

Strategic Environmental Assessment (SEA) for the Chesham Neighbourhood Plan

Environmental Report Update

June 2024

Quality information

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Revision History

Revision	Date	Details	Name	Position
1	31.05.24	Draft	Mark Fessey	Associate Director
2	31.05.24	Draft Review	Neil Homer	Lead Chesham Neighbourhood Plan consultant (Oneill Homer), for and on behalf of Chesham Town Council
3	04.06.24	Final Report for Locality Review	Mark Fessey	Associate Director

Prepared for:

Chesham Town Council and on behalf of Locality

Prepared by:

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Background

AECOM has been commissioned by Locality through the Neighbourhood Planning Technical Support to prepare a 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, once adopted, will supersede the current Local Plan for the area, which is the former Chiltern District Local Plan (1997).

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

An 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 an assessment of “the plan and reasonable alternatives” in order to inform the Neighbourhood Plan consultation. The report must essentially answer 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 Update / NTS

An Environmental Report was consulted upon alongside the Draft (‘Pre-submission’) CNP in 2023, under Regulation 14 of the Neighbourhood Planning Regulations.

At the current time an Environmental Report Update has been prepared for ‘submission’ and then ‘publication’ alongside an updated version of the Neighbourhood Plan, under Regulations 15 and 16.

The current Environmental Report Update is structured *as per* the Environmental Report (2023), and the central aim of the report is unchanged, namely to present an assessment of “the plan and reasonable alternatives” (that is fully up-to-date).

This is the Non-Technical Summary (NTS) of the Environmental Report Update.

It is structured so as to answer the three questions introduced above in turn. Firstly, there is a need to set the scene by introducing the SEA ‘scope’.

The SEA Scope

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; and
- 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:

- The Environmental Report (2023) explained how work had been undertaken to explore a 'reasonable' range of alternative approaches to addressing the matter that was, at the time, considered to be at the very core of the Neighbourhood Plan, namely allocating sites with a view to maximising the identifiable housing supply from the urban area over the plan period, in order to minimise pressure for greenfield (most of which is designated Green Belt) urban expansion through the emerging Buckinghamshire Local Plan.
- The current report aims to present up-to-date information on reasonable alternatives, recognising that the Town Council has had to modify its vision, objectives and policies in the light of consultation and ongoing engagement with key partners and stakeholders, including the local planning authority and Natural England, most notably in respect of the constraints imposed by the adopted and emerging sections of the Chiltern Beechwoods SAC Mitigation Strategy.

Exploring reasonable alternatives in 2023

Section 4 of the Environmental Report (2023) explained a focus on reasonable alternative 'growth scenarios', defined as alternative approaches to housing growth. Section 5 of the report then explained a process leading to four growth scenarios.

These scenarios were subjected to assessment under the SEA framework (Section 6), which served to highlight each as having both pros and cons. In light of the assessment, the Town Council then decided to take forward Scenario 3 (Section 7).

Specifically, the preferred approach involved 13 brownfield allocations (CHESH2) underpinned by a spatial strategy (CHESH1), plus support for wider redevelopment of brownfield sites as windfall (CHESH3).

However, a range of issues were raised through (and subsequent to) the consultation, including around the spatial strategy (including consolidating town centre carparking to free-up three carparks for development), deliverability of the proposed allocations (the proposal was to boost certainty via Neighbourhood Development Orders, NDOs, but these are no longer being progressed) and recreational pressure on the Ashridge component of the Chilterns Beechwoods SAC (there is currently a lack of Suitable Alternative Natural Greenspace, SANG, to mitigate the recreational pressure associated with population growth at Chesham).

As a result, there has been a need to modify the vision and objectives of the CNP. In particular, whilst a headline objective remains to “deliver new homes and commercial uses in the town in suitable locations as a viable alternative to continuing peripheral growth into the Green Belt and National Landscape” it is now recognised that the potential to do so is much more limited, relative to the position in 2023.

Exploring reasonable alternatives in 2024

The new proposed approach is to remove the policy setting out a spatial strategy, and to include only one policy (new policy CHESH1) promoting the beneficial redevelopment of six brownfield site opportunities with the following indicative site capacities (derived from the site masterplans in the Chesham Design Code):

- Higham Mead – 135 homes
- Townsend Road – 90 homes¹
- Chesham Business Park, off Townsend Road – 25 homes
- Cape House, Bellingdon Road – 10 homes
- Alma Road Industrial Estate – 60 homes
- Bellingdon Road and Deansway – 50 homes

These sites all featured in the Draft CNP (2023), and they all share the characteristic of comprising sites in existing industrial or commercial use. Specifically, all of the sites are currently occupied to one extent or another by Class E, B2 and/or B8 uses, albeit several are currently underused and/or part vacant.

