

CHAPTER 14: ENVIRONMENTAL APPRAISAL

INTRODUCTION

- 14.1 Local planning authorities are required to have careful regard to environmental considerations when formulating their development plans. Planning Policy Guidance Note 12, "Development Plans and Regional Planning Guidance", suggests that account should be taken of environmental issues in their widest sense. It is the Government's intention to work towards ensuring that all development and growth are more sustainable in their impact upon the environment and their use of non-renewable resources. Development plans have a key role to play in achieving such goals, especially by ensuring that future generations are not denied the best of today's environment. The Government considers environmental appraisal of plans is essential to achieve these objectives by evaluating both the total and individual impact of proposals upon the environment.
- 14.2 Environmental appraisal enables the consequences of planning decisions to be taken into account systematically in the preparation of the policies and proposals of a plan. The Department of the Environment has published its guidance in "Environmental Appraisal of Development Plans: A Good Practice Guide, 1993". Ideally, environmental appraisal should be undertaken in conjunction with production of a Consultation Draft Local Plan. This would enable those considering the plan to see exactly how the environmental objectives have been met and to allow comments to be made on the environmental impact of individual policies and proposals.
- 14.3 The guidance on environmental appraisal was, however, only published during the latter stages in the production of the Consultation Draft of the new Borough Local Plan. It was not therefore, practical at that stage, to carry out a full appraisal of the plan using the guide. Instead, Chapter 13 of the Consultation Draft contained a general review of the overall environmental effects of the plan. Subsequently, it has been possible to undertake an appraisal of the Consultation Draft, based upon the good practice guide's advice. This is to be published as a separate document to accompany the Deposit Draft plan. The findings of the appraisal have been summarised in the following section. Where appropriate, the findings have been used to modify policies for the Deposit Draft to increase environmental gains and to reduce environmental disbenefits. In due course, a supplement to the published Environmental Appraisal will be produced reviewing again the environmental impact and status of the Deposit Draft's policies and proposals.

THE ENVIRONMENTAL BASIS FOR THE LOCAL PLAN

- 14.4 This Local Plan has been prepared in the light of the Government's policy to achieve more sustainable development. The strategy and policies of the Plan are founded in a number of documents which have environmental protection and the conservation of resources as their main principles.
- (i) The strategy of the recently published Regional Planning Guidance for the South-East is to direct the pressures for development to the east of London and away from areas like Gatwick and Crawley. This is to permit the environment and infrastructure of the latter areas to recover from the effects of past pressures for excessive development growth. Regional Guidance places the capacity of, and the conservation of the environment to the fore in its decisions on the extent to which new development should be accommodated in this area.
 - (ii) Protecting and improving the environment and the County's resources is the paramount strategic objective of the West Sussex Structure Plan, 1993. New

development is to be provided for only where it does not conflict with this objective.

- (iii) Recent Planning Policy Guidance indicates new Government thought about the role planning should play in protecting our environment and resources. It identifies new approaches to planning and indicates how the need for greater sustainability can be taken into account.
- PPG7 “Countryside and Rural Economy” encourages rural enterprise whilst controlling development to protect important landscapes, wildlife habitats, historic features and the best and most versatile agricultural land;
 - PPG9 “Nature Conservation” recognises the value of including nature conservation policies in local plans, for both legally designated conservation sites and those of local value;
 - PPG13 “Transport” recognises the need to reduce the need to travel, particularly by car, and to promote other more sustainable modes of transport;
 - PPG15 “Planning and the Historic Environment” recognises the need to reconcile the need for economic growth with the need to protect the natural and historic environment;
 - PPG22 “Renewable Energy” requires local authorities in preparing development plans to consider the contribution that can be made to meeting the need for renewable energy;
 - PPG23 “Planning and pollution control” states that planning has an important role in determining the location of development that may give rise to pollution and in minimising the effects of pollution upon the environment and sensitive development.
- (iv) The "UK Strategy for Sustainable Development" originated from the 1992 Earth Summit, and outlines the role local authorities can play in providing for more sustainable development.

