

**Great Dunmow Neighbourhood Plan**

**Strategic Environmental Assessment: Major Modifications Addendum**

February 2016

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# 1 Introduction and Methodology

## Background

Following formal consultation on the Great Dunmow Neighbourhood Plan 19 September to 31 October 2015 it has been necessary to set out modifications to the Plan in order to factor in any representations made during the consultation period.

These modifications are subject to Strategic Environmental Assessment (SEA) in this report, in so far as they may alter those impacts highlighted in the SEA that accompanied the Pre-Submission consultation version of the Great Dunmow Neighbourhood Plan.

## Strategic Environmental Assessment (SEA)

The requirement for Strategic Environmental Assessment (SEA) emanates from a high level national and international commitment to sustainable development. The most commonly used definition of sustainable development is that drawn up by the World Trade Commission on Environment and Development in 1987 which states that sustainable development is:

*'development that meets the needs of the present without compromising the ability of future generations to meet their own needs.'*

The European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment" (the 'SEA Directive') was adopted in June 2001 with a view to increase the level of protection for the environment, integrate environmental considerations into the preparation and adoption of plans and programmes and to promote sustainable development.

It requires a Strategic Environmental Assessment to be carried out for all plans and programmes which are:

*'subject to preparation and/or adoption by an authority at national, regional or local level or which are prepared by an authority for adoption, through a legislative procedure by Parliament or Government, and required by legislative, regulatory or administrative provisions'*.

The few exceptions are detailed in Article 3 (8, 9) of the SEA Directive. The aim of the SEA is to identify potentially significant environmental effects created as a result of the implementation of the plan or programme 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'*

as specified in Annex 1(f) of the Directive. The Directive was transposed into English legislation by the Environmental Assessment of Plans and Programmes Regulations 2004, which came into force on 21 July 2004.

## The aim and structure of this report

This report forms part of the SEA of the Great Dunmow Neighbourhood Plan. It should be read alongside the SEA Environmental Report of the Pre-Submission Great Dunmow Neighbourhood Plan that was made available for consultation in September and October 2015. Sustainability impacts identified in this report represent changes to the aforementioned SEA Environmental Report.

Numerous modifications to the Plan are proposed. These modifications are a result of recommendations made in the consultation period. Modifications at this stage in the process could change the direction of the Plan; therefore it is essential that the modifications are also subject to SEA.

This report is split into three sections. The first section screens those modifications to the elements of the Plan subject to appraisal in the original SEA Environmental Report. Where this occurs, this

document sets out the necessary changes to the original SEA Environmental Report to reflect the modification. Where required the temporal, secondary, cumulative and synergistic impacts of all changes will be highlighted if and where they occur.

It should be noted that many of the modifications are minor. The National Planning Practice Guidance is clear that changes that are not significant will not require further SEA work. The guidance defines significant changes as those that 'substantially alter [...] and [are] likely to give rise to significant effects'. Nevertheless, minor changes have also been screened for significant impacts, and appear in this report.

## **2 Main Modifications to the Great Dunmow Neighbourhood Plan**

### **SEA Screening Process and Amendments to the SEA Environmental Report**

The modifications to the Plan which are relevant to the original SEA Environmental Report have been screened to identify whether or not they will have significant sustainability effects that would change those identified in the SEA Environmental Report for the Pre-Submission Plan.

The following table explores the sustainability effects of those modifications to the Plan chronologically. The final column notes whether changes to the SEA are subsequently required, and documents and explains any amendments to the SEA Environmental Report in response to each modification where necessary.

Modifications can be identified by the following:

- Deletions: ~~strikethrough~~
- Additions: underlined

**Table 1: Modifications to the Great Dunmow Neighbourhood Plan and impact on accompanying SEA Environmental Report**

Ref.	Chapter / para / page no.	Modification	Impact on SEA
M1	Policy DS1	The Town Development Area has been revised to include Ongar Road North and Ongar Road South	The Town Development Area has been revised to reflect the consent of planning permission for the development proposals on Ongar Road North and Ongar Road South. There will be no additional impacts on the SEA as a result of this modification.
M2	Policy DS2	<p>First paragraph amended to::</p> <p>“This site is released for the development of 100 residential units if Helena Romanes’ School relocates to another site <u>appropriately located to serve the growing population of Great Dunmow</u> <del>within the Great Dunmow parish</del>, and the site is no longer required for education use. All financial planning gain from this site is reserved to assist Helena Romanes’ School’s chosen relocation <u>site</u>.”</p> <p>First bullet point amended to: Residential development (for 100 units) on the existing HRS site should: “• Be an enabling development, in order to part fund the development of a new secondary school <u>appropriately located to serve the growing population of Great Dunmow</u> , <u>for example</u>, on land adjacent to Buttleys Lane, South of Stortford Road;”</p> <p>Fourth bullet point amended to:</p> <p>“Include a <del>substantial 20m</del> landscaped buffer (incorporating native trees and hedgerows, and a shrub land area for wildflowers designed so that it can also be used as an informal walkway adjoining the existing properties of Parsonage Downs – <del>this buffer should include a buffer of native trees</del></p>	<p>This change has been made to improve clarity. No material change and therefore no impacts on the SEA.</p> <p>As above</p> <p>This change makes the policy less prescriptive but requires the achievement of same outcome. No additional impacts</p>