Aligned with this, a key point to note is that five of these sites are currently designated employment sites under the current Chiltern Local Plan (1997; see Policy Map [here](#)), such that new policy CHESH1 would replace this existing designation. The one non-designated site is Townsend Road, which is occupied by Wickes and a car garage business (and is adjacent to Chesham Business Park).

Supporting residential-led redevelopment of select industrial/commercial sites was a key element of the spatial strategy proposed in 2023, aligned with a proposal to support intensification of several existing industrial sites located close to the periphery of the town (i.e. less closely associated with dense residential areas), and with relatively good access to the strategic road network.

This is a strategy that is supported by the Town Council, in light of appraisal, technical work and consultation over a number of years, with a key benefit (other than delivering homes on brownfield locations) being to reduce problematic HGV traffic and address other ‘bad neighbour’ issues.

¹ Townsend Road previously also included the Elgiva Theatre and was referred to as Albany Yd & Central Garage.

This strategy is at the heart of delivering the CNP vision and objectives at the current time. As such, there has been a need to explore the possibility of reasonable alternative approaches to achieving the vision and objectives / strategy.

Specifically, the question is whether there are any reasonable alternatives involving support for only certain of the six sites and/or support for other sites not listed (given that site capacities need not be questioned, in light of design coding).

Looking at each of the six emerging proposed CHESH1 sites in turn:

- Bellingdon Road and Deansway – is a mix of under-occupied and vacant land. It is *relatively* distant from the town centre (but still within comfortable walking distance) and there are *relatively* limited concerns in respect of problematic access or otherwise bad neighbour issues (although access is far from ideal, as Bellingdon Road is a relatively minor road). Another consideration is that redevelopment would involve a mix of uses, complimenting adjacent uses.
- Alma Road – is the other site that is slightly more distant from the town centre, but is associated with particularly challenging access, as there is regular HGV traffic along a narrow and steep residential road. There is thought likely to be good potential for the existing business to relocate to one of the nearby Economic Growth Locations proposed to be designated through new Policy CHESH2.
- The remaining four sites – are quite closely clustered in an older part of the town that is very well linked to the town centre and the A416, and all are associated with challenging access or otherwise bad neighbour issues.
 - Higham Mead is a larger site that was a focus of attention in 2023 (as one of the variables across the reasonable growth scenarios). It has been part vacant for some years, and there is strong interest in residential-led redevelopment.
 - Cape House is the most distant from the town centre (of the cluster), and there are perhaps relatively limited concerns around access / bad neighbour issues, but this is a small site that is ultimately of lesser significance.
 - The final two sites are then Townsend Road and Chesham Business Park, which are adjacent such that the potential for a coordinated high quality residential-led development benefiting from very good access to the town centre can be envisaged (also, Higham Mead is closely linked). Also, in the case of Townsend Road, there is a need to recall that it is not a designated employment site, and it is also understood that the lease for the main use onsite (Wickes) is due to expire within the next few years, which boosts the potential for redevelopment (whilst, in contrast, there is no reason to suggest any shorter term opportunity at Chesham Business Park, nor Cape House).

In short, it is difficult to pinpoint sites from the above list where support for residential-led redevelopment is more marginal.

Equally, it is difficult to pinpoint sites other than the six listed above that might be a focus of new Policy CHESH2. In 2023 there was additional support for residential-led redevelopment at Howard Industrial Estate, but the latest understanding is that it is more suited to remaining in employment use, having accounted for the range of key factors, including a higher existing employment density on the site and a location closer to the periphery of the town.

Also, for completeness, there are three further points to note regarding possible ‘additional options’. Firstly, at this stage there is no reasonable prospect of retaining a focus on town centre car parks, as per the approach of the Draft CNP (2023). Secondly, numerous other urban brownfield sites have been considered as part of the plan-making process, but none align with key criteria as per the six sites listed above, and where one key criterion is a need for policy support through the CNP in order to significantly boost the prospect of redevelopment, recognising that many or most could come forward as windfall without specific support through the CNP. Thirdly, it is important to recall that it is not within the gift of the CNP to allocate land for development within the Green Belt, which surrounds the entirety of Chesham.

