

SD012

Chelmsford Local Plan

Schedule of Representations - Pre-Submission IIA and
Focused Consultation Additional Sites Addendum IIA –
By representor order

May 2026



Schedule of Representations - Pre-Submission IIA and Focused Consultation Additional Sites Addendum IIA y representor order

This document lists all representations made to both the Pre-Submission IIA and Focused Consultation Additional Sites Addendum IIA consultations in order of the representor's name.

The following is included for each representation:

- The unique comment identification number (Comment ID) given to the representation, with the following prefixes:
 - PSIIA- for the Pre-Submission IIA
 - ASIIA- for the Focused Consultation Additional Sites Addendum IIA
- The representor's unique ID number in the Local Plan Consultation Database, followed by their name in the heading and the table, with a new heading for each representor
- The consultation point in the document the representation was made to
- The full text of the representation made to the relevant questions
- A link to any relevant attachment/s included with the representation.

The following should be noted when using this document:

- Where a company or organisation has made the representation this appears instead of an individual name
- The tables only include questions which were responded to by the representor.

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Chelmsford Local Plan

1 Representations to the Pre-Submission
(Regulation 19) Integrated Impact Assessment
By representor order

May 2026

ID	PSIIA-23
Person ID	1360233
Full Name	Ms Becky Armstrong Mrs R Armstrong and Mr B Howard
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Para 6.4.11
Question 2 - Please type your comment below:	<p>Utilising a settlement hierarchy to guide the distribution of development within the administrative area is deemed a logical and conventional approach, which has been successfully employed in the preparation of numerous sound Local Plans in recent years. This method can be a valuable tool for ensuring sustainable distribution of development, although it is crucial that its application to policies and allocation should not be overly simplistic and should account for broader sustainability considerations.</p> <p>We support the designation of Roxwell as a Service Settlement. Service Settlements have more limited services and facilities but typically include primary schools, convenience shopping facilities and community facilities making them suitable for a more limited scale of development.</p> <p>Although we agree with the use of a settlement hierarchy to inform decisions regarding the scale of growth directed to various settlements within the borough, the current wording of the policy text makes it unclear how the settlement hierarchy outlined in Strategic Policy S7 is to be utilized by decision-makers.</p> <p>If the settlement hierarchy merely provides an explanation for the proposed distribution of growth in the subsequent section of Strategic Policy S7, it might be necessary to remove it from the policy and place it within the reasoned justification. In this context, we wish to highlight a similar issue recently addressed through the examination of the West Suffolk Local Plan. In this case, the settlement hierarchy and dwelling distribution by settlement were included in the submitted policy text. However, one of the Inspectors' actions for West Suffolk Council arising from the examination hearing sessions was to remove this table from the policy text and place it in the reasoned justification.</p> <p>While the above represents a potential way to handle the settlement hierarchy if it serves no function other than justifying subsequent policies or allocations, it does not address concerns that the Local Plan may fail to deliver sufficient homes to meet community needs.</p> <p>In this respect, we propose an alternative solution that better aligns with national policy and would enable the Local Plan to be considered positively prepared: maintaining the settlement hierarchy within Strategic Policy S7, accompanied by explanatory text instructing decision-makers to direct additional growth beyond that designated on sites allocated by the Local Plan. For example, it could clarify that potential residential development sites beyond settlement boundaries would still be considered positively, considering the settlement hierarchy and other Local Plan and national policies. Such an approach would help mitigate the fact that the submitted Local Plan seeks to provide fewer homes than the current Standard Method should require to address the housing crisis, addressing the concerns identified regarding Strategic Policy S7.</p> <p>One does not have to look far for a potential example of how such a policy could be set out. In neighbouring authorities' North Essex Authorities' Shared Strategic Section 1 Plan, Policy SP 3 includes the following: "Existing settlements will be the principal focus for additional growth across the North Essex Authorities area within the Local Plan period. Development will be accommodated within or adjoining settlements according to their scale, sustainability and existing role both within each individual district and, where relevant, across the wider strategic area. "Future growth will be planned to ensure existing settlements maintain their distinctive character and role, to avoid coalescence between them and to conserve their setting. Re-use of previously developed land within settlements is an important objective, although this will be assessed within the broader context of sustainable development principles, particularly to ensure that development locations are accessible by a choice of means of travel."</p> <p>The above was found sound in relation to the NPPF 2012.</p> <p>One way to reword the current Policy S7 having regard to all of the above, would be as follows: Development will be brought forward in accordance with the Spatial Strategy Development Locations and Allocation, as well as through development within and adjoining existing settlements having regard to the settlement hierarchy below, as well as other policies within this Plan and the NPPF, read as a whole.</p> <p>The above modifications would need to be made in conjunction with changes to other policies and text within the emerging Local Plan, including that which classifies any land beyond the Defined Settlement Boundaries as Rural Area, and adopts a negative stance to residential development of such.</p> <p>The alternative to the above would be to simply move the settlement hierarchy table to the reasoned justification text, but seek to increase the number of new homes the Local Plan will deliver through alternative means, e.g. by increasing the number of sites allocated for development.</p> <p>Spatial Strategy Options and the Green Belt</p> <p>The Integrated Impact Assessment (IIA) acknowledges that to meet residential and employment needs under transitional and higher growth levels, additional site options beyond the existing Local Plan allocations will be required (paragraph 6.4.29).</p>

The IIA confirms that site options within the Metropolitan Green Belt and Green Wedge would not be considered as part of the spatial options to meet residual needs. This, it explains, is primarily because there are sufficient and suitable site options available outside of these areas in order to meet the proposed development requirements. However, meeting development needs is not simply about fulfilling housing numbers to accommodate future growth in purely numerical terms — it is incumbent upon the plan-making process to ensure the Local Plan will do so in a sustainable manner. Case law (e.g. Calverton) confirms that a key factor in determining whether there are exceptional circumstances which justify alterations to the Green Belt is whether it is possible to meet development needs sustainably without doing so.

Green Belt is of course a national designation to which the NPPF attaches great importance.

It is not justified for the plan-making process to simply reject any options entailing development of land within them than it is for the process to automatically reject any development in the Green Belt, without considering the implications of such an approach on achieving sustainable development.

The Council have confirmed that they do not consider there to be exceptional circumstances to release Green Belt land leading to the approach being rejected. However, the IIA suggests that residual housing needs can be met without using sites within the Green Belt. However, it also notes that Chelmsford City Council has received requests from Castle Point Borough Council, Southend-on-Sea City Council, and Basildon Borough Council to help meet their unmet housing needs through Chelmsford's Local Plan allocations (paragraph 6.4.11). The IIA further states that Chelmsford's proposed Spatial Strategy has no capacity to accommodate unmet housing needs from neighbouring authorities (paragraph 6.4.14).

One could therefore argue that the need to address neighbouring unmet housing need constitutes exceptional circumstances to justify a spatial strategy capable of doing so.

Therefore, it would be logical and appropriate to test spatial options involving the release of land from the Green Belt to help address this shortfall. As acknowledged in paragraph 6.4.15, even providing the full standard method assessment of 1,454 homes per annum would create capacity for some neighbouring unmet need — a scenario based on a spatial option that does not release land for housing from the Green Belt.

The IIA has therefore failed to test all reasonable alternatives. Discounting all sites within the Green Belt without properly assessing them as reasonable alternatives makes the proposed Spatial Strategy unjustified and unsound.

However, the Spatial Strategy can be made sound by allocating sites within the Green Belt, such as Green Lane, Roxwell, to support higher housing delivery and, in part, help meet the unmet housing needs of neighbouring authorities.

Furthermore, and for the avoidance of doubt, it should be noted that the concerns we have raised in respect of the IIA should not be viewed as fatal to the plan-making process — as confirmed through the Cogent judgment, defects in the SEA process can be addressed, even at an advanced stage in the plan-making process.

1332509, Brentwood Borough Council

ID	PSIIA-43
Person ID	1332509
Full Name	
Company / Organisation	Brentwood Borough Council
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	General comment
Question 2 - Please type your comment below:	Brentwood Borough Council (BBC) acknowledges the publication of the accompanying Pre-Submission Integrated Impact Assessment (IIA, 2025). BBC has no specific comments to make regarding the legal compliance of these documents or their conclusions.

ID	PSIIA-45
Person ID	1357742
Full Name	Mrs Joanne Britter
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Appendix G and M
Question 2 - Please type your comment below:	<p>I believe that the site is not legally compliant and it is unsound because it goes against the Integrated Impact Assessment produced for the Local Plan Review.</p> <ul style="list-style-type: none"> • Please refer to page 495, Appendix G - Appraisal of Proposed Site Allocation and Reasonable Alternatives. The findings list that the site complies less well with the Spatial Principles and Spatial Strategy. • Please refer to page 851, Appendix M - Assessment of SHELAA Sites: Mythology and Outputs. The site NLUD REFERENCE CFS158, OBJECTID 379 has been listed as 'green' for distance to a secondary school. The nearest school is approximately 7.5km away and although there is a school bus within 1km of the proposed site, it is not free to all the village and seats are limited. Therefore, I feel that the measurement of 'green' is unsound and does not convey the entire situation. • Please refer to pages 860 and 872, Appendix M - Assessment of SHELAA Sites: Mythology and Outputs. The same site mentioned above (379) is listed 'green' for Presence of Flood Zone and Presence of Flood Risk Area, yet a site which is just one road away OBJECTID 150, NLUD REFERENCE 15SLAA43 is listed as 'amber' for the presence of Flood Zone. Even if the data has come from a government website I do feel that a full assessment of site CFS158 is required. <p>I therefore respectfully request that this site be removed from the Local Plan since there are many discrepancies in both the Integrated Impact Assessment paperwork and the SHELAA document which are outlined in one of my other objection emails.</p>
ID	PSIIA-46
Person ID	1357742
Full Name	Mrs Joanne Britter
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Table NTS1
Question 2 - Please type your comment below:	<p>The inclusion of the above site is unsound because the Integrated Impact Assessment document produced by WSP has some very confusing criteria and key but if my understanding of the document is correct then I believe some of the statistics are wrong.</p> <p>Assessment Objective 1 - Biodiversity already shows that the site is uncertain for fostering growth and investment and providing new jobs. I do not see how 20 houses will foster investment and provide new growth other than in the short term when it provides some work for the building contractors.</p> <p>Assessment Objective 3 - Economy has a neutral score of 0. According to the matrix and the key it means it is neutral for promoting smart active travel and sustainable transport. I consider that the site is actually incompatible for this objective.</p> <p>Assessment Objective 6 has a transport scoring of ? Which means uncertain. I believe again that this scoring should be incompatible as the site does not reduce the need for travel or promote more sustainable modes of transport.</p> <p>Assessment Objectives 8,9 and 10 have all scored a 0 which again means neutral. The flood risk is certainly not neutral. There is already flooding in the fields ,neighbouring gardens which is leading to subsidence of some properties. This is certainly not neutral.</p> <p>Assessment Objectives 11 and 14 already highlight that the proposed building on this piece of land is incompatible with cultural heritage and landscaping. I agree with these points.</p> <p>With the above assessment of objectives 13 and 14, along with what I consider errors with the other assessment objectives I politely ask that the above site be removed from the local plan.</p>

ID	PSIIA-27
Person ID	1380259
Company / Organisation	The Bucknell Family
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Para 6.4.11
Question 2 - Please type your comment below:	The IIA acknowledges that the Council received approaches from Castle Point Borough Council, Southend on Sea City Council and Basildon Borough Council requesting that Chelmsford help meet unmet housing need through its Local Plan allocations (paragraph 6.4.11) and that there is no capacity in Chelmsford's proposed Spatial Strategy to accommodate any unmet housing need from neighbouring or nearby local authorities (paragraph 6.4.14). It would seem therefore entirely logical and appropriate to test spatial options that comprise release of land and sites from the Green Belt and/or Green Wedge in order to address unmet neighbouring housing need. As acknowledged in paragraph 6.4.15, even providing the full standard method assessment of 1,454 homes dpa would provide capacity for neighbouring unmet need.
ID	PSIIA-28
Person ID	1380259
Company / Organisation	The Bucknell Family
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Reasonable Alternatives
Question 2 - Please type your comment below:	<p>Settlement Hierarchy</p> <p>3.1 Utilising a settlement hierarchy, to guide the distribution of development within the administrative area, is deemed a logical and conventional approach, which has been successfully employed in the preparation of numerous sound Local Plans in recent years. This method can be a valuable tool for ensuring a sustainable distribution of development, although it is crucial that its application to policies and allocations should not be overly simplistic and should account for broader sustainability considerations.</p> <p>3.2 However, in respect of employment growth, as currently set out the Plan does not consider the objective of promoting a prosperous rural economy and does not recognise that many employment allocations are more sustainably delivered around transport corridors, rather than focusing on a settlement hierarchy, which is generally more appropriate mechanism for directing housing allocations to the most sustainable locations.</p> <p>3.3 Although we broadly agree with the use of a settlement hierarchy to inform decisions regarding the scale of growth directed to various settlements within the Borough, the current wording of the policy text makes it unclear how the settlement hierarchy outlined in Strategic Policy S7 is to be utilised by decision-makers.</p> <p>3.4 If the settlement hierarchy merely provides an explanation for the proposed distribution of growth in the subsequent section of Strategic Policy S7, it might be necessary to remove it from the policy and place it within the reasoned justification. In this context, we wish to highlight a similar issue recently addressed through the examination of the West Suffolk Local Plan. In this case, the settlement hierarchy and dwelling distribution by settlement were included in the submitted policy text. However, one of the Inspectors actions for West Suffolk Council, arising from the examination hearing sessions, was to remove this table from the policy text and place it in the reasoned justification.</p> <p>3.5 While the above represents a potential way to handle the settlement hierarchy, if it serves no function other than justifying subsequent policies or allocations, it does not address concerns that the Local Plan may fail to deliver sufficient homes and employment land to meet community needs.</p> <p>3.6 In this respect, we propose an alternative solution, that better aligns with national policy and would enable the Local Plan to be considered positively, be prepared, maintaining the settlement hierarchy within Strategic Policy S7, accompanied by explanatory text instructing decision-makers to direct additional growth beyond that designated on sites allocated by the Local Plan. For example, it could clarify that potential employment development sites beyond settlement boundaries would still be considered positively, considering the settlement hierarchy and other Local Plan and national policies, and that employment development should also be supported in sustainable locations along existing transport corridors. Such an approach would help mitigate the fact that the submitted Local Plan seeks to provide fewer homes and jobs than the current Standard Method should require to address the housing crisis, addressing the concerns identified regarding Strategic Policy S7.</p>

3.7 One way to reword the current Policy S7 having regard to all of the above, would be as follows: Development will be brought forward in accordance with the Spatial Strategy Development Locations and Allocations, as well as through development within and adjoining existing settlements and in sustainable locations along existing transport corridors having regard to other policies within this Plan and the NPPF, read as a whole.

3.8 The above modifications would need to be made in conjunction with changes to other policies and text within the emerging Local Plan, including that which classifies any land beyond the Defined Settlement Boundaries as Rural Area, and also our suggested amendments to extent of the Green Wedge designation.

3.9 The alternative to the above would be to simply move the settlement hierarchy table to the reasoned justification text but seek to increase the number of new homes and extent of employment land the Local Plan will deliver through alternative means, e.g. by increasing the number of sites allocated for development.

Spatial Strategy Options and the Green Wedge (Policy DM7)

3.10 The Integrated Impact Assessment (IIA) acknowledges in assessing reasonably alternative spatial options, that for the transitional and higher growth levels additional site options over and above the existing Local Plan allocations will be required in order to meet residential and employment needs (paragraph 6.4.29).

3.11 It then goes on to confirm that site options which are situated within the Metropolitan Green Belt and Green Wedge would not be taken forward as part of any spatial options to help meet any residual needs, primarily because there are sufficient and suitable site options outside of the Green Belt and Green Wedge to meet residual needs. However, meeting development needs is not simply a measure of meeting the housing and employment need empirically to accommodate future projected growth, but it needs to be sustainably and evenly distributed amongst the whole authority area, including the rural area, and settlements and locations within the Green Wedge.

3.12 Unlike Green Belt, the Green Wedge is a local spatial designation in Chelmsford for which there is no national planning policy affording Green Wedge the same level of protection as Green Belt in terms of its endurance throughout a plan period and its openness. However, it appears increasingly that Green Wedge designation is being afforded a similar level of weight in its protection across Chelmsford as one would apply for land within the Green Belt, and whilst exceptional circumstances are required to demonstrate whether Green Belt boundaries should be altered through the local plan-making process, the same does not and should not be applied to Green Wedge.

3.13 Whilst openness is one function of the Green Wedge designation, the importance of land within Green Wedge is far more clearly steered towards landscape, environmental attributes and public accessibility, as discussed at paragraphs 6.4.31 – 6.4.33 of the IIA: The Green Wedge contains land that is important for nature conservation, recreation and access. The valleys and flood plain of the Rivers Chelmer, Wid and Can will continue to be protected as Green Wedge through Chelmsford's Urban Area. The existing Green Wedge has played an important role in shaping the form and character of Chelmsford and providing physical links to the countryside. It also provides an important amenity, recreation and nature conservation resource. In line with a Green Wedge Assessment 2017 and a 2024 technical update, the general extent of the existing Green Wedge will be maintained. Part of the Green Wedge is covered by Living Landscapes. These are identified by Essex Wildlife Trust across Chelmsford and contain key areas of landscape which are promoted for nature conservation, wildlife habitats, public enjoyment and adaptation to climate change. It is intended that the crucial role of the main river valleys where they permeate into the existing or proposed urban areas i.e. the Green Wedge, will be protected and enhanced as valued and multi-faceted landscapes for their openness and function as important green networks for wildlife, leisure and recreation, and development which materially harms the role, function, character and appearance of this valued landscape will be restricted.

3.14 Unlike the Green Belt whose primary function is to stay permanently open, the Green Wedge is more environmental, landscape and recreational led, and thus it is reasonable to suggest that large parts of the Green Wedge, including Regiment Park, perform relatively well against the main objectives and characteristics of the Green Wedge for which the designation seeks to protect from harmful development against. However, there are elements of Regiment Park where the land does not perform these Green Wedge functions strongly (generally those parcels proposed for development), and it is considered that the extent of the designation should be amended accordingly.

3.15 While Policy DM7 appears to support a number of forms of development which may be acceptable in the Green Wedge, it is silent on the delivery of new employment buildings. The supporting justification refers to openness, a characteristic of the Green Belt which should not be applied to a local designation such as Green Wedge, in a way which infers Green Belt protections such as very special circumstances apply. Furthermore, at Paragraph B) it refers to maintaining open land between built-up areas and this should be deleted. The revised PPG clarifies that for Green Belt assessments, coalescence between villages is not a Green Belt function. It therefore is not appropriate to imply that Green Wedge should be afforded greater protection than that which is assigned to those parts of the Borough within the Green Belt.

3.16 The stated above purpose of the Green Wedge is a landscape designation to protect the river valleys, nature conservation and facilitate recreation and access. The Policy DM7 should clearly state its purposes and not leave these matters to be covered in the reasoned justification. In addition, it should include a sub paragraph which supports the provision of new employment buildings in appropriate and accessible locations along existing transport corridors.

3.17 The IIA suggests that residual need can be met without the need to explore sites within the Green Wedge. However, as set out above, it only seeks to meet the employment growth associated with Scenario 1 of the Employment Land Review 2024. Furthermore, it should be recognised that the land between Essex Regiment Way and Little Waltham Road should be removed from the Green Wedge as it does not strongly perform the Green Wedge Policy objectives.

3.18 The IIA has failed to properly test all reasonable alternatives and therefore the proposed Spatial Strategy, which has discounted all sites within the Green Wedge without properly assessing them, or the Green Wedge Designation, as a reasonable alternative, is unjustified and unsound.

3.19 However, the Spatial Strategy can be made sound by allocating sites within the Green Wedge and/or amending the extent of the designation, and amending the wording of Policy DM7, in order to support a higher employment growth and in turn meet a higher level of housing need, including the need to help address the unmet housing need of neighbouring authorities.

ID	PSIIA-56
Person ID	1380357
Company / Organisation	Catesby Land and Planning
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Related to Policy S6
Question 2 - Please type your comment below:	<p>Policy S6 of the Chelmsford Local Plan Pre-submission (Regulation 19) document is unsound in terms of the proposed housing requirement since the Plan does not provide for enough new homes to meet Chelmsford's Local Housing Need in full. As a result, it is considered that the Policy is unsound on the basis that it is not Positively Prepared, Justified or Consistent with National Policy.</p> <p>2.2 Policy S6 confirms that the Plan makes provision for a minimum of 22,990 net new homes in the Plan period 2022-2041, equivalent to 1,210 new dwellings per annum. It is confirmed that this housing requirement figure will enable the Council to meet the Transitional Arrangements at paras 234-237 of the December 2024 NPPF (NPPF 2024) which require that Councils meet at least 80% of the Local Housing Need (LHN) calculated via the updated Standard Method.</p> <p>2.3 Catesby object to the Housing Requirement identified within Policy S6 and consider that it is unsound as it is considered that the Policy should meet the Council's LHN calculated based on the new Standard Method in full at the earliest opportunity rather than delaying this to a further review of the Plan. The Council's failure to do so has not been adequately justified and will exacerbate housing affordability in Chelmsford and fail to address the Council's declared Housing Emergency.</p> <p>2.4 The updated Standard Method for calculating Local Housing Needs which was published alongside NPPF 2024 results in a significant uplift in Chelmsford's LHN from 913 dwellings per annum previously to 1,454 new dwellings per annum. Based on the 19-year Plan period, this would result in a total housing requirement of 27,626 net additional dwellings over the period 2022 to 2041.</p> <p>2.5 The Housing Requirement identified within the Policy of 22,990 new dwellings clearly falls significantly short of the full LHN calculated under the new Standard Method, a deficit of 4,636 dwellings. The Council has provided little justification for moving forward with the Plan under the Transitional Arrangements at paragraph 234a of the NPPF rather than delaying the Plan to identify additional sites to ensure the Plan meets the full LHN under the new Standard Method.</p> <p>2.6 In this respect, the Council's stated justification in their Intergrated Impact Assessment as summarised in the Pre-submission Housing Topic Paper is that meeting the higher housing requieiment figure based on the new Standard Method: "Was discounted as it performed poorly overall [against the sustainability objectives] reflecting greater resource use with greater uncertainty overall such as potential oversupply of housing in the plan period, disrupting coordinated delivery against identified need. It would also disturb the balance between housing and jobs provision"</p> <p>2.7 This implies that the Council's decision for the Plan to proceed to Regulation 19 stage and onto Examination without meeting the new LHN in full, is not just a pragramatic attempt to minimise delays to Plan making but a deliberate and contrived attempt to avoid meeting the higher LHN in full because of concerns about environmental harm. It is implied that the Council sees the new LHN as optional rather than mandatory and the suggestions that meeting the LHN in full could lead to an oversupply of new homes is wholly unsubstantiated and is inconsistent with National Policy and not justified by the evidence. In particular, it is considered that this is at odds with both Government objectives in addressing the housing crisis, the Council's own declaration of a housing crises and the housing market evidence within the Council's Strategic Housing Needs Assessment .</p> <p>2.8 Paragraph 60 of the December 2024 NPPF confirms the Government's objective of significantly boosting the supply of homes and that in order to do so it is important that a sufficient amount and variety of land can come forward, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.</p> <p>2.9 The importance and urgency of addressing the housing crisis is underlined in the Ministerial Statement of 12 December 2024 issued alongside the publication of the 2024 NPPF. This highlights the "acute and entrenched" nature of the housing crisis and the need to respond with the urgency this demands.</p> <p>2.10 Moreover, the Council's own evidence base highlights the extent of market and, in particular, affordable housing needs within the District. The Council's Strategic Housing Needs Assessment identifies a need for 623 new affordable dwellings per annum alone, whilst Paragraph 6.6 of the Local Plan highlights that the Council has decared a Housing Crisis and that levels of homelessness are continuing to rise. Similarly, the Council's Housing Topic Paper highlights that housing affordability ratios have risen from 8.17 in 2013 to 11.36 in 2023, way above the National average which is itself at a historically high level.</p> <p>2.11 Catesby consider that the Council is deliberately rushing through the submission of the Local Plan in order to avoid having to meet the full LHN. This is considered to be contrary to the Government's intentions of significantly boosting housing supply in order to meet the objective of delivering 1.5 million new homes by the end of the Parliament in</p>

2029. It is considered that the level of housing proposed is not consistent with this National Government objective, is not justified by the evidence and is not sufficient to meet affordable housing needs.

2.12 Catesby consider that the Standard Method for calculating the LHN should be the minimum starting point in determining the number of new homes that the Local Plan should make provision for. In this case, no Exceptional Circumstances have been identified by the Council to justify not meeting the Council's Local Housing Need in full.

2.13 Catesby therefore consider that the Housing Requirement set out within Policy S6 is unsound as it is not Positively Prepared, Justified or Consistent with National Policy and changes are therefore required to ensure that the Policy and Plan are sound.

ID	PSIIA-10
Person ID	1380324
Company / Organisation	CHP
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Para 5.8
Question 1	No
Question 2 - Please type your comment below:	It is important to highlight an apparent error in the Pre-Submission Integrated Impact Assessment whereby the results in the summary Table 5.8 do not align with the results set out in the full assessment provided in Appendix G.
Question 3	4.3 Subject to confirmation from the Council on which table provides the correct assessment of this site, our client considers the apparent assumption (through the negative air and water quality scores) that building more homes automatically results in an increase in population, to be unsound. There are no known air or water quality issues for this site for example, and as such the score appears to relate to the perceived increase of water usage and/or traffic movements. This would not necessarily be the case should at least the majority of residents already live in Chelmsford. This is particularly likely for the development of Andrews Place as if the majority of units are affordable homes, they will be used to house those in need of housing within the Chelmsford District. Please see accompanying document.
Attachment/s	Final Main Rep 17 03 2025.pdf (3)

ID	PSIIA-36
Person ID	1359674
Full Name	Mr Albert Clarke
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Site 11C
Question 2 - Please type your comment below:	<p>I feel the plan is unsound and object for the following reasons</p> <p>Below is taken from the councils own Intergrated Impact Assessment Plan undertaken by WSP and clearly indicates the site is unsuitable.</p> <p>BICKNACRE CFS158</p> <p>When compared to the preferred sites this site compares less well with the special principles and Special strategy in particular by not respecting the pattern of the existing settlement of Bicknacre. This site would result in more isolated development in the countryside. It would also have poorer access and connectivity to services and facilities available in Bicknacre Village.</p>
ID	PSIIA-37
Person ID	1359674
Full Name	Mr Albert Clarke
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Site 11B
Question 2 - Please type your comment below:	<p>I feel the plan is unsound and object for the following reasons.</p> <p>Below is taken from the councils own Intergrated Impact Assessment Plan undertaken by WSP.</p> <p>Bicknacre 21SHELAA94</p> <p>The development would result in backland development to the north of the village. When compared to the preferred sites this site compares less well with the Spatial principles and Spacial Strategy in particular by not respecting the pattern of the existing settlement of Bicknacre. It would also have poorer access and connectivity to services and facilities available in Bicknacre Village.</p>

ID	PSIIA-18
Person ID	873301
Company / Organisation	Cliffords Group Ltd
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Para 6.4.11
Question 2 - Please type your comment below:	<p>Utilising a settlement hierarchy to guide the distribution of development within the administrative area is deemed a logical and conventional approach, which has been successfully employed in the preparation of numerous sound Local Plans in recent years. This method can be a valuable tool for ensuring sustainable distribution of development, although it is crucial that its application to policies and allocation should not be overly simplistic and should account for broader sustainability considerations.</p> <p>We support the designation of Broomfield as a Key Service Settlement. Key Service Settlements like Broomfield are highly sustainable locations for new housing throughout the Plan period, recognised for their accessibility to a range of services, facilities, and key infrastructure. This is acknowledged both in the adopted Local Plan (2020) and at paragraph 6.27 of the DPD.</p> <p>Although we agree with the use of a settlement hierarchy to inform decisions regarding the scale of growth directed to various settlements within the borough, the current wording of the policy text makes it unclear how the settlement hierarchy outlined in Strategic Policy S7 is to be utilized by decision-makers. 4.4 If the settlement hierarchy merely provides an explanation for the proposed distribution of growth in the subsequent section of Strategic Policy S7, it might be necessary to remove it from the policy and place it within the reasoned justification. In this context, we wish to highlight a similar issue recently addressed through the examination of the West Suffolk Local Plan. In this case, the settlement hierarchy and dwelling distribution by settlement were included in the submitted policy text. However, one of the Inspectors' actions for West Suffolk Council arising from the examination hearing sessions was to remove this table from the policy text and place it in the reasoned justification.</p> <p>While the above represents a potential way to handle the settlement hierarchy if it serves no function other than justifying subsequent policies or allocations, it does not address concerns that the Local Plan may fail to deliver sufficient homes to meet community needs.</p> <p>In this respect, we propose an alternative solution that better aligns with national policy and would enable the Local Plan to be considered positively prepared: maintaining the settlement hierarchy within Strategic Policy S7, accompanied by explanatory text instructing decision-makers to direct additional growth beyond that designated on sites allocated by the Local Plan. For example, it could clarify that potential residential development sites beyond settlement boundaries would still be considered positively, considering the settlement hierarchy and other Local Plan and national policies. Such an approach would help mitigate the fact that the submitted Local Plan seeks to provide fewer homes than the current Standard Method should require to address the housing crisis, addressing the concerns identified regarding Strategic Policy S7.</p> <p>One does not have to look far for a potential example of how such a policy could be set out. In neighbouring authorities' North Essex Authorities' Shared Strategic Section 1 Plan, Policy SP 3 includes the following:</p> <p>"Existing settlements will be the principal focus for additional growth across the North Essex Authorities area within the Local Plan period. Development will be accommodated within or adjoining settlements according to their scale, sustainability and existing role both within each individual district and, where relevant, across the wider strategic area.</p> <p>"Future growth will be planned to ensure existing settlements maintain their distinctive character and role, to avoid coalescence between them and to conserve their setting. Re-use of previously developed land within settlements is an important objective, although this will be assessed within the broader context of sustainable development principles, particularly to ensure that development locations are accessible by a choice of means of travel."</p> <p>The above was found sound in relation to the NPPF 2012.</p> <p>One way to reword the current Policy S7 having regard to all of the above, would be as follows: Development will be brought forward in accordance with the Spatial Strategy Development Locations and Allocation, as well as through development within and adjoining existing settlements having regard to the settlement hierarchy below, as well as other policies within this Plan and the NPPF, read as a whole.</p> <p>The above modifications would need to be made in conjunction with changes to other policies and text within the emerging Local Plan, including that which classifies any land beyond the Defined Settlement Boundaries as Rural Area, and adopts a negative stance to residential development of such.</p> <p>The alternative to the above would be to simply move the settlement hierarchy table to the reasoned justification text, but seek to increase the number of new homes the Local Plan will deliver through alternative means, e.g. by increasing the number of sites allocated for development.</p> <p>Spatial Strategy Options and the Green Wedge</p>

The Integrated Impact Assessment (IIA) acknowledges that to meet residential and employment needs under transitional and higher growth levels, additional site options beyond the existing Local Plan allocations will be required (paragraph 6.4.29).

The IIA confirms that site options within the Metropolitan Green Belt and Green Wedge would not be considered as part of the spatial options to meet residual needs. This, it explains, is primarily because there are sufficient and suitable site options available outside of these areas in order to meet the proposed development requirements. However, meeting development needs is not simply about fulfilling housing numbers to accommodate future growth in purely numerical terms — it is incumbent upon the plan-making process to ensure the Local Plan will do so in a sustainable manner. Case law (e.g. Calverton) confirms that a key factor in determining whether there are exceptional circumstances which justify alterations to the Green Belt is whether it is possible to meet development needs sustainably without doing so.

Green Belt is of course a national designation to which the NPPF attaches great importance.

Unlike the Green Belt, the Green Wedge is a local spatial designation in Chelmsford. There is no national planning policy that gives the Green Wedge the same level of protection as the Green Belt in terms of its permanence and openness throughout the plan period. Consequently, it is even less justified for the plan-making process to simply reject any options entailing development of land within them than it is for the process to automatically reject any development in the Green Belt, without considering the implications of such an approach on achieving sustainable development.

Despite Green Wedge lacking any recognition in national planning policy, and conversely the NPPF expressly confirming that the Government attaches great importance to Green Belt, one could infer from the DLP that it is seeking to afford Green a similar level of protection across Chelmsford as the Green Belt. While altering Green Belt boundaries requires demonstrating exceptional circumstances through the local plan-making process, this is not and should not be the case for the Green Wedge.

Although openness is a function of the Green Wedge, its value lies more in its landscape and environmental attributes, as highlighted in paragraphs 6.4.31 to 6.4.33 of the IIA:

The Green Wedge contains land that is important for nature conservation, recreation and access. The valleys and flood plain of the Rivers Chelmer, Wid and Can will continue to be protected as Green Wedge through Chelmsford's Urban Area. The existing Green Wedge has played an important role in shaping the form and character of Chelmsford and providing physical links to the countryside. It also provides an important amenity, recreation and nature conservation resource. In line with a Green Wedge Assessment 2017 and a 2024 technical update, the general extent of the existing Green Wedge will be maintained.

Part of the Green Wedge is covered by Living Landscapes. These are identified by Essex Wildlife Trust across Chelmsford and contain key areas of landscape which are promoted for nature conservation, wildlife habitats, public enjoyment and adaptation to climate change.

It is intended that the crucial role of the main river valleys where they permeate into the existing or proposed urban areas i.e. the Green Wedge, will be protected and enhanced as valued and multifaceted landscapes for their openness and function as important green networks for wildlife, leisure and recreation, and development which materially harms the role, function, character and appearance of this valued landscape will be restricted. (Emphasis added)

Unlike the Green Belt, whose primary function is to remain permanently open, the Green Wedge is more focused on environmental and landscape qualities. Therefore, it is reasonable to suggest that large parts of the Green Wedge, including Campion Farm, perform poorly against the key objectives and characteristics that the designation seeks to protect from harmful development. It is not justified to simply assume that any loss of Green Wedge is intrinsically unsuitable and / or unsustainable; or that alternatives that do not entail loss of Green Wedge are inherently more sustainable than options which do.

The IIA suggests that residual housing needs can be met without using sites within the Green Wedge. However, it also notes that Chelmsford City Council has received requests from Castle Point Borough Council, Southend-on-Sea City Council, and Basildon Borough Council to help meet their unmet housing needs through Chelmsford's Local Plan allocations (paragraph 6.4.11). The IIA further states that Chelmsford's proposed Spatial Strategy has no capacity to accommodate unmet housing needs from neighbouring authorities (paragraph 6.4.14). Therefore, it would be logical and appropriate to test spatial options involving the release of land from the Green Wedge to help address this shortfall. As acknowledged in paragraph 6.4.15, even providing the full standard method assessment of 1,454 homes per annum would create capacity for some neighbouring unmet need — a scenario based on a spatial option that does not release land for housing from the Green Wedge.

The IIA has therefore failed to test all reasonable alternatives. Discounting all sites within the Green Wedge without properly assessing them as reasonable alternatives makes the proposed Spatial Strategy unjustified and unsound.

However, the Spatial Strategy can be made sound by allocating sites within the Green Wedge, such as Campion Farm, to support higher housing delivery and, in part, help meet the unmet housing needs of neighbouring authorities.

Furthermore, and for the avoidance of doubt, it should be noted that the concerns we have raised in respect of the IIA should not be viewed as fatal to the plan-making process — as confirmed through the Cogent judgment, defects in the SEA process can be addressed, even at an advanced stage in the plan-making process.

Attachment/s	2025 03 17 Chelmsford Reg 19 - Campion Farm.pdf
ID	PSIIA-19
Person ID	873301
Company / Organisation	Cliffords Group Ltd

<p>Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:</p>	<p>Para 6.4.29</p>
<p>Question 2 - Please type your comment below:</p>	<p>The Integrated Impact Assessment (IIA) acknowledges that to meet residential and employment needs under transitional and higher growth levels, additional site options beyond the existing Local Plan allocations will be required (paragraph 6.4.29).</p> <p>The IIA confirms that site options within the Metropolitan Green Belt and Green Wedge would not be considered as part of the spatial options to meet residual needs. This, it explains, is primarily because there are sufficient and suitable site options available outside of these areas in order to meet the proposed development requirements. However, meeting development needs is not simply about fulfilling housing numbers to accommodate future growth in purely numerical terms — it is incumbent upon the plan-making process to ensure the Local Plan will do so in a sustainable manner. Case law (e.g. Calverton) confirms that a key factor in determining whether there are exceptional circumstances which justify alterations to the Green Belt is whether it is possible to meet development needs sustainably without doing so.</p> <p>Green Belt is of course a national designation to which the NPPF attaches great importance.</p> <p>Unlike the Green Belt, the Green Wedge is a local spatial designation in Chelmsford. There is no national planning policy that gives the Green Wedge the same level of protection as the Green Belt in terms of its permanence and openness throughout the plan period. Consequently, it is even less justified for the plan-making process to simply reject any options entailing development of land within them than it is for the process to automatically reject any development in the Green Belt, without considering the implications of such an approach on achieving sustainable development.</p> <p>Despite Green Wedge lacking any recognition in national planning policy, and conversely the NPPF expressly confirming that the Government attaches great importance to Green Belt, one could infer from the DLP that it is seeking to afford Green a similar level of protection across Chelmsford as the Green Belt. While altering Green Belt boundaries requires demonstrating exceptional circumstances through the local plan-making process, this is not and should not be the case for the Green Wedge.</p> <p>Although openness is a function of the Green Wedge, its value lies more in its landscape and environmental attributes, as highlighted in paragraphs 6.4.31 to 6.4.33 of the IIA:</p> <p>The Green Wedge contains land that is important for nature conservation, recreation and access. The valleys and flood plain of the Rivers Chelmer, Wid and Can will continue to be protected as Green Wedge through Chelmsford's Urban Area. The existing Green Wedge has played an important role in shaping the form and character of Chelmsford and providing physical links to the countryside. It also provides an important amenity, recreation and nature conservation resource. In line with a Green Wedge Assessment 2017 and a 2024 technical update, the general extent of the existing Green Wedge will be maintained.</p> <p>Part of the Green Wedge is covered by Living Landscapes. These are identified by Essex Wildlife Trust across Chelmsford and contain key areas of landscape which are promoted for nature conservation, wildlife habitats, public enjoyment and adaptation to climate change.</p> <p>It is intended that the crucial role of the main river valleys where they permeate into the existing or proposed urban areas i.e. the Green Wedge, will be protected and enhanced as valued and multifaceted landscapes for their openness and function as important green networks for wildlife, leisure and recreation, and development which materially harms the role, function, character and appearance of this valued landscape will be restricted.</p> <p>Unlike the Green Belt, whose primary function is to remain permanently open, the Green Wedge is more focused on environmental and landscape qualities. Therefore, it is reasonable to suggest that large parts of the Green Wedge, including land south of Wheelers Hill, perform poorly against the key objectives and characteristics that the designation seeks to protect from harmful development. It is not justified to simply assume that any loss of Green Wedge is intrinsically unsuitable and / or unsustainable; or that alternatives that do not entail loss of Green Wedge are inherently more sustainable than options which do.</p> <p>The IIA suggests that residual housing needs can be met without using sites within the Green Wedge. However, it also notes that Chelmsford City Council has received requests from Castle Point Borough Council, Southend-on-Sea City Council, and Basildon Borough Council to help meet their unmet housing needs through Chelmsford's Local Plan allocations (paragraph 6.4.11). The IIA further states that Chelmsford's proposed Spatial Strategy has no capacity to accommodate unmet housing needs from neighbouring authorities (paragraph 6.4.14). Therefore, it would be logical and appropriate to test spatial options involving the release of land from the Green Wedge to help address this shortfall. As acknowledged in paragraph 6.4.15, even providing the full standard method assessment of 1,454 homes per annum would create capacity for some neighbouring unmet need — a scenario based on a spatial option that does not release land for housing from the Green Wedge.</p> <p>The IIA has therefore failed to test all reasonable alternatives. Discounting all sites within the Green Wedge without properly assessing them as reasonable alternatives makes the proposed Spatial Strategy unjustified and unsound.</p> <p>However, the Spatial Strategy can be made sound by allocating sites within the Green Wedge, such as land south of Wheelers Hill, to support higher housing delivery and, in part, help meet the unmet housing needs of neighbouring authorities.</p> <p>Furthermore, and for the avoidance of doubt, it should be noted that the concerns we have raised in respect of the IIA should not be viewed as fatal to the plan-making process — as confirmed through the Cogent judgment, defects in the SEA process can be addressed, even at an advanced stage in the plan-making process.</p>

Attachment/s[2025 03 17 Chelmsford Reg 19 - Land south of Wheelers Hill.pdf](#)

1359901, Mr, Ivan, Conner

ID	PSIIA-41
Person ID	1359901
Full Name	Mr Ivan Conner
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Appendix G
Question 1	Yes
Question 2 - Please type your comment below:	I agree with the comments next to Bicknacre CFS158 ,which I understand relates to this site, in Appendix G- Appraisal of Proposed Site Allocations and Reasonable Alternatives on page 495. The site (Site 11C) should be removed from the plan.

