Purpose of the project:
An EIA was undertaken in support of an Outline Planning Application for Zones 2 and 3 of a large scale sustainable urban extension to Corby, comprising some 3,500 homes alongside formal and informal open space, two primary schools, two local centres and two expansions to Local Wildlife Sites. Developer and client: Urban & Civic Corby Limited.

Description of the project:
A cross-authority-boundary application, with Zones 2 and 3 falling within the administrative areas of Corby Borough and East Northamptonshire respectively. Outline Planning Permission was previously granted by Corby Borough Council in 2007 (and amended via a Section 73 in 2013) for Zones 1 and 2; and by East Northamptonshire Council in 2012 for Zone 3. Zone 1, within Corby, has largely been built out, comprising of 1850 dwellings, a secondary school, a data centre, employment land parcels and a district centre.
The purpose of the new Outline Planning Application was to refresh the vision for Zones 2 and 3 including an increase in dwelling numbers.

**Key Issues:**

**Cross-boundary Co-ordination:** Several environmental matters in need of assessment (namely the presence of archaeological remains, land instability, contamination, and Local Wildlife Sites) were specific to just one zone or the other, thus only of concern to one Local Planning Authority (‘LPA’), whilst other matters (including air quality, drainage, transport and socio-economics) transcended the whole site. The Environmental Statement therefore needed to address the bespoke requirements of each LPA as well as site-wide issues.

**Establishing Baselines:** Given the implemented and live original Outline Planning Permission, which was itself an EIA application supported by a wealth of approved documentation, the EIA Regulations and available guidance were found to be somewhat inconclusive as to what the current and future baselines should be. Did the extant permission constitute the current baseline, the future baseline, or not be factored into the assessment at all?

**Project Team Co-ordination and Quality Management:** As a relative newcomer to EIA, this was a steep lesson in performing the co-ordination and compilation role that is typically the responsibility of the Planning consultancy involved.

**Lessons Learnt:**

**On Cross-boundary Coordination:**
Early engagement with both LPAs and key consultees was undertaken through formal pre-application enquiries and requests for screening and scoping opinions, as well as informally at monthly meetings with the Councils. During this process it was agreed that duplicate planning applications, and therefore duplicate Environmental Statements, would be submitted to each Council, which enabled a single, holistic EIA process for the whole site. The scoping process was a particularly valuable opportunity to set out, and to obtain the agreement of both Councils to, a comprehensive scope of Zone-specific and site-wide matters in need of assessment, including a combined list of developments for cumulative assessment purposes.

**On Establishing Baselines:**
Schedule 4, Paragraph 3 of the EIA Regulations 2017 requires Environmental Statements to include a description of the current state of the environment (the current baseline) and the likely evolution of that state without implementation of the proposed development “as far as natural changes can be assessed” (the future baseline). The Regulations were therefore clear that the current baseline should be the present situation, regardless of any planning application or permission. However, the future baseline, in this case, assumed that development would occur in any case under the extant Outline Planning Permission should the new applications fail to obtain approval. Although not a “natural change,” it was considered most important to assess the likely environmental effects of the fresh proposals against what was already consented, with the aim of demonstrating significant betterment.
On Project Team Co-ordination and Quality Management:
The co-ordination, compilation, checking and fine-tuning of an Environmental Statement is a potentially mammoth task for the Planning consultant, though one that can be significantly reduced by deploying a robust template for all co-consultants to follow in drafting their chapters. The template should enable assessment methodologies to be set out through a series of sub-headings with explanations as to what is required under each. It is also crucial that the template establishes consistent and coherent terminology to describe the significance and adversity of effects. From a housekeeping perspective it is greatly beneficial, in terms of time and resultant fees, for the template to establish a clear font, size, margins, line spacing, header, footer, chapter and paragraph numbers, and numeration of appendices and figures. If possible, Chapters 1 to 3 (Introduction, The Site and the Proposed Development, and Planning Policy) should be circulated to chapter authors along with the template as this helps to ensure that all co-consultants are working to the same baselines, development description and parameters, and developments for cumulative assessment.

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