The discussion above serves to indicate that it is very challenging to identify reasonable alternative growth scenarios at the current time.

Furthermore, there is another key factor to consider, which is that certainty regarding deliverability of the six sites listed above (as supported for redevelopment) has decreased since 2023. This is primarily on account of a lack of SANG capacity to mitigate recreational pressure on the Chilterns Beechwoods SAC, as discussed,² but another factor is that NDOs are no longer being progressed. NDOs were previously relied upon in 2023 as a means of generating confidence around there being a “reasonable prospect” of the allocations (as they were described at that stage) delivering new homes in the plan period.³

These issues were explored in the Environmental Report, including within Box 5.1 of that report, which introduced NDOs, and within the appraisal sections – see Box A.

Box A: Key findings from the Environmental Report (2023)

The assessment of reasonable alternative growth scenarios in 2023 served to highlight that all four scenarios were associated with pros and cons, before the Town Council responded as follows (emphasis added):

*“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... more work is required in respect of the **Chilterns Beechwoods SAC**.*

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... Whilst maximising supply of new homes within... Chesham... will minimise pressure for greenfield expansion (and also help to realise wider objectives), potential tensions... do exist, including around traffic... and **car parking**. It is also recognised that there is a need to assume supply of new homes only from those sites with strong... **deliverability** credentials, given the importance of a robust committed supply.”*

² There will likely be capacity in the relatively near future, as discussed within the Habitats Regulations Assessment (HRA) Report published at the current time, but there is currently no certainty, and the ability to deliver housing growth at Chesham is severely restricted ahead of new SANG capacity coming forward.

³ NPPF paragraph 69 explains how fundamental to the plan-led system is identifying a supply of ‘developable’ sites, which the NPPF glossary then defines as sites that (amongst other things) have a “reasonable prospect” of being delivered.

The implication of reduced delivery certainty is that the six sites should no longer necessarily be thought of as strictly ‘allocations’ in the NPPF paragraph 69 sense. Rather, the intent is simply to remove the existing employment land designation (from five of the six sites) and signal support for residential-led redevelopment.

It is recognised that this means increased pressure on the Green Belt and Chilterns National Landscape surrounding the town. However, following several years of plan-making aimed at maximising brownfield supply in Chesham the Town Council has now arrived at a point where it cannot see a way to do any more through the CNP.

This all serves to bolster the conclusion that there are **no reasonable alternatives**.

A final consideration is then SEA procedural requirements. On the one hand, there is a requirement for the Env Report to present an assessment of reasonable alternatives. However, on the other hand, reasonable alternatives must be defined having regard to the likelihood of significant effects.⁴ In this regard, it is clearly the case that reduced likelihood of sites being redeveloped / delivering housing at the expense of employment land leads to a reduced likelihood of significant effects.⁵

SEA findings at this stage

The final task is to assess the Submission CNP under the SEA framework.

Under each of the topic headings the aim is to reach a conclusion on the effects of the CNP as a whole, but there is a particular focus on the ‘spatial strategy’ as understood from CHESH1 and CHESH2. In summary, this involves signalling support for residential-led redevelopment of six brownfield sites currently in employment/commercial use (Policy CHESH1) and then identifying five ‘Economic Growth Locations’ that should be protected and where there is support for intensification of employment uses (Policy CHESH 2).

The appraisal conclusion also accounts for the other CNP policies, namely:

- CHESH3: Town Centre
- CHESH4: Convenience Shops & Local Services
- CHESH5: Chesham Design Code
- CHESH6: Design Character Areas
- CHESH7: Local Heritage Assets
- CHESH8: Chesham Green Infrastructure Network
- CHESH9: Local Green Spaces
- CHESH10: Urban Greening
- CHESH11: Affordable Housing
- CHESH12: Flood Risk & Mains Sewage
- CHESH13: Residential Parking Standard
- CHESH14: Chiltern Beechwoods Special Area of Conservation

⁴ The Government’s Planning Practice Guidance (PPG) is clear that SEA should focus only significant effects. Also, the PPG explains that neighbourhood plans should only be subject to SEA where there is potential for significant effects, and that a key consideration when ‘screening’ neighbourhood plans in this regard is whether a plan will “allocate sites for development”.

⁵ A further consideration is that this current report is an Environmental Report Update. The Environmental Report (2023) did present an appraisal of reasonable alternatives, which served a clear function at the time (but is now out of date).