ID	PSIIA-40
Person ID	1359980
Full Name	
Company / Organisation	Crest Nicholson
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	6.4.9
Question 2 - Please type your comment below:	<p>It is unclear if the Integrated Impact Assessment (IIA) which accompanies the DLP has appropriately considered the higher growth option that would meet the new Standard Method, despite acknowledging that it is a reasonable alternative.</p> <p>The IIA notes six spatial strategy options that were considered, but that it only considers the Site as part of a much larger growth in West Chelmsford, despite the availability of smaller sites to the west of Chelmsford to come forward either individually or as part of more strategic growth.</p> <p>4.5 The NPPF expressly notes that “Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly” (paragraph 70).</p> <p>4.6 The exploration of potential spatial strategies, and the appraisal of options, should not be limited to those that entail large-scale strategic growth to the west of Chelmsford.</p> <p>it is notable that the criticisms and reasons given for the rejection of options that entail large-scale growth to the west of Chelmsford appear largely confined to the provision of employment land at Howe Green, which has been rolled into the option that includes West Chelmsford. In short, the IIA does not justify the rejection of the Site / West Chelmsford as it is required to do, bearing in mind the intended purposes of the IIA as per the NPPF and the requirements of the SEA Regulations.</p> <p>See Arrachment for full rep: 1359980PS-A</p>
Attachment/s	1359980PS-A.pdf

ID	PSIIA-31
Person ID	1380359
Full Name	
Company / Organisation	Crest, Dandara, and TWSL
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Table 6.3 and 6.5
Question 2 - Please type your comment below:	<p>3.1 Strategic Policy S7 can be considered as comprising two elements: the settlement hierarchy; and development locations and allocations. These two elements are considered in turn below.</p> <p>Settlement Hierarchy</p> <p>3.2 The use of a settlement hierarchy to help inform the distribution of development within the administrative area is considered a logical approach, and a conventional one that has been successfully utilised in the preparation of a number of sound Local Plans prepared elsewhere in recent years. It can be a useful tool to ensure a sustainable distribution of development, although it is important that the application of the hierarchy to policies and allocation is not an overly simplistic one, and wider sustainability considerations are accounted for.</p> <p>3.3 Whilst we agree that the use of a settlement hierarchy to help inform decisions regarding the scale of growth to be directed to the various settlements within the borough, as the policy text is currently worded, it is unclear how the settlement hierarchy as set out in Strategic Policy S7 is to be used by decision-makers.</p> <p>3.4 If the settlement hierarchy is simply providing the explanation for the distribution of growth subsequently proposed in the subsequent section of Strategic Policy S7, then it may be necessary for it to be removed from the policy and placed within the reasoned justification. In this respect, we wish to highlight how a near identical issue was recently considered through the examination West Suffolk Local Plan. In the case of this Local Plan, the settlement hierarchy and dwelling distribution by settlement was included as part of a policy in the submitted version. However, one of the Inspectors' actions for West Suffolk Council arising from the examination hearing sessions was for this table to be removed from policy text and placed in the reasoned justification instead.</p> <p>3.5 Whilst the above represent a potential way of addressing the settlement hierarchy if it is not intended for any function other than to provide justification for subsequent policies / allocations, it does not help address concerns in respect that the Local Plan may not deliver sufficient homes to address the communities' needs.</p> <p>3.6 In this respect, we consider there is an alternative remedy that better reflects national policy and would enable the Local Plan to be considered positively prepared: the settlement hierarchy could remain within Strategic Policy S7, but crucially it would need to be accompanied by text explaining that it should be used by decision-makers to direct additional growth beyond that to be delivered on sites the Local Plan allocates. It could, for example, make clear that potential residential development sites beyond the settlement boundaries would still be considered positively, having regard to the settlement hierarchy and other Local Plan, as well as national, policies. Such an approach would provide opportunity to help mitigate the fact the submitted Local Plan seeks to provide far fewer homes than the current Standard Method should use as a minimum requirement in order to address the current housing crisis; helping to address the concerns identified in respect of Strategic Policy S7.</p> <p>3.7 One does not have to look far for a potential example of how such a policy could be set out. In neighbouring authorities' North Essex Authorities' Shared Strategic Section 1 Plan, Policy SP 3 includes the following: "Existing settlements will be the principal focus for additional growth across the North Essex Authorities area within the Local Plan period. Development will be accommodated within or adjoining settlements according to their scale, sustainability and existing role both within each individual district and, where relevant, across the wider strategic area. "Future growth will be planned to ensure existing settlements maintain their distinctive character and role, to avoid coalescence between them and to conserve their setting. Re-use of previously developed land within settlements is an important objective, although this will be assessed within the broader context of sustainable development principles, particularly to ensure that development locations are accessible by a choice of means of travel."</p> <p>3.8 The above was found sound in relation to the NPPF 2012.</p> <p>3.9 One way to reword the current Policy S7 having regard to all of the above, would be as follows: Development will be brought forward in accordance with the Spatial Strategy Development Locations and Allocation, as well as through development within and adjoining existing settlements having regard to the settlement hierarchy below, as well as other policies within this Plan and the NPPF, read as a whole.</p> <p>3.10 The above modifications would need to be made in conjunction with changes to other policies and text within the emerging Local Plan, including that which classifies any land beyond the Defined Settlement Boundaries as Rural Area, and adopts a negative stance to residential development of such.</p>

3.11 The alternative to the above would be to simply move the settlement hierarchy table to the reasoned justification text, but seek to increase the number of new homes the Local Plan will deliver through alternative means, e.g. by increasing the number of sites allocated for development.

3.12 Separately, if the settlement hierarchy is to remain in the policy text and be used by decision-makers, we consider it important that it differentiates between Chelmsford and South Woodham Ferrers. These are two very different settlements, and their inclusion within the same tier of the settlement hierarchy is not considered sound.

3.13 As per the 2021 Census estimates, Chelmsford is a city with a population of 110,606; and South Woodham Ferrers a town with a population of 16,021.

3.14 Strategic new development is being brought forward on the northern edge of Chelmsford, including significant additional infrastructure and service provision. The city's population is rapidly growing, experiencing an increase of 9,019 people between 2011 and 2021, equivalent to an 8.9% increase. Conversely, the population of South Woodham Ferrers is in decline. It experienced a decrease of 424 between the 2011 and 2021 Censuses.

3.15 Chelmsford is the county town of Essex, and functions as a hub for various civic, administrative, legal, and diocesan activities in the county. It is a major centre for higher education, home to an Anglian Ruskin University campus.

3.16 Chelmsford has a large city centre, containing a large number and diverse range of retail, community, and leisure uses, which serve a wide area beyond the borough's administrative boundaries – it has an important role in the wider regional hierarchy. In a 2015 study, it was found to contain 519 units. Conversely, South Woodham has a much smaller centre which attracts residents from a relatively limited geographic catchment area – mainly people who live within 10-minutes of the centre. The same 2015 study found it contained 86 units.

3.17 Chelmsford is “one of the fastest-growing centres for commerce in the East of England”. There are c.87,000 jobs in the city, and it is home to c.12,000 businesses. It also has the highest business startup rate in Essex. In respect of South Woodham Ferrers, the ONS 2021 Census suggests that c.7,000 are employed in and in the surrounds of the town.

3.18 Chelmsford has a railway station (plus an additional station to the north of the centre nearing completion) which provides frequent services to and from London as well as a large number of settlements and other centres in the region. Chelmsford railway station is classified by Greater Anglia as a ‘major’ station and in 2021/22, served over 4.5 million people. South Woodham railway station is classified as a ‘medium’ sized, and serves significantly fewer passengers – just short of 238,000 in 2021/22.

3.19 Whilst the degree to which a settlement hierarchy differentiates between different settlements is not prescribed, if it is to have any meaning in decision-making, clearly it will need to acknowledge the fundamental difference between the city of Chelmsford and the town of South Woodham Ferrers.

3.20 The issue becomes less of a concern if the settlement hierarchy were to be moved outside of the policy text, and used to explain the proposed strategy for growth rather than as part of a policy to manage growth. Development Locations and Allocations

3.21 As noted in Section 2 of this representation, in our response to Strategic Policy S6, the sustainability appraisal (or IIA in this case) has an important role to play in determining a sound spatial strategy for the new Local Plan.

3.22 The IIA includes consideration of most of the Site (as part of a group of sites that have been grouped together as ‘West and North West Chelmsford’) as one of the potential spatial strategies: Option 2c.

3.23 Table 6.3 of the IIA describes Option 2c as follows: Transitional growth includes existing adopted Local Plan allocations, new brownfield and small site options, West and North West Chelmsford (21SHELAA41; CFS165; CFS182 (Part); CFS82; CFS80; 21SHELAA100; 21SHELAA17; CFS183) and Land East and West of the A12, North and North West of Howe Green Sandon (CFS55).

3.24 Table 6.5 of the IIA suggests Option 2c scores very similarly to Option 2a (the selected option).

3.25 The three outline reasons given for the rejection of Option 2c are set out at paragraph 6.4.51 of the IIA, which states, in full: • “Although adjacent to the Chelmsford Urban Area, the sites at West and North West Chelmsford have poorer connectivity into the urban area of Chelmsford, and as such they are relatively isolated from the strategic highway network. There are less [sic] opportunities [to] create sustainable routes to existing public transport or provide new Bus Based Rapid Transit infrastructure. • The sites that comprise the West and North West Chelmsford site option are under multiple ownerships, which may delay delivery and result in piecemeal development. • Employment opportunities would be less accessible to the wider population (for example through public transport).”

3.26 Turning to the first reason given for rejecting the Site, we reject the assertion that development to the west of Chelmsford lacks opportunities to create sustainable routes to existing public transport or provide new public transport infrastructure.

3.27 As set out in the Concept Masterplan for the Site (provided as Appendix A), this includes provision for a new park & ride / mobility hub. In addition, the Site is accessible from across the city for pedestrians and cyclists, and by bus. There are pedestrian and cycle connections into the city via the Chignal Estate and Admirals Park, and to Writtle. These connect the Site to secondary schools, the city centre, and train and bus stations. Existing bus services on Roxwell Road could be diverted into the Site to provide additional connections to the city centre and to Writtle.

3.28 The Site would represent a logical extension to an existing growth location coming forward (West Chelmsford) for which the approved masterplan confirms will include additional footpaths and cycleways, which could also benefit development of the Site.

3.29 In respect of the second reason for rejection, the promoters of the three parcels that comprise the Site are taking a coordinated approach to its development, as demonstrated by the preparation of the Concept Masterplan for the Site and, indeed, by this representation itself.

3.30 Thirdly, in relation to employment opportunities be less accessible (than to the selected employment site at Location 16b) whilst this may be the case, this is only relevant to the Site / West and North West Chelmsford, if one excepts any spatial strategy options entailing a residential-led development of the Site would necessarily have to be accompanied by the employment development at Howe Green, Sandon (CFS55).

3.31 However, it is patently not the case. Indeed, there is nothing to suggest that a residential-led development of the Site in West Chelmsford would be intrinsically linked to provision of employment land at Howe Green (south of Chelmsford). There is no reason, for example, why residential-led development at West Chelmsford along with employment development at Location 16b (the selected employment site) could not be considered a potential spatial strategy.

3.32 It is unclear to what degree this baseless grouping of development at West Chelmsford with employment development at Howe Green into a single option has infected the assessment of the former's sustainability to form part of a spatial strategy for the borough. But the third reason for the rejection of Option 2c demonstrates it has been determinative to at least some degree. Furthermore, the first reason appears more applicable to employment development at Howe Green (somewhat detached from the City) than it does to a westward extension to Chelmsford.

3.33 In effect, the IIA presents a false choice, with West Chelmsford compared with other options only as part of an option that includes employment development at Howe Green.

3.34 Option 3 is considered by the IIA as a higher growth option that combines Options 2a with 2c.

3.35 The clear advantage of this over (or rather, in combination with) the selected Option 2a, is that Option 3 would better reflect the Government's call to maximise the potential for housing delivery as well as addressing affordable housing needs. However, the benefit of this is not reflected in the IIA appraisal of the Site against SA objective 2 – not only is this option scored no better than option that will deliver far fewer homes, but some of the commentary is somewhat negative, with the IIA stating that: "Whilst the provision of a quantum of housing beyond the transitional need is likely to provide additional flexibility in delivery and choice of tenure, over-delivery could be disruptive to the local housing market with demand failing to match supply and potentially stalled developments. As a result, there is an element of uncertainty in relation to Option 3".

3.36 As per our comments in respect of Strategic Policy S6 set out in Section 2 of this representation, the view that an option could deliver too many homes is clearly baseless in the light of current national policy and guidance; particularly when such a number is merely that for which a future Local Plan would be required to deliver.

3.37 Nevertheless, we note that the reasons for rejection of Option 3 do not cite its performance against the housing objective. Instead the reasons given are, in full, as follows: "Option 3 is rejected because: • Lack of strategic highway capacity at Junction 17 of the A12 and no deliverable junction improvements planned to accommodate strategic scale employment growth at this location. • Its relative isolation from existing residential areas, services and facilities which would lead to higher reliance on the use of the private car, including for access to employment. • This location has lower landscape capacity to accommodate employment development compared with the Council's preferred option at Location 16b.

3.38 All of the above reasons appear to relate solely to the inclusion of land at Howes Green, Sandon as an employment allocation, i.e. they fail to consider a higher growth option that includes West / North West Chelmsford, plus Location 16a and 16, but not employment development at Howes Green, Sandon.

3.39 Again, a false choice has been presented – one in which the higher growth option is only an option when it encompasses employment development at a particular location, one deemed unsustainable (or, at the very least, less sustainable).

3.40 The fallacy of the IIA's conclusions is further evident by the fact that in its outline reasons for the rejection of Option 3, it cites Location 16b as being preferable in terms of landscape impacts, when Option 3 includes Location 16b (Land adjacent to A12 Junction 18 Employment Area (21SHELAA5)), as confirmed in IIA Table 6.4.

3.41 There is a potential solution to these issues, and we consider the DLP is still capable of being made sound. The IIA should consider an additional higher growth option, but one that excludes employment development at Howe Green.

3.42 As confirmed through the judgment in Cogent judgment, defects in the SEA process can be resolved, even at a very late stage in the plan-making process.

3.43 However, it should be recognised that an important lesson from Cogent is that where additional work is required to ensure the SEA process complies with the SEA Regulations, it cannot simply amount to an ex post facto exercise which merely justifies the strategy already proposed.

3.44 Consequently, the findings of the further work required on the IIA to address the above concerns will need to be carefully considered by the Council, and the Council will need to propose modifications to the DLP accordingly. Having regard to the findings of the IIA to date, it is difficult to see how a higher growth option which entailed Option 2a plus land at West Chelmsford could not be considered to be the most sustainable option that would better address development needs than simply Option 2a alone.

Attachment/s	Appendix A - Concept Masterplan.pdf West Chelmsford Joint Rep - Chelmsford DLP Reg 19 Final.pdf
ID	PSIIA-32
Person ID	1380359

Full Name	
Company / Organisation	Crest, Dandara, and TWSL
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Para 6.4.9
Question 2 - Please type your comment below:	<p>Housing Needs</p> <p>2.1 Firstly, the local housing need calculation using the Standard Method varies over time. The PPG states that the local housing need calculated using the standard method may be relied upon for plan making for a period of two years from the time that the plan is submitted for examination.</p> <p>2.2 It is of course not known yet when the emerging Local Plan will be submitted for examination.</p> <p>2.3 However, it is pertinent to note that there are two key variables in the calculation of local housing need: dwelling stock estimates (MHCLG Live Table 125); and the ratio of median house price to median gross annual workplace-based earnings, published annually by the ONS. Both of these are updated annually.</p> <p>2.4 In respect of the dwelling stock estimates, the latest figure published in Live Table 125 for Chelmsford is the position as of 31 March 2023: 80,250. The figure for March 2024 is expected to be published May 2025.</p> <p>2.5 Turning to the affordability ratio, the PPG requires the average affordability ratio of the most recent five years for which data is available be used in the local housing need calculation. The most recent affordability ratios were published by ONS on 25 March 2024 and the most recent year for which data is available is 2023. New affordability ratios are due to be published March 2025 (and typically are published towards the end of the month). These will provide data for up to 2024.</p> <p>2.6 It could well be the case that the dwelling stock estimates for Chelmsford will have been updated before the emerging Local Plan is submitted; and it is highly probable that the affordability ratios will have been.</p> <p>2.7 In terms of the calculation of local housing need's sensitivity to such changes, a modest increase in both of the aforementioned variables could result in the proposed housing requirement in the emerging Local Plan no longer being within 80% of the figure generated by the Standard Method.</p> <p>2.8 Separately, the Government explains the reasons for the transitional arrangements for plan-making as follows: "The government's proposed transitional arrangement for local plans seek to maintain the progress of plans at more advanced stages of preparation, while maximising proactive planning for the homes our communities need."</p> <p>2.9 It is evident that the transitional arrangements are not intended to be used as an excuse to unnecessarily restrict development to pre-NPPF 2024 requirement levels. Where there are suitable, available and achievable sites that are able to increase housing delivery closer to the levels required by the NPPF 2024, the emerging Local Plan should support their delivery.</p> <p>2.10 The proposed approach to housing delivery, and the housing requirement in relation to the transitional arrangements, should also be seen in the context of the Written Ministerial Statements of 30 July 2024 and 12 December 2024 in which the current housing crisis and the need for it to be addressed was made clear. The Written Material Statements set out a clear exhortation to take a positive stance to opportunities to deliver housing.</p> <p>2.11 It is also noteworthy how the option to deliver higher growth has been considered through the sustainability appraisal of the DLP, incorporated within the IIA.</p> <p>2.12 The sustainability appraisal (or IIA in this case) is of particular relevance for two reasons.</p> <p>2.13 Firstly, the NPPF (paragraph 32) is clear on the importance of sustainability appraisal in the plan-making process.</p> <p>2.14 Secondly, that the preparation of a new Local Plan is required to comply with the Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No.1633) ('the SEA Regulations'), which transposes the plan-making elements of European Directive 2001/42/EC ('the SEA Directive') into UK law.</p> <p>2.15 The SEA Regulations require that for plans such as the new Chelmsford Local Plan, an Environmental Report is prepared. In this case, the IIA seeks to discharge this obligation.</p> <p>2.16 The Environmental Report is required to identify, describe, and evaluate the likely significant effects on the environment of proposed options, as well as on reasonable alternatives (Regulation 12(2) of the SEA Regulations).</p> <p>2.17 Regulation 12(3) further sets out the information required to be included within the Environmental Report, referencing Schedule 2 of the SEA Regulations. Schedule 2 states that SA/SEA should consider short-, medium- and long-term effects; permanent and temporary effects; positive and negative effects; and secondary, cumulative and synergistic effects.</p>

2.18 As confirmed through case law (see Heard), whilst it is not necessary to keep open all options for the same level of detailed examination at all stages, at each stage the preferred option and reasonable alternatives must be assessed to the same level of detail. This includes considering alternatives for any modifications to a plan, even if late in the plan-making process.

2.19 In terms of the approach taken by the DLP to considering meeting the housing needs the 2024 NPPF, the IIA appears to acknowledge that planning to meet this higher growth figure is as reasonable alternative at paragraph 6.4.9 where it states: “Based on the evidence set out above, it is considered reasonable to explore alternatives for the following levels of housing growth: • Lower growth (approx. 955 dpa or 18,145 total dwellings) based on the SHNA published in 2023 and previous Standard Method. While it could be argued that this is not a reasonable alternative as it is not in line with the revised NPPF and Standard Method, it is being taking forward for further consideration as a number of representations were received from the public on the Preferred Strategy questioning the level of growth proposed in the plan. • Transitional growth (approx. 1,206 dpa or 22,990 total dwellings) based on the housing need identified through the revised Standard Method and transitional arrangements. • Higher growth (approx. 1,406 dpa or 26,714 dwellings) based on the full housing need identified through the revised Standard Method published for consultation in September 2024. The higher level of growth proposed through the December 2024 NPPF and Standard Method has not been considered further at this stage as it was not available in sufficient time for consideration through this report.”

2.20 As per the emphasised text in the preceding paragraph, the IIA appears to confirm that the housing requirement generated by the 2024 NPPF and its accompanying Standard Method is a reasonable alternative, but at the same time admit it has not been assessed, let alone to the same level of detail as the selected option.

2.21 It is questionable whether a perceived inability to assess this option due to purported time constraints is a sufficient reason to fail to assess an option acknowledged to be a reasonable alternative as required by the SEA Regulations.

2.22 Notwithstanding the above and the commentary within the IIA at paragraph 6.4.9., we note that the IIA has assessed a higher growth scenario, albeit in the context of options for the spatial strategy. Spatial Strategy Option 3.

2.23 It is somewhat unclear what Spatial Strategy Option 3 assessed entails. At Table 6.3, the IIA states that Option 3 includes an increased number of dwellings in a number of locations, including West and North West Chelmsford. It confirms this option includes elements that make up the Site: 21SHELAA41, CFS165, and party of CFS182.

2.24 Conversely, and seemingly directly contradicting Table 6.3, in Table 6.4 of the IIA it reports that Spatial Strategy Option 3 would involve provision of zero additional homes in West and North West Chelmsford; but that it would encompass provision of additional employment floorspace.

2.25 Irrespective of this, and focussing on the matter of housing quantum only (as opposed to spatial strategy), the commentary on page 186 of the IIA provides the following view on Option 3: “The higher growth option (Option 3) performs more poorly overall reflecting greater resource use with greater uncertainty overall such as potential oversupply of housing in the plan period disrupting coordinated delivery against identified need”

2.26 There are two elements to the above that merit comment.

2.27 Firstly, the IIA refers to an “oversupply”. We consider that in the context of the Government’s clear exhortation to maximise provision of housing, any criticism of an option on the basis it would provide too many homes, without identifying any specific harm with such an approach is fundamentally flawed.

2.28 Secondly, it is unclear what is meant by an oversupply of homes “disrupting co-ordinated delivery against identified need” – a Local Plan with a higher housing requirement would be able to provide a coordinate approach to meeting a higher figure.

2.29 For the above reasons, and having regard to other sustainable and deliverable sites that the emerging Local Plan does not currently propose to allocate (discussed further within Section 3) the proposed housing requirement is not considered sound.

2.30 We consider this is a defect that can be readily addressed through amending the housing requirement such that it better reflects opportunities for development in the administrative area, and ensures a buffer such that the new Local Plan can be progressed with confidence that it will remain, at the very least, within 80% of the annual housing requirement generated by the Standard Method.

2.31 Alternatively / additionally, the aforementioned soundness concerns could potentially be addressed through an additional policy, committing the Council to an immediate review of the Local Plan, potentially with the sole aim of increasing housing needs.

2.32 An immediate review policy was considered the appropriate mechanism for addressing concerns identified through the Brentwood Local Plan’s examination that it would not meet housing needs. In the case of the Brentwood Local Plan, such an approach was found to be “necessary and pragmatic”. However, one concern with such an approach is how effective it would be in ensuring issues are addressed in a timely manner. We note, for example, that the deadline for Brentwood Borough Council to submit its update to its Local Plan for examination has not been met.

Attachment/s

[West Chelmsford Joint Rep - Chelmsford DLP Reg 19 Final.pdf](#)
[Appendix A - Concept Masterplan.pdf](#)

ID	PSIIA-39
Person ID	1326599
Company / Organisation	Dandara
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Para 6.4.40
Question 2 - Please type your comment below:	<p>The evidence base supporting the draft Plan does not present convincing evidence to justify the decision to allocate Hammonds Farm in favour of other options West of Chelmsford that are better connected to existing services. The Integrated Impact Assessment suggests that housing growth at West Chelmsford was only considered in one of the six spatial strategy options tested. This was Option 2(c), where 3,000 dwellings would have been delivered at West and North-West Chelmsford (21SHELAA41; CFS165; CFS182 (Part); CFS82; CFS80; 21SHELAA100; 21SHELAA17; CFS183), including on Dandara's land. It suggests that this option was rejected because:</p> <p>“Although adjacent to the Chelmsford Urban Area, the sites at West and North-West Chelmsford have poorer connectivity into the urban area of Chelmsford, and as such they are relatively isolated from the strategic highway network. There are less opportunities create sustainable routes to existing public transport or provide new Bus Based Rapid Transit infrastructure.</p> <p>The sites that comprise the West and North-West Chelmsford site option are under multiple ownerships, which may delay delivery and result in piecemeal development Employment opportunities would be less accessible to the wider population (for example through public transport).” Para 6.4.51</p> <p>2.31 Dandara disputes these findings, for the following reasons:</p> <p>The sites cannot be considered to have poorer connectivity to the Chelmsford's urban area. Not only are they more proximate to it, enabling genuine opportunities to walk or cycle to Chelmsford City Centre and access other services and facilities in its urban area, they are located directly adjacent to existing public transport routes and other infrastructure. This position is supported the Council's own Sustainable Accessibility Mapping and Appraisal evidence base document 2022 (document T003), which scored eight potential development locations. The Edge of Chelmsford extension (which included West Chelmsford and East Chelmsford) scored fourth best. Only the brownfield development options in the urban area, North-East Chelmsford and South Woodham Ferrers scored better. Location 8, the Hammonds Farm option, scored second worst.</p> <p>The ownership structure of the sites at West and North-West Chelmsford will not significantly impinge upon their delivery timeframes or risk piecemeal development. Dandara alone</p>

controls 81 hectares of land at North-West Chelmsford that can deliver a sustainable new neighbourhood of around 850 new homes. It could come forward in isolation, or as part of a wider allocation to include land to the south and south-west controlled by Taylor Wimpey and Crest Nicholson. All three developers are collaborating on the promotion of these sites, demonstrated by the submission of joint representations on the Plan (under separate cover) and a development option that includes delivery of an additional road link through the three sites between the A1060 and Chignal Road. Concerns about multiple land ownerships should not be a reason to discount growth at West and North-West Chelmsford.

The main employment opportunity proposed at Hammonds Farm is the separate employment site 16b, located adjacent to junction 18 of the A12. This could come forward without the wider residential-led allocation. In any case, whilst this location is accessible from the A12, it is poorly connected the population of Chelmsford's urban area by anything other than carbased transport.

The Council and the Inspector must consider the benefits of development at West and North-West Chelmsford more thoroughly before the Plan can be found sound. The soundness of the decision to allocate a new settlement away from Chelmsford's urban area ahead of any further allocations to the west of Chelmsford is particularly concerning given that a major allocation at West Chelmsford (Warren Farm) was found to be the preferred solution in the adopted Local Plan just five years ago. This decision was taken partly due to its proximity to the City Centre and the unique opportunity presented by this location to provide access to central Chelmsford (and other services to the west, such as Morrisons and other facilities at Newlands Spring and Melbourne) on foot or by bicycle. The Council should be prioritising active, sustainable travel over access to the strategic road network, otherwise it will simply end up with car-dependent, dispersed patterns of development. By contrast, incremental extensions to the West Chelmsford growth location would be entirely logical to maximise the opportunity to provide access to the city via active travel and ensure that new development is integrated with existing facilities and infrastructure.

2.33 Further development here also presents opportunities to enhance the highway network and connections between the A1060 and Broomfield (relieving pressure on Chignal Road) alongside the delivery of public transport improvements and new park and ride facilities, as explained

elsewhere. These opportunities must be fully explored before the Plan is finalised.

See Attachment 1326599PS-A for full rep.

Attachment/s	1326599PS-A (Part 1).pdf
ID	PSIIA-52
Person ID	1326599
Company / Organisation	Dandara
Consultation point - Please state the relevant paragraph/table/figure/appendix	Chapter 5

to the IIA your comment relates to:

Question 2 - Please type your comment below:

3.1 The Integrated Impact Assessment (IIA) prepared by WSP on behalf of Chelmsford City Council comprises Sustainability Appraisal incorporating Strategic Environmental Assessment, a Health Impact Assessment, an Equalities Impact Assessment and Habitats Regulations Assessment and sets out the planning issues that face the Council over the next 15 years and the proposed strategy for the way they could be addressed.

3.2 The IIA has been prepared to meet the requirements of the Strategic Environmental Assessment (SEA) Regulations and ensures that the legal requirements the Chelmsford Local Plan need to be subject to during preparation are adhered to.

3.3 To support the assessment of the Local Plan, an Assessment Framework has been developed. This contains a series of sustainability objectives and guide questions that reflect both the current socio-economic and environmental issues which may affect (or be affected by) the Local Plan and the objectives contained within other plans and programmes reviewed for their relevance to the IIA and the Local Plan. The Assessment Objectives are then subject to a scoring system identifying both positive and negative effects against each objective.

3.4 Chapter 5 of the IIA sets out the assessment of the proposed growth areas and associated proposed site allocations. As mentioned in earlier parts of these representations, part of Land East of Pleshey Road, Ford End has been allocated within the Pre-Submission Local Plan for 20 dwellings.

3.5 Table 5.9 provides a summary of the appraisal of proposed allocations in Growth Area 2 – North Chelmsford. The table has identified that the site allocation at Ford End (under Policy 14 b) would make a very positive contribution to the IIA priority of providing more homes in Chelmsford. The assessment notes the site allocation also provides a positive contribution toward sustainable living and revitalisation, as well as mixed, minor or uncertain impacts on biodiversity, health and wellbeing and transport. The site allocation would have a small negative impact on cultural heritage and landscape and townscape. The only major negative impact identified in the assessment relates to land use. Further commentary and explanation of this appraisal is provided at various points in the IIA.

3.6 Dandara agree that the allocation of the site at Ford End will have benefits towards the housing supply and the sustainability and revitalisation of the village of Ford End. We do, however, consider that the IIA should also recognise the benefits to biodiversity which will be provided through the provision of 10% BNG as well as benefits to transport which will be delivered through appropriate highway improvements and measures to promote and enhance active travel. Equally, the development of the site would also provide benefits to the local economy through use of local firms for construction as well as the new residents providing enhancement to the local economy through use of local facilities and services. It is considered the impacts to cultural heritage should be considered neutral as the site allocation already requires a scheme which is sensitive to the non-designated heritage asset of Ford End Primary School.

3.7 The IIA concludes that the Site complies well with the Strategic Priorities, Vision, Spatial Principles and Spatial Strategy, in particular with regard to the Settlement Hierarchy. The Site is also supported by the evidence base for the Plan, such as the Heritage Assessment and Landscape Capacity and Sensitivity Assessment. Overall, the IIA has not found any constraints which would hinder the deliverability, viability or availability of the site. Dandara completely support and agree with these conclusions.

3.8 The wider Site which was submitted to the Call for Sites, as well as promoted through the previous Local Plan consultations, covered 5.37 hectares and has the capacity to provide up to 50 homes. This iteration of the IIA no longer provides comment on the reasoning behind not including further land within the allocation, as was included in the IIA provided with the Preferred Options consultation. This set out the following reason for why the wider part of the site has been discounted:

The remaining non-allocated part and the southern parcel extend to the south. They are further away from the DSB and would not respect the existing settlement pattern of Ford End. The full site is greater than 1 hectare in size.

3.9 The Vision Document at Appendix 1 of this report demonstrates that the Site is capable of coming forward with a layout which is sensitive to the existing settlement pattern of Ford End. The masterplan focuses development to the north of the site, with large areas of open space and biodiversity corridors to the south. The larger allocation would allow for best-practice place-making strategies, allowing the proposals to adapt to local circumstances and the opportunities on the site, and would require the creation of artificial boundaries rather than using the existing hedgerows.

3.10 Furthermore, we recognise that the NPPF at paragraph 73 a) requires Local Planning Authorities to accommodate 10% of their housing requirements on sites no larger than 1 hectare. We also support that the Council is identifying sites which are 1 hectare, however, we query the type of sites which have been selected for this. We specifically query the inclusion of Land East of Pleshey Road which is able to provide many benefits as a larger site such as land for the primary school, extensive open space, as well as the provision of

more affordable and market homes. We believe that this requirement in the NPPF is primarily concerning sites which would form infill development, or smaller brownfield sites within urban areas. The reasoning behind the paragraph is to ensure that sites can be delivered quickly, not to limit the number of homes which are delivered overall or limit the most effective use of land.

3.11 Land East of Pleshey Road, Ford End is under option by Dandara, a national housebuilder who intends to progress with the Site swiftly once the Plan has been adopted. The Site is predicted to be delivered within 5 years from the adoption of the Plan, and we consider that a larger allocation of the site is necessary to combat the risk identified in the current Plan which has planned for the majority of growth in North Chelmsford to be delivered through the Garden Community, which is at high risk of being delayed, especially

	<p>when considering how delayed the strategic sites allocated in the 2020 adopted Local Plan have been. We therefore suggest that further land is allocated within the Ford End allocation.</p> <p>3.12 The IIA has demonstrated that allocation of Land East of Pleshey Road, Ford End is in accordance with Pre-Submission Local Plan objectives and scores well in their assessment with beneficial impacts on housing supply and the sustainability of Ford End, whilst also not having any constraints associated with its deliverability (although this assessment is only considering 1 hectare of the site, we argue that this is applicable to the site as a whole). We therefore urge the Council to reconsider a larger allocation at Land East of Pleshey Road, Ford End.</p> <p>See Attachment for full rep: 1326599PS-A (Ford End)</p>
Attachment/s	1326599PS-A (Ford End)

ID	PSIIA-48
Person ID	1253060
Full Name	
Company / Organisation	Dandara Eastern
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Section 6
Question 2 - Please type your comment below:	<p>The approach taken by the council in order to meet the housing needs in the 2024 NPPF is set out in Section 6 of the Integrated Impact Assessment (IAA). It appears to acknowledge that planning to meet this higher growth figure is as reasonable alternative at paragraph 6.4.9 where it states:</p> <p>“Based on the evidence set out above, it is considered reasonable to explore alternatives for the following levels of housing growth:</p> <ul style="list-style-type: none"> • Lower growth (approx. 955 dpa or 18,145 total dwellings) based on the SHNA published in 2023 and previous Standard Method. While it could be argued that this is not a reasonable alternative as it is not in line with the revised NPPF and Standard Method, it is being taking forward for further consideration as a number of representations were received from the public on the Preferred Strategy questioning the level of growth proposed in the plan. • Transitional growth (approx. 1,206 dpa or 22,990 total dwellings) based on the housing need identified through the revised Standard Method and transitional arrangements. • Higher growth (approx. 1,406 dpa or 26,714 dwellings) based on the full housing need identified through the revised Standard Method published for consultation in September 2024. The higher level of growth proposed through the December 2024 NPPF and Standard Method has not been considered further at this stage as it was not available in sufficient time for consideration through this report.” (Emphasis added). <p>The emphasised text above appears to confirm that the housing requirement generated by the 2024 NPPF and its accompanying Standard Method is a reasonable alternative, but at the same time admit it has not been assessed.</p> <p>Notwithstanding the above and the commentary within the IIA at paragraph 6.4.9., we note that the IIA has assessed a higher growth scenario, albeit in the context of options for the spatial strategy, Spatial Strategy Option 3.</p> <p>See Attachment for full rep: 1253060PS-A</p>
Attachment/s	1253060PS-A.pdf

ID	PSIIA-51
Person ID	1155857
Full Name	
Company / Organisation	Environment Agency
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Section 3.8
Question 2 - Please type your comment below:	<p>Water Quality</p> <p>We are generally satisfied with the Integrated Impact Assessment section 3.8, Water. We are pleased to see there was a 2024 update to the Chelmsford Water Cycle Study. Section 3.8.9 covers the serving Water Recycling Centre (WRC) and their current capacity. We are pleased to see identification of required upgrades and revised quality permit conditions, and phasing where necessary.</p> <p>We would encourage communication with Anglian Water about planned upgrades, especially within the AMP8 programme (2025-2030), and reviewing their Drainage and Waste Water Management Plan (DWMP).</p>

ID	PSIIA-3
Person ID	1253368
Full Name	
Company / Organisation	Essex Police
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	3.4 (3.4.8)
Question 2 - Please type your comment below:	The document notes that crime can influence health, wellbeing, and deprivation. It is recommended when developing new communities there is engagement with the DOCO to ensure crime is designed out in the early stages. Similarly, engagement with the DOCO can be used to evidenced strategic statements within the Health Impact Assessment. For full representation see attachment 1253368PS-A – Essex Police DOCO.
Attachment/s	1253368PS-A - Essex Police DOCO.pdf
ID	PSIIA-4
Person ID	1253368
Full Name	
Company / Organisation	Essex Police
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	3.5 (3.5.20)
Question 2 - Please type your comment below:	The document notes that crime can influence health, wellbeing, and deprivation. It is recommended when developing new communities there is engagement with the DOCO to ensure crime is designed out in the early stages. Similarly, engagement with the DOCO can be used to evidenced strategic statements within the Health Impact Assessment. For full representation see attachment 1253368PS-A – Essex Police DOCO.
Attachment/s	1253368PS-A - Essex Police DOCO.pdf
ID	PSIIA-5
Person ID	1253368
Full Name	
Company / Organisation	Essex Police
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	5.2
Question 2 - Please type your comment below:	Please note, that whilst this is a separate document, all previous comment in relation to the Local Plan Review correlate to this priority. For full representation see attachment 1253368PS-A – Essex Police DOCO.

