a bearing on growth scenarios;
- consider individual **site options** in contention for allocation; and
- draw upon the preceding sections to define **growth scenarios**.

Strategic factors

5.3 As discussed, a key aim of the CNP is to deliver new homes within the urban area, in order to reduce the pressure for greenfield expansion. A 500 home urban extension was proposed by the draft Chiltern and South Bucks Local Plan several years ago, and whilst that plan is no longer being progressed, greenfield land around the town is being [promoted](#) for development through the Buckinghamshire Local Plan, which is in the early stages of preparation.

5.4 All greenfield land surrounding the town falls within the London Green Belt, and the majority (all bar land to the east) falls within the Chilterns Area of Outstanding Natural Beauty (AONB). As such, there would be a need to demonstrate ‘exceptional circumstances’ before releasing land for development through the Local Plan. However, the potential for exceptional circumstances exists due to a clear need for housing growth at Chesham, as one Buckinghamshire’s largest towns.

5.5 In short, a key aim is to reduce the need for greenfield development.

5.6 However, there are also wider highly significant reasons for supporting redevelopment of brownfield / previously developed land (PDL).

⁸ The aim is to meet the legal requirement (Schedule 2(8) of the SEA Regulations) to present “an outline of the reasons for selecting the alternatives dealt with” within the Environmental Report.

- 5.7 Foremost amongst these is the broad aim of regeneration and revitalisation, with the need for this well-established, and many issues / opportunities already having been explored, including through the [Chesham Masterplan](#) and [Regeneration Strategy](#). In practice, a key regeneration opportunity is around redeveloping older industrial and storage sites that are closely integrated with residential areas. There are clear sensitivities around doing so, including mindful of designation for employment use within the adopted Chiltern Local Plan (1997; see Policy Map [here](#)), but there are also clear opportunities.
- 5.8 Perhaps most notably, opportunities are around:
- Reducing problematic HGV traffic and other amenity ('bad neighbour') issues. A strategic goal is to concentrate industry at the edge of the town on the A416.
 - Replacing older industrial sites with mixed-use schemes (i.e. housing and employment) to include modern commercial / business uses, including business space suited to supporting a growing creative industries sector.
 - Supporting population growth locally in proximity to the town centre and train station, with a view to supporting the achievement of transport and climate change mitigation / decarbonisation objectives and supporting / boosting the town centre.
 - Similarly, mixed use redevelopment could support or encourage development of new local shops, services and facilities in the town's suburban areas to give those communities options to walk or cycle rather than having to rely on their cars.
- 5.9 The other key regeneration opportunity is around development of town centre car parks, which again is a strategy associated with clear opportunity but also sensitivity / challenge. The broad aim is to reconfigure rather than reduce town centre parking options, which largely translates as a strategy involving multistorey car parks in place of ground level parking that represents a poor use of land in highly accessible locations. However, reconfiguring car parking options is a contentious issue locally, as understood from March-April 2022 initial consultation (reported [here](#)).
- 5.10 In light of the above discussion there is a clear case for supporting *some* redevelopment of industrial and/or car park land. The key questions are:
- which sites; and
 - how much in total / how many new homes can be assumed?

Site options

- 5.11 A site selection process has been led by the town council, supported by a consultant team, and a separate Site Assessment report is available as part of the current consultation. It is not a defined aim of the SEA process to assess site options; however, naturally it is the case that site options are explored, in a proportionate way, as part of work to define RA growth scenarios.
- 5.12 The Site Assessment Report explains that an initial long list of site options was reduced to a shortlist of 27, and then the decision was taken to focus attention on a refined shortlist. In short, these sites are identified taking into account:

- issues (e.g. amenity, prominence); and
- complexity (notably multiple land ownership and inter-dependencies with other sites, such that there is a need for 'intervention' to over-come barriers to bringing forward planning applications and ultimately redevelopment).

5.13 Shortlisted sites were also identified mindful of clustering, given that clusters of sites can deliver a cumulative benefit for a local area, and because a cluster of sites can lend itself to a Neighbourhood Development Order (NDO; Box 5.1).

5.14 With regards to the non-shortlisted sites, these are by no means ruled out as unsuitable for development (or otherwise not deliverable / developable), but there is pragmatic need to focus time and resources on developing policy, and identifying capacity/yield, for select key sites. A notable cluster of sites at Waterside was initially shortlisted, but then removed late in the process. Non-shortlisted sites have the potential to come forward as 'windfall'.⁹

5.15 Returning to the shortlisted sites, a key task was to differentiate between:

- those where the emerging preferred approach is relatively clear cut; versus
- those where decision-making, in respect of allocation, is more marginal.

5.16 The following sites were identified as more marginal:

- Howard Industrial Estate and Albany Yard & Central Garage – stand-out as having the highest current employment density, such that there is a case for supporting a reduced emphasis on new homes or a continuation of the current employment use.
- Higham Mead – existing employment density is lower, but this is a key site given its size and location. There is potential for a higher-density scheme.
- Water Meadow Car Park – of the four car park allocation options this site warrants particular scrutiny given a location more peripheral to the town centre and given constraints, particularly around flood risk and heritage.

The reasonable growth scenarios

5.17 The final stage in the process (see Figure 5.1) then involved bringing together 'top-down' understanding (strategic factors) and bottom-up understanding (site options) in order to arrive at a set of RA growth scenarios for appraisal and consultation. Ultimately four RA growth scenarios were defined for appraisal:

- Low growth (501 homes) via non-allocation of all four 'marginal' sites.
- Scenario 1 plus allocation of Waterside Meadow Car Park
- Scenario 1 plus allocation of the other three 'marginal sites'.
- Higher growth (848 homes) via allocation of all shortlisted sites.

N.B. the scenarios reflect an assumption that the key choice at each of the four 'marginal' sites is whether or not to allocate the site. However, in practice there could also be a choice regarding the nature of the scheme supported.

⁹ Windfall sites are those that can be anticipated to deliver new homes (and or other uses, e.g. commercial or employment floorspace) in the plan period despite not being allocated within a local or neighbourhood plan. By definition, what will be yielded from windfall sites cannot be predicted with any certainty, and so there is a need to make a conservative estimate, as part of the process of establishing a supply of new homes (and/or other uses) to meet needs (etc.) through a local or neighbourhood plan.

Box 5.1: What is an NDO and what is the proposal for Chesham?

A Neighbourhood Development Order (NDO) is the equivalent of an outline planning permission, such that all that remains is to apply for, and receive, 'reserved matters' planning permission before development can occur. Whilst outline planning applications are typically made by landowners / developers, NDOs are prepared by designated neighbourhood groups (such as Chesham TC) under the Localism Act (2011). This is in addition to, or instead of, a neighbourhood plan. An NDO is essentially a step further than a neighbourhood plan allocation. All sites in Chesham covered by an NDO will also be an allocation in the CNP, but if they were an allocation alone then confidence in their ability to deliver homes within the plan period (and in the anticipated timeframe) would be lower. This is because all the sites in question are complex and, in turn, involve financial risk. An NDO aims to de-risk the process of bringing a site forward for development, and so encourage landowners to act. The upshot will be that the independent examiner tasked with eventually examining the CNP will be confident in the CNP housing supply trajectory, mindful that punitive measures are in place where a local authority (in this case Buckinghamshire Council) commits to a supply trajectory only for delivery to fall short of what is committed in practice. In this way NDOs are a key means of enabling a strongly 'brownfield-first' housing strategy. Because of equivalence to an outline permission, preparing an NDO involves a considerable amount of work. The shortlisted sites might be grouped into three NDOs according to clusters or, alternatively, it may be appropriate to group all sites as a single NDO. The proposal is for the NDOs to be prepared in parallel with the CNP, and it should NDOs can require Environmental Impact Assessment (EIA).