Accessibility (to community infrastructure)

The **context** is a need to direct growth to areas that are accessible to existing community infrastructure (with capacity), which primarily means the town centre, and/or to direct growth in such a way that growth brings with it targeted investment in new or improved community infrastructure, ideally to the benefit of the existing community ('planning gain').

With regards to the **spatial strategy**, a key aim is to support population growth in proximity to the town centre, and the CHESH1 sites all perform well in this regard, particularly the three in closest proximity. There could also be some potential to deliver new community infrastructure (e.g. the three closely related sites), but this is uncertain, and anything that is delivered would likely be of limited significance. Larger greenfield urban extensions can often deliver new community, but this is inherently more challenging when dealing with brownfield sites where viability can be challenging, including after taking account of the value of existing uses.

In **conclusion**, whilst delivery uncertainties mean that there can be little certainty that the spatial strategy will lead to a significant effect on the baseline (i.e. a situation whereby the existing policy framework remains in place until such time as the Bucks Local Plan is adopted), the spatial strategy is broadly supported, as are the wider policies within the plan, most notably CHESH3 (Town Centre) and CHESH4 (Convenience Shops & Local Services). Whilst equivalent appraisal in 2023 raised some concerns regarding town centre car parking, these concerns no longer apply, and so it is possible to predict a **limited or uncertain positive effect**.

Air quality

The **context** is that air quality is a significant constraint in Chesham, given the topography and the busy A416 being a historic route closely associated with residential neighbourhoods and community uses. In particular, it is important to note an extensive air quality management area (AQMA) at Broad Street in the vicinity of the town centre. However, air quality is improving nationally due to the switch-over to electric vehicles (albeit particulates pollution is set to remain an issue, including as a result of HGV movements, which are a particular issue in Chesham).

With regards to **spatial strategy**, there are clear transport and, in turn, air quality arguments for supporting significantly fewer HGV, business vehicle and car trips from the six CHESH1 sites, all of which lie close to the Broad Street AQMA. New homes on the CHESH1 sites would include car parking spaces, but there would be good potential to reach key destinations by walking, cycling or public transport.

In **conclusion**, the spatial strategy is broadly supported, and concerns regarding town centre car parking have reduced (which could have had implications for traffic flow and, in turn, air quality), and so it is now possible to predict a **limited or uncertain positive effect**.

Biodiversity

The **context** is a wide range of biodiversity sensitivities within and around the town, including areas of locally and nationally designated habitat. The internationally important Chilterns Beechwoods are also a constraint, despite being located some distance away (Ashridge), because a key 'impact pathway' is recreational pressure.

With regards to **spatial strategy**, 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. Also, all of the CHESH1 sites are associated with very low biodiversity value, and their redevelopment in line with the Design Code and Urban Greening Factor policies of the plan, and in accordance with Biodiversity Net Gain obligations, will lead to a significant boost to biodiversity in the Chesham urban area.

However, on the other hand, the sites are clearly unable to deliver on-site Suitable Alternative Natural Greenspace (SANG) to mitigate recreational pressure, in this case on the Chilterns Beechwoods SAC (specifically, the issue is with the Ashridge Common and Woods SSSI component of the SAC). The implication is a need to make a financial contribution to strategic SANG elsewhere (also towards Strategic Access Management and Monitoring, SAMM), with implications for development viability (given other policy requirements). Also, it is the case that there is currently a lack of strategic SANG capacity, although that is set to change (as discussed), and Policy CHESH14 is clear that there must be SANG in place prior to development.

A further consideration is the River Chess, which is a key sensitivity within the urban area. In this respect it is likely that surface water run-off from some of the sites adjoining Vale Brook, which is a tributary to the river, may contain contaminants, either from past or present industrial uses. It is therefore possible to suggest that residential-led redevelopment of existing employment sites in proximity to the river may lead to biodiversity improvement, albeit this is uncertain.

In **conclusion**, there is support for the spatial strategy, and a further consideration is three further policies that are strongly supportive of biodiversity objectives, and which have been bolstered since 2023, including accounting for consultation responses. Concerns around a lack of SANG capacity have clarified since 2023, but there is a clear policy commitment to not delivering development ahead of securing SANG capacity (Policy CHESH14). As such, it is possible to predict a **limited or uncertain positive effect**.

Climate change adaptation (flood risk)

The **context** is wide ranging climate change adaptation consideration of some relevance, but flood risk as an issue of key importance.