Include files	1253368PS-A - Essex Police DOCO.pdf
ID	PSIIA-6
Person ID	1253368
Full Name	
Company / Organisation	Essex Police
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	5.5
Question 2 - Please type your comment below:	<p>Early engagement with the DOCO is recommended to ensure the growth has a minimal impact on policing and is designed so future residents and visitors feel safe in their homes and community.</p> <p>For full representation see attachment 1253368PS-A – Essex Police DOCO.</p>
Include files	1253368PS-A - Essex Police DOCO.pdf
ID	PSIIA-7
Person ID	1253368
Full Name	
Company / Organisation	Essex Police
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Appendix J
Question 2 - Please type your comment below:	<p>Core Standard 1; Core Standard 2; Core Standard 3:</p> <p>The DOCO welcomes the acknowledgement within the Health Impact Statement that developers are required to ‘create a safe and accessible built environment with well-designed public spaces that encourage community participation and designing out crime measures.’</p> <p>It is advised that for SBD measures to be fully incorporated into schemes then there is engagement with the DOCO in the early stages and an SBD award applied for at the appropriate stage. This would support core standard 2 as new or refurbished active routes can be designed to be inclusive, safe, and sustainable. This would further align with the VAWG strategy which has previously been alluded to within this document.</p> <p>Using SBD products can support environmental and sustainability initiatives. (This has been detailed in section 3.2 ‘Strategic priorities’ of this document.)</p> <p>For full representation see attachment 1253368PS-A – Essex Police DOCO.</p>
Attachment/s	1253368PS-A - Essex Police DOCO.pdf

ID	PSIIA-53
Person ID	1301644
Full Name	
Company / Organisation	Gladman Developments Ltd
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Reasonable Alternatives
Question 2 - Please type your comment below:	<p>(full response including details of consultee's site in attachment)</p> <p>Gladman contend that the IIA currently fails to meet the requirements of National Policy Guidance, the 2004 Regulations and the Directive and as a result the Chelmsford Local Plan Review cannot therefore be considered an appropriate strategy for the purposes of NPPF Paragraph 36. The reasons for this view will be discussed below.</p> <p>Assessment of Reasonable Alternatives</p> <p>The assessment of reasonable alternatives has not been achieved in three ways:</p> <ul style="list-style-type: none"> - Failure to sufficiently test alternative growth scenarios - Failure to sufficiently test alternative employment needs - Failure to accurately and consistently test spatial options <p>Failure to test sufficient alternative growth scenarios</p> <p>The IIA has failed to test sufficiently alternative housing requirements in isolation, instead opting to test one single housing requirement of 1,240 .in order to meet the transitional arrangements.. Table 5.2 outlines how this requirement performs against the assessment objectives to conclude that this requirement is suitable.</p> <p>Notwithstanding the lack of justification for pursuing this figure beyond it being 80% of the new standard method figure, to not test lower or higher growth scenarios is incorrect.</p> <p>Table 6.3 outlines the spatial strategy options and provides the total number of dwellings each option could provide. Gladman consider this incorrect and the housing requirements should be tested in isolation, and not as part of the spatial strategy options.</p> <p>Rather, the IIA should have explored three growth options in isolation of the spatial strategy (as a minimum); the previous standard method figure of 913 (should the Council be pursuing examination under NPPF 2023), the proposed figure of 1,210 (with appropriate justification for the uplift) or the emerging standard method figure of 1,454. Failure to do so results in the housing requirement being unjustified and undermines the IIA as a whole. Based on this, Gladman do not consider that the legal</p>

requirement has been met.

Gladman have significant concerns for the justification in not testing these reasonable alternatives. The Council claim that 'the higher level of growth proposed through the December 2024 NPPF and Standard Method has not been considered further at this stage as it was not available in sufficient time for consideration through this report' Yet, the report is based on meeting the transitional arrangements as per the very same NPPF that wasn't available in time. The transitional requirements were changed from 200 dwellings less than standard method to 80% of the standard method. Gladman contend that if the Council have had enough time to amend the report based on this amendment, then there was also time to test the new standard method figure as a reasonable growth alternative. At the very least, due consideration should have been given to the proposed standard method figure (July 2024) of 1,406.

Failure to test alternative employment needs

As above, rather than suitably testing a low, medium and high employment needs scenario as a minimum and in isolation, the IIA has tested just one scenario in full. Rather than being incorporated as part of the spatial strategy options, Gladman consider that these alternatives must also be tested in isolation to ensure that the most sustainable option has been progressed.

Failure to accurately and consistently test spatial options

Gladman do not consider that sufficient assessment of the reasonable alternatives to the Hammonds Farm site have been considered therefore, there is not sufficient evidence to suggest that this is the most sustainable option when compared with other large scale strategic sites available in the area.

Had further work been undertaken, Gladman contend that it would be likely evident that the Hammonds Farm allocation would not represent the most reasonable approach.

The five spatial strategies that were then rolled forward in to 5 low, transition, high scenarios with limited differentiation between the sites included. Recognising that there would be a large number of potentially hybrid strategies an element of planning judgement therefore needs to be applied, Gladman contend that the hybrid strategies should be revisited, and the exercise undertaken again.

We would suggest an alternative strategy to Hammonds Farm as strategic growth at Boreham, Howe Green, East Hanningfield, Rettendon, Bicknacre and Danbury. Assessment of such a hybrid strategy should be afforded the same flexibility in terms as mitigation as that of the Hammonds Farm option. As for example, the current hybrid strategy discounts sites for highways capacity or relative isolation yet these are the exact issues that Hammonds Farm will have to address. Development of sites in these locations would provide the infrastructure required, flexibility afforded to the assessment of Hammonds Farm but in a more dispersed way so that there is less

reliance on any one location to deliver the future housing growth of the Local Plan Review.

There is also a lack of testing in terms of higher growth scenarios to accommodate unmet needs from neighbouring authorities, this is crucial in determining whether the duty to cooperate has been fulfilled and whether the Council have done enough to prove that they cannot assist neighbours.

Attachment/s

[1301644PS-A.pdf](#)

ID	PSIIA-55
Person ID	1348892
Full Name	
Company / Organisation	Hallam Land Management
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Reasonable Alternatives
Question 2 - Please type your comment below:	<p>(full response including details of consultee's site in attachment)</p> <p>5.1 HLM is supportive of the continued development and growth at Chelmsford Garden Community (draft Local Plan Policy SGS 6), with that development being led by Ptarmigan Land, Countryside, L&G and Halley Developments, as a continuation of previous delivery known as Beaulieu and Channels.</p> <p>5.2 Consistent with the spatial strategy of the draft Local Plan, but necessary to address matters of soundness identified above, there is opportunity for residential led development (in the order of 1,250 – 1,500 homes dwellings) on land to the north of Wheelers Hill (the Site). This would enable the further expansion of Chelmsford Garden Community with its proven:</p> <ul style="list-style-type: none"> • achievability through effective working arrangements with a limited number of landowners – in this instance there would be a single landowner across the Site; • planning of significant infrastructure; and • positive sustainable effects across social, environmental and economic objectives. <p>5.3 Where future residential development on the Site should be recognised, if not allocated in the draft Local Plan at this stage, then other modifications should be made to SGS Policy 6 (Chelmsford Garden Community) to (at the very least) require the masterplanning of the allocation to identify / highlight where future growth to the north of the Site should come forwards. To continue the sustainable principles of Chelmsford Garden Community, this area of future growth should be identified on the Key Diagram (Figure 14) and the 'Growth Area 2 – North Chelmsford' inset map (Figure 17) of the draft Local Plan.</p> <p>5.4 A Concept Strategy for the Site has been prepared by Hallam Land (Appendix B), which provides a general approach of how development on the Site could be arranged. This includes:</p> <ul style="list-style-type: none"> • the continuation of built development beyond (to the north of) Wheelers Hill for 1,250 – 1,500 homes dwellings; • principal access to the Site via the new Northern Radial Distributor Road being delivered by committed development at Chelmsford Garden Community; • new local facilities – including local centre with retail and community uses, multimodal travel hub and pre- and primary school provision; • opportunity to route bus services through the centre of the Site; • a network of active travel links providing connections south to other part of Chelmsford Garden Community, west to Little Waltham and Broomfield, and east to connect to a wider public right of way network. This would allow for direct and quick access to Beaulieu railway station, park and ride facilities, and employment opportunities whether within Chelmsford Garden Community, Chelmsford itself or other towns and cities; • a substantial network of green infrastructure, integrated with other areas of Chelmsford Garden Community and the restoration of Sheepcotes Quarry to the north. This would provide significant leisure, recreation and sporting opportunities, as well as space for nature and a net gain in biodiversity. <p>5.5 To the north of the Site, the Concept Strategy shows how natural landscape features including Sheepcotes Wood and Titelands Wood would robustly contain the built form / expanded area of growth in this more sensitive direction. To the east, development would be contained by the alignment and realisation of the CNEB.</p>

5.6 The Site is well-placed to coordinate with the four-stage delivery programme for the Chelmsford Garden Community, as set out in the Development Framework Document. This envisages the first stage of development being delivered by 2030 in the northern extent of the allocation that would see residential development, the Northern Radial Distributer Road, Channels Discovery Park and Sports Hub alongside education, healthcare and service provision.

5.7 Despite the Council acknowledging in its Strategic Housing Employment Land Availability Assessment (SHELAA) that development on the Site is achievable, and where there is clear opportunity to provide new local services and expand bus services from the adjacent Chelmsford Garden Community, the Council has not considered the Site in the IIA as a reasonable alternative for development.

5.8 Hallam Land however considers that had this process been carried out, it should have scored the Site highly against sustainable objectives, in a similar way to how draft Local Plan Policy SGS Policy 6 (allocating growth at Chelmsford garden Community) has been assessed by the IIA, effectively as a 'sustainability appraisal' of the environmental, social and economic performance of the allocation. As presented at Table 1 (see attachment), many significant positive effects of development are identified, with weaker scoring including on loss of agricultural land, water usage and landscape considered unavoidable when having to provide for housing needs.

5.9 Hallam Land considers the IIA to demonstrate the positive overall sustainability of strategic growth at Chelmsford Garden Community promoted by the draft Local Plan, consistent with the success the Council has had in delivering its initial phases. The IIA also justifies and reinforces the opportunity of the Site (of land north of Wheeler Hill) to expand that growth further, as highlighted by these representations above.

Attachment/s

[1348892PS-A.pdf](#)

ID	PSIIA-24
Person ID	1380379
Full Name	
Company / Organisation	Hill Residential Ltd
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Reasonable Alternatives
Question 2 - Please type your comment below:	<p>Summary</p> <p>3.1 The Draft LP's spatial strategy is fundamentally flawed, primarily due to its overemphasis on protecting the Green Belt, which undermines the Plan's promotion of the most sustainable patterns of development within the district. As drafted the Draft LP is not sound and does not meet its legal requirement to be prepared with the objective of contributing to the achievement of sustainable development. We say this because: • the Spatial Strategy at Policy S7 is not based on a review of all reasonable alternatives and is, therefore, not justified; • To be found sound, the Plan and its evidence base must assess the release of Green Belt land around Key Service Settlements as a spatial scenario. Completing this analysis will reveal the significant benefits of a more sustainable pattern of development. This will not only justify the need for Green Belt release around Key Service Settlements such as Writtle, but also demonstrate the presence of exceptional circumstances.</p> <p>The Sustainability Assessment (SA) process negates the need to assess and consider sustainable patterns of development that include potential Green Belt Land</p> <p>3.2 The process for identifying the Draft LP's spatial strategy wrongly inflates the protection of the Green Belt above the need to identify sustainable patterns of development. We consider that sustainable patterns of development should firstly be identified; and only then, should the implications of protecting the Green Belt be considered.</p> <p>3.3 The Council's flawed process effectively provides a false justification for the Council to avoid releasing politically sensitive Green Belt land around Chelmsford. Consequently, this approach has excluded far more sustainable locations such as higher tier Key Service Settlements such as Writtle, which are otherwise sustainably located in close proximity to Chelmsford as well as having their own services and facilities - thereby reducing the need to travel.</p> <p>3.4 There is an exquisite irony in identifying higher tier key service settlements for their sustainability credentials and then deliberately excluding they settlements without consideration as reasonable alternatives.</p> <p>3.5 Ultimately, this has deprived the community of the opportunity to consider the balance between the benefits of delivering sustainable patterns development in meeting Chelmsford's housing needs with the protection of the Green Belt.</p> <p>The Sustainability Assessment fails to assess all Reasonable Alternatives</p> <p>3.6 The Draft LP has not assessed the release of sustainable settlements within the Green Belt. The Plan's spatial strategy has been arrived at based on a political direction that no Green Belt land in Chelmsford can be released. To this end, the Sustainability Appraisal (SA) (contained within the Integrated Impact Assessment) undertaken by the Council raises the importance of the maintaining the Green Belt above the provision of sustainable development, by deliberately excluding sustainable Key Service Centres in the Green Belt.</p> <p>3.7 As a result, the SA is inadequate in terms of its assessments of the likely effects of the Plan's policies and its consideration of Reasonable Alternatives. By not assessing the most sustainable spatial scenario of distributing development to higher tier Key Service Settlements within the Green Belt, the SA fails to provide a range of Reasonable Alternative spatial scenarios. This has led to the draft housing allocations not being selected in preference to possible alternatives, based on a robust, objective and consistent approach and the Draft LP is unjustified and, therefore, unsound.</p> <p>3.8 The Plan's Spatial Strategy at Strategic Policy S7 identifies a settlement hierarchy for Chelmsford.</p> <p>3.9 At the top of the hierarchy is Chelmsford and South Woodham Ferrers. Key Service Centres are the second tier in the settlement hierarchy, followed by Service Settlements and finally Small Settlements.</p> <p>3.10 The Plan (para 6.26) describes Key Service Centres as being the: "focus for housing provision outside Chelmsford and South Woodham Ferrers, with a higher level of growth due to their higher level of services, facilities and economic activity. Growth in Key Service Settlements aims to increase their self-containment and enhance their service role, reflecting the aspirations of national policy in promoting stronger communities."</p>

3.11 However, the Plan then splits Key Service Settlements between those “outside” and those “within” the Green Belt. Land around those Key Service Settlements within the Green Belt are not considered as part of any reasonable alternative spatial scenario by the SA. Consequently, the Draft LP has not assessed the impact of severely limiting the Plan’s objective of increasing “their self-containment and enhance their service role, reflecting the aspirations of national policy in promoting stronger communities”. It is counterintuitive to identify sustainable settlements but then place restrictions on development opportunities.

3.12 As a Key Service Settlement, Writtle has strong connections and physical relationships with Chelmsford being in close proximity to the City and benefits from a range of services and facilities as further discussed in the sections below.

3.13 By bypassing the Key Service Settlements within the Green Belt, such as Writtle, the Plan perpetuates directing growth to the northern areas of the city. This includes land that is significantly less accessible and further from the city centre and its services and facilities. Continuing the linear development of Chelmsford northward will inevitably lead to increased car journeys, which contradicts the Plan’s sustainability objectives aimed at reducing the need to travel.

3.14 In preparation of the Draft LP the Council’s SA seeks to justify this its approach at para 5.5.84 that: “There is more than sufficient land being promoted for development outside of the Green Belt through the SHELAA ‘call for sites’ process to meet the identified development needs for the new Local Plan period and the preferred housing requirement (assessed housing need and a 20% buffer). For the reasons set out above, the Council strongly believes that, in accordance with paragraph 146 of the NPPF, currently there are other reasonable options for meeting its identified need for development, and no exceptional circumstances that mean that an option for development growth in the Green Belt is neither necessary, justified or reasonable at this time. Given the importance that national policy and guidance attaches to the protection and permanence of the Green Belt, there is no case for including locations for development which would undermine these longstanding principles.”

3.15 However, the Council’s approach is in stark contradiction to paragraph 147 of the 2023 NPPF which states that: “When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary...”

3.16 The Council also claim that they do not consider exceptional circumstances exist to warrant the review of Green Belt boundaries as part of their Local Plan Review. However, this is evidently not the case as outlined in paragraph 6.4.11 of the Integrated Impact Assessment. It highlights that Chelmsford City Council was approached by three local authorities in Essex unable to meet their housing need within their own Plan areas. During a period of housing crisis, as declared by Government and Chelmsford City Council, the Council should have recognised this as a clear indication of exceptional circumstances, warranting the consideration of Green Belt releases. In line with the duty to cooperate and the principles of effective cooperation with neighbouring authorities, it becomes evident that such circumstances exist in Chelmsford and Essex.

3.17 Chelmsford City Council’s decision to overlook this approach suggests that the Plan is not consistent with national planning policy and unsound. Further evidence of the Council’s reluctance to review the Green Belt is presented in paragraph 6.4.42 of the Integrated Impact Assessment. When considering site opportunities and selection, the methodology immediately discounted sites within Green Belt designation, failing to consider the sustainability of these locations. This oversight persists despite the settlement hierarchy clearly indicating that that sustainable settlements exist within the Green Belt areas of the Plan.

3.18 As discussed above, the plan has not therefore followed national policy, by not properly considering the sustainability credentials of all reasonable alternative locations in the Green Belt to ensure that the plan is the most appropriate strategy in line with paragraph 146 of the NPPF 2023.

3.19 Green Belt land is not a designation based on landscape or environmental merit. It is simply a land use policy used to prevent urban sprawl and for keeping land permanently open and, therefore, Green Belt designations should have little bearing on the sustainability credentials of a site.

3.20 The failure to consider Reasonable Alternatives through the premature exclusion of Green Belt land from the spatial strategy process artificially inflates the importance of Green Belt over the need to deliver sustainable development. This has led to the avoidance of the Green Belt in its entirety.

Attachment/s

[250317 Writtle Regulation 19 Representations.pdf \(3\)](#)

ID	PSIIA-22
Person ID	1380310
Full Name	Ms Katherine Jennings
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Site 16A
Question 2 - Please type your comment below:	<p>With respect to the allocation of land at East of Chelmsford - Hammonds Farm (Site 16a) I strongly object to this strategic allocation. The concentration of the majority of the housing allocated in this area has not been fully or fairly examined against other more spatial options adding to the Chelmsford City boundary within the Green Belt and to existing towns and villages including those within the Green Belt. It creates a dispersed settlement that is not cohesive with the existing city settlement or surrounding settlements</p> <p>This site was considered under the previous local plan process leading to the adoption of the 2020 Local Plan. This site was at that time discounted in favour of alternative sites to the north and west of Chelmsford which the Council considered exhibited better performance in respect of landscape, historic environment, flood risk, traffic generation and local road congestion. It is considered that the Council have not provided any justification to make a departure from the above consideration in the previous IAA. In particular the evidence in relation to traffic assessments is poor as significant investment is required to make this site sustainable given it is remote from the city centre and existing transport links. The evidence provided in relation to the capacity of the Boreham Interchange which will be subject to Hammonds Farm traffic accessing services and importantly the new rail station at Beaulieu has not been fully considered. This site does not provide sustainable links to the city centre being separated by a main trunk road.</p> <p>The landscape along the river valley and surrounding the village of Danbury and Little Baddow is exceptional. It was acknowledged previously that this area has a high value landscape but there has been no justification as to why this is no longer considered a constraint to development in this location. The SA remains quite quiet on the shift from this site being unsuitable in landscape terms to now being a preferred option. The loss of tranquillity within this river valley will be hugely detrimental and cannot be justified. Furthermore there is considerable loss of high valuable and productive agricultural land in this location which is contrary to planning policy.</p> <p>I consider that the Council have not fully examined all possible alternatives having set their mind to a large scale allocations north and east of Chelmsford. This allocation is unjustified, unlikely to be effective in delivery and it is not compliant with planning policy.</p>

ID	PSIIA-14
Person ID	1360095
Full Name	
Company / Organisation	Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Table 5.10
Question 1	No
Question 2 - Please type your comment below:	<p>We strongly object to the ratings given to Site Refs. 16a and 16b. We note that the scores for both sites have improved since the Regulation 18 Draft IIA, and this is despite there being only very minimal tweaks made to the wording of the proposed allocations in the Regulation 19 draft Local Plan. Specifically, we note that the Council's own evidence base on transport impact identifies key areas of concern in relation to the highways effects of the development of the two strategic sites, and thus it is not clear why the sites do not score 'significant negative impact' for this criterion.</p> <p>Very high impacts have also been identified in relation to the loss of an area of high landscape value, and impact on the significance of a range of designated heritage assets at Hammonds Farm. The mitigation proposed is minimal, and not sufficient to address the high impacts identified. Site 16a should also receive a 'significant negative impact' score for these two criteria.</p> <p>Site 16b lies within a Minerals Safeguarding Area, and thus it is unclear why its scores 'neutral' for the 'Waste and Natural Resources' criterion. Development of this site will also have significant adverse impacts in relation to harm to heritage assets, and should score 'red' for this criterion also.</p>
Question 3	<p>In our submitted main representations to the Regulation 19 Draft Local Plan, we have identified substantial and significant adverse impacts that will arise from the development of both sites 16a and 16b. The draft Local Plan does not explain how these impacts can be adequately mitigated.</p> <p>It is thus our view that the IIA has under-estimated the impacts associated with the development of these strategic sites, and we request that the assessment is revisited, particularly with regards to the criteria of 'transport', 'waste and natural resources', 'cultural heritage' and 'landscape and townscape'. No justification has been provided for why the rating of the sites has changed between the Regulation 18 and Regulation 19 draft IIA. The change to the scoring is illogical, given that only very minor tweaks have been made to the proposed wording of the allocations.</p>
Attachment/s	1360095IIA-A
ID	PSIIA-44
Person ID	1360095
Full Name	

Company / Organisation	Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	6.6.40
Question 2 - Please type your comment below:	<p>4.25 The Local Plan Pre-Submission Integrated Impact Assessment (IIA) considers an alternative option (Option 2c), whereby 3,000 new homes and 43,000 sq.m of employment floorspace could be located on identified development parcels within West and North West Chelmsford (on site refs. 21SHELAA41; CFS165; CFS182 (part); CFS82; CFS80; 21SHELAA100; 21SHELAA17; and CFS183).</p> <p>4.26 This alternative option would deliver the same benefits in terms of housing and employment land provision as Hammonds Farm, but in a location that is sited directly adjacent to the existing built-up area of Chelmsford. The IIA explains that Option 2c is rejected because – although adjacent to the Chelmsford Urban Area – the sites have poorer connectivity into the urban area, and are relatively isolated from the strategic highway network. It is also noted that there are less opportunities to create sustainable routes to existing public transport or provide new Bus Based Rapid Transport Infrastructure. It is noted that the area contains sites in multiple ownership and employment opportunities would be less accessible to the wider population.</p> <p>4.27 We disagree with this analysis. The plots have all been submitted as part of the Council’s Call for Sites exercise and are shown to be ‘green’ for availability in the Strategic Housing and Employment Land Availability Assessment (SHELAA), meaning that they are held by a developer / willing owner / public sector, and should therefore be considered to be available for development. The fact that the sites are in different ownerships should not in itself represent a constraint to development. Indeed, it is common for strategic developments to proceed on land which is owned by a consortium of parties.</p> <p>4.28 With regards to the site’s accessibility, the plots lie adjacent to the existing urban area, and existing, direct pedestrian / cycle connections are available to Chelmsford City Centre via Roxwell Road (the A1060). In addition, the sites benefit from close proximity to existing infrastructure in the western part of Chelmsford, including existing bus stops / routes (along Roxwell Road, Avon Road and Chignal Road); a Morrisons foodstore, library, community hall, and Chelmsford City Football Club stadium. Whilst further enhancements and infrastructure would necessarily be delivered as part of the strategic development proposals, it is clear that there is a foundation upon which to build, and the plots are well-located with regards to the existing facilities within Chelmsford.</p> <p>4.29 Moreover, the Pre-Submission Local Plan does propose to allocate one site in this area, directly adjacent to the plots identified above. Draft Strategic Growth site Policy 2 is proposed for a ‘sustainable neighbourhood’, that maximises opportunities for sustainable travel, and that will deliver 880 new homes, a Travelling Showpeople site for 5 serviced plots, a new neighbourhood centre, and a new primary school. The site will take main vehicular access from Roxwell Road, and will provide “safe and convenient pedestrian and cycle connections”, including new dedicated pedestrian and cycle links to the existing urban area, and well-connected internal road layouts to allow good accessibility for bus services. The policy justification text (paragraph 7.115) describes the site as offering: “an opportunity for a landscape- led sustainable urban extension that maximises opportunities for travel by sustainable modes”.</p> <p>4.30 As such, it is unclear why the other sites identified within the West and North West Chelmsford area, which lie directly adjacent to both the existing urban area and the planned development at Site Policy 2, have been ruled out as a potential suitable and sustainable location to accommodate future growth.</p> <p>4.31 Taking the above into account, it is unclear why the IIA should favour Hammonds Farm, which is entirely disconnected from the urban area; where the A12 is a physical barrier to movement; and where the delivery of convenient and efficient active and sustainable travel linkages will be challenging.</p> <p>4.32 Moreover, the IIA should also take into account the fact that the plots in West and North West Chelmsford are potentially less constrained than Hammonds Farm, and it is our view that growth in this direction would represent a less harmful strategy. We note that the main plots of land in West and North West Chelmsford score well in terms of their ‘suitability’ in the Council’s Strategic Housing and Employment Land Availability Assessment (SHELAA, Autumn 2024).</p> <p>4.33 As summarised in Table 4.1 below, whilst the Hammonds Farm site attains a total score of 84 in the SHELAA, the plots within West and North West Chelmsford all achieve much higher scores, and this is reflective of the fact that they are subject to far fewer constraints in terms of their suitability.</p> <p>4.34 It is therefore clear that the sites available within West and North West Chelmsford represent sustainable and accessible development options, which could together accommodate a strategic quantum of development (i.e. 3,000 new homes and 43,000 sq.m of employment floorspace). These plots are available for development (having been submitted to the Call for Sites process by willing owners / developers); benefit from less severe constraints than Hammonds Farm; and benefit from close proximity to the urban area and the City Centre, with some existing infrastructure already in place and potential to deliver further enhancements.</p> <p>4.35 The Council has not provided sufficient justification to explain why it has discounted this potential growth option.</p> <p>See Also Appendix 3 - Transport Technical Note and Transport Technical Note 2. See Attachment for full rep and appendices: 1360095PS-A</p>
Attachment/s	1360095PS-A.pdf

ID	PSIIA-15
Person ID	1158815
Company / Organisation	Maldon District Council
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Para 3.8.9
Question 2 - Please type your comment below:	It is noted the IIA refers to the need to upgrade the Water Treatment Works at South Woodham Ferrers. Although no final decisions have been made regarding our preferred strategy at this stage, please note that a large site within the MDC district on the boundary with South Woodham Ferrers has come forward in the Call for Sites and may form part of MDC's strategic site allocations, subject to further assessment work. See attachment for full rep: 1380129PS-A
Attachment/s	1380129PS-A.pdf
ID	PSIIA-16
Person ID	1158815
Company / Organisation	Maldon District Council
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Para 4.3.27
Question 2 - Please type your comment below:	It is also noted within the IIA there has been an identified impact on the road infrastructure around Maldon and in particular B1026 Goldhanger Road on the eastern side of Heybridge. The assessment states this is due to the potential increase in traffic volumes as a result of the Chelmsford City Local Plan. The assessment also comments that based on the Maldon District Local Development Plan significant increase in traffic on roads near the SAC are not anticipated. MDC are concerned about this impact, particularly as we are currently reviewing our own local plan. Whilst no decisions have been made on our growth options, some scenarios include the potential for growth in larger villages, for example Heybridge. See attachment for full rep: 1380129PS-A
Attachment/s	1380129PS-A.pdf
ID	PSIIA-17
Person ID	1158815
Company / Organisation	Maldon District Council
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Figures 3.7, 3.8, 3.9
Question 2 - Please type your comment below:	It should be noted the tables on pages 89-91 included within the IIA, are unreadable within the document. (NB: refers to Printed Pages 77 to 79). See attachment for full rep: 1380129PS-A
Attachment/s	1380129PS-A.pdf

ID	PSIIA-2
Person ID	1327864
Company / Organisation	Martin Grant Homes
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Section 6.4
Question 2 - Please type your comment below:	<p>Para 61 of the NPPF states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method.</p> <p>2.17. Para 61 further identifies the outcome of this is an advisory starting-point and there may be exceptional circumstances, such as a particular demographic characteristic of an area, which justify an alternative approach to assessing housing needs.</p> <p>2.18. The NPPF 2024 is clear that housing need should be calculated through the December 2024 version of the standard method, even where transitional arrangements apply.</p> <p>2.19. The Plan recognises the most recent standard method calculation of 1,454 dwellings per annum (referenced at para 6.6 of the Plan), however this should be more plainly emphasised, including a clear explanation for how this figure has been calculated.</p> <p>2.20. Whilst the standard method calculation and corresponding need figure has evolved over the course of preparation of the plan, the detail provided at para 6.2 – 6.6 regarding what are the housing needs lacks clarity and presents a confused picture based on out-of-date housing evidence and figures.</p> <p>2.21. We consider it necessary, to ensure the housing need figure is clearly justified and consistent with national policy, that the Strategic Housing Needs Assessment (SHNA) be updated to reflect the up-to-date standard method.</p> <p>2.22. This should reflect that, regardless of the housing supply position, housing needs exist at the level indicated by the standard method. The 2024 SHNA Addendum fails to achieve this, instead considering a reduced housing need figure of 1,206 dwellings per annum against the, at that time, proposed standard method figure of 1,406 dwellings per annum.</p> <p>2.23. The standard method figure represents minimum housing needs. The Council's evidence base should reflect this in full, and only after doing so consider the implications of not meeting this (if that is the case).</p> <p>2.24. Whilst out-of-date, the Council's SHNA considers whether there would be exceptional circumstances which justify an increase or decrease to the housing need figure. In summary, this found that demographic trends and economic growth did not justify any divergence from the standard method calculation. This position should be re-confirmed in light of the latest housing need figure.</p> <p>2.25. We consider the position that there are not exceptional circumstances which justify an increase or decrease to the housing need figure is likely correct, but the evidence should be updated to ensure this is fully justified.</p> <p>2.26 The Council should therefore, as far as possible, be looking to achieve its minimum housing needs. Not to do so would create additional unmet housing needs in a region where this is already significant and growing.</p> <p>Housing Requirement</p> <p>2.27. As set out in Para 11 b) of the NPPF, strategic policies should, seek to meet identified needs (including unmet needs) unless:</p> <ol style="list-style-type: none"> i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. <p>2.28. After considering a "policy off" minimum housing need figure, setting the housing requirement is effectively the second stage in process. In accordance with Para 11 b) this should look to address minimum housing needs.</p> <p>2.29. The NPPF makes clear that, in addition to the housing need figure, the housing requirement may also need to take into account needs that cannot be met within neighbouring areas (para 61). Further, the housing requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas or reflects growth ambitions linked to economic development or infrastructure investment (para 67).</p> <p>2.30. Para 6.4.11 of the Integrated Impact Assessment (IIA) states:</p>

In response to the consultation on the Preferred Options, the Council received approaches from Castle Point Borough Council and Southend on Sea City Council, and following the consultation, an approach from Basildon Borough Council, requesting that Chelmsford help to meet unmet housing need through its Local Plan allocations.

2.31. No specific detail is provided as to what the level of need Chelmsford has been requested to accommodate, or any assessment as to the total level of unmet needs across the region. This should be established.

On this basis, there is a scenario for the Plan seeking to deliver a housing requirement above minimum housing needs figure, subject to the provisions of Para 11 b).

2.33. This growth scenario is not considered in the IIA, not being considered a reasonable alternative on the basis there is “no capacity in Chelmsford’s proposed Spatial Strategy to accommodate any unmet housing need from neighbouring or nearby local authorities”.

2.34. The IIA considers a scenario of 1,406 dwellings per annum (which is below minimum housing needs under the December 2024 standard method) but assesses this on the basis of a particular selection of strategic-scale sites only. The scenario is discounted on the basis of these sites, rather than the quantum of growth.

2.35. There is likely a different make-up of sites forming a ‘high growth’ scenario which could result in a suitable spatial strategy which accommodates minimum housing needs and (if feasible) unmet needs. Against some of the strategic priorities, i.e. housing, investment, health and wellbeing, etc.. this could lead to gains above the Council’s preferred option.

2.36. The discounting of a ‘high growth’ scenario based on consideration of one selection of sites only is not justified.

2.37. Other suitable sites of a range of sizes have been identified through the Council’s evidence base which could, together, be a reasonable alternative spatial strategy to be tested as part of a ‘high growth’ scenario.

2.38. Additionally, the conclusion of the IIA which state the high growth scenario would “perform more poorly overall” due to “uncertainty overall such as potential oversupply of housing in the plan period disrupting co-ordinated delivery against identified need”, are wholly unjustified. There is no evidence that achievement of the minimum housing need figure would have any “disruption” effect.

2.39. Whilst the Plan benefits from the transitional arrangements of the NPPF 2024, this does not override the need for the Plan to be sound including “providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs”.

As it stands, the Council has not justified its position as to why the higher growth scenario cannot be accommodated. The Council should be looking to achieve this where possible, and to discount this on the basis it could “disrupt” delivery is wholly flawed.

2.41. Further, it has not considered a potential reasonable alternative of addressing housing needs in full, plus an element of unmet needs from neighbouring authorities. Without assessment there is no clarity as to how this would perform against the strategic priorities.

2.42. There are further sites which can, and should, be considered suitable as part of these scenarios. This includes Land at Little Fields, Danbury, which is highlighted as suitable in the Council’s evidence base as discussed in Section 4.

2.43. The Council’s proposed housing requirement of 1,210 homes per annum is not justified, is not positively prepared, and would not be effective in addressing housing needs across the District.

2.44. The identified housing requirement would fail to “significantly boost the supply of housing” contrary to the objective set by the Council at Reg 18 stage where it recognised an over-supply (circa. 20% at that stage) would be necessary if issues such as inequality and lack of affordable housing were to be addressed.

2.45. In light of the uplift in standard method since Reg 18 stage, it may no longer be appropriate to include a 20% supply buffer (albeit this should be tested as a reasonable alternative in the IIA), but to move from a housing needs +20% position to housing needs -18% position is a significant change in direction, contradicts the Council’s Plan Vision, relevant strategic objectives and its declared housing emergency and does not have its foundations in evidence.

For full representation see attachment 1327864PS-A - Martin Grant Homes.

Attachment/s

[1327864PS-A - Martin Grant Homes.pdf](#)

ID	PSIIA-8
Person ID	1358507
Full Name	
Company / Organisation	National Trust
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Appendix F Appraisal of development requirements & the proposed spatial strategy
Question 1	No
Question 2 - Please type your comment below:	<p>The National Trust was founded in 1895 as an independent charity to hold and manage, in perpetuity for the benefit of the nation, countryside and historic buildings in England, Wales and Northern Ireland. The Trust fulfils its statutory responsibilities as laid down in the National Trust Acts, through ownership and direct management of the properties in its care. It is within the remit of the National Trust to comment where development proposals may affect our land or property, or other special places.</p> <p>The National Trust supports a plan led approach to new development. We acknowledge the Spatial Strategy set out in the Pre-Submission Local Plan in order to meet an identified housing need. It is noted that East Chelmsford Garden Community (Hammonds Farm) is identified as a Strategic Growth Site for around 3,000 homes within the plan period and with capacity for a further 1,500 homes beyond 2041, along with infrastructure including an on-site new country park and significant new multi-functional green infrastructure. Strategic Growth Policy Site 13 Danbury is identified for 100 homes within the plan period.</p> <p>Blake's Wood and Lingwood Common (located to the north of Danbury) together with Danbury Common (located to the south of Danbury) are designated as Sites of Special Scientific Interest and are owned and managed by the National Trust. The sites are woodland areas with some visitor infrastructure. Taken as a whole the mosaic of habitats across Danbury Ridge including the National Trust sites, Essex Wildlife Trust Nature Reserves, and other land including ancient woodland and woodlands in private ownership not accessible to the public, is an important landscape for wildlife which is more than the sum of its parts.</p> <p>We are concerned, that the new country park is proposed on the western part of Hammonds Farm, by the corresponding the proximity of the new residential areas to Danbury Ridge, and the eastern green links which will be made through to the wider landscape which could indirectly impact the SSSIs through cumulative recreational pressure without appropriate mitigation measures. New residential development in Danbury village would be in proximity to the Danbury SSSIs.</p> <p>Whilst Natural England assessed Danbury Common in 2018 as being at low risk of pressure from recreational disturbance, habitat impacts are apparent on site. There has been considerable growth in and around Chelmsford in the intervening years, the pandemic has changed how people interact with the outdoors, and further growth is due to take place across the plan period.</p> <p>The Integrated Impact Assessment (IIA007) high-level assessment of the plan states under the Biodiversity and geodiversity heading, consideration for several matters including Housing delivery, Spatial Strategy, and Policy S6 Housing and Employment Requirements there are unlikely to be direct effects on [designated sites] but that there could be indirect effects including from increased recreational activity. The scoring indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed in the colour used. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.</p> <p>The Trust welcomes the new Site masterplanning principle for Hammonds Farm to provide necessary mitigation to address the cumulative recreational pressure on SSSIs in proximity to the site, and for the Danbury sites to contribute towards addressing cumulative recreational pressure on the SSSIs. However, the Trust considers currently there is insufficient evidence to demonstrate the Plan would not have an adverse and unacceptable impact on SSSIs contrary to Paragraphs 187, 188 and 192 of the National Planning Policy Framework as set out below.</p> <p>Para. 187 states that planning policies should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).</p> <p>Para. 188 states that plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.</p>

	<p>Para. 192 states that in order to protect and enhance biodiversity and geodiversity, plans should: (a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and</p> <p>(b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.</p>
Question 3	<p>We consider impacts on the SSSIs and Ancient Woodlands should be assessed at the Local Plan stage and scale, rather than for individual planning applications, so that cumulative impacts for the plan period can be adequately assessed and appropriate mitigation can be ensured.</p>
Question 4 - Executive Summary	<p>Taken as a whole the mosaic of habitats across Danbury Ridge is an important landscape for wildlife which is more than the sum of its parts.</p> <p>We are concerned that the Hammonds Farm development, and residential development around Danbury could indirectly impact the SSSIs through cumulative recreational pressure without appropriate mitigation measures.</p> <p>We consider impacts on SSSIs and Ancient Woodlands should be assessed at the Local Plan stage and scale, rather than for individual planning applications, so that cumulative impacts for the plan period can be adequately assessed and appropriate mitigation can be ensured.</p> <p>We would welcome discussion with the Council around recognising the Danbury Ridge area holistically, in order to ensure the new Local Plan can effectively preserve and enhance this landscape, whilst accommodating necessary growth and improving access to nature for its communities.</p>

ID	PSIIA-49
Person ID	1249937
Full Name	
Company / Organisation	Natural England
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	General
Question 2 - Please type your comment below:	<p>We have not been able to review the document in detail. However, we have the following general comments:</p> <p>We agree with the Biodiversity and Green Infrastructure key sustainability issues although note that biodiversity net gain is mandatory for all developments (with certain exceptions) and will be mandatory for Nationally Significant Infrastructure Projects in November 2025 Biodiversity net gain - GOV.UK (www.gov.uk). We agree with the Land Use, Geology and Soils key sustainability issues although note that previously developed land may have biodiversity (invertebrate) interest which needs to be taken into account by development. We agree with the Landscape and Townscape key sustainability issues.</p> <p>We support the criteria to test the plan's policies and proposals for negative impacts on European sites, SSSIs local sites, ancient woodland etc.</p> <p>We are happy with the criterion to conserve and enhance the Marine Conservation Zone under Objective 14. Landscape and Townscape. However, we suggest that the following wording is added to Objective 1. Biodiversity and Geodiversity: Will it preserve and enhance the local marine environment through the Blackwater, Crouch, Roach and Colne Estuary Marine Conservation Zone (MCZ)?'</p> <p>We note the conclusion that there are mixed positive and negative effects in respect of biodiversity and land use (section 8.2.8) and we agree that 'There will be pressures on biodiversity, land use, resource use and climate change, challenging policy and site-specific proposals to employ best practice sustainable measures' (section 8.2.9). We support the conclusion that 'The uncertainties and negative effects recorded emphasise the importance of the monitoring of the performance of sustainability indicators to help implement mitigation measures which would help improve the performance of all approaches, notably in respect of air quality, biodiversity, climate change and health and well-being' (section 8.2.11). We support the proposed IIA monitoring indicators for objectives 1, 7 and 14.</p> <p>See Attachment for full rep: 1249937PS-A</p>
Attachment/s	1249937PS-A.pdf
ID	PSIIA-50
Person ID	1249937
Full Name	
Company / Organisation	Natural England
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Habitats Regulations Assessment
Question 2 - Please type your comment below:	<p>We have the following comments to make on the Chelmsford City Council Local Plan 2022 – 2041 Habitats Regulations Assessment (WSP, December 2024):</p> <p>We disagree with the statement in para 4.2.15 that none of the Pre-Submission allocations will have significant effects alone with the exception of Land North of South Woodham Ferrers and allocations that may affect functionally linked land (FLL). We consider that major developments within the recreational disturbance ZOI established by Essex Coast</p>

RAMS, particularly the Garden Communities and those with over 100 dwellings, will have a likely significant effect taken alone. However, we consider that standard measures as detailed in our Suitable Alternative Natural Greenspace (SANG) Guidelines can provide suitable mitigation to address 'alone' impacts.