Table 5.1: The reasonable alternative growth scenarios (constants greyed out)

Supply component	Cluster	Growth scenarios (number of homes)			
		1	2	3	4
Windfall	N/a	115	115	115	115
Howard Industrial Estate	New Town	0	0	62	62
Alma Road Ind. Estate		62	62	62	62
Bellingdon Rd / Deanway		54	54	54	54
Cameron Rd Ind. Building		4	4	4	4
Station Car Park	Town centre	75	75	75	75
Star Yard / Catlings CP		78	78	78	78
Car Park adj. Sainsburys		37	37	37	37
Water Meadow Car Park		0	50	0	50
UK House, White Hill		21	21	21	21
Wenzels, Broad Street		20	20	20	20
Higham Mead	The Yards	0	0	135	135
Chesham Business Park		25	25	25	25
Cape House, Bellingdon Rd		10	10	10	10
Albany Yd & Central Garage		0	0	100	100
Total homes		501	551	798	848

6. Growth scenarios assessment

Introduction

6.1 The aim of this section is to present assessment findings in relation to the four reasonable alternative growth scenarios introduced above.

Assessment findings

6.2 Table 6.1 presents the assessment. With regards to methodology

Within each row the columns firstly rank the scenarios in order of preference and then, secondly, highlight instances of a predicted positive (**green**), minor positive (**light green**), minor negative (**amber**) or negative (**red**) significant effect on the baseline. Also, ‘ = ’ is used to denote performance on a par.

Table 6.1: Growth scenarios assessment findings

Topic	Scenario 1 10 Sites 501 homes	Scenario 2 11 Sites 551 homes	Scenario 3 13 Sites 798 homes	Scenario 4 14 Sites 848 homes
Accessibility	2	2	★1	★1
Air quality	=	=	=	=
Biodiversity	=	=	=	=
Climate change adaptation	★1	2	★1	2
Climate change mitigation	=	=	=	=
Communities	2	2	★1	2
Economy	=	=	=	=
Historic env.	=	=	=	=
Homes	=	=	=	=
Land	4	3	2	★1
Landscape	4	3	2	★1
Transport	2	2	★1	2
Water	=	=	=	=

Discussion

The assessment finds **Scenario 3** to perform well in absolute and/or relative terms under a range of topic headings. Scenario 3 involves 'higher growth' without allocation of Waterside Meadow Car Park, which is a constrained site and likely to be necessary for a multi-storey carpark, rather than development for homes.

Support for a relatively high growth scenario – under specific topic headings – reflects an assumption that the baseline situation is one whereby there is considerable **greenfield expansion** of Chesham and key urban sites are not brought forward for redevelopment (or at least not in a way that is considered optimal, as understood on the basis of the work completed to date).

However, this is by no means a safe assumption, such that the assessment conclusions are uncertain. It will be for the Buckinghamshire Local Plan to determine an appropriate growth strategy for the town, accounting for urban supply and wider strategic issues/opportunities. What is certain is that the case for demonstrating the exceptional circumstances necessary to justify greenfield urban expansion of Chesham would be significantly reduced under Scenarios 3 and 4.

A final key assumption is that a high growth strategy would deliver as anticipated. However, in practice, and even with one or more NDOs, there would be significant **delivery risk**. Non delivery would mean that the benefits of redevelopment are not realised, and also the effect would be to place pressure on Buckinghamshire's housing land supply position (i.e. ability to pass the Housing Delivery Test and maintain a five-year housing land supply). In turn, this would increase the risk of the County being subject to the presumption in favour of Sustainable Development (NPPF paragraph 11) which, in turn, would lead to a risk of development coming forward in a relatively unplanned way (e.g. 'planning by appeal').

Having made these opening remarks, the following bullets consider topics in turn:

- **Accessibility** – a key aim is to ensure population growth in proximity to the town centre, and numerous of the shortlisted urban site options would deliver new community infrastructure, including certain of the 'marginal' sites that are a variable across the growth scenarios (not Waterside Meadow Car Park).

However, there is a need to recognise that greenfield urban expansions can deliver new *strategic* community infrastructure, e.g. a new school.

- **Air quality** – is a significant issue in Chesham, with an extensive air quality management area (AQMA) in the vicinity of the town centre. However, air quality is improving nationally due to the switch-over to electric vehicles.

There are clear transport and, in turn, air quality arguments an ambitious urban regeneration strategy (discussed below). However, focusing growth around the town centre could equally create challenges. Also, it could feasibly be the case that greenfield expansion options can be identified that deliver, or support, innovative transport solutions that are supported from air quality perspective.

- **Biodiversity** – on the one hand, there is a clear case for maximising brownfield supply and, in turn, minimising pressure on greenfield land around the urban edge, where there are clear biodiversity sensitivities, e.g. a network of linear ancient woodlands along the valleys / transport corridors that radiate out from the town. However, on the other hand, a strongly brownfield first strategy could create challenges in terms of mitigating recreational pressure on the Ashridge Common and Woods SSSI component of the Chilterns Beechwoods SAC. Greenfield development could be preferable given potential to deliver new Suitable Alternative Natural Greenspace (SANG) onsite or nearby.

A further consideration is the River Chess, which is a key sensitivity within the urban area. However, there is little reason to suggest that redevelopment in proximity gives rise to a significant concern. With regards to Water Meadow Car Park, if it is not developed for new homes (Scenarios 2 and 4) it could well be necessary to deliver a multi-storey car park here.

- **Climate change adaptation** – the key issue here is flood risk, particularly fluvial but also surface water, with the latter being a significant issue in Chesham given the topography / close association of the town with a series of steep-sided ‘dry valleys’. There is a need to acknowledge instances of land historically having been seen as appropriate for a low intensity use (industry, commerce, car parking) due to flood risk, and this is most notably the case for Water Meadows Car Park. Flood risk is set to worsen due to climate change; however, on the other hand, the practice of avoiding risk through building design (etc) is improving. It is not at all uncommon for sensitive brownfield redevelopment within areas of flood risk, typically to include non-residential on the ground floor.

- **Climate change mitigation** – is a key issue and a focus of discussion within the ‘draft plan appraisal’ section of this report. However, it is a challenge to meaningfully differentiate between the merits of the RA growth scenarios.

Transport emissions are key, and issues/opportunities are discussed below. With regards to minimising built environment emissions, on the one hand complex brownfield sites with challenging viability can result in ‘operational emissions’ opportunities missed relative to greenfield development. However, on the other hand, high density development gives rise to operational emissions opportunities and making best use of existing buildings (as opposed to demolition and re-build) is key for minimising ‘embodied’ emissions.