Ref.	Chapter / para / page no.	Modification	Impact on SEA
		<p><del>and hedgerows, and a shrub land area for wildflowers designed so that it can also be used as an informal walkway.</del> The dual purpose of this buffer is firstly to add value to the wildlife corridor, and secondly to shield the existing properties from new development;</p> <p>Fifth bullet point amended to:</p> <p>Arrange houses so that they centre on <del>substantial</del> open green spaces, which also connects to a green-strip pathway around the perimeter; “</p>	on the SEA as a result of this modification.
M3	DS3	Correction made to this site allocation to include both the housing site (south of Stortford Road) and the housing site (land adjacent to Buttleys Lane).	Correction of a previous error. No additional impact on the SEA as a result of this modification.
M4	DS8	<p>Additional bullet point inserted to state:</p> <p>“access to be provided into the existing public open space on the eastern and western side of the River Chelmer”</p>	<p>This bullet point was in the withdrawn local plan and reflects the expectations from a development proposals coming forward on this site. The inclusion of this bullet point reinforces positive impacts recorded in the SEA of the pre submission plan against the SEA objective 6) “To improve health and ensure appropriate provision for open space and recreational facilities”. However, no additional impact on the SEA as a result of this modification.</p>
M5	DS9	<p>Residential development proposals which are accompanied by a Building for Life 12 assessment <del>and which meet the following scores will be</del> <u>is strongly encouraged</u>. Supported <u>particularly where</u></p> <ul style="list-style-type: none"> <li>• Developments proposals score as many greens as possible</li> </ul>	<p>The wording has been amended here in order to reflect the changes in place nationally since the 25 March 2015 Written Statement to Parliament by Eric Pickles. This specified that “<i>local planning authorities and qualifying bodies preparing neighbourhood plans should</i></p>

Ref.	Chapter / para / page no.	Modification	Impact on SEA
		<ul style="list-style-type: none"> <li>A GREEN score <u>is achieved</u> against criteria 1 (Connections), 4 (Meeting Local Housing Requirements), 5 (Character) and 6 (Working with the site and its Context); <del>On all the remaining criteria an AMBER score will only be acceptable where it is accompanied by a clear justification in terms of local circumstances or viability explaining why a green score cannot be achieved.</del></li> </ul> <p>A self-assessment by developers will be submitted with either a full planning application or reserved matters application in cases where outline planning permission has been granted. <del>as part of a planning application at either the Details Following Outline stage or Full planning permission stage of securing planning permission. Review of this self-assessment document will inform decisions surrounding the granting or refusal of planning permission. It will be insufficient only to consider this document in the latter stages of planning and proposal. BfL12 must</del> should be integral to the planning process from the beginning.</p>	<p><i>not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings.”</i></p> <p>This change does result in an impact on the SEA. The previous positive impact recorded should all be changed to uncertain as it will be uncertain whether or not developers will abide by these principles.</p>
M6	DS10	<p>Policy: DS10: The Case for Space amended</p> <p><del>“Development proposals will be required</del> <u>strongly encouraged</u> to meet, and will be encouraged to exceed, the minimum space standards set out in <u>the Nationally Described Space Standards published by DCLG in 2015.”</u> <del>good practice guidance prepared by the Royal Institute of British Architects (RIBA) in its 2011 publication The Case for Space: The Size of England’s New Homes and outlined in the justification to this policy. Where standards exist as determined by other bodies such as Essex County Council, and which exceed the Case for Space standards, these higher standards must be implemented.</del></p>	<p>The wording has been amended here in order to reflect the changes in place nationally since the 25 March 2015 Written Statement to Parliament by Eric Pickles. This specified that <i>“local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings.”</i></p>