We agree that the allocation at South Woodham Ferrers requires consideration under the Habitats Regulations due to its large size and proximity to a European site. However, all site allocations within the recreational disturbance ZOI established by the Essex Coast RAMS require consideration under the Habitats Regulations.

With regard to FLL, we agree with the international sites that have been screened in (Table 4-10). We agree that windfall developments that may be located on FLL can be determined at a project-level (section 5.5.7). However, note that any windfall development with suitable habitat that has the potential to affect FLL due to its proximity to coastal sites, should provide sufficient evidence to determine whether the application site constitutes FLL or not.

We agree with the screening summary (section 4.4). With regard to 'Recreational Pressure/Urbanisation' (sections 5.2, 6.2, 7.2), we consider that more weight should be given in the HRA under 'Incorporated Mitigation' to bespoke scheme-level measures (e.g. the provision of sufficient accessible on-site green infrastructure and circular walks) that may be required by CCC for some developments, in addition to payments under the RAMS (paras 5.2.12, 6.2.7, 7.2.9).

Subject to the provision of sufficient high quality accessible natural greenspace to mitigate alone impacts of larger developments, we agree with the conclusion that the Pre-Submission Local Plan will have no adverse effects on the integrity of the Essex Coast Habitats Sites due to recreational pressure or urbanisation effects, alone or in combination. Depending on the size of the proposal and its distance from the coast, adherence with all of the criteria in the NE SANG Guidelines 2021 may be required to fully mitigate alone impacts. In such cases, payment of the RAMS tariff is to mitigate for residual impacts, as the provision of greenspace will never fully prevent visits to the coast, nor is that the aim of such greenspace.

We agree with the policies requiring provision of wastewater treatment capacity that require sufficient wastewater treatment to be available and effective for new development in advance of occupation. We note the particular reference to Great Leighs in this respect.

As noted in the HRA, the impacts of the CCC Local Plan will not be substantive enough to prevent the achievement or maintenance of favourable conservation status at Epping Forest SAC, if the mitigation plans outlined in Local Plans adjacent to the SAC are delivered as proposed. Consequently, based on the available data including recent air quality modelling from other LPAs, it is considered that the Pre-Submission draft Local Plan will have no adverse effects on the integrity of Epping Forest SAC, alone or in combination.

See Attachment for full rep: 1249937PS-A

Attachment/s

[1249937PS-A.pdf](#)

ID	PSIIA-35
Person ID	1326424
Full Name	
Company / Organisation	Obsidian Strategic Asset Management Ltd
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Appendix K
Question 2 - Please type your comment below:	<p>3.5.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies that are set out in local plans must be the subject of a Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against all reasonable alternatives.</p> <p>3.5.2 The Local Plan should ensure that the results of the SA process clearly justify any policy choices that are ultimately made, including the proposed spatial strategy and site allocations (or any decision not to allocate sites) when considered against 'all reasonable alternatives'. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Council's decision making, and scoring should be robust, justified, and transparent.</p> <p>3.5.3 The Preferred Options Local Plan is accompanied by an Integrated Impact Assessment (IIA). This encompasses the sustainability appraisal, strategic environmental assessment, habitats regulations assessment, health impact and equality assessment of the review of the adopted Local Plan.</p> <p>3.5.4 The Proposed Spatial Strategy draws on aspects of the five spatial options set out in the Issues and Options Consultation Document, which comprised: Approach A: Growing Existing Strategy; Approach B: Growth in Urban Areas; Approach C: Wider Strategy; Approach D: Growth Along Transport Corridors; Approach E: New Settlement.</p> <p>3.5.5 Although the proposed Spatial Strategy is a hybrid of Spatial Approaches A to E, it most resembles Spatial Approaches A and B by focusing development in and close to the Urban Areas and Key Service Settlements outside of the Green Belt, whilst providing for continued housing and employment land provision through the proposed allocation of a new garden community, and sites in the Chelmsford Urban Area.</p> <p>3.5.6 Approaches A and C include new allocations at larger villages, including Broomfield. We continue to disagree with the reasoning presented to support the rejection of Broomfield as a location for growth on the basis of employment and transport considerations.</p> <p>3.5.7 Appendix K provides an appraisal of the alternative spatial approaches. Under Assessment Objective 3 (Economy, Skills and Employment), Approach C is given an assessment score of Minor Positive. This is a lower grading than the other approaches. The reason given is: "Under this approach residential development would be more dispersed throughout the City Area and including at settlements without major employers and which are less accessible to the City Centre. In consequence, prospective residents in these settlements would be likely to have poorer accessibility to employment opportunities, notwithstanding the presence of some major employers in some locations, such as Broomfield."</p> <p>3.5.8 The IIA does not provide a clear explanation as to why further growth in Broomfield should receive a lower score, considering that it is a Key Service Settlement which features the Council's single largest employer, Broomfield Hospital.</p> <p>3.5.9 Similarly, under Assessment Objective 6 (Transport), Approaches A and C are both assessed as Minor Positive / Minor Negative. The negative being that directing a proportion of the City Area's housing requirement to the smaller settlements could result in increased car use given the existing size of the settlements and the more limited range of services and jobs they provide.</p> <p>3.5.10 Again, this is considered to be a generalisation. Broomfield has the major services that would be expected of a regional centre, for example Broomfield Hospital as well as one of Chelmsford's largest secondary schools. It is very well located for accessibility to Chelmsford, being described in the adopted Local Plan as a 'quality' bus corridor with a very good frequency of services connecting into Chelmsford City Centre. Indeed, the IIA recognises under Approach A that: "new development does present an opportunity to enhance the sustainability of these settlements by supporting investment in community facilities and services, developing their existing strengths which in some cases include key employers and good public transport infrastructure".</p> <p>3.5.11 Opportunities for further development in Broomfield should not be discounted on the grounds that it performs poorly in employment and transport terms. As a result, we can conclude that the plan is not "justified" (NPPF, paragraph 36).</p>
Attachment/s	1326424PS-A.pdf

ID	PSIIA-54
Person ID	1360249
Full Name	Miss Hanneke Redeker
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Table 5.10 and Appendix G
Question 2 - Please type your comment below:	<p>I feel the plan is unsound and object for the following reasons.</p> <ol style="list-style-type: none"> 1.The proposed access to the site (Barbrook Way) is not suitable for the type of construction vehicles that would be used. The road itself is in a state of disrepair with steel reinforcement rods exposed and the road itself is crumbling in many areas. The road itself is used by local children as a play area and this type of traffic would present a very dangerous situation. 2.The traffic through the village is at an all time high with gridlock at times around the old Paul Bailey roundabout area. There has already been a serious accident in recent weeks with accidents in the vicinity of the former Paul Bailey site a daily occurrence. The roads around Bicknacre are dangerous at times with speeding drivers using the village as a rat run. 3. The councils own Intergrated Impact Assessment report carried out by WSP casts serious doubts on the proposed sites. 4.My local MP John Whittingdale is strongly opposed to the development as is the Parish Council. 5.The local doctors surgery (Wyncroft Surgery)is at full capacity and appointments are hard to come by and often require travel to South Woodham Ferrers.

1380176, Mr, Alan, Roche

ID	PSIIA-29
Person ID	1380176
Full Name	Mr Alan Roche
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	General comment
Question 2 - Please type your comment below:	See attached comments
Attachment/s	Objection to the Chelmsford Local Plan 16a.docx (1)
ID	PSIIA-30
Person ID	1380176
Full Name	Mr Alan Roche
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	General comment
Question 2 - Please type your comment below:	See attached comments.
Attachment/s	Objection to the Chelmsford Local Plan 16b final.docx

1157118, Rochford District Council

ID	PSIIA-47
Person ID	1157118
Company / Organisation	Rochford District Council
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	General comment
Question 2 - Please type your comment below:	RDC acknowledges the publication of the accompanying Pre-Submission Integrated Impact Assessment (2025). RDC has no specific comments to make regarding the legal compliance of these documents or their conclusions.

ID	PSIIA-42
Person ID	1329238
Full Name	
Company / Organisation	Saxtons 4x4
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	1.4.9
Question 2 - Please type your comment below:	<p>The pre-submission Integrated Impact Assessment (IIA) was last updated May 2024. Para 1.4.9 of the 2024 IIA confirms that “Development sites will be allocated to accommodate a minimum of 162,646 sqm of new employment business floorspace (Use Classes E(g)(i-iii), B2 and-B8) in addition to existing commitments over the Plan period”. It also confirms the spatial use of the area in a key diagram of its proposed spatial strategy, which is also Figure 14 of the 2025 Pre-Submission Plan (see below).</p> <p>The IIA confirms that despite the settlement hierarchy of the plan of the 162,000 sqm needed for employment space only 9,000sqm of employment floorspace is to be provided in 2 locations at Maldon Way(4k) and 5k at previously developed sites in the urban Chelmsford urban area. We believe that additional suitable and available sites could increase this supply, better aligning with the spatial strategy.</p> <p>The IIA cites various evidence base documents including councils own economic strategy, and Employment Land Review and Annual Monitoring Reports, that will need to ensure that future growth of Chelmsford's economy will be dependent upon “the provision of high quality development opportunities, including high quality office space and industrial unit space, in order to attract new investors”. Indeed 2 of the key sustainable objectives of the IIA are also cited as</p> <ol style="list-style-type: none"> The need to deliver a range of employment sites to support economic growth. The need to ensure a flexible supply of land for employment development. <p>In regard to traffic flows and in/out commuting, the evidence base also states that there is “a significant outflow of commuters from the Chelmsford City Area alongside a significant inflow. In 2011, a total of 30,605 workers commuted into Chelmsford from other local authorities whilst 34,430 residents commuted out of Chelmsford. This represents a net outflow of 3,825 workers.” With sustainable transport movements being a priority for the council we believe that all opportunities to retain and provide employment within the locale of the existing employment centres should be maximised.</p> <p>We would also note that the IIA does not seem to SA test alternative options to the employment allocations, or a “extend existing employment areas” options for assessment and we would seek confirmation that this has been undertaken. We therefore consider the plan to not be consistent with national policy and not positively prepared.</p> <p>To summarise regarding employment, the Local Plan in principle fails to demonstrate a fully justified approach in regard to employment policies supporting the need for employment space and protecting existing spaces. We are concerned that the Local Plan does not go far enough and therefore has not been positively prepared in clearly setting out a strategic strategy for the pattern, scale and design quality of spaces to make sufficient provision for employment, in line with the NPPF para. 20.</p> <p>See Attachment for full rep: 1329328PS-A</p>
Attachment/s	1329238PS-A.pdf

ID	PSIIA-12
Person ID	1380325
Full Name	
Company / Organisation	Sempra Homes
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Table 5.8
Question 1	No
Question 2 - Please type your comment below:	It is important to highlight an apparent error in the Pre-Submission Integrated Impact Assessment whereby the results in the summary Table 5.8 do not align with the results set out in the full assessment provided in Appendix G
Question 3	Subject to confirmation from the Council on which table provides the correct assessment of this site, our client considers the apparent assumption (through the negative air and water quality scores) that building more homes automatically results in an increase in population, to be unsound. There are no known air or water quality issues for this site for example, and as such the score appears to relate to the perceived increase of water usage and/or traffic movements. This would not necessarily be the case here, given that it is anticipated that the majority of the future residents of the Site, post-development, are residents already living in Chelmsford. Please see supporting document.
Attachment/s	Final Rep 17 03 2025 Policy 1z Granary Car Park.pdf

ID	PSIIA-20
Person ID	1329445
Company / Organisation	A.G. & P.W.H Speakman
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Para 6.4.14
Question 2 - Please type your comment below:	<p>Settlement Hierarchy</p> <p>The use of a settlement hierarchy to help inform the distribution of development within the administrative area is considered a logical approach, and a conventional one that has been successfully utilised in the preparation of a number of sound Local Plans prepared elsewhere in recent years. It can be a useful tool to ensure a sustainable distribution of development, although it is important that the application of the hierarchy to policies and allocation is not an overly simplistic one, and wider sustainability considerations are accounted for.</p> <p>We are supportive of the identification of Danbury as a Key Service Settlement.</p> <p>Key Service Settlements such as Danbury are highly sustainable locations for new housing across the Plan period, with such settlements recognised for their accessibility to a range of services and facilities as well as key infrastructure. This is acknowledged both in the adopted Local Plan (2020) and at paragraph 6.27 of the DPD.</p> <p>Whilst we agree that the use of a settlement hierarchy to help inform decisions regarding the scale of growth to be directed to the various settlements within the borough, as the policy text is currently worded, it is unclear how the settlement hierarchy as set out in Strategic Policy S7 is to be used by decision-makers.</p> <p>If the settlement hierarchy is simply providing the explanation for the distribution of growth subsequently proposed in the subsequent section of Strategic Policy S7, then it may be necessary for it to be removed from the policy and placed within the reasoned justification. In this respect, we wish to highlight how a near identical issue was recently considered through the examination West Suffolk Local Plan. In the case of this Local Plan, the settlement hierarchy and dwelling distribution by settlement was included as part of a policy in the submitted version. However, one of the Inspectors' actions for West Suffolk Council arising from the examination hearing sessions was for this table to be removed from policy text and placed in the reasoned justification instead.</p> <p>Whilst the above represent a potential way of addressing the settlement hierarchy if it is not intended for any function other than to provide justification for subsequent policies / allocations, it does not help address concerns in respect that the Local Plan may not deliver sufficient homes to address the communities' needs.</p> <p>In this respect, we consider there is an alternative remedy that better reflects national policy and would enable the Local Plan to be considered positively prepared: the settlement hierarchy could remain within Strategic Policy S7, but crucially it would need to be accompanied by text explaining that it should be used by decision-makers to direct additional growth beyond that to be delivered on sites the Local Plan allocates. It could, for example, make clear that potential residential development sites beyond the settlement boundaries would still be considered positively, having regard to the settlement hierarchy and other Local Plan, as well as national, policies. Such an approach would provide opportunity to help mitigate the fact the submitted Local Plan seeks to provide far fewer homes than the current Standard Method should use as a minimum requirement in order to address the current housing crisis; helping to address the concerns identified in respect of Strategic Policy S7.</p> <p>One does not have to look far for a potential example of how such a policy could be set out. In neighbouring authorities' North Essex Authorities' Shared Strategic Section 1 Plan, Policy SP 3 includes the following:</p> <p>"Existing settlements will be the principal focus for additional growth across the North Essex Authorities area within the Local Plan period. Development will be accommodated within or adjoining settlements according to their scale, sustainability and existing role both within each individual district and, where relevant, across the wider strategic area.</p> <p>"Future growth will be planned to ensure existing settlements maintain their distinctive character and role, to avoid coalescence between them and to conserve their setting. Re-use of previously developed land within settlements is an important objective, although this will be assessed within the broader context of sustainable development principles, particularly to ensure that development locations are accessible by a choice of means of travel."</p> <p>The above was found sound in relation to the NPPF 2012.</p> <p>One way to reword the current Policy S7 having regard to all of the above, would be as follows: Development will be brought forward in accordance with the Spatial Strategy Development Locations and Allocation, as well as through development within and adjoining existing settlements having regard to the settlement hierarchy below, as well as other policies within this Plan and the NPPF, read as a whole.</p>

The above modifications would need to be made in conjunction with changes to other policies and text within the emerging Local Plan, including that which classifies any land beyond the Defined Settlement Boundaries as Rural Area, and adopts a negative stance to residential development of such.

The alternative to the above would be to simply move the settlement hierarchy table to the reasoned justification text but seek to increase the number of new homes the Local Plan will deliver through alternative means, e.g. by increasing the number of sites allocated for development.

Proposed Spatial Options, Proposed Allocations and Reasonable Alternatives

The proposed spatial strategy will focus new housing and employment growth to the most sustainable locations by making the best use of previously developed land in Chelmsford Urban Area; new garden communities to the northeast and east of Chelmsford; sustainable urban extensions around Chelmsford; expansion of existing employment sites; and development around Key Service and Service Settlements outside the Green Belt in accordance with the Settlement Hierarchy. Whilst the IIA confirms the strategy has been informed by all of the five proposed spatial options published at the Issues and Options stage, the spatial strategy is predominantly a continuation of the adopted Local Plan spatial strategy.

Development will be focused in three broad areas: Growth Area 1 – Central and Urban Chelmsford; Growth Area 2 – North Chelmsford; and Growth Area 3 - South and East Chelmsford. Proportionate housing growth towards Key Service Settlements (such as Danbury) continues form a core part of the proposed spatial strategy within one of the three Growth Areas, relying on existing allocations, extant permissions, windfall allowance and new proposed allocations to address residual housing need.

New housing allocations are proposed in Danbury within Growth Area 3 under proposed allocation Strategic Growth Site Policy 13, for 100 homes. The proposed policy wording acknowledges that the sites to accommodate this allocation are allocated through the 'made' Danbury Neighbourhood Plan and are simply carried forward into the DLP. This follows on from adopted Local Plan policy Strategic Growth Site Policy 13 – Danbury which dictates that an allocation of around 100 homes will be accommodated within or adjoining the settlement boundary of Danbury, to be identified and consulted upon through the emerging Danbury Neighbourhood Plan. The allocations and overall quantum of housing growth sought within the Made Neighbourhood Plan are reflective of this Local Plan policy.

The allocations carried forward are: • Sandpit Field, East of Little Fields: 10 dwellings • Land at Tynedales Farm West: 65 dwellings • Ex Play Area, Jubilee Rise: 2 dwellings • Danecroft, Woodhill Road: 14 dwellings • Land at Cpt Hill/Mayes Lane: 2 dwellings

Irrespective of whether Land at Anchor Field is more suitable than these sites, they are allocations in a Made Neighbourhood Plan and it is entirely reasonable for the Local Plan to allocate these sites on this basis.

Danbury's current housing growth allocation of 100 homes is based on the now-superseded housing requirement set out in the adopted Chelmsford Local Plan, which covered the period 2013 to 2036. That requirement was for 18,515 net new homes. However, Chelmsford's emerging Local Plan reflects a significantly higher housing requirement of 1,206 dwellings per annum (dpa) through to 2041. This marks a substantial uplift in housing need over an extended plan period, which necessitates a reassessment of the level of housing growth apportioned to sustainable settlements such as Danbury.

Danbury is identified as a Key Service Settlement under the Chelmsford Settlement Hierarchy. Such settlements are expected to accommodate proportionate housing growth to support their ongoing sustainability and contribution to the wider spatial strategy. The Integrated Impact Assessment (IIA), however, has only tested the delivery of 100 homes in Danbury — a figure that directly reflects the allocations made through the Danbury Neighbourhood Plan. This fails to account for the increased housing requirement and the extended plan period to 2041. Given Danbury's status as a highly sustainable settlement with a range of local services and strong infrastructure connections, it is entirely possible that 100 homes worth of growth over the new plan period is insufficient. Apportioning only 100 homes would constrain Danbury's potential to grow sustainably and limit its ability to contribute meaningfully to meeting Chelmsford's higher residual housing need. The plan must therefore reconsider Danbury's housing growth target to ensure it reflects the increased strategic requirement and Danbury's capacity to accommodate additional development sustainably.

The IIA has only assessed Danbury's capacity to accommodate 100 homes, consistent with the Neighbourhood Plan allocation. It has not tested whether Danbury could and should accommodate a greater level of growth in line with the increased housing requirement and extended plan period. This represents a critical gap in the evidence base. The plan must robustly assess whether additional allocations in Danbury would be justified and sustainable, particularly given its established status as a Key Service Settlement and the national policy drive to increase housing supply.

To ensure the Local Plan's soundness, the Council must re-evaluate Danbury's growth potential in the context of the increased housing requirement and extended plan period. It should test higher growth scenarios for Danbury in the IIA to determine whether additional allocations are justified and sustainable. The plan must also ensure that Danbury's housing growth aligns with its status as a Key Service Settlement and its capacity to deliver sustainable development. Restricting Danbury's growth to 100 homes over a significantly longer plan period and higher housing target risks underutilising a highly sustainable settlement. To secure a sound and resilient Local Plan, Chelmsford should allocate additional housing to Danbury to reflect its strategic role and the wider housing need pressures.

To make the plan sound, the Council must reconsider its approach to Danbury's housing growth within the spatial strategy. The proposed growth target should be increased to reflect the higher strategic housing requirement and Danbury's sustainable status as a Key Service Settlement. This will ensure that Danbury's growth is not artificially constrained and that it makes an appropriate contribution to Chelmsford's housing supply over the extended plan period. The IIA must also be updated to test higher growth scenarios for Danbury, ensuring that all reasonable alternatives are fully assessed. Without this, the Local Plan risks being found unsound at examination and requiring significant modification.

By increasing Danbury's housing growth through allocating more sites such as Land at Anchor Field and properly testing higher growth scenarios in the IIA, the Council can ensure that the Local Plan remains consistent with national policy objectives, supports sustainable development, and delivers a robust and adaptable housing strategy through to 2041.

The Integrated Impact Assessment (IIA) acknowledges that Chelmsford City Council has received formal requests from Castle Point Borough Council, Southend-on-Sea City Council, and Basildon Borough Council to help meet their unmet housing needs through Chelmsford's Local Plan allocations (paragraph 6.4.11). This reflects the significant development constraints faced by neighbouring authorities, which limit their ability to meet their own housing requirements in full. The National Planning Policy Framework (NPPF) places a clear obligation on local planning authorities to engage constructively and seek to address unmet housing needs under the Duty to Cooperate.

Despite these formal requests, the IIA states that Chelmsford's proposed Spatial Strategy has no capacity to accommodate unmet housing needs from neighbouring authorities (paragraph 6.4.14). However, this conclusion reflects the limitations of the spatial options and strategy tested by the IIA, which have been narrowly defined to supply only the residual housing requirement left over from existing Local Plan allocations, permissions, and windfall allowances. The spatial strategy has been constructed to meet Chelmsford's own housing requirement under the NPPF's transitional arrangements — but it does not explore whether a more ambitious or flexible approach could enable Chelmsford to assist with unmet need from neighbouring areas.

Chelmsford's proposed Spatial Strategy focuses on distributing growth to the most sustainable locations, including Key Service Settlements such as Danbury. The strategy itself is inherently capable of accommodating higher levels of growth if additional sites were allocated. The Council has not tested spatial options involving an increased level of growth in sustainable settlements like Danbury, which could provide the necessary capacity to help meet neighbouring unmet housing needs. It would be both logical and appropriate for the Council to test spatial options that involve allocating a greater number of sites in Key Service Settlements, such as Land at Anchor Field in Danbury. This would allow Chelmsford to respond positively to the requests from neighbouring authorities and maximise its ability to meet wider strategic housing needs.

By exploring higher growth scenarios and additional allocations in sustainable settlements, the plan would better reflect Chelmsford's role within the wider Housing Market Area and its ability to contribute positively to unmet housing needs in neighbouring authorities. Testing spatial options that include additional allocations in Key Service Settlements would demonstrate a proactive and justified response to the housing pressures within the wider region and reinforce Chelmsford's position as a key contributor to the sub-regional housing market. Allocating sites such as Land at Anchor Field would also support the strategic objective of promoting sustainable development and ensuring that growth is directed to locations with the infrastructure and services to support it effectively.

ID	PSIIA-33
Person ID	1329384
Full Name	
Company / Organisation	Strutt and Parker (Farms) Limited
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	6.4.40
Question 2 - Please type your comment below:	<p>The latest IIA (January 2025) identifies the key sustainability issues for the Pre-Submission Local Plan, which fed into a framework against which proposals are assessed. It covers the potential environmental, social, economic and health performance of the Local Plan and any reasonable alternatives.</p> <p>6.10 The IIA tested a series of alternative spatial options to that proposed in the Pre-Submission Local Plan, with Option 2b including Chatham Green (instead of Hammonds Farm). Option 2b is described as being rejected for three main reasons:</p> <p>Transport</p> <p>Chatham Green is relatively isolated from the strategic highway network and new railway station, with limited sustainable accessibility or opportunity for solutions.</p> <p>Its relative isolation from existing services and facilities which would lead to higher reliance on the use of the private car.</p> <p>Employment opportunities would be less accessible to the wider population (for example through public transport).</p> <p>Landscape capacity and sensitivity concerns.</p> <p>Limited wastewater capacity to accommodate this development</p> <p>6.11 As with the SHELAA scoring, it appears that the IIA has failed to have regard to the technical evidence submitted by SPFL during the Local Plan process.</p> <p>For details of comments, See attachment for full representation: 1329384PS-A</p> <p>See Paras 6.9 to 6.47.</p> <p>See also the following supporting documents/appendices referenced in the representation.</p> <p>1329384PS-B (App 1 Copy of Reg 18 Submission)</p> <p>1329384PS-C (App 2 Proposed Masterplan)</p> <p>1329384PS-D (App 3 Vision)</p> <p>1329384PS-E (App 4 Residential Capacity)</p> <p>1329384PS-F (App 5 Access Tech Note)</p> <p>1329384PS-G (App 6 Mobility Strategy)</p> <p>1329384PS-H (App 7 Heritage)</p> <p>1329384PS-I (App 8 SHELAA Output)</p> <p>1329384PS-J (App 9 Sustainable Transport)</p>

	1329384PS-K (App 10 LVA)
Attachment/s	1329384PS-A (Main Rep).pdf 1329384PS-F (App 5 Access Tech Note).pdf 1329384PS-G (App 6 Mobility Strategy).pdf 1329384PS-J (App 9 Sustainable Transport).pdf 1329384PS-K (App 10 LVA).pdf

ID	PSIIA-26
Person ID	1380218
Company / Organisation	Taylor Wimpey Strategic Land
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Reasonable Alternatives
Question 2 - Please type your comment below:	<p>4.1 As with Strategic Policy S6, TWSL's concerns with Strategy Policy S7 (the Spatial Strategy) include those set out within the Joint Representation.</p> <p>4.2 Again, these are not repeated in full here. But for completeness, and in brief, the concerns in respect of the settlement hierarchy can be summarised as follows: • Despite being embedded within the policy text, as presently worded it is unclear how the settlement hierarchy is intended to be used by decision-makers. • The settlement hierarchy implies an equivalence between Chelmsford and South Woodham Ferrers, despite fundamental differences between the settlements and the former being a far more sustainable settlement to which to direct growth.</p> <p>4.3 In respect of the broad locations and strategic approach advocated by Strategic Policy S7, and in addition to the concerns set out in the Joint Representation, we wish to raise the following.</p> <p>4.4 The IIA notes six spatial strategy options that were considered, but that it only considers the Site as part of a much larger growth in West Chelmsford, despite the availability of smaller sites to the west of Chelmsford to come forward either individually or as part of more strategic growth.</p> <p>4.5 The NPPF expressly notes that "Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly" (paragraph 70).</p> <p>4.6 The exploration of potential spatial strategies, and the appraisal of options, should not be limited to those that entail large-scale strategic growth to the west of Chelmsford.</p> <p>4.7 One consequence of the proposed spatial strategy's focus on large-scale strategic growth sites is that the DLP becomes reliant on a small number of large, potentially complex, sites to deliver housing. This does not render the allocation of such sites unsound, but the over-reliance on such sites to meet housing needs without additional allocation of smaller sites to ensure the new Local Plan is imbued with sufficient flexibility to be able to meet housing needs in a timely manner, is a soundness issue.</p> <p>4.8 Large scale strategic growth sites typically comprising over 1,000 dwellings typically take c.5 years to progress through the planning approval process, and a further year to begin to deliver homes. This is based on the average time to obtain outline permission, followed by reserved matters, and then the period from planning consent to delivery of homes. In the case of Chelmsford, it should also be noted that Strategic Growth Sites are required to go through the Council's masterplanning procedure. This is currently a three-stage process, requiring two rounds of consultation, and based on sites coming forward through the current Development Plan, can take several years to adopt.</p> <p>4.9 In such circumstances, it is particularly important to ensure a range of different sites that can address housing needs in the event progress of others is slowed.</p> <p>4.10 Separately, as noted within the Joint Representations but also of particular relevance to the Site, it is notable that the criticisms and reasons given for the rejection of options that entail large-scale growth to the west of Chelmsford appear largely confined to the provision of employment land at Howe Green, which has been rolled into the option that includes West Chelmsford. In short, the IIA does not justify the rejection of the Site / West Chelmsford as it is required to do, bearing in mind the intended purposes of the IIA as per the NPPF and the requirements of the SEA Regulations.</p>

ID	PSIIA-38
Person ID	1398045
Full Name	
Company / Organisation	This Land
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Appendix D
Question 2 - Please type your comment below:	<p>The Integrated Impact Assessment (IIA), acknowledges that as a Key Service Settlement they have access to a good range of facilities and are located on important public transport corridors. These services may include primary schools, local employment opportunities, shops, community facilities, good public transport links, surgeries and green spaces.</p> <p>The IIA continues that the station and Boreham Interchange will create an important transport hub, which in turn will help stimulate investment and development in the area.</p> <p>Appendix D of the IIA confirms Boreham's key characteristics. However, in summary the village of Boreham has a population of approximately 4,000 people and is well served by local services and facilities. The village benefits from a primary school, village hall (and village green), a church, doctor's surgery, Co-op foodstore, 3 pubs and a parade of shops that include a post office. The village is well served by public transport, with various bus services that run along Main Road between Chelmsford, Witham, Colchester and Maldon. There are also services that loop around the village via Plantation Road / Church Road.</p> <p>To make the plan sound, the Council must reconsider its approach to the spatial strategy and the settlement hierarchy, in particular Boreham's housing growth within the spatial strategy. The lack of growth proposed for the Key Service Settlement suggests the spatial strategy is already failing, in distributing growth across the City Area. A growth target for Boreham should be ambitious to reflect the strategic housing requirement and Boreham's sustainable status as a Key Service Settlement. This will ensure that Boreham's growth is not artificially constrained and that it makes a contribution (not just an appropriate contribution) to Chelmsford's housing supply over the extended plan period. The IIA must also be updated to test growth scenarios for Boreham, ensuring all reasonable alternatives are fully assessed. Without this, the Local Plan risks being found unsound at examination and requiring significant modification.</p> <p>See Attachment for full rep: 1380393PS-A</p>
Attachment/s	1380393PS-A.pdf

ID	PSIIA-34
Person ID	1325358
Full Name	
Company / Organisation	Tritton Farming Partnership LLP
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	6.6.40
Question 2 - Please type your comment below:	<p>The reasons for the rejection / selection of options are set out in the Integrated Impact Assessment which accompanies the Local Plan Pre-Submission (Regulation 19) Document. The IIA seeks to discharge the Council's obligations under Directive 2001/42/EC ('the SEA Directive'); the plan-making aspects of which are transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No.1633) ('the SEA Regulations'). Such requirements include the need to assess reasonable alternatives to the same level of detail as those that have been selected; and to explain the reason for rejection / selection of options.</p> <p>3.43 Looking specifically at the consideration of the Site as part of Option 2b, the IIA provides the following reasons for rejection of the Options :</p> <ul style="list-style-type: none"> • Chatham Green is relatively isolated from the strategic highway network and new railway station, with limited sustainable accessibility or opportunity for solutions. • Its relative isolation from existing services and facilities which would lead to higher reliance on the use of the private car. • Landscape capacity and sensitivity concerns. • There is limited wastewater capacity to accommodate this development (Water Cycle Study 2024). • Employment opportunities would be less accessible to the wider population (for example through public transport). <p>3.44</p> <p>Firstly, that Chatham Green is relatively isolated from the strategic highway network and new railway station, with limited sustainable accessibility or opportunity for solutions. The Site would utilise significant infrastructure improvements being delivered and planned (as large scale proposals should), most notably the CNEB and Beaulieu Park Rail Station. Furthermore, it has the potential to help ensure that Section 1b and Section 2 of the CNEB are delivered, with resultant benefits to the wider community.</p> <p>3.45 Secondly, that Chatham Green is relatively isolated from existing services and facilities, and consequently growth at this location would lead to reliance on the private car. The IIA's concerns in respect of the Site's isolation from services and facilities is misplaced, as it overlooks that a new community is proposed of a scale such that some services and facilities will be provided as part of the new development, and in close proximity to future residents. Furthermore and in any case, the Site is in proximity to a number of existing services and facilities planned or recently brought forward as part of strategic scale growth in North East Chelmsford which are accessible / can be made accessible by sustainable transport modes as part of development of the Site, including the existing bus routes along the A131 and the cycle routes planned for CNEB.</p> <p>3.46 Thirdly, landscape capacity and sensitivity. The justification for this stance is unclear. Land to the east of Chatham Green is not subject to any landscape designations which suggest it is any more sensitive than any other greenfield land in the borough.</p> <p>3.47 Fourthly, that there is limited capacity at the wastewater recycling facilities serving the area. A Foul Drainage Technical Note was commissioned to consider the capacity concerns raised and whether there are any potential options to mitigate this. A copy of this Technical Note is provided as Appendix D. The Technical Note confirms that this potential constraint can be overcome, identifying three options. One option includes utilising land under the Tritton Farming Partnership's control.</p> <p>3.48</p> <p>Lastly, that employment opportunities would be less accessible to the wider population (for example through public transport). Development on the site could be at a scale that provides the opportunity for improvements to public transport and sustainable travel including the existing bus routes along the A131 and the cycle routes planned for CNEB.</p> <p>3.49 In overview, none of the reasons cited by the IIA for the rejection of strategic level growth at Chatham Green are applicable to the Site (i.e. are not applicable to Land East of Chatham Green) and its proposed development for a new community.</p> <p>See Attachment for full rep: 1325358PS-A</p>
Attachment/s	1325358PS-A (Main Rep).pdf

1372195, Vistry Group

ID	PSIIA-9
Person ID	1372195
Company / Organisation	Vistry Group
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Section 6.4.30
Question 1	No
Question 2 - Please type your comment below:	Please see attached representation
Question 3	Please see attached representation
Attachment/s	Chelmsford Reps Integrated Impact Assessment - Final.pdf

ID	PSIIA-25
Person ID	1329392
Full Name	
Company / Organisation	Wates Developments Limited
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	6.4.25
Question 2 - Please type your comment below:	<p>In our previous Regulation 18 submissions, we highlighted concerns in relation to the lack of an assessment of growth at Boreham as a spatial option and the general consistency of approach taken in relation to the SHELAA assessment of Site CFS 52. Wates are again disappointed, that the Sustainability Appraisal (SA) and the Integrated Impact Assessment (IIA) have continued to progress a spatial strategy which does not include any residential growth at Boreham, despite its status as a KSS and its proximity to other major residential and employment allocations, east of Chelmsford.</p> <p>Wates notes that an Integrated Impact Assessment (IIA) has been prepared, which has tested all 383 sites contained in the SHELAA against a range of individual assessment criteria. Whilst it is noted that the IIA has assessed a number of site proposals in Boreham, including Sites CFS 52 and CFS 145, these have all been tested on an individual basis and there has been no assessment of a wider strategy that includes Boreham as a growth location in principle. The question therefore remains as to why Boreham, as a KSS, is ranked as a suitable and sustainable location for strategic employment growth, but is still excluded from further new housing growth, even when housing needs have materially increased under the new standard method.</p> <p>See attachment for full rep: 1329392PS-A; and 1329392PS-B for Vision Document</p>
Attachment/s	1329392PS-A.pdf 1329392PS-B.pdf

ID	PSIIA-13
Person ID	872955
Full Name	
Company / Organisation	Wates Developments and Hammonds Estates LLP
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Sustainability Appraisal, Habitats Regulations Assessment
Question 1	Yes
Question 2 - Please type your comment below:	<p>As site promoter of Site 16a East Chelmsford Garden Community (Hammonds Farm) Wates Development and Hammonds Estates LLP support the evidence provided by the Council's IIA.</p> <p>As referenced in our representations on the Spatial Strategy, the selection of the Spatial Strategy set out in Policy S7 is underpinned by the Council's Sustainability Appraisal (part of the Integrated Impact Assessment), which as directed by Section 19(5) of the Planning and Compulsory Purchase Act 2004, has guided the selection and development of policies and proposals in terms of their potential social, environmental and economic effects. The IIA is a thorough study, making full assessment of policies and alternatives considered. This Sustainability Appraisal makes reference to the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment Regulations') and there is no reason to assume these are not fully met.</p> <p>The preparation of the Local Plan Review and the Spatial Strategy thus fulfils the NPPF Paragraph 32 requirements relating to sustainability appraisal, as well as the soundness test that requires a plan to demonstrate that it is an appropriate strategy, when considered against reasonable alternatives, to be considered justified. Our analysis of the authority's steps below in preparing the Spatial Strategy and assessing the effects of its policies, suggests that the Local Plan meets the NPPF tests of soundness:</p> <p>Consultation on a Scoping process for the SA has been carried out, and it provides responses to representations made at each stage.</p> <p>The I&O stage SA assessed the five spatial approaches against the sustainability objectives, referring to the use of the council's evidence base.</p> <p>The Preferred Option stage SA tested the environmental effects of the selected Spatial Strategy, comparing these to effects from the alternatives tested at Issues and Options stage, and set out reasons for the selection of the Spatial Strategy. This indicated that the Preferred Option was an evolved hybrid of the I&O options based on further evidence work prepared.</p> <p>The Pre-Submission stage SA set out analysis of further variations to the Spatial Strategy, both in spatial terms by examining alternative locations for a large strategic scale development, as well as quantitative variations in the level of housing provision.</p> <p>We note the increase in the committed development position at North-East Chelmsford from 3,000 homes allocated in the adopted Local Plan, to 6,250 homes in the Local Plan Review due to the full quantum spanning plan periods receiving approval at masterplan stage and included in outline planning application proposals. This growth represents a significant expansion of North East Chelmsford during this plan period, and a change in the baseline since the Issues and Options consultation, so we read the progression of the options on this basis.</p> <p>The sites allocated in the Local Plan Review have been selected on the basis of appropriate evidence, noting the NPPF requirement for plan-making evidence to be "adequate and proportionate, focused tightly on supporting and justifying the policies concerned" (Paragraph 31). The site allocations are consistent with the Spatial Strategy, which we believe represents a logical approach to sustainable development by continuing the adopted Spatial Strategy. Our review of the successive stages of plan-making, including the preparation of an extensive evidence base and Integrated Impact Assessment that underpin it, suggest that the Spatial Strategy meets the NPPF tests of soundness and has had full regard to the legal requirements for plan-making.</p> <p>East Chelmsford Grden Community (Hammonds Farm) as a sustainable location</p> <p>The Integrated Impact Assessment of Local Plan Review provides in our view a careful consideration of the sustainability issues associated with Strategic Growth Site 16a (Hammonds Farm), which is considered to deliver major benefits in comparison to an aggregation of smaller-scale sites, and to outperform the other Reasonable Alternative options – as assessed in Table 6.5 of the IIA (p.183). We agree with this finding.</p> <p>Within Appendix G, the Appraisal of the Site Allocations assesses the following aspects of the site. We agree with the findings, and believe they underpin the Hammonds Farm site's clear credentials as a sustainable location:</p>

Significant positive effects recorded for Housing, Economy, Sustainable Living and Revitalisation and Health and Wellbeing, recognising the benefits the site's delivery of mixed land uses and the provision of community and green infrastructure, open space, health facilities, leisure facilities and walking/cycling links brings. This reflects the project vision and its focus on family and community success, safety and wellbeing, especially for women and girls.