- **Communities** – as discussed, there is local support for avoiding greenfield urban expansion and also for addressing the issue of ‘bad neighbour’ land uses. Furthermore, the NDO process has involved in-depth work to prepare design codes for all of the shortlisted site options, and indications to date are that the design proposals are broadly well-received, e.g. with a focus on mixed use schemes and terraced homes (a feature of Chesham) in addition to flats.

There are local concerns around the reconfiguration of town centre car-parking; however, there is a good degree of confidence in the ability to avoid a net loss in car parking through delivery of new multi-storey car parks, at least under those scenarios not involving development of Water Meadow Car Park. Also, it is anticipated that the effect of the neighbourhood plan will be to support modal shift away from the private car, therefore reducing demand for car parking or, at least, avoiding an increase in demand (given an increased local population).¹⁰

However, there are uncertainties regarding the potential to deliver high urban housing growth alongside sufficient town centre car parking.

- **Economy** – under Scenarios 3 and 4 there may be a net loss of employment opportunity in the town, but this is uncertain, and in all likelihood any net loss would be small. Potentially more significant are the benefits associated with supporting a shift to higher value employment uses, including associated with the creative sector. Also, it could feasibly be the case that a clear focus on industrial and storage/logistics uses at the northern and southern extent of the town allows these areas to flourish and potentially expand.

¹⁰ Emerging policy CHESH4 sets out that public car parking must be re-provided close to the town centre before it is lost.

However, it is recognised that there is a need to ensure employment opportunities suited to the skills of the local population and avoid a situation whereby lower skilled workers are unable to find local employment. It is recognised that the employment land designations within the current Chiltern Local Plan (1997), whilst very dated, were defined for a reason.

- **Historic environment** – whilst this is an important issue, it is difficult to differentiate between the scenarios with any confidence. Several of the sites in question have clear historic environment sensitivity, including Waterside Meadows Car Park, which is adjacent to Chesham Old Town and within the Chesham Conservation Area. However, sensitive redevelopment in line with a design code could lead to an improvement on the baseline situation. Other considerations are: the heritage value of industrial buildings (including early 20th Century heritage); and the need to consider secondary impacts, e.g. from increased traffic and/or problematic car parking (e.g. in the Old Town).
- **Homes** – a ‘moderate or uncertain negative effect’ is flagged across the growth scenarios to reflect certain risks with a strongly ‘brownfield first’ strategy.

Firstly, as has been discussed, under higher growth scenarios there could be a risk of the homes not delivering as anticipated, leading to issues in respect of meeting locally arising housing needs (also wider issues around delivering the committed housing land supply trajectory at the Bucks scale, although this is less of a ‘housing’ issue). For example: development of the car park sites is dependent on new multistorey car parking capacity being in place; and redevelopment of Albany Yard is dependent on a new site being found for the Elgiva Theatre. More broadly, all of the sites are associated with complexities / delivery challenges, including multiple land ownership and a need to factor in current (and potential alternative future) use values when considering development viability (e.g. Waterside Meadow Car Park may not be viable for housing given a potential alternative use as a multi-storey car park). Viability and wider deliverability concerns are greatly reduced on the basis of an assumption that NDOs would be in place; however, there are uncertainties.¹¹ A further consideration is that delivery risk will be reduced if there is a clear and early steer from Bucks Council that the Local Plan will not support or limit greenfield expansion, but it is not known if this will be the case.

Secondly, whilst housing mix is being very carefully considered through the NDO / design code process, it is inherently the case that greenfield sites are associated with greater potential to deliver new family homes with gardens.

Thirdly, challenging development viability can, and likely would, limit the potential to affordable housing in line with established policy. In practice, this could mean that the proportion of new homes delivered as affordable is less than the policy intent and/or there is a focus on shared ownership affordable housing, rather than affordable or social rented affordable housing.

- **Land** – there is a clear case for minimising pressure on the productive agricultural land that surrounds the town. The nationally available ‘provisional’ dataset shows all land surrounding the town to be of ‘grade 3’ quality, such that it may or may not be ‘best and most versatile’, which the NPPF classes as land that is of grade 1, grade 2 or grade 3a quality. No land surrounding the town has been surveyed in detail to establish agricultural land quality.

¹¹ There remains uncertainty regarding whether there would be a need for Environmental Impact Assessment (EIA) alongside development of the NDO(s). Undertaking EIA would require time and resources, and so could create a challenge for the NDO(s).

However, again, it is important to say that over-reliance on brownfield sites could be counter-productive, from a perspective of seeking to avoid loss of sensitive greenfield land, if the homes do not come forward as expected leading to pressure on the Buckinghamshire housing land supply position.

- **Landscape** – there is a very clear need to avoid pressure on the Chilterns AONB, and even land to the east of the town that falls outside of the AONB is associated with clear landscape sensitivity. Chesham is very strongly associated with growth along valleys that are also historic transport corridors, hence there is an inherent risk of problematic ‘sprawl’. Raised ground has clear landscape sensitivity, and along the valleys / transport corridors outside the town are valued villages, hamlets and farmsteads, at risk of coalescence.
- **Transport** – as discussed above, under Scenario 3 the aim is to:
 - Reduce problematic HGV traffic through the town, with industry and storage/ logistics instead concentrated at the edge of the town, directly on the A416.
 - Support population growth locally in proximity to the town centre and train station, supporting modal shift away from the private car and, in turn, supporting the achievement of transport and climate change mitigation / decarbonisation objectives (and supporting / boosting the town centre). Similarly, the proposal is for mixed-use developments to deliver/support new local shops, services and facilities in the town’s suburban areas to give those communities options to walk or cycle rather than having to rely on their cars.

However, there is also a need to recognise that concentrating housing growth in and around the town centre could potentially lead to certain challenges in respect of avoiding traffic congestion. Also, large urban extensions can often deliver targeted new or upgraded transport infrastructure in line with strategic objectives (e.g. in line with the emerging Bucks Local Transport Plan 5).

With regards to Scenario 4, whilst there are arguments for delivering a high quality new housing scheme at Waterside Meadow, the latest view is that the site will be needed for a multi-storey car park in support of housing growth.

- **Water** – both water supply and wastewater / water quality are significant issues locally; however, it is difficult to differentiate between the growth scenarios with any confidence. With regards to water supply, this is a larger-than-local issue, being addressed by Affinity Water’s Water Resource Management Plan (2019). With regards to wastewater / water quality, there is little reason to suggest that Scenario 4 would lead to a high growth strategy for Chesham that puts pressure on Chesham Sewage Treatment Works (located on the River Chess close to Latimer). However, there is uncertainty ahead of capacity at the treatment works (in terms of hydraulic capacity and/or capacity of the receiving water course during periods of low flow) being examined further, likely through a Water Cycle Study for Buckinghamshire. It is noted that a national [mapping resource](#) shows the treatment works to have discharged raw sewage into the Chess on two occasions in 2022, which is not necessarily indicative of a particular issue in the national context. Another issue can be the local sewer network, and this can be a particular constraint to growth within urban areas.

Water companies value early certainty on growth strategy, and can prefer a concentration of growth, from a perspective of early and effective planning for water infrastructure (treatment works and sewers), but there is no reason to suggest that Scenario 4 gives rise to a significant concern.