Fluvial flood risk always warrants being a focus, but surface water flood risk is also a key issue in Chesham, given the town's close association with a series of 'dry valleys'. A key surface water flood risk zone is associated with the Vale Brook culvert, which has the capacity to drain the volumes of runoff anticipated from a rainfall event that has between a 1 in 10 and a 1 in 30 chance of occurring annually.

There is a correlation between land historically having been seen as appropriate for a low intensity use (industry, commerce, car parking) and flood risk, and Chesham is no exception. There is clearly a need to take a sequential approach to avoiding flood risk ahead of mitigation where possible. However, residential-led intensification of brownfield sites affected by flood risk is not uncommon nationally, given improving practice in respect of mitigation, including sustainable urban drainage systems.

With regards to **spatial strategy**, all of the CHESH1 sites are all located outside of the fluvial flood risk zone, which is a key point to note.

Nonetheless, three sites significantly intersect a surface water flood risk zone. This is an issue, recognising the need to take a 'sequential' approach to avoiding flood risk, and given the possibility of greenfield development options that perform sequentially better in flood risk terms (because of avoiding flood risk zones, and also feasibly in terms of delivering flood water attenuation).

However, on the other hand, it is important to recognise that all three sites comprise primarily buildings and almost entirely impermeable hard surfacing for vehicle access, parking and storage, and their general age means that their means of handling surface water are limited. All are therefore contributing to localised flood risk, and there is clear opportunity to deliver flood risk betterment through sensitive redevelopment in line with the Chesham Design Code and accounting for wider policies including the proposed policy on urban greening. There is a particular opportunity at Townsend Road, which is adjacent to the Vale Brook culvert.

In **conclusion**, whilst the assessment in 2023 flagged some concerns, these are now reduced on account of the Environment Agency having been consulted and because there is now reduced pressure to deliver the sites, potentially leading to greater flexibility to account for flood risk at the planning application stage. There is also a strong focus on sustainable drainage and urban greening, such that there could be a betterment in terms of surface water drainage, although that is not to take away from the need to focus on avoiding residential uses in flood zones. Overall a **neutral effect** is predicted, as per the conclusion in 2023.

Climate change mitigation

The **context** is that climate change mitigation / decarbonisation is clearly a key issue nationally and locally (although Buckinghamshire has not declared a net zero target date any earlier than the national target date of 2050, whilst many local authorities have set a 2030 net zero target). There is a clear distinction between minimising per capita greenhouse gas emissions from: A) the built environment (which warrants being a focus here); and B) transport (noting a separate transport discussion below).

In respect of built environment emissions, attention can tend to focus on development management policies aimed at achieving standards over-and-above those required under the Building Regulations, but there is also a need to consider how best to realise opportunities through spatial strategy and site selection.

With regards to **spatial strategy**, it is difficult to draw any strong conclusions regarding the potential for the CHESH1 sites to deliver net zero development (ideally on-site, i.e. without having to resort to offsetting, in line with the energy hierarchy), or otherwise achieve high standards in terms of minimising CO₂ emissions. This is true whether the focus is solely on 'operational' emissions, or whether the definition of net zero is expanded to include the 'whole lifecycle' emissions associated with any building, including 'embodied' emissions in building materials.

It is understood the site viability work has indicated that policy compliant schemes will be viable on most of the sites and may be viable with some trade-offs with policy on a couple of the sites. There is nothing known now that suggests compliance with urban greening or sustainable urban drainage policy requirements will be undermined, nor that it will be a struggle to comply with likely forthcoming policies around 'net zero development' (N.B. the Draft CNP in 2023 proposed a policy requiring net zero development, but that policy has now been deleted). However, the simple fact is that brownfield sites in existing employment can sometimes face viability accept compromises in respect of delivering on policy objectives.

There is feasibly the possibility of exploring options to deliver a heat as part of a coordinated redevelopment of the cluster of sites to the north of the town centre. However, in practice, there is little or no reason to suggest this as a viable option.

Finally, with regards to the objective of minimising per capita CO₂ / greenhouse gas emissions from transport, to reiterate this is a focus of discussion below.

In **conclusion**, there is a high bar to reach ahead of predicting positive effects, given a need to support rapid built environment decarbonisation. In turn, there is a need to predict a **neutral effect**, given uncertainties regarding the potential to deliver net zero development at the CHESH1 sites.

Communities

The **context** is wide-ranging communities-related objectives of relevance, over-and-above objectives relating to accessibility to community infrastructure (see above).