Significant positive and/or minor negative effects for Transport, reflecting the significant opportunities of the site to connect meaningfully to established infrastructure and embed sustainable modes of travel into everyday journeys and behaviours, whilst recognising the need to manage traffic through infrastructure mitigation.

Potential effects on Cultural Heritage and Landscape and Townscape, which are acknowledged as being capable of being mitigated by policy requirements that can mitigate the landscape/visual and heritage impacts of the development.

Potential effects on Water and Flood Risk due to the presence of water courses and Flood Zones 2 and 3, which again can be mitigated through design solutions, and are suitably controlled by specific masterplanning principles and policy requirements.

Potential impacts on biodiversity, which again can be mitigated through policies requiring landscape buffers to the development edges and Local Wildlife sites.

We support the finding of the IIA that the location of Site 16a to the east of Chelmsford benefits from proximity to Chelmsford's rail infrastructure including the new Beaulieu Park station, and can utilise the East Chelmsford Green Wedge for active, multi-functional routes into Chelmsford. The site co-locates housing, employment, community infrastructure and amenities in a manner that encourages self-containment, high levels of accessibility and has opportunities for new sustainable transport provision and active travel connectivity, helping to avoid longer journeys by car. The location supports delivery of an onsite secondary school, as well as primary schools, and employment that will be accessible by public transport by the wider communities of East Chelmsford. It is therefore a sustainable location.

Alternative Sites

We agree with the IIA's narrative on the selection of the preferred approach, and the rejection of alternatives, and consider that this is well articulated in paragraphs 6.4.46 to 6.4.53 of the IIA. We agree that the Council's evidence base supports its findings that potential alternative development at Chatham Green, West and North West Chelmsford, and Howe Green and Rettenden Common would not achieve the same level of sustainability benefits as Hammonds Farm, especially in respect of Objective 4 (Sustainable Living and Revitalisation) and Objective 6 (Transport), due to their lower proximity to established sustainable infrastructure connections; limited opportunities to provide new public transport connections, and the relative isolation of employment opportunities provided, with consequent reliance on use of the private car. The Council would therefore miss an opportunity to secure the sustainability objectives set out in the Pre-Submission Local Plan. At this stage of testing, all of the Reasonable Alternatives / Spatial Strategy Options defined in the IIA benefit from the potential scale opportunities of a single strategic site, eg self-containment, co-location of housing, employment, community amenities and mixed communities. This appraisal therefore robustly tests a like-for-like situation, and the sites' respective geographical comparative advantages.

The inclusion of Appendix M in the Reg 19 IIA offers an assessment of all SHELAA Sites: Methodology And Outputs (IIA p.788), and this is helpful in demonstrating how all sites which are captured within the SHELAA have been subject to GIS analysis against the fourteen IIA Objectives, in addition to the many layers of evidence base that support the Local Plan and as a result it can be agreed that an equal appraisal of all proposal sites has been undertaken.

The result of this appraisal finds clearly that the Pre-Submission Local Plan Review, including the Hammonds Farm site as Site 16a, is justified and supported by appropriate evidence.

Habitats Regulations Assessment

A Habitats Regulations Assessment (HRA) report has been prepared as part of the Integrated Impact Assessment (IIA). It does not constitute a formal HRA screening or appropriate assessment as the Local Plan Review is still in development. However, the principles of HRA have been applied to the Pre-Submission Local Plan Review to provide an assessment of the likely HRA conclusions. This document sets out what are considered to be the relevant pathways from the Local Plan (including proposed Strategic Growth Sites) to international designations and accounts for measures included within policy to mitigate potential effects. The council's HRA concludes no adverse effects on the integrity of any European sites as a result of the Local Plan Review and its policy measures.

A project level HRA will be required to accompany a planning application and site-specific mitigations measures will need to be developed in accordance with policy, however, the Local Plan HRA indicates that development at the Site can be achieved without adverse effects on the integrity of European designations. As set out within the IIA HRA, and as outlined in Section 4 of our submitted Ecological Appraisal, we consider that development at the Site is unlikely to significantly affect the nearby international designations, subject to mitigation and detailed assessment via a project level HRA at the planning application stage.

The full text of our Written Representations is provided as an attached PDF.

Question 3	No
Question 4 - Executive Summary	See above
Attachment/s	Written Representations - Wates and Hammonds Estates.pdf (31)

ID	PSIIA-21
Person ID	1311674
Full Name	
Company / Organisation	Weal Properties Ltd
Consultation point - Please state the relevant paragraph/table/figure/appendix to the IIA your comment relates to:	Para 6.4.14
Question 2 - Please type your comment below:	<p>Settlement Hierarchy</p> <p>Utilising a settlement hierarchy to guide the distribution of development within the administrative area is deemed a logical and conventional approach, which has been successfully employed in the preparation of numerous sound Local Plans in recent years. This method can be a valuable tool for ensuring sustainable distribution of development, although it is crucial that its application to policies and allocation should not be overly simplistic and should account for broader sustainability considerations.</p> <p>We support the designation of Little Waltham Service Settlement. Service Settlements have more limited services and facilities but typically include primary schools, convenience shopping facilities and community facilities making them suitable for a more limited scale of development. This is confirmed in paragraph 6.27 of the DLP.</p> <p>Although we agree with the use of a settlement hierarchy to inform decisions regarding the scale of growth directed to various settlements within the borough, the current wording of the policy text makes it unclear how the settlement hierarchy outlined in Strategic Policy S7 is to be utilized by decision-makers.</p> <p>If the settlement hierarchy merely provides an explanation for the proposed distribution of growth in the subsequent section of Strategic Policy S7, it might be necessary to remove it from the policy and place it within the reasoned justification. In this context, we wish to highlight a similar issue recently addressed through the examination of the West Suffolk Local Plan. In this case, the settlement hierarchy and dwelling distribution by settlement were included in the submitted policy text. However, one of the Inspectors' actions for West Suffolk Council arising from the examination hearing sessions was to remove this table from the policy text and place it in the reasoned justification.</p> <p>While the above represents a potential way to handle the settlement hierarchy if it serves no function other than justifying subsequent policies or allocations, it does not address concerns that the Local Plan may fail to deliver sufficient homes to meet community needs.</p> <p>In this respect, we propose an alternative solution that better aligns with national policy and would enable the Local Plan to be considered positively prepared: maintaining the settlement hierarchy within Strategic Policy S7, accompanied by explanatory text instructing decision-makers to direct additional growth beyond that designated on sites allocated by the Local Plan. For example, it could clarify that potential residential development sites beyond settlement boundaries would still be considered positively, considering the settlement hierarchy and other Local Plan and national policies. Such an approach would help mitigate the fact that the submitted Local Plan seeks to provide fewer homes than the current Standard Method should require to address the housing crisis, addressing the concerns identified regarding Strategic Policy S7.</p> <p>One does not have to look far for a potential example of how such a policy could be set out. In neighbouring authorities' North Essex Authorities' Shared Strategic Section 1 Plan, Policy SP 3 includes the following: "Existing settlements will be the principal focus for additional growth across the North Essex Authorities area within the Local Plan period. Development will be accommodated within or adjoining settlements according to their scale, sustainability and existing role both within each individual district and, where relevant, across the wider strategic area. "Future growth will be planned to ensure existing settlements maintain their distinctive character and role, to avoid coalescence between them and to conserve their setting. Re-use of previously developed land within settlements is an important objective, although this will be assessed within the broader context of sustainable development principles, particularly to ensure that development locations are accessible by a choice of means of travel." (Emphasis added).</p> <p>The above was found sound in relation to the NPPF 2012.</p> <p>One way to reword the current Policy S7 having regard to all of the above, would be as follows: Development will be brought forward in accordance with the Spatial Strategy Development Locations and Allocation, as well as through development within and adjoining existing settlements having regard to the settlement hierarchy below, as well as other policies within this Plan and the NPPF, read as a whole.</p> <p>The above modifications would need to be made in conjunction with changes to other policies and text within the emerging Local Plan, including that which classifies any land beyond the Defined Settlement Boundaries as Rural Area, and adopts a negative stance to residential development of such.</p> <p>The alternative to the above would be to simply move the settlement hierarchy table to the reasoned justification text, but seek to increase the number of new homes the Local Plan will deliver through alternative means, e.g. by increasing the number of sites allocated for development.</p> <p>Spatial Strategy Options and the Green Wedge</p>

The Integrated Impact Assessment (IIA) acknowledges that to meet residential and employment needs under transitional and higher growth levels, additional site options beyond the existing Local Plan allocations will be required (paragraph 6.4.29).

The IIA confirms that site options within the Metropolitan Green Belt and Green Wedge would not be considered as part of the spatial options to meet residual needs. This, it explains, is primarily because there are sufficient and suitable site options available outside of these areas in order to meet the proposed development requirements. However, meeting development needs is not simply about fulfilling housing numbers to accommodate future growth in purely numerical terms — it is incumbent upon the plan-making process to ensure the Local Plan will do so in a sustainable manner. Case law (e.g. Calverton) confirms that a key factor in determining whether there are exceptional circumstances which justify alterations to the Green Belt is whether it is possible to meet development needs sustainably without doing so.

Green Belt is of course a national designation to which the NPPF attaches great importance.

Unlike the Green Belt, the Green Wedge is a local spatial designation in Chelmsford. There is no national planning policy that gives the Green Wedge the same level of protection as the Green Belt in terms of its permanence and openness throughout the plan period. Consequently, it is even less justified for the plan-making process to simply reject any options entailing development of land within them than it is for the process to automatically reject any development in the Green Belt, without considering the implications of such an approach on achieving sustainable development.

Despite Green Wedge lacking any recognition in national planning policy, and conversely the NPPF expressly confirming that the Government attaches great importance to Green Belt, one could infer from the DLP that it is seeking to afford Green a similar level of protection across Chelmsford as the Green Belt. While altering Green Belt boundaries requires demonstrating exceptional circumstances through the local plan-making process, this is not and should not be the case for the Green Wedge.

Although openness is a function of the Green Wedge, its value lies more in its landscape and environmental attributes, as highlighted in paragraphs 6.4.31 to 6.4.33 of the IIA:

The Green Wedge contains land that is important for nature conservation, recreation and access. The valleys and flood plain of the Rivers Chelmer, Wid and Can will continue to be protected as Green Wedge through Chelmsford's Urban Area. The existing Green Wedge has played an important role in shaping the form and character of Chelmsford and providing physical links to the countryside. It also provides an important amenity, recreation and nature conservation resource. In line with a Green Wedge Assessment 2017 and a 2024 technical update, the general extent of the existing Green Wedge will be maintained.

Part of the Green Wedge is covered by Living Landscapes. These are identified by Essex Wildlife Trust across Chelmsford and contain key areas of landscape which are promoted for nature conservation, wildlife habitats, public enjoyment and adaptation to climate change.

It is intended that the crucial role of the main river valleys where they permeate into the existing or proposed urban areas i.e. the Green Wedge, will be protected and enhanced as valued and multifaceted landscapes for their openness and function as important green networks for wildlife, leisure and recreation, and development which materially harms the role, function, character and appearance of this valued landscape will be restricted.

Unlike the Green Belt, whose primary function is to remain permanently open, the Green Wedge is more focused on environmental and landscape qualities. Therefore, it is reasonable to suggest that large parts of the Green Wedge, including Campion Farm, perform poorly against the key objectives and characteristics that the designation seeks to protect from harmful development. It is not justified to simply assume that any loss of Green Wedge is intrinsically unsuitable and / or unsustainable; or that alternatives that do not entail loss of Green Wedge are inherently more sustainable than options which do.

The IIA suggests that residual housing needs can be met without using sites within the Green Wedge. However, it also notes that Chelmsford City Council has received requests from Castle Point Borough Council, Southend-on-Sea City Council, and Basildon Borough Council to help meet their unmet housing needs through Chelmsford's Local Plan allocations (paragraph 6.4.11). The IIA further states that Chelmsford's proposed Spatial Strategy has no capacity to accommodate unmet housing needs from neighbouring authorities (paragraph 6.4.14). Therefore, it would be logical and appropriate to test spatial options involving the release of land from the Green Wedge to help address this shortfall. As acknowledged in paragraph 6.4.15, even providing the full standard method assessment of 1,454 homes per annum would create capacity for some neighbouring unmet need — a scenario based on a spatial option that does not release land for housing from the Green Wedge.

The IIA has therefore failed to test all reasonable alternatives. Discounting all sites within the Green Wedge without properly assessing them as reasonable alternatives makes the proposed Spatial Strategy unjustified and unsound.

However, the Spatial Strategy can be made sound by allocating sites within the Green Wedge, such as land south of Winckford Close, to support higher housing delivery and, in part, help meet the unmet housing needs of neighbouring authorities.

Furthermore, and for the avoidance of doubt, it should be noted that the concerns we have raised in respect of the IIA should not be viewed as fatal to the plan-making process — as confirmed through the Cogent judgment, defects in the SEA process can be addressed, even at an advanced stage in the plan-making process.



Chelmsford Local Plan

2 Representations to the Integrated Impact Assessment:
Additional Sites (Regulation 19) Addendum
By representor order

May 2026

ID	ASIIA-48
Person ID	1397946
Company / Organisation	Barratt David Wilson
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Assessment of land to east of Site 3c
Question 2 - Please provide an explanation below:	<p>These representations have been prepared on behalf of Barratt David Wilson Eastern Counties (BDW).</p> <p>These representations comment on the Focused Consultation Additional Sites (Reg 19) Consultation, November 2025 and its supporting evidence set out in the Integrated Impact Assessment Focused Additional Sites Addendum.</p> <p>These representations are made in the context of existing adopted allocated Strategic Growth Sites 3b, 3c and 3d at East Chelmsford (as illustrated by Figure 1 below (See attachment 1397946AS-A) and future potential for growth on Land to the east of Site 3c, to the north of Sandon and bounded by the A12 to the east.</p> <p>Site Selection Process</p> <p>Paragraph 1.28 of the Additional Sites Reg 19 document sets out the process of selecting the additional sites for new homes and employment land as follows:</p> <ul style="list-style-type: none"> • “Assessing sites promoted for development in the Council’s Strategic Housing and Employment Land Availability Assessment (SHELAA) and identifying sites capable of being delivered in full or part over the next 5 years (in the case of housing) • Identifying sites in the top three-tiers of the Settlement Hierarchy (Chelmsford, South Woodham Ferrers, and Key Service Settlements and Service Settlements) and outside the Green Belt and Green Wedge in accordance with the Pre-Submission (Regulation 19) Local Plan Spatial Strategy (Policy S7) • Considering the findings of the additional sites sustainability appraisal work (through the Integrated Impact Assessment) • Undertaking additional housing site studies which consider a range of matters including access, topography, neighbouring land uses and other physical constraints • Commissioning technical evidence base testing including in relation to education, wastewater, archaeology, heritage, and landscape sensitivity and capacity to inform the suitability of sites and areas for mitigation where relevant.” <p>Whilst this process is generally accepted, as it follows the work undertaken for the Reg 19 Submission Plan, it does not comply completely with the December 2024 NPPF which was published just before the Submission Plan.</p> <p>The December 2024 NPPF sets out key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes. These policies refer to the following NPPF paragraphs:</p> <ul style="list-style-type: none"> • 66 - mix of affordable housing; • 84 - avoid isolated homes in the countryside; • 91 – sequential test for main town centre use; • 110 – actively manage patterns of growth to support the sustainable transport objectives set out in paragraph 109: <ul style="list-style-type: none"> “a) making transport considerations an important part of early engagement with local communities; b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places; c) understanding and addressing the potential impacts of development on transport networks; d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated; e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.” • 115 - In assessing sites, it should be ensured that:

- “a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users;
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach. “

- 129 – making efficient use of land by taking into account:

“a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

b) local market conditions and viability;

c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and e) the importance of securing well-designed, attractive and healthy places;

- 135 f)– create well designed, safe, inclusive and accessible places which promote health and well-being; and

- 139 – development should reflect local design policies.

As can be seen by highlighted paragraphs 110 d), e) and f); paragraph 115 a); paragraph 129 c) and e); and paragraph 135 f) (See attachment 1397946AS-A) there is significant emphasis on transport sustainability and health and well-being of new residents.

First, significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes, as this can help to reduce congestion and emissions, and improve air quality and public health.

Secondly, opportunities from existing or proposed transport infrastructure should be realised, particularly in relation to the scale, location or density of development that can be accommodated.

Thirdly, when assessing sites sustainable transport modes should be prioritised taking account of the vision for the site, the type of development and its location.

Fourthly, plan-making and development proposals should identify and pursue opportunities to promote walking, cycling and public transport use to optimise health and well-being.

BDW believe that the weight of these sustainable transport policies has not been accurately reflected in the Integrated Impact Assessment, as all aspects have been given equal weight in the assessment as demonstrated by the extracts of table below at paragraph 2.18, which is clearly not the intention of the NPPF when read as a whole.

The Selected Sites

Clearly it is important for CCC to meet its five year housing land supply, but it also must meet its increased LHN over the Plan period. This must be done in accordance with the NPPF, which for plan-making means the Plan has to accord with paragraph 11a) on the presumption in favour of sustainable development and, “promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;”.

The Council has selected some additional sites which accord with paragraph 11a) and the NPPF as a whole, but there are others – particularly in some lower order Tier 3 settlements – that do not and cannot be made to accord with NPPF policies, and therefore render the process and the sites selected unsound.

This is of particular concern when other – more sustainable and NPPF compliant sites - have been promoted, but rejected.

For example, Land east of Site 3c is immediately south of the Sandon Park and Ride, including its permitted extension, so residents would benefit from this existing (and expanding) facility which is within easy walking and cycling distance. Residents would be a 9-minute journey away from Chelmsford centre and rail station. Residents would also benefit from the significant additional pedestrian and cycle infrastructure being provided in and around Site Allocations 3c and 3d, linking the area to services and facilities in Great Baddow and Chelmsford, as well as the nearby country park that forms part of the Hopkins application proposals for allocated Site 3a. It’s development would complete the East of Chelmsford Growth Area, and fill in the gap between Site 3c and the A12 (as shown on the Annotated CCC Reg 19 Policy Map Appendix 3) (See attachment 1397946AS-A) making Land east of Site 3c one of the most sustainable sites in the district along with the adjacent allocation. See Section 3 for more details of this opportunity.

In regard to the NPPF policies listed above, Land east of Site 3c is a more sustainable location and will make more effective use of land than the proposed additional allocations (See attachment 1397946AS-A pages 6-7).

In terms of performance in the Integrated Impact Assessment, it can be assumed that Land to the east of Site 3c would score the same as Site 3c itself, as it was assessed in the SHLAA as the same site, CFS100, half of which was allocated and therefore considered sustainable. The comparison overleaf (See attachment 1397946AS-A page 8) shows how much better Land to the east of Site 3c performs than proposed Sites 14b, 17c,17d, 17e and 20.

	<p>As such, BDW believes there is absolutely no need for the allocation of proposed Sites 14b, 17c, 17d, 17e and 20 when there is a more sustainable and higher scoring site that can optimise existing and proposed active travel links.</p> <p>In terms of delivery, Land east of Site 3c can be brought forward by BDW, the nation's leading housebuilder, as a continuation of the delivery of allocated sites 3d and 3c, as shown in Section 3 of these representations and the amended trajectory in Appendix 1 (See attachment 1397946AS-A).</p> <p>As such, BDW finds it regrettable and surprising that CCC has not taken this opportunity to sustainably expand the existing allocation of Strategic Growth Area 3 by allocating Land east of 3c, to assist with delivery in the Plan period and in meeting the increased housing need in Chelmsford.</p> <p>Delivery of sites in a plan-led system come not only from allocating sites but from the certainty afforded to developers through allocation, as well as the approach taken by and the capacity of the authority and statutory consultees. It is accepted that Councils wish to see appropriately designed and high quality developments, but changing policy requirements which increase the financial and deliverability burdens and increasing s106 infrastructure requirements whilst considering applications does not assist timely delivery of housing.</p> <p>It is also noted that the majority of the proposed additional sites are subject to the provision of a Council approved masterplan. Allocated Sites 3b, 3c and 3d were subject to this requirement, which resulted in a 76 page document and took many months to draft and agree. Then regardless of that work, the development and financial requirements expanded despite the recent adoption of the Plan and the Masterplan document.</p> <p>Since that time, CCC is now proposing additional policy requirements making the costs of delivery more onerous. It should be noted that BDW made representations to the Pre-Submission Local Plan objecting to the addition of policy requirements for Sites 3c and 3d for the provision of necessary mitigation and financial contributions to the cumulative pressure on the Blakes Wood, Danbury Common and Lingwood Common SSSIs, rendered necessary by the additional allocation of the substantial and neighbouring Hammonds Farm development under Policies 16a and 16b and the lack of consideration of the mitigation provisions already being made by the east of Chelmsford allocations.</p> <p>Further, BDW noted in its representations to the changes to Pre-Submission Policy 3c that the additional highway infrastructure agreed during negotiations on the previous application has been added, but the 'catch all' policy requirement, which could enable any further infrastructure requirements was still in place. To give certainty and clarity, and to be Reg 122 compliant and be delivered, the policy should set out, quantify and justify what infrastructure is required by the proposals. It should not then have 'catch all' criteria as well, which could allow the Highways Authority to add further infrastructure that has not been accounted for within the proposals and potentially increasing further delays in delivery.</p> <p>The trajectories of the Additional Sites on the whole start with completions of dwellings in 2027/28 or 2028/29, mostly from a standing start, where no site surveys have been undertaken, no Masterplan is in place or pre-application negotiations started. In the experience of BDW - and from the evidence on the Hopkins application on Site 3a – this assumed timetable seems very optimistic – and incredibly burdensome for planning officers, with all these sites and other allocations assumed to come forward at the same time.</p> <p>The advantage of Land to the east of Site 3c is that the principles of house type design will follow on from Sites 3d and 3c, currently being considered in the preapplication process, and the principles of layout etc can be considered within the context of these applications; the allocation of Sites 3a and 3b; the Park & Ride and its expansion; and the constraints known from years of working on the sites. As set out in Section 3 of these representations, there is also a draft Masterplan which takes this context and constraints into account. This automatically puts Land east of Site 3c at least two years ahead of the majority of the proposed Additional Sites in terms of actually delivering on site. Further, it is in BDW's interest to progress from site to site in a smooth continuous manner to optimise construction efficiencies.</p> <p>Complete representation attached - 1397946AS-A)</p>
<p>Question 4 - Executive Summary</p>	<p>These representations have set out comments in respect of CCC's Focused Consultation Additional Sites (Reg 19) document, November 2025 and its supporting evidence.</p> <p>BDW is generally supportive of the Council's approach to growth and its approach to meeting its housing requirements in a sustainable way, building upon what has already been achieved through the adopted Local Plan, and continuing the allocations of Strategic Growth Sites 3b, 3c and 3d. However, the Council is proposing some Additional Sites which no longer support a sustainable pattern of development and do not comply with the policies set out in the December 2024 NPPF.</p> <p>In preference, the Council should expand Policy 3c, as shown on the plan at Appendix 2 (See attachment 1397946AS-A) of these representations to complete the East of Chelmsford Growth Area, filling in the gap between Site 3c and the A12. This would not be a significant change or create delay in the plan-making process, but it would provide an opportunity to provide for the increasing local housing need in Chelmsford in a quicker way than by allocating less sustainable, new sites.</p> <p>Not allocating this site would be a significant missed opportunity to provide a "suitable" sustainable development to complete the expansion of east Chelmsford to the west of the defensible A12 boundary, outside the Green Belt, within close proximity to the Sandon Park and Ride, the new country park being provided as part of Site 3a, employment land being proposed at Site 3b as well as optimising (and contributing to) emerging infrastructure, while also providing additional facilities to serve both existing and new communities. As such, the Focused Consultation Additional Sites (Reg 19) Plan has not been planned positively and is not justified or effective when considered against the tests of soundness.</p>
<p>Attachment/s</p>	<p>1397946AS-A.pdf</p>

ID	ASIIA-14
Person ID	1397557
Full Name	Mr Peter Bayley
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Table 3-2 Assessment of Proposed Site allocations
Question 1	No
Question 2 - Please provide an explanation below:	<p>Page 15, reference- Land West of Patching Hall Lane SGS19.</p> <p>Column 1- Bio-Diversity and Geodiversity. The development will have a significant negative effect on bio-diversity and geodiversity instead of a minor negative effect as indicated in the table.</p> <p>Column 6- Transport. The development will have a minor to significant negative effect on Transport rather than the mixture of positive and negative indicated in the table.</p> <p>Column 14 - Landscapes and Townscapes. The development will have a significant negative effect on the Landscape rather than the neutral effect shown in the table.</p>

ID	ASIIA-11
Person ID	1397422
Full Name	Mr Mark Binnie
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Added sites: 11c – Bicknacre, 21a & 21b – Woodham Ferrers
Question 1	No
Question 2 - Please provide an explanation below:	<p>Added sites: 11c – Bicknacre, 21a & 21b – Woodham Ferrers</p> <p>The site is inappropriate.</p> <p>The existing infrastructure can not cope today - e.g. schools, doctors, dentist and local transport.</p> <p>Building on this site will cause additional flooding from surface water, to properties and roads (Priory and Bicknacre Road). Waterways/streams are not maintained by Environment agency.</p> <p>The current sewerage/waste can not cope with additional waste. Properties on Priory Road, already suffer from sewer backups onto properties, which is a health risk and very unpleasant.</p>
Question 3	<p>(Added sites: 11c – Bicknacre, 21a & 21b – Woodham Ferrers)</p> <p>The infrastructure can not cope today and this proposed build will only exacerbate the problem.</p> <p>The proposed site already has drainage issues that causes surface water to flood Bicknacre Road and Priory Road, making it hazardous.</p> <p>The drainage for sewer/foul waste can also not cope, which Anglia Water have confirmed and regularly have to address emergencies. Properties on Priory Road, ALL suffer from surface water entering the Sewer waste causing it to back up into properties.</p> <p>The streams surrounding this area are not maintained by the Environment agencies and regularly cause flooding to roads and properties.</p> <p>Priory Road is currently restricted to large vehicles/trucks. Additional truck traffic on this road will not only be a major inconvenience it causes damage to roads and the bridge/stream.</p> <p>Access to the site via Barbrook Way is not appropriate and a risk. It is not designed or appropriate for a constant flow of large trucks. This is a developed estate with families and children. The trucks will not be able to pass resident parked cars. The school bus also stops at the end of Barbrook Way. There are children that already have to walk to this stop via a Priory Road with no path. This is dangerous and an accident in waiting.</p> <p>Doctors surgery's, dentists and Schools are already overwhelmed. History tells us the promise of improved infrastructure and services never fully get delivered, with no retrospective action on developers who fail to deliver.</p>

ID	ASIIA-34
Person ID	966105
Full Name	
Company / Organisation	Boreham Parish Council
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	9b LAND TO THE EAST OF 118 TO 124 PLANTATION ROAD, BOREHAM - Lack of clear description and proper IIA
Question 2 - Please provide an explanation below:	<p>The description of this development as being the land to the east of 118 to 124 Plantation Road Boreham does not match the site map of 9b included in the planning notices or in the documentation. The map includes land to the east of 102A to 124 Plantation Road. Therefore, it is unclear whether or not the relevant sections of the Integrated Impact Assessment (IIA): Focused Consultation Additional Sites (Regulation 19) Addendum dated November 2025 cover the entire site shown on the maps. Indeed, it is very unlikely that the description relating to biodiversity and geodiversity of this site in Table 3-2 - Summary Assessment of Proposed Site Allocations of the IIA covers the land to the east of 102A to 116 Plantation Road southernmost of the two fields on the site map. This field has been left 'wild' for many years with only annual mowing and has previously been noted for its biodiversity. It calls into question whether there has been any assessment of the site at all.</p> <p>The lack of a proper IIA is sufficient reason for deeming this site proposal as unsound and it should be rejected.</p> <p>(Complete representation from Boreham Parish Council attached - 966105AS-A BPC Response to Local Plan - Jan 2026.pdf)</p>
Attachment/s	966105AS-A BPC Response to Local Plan - Jan 2026.pdf

ID	ASIIA-43
Person ID	1380259
Company / Organisation	The Bucknell Family
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	2.3.13
Question 2 - Please provide an explanation below:	<p>The SEA Regulations (Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No.1633)) require that an Environmental Report is prepared alongside emerging plans. In the case of the emerging new Local Plan, the Integrated Impact Assessment of the Regulation 19 Addendum evidently seeks to meet this obligation.</p> <p>Additionally, at paragraph 32 of the NPPF, it is made clear that a sustainability appraisal that meets the relevant legal requirements (i.e. the SEA Regulations) should inform Local Plans throughout their preparation, and demonstrate how Local Plans have addressed relevant economic, social and environmental objectives (including opportunities for net gains). As such, the IIA is important to both legal compliance and soundness of the DLP.</p> <p>The SEA Regulations require the Environmental Report to identify, describe, and evaluate the likely significant effects on the environment of proposed options, as well as on reasonable alternatives (Regulation 12(2) of the SEA Regulations). As per Regulation 16 of the SEA Regulations, the Environmental Report is ultimately also required to explain the reasons for selecting options and rejecting others.</p> <p>The Integrated Impact Assessment (the IIA): Focused Consultation Additional Sites (Regulation 19) Addendum accompanies the DLP Addendum. The IIA identifies two options for appraisal: Option 1 entails allocation of the sites proposed at the Regulation 19 iteration of the DLP, but increasing capacities, and additional allocation of small sites (less than 500 dwellings). Option 2 comprises allocation of the same sites proposed in the Regulation 19 DLP, plus allocation of an additional strategic site or sites.</p> <p>Option 1 is selected as the proposed approach for the following reasons:</p> <ul style="list-style-type: none"> • It complies well with the Local Plan's Strategic Priorities, Vision, Spatial Principles. • It is in accordance with the settlement hierarchy. • It performs well in respect of housing and economy and employment, and relatively well in respect of sustainable living and revitalisation, health and wellbeing, and transport. • It makes the best use of existing and proposed infrastructure capacity. • It includes employment sites. • Sites are expected to be delivered within the first five years of the Plan. <p>Option 1 appears to treat all sites as being of equal sustainability and applies blanket conclusions to a basket of sites of varying characteristics, located in various parts of the borough, and providing extensions to different settlements of various positions in the settlement hierarchy.</p> <p>Clearly a reasonable alternative option would have been to consider whether there were additional sites located within the Green Wedge which would be more sustainably located and aligned more strongly with the Plan's development strategy.</p> <p>It is therefore considered that the additional sites allocation process is not appropriate, justified or positively prepared, nor does it reflect the national policy position that the plans should be prepared with the objective of contributing to the achievement of sustainable development. Simply discounting sustainable sites because of the historic policy designation is not considered to represent a positive approach to plan making.</p>
Question 4 - Executive Summary	<p>In conclusion, we consider that the approach that has been taken to the allocation of additional sites has not taken a positive opportunity to make sufficient allocations to genuinely reflect the actual development needs of the community, including those of the small and medium sized local business operators.</p> <p>This was the ideal opportunity for the Council to revisit its strategy and consider the inclusion of appropriate small scale employment sites in the Green Wedge, especially those such as Regiment Park which will actually strengthen the functionality of a large part of the Green Wedge through the release of a small parcel of land which does not contribute strongly to the main purposes of the Green Wedge. This is an obvious opportunity for increased flexibility in the new Local Plan and the delivery of additional employment land.</p> <p>It is therefore considered that the additional sites allocation process is not appropriate, justified or positively prepared, nor does it reflect the national policy position that the plan should be prepared with the objective of contributing to the achievement of sustainable development.</p>

ID	ASIIA-31
Person ID	308535
Full Name	
Company / Organisation	Chignal Parish Council
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Appendix C Appraisal of Additional Proposed Site Allocations/ West of Chelmsford (North of Hollow Lane) - New Site CFS182/18SLAA9
Question 1	No
Question 2 - Please provide an explanation below:	<p>Below are Chignal Parish Council's Responses to the site assessment Objectives used to Justify SGS 18a.</p> <p>Objective 1 – Biodiversity and Geodiversity</p> <p>The stated 'Minor Negative Effect' is felt to be insufficient given the negative effects identified. 'Significant Negative Effect' would be a more appropriate assessment using the evidence below.</p> <ol style="list-style-type: none"> 1. The Broomwood Manor property, and the immediate surrounding rural area, has an abundance of wildlife habitats, something that is rare, so close to urban areas on the boundaries to the city. 2. A Conservation report, produced by the Essex Wildlife Trust in July 2020 on Broomwood Manor, notes the presence of Great Crested Newts, birds of prey, badger sets, a variety of deer, wildflower meadow and large lentic water moat supporting invertebrates, as well as hedgerows supporting owls, bats and birds. 3. The objective as quoted is to "preserve and where appropriate enhance the setting" of Broomwood Manor property, (quoted as Broomwood Lodge), but the proposed intrusive construction activity and housing development immediately adjacent to this historic property would cause significant disturbance to such an important wildlife habitat. 4. Furthermore, the boundary along the driveway leading to the house, which fronts onto the field where the proposed housing will be located, is purposefully open without unnatural fencing/walls with just low hedgerows and plantation. This maintains a rural setting for both the property and for local users of the adjoining footpath to enjoy. 5. Building 100 houses on SGS 18a, including the inappropriate and unsafe proposed estate access onto Chignal Road within metres of the existing driveway to Broomwood Manor, would require a significant investment in establishing and maintaining a landscape buffer to minimise the resulting visual and noise disturbance to residents, footpath users and wildlife. <p>Objective 2 – Housing</p> <p>Clearly any site proposed in the Local Plan would have a positive effect in providing new dwellings to meet imposed Government targets. As evidenced in the Parish Council's challenge as to the "soundness" of the Local Plan, SGS 18a is not Justified as the RAG assessment does not take full account of the importance of retaining this area of open countryside or of the inadequate access that new residents would have to infrastructure, services and facilities which are already at capacity with no plans for expansion.</p> <p>Objective 4 – Sustainable Living and Revitalisation</p> <p>The stated objective effect of 'No Relationship' is felt to be unjustifiable. A 'Minor/Significant Negative Effect' would be more appropriate based on the evidence below that development of site 18a "would not contribute to the provision of additional services and facilities and would increase pressure on existing services and facilities". The development does not appear to offer any new facilities or services; the occupants of the 100 dwellings would put added strain on those that already exist.</p> <ol style="list-style-type: none"> 1. The nearest GP Surgery, Parkside Medical Centre, is over 2.4 KM (1.5 miles) away by road and 30 minutes walking. The closer Dickens Place Surgery is only now available to Private patients. <p>The local medical practices, including Parkside, are under extreme pressure and would find it difficult to serve the occupants of another 100 dwellings.</p> <ol style="list-style-type: none"> 2. The nearest Primary School is Newlands Spring Infants and Junior School, are 1.1 KM away (0.7 miles). The school has no extra capacity at present and has already exceeded its limit of 450 pupils with 488 currently attending (based on information from School website). 3. Secondary Schools include Chelmer Valley High School, located (3.3 miles) away, with Hylands School 5.3 KM (3.7 miles). All of these are not within a reasonable walking distance; cycle routes are inadequate or non-existent; and bus services very limited. 4. The closest Post Office is nearly 2KM (1.2 miles) away on foot, not a reasonable distance, especially for the elderly and those with disability requirements.