7. The preferred approach

Introduction

- 7.1 The aim of this section is to present the Town Council's response to the assessment presented above.

Reasons for supporting Scenario 3

- 7.2 The Town Council (via their advisory consultant team), responded to the growth scenarios assessment as follows:

“Scenario 3 is supported on balance, in light of the assessment. It performs well in a number of respects, although it is recognised that the assessment serves to highlight certain risks and tensions with sustainability objectives. There will be the potential to address issues / tensions and uncertainties ahead of finalising the plan for submission. In particular, there is a need to progress one or more NDOs, and it is also recognised that more work is required in respect of the Chilterns Beechwoods SAC constraint.

Scenario 3 reflects an ambitious but realistic approach to brownfield-first regeneration within Chesham. The assumption of ~800 homes from 13 key regeneration sites and windfall in the plan period is strongly evidenced on the basis of numerous workstreams completed over a period of years.

Numerous issues and opportunities have had to be balanced. For example, Waterside Meadow is not allocated for new homes on balance, because it is better suited to delivering a multi-storey car park. Whilst maximising supply of new homes within the Chesham urban area will minimise pressure for greenfield expansion (and also help to realise wider objectives), potential tensions / concerns do exist, including around traffic generation and car parking. It is also recognised that there is a need to assume supply (of new homes) only from those sites with strong viability and deliverability credentials, given the importance of a robust committed supply.”

Part 2: What are the SEA findings at this stage?

8. Introduction (to Part 2)

- 8.1 The aim here is to present an assessment of the Draft CNP as a whole.
- 8.2 In practice, this means re-presenting the assessment of Growth Scenario 3 alongside consideration of wider aspects of the plan, including thematic policy.

Overview of the CNP

- 8.3 The plan presents the following policies:
- Policy 1: A spatial strategy for the town (see **Box 8.1**)
 - Policy 2: Key regeneration sites
 - Policy 3: Other brownfield opportunities
 - Policy 4: Public car parking
 - Policy 5: Economic growth locations
 - Policy 6: Town centre
 - Policy 7: Local shops and services
 - Policy 8: Design character areas
 - Policy 9: Chesham design code
 - Policy 10: Local heritage assets
 - Policy 11: Green infrastructure network
 - Policy 12: Local green space
 - Policy 13: Zero carbon building
 - Policy 14: Urban greening
 - Policy 15: Affordable housing
 - Policy 16: Flood risk & mains sewage
 - Policy 17: Residential parking standard
 - Policy 18: Chesham design code panel
 - Policy 19: Chiltern beechwoods SAC

Assessment methodology

- 8.4 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.1**) as a methodological framework. Effects are predicted taking account Schedule 1 of the SEA Regulations, e.g. such that consideration is given to a wide range of effects with varying characteristics, e.g. long term.
- 8.5 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline that is inevitably limited. In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits of the draft plan in more general terms.

Box 8.1: Policy CHESH1 and select supporting text

The Neighbourhood Plan consolidates and strengthens the role of Chesham as a vital sub-regional town in Buckinghamshire by making provision for at least 800 new homes and 17,000 sq.m. of new commercial, business and services floorspace... The spatial strategy comprises:

- the relocation of older industrial uses from residential areas and the redevelopment of the land for housing and housing-led, mixed use schemes including modern commercial, business and service uses that are especially suited to bolstering the creative industries sector of the town's economy
- the safeguarding of established employment land of strategic value with direct access to the A416 to the north and south of the town
- as a result, the protection of the Green Belt and Chilterns AONB from inappropriate development with no exceptional circumstances to justify the release of land for greenfield development
- the regeneration of the town centre as a valued social and economic space with a new cultural venue at its heart, new public realm, better public transport connectivity and a significant increase in new homes
- encouraging the development of new local shops, services and facilities in the town's suburban areas to give those communities options to walk or cycle rather than having to rely on their cars.

The five spatial strategy elements are mutually-dependent and bolster each other.

The replacement of part of the town's legacy of older industrial sites will shift the town's economic position to higher value-added businesses and other types of commercial uses that are generally more resilient to changes in the economic cycle. It will also remove many uses that have become poor neighbours to the tight residential streets that now surround them...

That in turn makes available brownfield land to build new homes close to, and no further than an 800m walk from, the town centre. The number and type of sites will enable a wide variety of houses and flats to meet local housing needs...

This will bolster the town centre by increasing footfall and demand for its commercial and cultural uses. Those uses will be focused on distinct zones based on the existing building stock and development to provide modern business units.

A more vibrant and vital town centre will become part of an economically more successful town, which supplements this growth by intensifying its well-established, largest employment sites that are the best served by the highway network and by public transport.

But not all of the town is within walking distance of the town centre, and distances are exaggerated by the town's hills and valleys. In which case, more can be made of land as it becomes available to encourage the building of new local shops and services in the outlying suburban areas.

Although residents will still want and need to use their cars, having more choice closer to them will help create a healthier town.

9. Assessment of the CNP

- 9.1 A discussion is presented under each of the thematic headings that together comprise the core of the SEA framework (see Section 3). Under each heading consideration is given to: A) spatial strategy; and B) thematic policies.

Accessibility

Spatial strategy

- 9.2 A key aim is to ensure population growth in proximity to the town centre, and the majority of the proposed Key Regeneration Sites would deliver new community infrastructure. However, there is a need to recognise that greenfield urban expansions can deliver new *strategic* community infrastructure.

- 9.3 The other key issue for consideration here is town centre car-parking, which is seen as a key issue locally. It is anticipated that the effect of the neighbourhood plan will be to support modal shift away from the private car, therefore reducing demand for car parking or, at least, avoiding an increase in demand (given an increased local population). However, there will still be a need to avoid no net loss of town centre car parking. The plan explains:

“Although we have an ambition to reduce car usage in the long term by encouraging active travel, we recognise the importance of providing sufficient parking spaces for people who need them. Maintaining the same level of parking that there is now will be a challenge, so the Plan contains options for building a new multi storey car park for the town centre. Other nearby towns, such as Amersham and Berkhamsted, have multi storey car parks....”

- 9.4 Policy 4 (Public Car Parking) then explains

“The Neighbourhood Plan safeguards land in the following locations... for the potential future development of multi-storey car parks to relocate existing public car parking spaces: Albany Gate; Sainsburys Car Park; Water Meadow. Development proposals must not lead to a net loss of public car parking...”

- 9.5 Ultimately, it is important to recognise that there are uncertainties in respect of delivering the housing growth strategy alongside no net loss of town centre car parking. There can be more work to explore matters ahead of plan finalisation.

Thematic policies

- 9.6 See discussion of policies under the ‘Communities’ heading, below.

Conclusion

- 9.7 The spatial strategy is supported by there are uncertainties and, in turn, potential tensions / drawbacks. Broadly **neutral effects** are predicted.

Air quality

Spatial strategy

- 9.8 Air quality is a significant issue in Chesham, with an extensive air quality management area (AQMA) in the vicinity of the town centre. However, air quality is improving nationally due to the switch-over to electric vehicles.

9.9 There are clear transport and, in turn, air quality arguments an ambitious urban regeneration strategy (discussed below). However, focusing growth around the town centre could equally create challenges, including given the discussion above regarding town centre carparking.