With regards to **spatial strategy**, a key focus of CHESH1 is to deliver residential-led redevelopment of existing employment sites that represent bad neighbour uses, including due to HGV movements along unsuitable roads. There is considerable support locally for taking this approach, assuming that steps are taken alongside to support the intensification of employment areas that are better located in terms of neighbouring uses and access to the strategic road network (CHESH2).

One specific opportunity of note is at Bellingdon Road and Deansway, where access is not an issue in the same way as it is at those sites in the Yards (an older part of town), but there is a particular opportunity to a new mix of uses to the benefit of the adjacent mosque, also noting an adjacent small fire station.

Aside from bad neighbour issues, it is also the case that residential-led development of the CHESH1 sites could improve the quality of the urban realm / built environment within the town, and generally support regeneration and revitalisation. Confidence regarding benefits of CHESH1 in this regard is high on account of the extensive work that has been undertaken on the Chesham Design Code, which notably supports mixed use schemes and developments with terraced homes (a feature of Chesham). It is recognised that industrial areas within the town, including close to the town centre, are somewhat characteristic of Chesham, but some of the sites are 'showing their age' or are under-used, and none have particular historic character (unlike several other industrial areas not listed in CHESH1, including within Waterside).

The next matter for consideration is town centre car parking and, in this respect, the key point to note is that the previous proposal to significantly reconfigure town centre car parking, to include increased reliance on multi-storey car parking, is no longer being taken forward. Also, the previous proposal to redevelop the Elgiva site (should a new location for the theatre be found) is not being taken forward.

Finally, there is a need to consider the strong community objective of maximising housing growth in the urban area in order to minimise pressure for greenfield urban expansion. In this respect, the CHESH1 / CHESH2 strategy is clearly supported, as it amounts to a strategy of intensifying uses on existing/previously developed land. However, as discussed above, there can be no certainty regarding the extent to which it will have the effect of reducing the need / pressure to explore greenfield options through the Buckinghamshire Local Plan.

In **conclusion**, the spatial strategy is supported albeit direct implications are modest compared to 2023, and there is support from a ‘communities’ perspective for rethinking the strategy in respect of use of town centre car parks. The proposed development management policy framework is very strong, and so an overall **limited or uncertain positive effect** is predicted.”

Economy

The **context** is a need to ensure sufficient employment land, both to provide local employment opportunities, including for those with lower educational attainment, and to contribute to wider (Bucks-wide / sub-regional) economic growth objectives. There is a need to consider total quantum of employment land and also qualitative considerations around the type and quality of employment land.

With regards to **spatial strategy**, the broad strategy of supporting residential-led redevelopment of a small number of existing employment sites in the heart of the town combined with intensification of select existing employment sites on the periphery of the town (particularly those well linked to the A416) did not generate major objection through the consultation in 2023. Equally, the Environmental Report (2023) broadly supported the strategy, assuming it could be successfully delivered, as it would have the potential to diversify the employment land offer locally, avoid a significant net loss of employment land and support successful hubs for industrial and warehousing/logistics uses on the edge of the town.

In turn, this suggests support from CHESH1/CHESH2 as now drafted, recognising that the strategy is modified only in as much that there is no longer to support residential-led redevelopment of Howard Industrial Estate (discussed above).

Furthermore, with regards to the benefits of the current strategy, it is important to recall that there will be the potential to deliver mixed use development that includes some new employment space well-suited to higher value employment uses, including associated with the creative sectors. This could well align with Chesham-specific objectives given the local demographic, although there is also a need to consider the importance of supporting lower skilled employment.

However, there remains a degree of tension between the proposed strategy and economy / employment land objectives. This is in the context of a national, regional and sub-regional trend towards increased demand for industrial and (in particular) warehousing / logistics floorspace, including relating to online retail. Also, the broader point is a need to take a long-term perspective, recognising multi-year economic cycles, and uncertainties around future employment land needs.

There is a clear argument to suggest that employment land needs can be met without the CHESH1 sites, which are considered to be poorly located, as discussed. Also, it can be suggested that the existing employment land designations are outdated as national policy has moved on to discourage the wholesale safeguarding of employment land to instead focus on protecting land of strategic value. However, on the other hand, there is uncertainty because Bucks Council’s evidence base and strategy in respect of employment land is emerging at the current time.