5. Morrisons, the local supermarket is within 500m, and walkable via the residential development south of Hollow Lane.
6. The distance to the Railway Station/Bus Station/Town Centre is 4.8 KM (3 miles). Regular bus services are only available from bus stops close to the Morrisons Supermarket.
7. A limited community bus service exists but this would not be suitable or sufficient to service the 100 new dwellings as far as commuting is concerned.

Objective 5 – Health and Wellbeing

The stated 'Minor Positive Effect' is not justified based on the evidence below. 'Minor Negative Effect' would be more appropriate.

1. The nearest GP Surgery, Parkside Medical Centre is 2.4 KM (1.5 miles) away by road and 30 minutes walking. The closer Dickens Place Surgery is only now available to Private patients. The local medical practices, including Parkside, are under extreme pressure and would find it difficult to serve the occupants of another 100 dwellings.
2. By road, Writtle Surgery is 4.5 KM (2.8 miles) from SGS18a, and Little Waltham Surgery is over 6 KM (3.8 miles) away. Neither are within reasonable walking distances.
3. The proposed development would NOT contribute to the provision of open space and/or health facilities. Farmland with footpath access, would be lost to this new housing.
4. The residents of Broomwood Manor (not Lodge) manage a CIC Wilder Spaces project which hosts SEND and autistic children from the local Hawthorn school every week, to enable them to enjoy the quiet, secure, private setting of the meadow and wood. It offers them a unique local environment customised to their needs and designed in partnership with the school. The children can explore, discover and learn about wildlife, in the natural meadow and woodland setting in a way most appropriate for their specific needs and welfare requirements. The quiet, safe and natural setting so close to the school (5 mins drive) is invaluable to them and enables an appropriate learning experience negating issues around reactive interaction with the general public, unsecure boundaries, noise and related sensory issues that can be very disruptive and impact negatively on the children's welfare and enjoyment of such settings.
5. The development would be within 100m of Broomwood Manor. 100 new dwellings would have a significant impact on this provision, especially during the construction period.

Objective 6 – Transport

The 'Mixed' effect is not justified. The evidence below indicates a more appropriate assessment would be a 'Significant Negative Effect'. Based on evidence from annual traffic counts carried out by Essex Highways, the Parish Council has on several occasions raised concerns about the detrimental environmental and social impact of increased numbers of vehicles at peak times using Chignal Road, specifically in our opposition to proposals for growth in north and west Chelmsford in the Local Plan and in comments on the change of priority at the proposed new Hollow Lane junction with Chignal Road.

1. The site would be more than 400m from all services. The closest bus stop being over 400m away from most of the site.
2. The nearest railway station, Chelmsford, is 4.8 KM (3 miles) away by road. The nearest Park & Ride, Chelmer Valley, Little Waltham is 7 KM (4.4 miles) from SGS18a.
3. The Parish Council has consistently challenged the priority given to Hollow Lane traffic at the junction with Chignal Road given the year-on-year increases in traffic volume on Chignal Road. In addition, the junction is narrow and causes larger vehicles turning left towards Chignal Smealey to drive onto the oncoming stream of traffic. The Parish Council requested a 7-day speed/volume traffic survey at this junction, the results of which should be available by the end of January 2026. This is expected to demonstrate that traffic volumes are continuing to increase on Chignal Road. The additional traffic generated by 100 houses entering Chignal Road close to the already inadequate junction with Hollow Lane would result in unacceptable congestion and road safety issues on this narrow rural road.
4. If development of SGS18a is approved in the Local Plan, the Parish Council would suggest improving the Chignal Road/Hollow Lane junction by, for example, creating a roundabout and extending the existing 40 mph speed limit north on Chignal Road towards Chignal Smealey.
5. The site entrance to SGS 18a is inappropriate as it adjoins the entrance to Broomwood Manor. It is also very close to the entrance to Kilnfield Barns and to the poorly designed junction of Chignal Road/Hollow Lane. In peak times significant congestion occurs at this junction and would have a detrimental effect on the existing residents.

Objective 13 – Cultural Heritage

The 'Neutral' effect rating for this objective is disputed having regard to the proximity of Listed Buildings (Chobbings Farmhouse Grade II*; Granary Chobbings Grade II; and Chopyns Barn Grade II) and non-designated heritage assets (Broomwood Manor and Nos 3 and 4 Kilnfield Barns). Recent planning decisions provide evidence that a 'Significant Negative Effect' would be more appropriate.

1. The Listed Buildings and Non-Designated Heritage Assets are sited within a Rural Area. The construction of 100 new dwelling on the fields proposed would attach these assets to the Urban Area and remove the green space between them. A location within a countryside environment would be lost.
2. The intrinsic character and beauty of the countryside, as viewed from the existing Urban Area (Little Hollows), would be lost. Hollow Lane forms a natural boundary to the Urban Area and should be retained as such.
3. Kilnfield Barns is provided with open space/amenity areas, including a pond, which would overlook the proposed site. The nearest existing properties off Hollow Lane are approximately 200m away, the new build proposed dwellings would be within 125m.
4. For Broomwood Manor the nearest existing properties off Hollow Lane are approximately 300m away, the new build proposed dwellings would be within 80m.

5. The Chignal Villages Design Statement (CVDS) includes guidance on development in the area around Beaumont Otes, now Kilnfield Barns. It confirms that period farm buildings are an integral part of the Chignals' strong agricultural identity. The refurbishment and re-building of the barns on Beaumont Otes followed this design guidance, CVDS and the Local Plan, to preserve the intrinsic character and beauty of the Rural Area.

6. The development of 100 new dwellings on agricultural land would be contrary to this design guidance and would have an adverse impact on the existing rural heritage character of this area.

Objective 14 – Landscape and Townscape

The RAG assessment of 'Neutral' for this objective is disputed. There is clear evidence that the "development may have an adverse effect on landscape/townscape character". A more appropriate rating would be 'Significant Negative Effect'.

The parish sits within the Pleshey Farmland Plateau Chelmsford Character Landscape which has a 'strong sense of tranquillity' as a key characteristic. 'The views within the area vary from open views over the arable farmland on the highest land to the enclosed views in the valleys in the south of the area'. Any new development in this character landscape area should be small-scale, responding to the historic settlement pattern, landscape setting and locally distinctive building styles. The development of 100 houses proposed at SGS 18a will not be small scale nor will it respond to the historic settlement pattern of scattered farmsteads and open fields and woods. The landscape setting of the adjacent historic former agricultural buildings will be damaged permanently by the imposition of a modern housing estate. The mental health benefits of the relaxation and tranquillity experienced by urban dwellers who use the footpath that runs through SGS 18a to access the wider countryside in Chignal and Broomfield parishes will also be lost if the development is approved.

(See attachment 308535ASASIIA-A.docx for full text of representation beyond the IIA).

Attachment/s	308535ASASIIA-A.docx
	308535ASASIIA-B.docx

ID	ASIIA-22
Person ID	873301
Family Name	
Company / Organisation	Cliffords Group Ltd
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Sections 2.3 and 3
Question 1	No
Question 2 - Please provide an explanation below:	<p>Please refer to accompanying representations. (Land at Drakes Farm, Little Waltham, Chelmsford)</p> <p>A reassessment undertaken in August 2025 identified that Chelmsford can no longer demonstrate a five-year housing land supply, largely due to stalled strategic sites and the cancellation of the A12 widening scheme. This position arose shortly after publication of the Regulation 19 DLP, highlighting the need for greater flexibility within the Plan to respond to changing circumstances and to maintain adequate housing and employment land supply throughout the plan period. The allocation of additional sites, particularly in sustainable and well-connected locations such as North Chelmsford, should therefore be supported.</p> <p>To ensure the DLP is effective and consistent with national policy, it should seek to maximise the allocation of suitable and sustainable sites. While the DLP is not required to be prepared in accordance with the 2024 NPPF, current national policy establishes a minimum housing requirement of 1,473 dwellings per annum. The omission of deliverable and sustainable sites in North Chelmsford, including Land at Drakes Farm, undermines the Plan's ability to meet this requirement and calls into question its soundness. With modest modifications, including the allocation of this Site, the DLP could be strengthened to deliver much-needed homes in a sustainable and coordinated manner.</p> <p>Additional Sites Assessment Process</p> <p>The SEA Regulations require that an Environmental Report is prepared for plans such as the emerging Local Plan. In this instance, the Integrated Impact Assessment of the Regulation 19 Addendum ('the IIA') seeks to fulfil this requirement.</p> <p>Paragraph 32 of the NPPF further confirms that a sustainability appraisal meeting the requirements of the SEA Regulations should inform Local Plans throughout their preparation and demonstrate how economic, social and environmental objectives have been addressed. The IIA is therefore fundamental to both the legal compliance and the soundness of the DLP.</p> <p>The SEA Regulations require the Environmental Report to identify, describe and evaluate the likely significant environmental effects of proposed options and reasonable alternatives (Regulation 12(2)), and to explain the reasons for selecting preferred options and rejecting others (Regulation 16).</p> <p>In this context, the Council's Strategic Housing and Employment Land Availability Assessment Autumn 2025 ('the SHELAA') is particularly relevant, as it provides an objective assessment of sites' suitability, availability and achievability for residential development.</p> <p>dThe Site subject to this representation, Land at Drakes Farm, was assessed by the Council and assigned an overall 'amber' rating. This outcome reflects a number of site-specific factors, including the Site's location within a Minerals and Waste Consultation Area, its predominantly greenfield status with agricultural land classified as Grades 1–3, the presence of protected natural features in the form of Tree Preservation Order (TPO) trees, neighbouring land-use constraints, and its distance from certain key services. However, as demonstrated through the promotion of the Site and previous representations, these matters are not insurmountable and can be appropriately addressed through a carefully designed masterplan. In particular, mineral safeguarding does not preclude development in principle and can be managed through consultation and phased delivery; the presence of TPO trees can be accommodated through retention, buffers and sensitive layout; and neighbouring constraints can be mitigated through appropriate separation distances and design responses. In respect of agricultural land, some release of higher-grade land is unavoidable if the District's housing needs are to be met. Furthermore, opportunities exist to enhance pedestrian and cycle connectivity and to integrate the Site with the wider urban area, reducing reliance on private car use. The assessment therefore does not adequately recognise the role of good design, mitigation and connectivity improvements in addressing these constraints, nor the Site's potential to deliver sustainable development as part of planned growth at North Chelmsford.</p> <p>IIA</p> <p>The IIA appraises two options. Option 1 comprises the Regulation 19 allocations, increased site capacities and the allocation of additional small sites. Option 2 includes the Regulation 19 allocations alongside one or more additional strategic sites.</p>

	<p>The IIA assesses the Regulation 19 allocations in combination with the sites identified under each option. Option 1 is identified as the preferred approach on the basis that it aligns with the Local Plan's Strategic Priorities, Vision and Spatial Principles, accords with the settlement hierarchy, performs well in relation to housing delivery, the economy and employment, makes effective use of existing and proposed infrastructure capacity, includes employment sites, and is anticipated to be deliverable within the first five years of the Plan period.</p> <p>Option 2 is rejected on the basis that it is said to diverge from the Plan's Strategic Priorities and Spatial Principles, perform less well in relation to the economy, sustainable living, health and wellbeing and transport, rely on unproven infrastructure requirements, and raise concerns regarding delivery within the first five years due to its scale.</p> <p>There are, however, a number of concerns with these conclusions and the justification for selecting Option 1. In particular, Option 1 appears to apply broad conclusions to a diverse group of sites with differing characteristics, locations and relationships to existing settlements.</p> <p>Strategic Policy S1 identifies a number of relevant spatial principles, including locating development in well-connected and sustainable locations, focusing growth at higher-order settlements, ensuring appropriate infrastructure provision, and supporting regeneration. North Chelmsford is clearly identified as a sustainable location capable of accommodating additional growth, and it is therefore inconsistent that certain deliverable sites within this area, including Land at Drakes Farm, have not been included within the preferred allocation approach.</p> <p>The assertion that smaller sites are inherently more appropriate within the settlement hierarchy is not supported by the evidence. Option 1 includes sites in less sustainable locations or with lower SHELAA scores than other available sites in North Chelmsford, including Land at Drakes Farm, which would represent a logical and sustainable extension to the urban area.</p> <p>Notably, Land at Drakes Farm does not appear to have been included within either Option 1 or Option 2, excluding it from consideration through this additional site assessment process despite its clear alignment with the Plan's strategic objectives.</p> <p>While the identification of additional sites demonstrates an attempt to address land supply, the failure to capture sustainable growth opportunities in North Chelmsford within the preferred allocation approach undermines the effectiveness of the DLP and raises concerns regarding its positive preparation and justification.</p> <p>Summary</p> <p>In summary, while the principle of accommodating additional growth through the DLP Addendum is supported, the approach taken has failed to capture all sustainable and deliverable opportunities within North Chelmsford. Land at Drakes Farm represents a suitable, well-located and deliverable site that aligns with the Local Plan's Strategic Priorities and Spatial Principles and should be included within the preferred allocation approach. Without such modifications, the DLP cannot be considered positively prepared, justified or fully consistent with national policy.)</p>
Question 3	Please refer to accompanying representations.
Question 4 - Executive Summary	<p>This representation, prepared by Ceres Property LLP on behalf of Cliffords Group Ltd, concerns land at Drakes Farm, North Chelmsford, and responds to the Regulation 19 Pre-Submission Addendum to the emerging Chelmsford Local Plan Review. It supports the principle of introducing additional allocations to address identified delivery shortfalls but raises concern that the approach taken fails to fully capture sustainable and deliverable opportunities in North Chelmsford.</p> <p>Land at Drakes Farm has previously been assessed through the Council's SHELAA and found suitable in principle for development. Constraints relating to minerals safeguarding, landscape, and neighbouring uses can be appropriately mitigated through design and phasing, while the site's location offers strong accessibility and connectivity benefits. Its allocation would therefore strengthen the Plan's ability to meet housing and employment needs in accordance with the NPPF's sustainable development objectives.</p> <p>The representation questions the Integrated Impact Assessment's rationale for preferring Option 1, highlighting inconsistencies with Strategic Policy S1 and the settlement hierarchy. The omission of Drakes Farm from either option undermines the positive preparation, justification, and effectiveness of the Draft Local Plan. Inclusion of the site would provide a logical, sustainable, and deliverable extension to North Chelmsford, improving the Plan's flexibility and alignment with national policy.</p>
Attachment/s	Drakes Farm - Reg 19 Addendum.pdf
ID	ASIIA-24
Person ID	873301
Family Name	
Company / Organisation	Cliffords Group Ltd
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Sections 2.3 and 3

Question 1	No
Question 2 - Please provide an explanation below:	<p>Please refer to accompanying representation.</p> <p>(Land South of Wheelers Hill, Little Waltham, Chelmsford)</p> <p>The DLP Addendum identifies additional residential and employment sites in response to delays and delivery shortfalls associated with previously allocated locations. The inclusion of further sites represents a pragmatic response and demonstrates an acknowledgement that greater flexibility is required to ensure the Plan remains effective and deliverable.</p> <p>A reassessment undertaken in August 2025 confirmed that Chelmsford can no longer demonstrate a five-year housing land supply, primarily as a result of stalled strategic sites and the cancellation of the A12 widening scheme. This position emerged shortly after publication of the Regulation 19 DLP and highlights the need for the Plan to be sufficiently adaptable to respond to changing circumstances and maintain an adequate supply of housing land throughout the plan period.</p> <p>In this context, the continued exclusion of sustainable sites located within the Green Wedge, without a robust and up-to-date review of that designation, undermines the Plan's ability to respond positively to identified housing needs. The allocation of additional sites should therefore include consideration of locations within the Green Wedge where development would not undermine its overall function or integrity.</p> <p>Additional Sites Assessment Process</p> <p>The SEA Regulations require that an Environmental Report is prepared for plans such as the emerging Local Plan. The Integrated Impact Assessment of the Regulation 19 Addendum ('the IIA') seeks to fulfil this requirement.</p> <p>Paragraph 32 of the NPPF confirms that a sustainability appraisal meeting the requirements of the SEA Regulations should inform Local Plans throughout their preparation and demonstrate how relevant economic, social and environmental objectives have been addressed. The IIA is therefore central to both the legal compliance and soundness of the DLP.</p> <p>The SEA Regulations require the Environmental Report to identify, describe and evaluate the likely significant effects of proposed options and reasonable alternatives (Regulation 12(2)), and to explain the reasons for selecting preferred options and rejecting others (Regulation 16).</p> <p>In considering reasonable alternatives, the Council's Strategic Housing and Employment Land Availability Assessment Autumn 2025 ('the SHELAA') is of particular relevance, as it assesses sites against criteria relating to suitability, availability and achievability for residential development.</p> <p>SHELAA Assessment</p> <p>The Site subject to this representation, land south of Wheelers Hill, was assessed by the Council and assigned an overall 'amber' rating. This outcome reflects a number of identified constraints, including the Site's location predominantly within the Green Wedge, its greenfield status with agricultural land classified as Grades 1–3, and its distance in excess of 400 metres walking distance from existing services and public transport provision.</p> <p>However, as demonstrated through the Site's promotion and previous representations, these factors do not preclude development in principle. A carefully considered and sensitively designed masterplan would be capable of delivering development that respects the function and purpose of the Green Wedge through appropriate landscape buffers, the retention and reinforcement of existing landscape features, and the maintenance of visual and physical separation between settlements. The Green Wedge designation is not intended to operate as an absolute constraint on development, and national policy does not preclude sustainable growth in such locations where potential impacts can be appropriately mitigated.</p> <p>In relation to accessibility, opportunities exist to enhance public transport provision and to improve pedestrian and cycle connectivity as part of a comprehensive development approach, thereby reducing reliance on the private car. In respect of agricultural land, some release of higher-grade land is unavoidable if the District's housing needs are to be met. The SHELAA assessment therefore does not adequately recognise the role of good design, mitigation and landscape-led development in addressing these matters, and places disproportionate weight on the Green Wedge designation in the absence of a detailed and up-to-date review.</p> <p>IIA Options and Site Selection</p> <p>The IIA considers two options for meeting housing needs. Option 1 focuses on increased capacities at existing allocations and the inclusion of additional small sites, while Option 2 comprises the allocation of one or more additional strategic sites.</p> <p>Option 1 is identified as the preferred approach, largely on the basis that it is considered to align with the Local Plan's Strategic Priorities and Spatial Principles and is capable of delivery within the first five years of the Plan period. Option 2 is rejected due to concerns regarding infrastructure provision, sustainability performance and deliverability.</p> <p>However, this binary approach fails to adequately consider reasonable alternatives within the Green Wedge that could make a positive contribution to housing delivery without undermining strategic objectives. Sites such as land south of Wheelers Hill have been excluded from consideration solely due to their designation, rather than on the basis of a balanced assessment of sustainability, deliverability and mitigation potential.</p> <p>The IIA applies broad conclusions to a diverse range of sites and does not sufficiently distinguish between locations within the Green Wedge that perform different functions or have differing sensitivities. This approach risks prematurely discounting sustainable and deliverable sites that could assist in addressing identified housing shortfalls.</p>

	<p>The continued reliance on the Green Wedge designation as a primary reason for site exclusion, without undertaking a comprehensive Green Wedge Review, raises concerns in respect of whether the DLP has been positively prepared and justified. National policy requires Local Plans to be sufficiently flexible to respond to changing circumstances and to make effective use of land to meet identified needs.</p> <p>By failing to consider sustainable development opportunities within the Green Wedge, including land south of Wheelers Hill, the Plan risks under-delivery and an over-reliance on a limited pool of sites, some of which have already demonstrated delivery challenges.</p> <p>Summary</p> <p>In summary, while the principle of identifying additional sites through the DLP Addendum is supported, the approach taken has continued to discount potentially sustainable and deliverable sites located within the Green Wedge without the benefit of a detailed review of that designation. Land south of Wheelers Hill represents a site that could accommodate development in a manner that respects the function and purpose of the Green Wedge through sensitive design and mitigation. In the absence of a comprehensive Green Wedge Review and a balanced assessment of reasonable alternatives, the DLP cannot be considered positively prepared, justified or fully consistent with national policy.</p>
Question 3	Please refer to accompanying representation.
Question 4 - Executive Summary	<p>This representation, prepared by Ceres Property LLP on behalf of Cliffords Group Ltd, relates to land south of Wheelers Hill, and responds to the Regulation 19 Pre-Submission Addendum to the emerging Chelmsford Local Plan Review. It supports the principle of identifying additional sites but raises significant concerns over the continued exclusion of sustainable Green Wedge locations without the benefit of a comprehensive review.</p> <p>Land south of Wheelers Hill was assessed through the SHELAA and found suitable in principle, with an 'amber' rating reflecting constraints that can be mitigated through landscape-led design, improved connectivity and sensitive masterplanning. The site is capable of delivering sustainable housing growth while maintaining the visual and physical separation between settlements that underpins Green Wedge policy objectives.</p> <p>Chelmsford's inability to demonstrate a five-year housing land supply underscores the need for greater flexibility within the Plan. However, the Integrated Impact Assessment and additional site selection process apply overly broad conclusions, excluding reasonable alternatives such as this site despite their potential to contribute to housing delivery. Without an up-to-date Green Wedge Review and reassessment of sustainable options, the Draft Local Plan cannot be regarded as positively prepared, justified or consistent with national policy.</p>
Attachment/s	Land south of Wheelers Hill - Reg 19 Addendum.docx.pdf

ID	ASIIA-23
Person ID	1330405
Company / Organisation	Cliffords Group Ltd, Mr Mark Peters
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Sections 2.3 and 3
Question 1	No
Question 2 - Please provide an explanation below:	<p>Please refer to accompanying representations. (Campions Farm, Broomfield, Chelmsford)</p> <p>The DLP Addendum identifies additional residential and employment allocations in response to delays and shortfalls associated with previously allocated sites. The inclusion of further sites represents a sensible and pragmatic response, supporting the preparation of an effective and policy-compliant Local Plan.</p> <p>A reassessment undertaken in August 2025 identified that Chelmsford can no longer demonstrate a five-year housing land supply, largely due to stalled strategic sites and the cancellation of the A12 widening scheme. This position arose shortly after publication of the Regulation 19 DLP, highlighting the need for increased flexibility to respond to changing circumstances and maintain adequate housing and employment land supply throughout the plan period. The allocation of additional sites should therefore be considered to address this shortfall.</p> <p>To ensure the DLP is effective and consistent with national policy, it should seek to maximise the allocation of suitable and sustainable sites. Although the DLP is not required to be prepared in accordance with the 2024 NPPF, current national policy establishes a minimum housing requirement of 1,473 dwellings per annum. The continued omission of land at Margaretting—a clearly sustainable and deliverable site—means the DLP cannot currently be found sound. However, modest modifications, including the allocation of this site for approximately 75 dwellings, would materially improve the Plan's effectiveness and housing delivery.</p> <p>Additional Sites Assessment Process</p> <p>The SEA Regulations require that an Environmental Report is prepared for plans such as the emerging Local Plan. In this instance, the Integrated Impact Assessment of the Regulation 19 Addendum ('the IIA') seeks to fulfil this requirement.</p> <p>Paragraph 32 of the NPPF further confirms that a sustainability appraisal meeting the SEA Regulations should inform Local Plans throughout their preparation and demonstrate how economic, social and environmental objectives have been addressed. The IIA is therefore central to both the legal compliance and soundness of the DLP.</p> <p>The SEA Regulations require the Environmental Report to identify, describe and evaluate the likely significant environmental effects of proposed options and reasonable alternatives (Regulation 12(2)), and to explain the reasons for selecting preferred options and rejecting others (Regulation 16).</p> <p>In this context, the Council's Strategic Housing and Employment Land Availability Assessment Autumn 2025 ('the SHELAA') is particularly relevant, as it provides an objective assessment of sites' suitability, availability and achievability for residential development, using a 'RAG' rating system.</p> <p>The Site subject to this representation was assessed under reference CFS212 and assigned an overall 'amber' rating. This reflects, in part, a score of zero in relation to public rights of way and cycle connectivity, together with identified constraints associated with archaeological assets, Green Wedge designation, agricultural land classification and protected natural features. However, as demonstrated through the Site's promotion and previous representations, a carefully designed masterplan would be capable of delivering high-quality active travel connections and appropriate buffers to safeguard archaeological assets and the Local Wildlife Site within the wider landholding. In respect of agricultural land classification, some release of such land is unavoidable if the District's housing needs are to be met. The assessment therefore does not sufficiently recognise the role of design and mitigation in addressing these matters.</p> <p>IIA</p> <p>The IIA appraises two options. Option 1 comprises the Regulation 19 allocations, increased site capacities and additional small sites. Option 2 includes the Regulation 19 allocations alongside one or more additional strategic sites.</p> <p>The IIA assesses the Regulation 19 allocations in combination with the sites identified under each option. Option 1 is identified as the preferred approach on the basis that it aligns with the Local Plan's Strategic Priorities, Vision and Spatial Principles, accords with the settlement hierarchy, performs well in relation to housing delivery, the economy and employment, makes efficient use of existing and proposed infrastructure, includes employment sites, and is considered deliverable within the first five years of the Plan.</p>

	<p>Option 2 is rejected on the basis that it is said to diverge from the Plan's Strategic Priorities and Spatial Principles, perform less well in relation to the economy, sustainable living, health and wellbeing and transport, rely on unproven infrastructure requirements, and raise concerns regarding delivery within the first five years due to its scale.</p> <p>There are a number of concerns with these conclusions and the justification for selecting Option 1. In particular, Option 1 appears to treat all sites as being of equal sustainability, applying generic conclusions to a group of sites with varying characteristics, locations and settlement contexts.</p> <p>Strategic Policy S1 identifies a number of relevant spatial principles, including locating development in well-connected and sustainable locations, focusing growth at higher-order settlements, ensuring infrastructure provision, and supporting regeneration. It is evident that some Option 1 sites contribute less effectively to these objectives than others, while certain sites included within Option 2 perform more strongly. In this regard, the Landowners reiterate their previous representations seeking amendments to Strategic Policy S1 to direct development to all higher-order settlements, rather than only those outside the Green Wedge.</p> <p>The assertion that smaller sites are inherently more consistent with the settlement hierarchy is not supported by the evidence. Option 1 includes sites in less sustainable locations or with lower SHELAA scores than sites discounted under Option 2, including those dismissed solely due to their Green Wedge designation.</p> <p>Campions Farm does not appear to have been included within either option, excluding it from consideration through this additional site assessment process.</p> <p>While the identification of additional sites demonstrates an attempt to address land supply, it does not resolve the underlying soundness concerns arising from the absence of any review of the Green Wedge or the failure to consider growth opportunities at sustainable settlements within it. As such, the process cannot be regarded as positively prepared or justified, nor does it reflect national policy support for the sustainable growth of rural settlements.</p> <p>Summary</p> <p>In summary, the additional site allocation process has prematurely discounted sustainable development options solely on the basis of Green Wedge designation. In the absence of a comprehensive Green Wedge Review, this approach to meeting increased housing needs cannot be considered positively prepared, justified, or consistent with national policy.)</p>
Question 3	Please refer to accompanying representations.
Question 4 - Executive Summary	<p>Here's a 200-word executive summary of your representation, written in a professional, submission-ready planning style.</p> <p>Executive Summary</p> <p>This representation, prepared by Ceres Property LLP on behalf of Cliffords Group Ltd and Mr Mark Peters, relates to land at Campions Farm, Broomfield, and responds to the Regulation 19 Pre-Submission Addendum to the emerging Chelmsford Local Plan Review. It supports the principle of identifying additional sites but raises concern that the Council's approach has unjustifiably excluded sustainable Green Wedge locations such as Campions Farm.</p> <p>The representation notes that Chelmsford can no longer demonstrate a five-year housing land supply following delays to strategic sites and cancellation of the A12 widening scheme. Additional allocations are therefore essential to maintain delivery and ensure the Plan's effectiveness. Campions Farm was assessed through the SHELAA (CFS212) and found suitable in principle, with constraints capable of being mitigated through sensitive design, connectivity enhancements and environmental safeguards. Its omission limits the Plan's ability to meet identified housing and sustainability objectives.</p> <p>Concerns are also raised regarding the Integrated Impact Assessment, which applies broad assumptions across sites and fails to scrutinise the relative sustainability of Green Wedge options. Without reviewing this designation and considering appropriate releases, the Draft Local Plan cannot be regarded as positively prepared, justified or consistent with national policy.</p>
Attachment/s	Campion Farm - Reg 19 Addendum.docx.pdf

ID	ASIIA-39
Person ID	1397935
Company / Organisation	Crest Nicholson
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Options in the IIA
Question 2 - Please provide an explanation below:	<p>The IIA identifies two options for appraisal: Option 1 entails allocation of the sites proposed at the Regulation 19 iteration of the emerging Local Plan, but increasing capacities, and additional allocation of small sites. Option 2 comprises allocation of the same sites proposed in the Regulation 19 emerging Local Plan, plus allocation of an additional strategic site or sites.</p> <p>3.7 One matter that has been identified in relation to the IIA is that it has grouped various large sites together but failed to consider sites within these groupings that could come forward independently. The problematic nature of this approach is evident when considering that the reasons for rejection of Option 2 include infrastructure requirements being unproven and the inability for these sites to be relied upon in the first five years of the Plan. However, if these grouped sites were separated, the individual sites, whilst still relatively large could nevertheless contribute to housing within the first five years from adoption of the Plan and which do not require significant infrastructure upgrades that could otherwise be seen as a potential barrier to delivery.</p> <p>3.8 These matters appear to largely stem from the way that sites have been grouped before being assessed. A more effective approach, that would ensure a robust appraisal of reasonable alternatives, would be to undertake a comparative appraisal of the various potential sites against the sustainability objectives. This may well identify that a mix of sites, including some that are currently within Option 1 as well as those within Option 2, represents a sustainable and justified approach.</p> <p>3.9 In such an appraisal, it would be important to assess the larger sites as both standalone sites (where this is deliverable, as is the case with the Site (Warren Farm Phase 2)) and, separately, as part of a larger strategic growth in combination with other sites (again, where a such a strategic approach is deliverable).</p> <p>3.10 The judgment in Cogent makes clear that the Strategic Environmental Assessment (in this case named the IIA) is an iterative process, and defects in earlier stages can be resolved at the later stage (even at very late stage in the process). The issues identified in the IIA can thus be revisited in terms of the appraisal of alternatives in order to negate potential issues in respect of compliance with the Strategic Environmental Assessment Regulations, as well as ensure the emerging Local Plan is justified and consistent with national policy.</p>

ID	ASIIA-30
Person ID	1390564
Family Name	
Company / Organisation	Croudace Homes
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	2.3.2
Question 1	No
Question 2 - Please provide an explanation below:	<p>INCONSISTENT WITH THE FOCUSED CONSULTATION DOCUMENT IN REGARDS TO HOUSING LAND SUPPLY</p> <p>The Five Year Housing Land Supply position is addressed in both the Focused Consultation document and the Integrated Impact Assessment (IIA, wsp, November 2025). Paragraph 1.15 of the Focused Consultation document states that 'without the additional sites, it is currently estimated that there will only be 4.93 years of housing land supply (8,010/1,622) on submission.' This is used as the baseline position above which the additional sites increase the housing land supply to 5.75 years set out at paragraph 1.16.</p> <p>However, there appears to be some inconsistency as to the correct housing land supply position. Both paragraph 2.3.1 of the IIA, and paragraph 1.4 of the Focused Consultation document identify the same significant events which have taken place, which have led to the need for the Further Focused Consultation on Additional Sites.</p> <p>These changes include:</p> <ul style="list-style-type: none"> • The withdrawal of Government funding for the A12 DCO; • Delay to the delivery of three strategic sites identified in the Pre-Submission Local Plan; • Re-assessment and re-profiling of the Council's housing land supply, and • The need to meet the Government's housing target in full as the adopted Local Plan became more than five years old on 27 May 2025. <p>The Focused Consultation document identifies that there will be a 4.93 year housing land supply on submission of the Plan without the additional sites. However, paragraph 2.3.2 of the IIA states that, taking account of the above events, and without the additional sites, there is only a projected 3.88 years of housing supply.</p> <p>The identification of 11 additional sites and three expanded housing sites has increased the five year housing land supply by 1,297 units, or 1,592 units over the plan period, enabling the Council to demonstrate a 5.75 year supply on submission. However, this projection is based on the Council's assertion that it would have a 4.93 year supply on submission without these sites. This is where the conflict lies s it is clear from the IIA that the extant supply is as low as 3.88 years.</p>
Question 3	
Question 4 - Executive Summary	

ID	ASIIA-49
Person ID	1326599
Family Name	
Company / Organisation	Dandara
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	General comment
Question 2 - Please provide an explanation below:	<p>Dandara's response supports the expanded allocation of Growth Site 14b for the development of around 75 dwellings and a new off-road parking area for Ford End Primary School, which lies directly adjacent, and delivery of a new community/village hall.</p> <p>Dandara has remaining concerns about the soundness of the Plan in respect of the measures taken to ensure that the housing requirement is met in full across the Plan period, and the significant risks associated with the delivery of a new settlement at Hammonds Farm. These concerns reaffirm the importance of ensuring the opportunities presented on easily deliverable small sites, such as Growth Site 14b.</p> <p>Strategic Policy S7 – The Spatial Strategy</p> <p>2.30 Whilst Dandara supports the broad thrust of Strategic Policy S7's approach, it objects to the justification for a new settlement to the East of Chelmsford, taking account of the reasonable alternatives. These include the allocation of further urban extensions on the edge of the urban area.</p> <p>2.31 Dandara's concerns are exacerbated by the reliance of the Spatial Strategy on Junction 19 of the A12. This is a significant deliverability risk, due to the Government's decision to cancel planned improvements to the A12 that would have delivered required capacity. The Local Plan's traffic modelling concludes that the full improvements that were proposed to Junction 19 are required as a minimum to deliver the strategic growth expected by the Local Plan. Whilst discussions are on-going with National Highways to look at options for a phased approach to works to the junction to support the proposed Local Plan growth, but no outcome has yet been reached.</p> <p>2.32 Furthermore, the evidence base supporting the draft Plan has not been sufficiently updated to justify the decision to allocate Hammonds Farm in favour of other options that are better connected to existing services. The Integrated Impact Assessment (IID) supporting the previous Regulation 19 consultation did not assess the potential benefits of further allocations north of South Woodham Ferrers, nor of smaller sites adjacent to existing higher order settlements. It stated simply at 6.4.41 that:</p> <p>"It was not considered appropriate to try to meet the remaining residual needs through a selection of additional small sites.</p>

Over 90 small sites were submitted for consideration for development. More than half have been discounted because they are in the Green Belt or Green Wedge. Many other sites are unsuitable for a number of reasons, such as due to not meeting other Local Plan policies on a wide range of issues, being in an unsustainable location, being distant from defined settlements, or other factors including topology. A number of smaller site allocations are allocated but attempting to meet residual needs would not be feasible due to the lack of site supply. Even if this could be accommodated, it would not be a balanced strategy. While the smaller sites could potentially deliver faster than the large scale sites, they would not deliver the same benefits in terms of new or improvements to existing community services and facilities. Some of the smaller sites being allocated form part of a larger promoted area, where a larger allocation may not be appropriate for the settlement due to issues such as access, surrounding density and character, along with not helping the Council to meet the 10% small sites target.”

2.33 The update to IID supporting the Additional Sites consultation does not do so either. It only assesses the option of allocating a single strategic site or sites) as a reasonable alternative. It does not assess the potential benefits of alternative smaller sites or of allocating further smaller sites to boost housing supply further. It must do so before the Plan can be found sound. (Complete representation attached - 1326599AS-C)

Attachment/s	1326599AS-C.pdf
ID	ASIIA-50
Person ID	1326599
Family Name	
Company / Organisation	Dandara
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	General comment
Question 2 - Please provide an explanation below:	<p>These representations have been prepared on behalf of Dandara to support of the promotion of Land at North-West Chelmsford (SHLAA reference: CFS182). They respond the Focused Additional Sites Pre-Submission (Regulation 19) consultation on the draft replacement Chelmsford Local Plan and supplement representations made to the previous Regulation 19 consultation in March 2025.</p> <p>Our response supports the proposed allocation of Strategic Growth Site 18a at North West Chelmsford (land north of Hollow Lane) for around 100 dwellings. Dandara controls this land and confirms that it is available, suitable and deliverable as anticipated by Strategic Growth Site Policy 18a. It is submitting supporting information alongside these representations to help verify this position, including a newly prepared masterplan and Vision Document copied at Appendix 1 (See attachment - 1326599AS-A).</p> <p>Dandara is continuing to highlight the opportunity presented by its wider holding at North West Chelmsford, which could deliver up to 850 dwellings in total. Allocating the land in full would boost housing land supply on an easily deliverable and sustainable site and enhance the resilience of the Plan. Taking account of the risks associated with the wider spatial strategy adopted by the Council and our concerns about the soundness of policy S6 and S7, we believe this is a necessary amendment.</p> <p>Whilst Dandara welcomes the measures taken by the Council since the main Regulation 19 consultation to enhance its five-year housing land supply position, including the proposed allocation of its land north of Hollow Lane, it has remaining concerns about the soundness of the Plan in respect of:</p> <ul style="list-style-type: none"> • Insufficient housing supply allocations to ensure that the Plan’s housing requirement is met in full, taking account of the limited buffer proposed.

- Over optimistic assumptions about the likely delivery timeframes for the draft Plan's main allocation - the 3,000 new homes expected to come forward at Hammonds Farm.
- Significant risks associated with the delivery of a new settlement at Hammonds Farm, including the substantial upfront highways and other infrastructure required to enable the development to come forward and the risks presented by the Government's decision to cancel planned A12 upgrades.
- The justification for the allocation of a new settlement east of Chelmsford compared with the reasonable alternatives, including further allocations to the west and north-west of Chelmsford.

Strategic Policy S7 – The Spatial Strategy

2.28 Whilst Dandara supports the broad thrust of Strategic Policy S7's approach, including its recognition of the roles of Chelmsford and South Woodham Ferrers at the top of the Settlement Hierarchy and the main areas of focus for growth in the Local Plan, it maintains an objection to the justification for a new settlement to the East of Chelmsford, taking account of the reasonable alternatives. These include the allocation of further urban extensions on the edge of the urban area, including at North-West Chelmsford. We refer the Council and the Inspector to objections made to the previous Regulation 19 consultation, which remain valid.