9.10 Also, it could feasibly be the case that greenfield expansion options can be identified that deliver, or support, innovative transport solutions that are supported from air quality perspective.

Thematic policies

9.11 There are no thematic policies that aim to deal specifically with air quality, but several are focused on modal shift away from the private car and reducing the need to travel.

Conclusion

9.12 The spatial strategy is supported by there are uncertainties and, in turn, potential tensions / drawbacks. Broadly **neutral effects** are predicted.

Biodiversity

Spatial strategy

9.13 On the one hand, there is a clear case for maximising brownfield supply and, in turn, minimising pressure on greenfield land around the urban edge, where there are clear biodiversity sensitivities, e.g. a network of linear ancient woodlands along the valleys / transport corridors that radiate out from the town.

9.14 However, on the other hand, a strongly brownfield first strategy could create challenges in terms of mitigating recreational pressure on the Ashridge Common and Woods SSSI component of the Chilterns Beechwoods SAC. Greenfield development could be preferable given potential to deliver new Suitable Alternative Natural Greenspace (SANG) onsite or nearby.

9.15 A further consideration is the River Chess, which is a key sensitivity within the urban area. However, there is little reason to suggest that redevelopment in proximity gives rise to a significant concern. Water Meadow Car Park is in close proximity, but there is no reason to suggest that a multi-storey car park here gives rise to any particular concerns.

Thematic policies

9.16 There are a number of policies for consideration here:

- Policy 11 (Green infrastructure) – defines a network of green infrastructure assets and requires: *“Development proposals that lie within or adjoining the Network are required to have full regard to creating, maintaining and improving the network...”* It also specifically states: *“Proposals that have the potential to affect the Vale Brook, as shown on the Policies Map, must ensure that they maintain or improve its function as a main river with a sustainable urban drainage and biodiversity value.”*
- Policy 12 (Local green spaces) designates a series of Local Green Spaces in accordance with paragraphs 100 -102 of the NPPF. A designation has the policy effect of the equivalence of the Green Belt.

- Policy 14 (Urban greening) is inspired by the London Plan principle of an Urban Greening Factor (UGF) to encourage more and better urban greening as the prime means of increasing climate resilience. The policy sets targets for new residential (a factor of 0.4) and commercial (0.3) uses and only applies to major applications. Supporting text explains:

“With the intensification in parts of the area in the coming years, there is a premium on making a step change in its climate resilience. It is therefore reasonable to adopt a these UGF targets and, given land values and the positive approach taken to enabling new development, there is no reason to believe that the target will undermine the viability of new developments.”

“The Urban greening should be a fundamental and integral element of site and building design in the future, incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.”

- Policy 19 (Chilterns Beechwoods) – sets out a need for further work.

Conclusion

9.17 The spatial strategy is supported by there are uncertainties and, in turn, potential tensions / drawbacks. The proposed policy framework is strong, including in respect of green infrastructure and urban greening, but there is a need for more work in respect of mitigating increased recreational pressure on the Chilterns Beechwoods SAC. Broadly **neutral effects** are predicted.

Climate change adaptation

Spatial strategy

9.18 The key issue here is flood risk, particularly fluvial but also surface water, with the latter being a significant issue in Chesham given the topography / close association of the town with a series of steep-sided ‘dry valleys’. There is a need to acknowledge instances of land historically having been seen as appropriate for a low intensity use (industry, commerce, car parking) due to flood risk. Flood risk is set to worsen due to climate change; however, on the other hand, the practice of avoiding risk through building design (etc) is improving. It is not at all uncommon for sensitive brownfield redevelopment within areas of flood risk, typically to include non-residential on the ground floor.

9.19 As well as proposed redevelopment sites, there is also a need to note the reliance that is placed on Water Meadow surface car park to deliver a multi-story. This site is affected by flood risk, and it could prove that a multi-storey car park is less well suited than a surface level car park, including from a perspective of seeking to store water in times of flood.

Thematic policies

9.20 Policy 16 (Flood risk) aims to draws attention to those areas of the town that are at greater risk of fluvial flooding (from the River Chess and Vale Brook) and also considers surface water flood risk. The policy wording matches that of the NPPF in respect of how flood risk must be managed.

9.21 The policy also draws attention to existing problems in respect of the capacity and quality of the local sewage network. Although Thames Water is obliged to connect new developments to its network, this policy is intended to prevent schemes coming forward ahead of upgrades the network.

Conclusion

9.22 There is a need for further engagement with the Environment Agency to confirm the suitability of a spatial strategy that strongly focuses housing growth in the Chesham urban area. Broadly **neutral effects** are predicted.

Climate change mitigation

Spatial strategy

9.23 Focusing on built environment greenhouse gas emissions, on the one hand complex brownfield sites with challenging viability can result in ‘operational emissions’ opportunities missed relative to greenfield development. However, on the other hand, high density development gives rise to operational emissions opportunities and making best use of existing buildings (as opposed to demolition and re-build) is key for minimising ‘embodied’ emissions. There could also potentially be heat network opportunities to be explored, but heat networks are typically technically challenging and costly to deliver.

Thematic policies

9.24 Policy 13 (Zero carbon buildings) is in several parts.

- Clause A requires consideration of energy performance at the very initial stages of design.
- Clause B requires the developer of a consented housing development scheme of any size to carry out a Post-Occupancy Evaluation (POE) including actual metered energy use, and then to address any issues.
- Clause C encourages all schemes, no matter what their intended use or size other than householder extensions, to use the Passivhaus Planning Package (PHPP) or equivalent design methodology for all buildings where it is feasible to do so. Certified Passivhaus (or equivalent) schemes are not required to meet the provisions of Clause B.

9.25 With regards to challenges and tensions, the supporting text explains:

“In respect of scheme viability, any extra-over cost of building to the ‘zero carbon ready’ Passivhaus standard (now less than 5%) will diminish to zero well within the period of this Plan...

... The policy anticipates that in order to achieve a zero carbon standard the scheme design may need to be innovative in its building forms and plot characteristics and some compromise may be needed.

... Within the Conservation Area proposals must be able to show that such a compromise will only lead to minor harm to its character and appearance of a scale that is outweighed by the climate change mitigation benefit.

Elsewhere in the Parish applicants will still be required to show how any compromise will not undermine the character of the local area as defined by the Parish Character Study.”

9.26 Ultimately, this policy is strongly supported. It seeks to tread a fine line between nudging developers towards net zero development (ideally to be achieved onsite, i.e. without resorting to offsetting) on the one hand and, on the other hand, setting requirements that lead to viability and ultimately delivery challenges. The policy is also strongly focused on efficiency (i.e. a ‘fabric first’) approach to net zero development and is therefore in line with an ‘energy hierarchy’ approach to net zero development (efficiency→renewable energy→offsetting as a last resort). A number of local plans are adopting, or seeking to adopt, policies that go further, taking the same ‘energy-based’ approach to calculating the energy use of buildings (see discussion [here](#), where the energy-based approach is contrasted to the alternative method applied under the Buildings Regulations regime) but ultimately requiring net zero development (onsite if at all possible, i.e. without offsetting). However, it is recognised that this approach could be a step too far for the Chesham NP.