In **conclusion**, the proposal remains to remove the existing employment land designations from a number of sites, hence the conclusion is unchanged from 2023:

“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

The **context** is a need to account for historic environment designations as well as non-designated assets (including historic industrial sites) and wider character.

With regards to **spatial strategy**, this is another matter that has been a focus of considerable scrutiny. None of the CHESH1 or CHESH2 sites are in the Chesham Conservation Area or its setting, and the other key point to make is that all of the CHESH1 sites include extensive existing built form that does not contribute significantly to local historic character, and in some cases potentially detracts.

Also, any concerns associated with redevelopment are reduced on account of the Chesham Design Code, which has a strong focus on ensuring new developments that complement and contribute to local historic character. A case in point is Alma Road Industrial Estate, which is adjacent to Chesham Cemetery. This is a non-designated heritage asset, but there should be a benefit to the setting of the heritage asset as a result of redevelopment.

However, the situation is less clear cut in respect of adjacent sites Higham Mead and Chesham Business Park, which are located within a historic part of the town (see [historic mapping](#)). There are three historic industrial buildings in this area that are set to be protected as non-designated heritage assets, and it could be suggested that ongoing industrial uses contributes to the setting of these assets. However, it is important to note that Higham Mead is shown as comprising a pond and watercress beds on the historic mapping, whilst Chesham Business Park is shown as mostly comprising a timber yard. On balance, it is considered that there is overall an opportunity associated with redevelopment that replaces poor quality buildings, derelict buildings / structures and derelict land. Also, one of the non-designated heritage assets is in poor repair (Lancome Factory) and another has been converted to flats (22 Higham Road).

Finally, with regards to the CHESH2 sites (‘Economic Growth Locations’), there is a sensitivity at Latimer Road (Weirhouse Mill) given the presence of two Grade II listed buildings on the site. This is clearly a constraint to intensification. However, any proposal to reuse and/or intensify the established employment uses on the site must comply with heritage law and policy in respect of preserving and enhancing their special architectural and historic character.

In **conclusion**, whilst most aspects of the spatial strategy give rise to limited concerns, one of the CHESH2 sites identified as suitable for “economic growth” is notably constrained. A neutral effect was predicted in 2023, and work has been ongoing since to ensure that impacts are avoided and mitigated (including following consultation with Historic England), but there remains a degree of tension between the spatial strategy and historic environment objectives, and so an overall **neutral effect** is still predicted at the current time.

Homes

The **context** here is a need to provide for locally arising housing needs, both in total quantitative terms and in qualitative terms (type, size and tenure). Specialist housing needs, including older persons housing, are another important consideration.

With regards to the **spatial strategy**, some concerns were raised in the Environmental Report (2023) regarding the CNP's objective of concentrating housing growth at brownfield sites in the urban area as an alternative to greenfield urban expansion. This reflected the issue of delivery uncertainty, as discussed above, but also the fact that greenfield sites are much better suited to delivering family homes with gardens and also affordable housing in line with policy expectations (e.g. 40% affordable housing overall, to include a good proportion of social housing). Strategic urban extensions can also be suited to delivering specialist housing.

However, as discussed, it is now less the case that the CHESH1 sites are proposed as an "alternative" to urban expansion. In this light, there is clear support for the CHESH1 sites, which have capacity to deliver ~400 well-located new homes. In light of the CNP, including the CHESH1 sites, the Buckinghamshire Local Plan will be well-placed to develop and implement a strategy for providing for Chesham's housing needs (alongside delivering on wider objectives, e.g. infrastructure-related).

In **conclusion**, whilst the equivalent assessment in 2023 raised some concerns and ultimately concluded a neutral effect, it is now considered to appropriate to predict a **limited or uncertain positive** effect on the baseline. The updated policies promote the reuse of brownfield land to deliver new homes as a proactive way of derisking them for their land interests and prospective developers, but the delivery uncertainties that remain are appropriately recognised and acknowledged.

Land

The **context** here is a need to minimise 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' (grade 1, grade 2 or grade 3a quality), and no land surrounding the town has been surveyed in detail to establish agricultural land quality.

With regards to **spatial strategy**, whilst there is clear support for maximising the supply of homes from the urban area, there is no certainty regarding the extent to which the CNP will minimise pressure for urban expansion.

In **conclusion**, therefore, a **neutral effect** is predicted.

Landscape

The **context** here is that all greenfield land surrounding the town falls within the London Metropolitan Green Belt, and the majority (all bar land to the east) falls within the Chilterns National Landscape.