Ref.	Chapter / para / page no.	Modification	Impact on SEA
			This change does result in an impact on the SEA. The previous positive impact recorded against SEA objective 7 should be changed to uncertain.
M7	DS13	<p>Policy: DS13: Rendering, Pargetting and Roofing amended:</p> <p>New developments should where possible be constructed with tiled or slate roofing, and proposals in which each unit is either wholly rendered or wholly brick, <u>Major residential schemes should have with a mixture of rendered and brick units on development sites over fifty units, will be permitted.</u> This policy supports proposals for pargetting on new developments, using traditional Essex and Great Dunmow themes.</p>	These changes have been made in order to improve clarity. No impact on the SEA.
M8	DS15	<p>Policy: DS15: Local Housing Needs</p> <p>All major residential schemes (10 units and above) are to provide a choice of housing which is informed by an up to date housing needs assessment. Particular regard should be had to needs of those trying to get on to the housing ladder, the need of young families as well as needs of a growing older population.</p> <p>Unless justified through an up to date housing needs assessment:</p> <ul style="list-style-type: none"> <li>• at least <del>76%</del> of the total number of units provided <del>are</del> should be 3 bedrooms or fewer</li> <li>• <del>and</del> at least 19% <u>of the total number of units provided are should be</u> 2 bedrooms or fewer, <del>unless</del></li> </ul> <p>housing needs have been demonstrated to be different through an up to date housing needs assessment. 5% on all schemes above 20 units are to be bungalows.</p>	These changes have been made to improve accuracy and to reflect the most up to date available information on housing needs in the district. No impact on the SEA.

Ref.	Chapter / para / page no.	Modification	Impact on SEA
M9	SOS2	Policy has been amended to remove the 30 unit threshold and instead apply it to major residential development proposals.	This changes has been made to improve clarity. No impact on the SEA
M10	GA1	<p>The following sentence is added to the end of the first paragraph:            Consultation with Great Dunmow Town Council and other relevant stakeholders such as the Flitch Way Connection group must be undertaken prior to submission of the planning applications.            1<sup>st</sup> bullet point amended with:</p> <p>Footpaths (see map) must have, <u>where practical</u>, permissible cycling provision and signposting.</p> <p>Following paragraph added to end of the policy            “All strategic development proposals will require the submission of a pedestrian, cycle and equestrian audit.”</p>	These changes will result in no impact on the SEA assessment.
M11	New policy	<p>New policy GA3 Public Trans port</p> <p>GA3 Public Transport            New developments should be integrated into the local bus network and appropriate public transport infrastructure and support for services will be sought from developers to ensure this.</p>	This is a new policy taken from the supporting text as recommended by County Council at pre submission consultation stage. This policy needs to be subject to SEA appraisal.
M12	E2	<p>Policy is amended and now begins with :</p> <p>“Where planning permission is required, Pproposals.</p>	This improves clarity and will result in no impact on the SEA assessment.
M13	Policy HE11	<p>3<sup>rd</sup> bullet point amended to read;            There should be adequate parking spaces for staff and patients.            Specific standards to be determined following consultation with</p>	This change reduces the prescriptive nature of the policy and brings the requirements more in line with needs of

Ref.	Chapter / para / page no.	Modification	Impact on SEA
		<p>stakeholders (Great Dunmow Town Council, patients) and having regard to the findings of completed transport assessment.</p> <p>All medical facilities should provide at least two car parking spaces for the exclusive use of patients per doctor or nurse's office or room (used for seeing patients) which will be or can reasonably be expected to be provided within the building;</p>	the health providers. This change will have no impact on the SEA assessment.
M14	Policy HE12	<p>A new bullet point is added to top of the list:</p> <ul style="list-style-type: none"> <li>- Any site for a new school must comply with ECC's site suitability criteria checklist as detailed in ECC's "Education Contributions Guidelines Supplement" to its "Developers' Guide to Infrastructure Contributions", or its successor document." </li></ul>	This change brings the policy in line with needs of education providers. This change will have no impact on the SEA assessment
M15	HE14	Accepted. The following paragraph is added to the end of the policy "Any converted site should comply with the minimum recommended building areas and outdoor spaces for schools as outlined in the Department for Education's Building Bulletin 103 – Area guidelines for mainstream schools, or its successor document".	This change brings the policy in line with needs of education providers. This change will have no impact on the SEA assessment

### 3 Policies where SEA assessment is altered.

MODIFICATION 5: Policy DS9 Amended Policy:

Residential development proposals which are accompanied by a Building for Life 12 assessment ~~and which meet the following scores will be~~ is strongly encouraged. Supported particularly where

- Developments proposals score as many greens as possible
- A GREEN score is achieved against criteria 1 (Connections), 4 (Meeting Local Housing Requirements), 5 (Character) and 6 (Working with the site and its Context);
- ~~On all the remaining criteria an AMBER score will only be acceptable where it is accompanied by a clear justification in terms of local circumstances or viability explaining why a green score cannot be achieved.~~

**A self-assessment by developers will be submitted with either a full planning application or reserved matters application in cases where outline planning permission has been granted. as part of a planning application at either the Details Following Outline stage or Full planning permission stage of securing planning permission. Review of this self-assessment document will inform decisions surrounding the granting or refusal of planning permission. It will be insufficient only to consider this document in the latter stages of planning and proposal. BfL12 must should be integral to the planning process from the beginning.**

#### Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	/	/	0	/	/	0	/	/	0
Medium Term	/	/	0	/	/	0	/	/	0
Long Term	/	/	0	/	/	0	/	/	0

#### Significant Effects

There will be no significant effects arising from the changes made to this policy. However, the previously recorded minor positive effects for Policy DS9: Building for Life will not be so forthcoming as a result of the now. This is because it is uncertain whether developers will undertake the self assessment now that it is not a requirement of planning permission being granted.