2.29 Dandara's concerns are exacerbated by the reliance of the Spatial Strategy on Junction 19 of the A12. This is a significant deliverability risk, due to the Government's decision to cancel planned improvements to the A12 that would have delivered required capacity. The Local Plan's traffic modelling concludes that the full improvements that were proposed to Junction 19 are required as a minimum to deliver the strategic growth expected by the Local Plan. Whilst discussions are on-going with National Highways to look at options for a phased approach to works to the junction to support the proposed Local Plan growth, but no outcome has yet been reached.

2.30 Furthermore, the evidence base supporting the draft Plan has not been sufficiently updated to justify the decision to allocate Hammonds Farm in favour of other options west of Chelmsford that are better connected to existing services. The Integrated Impact Assessment supporting the previous Regulation 19 consultation suggested that housing growth at West Chelmsford was only considered in one of the six spatial strategy options tested. This was Option 2(c), where 3,000 dwellings would have been delivered at West and North-West Chelmsford (21SHELAA41; CFS165; CFS182 (Part); CFS82; CFS80; 21SHELAA100; 21SHELAA17; CFS183), including on Dandara's land. It suggests that this option was rejected because:

“Although adjacent to the Chelmsford Urban Area, the sites at West and North-West Chelmsford have poorer connectivity into the urban area of Chelmsford, and as such they are relatively isolated from the strategic highway network. There are less opportunities create sustainable routes to existing public transport or provide new Bus Based Rapid Transit infrastructure.

The sites that comprise the West and North-West Chelmsford site option are under multiple ownerships, which may delay delivery and result in piecemeal development
Employment opportunities would be less accessible to the wider population (for example through public transport).” Para 6.4.51

2.31 Dandara continues to dispute these findings, for the following reasons:

The sites cannot be considered to have poorer connectivity to the Chelmsford's urban area. Not only are they more proximate to it, enabling genuine opportunities to walk or cycle to Chelmsford City Centre and access other services and facilities in its urban area, they are located directly adjacent to existing public transport routes and other infrastructure. This position is supported the Council's own Sustainable Accessibility Mapping and Appraisal evidence base document 2022 (document T003), which scored eight potential development locations. The Edge of Chelmsford extension (which included West Chelmsford and East Chelmsford) scored fourth best. Only the brownfield development options in the urban area, North-East Chelmsford and South Woodham Ferrers scored better. Location 8, the Hammonds Farm option, scored second worst.

The ownership structure of the sites at West and North-West Chelmsford will not significantly impinge upon their delivery timeframes or risk piecemeal development. Dandara alone controls 81 hectares of land at North-West Chelmsford that can deliver a sustainable new neighbourhood of around 850 new homes. It could come forward in isolation, or as part of a wider allocation to include land to the south and south-west controlled by Taylor Wimpey and Crest Nicholson.

All three developers are collaborating on the promotion of these sites, demonstrated by the submission of joint representations at the previous Regulation 19 stage (under separate cover), but none of the parcels are reliant on each other for delivery. Concerns about multiple land ownerships should not be a reason to discount growth at West and North-West Chelmsford. Indeed, we would urge the Council to see the positives of this situation, given the likelihood of quicker delivery from multiple outlets offering diversity of product.

The main employment opportunity proposed at Hammonds Farm is the separate employment site 16b, located adjacent to junction 18 of the A12. This could come forward without the wider residential-led allocation. In any case, whilst this location is accessible from the A12, it is poorly connected the population of Chelmsford's urban area by anything other than car-based transport.

2.32 The Council and the Inspector must consider the benefits of development at West and North-West Chelmsford more thoroughly before the Plan can be found sound. It should re-appraise the conclusions drawn in the Integrated Impact Assessment at the Regulation 19 stage and consider each of the development opportunities promoted independently by Dandara, Taylor Wimpey and Crest Nicholson, in addition to the cumulative opportunity they represent due to each party's willingness to collaborate.

(Complete representation attached - 1326599AS-A)

Attachment/s	1326599AS-A.pdf
ID	ASIIA-51

Person ID	1326599
Family Name	
Company / Organisation	Dandara
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	General comment
Question 2 - Please provide an explanation below:	<p>These representations have been prepared on behalf of Dandara to support of the promotion of Land West of Willow Grove, South Woodham Ferrers (SHLAA reference: 20SHELAA3/21SHELAA3). They respond the Focused Additional Sites Pre-Submission (Regulation 19) consultation on the draft replacement Chelmsford Local Plan and supplement representations made to the previous Regulation 19 consultation in March 2025.</p> <p>1.2 Whilst Dandara welcomes the measures taken by the Council since the previous Regulation 19 consultation to enhance its five-year housing land supply position, it has remaining concerns about the soundness of the Plan in respect of:</p> <p>Insufficient housing supply allocations to ensure that the housing requirement is met in full, taking account of the limited buffer proposed.</p> <p>Over optimistic assumptions about the likely delivery timeframes for the draft Plan's main allocation - the 3,000 new homes expected to come forward at Hammonds Farm.</p> <p>Significant risks associated with the delivery of a new settlement at Hammonds Farm, including the substantial upfront highways and other infrastructure required to enable the development to come forward and the risks presented by the Government's decision to cancel planned A12 upgrades.</p> <p>The justification for the allocation of a new settlement east of Chelmsford compared with the reasonable alternatives, including further allocations on the edge of Chelmsford and South Woodham Ferrers urban area.</p> <p>Strategic Policy S7 – The Spatial Strategy</p> <p>2.20 Whilst Dandara supports the broad thrust of Strategic Policy S7's approach, including its recognition of the roles of Chelmsford and South Woodham Ferrers at the top of the Settlement Hierarchy and the main areas of focus for growth in the Local Plan, it maintains an objection to the justification for a new settlement to the East of Chelmsford, taking account of the reasonable alternatives. These include the allocation of further urban extensions on the edge of the urban area. We refer the Council and the Inspector to objections made to the previous Regulation 19 consultation, which remain valid.</p> <p>Dandara's concerns are exacerbated by the reliance of the Spatial Strategy on Junction 19 of the A12. This is a significant deliverability risk, due to the Government's decision to cancel planned improvements to the A12 that would have delivered required capacity. The Local Plan's traffic modelling concludes that the full improvements that were proposed to Junction 19 are required</p>

as a minimum to deliver the strategic growth expected by the Local Plan. Whilst discussions are on-going with National Highways to look at options for a phased approach to works to the junction to support the proposed Local Plan growth, but no outcome has yet been reached.

2.22 Furthermore, the evidence base supporting the draft Plan has not been sufficiently updated to justify the decision to allocate Hammonds Farm in favour of other options that are better connected to existing services. The Integrated Impact Assessment (IID) supporting the previous Regulation 19 consultation did not assess the potential benefits of further allocations north of South Woodham Ferrers, nor of smaller sites adjacent to existing higher order settlements. It stated simply at 6.4.41 that:

“It was not considered appropriate to try to meet the remaining residual needs through a selection of additional small sites.

Over 90 small sites were submitted for consideration for development. More than half have been discounted because they are in the Green Belt or Green Wedge. Many other sites are unsuitable for a number of reasons, such as due to not meeting other Local Plan policies on a wide range of issues, being in an unsustainable location, being distant from defined settlements, or other factors including topology.

A number of smaller site allocations are allocated but attempting to meet residual needs would not be feasible due to the lack of site supply. Even if this could be accommodated, it would not be a balanced strategy. While the smaller sites could potentially deliver faster than the large scale sites, they would not deliver the same benefits in terms of new or improvements to existing community services and facilities. Some of the smaller sites being allocated form part of a larger promoted area, where a larger allocation may not be appropriate for the settlement due to issues such as access, surrounding density and character, along with not helping the Council to meet the 10% small sites target.”

2.23 The update to IID supporting the Additional Sites consultation does not do so either. It only assesses the option of allocating a single strategic site or sites) as a reasonable alternative. It does not assess the potential benefits of alternative smaller sites or of allocating further smaller sites to boost housing supply further.

2.24 Dandara’s land west of Willow Grove does not therefore appear to have been properly considered, despite it having been assessed positively in every category (SHELAA site 20SHELAA3 and 21SHELAA4).

2.25 The Council and the Inspector must consider the benefits of development on the site further, as part of a wider assessment of reasonable alternatives, before the Plan can be found sound.

(Complete representation attached - 1326599AS-B)

Attachment/s

[1326599AS-B.pdf](#)

ID	ASIIA-2
Person ID	308802
Full Name	Mr Stewart Eade
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Chapter 2 Table 2.2,
Question 1	No
Question 2 - Please provide an explanation below:	<p>This site (19 - Land West of Patching Hall Lane) is not appropriate for a new residential estate for a number of factors including:</p> <ul style="list-style-type: none"> • Significant loss of quality of life to local residents with loss of privacy, loss of light/overshadowing, restricted/limited views, loss of property value, inconveniences associated with development/building site, and noise it will create over years. • Wildlife and environmental impact – This field is habited by local deer population, as well as foxes and numerous birds and insects. There will be loss of local trees and arable farming land. • Public footpath – this field is used daily for dog walking, leisure and commuting to school and work. • Well-being – this field is an important part of well-being for many local residents and animals/pets. • Green area/wedge between developments/estates – this field is an important separation between 3 housing estates, that prevents urban sprawl and housing areas and communities merging into one. The field provides a natural break between Broomfield and other settlements. Strategic Policy S7 of the Local Plan states that: “All development allocations will be located to ensure existing settlements maintain their distinctive character and to avoid coalescence between them.” • Vehicle congestion – Patching Hall Lane, and the junctions between Broomfield Road, Patching Hall Lane and School Lane are already very congested with the number of properties already within the locality. The local road network does not have capacity to accommodate additional vehicles, particularly with calming measures in place. This development will result in lorry and heavy load vehicle traffic over several years together with noise pollution. • Road safety – Patching Hall Lane is used by many school children walking and cycling to local schools (Saint John Payne, Chelmer Valley, Broomfield Primary, Columbus). An increase in vehicle numbers and traffic will increase risk to pedestrians and cyclists. • Flood risk and water drainage – The field provides an important water sink for surface water drainage in an area of high flood risk. Building on this field will increase risk of flooding to nearby properties, which is likely to get worse with current climate changes. Longstanding sewerage pipes pass under the field and serve existing local properties. • Infrastructure – Most local schools are already at capacity or over capacity, and are unable to accommodate further children. GP surgeries in the locality are already heavily subscribed with current residents already having difficulty getting an appointment in a reasonable time frame. There are limited buses serving the area <p>Protecting high grade agricultural land – The NPPF (National Planning Framework Policy) requires planning policies to protect and enhance the natural environment including the economic and other benefits of the best and most versatile agricultural land. This field is Grade 1 agricultural land (the best type), and is currently used to grow wheat. Th Local Plan Strategic Policy S4 states: ‘The Council will seek to minimise the loss of the best and most versatile agricultural land (Grades 1) to major new development.’</p> <ul style="list-style-type: none"> • This field is an important natural landscape view for local residents and there will be significant detriment and loss of enjoyment of current residents located beside the proposed site for development • Increased pollution – detrimental to local wildlife, and local people • There are houses on this land that are listed and part of their appeal is their historical positioning in the countryside with uninterrupted views. • Chelmsford County Council had already agreed to the published Broomfield Community Plan, and this development is not in line with the vision and objectives of that plan. • This site was not part of Chelmsford's original 10 year local plan in place until 2036. These new sites have been added due to problems funding A12 works and planned housing which already has infrastructure that has been built to support new communities (railway station, schools, GP, etc). The council should put more pressure on government to re-secure funding for these works to deliver the governments housing targets, rather than put further strain on struggling existing community infrastructure. <p>The points outlined above are based on valid factual information. This development will affect all residents in the locality and beyond.</p>

Question 4 - Executive Summary

Chelmsford Council is proposing a new residential development on Grade 1 agricultural land west of Patching Hall Lane. Local residents argue the site is unsuitable due to significant loss of privacy, light, views, and wellbeing; destruction of wildlife habitats; loss of valuable farmland; and removal of a key green buffer that prevents urban sprawl. Concerns include increased traffic, congestion, and noise; heightened risks to road safety for children walking to nearby schools; and greater pollution. The field plays a vital role in water drainage in a high flood-risk area, and development could worsen flooding for existing homes. Local infrastructure—including schools, GP surgeries, and public transport—is already over capacity. The plan conflicts with the Broomfield Community Plan and was not part of Chelmsford's original Local Plan.

ID	ASIIA-8
Person ID	1389476
Full Name	
Company / Organisation	Essex & Suffolk Water
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Water Impact
Question 2 - Please provide an explanation below:	<p>We have reviewed these documents in detail, and we set out our comments below which we feel are of relevance or have an impact on us, as the statutory water undertaker.</p> <p>Essex & Suffolk Water (ESW) undertakes many roles in its duty to provide water services to its regions. As a statutory undertaker in the provision of these services we are a formal consultee on all emerging planning policy. We strive to facilitate sustainable new development by influencing water management and supply and protection of our assets to ensure that our network supply and facilities have capacity to accommodate sustainable growth, as well as protecting the environment. We are working with Local Authorities to monitor proposed development and track growth.</p> <p>For Clarity, ESW is a water only company and as such our comments relate only to water supply and not waste water policies.</p> <p>We commend the Council on reaching this detailed stage in the preparation of the Local Plan. We generally support the aims and objectives of Chelmsford City Council which are set out within the local plan, and we will work with the council in any way we can to help support its delivery.</p> <p>The document Integrated Impact Assessment (IIA): Focused Consultation Additional Sites (Regulation 19) Addendum provides a summary of the anticipated water impact for each additional site. The effect of development on water resources within the area will not occur in isolation; it will be both cumulative and sequential. This means that as multiple sites are brought forward over time, the combined demand on water supply and network capacity will increase progressively. Early consideration of these cumulative impacts is essential to ensure that infrastructure planning keeps pace with growth and that sufficient water resources remain available to meet both domestic and non-domestic needs.</p> <p>ESW published its approved Water Resources Management Plan 2024(WRMP24) in October 2025, which includes measures to help meet future water resource demands. We acknowledge that any new development will increase demand on water resources and pressure on our network. To manage this effectively, it is essential that there is ongoing, open communication between the Council and ESW. This will ensure that development progresses in a timely and coordinated manner, allowing the necessary network upgrades and expansions to be delivered.</p>

ID	ASIIA-42
Person ID	311148
Full Name	
Company / Organisation	Essex County Council
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	General comment
Question 2 - Please provide an explanation below:	<p>The IIA correctly identifies that additional site allocations will increase pressure on existing GI but also create opportunities to expand and enhance GI networks through masterplanning and site design. Retention of Chelmsford's Green Wedge is a positive measure, safeguarding strategic GI corridors and supporting ecological connectivity. However, the assessment notes minor to significant negative effects on biodiversity for several sites, particularly where priority habitats or high-grade agricultural land are affected. This reinforces the need for robust mitigation and measurable Biodiversity Net Gain (BNG) delivery.</p> <p>The preferred approach—allocating smaller sites and increasing capacity at existing sites—is more sustainable than introducing large strategic sites, as it reduces infrastructure risk and limits cumulative biodiversity impacts. To ensure soundness and consistency with NPPF and the Environment Act 2021, as the “Responsible Authority” for the Essex Local Nature Recovery Strategy (ELNRS), which was published in June 2025 following the Regulation 19 consultation, ECC welcomes reference in the additional site policies to policy requirements regarding the natural environment seeking to retain and enhance existing natural landscaping, trees and hedgerows in and on the boundary of sites, providing suitable multifunctional green infrastructure, providing suitable flood risk management and Sustainable Drainage Systems (SuDS) and mitigating the potential effects due to recreational pressure on nearby designated European sites. Whilst the Additional Site policies do not require the need to have regard to the LNRS or set Biodiversity Net Gain (BNG) targets, it is noted that these requirements will be met through further requirements set out in the following policies:</p> <p>Strategic Policy S4 – Conserving and Enhancing the Natural Environment through the provision of well-connected multifunctional network of green and blue infrastructure which protects, enhances and restores ecosystems and allows nature recovery across the Council's area, maximising opportunities set out in the Local Nature Recovery Strategy. The requirement to deliver 20% Biodiversity Net Gain at the garden communities and a minimum 10% Biodiversity Net Gain at other qualifying sites. Contributions will also be sought as defined in the adopted Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS).</p> <p>Policy DM16 – Protection and Promotion of Ecology, Nature and Biodiversity – to provide a minimum 10% biodiversity net gain (20% on Chelmsford Garden Community and East Chelmsford Garden Community) and secured for a minimum of 30 years after completion.</p> <p>(Complete representation from Essex County Council attached - 311148AS-A.pdf)</p>
Attachment/s	311148AS-A.pdf

ID	ASIIA-35
Person ID	1301644
Full Name	
Company / Organisation	Gladman Developments Ltd
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Table 2.1
Question 2 - Please provide an explanation below:	<p>The Focussed Changes consultation is supported by an Integrated Impact Assessment (IIA) Addendum. Gladman raise concerns with the IIA Addendum, in particular the way that credible alternatives, or rather lack of, have been assessed.</p> <p>The IIA presents two options, yet only option 1 is a credible alternative for boosting supply in the early years of the plan. Identification of further strategic sites (500+ dwellings) is unlikely to boost short term delivery and therefore not a reasonable alternative for the purposes of the IIA Addendum.</p> <p>In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, local planning authorities must subject proposals in development plan documents to SA and prepare a report on the findings of the appraisal. No alternatives to the smaller proposed allocations are explored to the list of sites put forward by the Council for assessment. This is a significant failing of the IIA.</p> <p>In the case of Bicknacre, this is most alarming as Land West of Barbrook Way scores identically to Land East of Main Road promoted by Gladman also in Bicknacre but no assessment of this appears to have taken place nor assessment against each other. This is a flaw of the assessment that needs rectifying.</p> <p>As the motivation for the additional sites is to boost the supply of housing it may well be that identification of both sites could have been a credible option for the Council, but without that assessment it is not possible to determine as such.</p> <p>In a similar respect, the lack of consideration of further sites within Danbury, a Key Service Settlement, stems from the lack of looking at alternatives to those proposed by the Council.</p>
ID	ASIIA-36
Person ID	1301644
Full Name	
Company / Organisation	Gladman Developments Ltd
Consultation point - Please state clearly the relevant	Table 3.2

paragraph/table/figure/appendix of the IIA your comment relates to:

Question 2 - Please provide an explanation below:

The Focussed Changes consultation is supported by an Integrated Impact Assessment (IIA) Addendum. Gladman raise concerns with the IIA Addendum, in particular the way that credible alternatives, or rather lack of, have been assessed.

The IIA presents two options, yet only option 1 is a credible alternative for boosting supply in the early years of the plan. Identification of further strategic sites (500+ dwellings) is unlikely to boost short term delivery and therefore not a reasonable alternative for the purposes of the IIA Addendum.

In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, local planning authorities must subject proposals in development plan documents to SA and prepare a report on the findings of the appraisal. No alternatives to the smaller proposed allocations are explored to the list of sites put forward by the Council for assessment. This is a significant failing of the IIA.

In the case of Bicknacre, this is most alarming as Land West of Barbrook Way scores identically to Land East of Main Road promoted by Gladman also in Bicknacre but no assessment of this appears to have taken place nor assessment against each other. This is a flaw of the assessment that needs rectifying.

As the motivation for the additional sites is to boost the supply of housing it may well be that identification of both sites could have been a credible option for the Council, but without that assessment it is not possible to determine as such.

In a similar respect, the lack of consideration of further sites within Danbury, a Key Service Settlement, stems from the lack of looking at alternatives to those proposed by the Council.

ID	ASIIA-26
Person ID	1394380
Full Name	Mr RICHARD Grainger
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Section 3: Assessment of additional sites
Question 1	No
Question 2 - Please provide an explanation below:	<p>Sites 19 (East Hanningfield) and Site 20 (Rettendon Place) are wholly unsuitable for the proposed building volume.</p> <p>The B1245 is already at capacity in peak periods, with waiting times of up to half an hour to join both the Howe Green junction with the A12/A130, and the Rettendon Turnpike at the other end.</p> <p>Some 800+ houses are proposed to be built on these 2 sites + Bicknacre, with potential for 1500 or more additional cars at peak periods. This volume of traffic is unsustainable.</p> <p>Similarly, there are insufficient educational facilities for significant influx of people.</p> <p>Medical facilities are already overstretched, with it being virtually impossible to get a GP appointment in less than 2 weeks. No thought is given to the impact on such services.</p> <p>The inadequacy of water supplies is recognised, but no solution is offered.</p>
Question 4 - Executive Summary	Inadequate roads, schools and doctor facilities to support the proposed developments in Rettendon, East Hanningfield and Bicknacre.

ID	ASIIA-4
Person ID	1380086
Full Name	Mr Christopher Harp
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Section 3: Assessment of additional sites
Question 2 - Please provide an explanation below:	<p>I object to the proposed housing allocations within Growth Area 3 – South and East Chelmsford, on the grounds that the Integrated Impact Assessment (IIA) Addendum understates and defers significant adverse impacts on transport, healthcare, education, environmental assets and core infrastructure. Taken together, these deficiencies render the allocations unsound, contrary to the tests of being effective, justified and consistent with national policy.</p> <p>The IIA Addendum acknowledges that increased housing in peripheral and village locations will increase car-based travel, adding pressure to an already constrained highway network, including the A12, A130, A414 and A132 corridors, all of which are identified as suffering from congestion and pinch points.</p> <p>The A12 widening scheme traffic data report (2016) produced by Highways England shows that the A12 is already approaching capacity. They highlight: Junctions 23 to 22 (southbound) during the AM peak hour . Junctions 21 to 20b (southbound) during the AM peak hour. Junctions 20b to 20a (southbound) during the AM peak hour. Junctions 22 to 23 (northbound) during the PM peak hour. Junctions 20b to 21 (northbound) during the PM peak hour.</p> <p>This data was produced in 2016 before much of the existing housebuilding around Chelmsford. An updated traffic data report should be published before the local plan is adopted. The cancellation of the A12 widening scheme is pushing more traffic through rural, local roads.</p> <p>Healthcare Capacity – Growth Without Secured Provision.</p> <p>The IIA concedes that population growth in Growth Area 3 risks undermining the quality of existing healthcare services, particularly GP and primary care provision, unless new facilities are delivered alongside development. No specific, funded or time-bound healthcare infrastructure is identified for the South and East Chelmsford sites.</p> <p>Existing services, particularly in South Woodham Ferrers and surrounding villages, are already operating close to capacity.</p> <p>The local plan cannot rely on Broomfield Hospital which is currently underperforming. This approach is inconsistent with the requirement to align healthcare infrastructure with growth, and risks unacceptable pressure on NHS services.</p> <p>Education and Schooling – Acknowledged Capacity Deficits.</p> <p>The combined effect of multiple allocations across villages and edge-of-settlement sites will place significant pressure on primary and secondary education provision.</p> <p>The IIA’s conclusion that effects are “minor” or “uncertain” fails to reflect the cumulative reality of multiple developments feeding into the same limited education catchments.</p> <p>Environmental Impacts</p> <p>The IIA accepts that Growth Area 3 lies close to highly sensitive environmental assets, including:</p> <p>The Crouch and Roach Estuaries SPA and Ramsar sites, Multiple SSSIs and Local Wildlife Sites, Areas vulnerable to recreational pressure, air quality impacts and water pollution.</p> <p>The assessment relies heavily on the assumption that impacts will be “addressed at project level”.</p> <p>The scale of in-combination effects from multiple sites is downplayed.</p> <p>There is clear uncertainty over wastewater capacity, water quality and Water Framework Directive compliance, particularly for South Woodham Ferrers and Rettendon Place.</p> <p>Allocating sites before demonstrating that no adverse effect on integrity can be ruled out is premature and legally risky.</p> <p>Water supply and wastewater treatment infrastructure face constraints that will require future strategic investment.</p> <p>Development assumes upgrades to utilities, transport and community infrastructure that are not yet secured or funded</p> <p>The local plan is not positively prepared due to a lack of focus on sustainable development for local rural and countryside communities.</p> <p>It is not justified, there are no reasonable alternatives in the document.</p> <p>The plan cannot be effective, it will not be delivered over the plan period due to the huge assumptions, inadequate planning.</p>

	<p>It is not consistent with NPPF, where there is a requirement that development should only be allocated where safe and suitable access can be achieved and where impacts on the transport network are not severe.</p> <p>The plan relies on future infrastructure investment assumptions, rather than secured delivery mechanisms. Additional homes being built across Chelmsford require sufficient and substantial infrastructure investment. It is not in the interest of the people of Chelmsford, who you represent, to continue with mass-housebuilding without respective investment in transport and highways, healthcare facilities, education and the natural environment.</p>
<p>Question 4 - Executive Summary</p>	<p>Growth Area 3 – South and East Chelmsford represents a pattern of incremental, dispersed development that cumulatively:</p> <p>Exacerbates transport congestion, Overloads healthcare and education services, Places unacceptable pressure on sensitive environmental assets, Relies on infrastructure that is neither secured nor deliverable. The IIA addendum itself identifies many of these risks but seeks to neutralise them through assumptions, mitigation at a later stage, and uncertainty scoring. This is not a robust basis for allocation.</p>

ID	ASIIA-56
Person ID	310453
Full Name	Mr Neil Hawes
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	my comments relate to the objection to development in Ford End
Question 1	Yes
Question 2 - Please provide an explanation below:	<p>I object to the proposed development (Site 14b) on the following grounds .</p> <p>From simple searches on Google there is a mind blowing amount of development around Ford End with the lack of relevant infrastructure.</p> <p>I am unable to see any plans for new doctors surgeries to support the Parish of Great Waltham and with the Government recently scraped the new hospital at junction 7a on the M11. Broomfield hospital is already at full stretch . With the vast numbers of homes being built around Maldon , Danbury Chelmsford and Dunmow the Hospital will be over run with patients.</p> <p>Beaulieu Park is producing 3600 homes, Channels 2500 homes, there are another 38 homes being built in Felsted. 800 new homes are proposed just south of the Race Course and more to the East of the A131 Great Leighs.</p> <p>Just North of Ford End over 200 homes are being proposed by Uttlesford Council opposite North End and the Butchers Arms Pub.</p> <p>Further to this the Woodlands Park development in Great Dunmow has 769 homes, however upon closer inspection of the Great Dunmow Town Council development plan there is a proposal to build a further 2019 homes, taking the total for Great Dunmow to 2788. The reality is this means that there are 8126 that have been or will be built within a 5 mile radius of Ford End</p> <p>If you double that radius to 10 miles, it captures the proposed 5000 new homes on the former RAF Wethersfield site. (now housing 1200 asylum seekers)</p> <p>A recent traffic survey conducted on the B1008 through Ford End, showed a 35.9% increase in traffic from 2021. With the above an increase in housing surrounding Ford End and further development of this small village, further substantial increase in vehicles will pass through our village going between the A120 and Chelmsford.</p> <p>Lorries using the A131 to bypass the villages puts at least an extra 20 miles on the journey, which they say increases their carbon footprint.</p> <p>The original plan for Ford End was for 20 homes ,suddenly. Dandara the chosen developer, has held a local consultation for more than double to 50 houses. Now we find that the council want to increase that number to 75 which will increase the size of our village by more than a half.</p> <p>As can be seen by their Master plan (see attachment FEplanning) there are 3 didict development areas where 50 houses will be built. Along with that they propose a community feature and grassed areas. Both not required as the village already has a park with wild land football pitches play equipment and picnic tables and a village hall,</p> <p>I pointed this out to the planning officer but she said she was unaware as no formal planning had been put in. I find this hard to believe as one of our local Parish Councillor is also a City Councillor, and County Councillor surely this has been discussed at council meetings.</p> <p>From your consulation board The City Council is giving smaller development sites to smaller construction companies. Dandar is a huge company with offices all around the UK and Jersey with Directors resident in the Isle of Man!</p> <p>Again I pointed this out to the planning officer bt she said she was unaware of the company. Its a quick Companies House search. Have the City Council undertaken due diligence on the companies they are using (see screenshot in attachment FEplanning)</p> <p>Dandara stated that the affordable housing allocated in this plan will be sold to Chelmsford Housing Partnership so they can be rented to Chelmsford City Council . the Felsted Gate development has 5 affordable homes but they are not for sale to locals but to a housing partnership.</p> <p>I have now been informed by the Leader of Chelmsford City Council, that all Affordable Housing is sold privately to Chelmsford Housing Partnership to be rented back to the Council I thought the whole idea of affordable homes was for local residents to get on the property ladder and are able to live in the area they grew up in. My daughter has had to move nearly an hour further north to be able to afford property. A number of her friends are doing the same.</p> <p>With regards biodiversity, The council states that it will not cut down trees for the development. Making the entrance into the estate will involve removing mature trees and animal habitat with the installation of a Roundabout . I am aware that Highways want to take 6m of land designated VG150 for this purpose</p>

	<p>Building on the land will disrupt the transient movement and feeding areas of deer and badgers that can be regularly seen at night crossing the road and throughout the village</p> <p>Two animal crossing points from Pleshy Road into the proposed development area (see photos in attachment FEplanning)</p> <p>And lastly , this proposed development is on prime grade 2 agricultural land .</p> <p>During the First World War, the UK had food security for 6 weeks, now we can only boast security for 6 days. If you keep building on agricultural land you are reducing the ability of UK food production, raising costs of food and making us more reliant on imported food along with the increase in the carbon footprint. Within 10 years over 15% of farmland will have been built over</p>
Question 3	no
Question 4 - Executive Summary	<p>Objection to building on grade 2 agricultural land.</p> <p>within 10 years 15% of agricultural land will be built on . The UK will rely on imported food increasing our carbon footprint</p>
Attachment/s	310453 A.docx

1360409, Alasdair, Heathcote

ID	ASIIA-15
Person ID	1360409
Full Name	Alasdair Heathcote
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Added sites: 11c – Bicknacre, 21a & 21b – Woodham Ferrers
Question 1	No
Question 2 - Please provide an explanation below:	<p>The proposed addition of up to 250 additional houses on this site is unsustainable in a small village like Bicknacre. The proposed access vis Barbrook way cannot take the enormous increase in traffic volume that 250 homes will create. The current situation is poor due to the significant increase in car ownership since Barbrook Way and Thrift Wood were originally built. Most homes nor have 2 vehicles - some 3 or more. The current level of street parking make access by service vehicles (e.g. Waste/Recycling Collection) difficult . Luckily, we have not yet had a significant attendance by Fire Vehicles but it can be foreseen as a major problem if the additional traffic is added. The use of a green field site is unacceptable when Chelmsford already has a long list of brown field sites that ae not being utilised in the proposed plan.</p> <p>The existing school and medical facilities in Bicknacre would not be able to support the additional population that 250 homes will bring. This site has too many issues to make it a viable site - existing approved sites such as the Development area in South Woodham have not been activated despite the construction of a health centre and a major supermarket. Without a detailed proposal to upgrade schools, health facilities and road access the proposed site is unworkable.</p>
Question 3	As referenced by Woodham Ferrers and Bicknacre Paris Council - there is not a legal access point to the proposed site from Barbrook Way . Also, Essex Water have a major high pressure water aqueduct passing through this site. have they been consulted re any development?

ID	ASIIA-3
Person ID	1396975
Full Name	Owen Hoare
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Allocation 11c - Land West of Barbrook Way, Bicknacre
Question 1	No
Question 2 - Please provide an explanation below:	<p>Please see attached document (Local Plan Rep - Barbrook Way.pdf)</p> <p>(This representation is submitted on behalf of concerned local residents of Bicknacre who object to the proposed designation of Strategic Growth Site Policy 11c, Land West of Barbrook Way, Bicknacre, for around 250 dwellings and associated uses in the Focused Consultation Additional Sites (Regulation 19) document.</p> <p>The allocation is not sound because it is not justified, in that it is not the most appropriate strategy when considered against reasonable alternatives, including other additional sites and brownfield opportunities that perform better in the Integrated Impact Assessment. It is not effective, as it would impose a disproportionate scale of growth on a small village with limited infrastructure and poor sustainable transport choices, contrary to the settlement hierarchy. It is also not consistent with national policy, particularly the requirement to focus significant development on locations that are or can be made sustainable, and to protect and enhance valued landscapes, biodiversity, best and most versatile agricultural land, and the historic environment.</p> <p>Accordingly, the allocation should be reverted to a modest capacity more in line with the earlier Pre Submission allocation of around 20 dwellings on a small part of the site.</p> <p>Discussion of Scheme:</p> <p>Plan context and scale of growth at Bicknacre</p> <p>Under the Preferred Options, Bicknacre was clearly identified as a location for only modest, proportionate growth. The village was to accommodate limited additional housing through relatively small allocations, including St Giles (approximately 32 dwellings), with Growth Site 11c shown as a small site of around 1 hectare, envisaged for about 20 dwellings. That approach reflected Bicknacre's position in the settlement hierarchy and its relatively limited range of services, facilities and public transport.</p> <p>In stark contrast, the Additional Sites consultation now proposes to increase the capacity of Site 11c to around 250 homes, together with a community facility and a stand alone early years nursery. This scale of development would be a major extension of the village in local terms, and would fundamentally alter its character and function.</p> <p>Such a change represents a clear change in the role of Bicknacre within the spatial strategy. The settlement is no longer being asked to take a modest, proportionate level of growth. Instead, it is being recast as a location for very substantial expansion. The uplift from around 20 to 250 homes is more than a twelvefold increase in site capacity, and is wholly inconsistent with the way Bicknacre has been treated throughout the plan review process to date. It raises obvious questions about the internal coherence of the spatial strategy, the settlement hierarchy and the distribution of growth between more and less sustainable locations.</p> <p>The Preferred Options consultation responses also demonstrate very strong local opposition to Growth Site 11c even at the much smaller scale originally proposed. For that site there were no responses in support, 104 responses not supporting, and 123 comments in total. The objections raised a wide range of planning concerns, including pressures on already limited infrastructure and services, increased traffic on a constrained local road network, loss of agricultural land, harm to wildlife and biodiversity, flood risk and drainage issues, and deliverability concerns related in particular to access from Barbrook Way.</p> <p>In the face of this clear and consistently expressed feedback, the Council is not only retaining Site 11c but significantly enlarging it, at the same time as identifying other additional sites in locations which appear, on the Council's own evidence, to be more sustainable. Proceeding in this way gives the strong impression that consultation responses have been afforded very limited weight. It undermines confidence in the integrity of the plan-making process, and makes it difficult to see how the allocation of an enlarged Site 11c can be regarded as a justified choice when considered against reasonable alternatives, as required by the soundness tests.</p> <p>Conflict with the spatial strategy and settlement hierarchy</p> <p>The emerging Local Plan is structured around a clear spatial strategy. It seeks to concentrate the majority of new growth within the Chelmsford Urban Area, strategic locations such as Chelmsford Garden Community and Hammonds Farm, and other larger, better-served settlements. Alongside this, the plan emphasises the need to avoid coalescence between distinct villages and to safeguard the separate identity and character of existing settlements. Within that framework, smaller villages such as Bicknacre are expected to accommodate only modest, proportionate levels of development that reflect their role, size, and level of services.</p>

Against this context, the scale of development now proposed at Site 11c in Bicknacre sits uneasily with the plan's core principles. Bicknacre is a relatively small settlement with a limited range of facilities, employment opportunities and public transport connections. The Preferred Options correctly recognised that growth in this location should be modest in order to remain consistent with the settlement hierarchy. The current proposal for around 250 dwellings would amount to a very substantial percentage increase in the village's existing housing stock. In practical terms, this would shift Bicknacre from a village experiencing limited infill and small extensions to one undergoing a major expansion, with inevitable implications for its scale, built form and overall character.

The physical form of the proposal also conflicts with the strategic aim of avoiding coalescence and maintaining clear separation between settlements. Site 11c extends the built up area of Bicknacre southwards into open countryside, pushing development toward East Hanningfield and eroding the rural gap that currently separates the two villages. The open land in this area contributes to the perception of Bicknacre and East Hanningfield as distinct rural settlements with their own identities. Allowing such a large greenfield release in this location runs directly counter to the plan's own statement that allocations will be located in a way that maintains the distinctive character of existing settlements and avoids coalescence.

The Additional Sites Integrated Impact Assessment (IIA) reinforces these concerns. As a greenfield release on agricultural land, Site 11c is given a negative score against Objective 7 (land use and soils), reflecting the permanent loss of countryside and productive land. The IIA also records mixed or negative effects in relation to several other objectives, indicating that the site performs weakly when assessed against the plan's own sustainability framework. This is not a site that arises as a natural choice from the underlying evidence base.

In contrast, the same IIA shows that urban brownfield opportunities, such as the former Kay Metzeler premises at Brook Street, perform significantly more strongly in sustainability terms. Those sites deliver positive effects for a range of objectives including housing delivery, the local economy, sustainable living patterns, health, transport and land use and soils. Importantly, the IIA identifies no negative effects for biodiversity or water in relation to those urban brownfield allocations. This direct comparison underlines that there are more appropriate and more sustainable locations within the existing settlement hierarchy and spatial strategy to accommodate any additional housing capacity that may be required. Persisting with a large greenfield allocation at 11c in Bicknacre, in preference to better performing urban sites, therefore conflicts with both the stated spatial strategy and the plan's own sustainability evidence.

Findings of the Integrated Impact Assessment

The Integrated Impact Assessment (IIA) Addendum appraises Site 11c as an increased capacity site (reference CFS158). The conclusions of that assessment are highly significant. Read fairly, they point away from allocating this site for a major housing scheme rather than supporting its inclusion.

In relation to biodiversity, the IIA records a negative effect against Objective 1. This is explicitly linked to the proximity of the site to a priority habitat within 100 metres and to the fact that it lies within 800 metres of a Site of Special Scientific Interest, a local wildlife site and an area of ancient woodland. In other words, the site sits within a sensitive ecological context where there is a clear risk of cumulative and indirect effects on designated and priority habitats.

The IIA also identifies a negative effect for Objective 8, which relates to water. This is attributed to the site's proximity to a water body within 10 metres and the potential for adverse impacts on water quality and local hydrology. Increasing the scale of development in such a location inevitably heightens the risk of harm to water environments and the need for costly and complex mitigation.

For Objective 13, cultural heritage, the IIA again records a negative effect. This arises from the site's relationship with nearby listed buildings and, in particular, the proximity of Bicknacre Priory Scheduled Monument. The presence of a designated heritage asset of this importance within the wider setting of the site is a significant constraint. Large scale development on the edge of the village would be highly likely to affect the monument's setting and the way in which it is experienced and understood, even if direct physical impacts could be avoided.