On a more local level, it is also fair to highlight clear landscape sensitivities associated with topography/geology and historic land uses. 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.

Finally, by way of context, greenfield sites around the town that are being promoted for development through the Buckinghamshire Local Plan can be seen [here](#).

With regards to **spatial strategy**, the situation is *as per* the discussion above, under the 'land' heading. Also, it is important to note that Policy CHESH8 seeks to protect and enhance the network of green infrastructure assets inside the town and into the surrounding countryside landscape of woods, trees, hedgerows and waterbodies.

In **conclusion**, on balance it is considered appropriate to conclude a **limited or uncertain positive effect**, as per the conclusion in 2023, albeit the ambition of the 'brownfield first' strategy has been significantly reduced.

Transport

The **context** is key objectives around minimising the need to travel and supporting modal shift away from the private car. This reflects a need to: A) minimise CO₂ emissions to mitigate climate change; B) minimise air pollution given that this is an issue locally; and C) minimise traffic congestion, not least because traffic congestion is a barrier to effective bus services. Delivering on transport objectives means directing growth to accessible and well-connected locations, but it also means directing growth so as to support delivery of targeted new/upgraded transport infrastructure in line with strategy (e.g. any future [LCWIP](#), or emerging [LTP5](#)).

With regards to **spatial strategy**, benefits of CHESH1 / CHESH2 relate to:

- Concentrating industrial and warehousing uses on the periphery of the town at sites with good access to the strategic road network.
- Concentrating housing growth at locations within easy walking distance of the town centre and public transport, most notably the train station. Directing housing towards the town centre could also help to support bus services.
- Supporting the vitality of the town centre.
- Delivering and/or supporting local shops etc outside of the town centre.

Housing growth in the urban area is not without its issues, in terms of traffic management, but it is noted that Policy CHESH13 aims to restrict car parking, which will assist with encouraging trips by walking, cycling and public transport. In addition, Policy CHESH4 encourages the provision of new local shops and services, recognising that Chesham's topography and layout makes walking and cycling between the suburbs and the town centre more challenging.

In **conclusion**, whilst the ambition of the spatial strategy is now reduced relative to 2023, the issue of town centre car parking has been resolved, and there is strong support for the proposed sites / strategy and the development management policy framework. As such, a **limited or uncertain positive effect** is predicted.

Water

The **context** is that both water supply and water quality are significant issues locally. With regards to water supply, this is a larger-than-local matter for Affinity Water's Water Resource Management Plan (2019). With regards to water quality, there is a need to consider the risk of capacity breaches at Chesham Sewage Treatment Works (located on the River Chess close to Latimer), but there is uncertainty ahead of a Buckinghamshire Water Cycle Study. Another issue can be the local sewer network, and there are some challenges locally, but these can typically be resolved.

With regards to **spatial strategy**, it is difficult to draw conclusions on the merits of CHESH1 / CHESH2. One consideration is that 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). Another consideration is that high standards of water efficiency is another design consideration that does have cost / viability implications.

In **conclusion**, a neutral effect is predicted.

Overall conclusions

Whilst the assessment in 2023 raised a number of concerns with the brownfield first strategy at the time, including because of delivery risks, the new proposed strategy performs better, including because the intention is only to signal support for residential-led development of the CHESH1 sites, as opposed to presenting them as formal allocations. This means there will be flexibility to plan to meet housing needs and wider objectives for Chesham through the Buckinghamshire Local Plan.

The main potential tension with sustainability objectives is around the proposal to promote the redevelopment and change of use of some existing employment land. However, the strategy has a clear rationale, including accounting for the economic / employment value of the sites, and given the potential for businesses to relocate to identified economic growth locations (CHESH2). Also, it could well be that the sites remain in employment use the shorter term.

There are also some modest tensions with flood risk and historic environment objectives (the Environment Agency and Historic England may comment further).

Other proposed policies in the plan are all broadly supported, and their effect in combination with the proposed spatial strategy (CHESH1 and CHESH2) is such that it is possible for the assessment to conclude limited or uncertain positive effects under several of the SEA framework topic headings.

Next steps

Representations received on the CNP, this Environmental Report Update and the wider evidence base will be summarised and provided to an Independent Examiner, who will then oversee an independent examination. Once the examination process is complete, the CNP will be able to progress to a Regulation 16 referendum.



Chesham town centre, with the Yards and Newtown to the north, along with Chartridge to the north west. The Old Town is out of shot to the west.