THE ENVIRONMENTAL STRATEGY OF THE PLAN

- 14.5 The quantity of new development to be provided in the borough by 2006 has been determined by Regional Planning Guidance and the Structure Plan. It has to be assumed that the overall environmental impact of accommodating the specified scale of development is acceptable and within the capacity of the area. It is in determining how and where this development is to be accommodated within the borough, that the Local Plan can have most influence on its environmental consequences.
- 14.6 One of the most important ways planning can influence development's environmental impact and use of resources is by minimising the need to travel, especially by the car, and by maximising the potential for the use of more energy efficient and environmentally acceptable modes of transport. Transport is one of the greatest consumers of world resources especially non-renewable hydrocarbon based fuels. Cars, roads and car parks have a wide ranging impact upon the environment. They cause atmospheric, visual and noise pollution, absorb oxygen and produce carbon monoxide, carbon dioxide and nitrous oxide and consume vast areas of land, often in locations where useable land is scarce.
- 14.7 In approving the 1993 Structure Plan, the Secretary of State for Environment redistributed the provision of an additional 1,500 dwellings from Mid Sussex (as had been proposed at the Examination in Public), to Crawley. He suggested that this housing would be more sustainable in Crawley where most of the residents would be working. He also suggested that it could be more environmentally acceptable to provide this housing in the form of a new neighbourhood.

14.8 The Local Plan's strategy builds upon the Secretary of State's logic. The strategy for the location of development is one of concentrating homes, jobs and facilities in a few specific locations so as to minimise the need to travel, particularly by car, and to maximise the potential to use more energy efficient modes of transport. This approach also makes the best use of land resources and existing or new infrastructure, and provides for better environmental protection and improvement measures.

14.9 The main locational elements of the Local Plan's strategy are:-

- most new housing is to be located where it is convenient to the main employment centres and existing facilities and where there is the opportunity to use existing or new modes of public transport.

- most new employment development and new facilities and services which cater for an area wider than a local neighbourhood are to be concentrated in existing centres and locations already well served by public transport.

- throughout the borough, most existing open space and countryside is to be protected from development. The environment of other areas for which there are no specific proposals is also to be safeguarded.

ENVIRONMENTAL APPRAISAL OF THE CONSULTATION DRAFT

14.10 The D.O.E.'s "Good Practice Guide" suggests key environmental stock criteria against which planning policy and proposals might be judged. These have been modified to incorporate the main environmental issues in Crawley. For instance the environmental stock criteria "urban environment liveability" has been modified to reflect local initiatives, such as traffic calming. Similarly, the value of new town facilities and layouts and the importance of the local architectural style, has been recognised as important for the borough's cultural heritage. The environmental stock criteria used in the environmental appraisal of the Local Plan are shown in figure 1.

Method of Appraisal

14.11 In appraising policies, the Borough Council has adopted a slightly more rigorous method than identified in the Good Practice Guide. The impact symbols used were based upon those suggested in the Good Practice Guide. However, where there was a likely, rather than a certain impact, a further symbol has been added to show whether this likely impact would be beneficial or adverse.

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| <ul style="list-style-type: none">• - No relationship or insignificant impact☺ - Significant beneficial impact☺? - Likely beneficial impact☹ - Significant adverse impact☹? - Likely adverse impact? - Uncertainty of prediction or knowledge |
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14.12 In appraising the Plan, the Borough Council, has made the assumption, that in virtually all cases, new development will use some non-renewable resources, for instance land, and will have an effect upon the environment and is therefore less sustainable than no development at all. However, given that the Local Plan is obliged to ensure an adequate supply of land for employment and residential development, it is inevitable that its policies and proposals will have a considerable impact upon both the local and

wider environment. To allow for this, whenever a policy could have the effect of reducing the use of resources or the adverse environmental impact of developments, it has been regarded as having positive impact. Taking this realistic approach to development means that in some respects, the appraisal may appear to down-grade the environmental impact of some of the Plan's policies and proposals. However, the appraisal cannot make a comparison between locating vitally needed development in Crawley and in other locations. If it had been able, it seems likely that it would have shown that the locations chosen by the Plan for this development are, in environmental terms, much better than the alternatives.