Conclusion

9.27 There is support for an urban focused strategy and the proposed development management policy is ambitious. It should serve to at least shine a strong light on planning applications such that developers are encouraged to go significant beyond the minimum requirements set out in Building Regulations. On balance **moderate or uncertain positive effects** are predicted.

Communities

Spatial strategy

9.28 There is clear local support for the spatial strategy given local support for avoiding greenfield urban expansion and also given the opportunities specifically associated with brownfield regeneration, e.g. addressing the issue of ‘bad neighbour’ land uses.

9.29 Furthermore, the NDO process has involved in-depth work to prepare design codes for all of the shortlisted site options, and indications to date are that the design proposals are broadly well-received, e.g. with a focus on mixed use schemes and terraced homes (a feature of Chesham) in addition to flats.

9.30 The plan document explains:

“The Plan includes a new Chesham Design Code that sets out the detailed design requirements for all new buildings across the older parts of the town. The community engagement work showed that most people preferred a traditional approach to building design and materials that are distinct to Chesham. For the more modern suburbs on the edges of the town, the Plan has defined local character areas with general design guidance. The Code is a truly ground breaking piece of work which will ensure that we do not compromise on design.”

“In order to maximise the opportunities that exist on brownfield land, flats and maisonettes will feature within the new developments as part of a broad mix of housing types. Many of these new homes will be terraced homes with gardens but others may be in taller town houses or warehouse-type schemes. The proposed house types are flexible, and could be built as individual homes, maisonettes, or flats and be converted in the future to adapt to changing housing needs.”

9.31 However, as per discussion under other topic headings, there is a need to recognise that there are uncertainties associated with the deliverability of the proposed strategy, and consequences should it not deliver as anticipated.

Thematic policies

9.32 There are numerous policies for consideration here:

- Policy 6 (Chesham Town Centre) establishes key principles for the rejuvenation of the town centre in so far as the current constraints on land use planning policy and development management principles allow. The policy encourages a shift from retail space to housing and other commercial uses on the town centre fringes and a focus on a core retail and cultural offer at its centre. As part of this, the boundary of the defined town centre is modified, with the intention of creating four distinct but complementary zones that together are intended to encourage and focus investment.

In the current absence of specific planning controls on the mix of town centre uses (now all part of Class E), the policy is intended to signal to stakeholders – notably land and property owners and managers – a long term commercial strategy that will play to the locational and character advantages of each zone. It also directs future public and other investment in the public realm to reinforce those distinctions and advantages.

- Policy 7 (Local shops and services) supports Class E (a-f) uses (small food retail, café, medical facility, nursery) and local community uses in “*primarily residential areas and that lie more than a 800m walk from the town centre.*” The supporting text explains:

“The Greenway at Hivings Park on the most northern edge of the town is a hub of local shops and school and provides a good example of how access to this range of convenient facilities gives local people a choice not to have to drive into town for every need. The same type of hub may be achievable over time with this policy encouragement as opportunities arise to develop land in the Newtown/Nalders/Lye Green, Waterside/Bois Moor and Chartridge/Asheridge areas that all lie beyond a practical 800m walk of the town centre and currently have few or no such facilities.”

- Policy 8 (Character areas) aims for a ‘design character area’ approach that recognises that Chesham is a town of many distinct parts reflecting its history. It then establishes key design principles for each area.

N.B. the Chesham Design Code applies to the older character areas of the town only. As a *code* it operates differently to the design *guidance*.

- Policy 9 (Chesham Design Code) requires that all proposals must accord with the Design Code as relevant to their nature, scale and location. The parts of the town to which the Code applies are primarily the ‘Tightly Formed Centre’, ‘Town Centre Fringes’ and ‘Suburban Roads’ Design Character Areas of Policy CHESH8.

The Code distinguishes between design principles that *must* be adhered to and those that *should* be adhered to unless it can be shown that there is a valid reason not to do so. It is derived from extensive community consultation, and the intention is to establish a Chesham ‘pattern book’.

For the Key Regeneration Sites the Code contains site-specific masterplans setting out how its provisions relate to each of those sites.

Conclusion

- 9.33 There is support for an urban focused housing growth strategy that reduces pressure for urban expansion, and there are also regeneration opportunities to be realised via strong support for an urban focused housing growth strategy. However, again, it is important to be clear that there are risks and uncertainties associated with the strategy, which require further consideration ahead of plan finalisation, and it may also be for Bucks Council to take a view through the Local Plan process regarding the number of homes that can be assumed to come forward in the Chesham urban area in the plan period.
- 9.34 The proposed development management policy is very strong, including the carefully considered strategy for the town centre and a best practice approach to ensuring good design via policies on character areas and a Chesham Design Code. On balance **moderate or uncertain positive effects** are predicted.

Economy

Spatial strategy

- 9.35 The plan document explains:

“Within most sites identified for redevelopment in the Plan there is a generous provision for new commercial space to meet a variety of modern business needs. This will be a flexible use, allowing... employers to invest in Chesham.

In addition, the Plan seeks to protect the most important existing employment sites from a loss to housing and to encourage further job growth on them. Together these proposals should mean there is no net loss of jobs...

“... The 17,000 sq.m. of new commercial, business and service uses will help compensate for the loss of approx. 5 Ha of existing Class E (former B1c/B2) uses, given the higher employment densities.”

- 9.36 There may be a net loss of employment opportunity in the town, but this is uncertain, and in all likelihood any net loss would be small. Potentially more significant are the benefits associated with supporting a shift to higher value employment uses, including associated with the creative sector.
- 9.37 Also, it could feasibly be the case that a clear focus on industrial and storage/logistics uses at the northern and southern extent of the town allows these areas to flourish and potentially expand.
- 9.38 However, it is recognised that there is a need to ensure employment opportunities suited to the skills of the local population and avoid a situation whereby lower skilled workers are unable to find local employment. It is recognised that the designations within the current Chiltern Local Plan (1997), whilst very dated, were defined for a reason. The plan explains:
- “The policy updates Chiltern District Local Plan Policy E3 (Areas for business and storage or distribution development) for Chesham by removing the protection it gave to this type of employment land from those sites it identified. That policy is very out of date in its single zoning of land for this purpose and is now inconsistent with the CNP vision and spatial objectives. The Economic Growth Locations are considered to remain those that warrant protection from changes of use.”*

Thematic policies

9.39 There are no thematic policies that aim to deal specifically with employment, other than the policies discussed above (under ‘spatial strategy’).

Conclusion

9.40 The proposed strategy is carefully considered, but there remains a degree of concern regarding loss of existing employment land / specific types of employment land. Concerns relate to employment opportunities at the Chesham scale and also potentially the role of existing employment land in terms of supporting the wider economy (strategic matters will be explored further through the Bucks Local Plan). Broadly **neutral effects** are predicted.

Historic environment

Spatial strategy

9.41 Several of the sites in question have clear historic environment sensitivity. However, sensitive redevelopment in line with a design code could lead to an improvement on the baseline situation.