#### Temporal Effects

There are no temporal effects resulting from this change to the plan.

**Secondary, Cumulative and Synergistic Effects**

There will be no secondary, cumulative or synergistic effects as a result of this change to the Plan.

**Alternatives Considered**

A reasonable alternative to this policy would be to make the Building for Life self assessment a requirement of planning permission and this alternative was considered the preferred option in the pre submission plan. However that is now not possible following 25 March 2015 Ministerial Statement *“local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings.”*

**Proposed Mitigation Measures / Recommendations**

No proposed mitigation measures / recommendations have been highlighted.

**MODIFICATION 6 :Policy DS10 (Modification 6)**

Policy: DS10: The Case for Space amended

“Development proposals will be ~~required~~ strongly encouraged to meet, and will be encouraged to exceed, the minimum space standards set out in the Nationally Described Space Standards published by DCLG in 2015. ~~good practice guidance prepared by the Royal Institute of British Architects (RIBA) in its 2011 publication The Case for Space: The Size of England’s New Homes and outlined in the justification to this policy. Where standards exist as determined by other bodies such as Essex County Council, and which exceed the Case for Space standards, these higher standards must be implemented.~~

**Impact on SEA Objectives**

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	0	0	0	0	0	0	/	0	0
Medium Term	0	0	0	0	0	0	/	0	0
Long Term	0	0	0	0	0	0	/	0	0

There will be no significant effects arising from the changes made to this policy. However, the previously recorded minor positive effect for Policy DS10: The Case for Space will not be so forthcoming as a result of the now. This is because it is uncertain whether developers will design to the specified internal space standards now that it is not a requirement of the policy.

**Temporal Effects**

There are no temporal effects resulting from this change to the plan.

## Secondary, Cumulative and Synergistic Effects

There will be no secondary, cumulative or synergistic effects as a result of this change to the Plan.

## Alternatives Considered

A reasonable alternative to this policy would be to make the standards a requirement of planning permission and this alternative was considered the preferred option in the pre submission plan. However that is now not possible following 25 March 2015 Ministerial Statement *“local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings.”*

## Proposed Mitigation Measures / Recommendations

No proposed mitigation measures / recommendations have been highlighted.

## MODIFICATION 11 : New Policy GA3

### GA3 Public Transport

New developments should be integrated into the local bus network and appropriate public transport infrastructure and support for services will be sought from developers to ensure this

## Impact on SEA Objectives

	SEA Objectives								
	1	2	3	4	5	6	7	8	9
Short Term	0	0	0	0	+	0	0	0	0
Medium Term	0	0	0	0	+	0	0	0	0
Long Term	0	0	0	0	+	0	0	0	0

The wording of this policy was previously in the supporting text of the plan. Without this policy being in place, the aspiration and principle of public transport infrastructure improvements being provided alongside new development is nevertheless in place. Policy GEN6 of the Local Plan for instance states for example that *“Development will not be permitted unless it makes provision at the appropriate time for community facilities, school capacity, public services, transport provision, drainage and other infrastructure that are made necessary by the proposed development. In localities where the cumulative impact of developments necessitates such provision, developers may be required to contribute to the costs of such provision by the relevant statutory authority.”*

This policy nevertheless, does go further and useful provides the locally specific context; public transport provision within the NP area is limited to the local bus network (rather than train) and this is therefore the specific area where public transport improvements are required alongside population growth. The policy has been recommended for inclusion in the neighbourhood plan by the Essex County Council; the relevant statutory authority for transport provision.

The addition of this policy therefore has minor positive effects on the following SA objectives 5 (To ensure access to key services and encourage the use of sustainable methods of travel).

### **Temporal, Secondary, Cumulative and Synergistic Effects of the Modifications**

There will be no temporal, secondary cumulative or synergistic effects resulting from the modifications made to the Plan

### **Secondary, Cumulative and Synergistic Effects**

There could be knock on indirect positive impacts on air pollution but this impact is less clear as emissions from buses may negate any positive benefit arising from reduction in car movement.

### **Alternatives Considered**

There are no alternatives identified other than not having the policy at all and that has been appraised via the pre submission neighbourhood plan.