SUMMARY OF THE FINDINGS OF THE APPRAISAL

General Development

- 14.13 This chapter deals with the control of development to safeguard amenity and to protect and improve the environment. As it does not allocate any sites for development, the impact of the chapters policies upon all aspects of the environment and the use of resources is likely to be beneficial, both locally and further afield.

Built and Natural Heritage

- 14.14 This policies of this chapter will normally have a significant, beneficial impact upon maintaining and improving the local environment. This is particularly the case with cultural heritage policies aimed at protecting and enhancing conservation areas, listed buildings and archaeological sites. Policies in this chapter could also have a positive effect by enhancing global sustainability and reducing pollution through promoting nature conservation and the protection of historic gardens.

Use of the Countryside

- 14.15 The countryside policies could also have a positive impact upon the environment in a variety of respects. The objective of its policies is to ensure that not only is the countryside protected for its own sake, but it is used in a more sustainable manner and the public benefit from greater access to many areas. Policies also aim to improve the local environmental quality of many areas and to improve public use of open space. The chapter will also benefit air quality and global sustainability, by aiming to reduce the need for car movements and to develop open land.

Transport

- 14.16 One of the key aims of this chapter is to encourage more sustainable forms of transport which generate less pollution in all its forms and which use non-renewable resources much more efficiently. Much of this is achieved through policies which aim to manage the use of the car and to give proper consideration to the full social and environmental consequences of development proposals and their travel and transport implications. Specific initiatives include support for traffic calming measures, providing cycle facilities, ensuring that new developments are accessible by public transport and, in certain instances, requiring developers to provide improvements to roads, cycling and pedestrian facilities. These will have a wide variety of environmental benefits by reducing energy consumption and air pollution, by minimising the land lost to roads and car-parks and by generally ensuring that local environments are less dominated by the car.
- 14.17 There could, however, be some environmental disbenefits associated with a few policies and proposals. To an extent, this is inevitable, in that virtually all forms of transport will involve the consumption of some resources. This is particularly the case given that the development of Crawley is set to continue, its population will grow and

its importance as an employment and shopping centre is to be enhanced. All these factors will inevitably give rise to greater demands for travel and movement which, even handled in the most sustainable manner, will still consume resources and have a significant impact upon the environment. The appraisal therefore identifies the detrimental environmental impact of certain proposals, such as the High Street Relief Road and the provision of short term car parking spaces even though these proposals have themselves the objective of producing environmental benefits in other areas. Overall, the appraisal recognises that if the proposed strategy for transportation and movement is not adopted, the impact upon the local and wider environment of catering for future travel demands could be far worse.

Housing

- 14.18 The appraisal recognises that the development of land necessary to meet the Structure Plan housing requirement will have some environmental disbenefits. However, the appraisal also identifies that the Plan's adherence to new town planning principles will ensure that wherever possible, the potential adverse impact is kept to a minimum. By locating much of the new housing within existing neighbourhoods, and by the allocation of a single new neighbourhood, less greenfield sites will need to be developed. This will reduce the need to travel, particularly by car. This is particularly the case with the provision of neighbourhood facilities such as shops, community centres and recreational facilities which can either be walked to or are on public transport routes. The provision of recreational space and the creation of open areas within the new neighbourhood will benefit air quality, global sustainability through CO₂ fixing and generally the quality of the local environment.