9.42 One key consideration is potentially Waterside Meadows Car Park, which is adjacent to Chesham Old Town and within the Chesham Conservation Area. Under the proposed strategy it could well be needed to deliver a multi-storey carpark. The plan states the following regarding multistorey carparks:

“With that form of building in mind, each site has some environmental constraints – notably heritage as they lie within the Conservation Area or its setting – and national, local and other CNP policies require that the design solution must be appropriate.”

9.43 Other considerations are: the heritage value of industrial buildings (including early 20th Century heritage); and the need to consider secondary impacts, e.g. from increased traffic and/or problematic car parking.

Thematic policies

9.44 Policy 10 (Local heritage assets) identifies a number of buildings or structures as Local Heritage Assets in order to give them additional protection (via NPPF paragraph 203), in recognition of the important contribution that they make to the special character of the town. They are not, however, statutory listed buildings (‘designated heritage assets’) and do not therefore benefit from the separate legislative and national policy protection afforded to those buildings.

9.45 With regards to methodology, the plan document explains:

The Town Council has reviewed the local content of the Buckinghamshire Historic Environment Record, the Buckinghamshire Council ‘Local Heritage List’ and undertaken its own survey to see if there are any other candidate buildings or structures that warrant this same status using the same selection criteria.

Conclusion

9.46 In conclusion, whilst the character areas / design code approach is strongly supported, there remain some questions and potential tensions, which Historic England will wish to comment upon. Broadly **neutral effects** are predicted.

Homes

Spatial strategy

9.47 There certain risks associated with a strongly 'brownfield first' strategy (i.e. a strategy that might even be described as seeking 'brownfield only' growth).

9.48 **Firstly**, as has been discussed, under higher growth scenarios there could be a risk of the homes not delivering as anticipated, leading to issues in respect of meeting locally arising housing needs (also wider issues around delivering the committed housing land supply trajectory at the Bucks scale, although this is less of a 'housing' issue, because the presumption in favour of sustainable development could, or would, come into force to avoid a housing shortfall).

9.49 For example:

- Redevelopment of Albany Yard is dependent on a new theatre site.
- Development of the car park sites is dependent on new multistorey car parking capacity being in place, and at least one of the sites (Water Meadow) is subject to constraints that could prove a barrier to deliver. The plan explains: *"Between the three locations it is considered it may be possible to replace the spaces in full, but if not then the delivery of one or more of those Key Regeneration Sites will have to await another solution."*
- More broadly, all of the sites are associated with complexities / delivery challenges that are typical of urban redevelopment sites, including multiple land ownership, existing leases and a need to factor in current (and potential alternative future) use values when considering development viability. Several of the policies proposed through the Neighbourhood Plan could also have viability implications, e.g. the proposed policy on urban greening, although this is uncertain.¹² Another uncertainty that leads to potential delivery risk is around the Chilterns Beechwoods SAC.

9.50 Viability and wider deliverability concerns are greatly reduced on the basis of an assumption that NDOs would be in place; however, there are uncertainties around the NDO strategy (including relating to the potential need for Environmental Impact Assessment, EIA, which could prove an involved exercise). A further consideration is that delivery risk will be reduced if there is a clear and early steer from Bucks Council that the Local Plan will not support or limit greenfield expansion, but it is not known if this will be the case.

9.51 **Secondly**, whilst housing mix is being very carefully considered through the NDO / design code process, it is inherently the case that greenfield sites are associated with greater potential to deliver new family homes with gardens.

9.52 **Thirdly**, challenging development viability can, and likely would, limit the potential to affordable housing in line with established policy. In practice, this could mean that the proportion of new homes delivered as affordable is less than the policy intent and/or there is a focus on shared ownership affordable housing, rather than affordable or social rented affordable housing.

¹² The plan explains: "... there is a premium on making a step change in its climate resilience. It is therefore reasonable to adopt a these UGF targets and, given land values and the positive approach taken to enabling new development, there is no reason to believe that the target will undermine the viability of new developments."

Thematic policies

- 9.53 Policy 15 (Affordable housing) sets out the affordable housing requirements of all housing schemes. Clause A brings policy into line with the NPPF and First Homes policies that post-date that strategy. Clause B sets out the default tenure mix as evidenced by the Chesham Housing Needs Assessment (HNA), taking into account the obligation that at least 25% of the affordable homes are delivered as the First Homes product, per the Written Ministerial Statement and Planning Practice Guidance of 2021. The HNA demonstrates that the maximum discounted rate of 50% is justified and viable in Chesham.
- 9.54 Importantly, clause C makes provision for proposals that cannot meet the requirements of clause A. Viability work undertaken for the NDO Design Code Site Masterplans indicates that a combination of abnormal costs in redeveloping those brownfield sites and established use values would render schemes unviable at the normal clause A rate.
- 9.55 Clause D seeks to encourage proposals in the town to make more efficient use of its existing affordable housing estate. There are many sites of a variety of sizes across the town that were built at low densities or with now unusable garage courts or parking areas, and which are owned by housing associations.
- 9.56 The plan explains:

“With the likely effect that the operation of clause C will lead to a smaller proportion of new homes being delivered as affordable homes, it is especially important that opportunities to deliver new affordable homes elsewhere in the town are realised.”

Conclusion

- 9.57 The key point to note is that there are delivery risks associated with urban redevelopment / regeneration, such that there is a need to take a conservative approach when determining the number of homes that, it can be assumed, will be delivered in practice (recognising that the Buckinghamshire Local Plan will need to be developed with clarity on this matter). Delivery risks are greatly reduced on account of the Chesham Design Code and the proposed development management policy framework, but there remains uncertainty regarding the potential to bring forward one or more NDOs. Finally, it is important to recognise that it can and likely will be challenging to bring forward affordable housing in line with policy requirements/ambitions. Greenfield sites are typically much better suited to delivering policy compliant affordable housing. Broadly **neutral effects** are predicted.

Land

Spatial strategy

- 9.58 There is a clear case for minimising pressure on the productive agricultural land that surrounds the town. The nationally available ‘provisional’ dataset shows all land surrounding the town to be of ‘grade 3’ quality, such that it may or may not be ‘best and most versatile’, which the NPPF classes as land that is of grade 1, grade 2 or grade 3a quality. No land surrounding the town has been surveyed in detail to establish agricultural land quality.

9.59 However, again, it is important to say that over-reliance on brownfield sites could be counter-productive, from a perspective of seeking to avoid loss of sensitive greenfield land, if the homes do not come forward as expected leading to pressure on the Buckinghamshire housing land supply position.

Thematic policies

9.60 No policies are specifically focused on this topic.

Conclusion

9.61 There is support for the strategy (despite risks and uncertainties), however, benefits are of limited significance, hence **neutral effects** are predicted.

Landscape

Spatial strategy

9.62 There is a very clear need to avoid pressure on the Chilterns AONB, and even land to the east of the town that falls outside of the AONB is associated with clear landscape sensitivity. Chesham is very strongly associated with growth along valleys that are also historic transport corridors, hence there is an inherent risk of problematic 'sprawl'. Raised ground has clear landscape sensitivity, and along the valleys / transport corridors outside the town are numerous villages, hamlets and farmsteads, often with distinct historic character, where there is a clear argument for avoiding coalescence.

9.63 However, again, it is important to say that over-reliance on brownfield sites could be counter-productive, from a perspective of seeking to avoid loss of sensitive greenfield land, if the homes do not come forward as expected leading to pressure on the Buckinghamshire housing land supply position.