Economy

- 14.19 To meet Structure Plan requirements, provision has to be made for the development of a further 45,000 sq. m of employment floorspace. There is a strong economic and employment justification for this development. However, it could have a number of significant environmental disbenefits. Consequently, in drafting the Plan, important considerations were to limit the physical extent of development and to choose locations where there could be environmental gains or, at least, more limited environmental impact. Concentrating development within the existing built up area, such as in existing neighbourhoods and within the town centre, will ensure that there will be less need for car movements. Furthermore, more people working in the town centre could make it livelier and more pleasant. Finally the appraisal recognises that by providing more and wider employment opportunities for local residents, they will not need to travel further afield for employment.

Shopping

- 14.20 Some of the policies of this chapter could result in a few environmental disbenefits, notably those which promote Crawley as a sub-regional shopping centre, which will lead to development and increasing transport movements. Concentration upon existing centres including the town centre could, however, be more sustainable than the alternatives of the development of new out-of-town sites for they are likely to be more accessible by public transport, on foot and by cycle. By increasing the number of people within the town centre, these policies will improve the local environment giving it a livelier atmosphere. This is advantageous as the Plan also has several policies aimed at promoting a wide range of environmental improvements in the town centre.

Gatwick Airport

- 14.21 It is the Government's policy for Gatwick Airport to achieve its full potential as an international airport with a single runway and two terminals. The Local Plan has to accord with this policy. However, as Gatwick Airport has the potential to increase passenger levels up to 40 million passengers per annum, there will almost inevitably be an increase in the number of plane movements and a need for a variety of additional developments at the airport. This could have considerable environmental disbenefits when judged against most of the environmental stock criteria. However, a number of policies try to reduce or avoid this adverse impact, to limit or control pollution and the physical extent of new development and to retain open space and landscaping areas. Other policies promote more sustainable forms of surface transport, or requiring a number of specific environmental improvements. Overall, the policies of this chapter should help secure a better balance between the advantages of a growth in airport business and its impact upon the environment.

Recreation and Leisure

- 14.22 The only policies which could have a detrimental environmental impact are those relating to the allocation of sites for new development. However, developing facilities close to where they are needed will ensure that as many as possible of the new trips generated by the development will be taken by means other than the car. This is particularly the case with the major development proposals in the Plan, such as the allocation of the Town Mead site for commercial leisure purposes. While it will increase traffic generation in this location, its environmental impact could be far worse if sited out of town where access by public transport or by cycle and by foot could be difficult.

Community Services

- 14.23 Again the principle of siting new development as close to the source of its demand as possible could help to reduce the potential adverse environmental impact of several of the policy allocations in this chapter. One proposal could, however, be less satisfactory in terms of its overall environmental implications. The possible provision of a new hospital in an out-of-town location, as allowed for by the Consultation Draft, could actually increase the need to travel and to use the private car unless it can be well connected by public transport services. This concern was noted when the policy was drawn-up, however it was considered that the importance of good health services to the local community justified an exception to the Plan's usual approach to siting major development.

CONCLUSION

- 14.24 Development plans have an important role in meeting social and economic needs as well as addressing environmental objectives. Inevitably, compromises have to be made between competing and conflicting objectives. It must always be recognised that all new development has an effect on our environment and use of resources. The appraisal recognises that the Plan has attempted to resolve these competing demands, especially by normally choosing to locate socially and economically necessary developments where travel demands can be minimised.
- 14.25 The appraisal of the Consultation Draft Local Plan, has concluded that measured against the environmental stock criteria, the proposed policies and allocations, when taken as a whole, will make an important contribution to the general protection and improvement of the environment and the way that it is used. This is notwithstanding the fact that the Plan makes provision for a significant amount of new development.

In general, the appraisal demonstrates that the adverse impact of accommodating new development could be reduced by the Strategy adopted by the Plan to the location of development and to transport and movement issues. In addition, the appraisal shows that many of the Plan's other policies and proposals could have a positive impact upon the environment, both locally and further afield.

- 14.26 Overall, it is considered that the Plan represented a significant step in the direction proposed by the Government's guidance for the environment, and should generally satisfy the objectives which have been set for the Plan.