Thematic policies

9.64 See discussion regarding character area and design code focused policies.

Conclusion

9.65 There is support for an urban focused housing growth strategy that reduces pressure for greenfield urban expansion. However, again, it is important to be clear that there are risks and uncertainties associated with the strategy, which require further consideration ahead of plan finalisation, and it may also be for Bucks Council to take a view through the Local Plan process regarding the number of homes that can be assumed to come forward in the Chesham urban area in the plan period. On balance **moderate or uncertain positive effects** are predicted.

Transport

Spatial strategy

9.66 Key aims of the proposed strategy are to:

- Reduce problematic HGV traffic through the town, with industry and storage/ logistics instead concentrated at the edge of the town, directly on the A416.

- Support population growth locally in proximity to the town centre and train station, supporting modal shift away from the private car and, in turn, supporting the achievement of transport and climate change mitigation / decarbonisation objectives (and supporting / boosting the town centre).
- Support mixed-use developments to deliver/support new local shops, services and facilities in the town's suburban areas to give those communities options to walk or cycle rather than having to rely on cars.

9.67 However, there is also a need to recognise that concentrating housing growth in and around the town centre could potentially lead to certain challenges in respect of avoiding traffic congestion. Also, large urban extensions can often deliver targeted new or upgraded transport infrastructure in line with strategic objectives (e.g. in line with the emerging Bucks Local Transport Plan 5).

9.68 There are also some outstanding questions regarding the potential to deliver new multistorey carparks in support of growth, as discussed above.

Thematic policies

9.69 See discussion under other topic headings above.

Conclusion

9.70 There is support for the strategy, but there is a need for further work to address risks and uncertainties. Broadly **neutral effects** are predicted.

Water

Spatial strategy

9.71 Both water supply and wastewater / water quality are significant issues locally.

9.72 With regards to water supply, this is a larger-than-local issue, being addressed by Affinity Water's Water Resource Management Plan (2019).

9.73 With regards to wastewater / water quality, there is little reason to suggest that the proposed strategy would lead to a high growth strategy for Chesham that puts pressure on Chesham Sewage Treatment Works (located on the River Chess close to Latimer). However, there is uncertainty ahead of capacity at the treatment works (in terms of hydraulic capacity and/or capacity of the receiving water course during periods of low flow) being examined further, likely through a Water Cycle Study for Buckinghamshire. It is noted that a national mapping resource shows the treatment works to have discharged raw sewage into the Chess on two occasions in 2022, which is not necessarily indicative of a particular issue in the national context.

9.74 Another issue can be the local sewer network, and this can be a particular constraint to growth within urban areas.

9.75 Water companies value early certainty on growth strategy, and can prefer a concentration of growth, from a perspective of early and effective planning for water infrastructure (treatment works and sewers), but there is no reason to suggest that Scenario 4 gives rise to a significant concern.

Thematic policies

9.76 Policy 16 deals with the sewer network (see discussion under 'Flood risk').

Conclusion

9.77 The Environment Agency and Affinity Water will wish to comment further through the consultation, but broadly **neutral effects** are predicted.

Conclusions on the draft plan

9.78 The appraisal above predicts '**moderate or uncertain positive effects**' in terms of climate change mitigation, communities and landscape objectives, and broadly **neutral effects** under other topic headings. These predicted positive effects account for the merits of the proposed broad spatial strategy taken into account alongside the Chesham Design Code and the proposed suite of development management policies. The appraisal does not predict negative effects under any of the topic headings; however, it is important to recognise that there are a range of uncertainties, risks and potential drawbacks associated with the proposed strategy. Concerns are primarily associated with a risk that the proposed homes will not delivering as anticipated. Concerns can and likely will be reduced through further work, accounting for consultation responses received, and there is a particular need to progress one or more Neighbourhood Development Orders (NDOs).

Part 3: What are the next steps?

10. Next steps

Plan finalisation

- 10.1 This Environmental Report is published for consultation alongside the draft ('pre-submission') version of CNP. As discussed in Section 1, the aim of this report is to inform the consultation and subsequent plan finalisation.
- 10.2 Following the consultation the plan will be updated for submission. The Environmental Report will be updated only if necessary.
- 10.3 After being submitted to Buckinghamshire Council, there will be a further opportunity for consultation (Regulation 16 'Publicity'). It will then be for an Independent Examiner to consider consultation responses received as part of an examination process focused on testing whether the CNP meets the Basic Conditions for Neighbourhood Plans and confirming that it is in general conformity with higher level policy.
- 10.4 If the independent examination is favourable, the CNP will be subject to a referendum. If more than 50% of those who vote agree with the CNP, then it will be 'made'. Once made, the CNO will become part of the Development Plan for Buckinghamshire.

Monitoring

- 10.5 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report.
- 10.6 It is anticipated that monitoring of effects of the CNP will be undertaken by Buckinghamshire Council. The SEA has not identified any potential for significant negative effects that would require closer monitoring, led by the Town Council. However, as discussed, there are potentially risks associated with housing delivery that could require close monitoring.

Appendices

Appendix I: Legal checklist

As discussed in Chapter 1 above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. Table AI.1 links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table AI.2 explains this interpretation. Table AI.3 identifies how and where within this report the requirements have/ will be met.

Table AI.1: Questions answered by this report, in-line with an interpretation of regulatory requirements

	Questions answered	As per regulations, the report must include...	
Introduction	What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes 	
	What's the SEA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SEA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan 	
Part 2	What are the SEA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan 	
Part 3	What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged 	

Table AI.2: Interpretation of the regulations

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Table AI.3: ‘Checklist’ of how (throughout the SEA process) and where (within this report) regulatory requirements are met

Regulatory requirement	How requirement is met
A) The Environmental Report must present certain information	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 (‘What is the plan seeking to achieve’) presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report. The ‘SEA framework’ – the outcome of scoping – is presented within Chapter 3.
3. The environmental characteristics of areas likely to be significantly affected;	
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The SEA framework is presented within Chapter 3 (‘What is the scope of the SEA’). With regards to explaining “ <i>how...considerations have been taken into account</i> ”, Chapter 7 explains the Town Council’s ‘reasons for supporting the preferred approach’, i.e. explains how/ why the preferred approach is justified in light of alternatives.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapter 6 presents alternatives assessment findings (in relation to housing and employment, which is a ‘stand-out’ plan policy area). Chapters 9 presents an assessment of the draft plan. With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g. timescale.

Regulatory requirement	How requirement is met
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The assessment highlights certain tensions with environmental and wider sustainability objectives, which should be actioned when finalising the plan.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 4 and 5 deal with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options ('scenarios'). Also, Chapter 7 explains the Town Council's reasons for selecting the preferred option (in-light of alternatives).
9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 11 presents measures envisaged concerning monitoring.
10. A non-technical summary of the information provided under the above headings	Presented at the start of this report
B) The Report must be published for consultation alongside the draft plan	
Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	At the current time, this report is published for consultation alongside the draft plan, in order to inform the consultation.
C) The report must be taken into account, alongside consultation responses, when finalising the plan	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	This report, and consultation responses received, will be taken into account when finalising the plan.