These conclusions are reflected in the summary table of site performance. For Site 11c, the table shows a negative score for Objective 1 (biodiversity) and for Objective 7 (land use and soils), the latter reflecting the permanent loss of greenfield agricultural land. For Objectives 3, 4, 5 and 6, which cover the economy, skills and employment, sustainable living and revitalisation, health and wellbeing, and transport, the scores are mixed, indicating a combination of positive and negative effects rather than a clear overall benefit. For Objective 8 (water) and Objective 13 (cultural heritage) the effects are recorded as negative or uncertain, again underlining that the site is environmentally constrained and sensitive from a heritage perspective.

Put simply, the Council's own IIA acknowledges that while Site 11c would deliver additional housing, it is a constrained and sensitive location. It carries clear environmental constraints and only mixed or uncertain performance in relation to key objectives such as the local economy, sustainable living patterns, health, transport and cultural heritage. On any objective reading, this is not the profile of a strong candidate for a large edge of settlement allocation of around 250 dwellings.

The IIA also confirms that the Council had a genuine choice of spatial response when addressing the five year housing land supply issue. Option 1, which has been selected, involves a package of additional small and medium sized sites. Option 2, which would have involved one or more additional strategic sites, was rejected as less sustainable overall. However, even once Option 1 was preferred, the Council still needed to select the best performing sites within that broad approach.

On that point, the IIA is very clear. It shows that other additional sites, and in particular the urban brownfield opportunity at the former Kay Metzeler premises, perform materially better than Site 11c. Those sites achieve stronger scores across a range of objectives and are subject to fewer environmental and heritage constraints. They represent a closer fit to the spatial strategy and to the core principle of making efficient use of previously developed land in sustainable locations.

In these circumstances, the decision to retain Site 11c at the greatly increased scale now proposed cannot reasonably be described as justified. The Council's own IIA evidence identifies reasonable alternatives which would deliver comparable housing numbers with significantly fewer adverse effects. Persisting with a large allocation at 11c in the face of that evidence fails the test of justification required for soundness.

Biodiversity and Thrift Wood SSSI

The ecological sensitivity of the Bicknacre area is well established and has been highlighted consistently through the plan-making process. Natural England and the Forestry Commission have repeatedly stressed, in their responses to the Preferred Options consultation, that any allocations at Bicknacre must fully consider the cumulative effects on Thrift Wood SSSI, nearby ancient woodland and the wider network of priority habitat woodland. In other words, this is not an ordinary edge of village greenfield location. It sits within a wider landscape that plays an important role in supporting designated and priority habitats of more than local importance.

The Integrated Impact Assessment Addendum confirms this sensitive context in explicit terms. It records that Site 11c lies within approximately 800 metres of a Site of Special Scientific Interest, a local wildlife site and an area of ancient woodland. It also notes that the site is within around 100 metres of priority habitat woodland and is adjacent to a water body within roughly 10 metres. Taken together, these relationships place the site within the functional ecological envelope of Thrift Wood and other important habitats, where changes in land use, water management and human activity can have direct and indirect effects.

Relationships of this kind inevitably raise concerns about hydrological impacts, recreational pressure, light and noise disturbance, and the incremental loss and fragmentation of habitats. Development at the scale now proposed will alter patterns of surface water run off and drainage, with the potential to affect local watercourses and groundwater regimes that support sensitive woodland and wetland habitats. An enlarged settlement edge will increase lighting, noise and general human activity close to the countryside, with the potential to disturb wildlife and to erode the dark, quiet conditions on which many species depend.

The site itself forms part of the wider countryside setting that links Bicknacre to Thrift Wood and associated habitats. At present it contributes to a relatively open, rural transition between the village and the designated woodland. Introducing a 250 dwelling estate in this location would significantly change the way this landscape functions and is experienced. It would greatly increase the number of residents using nearby fields, paths and lanes for dog walking and informal recreation, and would generate additional car trips to nearby countryside and woodland car parks. Even with mitigation measures, this level of additional recreational pressure is likely to increase trampling, disturbance, litter, nutrient enrichment and other impacts on sensitive sites.

These risks are particularly concerning in the light of Natural England's earlier request that the Council consider the cumulative effect of all Bicknacre sites on Thrift Wood SSSI and related habitats. That request was made when a much smaller scale of development at Site 11c was envisaged. It is even more relevant now that the capacity of 11c is proposed to grow from around 20 dwellings to approximately 250. The cumulative footprint and level of activity associated with development in this part of Bicknacre would be transformed, with a corresponding increase in pressure on the SSSI and surrounding priority habitats.

Given this evidence and the clear advice from statutory consultees, it is very difficult to reconcile the allocation of such a large scheme in this location with national policy on biodiversity net gain, nature recovery and the protection and enhancement of SSSIs. National policy expects decision makers to give great weight to the conservation and enhancement of designated sites and irreplaceable habitats, and to plan positively for nature recovery networks rather than incrementally eroding them. Setting aside a large tract of sensitive countryside for a 250 home estate, in close proximity to Thrift Wood and associated habitats, sits uneasily with those objectives.

At the very least, if any development is to be contemplated in this area, it should be at the much smaller scale originally considered at Preferred Options, supported by a substantial green buffer, robust habitat protection and enhancement measures, and stringent limits on recreational impacts. A major housing scheme of around 250 dwellings, with the associated level of activity and infrastructure, is simply not compatible with the environmental baseline identified in the Council's own evidence.

Heritage impacts, including Bicknacre Priory Scheduled Monument

The Integrated Impact Assessment records a negative effect for Objective 13, Cultural heritage, in relation to Site 11c. This is explicitly attributed to the site's proximity to listed buildings and to Bicknacre Priory Scheduled Monument. That conclusion reflects the particular sensitivity of this historic environment and should be afforded considerable weight when decisions are made about the scale and form of development in this location.

The scheduled remains of Bicknacre Priory, together with their associated historic landscape, derive much of their significance from their rural setting and from the ability to understand and appreciate the historic relationship between the priory, the surrounding agricultural land and historic routeways. The priory was founded and functioned in a countryside context and that context remains legible today. Open land, fields and lanes all contribute to the way in which the monument is experienced, and to the ability of visitors and residents to understand its origin and purpose.

Introducing a development of around 250 dwellings on the western edge of Bicknacre would fundamentally alter that context. It would extend the built form of the village much closer to the scheduled monument, narrowing the rural gap that currently separates the settlement from the historic site. What is presently perceived as a distinct historic complex within a predominantly rural landscape would increasingly be read as lying on the fringe of a significantly enlarged village. The proposal would also introduce large areas of modern housing, street lighting, traffic and general urban activity into views from and towards the monument. Night time and low light conditions in particular would be changed by additional lighting and vehicle movements, eroding the sense of remoteness and rural tranquillity that currently characterises the area. Together these changes would diminish the contribution that the countryside setting makes to the monument's significance and to the way it is experienced and appreciated.

The allocation policy as currently drafted contains only generic requirements for landscaping and mitigation. It does not demonstrate that the specific impacts on the significance of Bicknacre Priory and nearby listed buildings have been properly assessed, understood and minimised, as required by the National Planning Policy Framework. This is in marked

contrast to the position set out at the Preferred Options stage, where consultation responses for Bicknacre sites recognised that Historic England expected detailed heritage impact assessment to inform whether particular sites were suitable for allocation and, if so, at what capacity. That expectation reflected national policy requirements and should have formed a key part of the evidence base before deciding to increase the capacity of 11c so dramatically.

In these circumstances, allocating Site 11c for around 250 dwellings, when the Council's own IIA already identifies a negative effect on cultural heritage, is very difficult to reconcile with the great weight that national policy requires to be given to the conservation of heritage assets. The decision to press ahead with a large allocation in the setting of Bicknacre Priory runs counter to the precautionary and evidence led approach that the NPPF expects. It again points to the need to direct growth of this scale to less sensitive locations and to avoid major new built development in the rural setting that underpins the significance of Bicknacre Priory Scheduled Monument.

Landscape, settlement character and recreational impacts

Site 11c consists of open arable fields and pasture on the rural edge of Bicknacre. In its current form it provides an attractive countryside setting for the village, reinforcing its rural character and contributing to the clear physical and visual separation between Bicknacre and East Hanningfield. Public rights of way, including St Peter's Way along the northern boundary, currently benefit from open, undeveloped rural views across fields and towards the wider landscape. This combination of open land and public access is an important part of how the settlement is experienced and understood.

Introducing a suburban style estate of around 250 dwellings in this location would fundamentally alter that character. The present open countryside would be replaced by continuous built form, estate roads and associated highway infrastructure. Rather than reading as a modest village edge, the development would present as a substantial urban extension, visibly pushing the built up area of Bicknacre southwards and westwards into what is currently open countryside. In visual and experiential terms, it would move the perceived edge of the village significantly closer to East Hanningfield. That change would noticeably narrow the gap between the two settlements and increase the risk of gradual coalescence over time, directly at odds with the Local Plan's stated aim of locating allocations so that distinct settlement character is maintained and coalescence is avoided.

The impact on recreational users of the area would also be marked. St Peter's Way is an established long distance route and at present offers walkers and other users a rural experience on this stretch, with views across fields and a sense of being on the edge of open countryside. If Site 11c were developed for 250 dwellings, users would instead find themselves passing alongside a large housing estate for a significant distance, with associated boundary treatments, lighting, noise and activity. The character of this section of the route would shift from rural to suburban and the perceived separation between village and countryside would be eroded.

The Integrated Impact Assessment scores landscape and townscape effects for Site 11c as neutral overall but with uncertainty, recognising that significant mitigation would be required to limit harm. Given the very open nature of the site and the scale of the development now proposed, it is highly doubtful that landscaping and open space within the red line boundary could genuinely mitigate the adverse visual and character impacts. Structural planting and buffers would take many years to mature and would not disguise the fundamental change from fields to a large built up estate.

This is precisely the kind of sensitive edge of settlement location where a modest allocation, limited to a small part of the site and carefully designed, might potentially be accommodated without unacceptable harm. A scheme of around 250 dwellings, however, is far too intensive for this landscape context and would result in a permanent and disproportionate change to the character and setting of Bicknacre.

Highways and transport

The draft policy indicates that the main vehicular access to Site 11c would be taken from Barbrook Way and/or Priory Road. However, the detailed analysis undertaken as part of the current planning application for this land already demonstrates that this approach gives rise to serious concerns and is not a robust basis for accommodating a development of around 250 dwellings.

Barbrook Way is a residential estate road that was originally designed and built as a cul de sac. Its alignment, carriageway width, on street parking patterns and junction arrangement were never intended to cater for the volume and type of traffic associated with a large housing estate, including regular flows from 250 dwellings, frequent service vehicles and prolonged periods of construction traffic. Channelling a development of this scale through Barbrook Way would significantly intensify vehicle movements on a road with inherently limited capacity and introduce a level of traffic activity that is out of keeping with its design and with the reasonable expectations of existing residents.

The junction of Barbrook Way with Priory Road already has to manage turning movements from existing traffic. At present this already creates busy periods when children are walking to and from the bus stop and when traffic conditions are more complex. Adding the additional turning movements generated by 250 dwellings at this point would inevitably worsen congestion, increase queuing and heighten road safety risks. These risks would be particularly acute for children and other pedestrians crossing or waiting in the vicinity of the junction during peak times.

More broadly, the site is not located on a high quality public transport corridor. Bus services in Bicknacre are limited in frequency and coverage, and there is no railway station in the village. For most residents of a new estate on Site 11c, access to jobs, higher order services, leisure facilities and secondary education would be heavily dependent on the private car. In practice this would mean a substantial increase in traffic on the surrounding rural road network, with associated impacts on congestion, road safety, noise and air quality in both Bicknacre and neighbouring settlements. That pattern of movement sits uncomfortably with the Local Plan's stated aspirations to promote sustainable travel choices and reduce reliance on the private car wherever possible.

While the Local Plan is informed by strategic highway modelling, the Preferred Options consultation feedback records that many respondents questioned whether such modelling adequately captures conditions in rural locations and on minor roads. In relation to Bicknacre in particular, there were repeated concerns about the limited capacity of the local transport network and the absence of realistic alternatives to car use. Given these local circumstances, the decision to allocate a large scheme of around 250 dwellings at Site

11c does not represent an effective or sustainable way of meeting housing needs. It places disproportionate strain on constrained local roads, conflicts with the plan's sustainable transport objectives and ignores clear evidence about the limitations of the existing highway and public transport infrastructure in this part of the district.

Flood risk, drainage and the water environment

Representations submitted at the Preferred Options stage in relation to Site 11c and other Bicknacre allocations consistently highlighted local concerns about flood risk and drainage. In particular, respondents referred to flooding associated with Sandon Brook and to existing limitations in the capacity of local drainage infrastructure. These are not abstract or theoretical issues. They reflect experienced problems on the ground and a reasonable apprehension that large scale new development could exacerbate them if not very carefully managed or, ideally, avoided.

The Integrated Impact Assessment Addendum confirms that these concerns have a clear evidential basis. It records a negative effect in relation to the water environment for Site 11c, noting that the site lies very close to a water body and in an area where impacts on water quality and hydrology are a realistic concern. The assessment recognises that this is a sensitive location from a water perspective and that significant risks arise from changing the pattern of land use and surface water run off at the scale contemplated.

Although the draft policy refers to the use of sustainable drainage systems to manage run off, that reference does not change the fundamentals. A development of around 250 dwellings on greenfield land will inevitably result in a very substantial increase in impermeable surfaces such as roofs, roads and hardstandings. It will also generate a significant increase in foul flows to the local sewerage network. In a location where flooding and drainage issues are already a matter of local concern, the cumulative effect of this additional burden is likely to be considerable, even if mitigation measures are put in place. There is a real risk that problems could be displaced elsewhere within the catchment or worsened during extreme events.

National planning policy is clear that plan making should avoid placing new development in locations that are, or are likely to be, at higher risk of flooding when there are reasonably available alternative sites with a lower risk. It also places strong emphasis on safeguarding and improving water quality and on ensuring that new development does not increase flood risk elsewhere. In the case of Site 11c, the combination of local experience, the IIA's negative scoring for water and the scale of the allocation strongly suggests that this is not an appropriate location for a large housing scheme. Persisting with an allocation of around 250 dwellings here is difficult to reconcile with the national policy imperative to steer growth away from areas of greater flood and drainage sensitivity and to protect the water environment.

Loss of agricultural land and best use of brownfield land

The Integrated Impact Assessment assigns Site 11c a negative score for land use and soils. This reflects the simple fact that the proposal involves the loss of agricultural land on a greenfield edge of village site. In choosing to expand 11c to around 250 dwellings, the plan would be committing a substantial area of productive countryside to permanent built development in a location that does not perform well in sustainability terms and that is already sensitive from an environmental and heritage perspective.

This approach sits uneasily with the wider choices that are available to the Council, as evidenced in the Additional Sites document. Alongside the proposed enlargement of 11c, that document identifies a number of new and expanded allocations that are either previously developed or are better related to existing employment areas and sustainable transport corridors. A clear example is the former Kay Metzeler premises at Brook Street, a brownfield site within the Chelmsford Urban Area identified for around 100 homes. Bringing this site forward would make efficient use of previously developed land in a highly sustainable urban location, supporting regeneration and reducing pressure on the rural hinterland.

The IIA commentary on the delivery strategy acknowledges that brownfield opportunities within the district are limited and that substantial greenfield releases will be required over the plan period. However, it also emphasises that, within that context, alternative sites should be selected in a way that minimises adverse effects on landscape and the rural environment, and that the redevelopment of brownfield land offers important opportunities to improve townscapes and make more efficient use of land in urban areas. That commentary reinforces the need for careful prioritisation between available options rather than simply layering additional greenfield allocations on the edges of smaller settlements.

In light of these choices, it is not credible to suggest that the substantial expansion of Site 11c is necessary in order to demonstrate a five year housing land supply. The majority of the additional capacity now proposed can clearly be met through a combination of more sustainable locations, particularly brownfield sites within the urban area and urban extensions that perform better in the IIA and align more closely with the spatial strategy. Persisting with the inclusion of Site 11c at around 250 dwellings, in the face of this evidence, does not reflect an approach that selects the least harmful or most sustainable alternatives. It therefore fails the test of being the most appropriate strategy when considered against reasonable alternatives, as required for soundness.

Preferable alternatives for additional housing growth

The Additional Sites Integrated Impact Assessment explains that, in order to restore a five year housing land supply, the Council considered two broad spatial responses. Option 1, which has been adopted as the preferred approach, is a package of additional small and medium sized sites and capacity increases. Option 2, which would have relied on one or two new large strategic sites, was rejected as less sustainable overall. That decision places even greater importance on making the right choices within Option 1, so that additional growth is directed to the most sustainable locations and avoids unnecessary harm.

Even within the framework of Option 1, the IIA clearly reveals a hierarchy of sustainability between the available sites. At the top of that hierarchy sits the former Kay Metzeler site at Brook Street. This is a previously developed site within the Chelmsford Urban Area which scores strongly in the IIA for transport, sustainable living, health and land use. It benefits from good access to services, jobs and public transport and contributes to urban regeneration objectives. Importantly, the assessment records no negative scores for biodiversity or water, reflecting the absence of the kind of environmental sensitivities that affect rural greenfield locations such as Bicknacre. Other new sites introduced through the Additional Sites process, including those at Boreham, East Hanningfield, Rettendon Place and Woodham Ferrers, also perform at least as well as Site 11c across most objectives. Crucially, they do so without the same combination of biodiversity, heritage and water environment constraints that characterise an enlarged 11c.

At the Preferred Options stage, consultation responses emphasised the importance of bringing forward a good mix of smaller sites in inherently sustainable locations, rather than relying too heavily on large rural extensions to smaller settlements. That feedback sits comfortably with the pattern of stronger performing sites identified in the IIA and with national policy expectations around focusing growth on urban areas, larger settlements and locations with or close to good infrastructure. In this context, it would be more appropriate to maximise appropriate capacity on brownfield land and on urban edge sites that already perform well in the IIA, so far as this can be achieved without causing unacceptable local impacts. It would also be sensible to consider modest additional capacity at existing strategic locations that already benefit from, or will in future benefit from, stronger infrastructure provision, rather than loading a disproportionate share of the extra growth requirement onto Bicknacre.

By contrast, Bicknacre was consistently identified in the Preferred Options as a location for limited, proportionate growth, reflected in the small allocations already identified at that stage. Maintaining that role, and resisting the introduction of a new large scale edge of village scheme at Site 11c, would align with both the settlement hierarchy and the IIA evidence. A rebalanced package that focuses additional growth on higher scoring brownfield and urban extensions, allows some limited uplift at strategic locations with better infrastructure and retains Bicknacre in its established role as a village for modest growth would still meet the overall housing requirement and improve the five year supply position. At the same time, it would deliver a more coherent, sustainable and justified spatial pattern of development than a strategy that depends on a 250 dwelling allocation in a sensitive rural location at Bicknacre.

SHELAA Scoring Concerns:

The Council's SHELAA scoring for Site 11c appears to assign uniformly high ratings (5) across key deliverability and constraints criteria, including vehicle access, land ownership, legal constraints, viability, deliverability timescale, archaeological assets and flood risk. In the context of the known and unresolved issues affecting this site, that outcome gives rise to concerns that the methodology has not been applied in a sufficiently evidence led or precautionary way. The resulting scores appear to understate both delivery risk and the scale of constraint.

Access and deliverability assumptions are not robust. A score of 5 for vehicle access and deliverability is difficult to reconcile with the acknowledged uncertainty over the site's principal access, including the potentially unresolved ownership of the strip of land required to implement the proposed entrance. The existence of a ransom strip type issue is not a minor detail, as it goes to whether a lawful, implementable access can be secured at all, and if so on what timescale and at what cost. Reliance on an indemnity insurance policy does not resolve the fundamental planning and delivery risk, particularly where the ability to deliver the access is outside the control of the promoter. These factors indicate a material uncertainty that should be reflected in the scoring, rather than treated as neutral.

The scoring appears to discount live highways concerns and an evolving access strategy. The emerging Local Plan position refers to access via Barbrook Way and/or Priory Road, yet the position described to residents is that the sole operational access would be via Barbrook Way, with construction traffic routed separately via Priory Road because Barbrook Way is not suitable for construction traffic. This reinforces that access is not straightforward and remains contested in principle and detail. It is also recorded that the highway authority had not responded to the outline application because additional time was required to consider local concerns and implications, and that access is likely to be critical to whether the scheme is approved. Against that background, a maximum score for vehicle access, legal constraints and deliverability timescale appears unsupported and premature.

Environmental and heritage constraints do not appear to have been properly translated into the scoring. A score of 5 for archaeological assets is difficult to justify where statutory consultee concerns have been raised and additional survey work has been requested, and where wider heritage related sensitivities in the locality are being actively evidenced. Where the evidence base is incomplete and further survey requirements are known, scoring should reflect uncertainty and the potential for mitigation led reductions in developable area or capacity, rather than assuming no constraint.

Flood risk and drainage constraints appear understated. Localised surface water flooding at and near the site entrance has been identified by residents. Concerns have also been raised that the preliminary concept work does not demonstrate clear, deliverable mitigation in the location where problems are experienced. A maximum score for flood risk constraints is therefore questionable, particularly at the expanded scale now proposed, where the extent of impermeable area and changes to overland flow routes would be materially greater.

Overall, the pattern of uniformly high scores gives the impression that the SHELAA assessment has not been sufficiently updated to reflect current application evidence, consultee positions and known delivery uncertainties, or that it relies too heavily on optimistic assumptions rather than secured and demonstrable solutions. The Council should revisit the SHELAA scoring for Site 11c using the most up to date information, transparently explain the evidence relied upon for each criterion, and apply a precautionary approach where key matters, notably access, land control and drainage, remain unresolved. Pending that reassessment, it is not reasonable to treat the site as low risk, early deliverable land for a major allocation at the scale now proposed.

Conclusion

The plan context, the settlement hierarchy and the Council's own evidence base do not support the very substantial enlargement of Site 11c now proposed. Bicknacre was originally identified for modest, proportionate growth, reflecting its limited services, facilities and transport provision. Recasting it as the focus for a major village extension of around 250 dwellings represents a marked and unexplained departure from that strategy. It would amount to a fundamental change in the role, scale and character of the settlement that sits uneasily with the spatial approach set out elsewhere in the plan.

The Integrated Impact Assessment confirms that an enlarged Site 11c is a constrained and sensitive location. It records negative or uncertain effects for biodiversity, the water environment, cultural heritage and land use, and only mixed performance for key objectives such as the economy, sustainable living, health and transport. Those conclusions reflect the site's proximity to Thrift Wood SSSI and other priority habitats, its relationship with Bicknacre Priory Scheduled Monument and nearby listed buildings, its greenfield

agricultural status and its location adjacent to a water body. They are reinforced by the detailed concerns in relation to landscape and settlement character, highways and transport, flood risk and drainage that have been consistently raised through consultation and at application stage.

At the same time, the Additional Sites IIA clearly identifies more sustainable alternatives. In particular, the former Kay Metzeler site at Brook Street and other urban or urban edge opportunities perform materially better across multiple objectives, without the same concentration of environmental and heritage constraints. Within the preferred Option 1 strategy of additional small and medium sites, there is no evidential basis for selecting a large, environmentally sensitive greenfield extension at Bicknacre in preference to higher scoring brownfield and better located sites. To do so ignores reasonable alternatives that would deliver comparable housing numbers with fewer adverse impacts.

In these circumstances, the decision to retain Site 11c at a capacity of around 250 dwellings cannot be regarded as justified or as the most appropriate strategy when considered against reasonable alternatives. Nor can it be said to represent an effective or environmentally responsible way of restoring the five year housing land supply, or a spatial distribution of growth that is consistent with national policy on focusing development on urban areas, larger settlements and sustainable locations. The allocation in its current form therefore fails the tests of soundness, particularly in relation to justification, effectiveness and consistency with national policy.

The appropriate course is for the Council to remove the enlarged allocation at Site 11c from the plan and to re-balance the Additional Sites package so that additional capacity is focused on higher performing brownfield and urban edge sites, together with modest uplifts at strategic locations with stronger infrastructure. If, notwithstanding the concerns set out above, any development at Bicknacre is to be pursued, it should be limited to a genuinely small scale, more closely aligned with the Preferred Options position, and subject to stringent requirements to protect biodiversity, the water environment, heritage assets, landscape and the character and function of the village. Retaining a 250 dwelling allocation in this sensitive rural location is not a sound or sustainable basis for the emerging Local Plan.)

Question 3

The Council's SHELAA scoring for Site 11c appears to assign uniformly high ratings (5) across key deliverability and constraints criteria, including vehicle access, land ownership, legal constraints, viability, deliverability timescale, archaeological assets and flood risk. In the context of the known and unresolved issues affecting this site, that outcome gives rise to concerns that the methodology has not been applied in a sufficiently evidence led or precautionary way. The resulting scores appear to understate both delivery risk and the scale of constraint.

Access and deliverability assumptions are not robust. A score of 5 for vehicle access and deliverability is difficult to reconcile with the acknowledged uncertainty over the site's principal access, including the potentially unresolved ownership of the strip of land required to implement the proposed entrance. The existence of a ransom strip type issue is not a minor detail, as it goes to whether a lawful, implementable access can be secured at all, and if so on what timescale and at what cost. Reliance on an indemnity insurance policy does not resolve the fundamental planning and delivery risk, particularly where the ability to deliver the access is outside the control of the promoter. These factors indicate a material uncertainty that should be reflected in the scoring, rather than treated as neutral.

The scoring appears to discount live highways concerns and an evolving access strategy. The emerging Local Plan position refers to access via Barbrook Way and/or Priory Road, yet the position described to residents is that the sole operational access would be via Barbrook Way, with construction traffic routed separately via Priory Road because Barbrook Way is not suitable for construction traffic. This reinforces that access is not straightforward and remains contested in principle and detail. It is also recorded that the highway authority had not responded to the outline application because additional time was required to consider local concerns and implications, and that access is likely to be critical to whether the scheme is approved. Against that background, a maximum score for vehicle access, legal constraints and deliverability timescale appears unsupported and premature.

Environmental and heritage constraints do not appear to have been properly translated into the scoring. A score of 5 for archaeological assets is difficult to justify where statutory consultee concerns have been raised and additional survey work has been requested, and where wider heritage related sensitivities in the locality are being actively evidenced. Where the evidence base is incomplete and further survey requirements are known, scoring should reflect uncertainty and the potential for mitigation led reductions in developable area or capacity, rather than assuming no constraint.

Flood risk and drainage constraints appear understated. Localised surface water flooding at and near the site entrance has been identified by residents. Concerns have also been raised that the preliminary concept work does not demonstrate clear, deliverable mitigation in the location where problems are experienced. A maximum score for flood risk constraints is therefore questionable, particularly at the expanded scale now proposed, where the extent of impermeable area and changes to overland flow routes would be materially greater.

Overall, the pattern of uniformly high scores gives the impression that the SHELAA assessment has not been sufficiently updated to reflect current application evidence, consultee positions and known delivery uncertainties, or that it relies too heavily on optimistic assumptions rather than secured and demonstrable solutions. The Council should revisit the SHELAA scoring for Site 11c using the most up to date information, transparently explain the evidence relied upon for each criterion, and apply a precautionary approach where key matters, notably access, land control and drainage, remain unresolved. Pending that reassessment, it is not reasonable to treat the site as low risk, early deliverable land for a major allocation at the scale now proposed.

Question 4 - Executive Summary

This representation is submitted on behalf of concerned local residents of Bicknacre who object to the proposed designation of Strategic Growth Site Policy 11c, Land West of Barbrook Way, Bicknacre, for around 250 dwellings and associated uses in the Focused Consultation Additional Sites (Regulation 19) document.

The allocation is not sound because it is not justified, in that it is not the most appropriate strategy when considered against reasonable alternatives, including other additional sites and brownfield opportunities that perform better in the Integrated Impact Assessment. It is not effective, as it would impose a disproportionate scale of growth on a small village with limited infrastructure and poor sustainable transport choices, contrary to the settlement hierarchy. It is also not consistent with national policy, particularly the requirement

to focus significant development on locations that are or can be made sustainable, and to protect and enhance valued landscapes, biodiversity, best and most versatile agricultural land, and the historic environment.
Accordingly, the allocation should be reverted to a modest capacity more in line with the earlier Pre Submission allocation of around 20 dwellings on a small part of the site.

Attachment/s

[Local Plan Rep - Barbrook Way.pdf](#)

ID	ASIIA-41
Person ID	1392184
Full Name	
Company / Organisation	M Scott Properties Ltd
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Section 2.3
Question 1	No
Question 2 - Please provide an explanation below:	<p>The IIA identifies two options for appraisal: Option 1 entails allocation of the sites proposed at the Regulation 19 iteration of the DLP, but increasing capacities, and additional allocation of small sites. Option 2 comprises allocation of the same sites proposed in the Regulation 19 DLP, plus allocation of an additional strategic site or sites.</p> <p>The IIA includes an assessment of existing proposed allocations in the original Reg 19 plus the Option 1 sites; and an assessment of the existing proposed allocations in the original Reg 19 plus the Option 2 sites.</p> <p>Option 1 is selected as the proposed approach for the following reasons:</p> <p>It complies well with the Local Plan's Strategic Priorities, Vision and Spatial Principles.</p> <p>It is in accordance with the settlement hierarchy.</p> <p>It performs well in respect of housing, and the economy and employment, and relatively well in respect of sustainable living and revitalisation, health and wellbeing, and transport.</p> <p>It makes the best use of existing and proposed infrastructure capacity.</p> <p>It includes employment sites.</p> <p>Sites are expected to be delivered within the first five years of the Plan.</p> <p>The IIA explains that Option 2 is rejected for the following reasons</p> <p>It deviates from the Local Plan's Strategic Priorities, Vision and Spatial Principles.</p> <p>It is not in accordance with the settlement hierarchy</p> <p>It performs relatively poorly in respect of economy, sustainable living, health and wellbeing and transport.</p> <p>Transport and other infrastructure requirements are unproven.</p> <p>Deliverability cannot be relied upon within the first five years of the Plan, due to the sites being part of larger development areas</p> <p>There are a number of concerns with these conclusions and the purported justification for selecting Option 1.</p> <p>Firstly, it appears to treat all sites within Option 1 as being of equal sustainability and applies blanket conclusions to a basket of sites of varying characteristics, located in various parts of the authority, and providing extensions to different settlements at various positions in the settlement hierarchy.</p> <p>In terms of compliance with the Local Plan's Strategic Priorities, Vision and Spatial Principles, it is notable that, as per Strategic Policy S1, such spatial principles include, inter alia:</p> <p>Locating development at well-connected and sustainable locations;</p> <p>Continuing the renewal and enhance the vitality of Chelmsford City Centre and its Urban Area;</p> <p>Focussing development at the higher order settlements outside the Green Belt and respecting the development pattern and hierarchy of other settlements;</p> <p>Ensuring development is served by necessary infrastructure and encouraging innovation.</p> <p>Clearly there are some sites within Option 1 that contribute significantly less than others to these objectives. Similarly, and perhaps of more relevance, there are sites that have been included within Option 2 that contribute better to the DLP's proposed Strategic Priorities, Vision and Spatial Principles.</p>

	<p>We also therefore at this point reiterate Scott Properties previous representations which proposed updates to Strategic Policy S1 to direct development to all higher order settlements, as opposed to only those outside of the Green Belt.</p> <p>The conclusion that smaller sites are inherently in accordance with the settlement hierarchy, whilst those in Option 2 are not, is entirely spurious. Sites within Option 1 include those in less sustainable locations or with overall lower SHELAA scores than sites discounted with the dismissal of Option 2, or due to their location within the Green Belt.</p> <p>Further to the above, land north of Margaretting does not appear to have been included within either option, again negating its consideration for allocation as part of this further site assessment process.</p> <p>Whilst the allocation of additional sites demonstrates an ability for the Council to demonstrate appropriate land availability for housing delivery to meet identified needs, we do not consider for this additional process to have resolved outstanding issues in relation to the soundness of the Plan as a result of the lack of consideration given to the review of Green Belt and opportunities for growth at sustainable settlements situated in the Green Belt.</p> <p>It is therefore not considered that the additional sites allocation process has been appropriately justified or positively prepared, nor does it reflect the latest national policy position in relation to opportunities for development in the Green Belt (NPPF Paras 145 to 149), or in turn the NPPF's continued support for the sustainable growth of rural settlements.</p> <p>(Complete representation attached 1392184AS-A)</p>
<p>Question 4 - Executive Summary</p>	<p>It is therefore not considered that the additional sites allocation process has been appropriately justified or positively prepared, nor does it reflect the latest national policy position in relation to opportunities for development in the Green Belt (NPPF Paras 145 to 149), or in turn the NPPF's continued support for the sustainable growth of rural settlements.</p>
<p>Attachment/s</p>	<p>1392184AS-A.pdf</p>

ID	ASIIA-25
Person ID	1397877
Company / Organisation	Marriage Family
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	General comment
Question 2 - Please provide an explanation below:	<p>Please see attached (The Marriage Family is promoting residential development of Land at Patching Hall Lane, Broomfield ('the Site'), and is in advanced discussions with a prospective developer to take forward its promotion.</p> <p>(Additional detail on the Site and in respect of Policy S7 in attachment 'Chelmsford LP Reg 19 Addendum - Marriage Family - Patching Hall Lane')</p> <p>The IIA and consideration of options</p> <p>3.34 The SEA Regulations¹ require that for plans such as the eLP, an Environmental Report is prepared.</p> <p>3.35 In respect of the eLP, the IIA fulfils this requirement. The Addendum is accompanied by an IIA ('the Addendum IIA').</p> <p>3.36 In addition to legal compliance, sustainability appraisal is an important tool in demonstrating Local Plans are sound. The NPPF (paragraph 32) explains that a sustainability appraisal that meets the relevant legal requirements (i.e. the SEA Regulations) should inform Local Plans throughout their preparation, and demonstrate how Local Plans have addressed relevant economic, social and environmental objectives.</p> <p>3.37 The SEA Regulations require the Environmental Report to identify, describe, and evaluate the likely significant effects on the environment of proposed options, as well as on reasonable alternatives (Regulation 12(2) of the SEA Regulations).</p> <p>3.38 The SEA Regulations (Regulation 16) also require the Environmental Report to, ultimately, explain the reasons for selecting options and rejecting others.</p> <p>3.39 We have significant concerns with how the options considered by the IIA have been derived, and how they have been appraised, having regard to reasonable alternatives.</p> <p>The Addendum IIA identifies two options for appraisal: Option 1 entails allocation of the sites proposed in the original Regulation 19 eLP, expanding certain proposed allocations, alongside the allocation of a number of smaller sites (defined in this instance as sites that will deliver no more than 500 homes).</p> <p>3.41 Option 2 comprises allocation of the same sites proposed in the Regulation 19 eLP, plus allocation of an additional strategic site or sites.</p> <p>3.42 Firstly, we note that the Site has not been considered as part of Option 1, despite it having a capacity of fewer than 500 homes, it being a deliverable site (as confirmed by the SHELAA), and corresponding well with the settlement hierarchy and spatial principles of the eLP.</p> <p>3.43 Indeed, it is unclear how this range of sites that comprise Option 1 have been determined, or why such a diverse range of sites in varying locations and of differing characteristics have been grouped together as a single option.</p> <p>3.44 The Addendum IIA purports to compare Option 1 with Option 2, and explains Option 1 is selected as the proposed approach for the following reasons:</p> <p>It complies well with the Local Plan's Strategic Priorities, Vision, Spatial Principles.</p> <p>It is in accordance with the settlement hierarchy</p> <p>It performs well in respect of housing and economy and employment, and relatively well in respect of sustainable living and revitalisation, health and wellbeing, and transport</p> <p>It makes the best use of existing and proposed infrastructure capacity</p> <p>It includes employment sites</p> <p>Sites are expected to be delivered within the first five years of the Plan.</p> <p>3.45 The IIA explains Option 2 is rejected for the following reasons:</p> <p>It deviates from the Local Plan's Strategic Priorities, Vision, Spatial Principles</p> <p>It is not in accordance with the settlement hierarchy</p> <p>It performs relatively poorly in respect of economy, sustainable living, health & wellbeing and transport</p>

Transport and other infrastructure requirements are unproven

Deliverability cannot be relied upon within the first five years of the Plan, due to being part of larger development areas.

As purported justification for selecting Option 1 over Option 2, the above does not bear scrutiny.

3.47 The basket of sites that comprise Option 1 include those of varying characteristics, located adjoining settlements at varying positions in the settlement hierarchy, and in locations of varying sustainability to accommodate residential development. It is far from clear on what basis the Addendum IIA has reached conclusions regarding these sites and their relationship with the settlement hierarchy, or with the eLP's vision, spatial principles and objectives. Similarly, it is unclear how it can be reasonably concluded that the sites make best use of existing and proposed infrastructure capacity, given the diverse nature of those included within Option 1.

3.48 Furthermore, it is notable that all of the reasons given for selecting Option 1 would also apply to the Site, with the exception of the inclusion of employment sites. But then there is no reason why the employment site included within Option 1 and the Site could not both be allocated. They are certainly not mutually exclusive. In any case, there is nothing to suggest the employment expansion proposed in the Addendum is in any way related to the various residential allocations that make up Option 1 – the deliverability and sustainability of the additional employment land appears to be the same whether or not it comes forward with the Option 1 residential sites.

3.49 The problems with the IIA, we suggest, largely stem from the way that sites have been grouped together. A more effective approach, one that would ensure a robust appraisal of reasonable alternatives and the findings appropriately considered, would be to undertake an appraisal of the various potential sites against the sustainability objectives and to compare the findings between the different sites, rather than between two arbitrarily defined options.

3.50 The judgment in

Cogent

2 makes clear that the Strategic Environmental Assessment is an iterative process, and defects in earlier stages can be resolved at the later stage (even at very late stage in the process).

3.51 The issues with the IIA do not need to be fatal to the eLP. We suggest it will be necessary for the Council to revisit the IIA, in particular in respect of its approach to identifying and appraising reasonable alternatives. It will then be necessary for the eLP to be updated to reflect the findings of the amended IIA, in order to ensure compliance with the SEA Regulations. As the judgment in Cogent confirms, whilst issues with the Strategic Environmental Assessment process can be addressed at the latter stages of a plan's preparation, the exercise of doing so must not simply be an ex post facto one that merely confirms a strategy already agreed. Instead, the Council will need to remain open to amending the eLP to reflect the findings of further iterations of the IIA.

The identified issues with the IIA are also relevant to the soundness of the eLP, and will be necessary to address in order to ensure the eLP is justified and consistent with national policy.

ADDENDUM SITES

4.1 In addition to concerns with the approach taken by the Addendum generally, we have specific concerns with particular Addendum Sites proposed to be allocated / expanded.

4.2 The following proposed additional or expanded allocations proposed by the Addendum are discussed in this section of our representations:

SGS11c Land west of Barbrook Way, Bicknacre – expanded allocation from 20 dwellings to 250

SGS14b Land south of Ford End Primary School, Ford End – expanded allocation from 20 dwellings to 75

SGS17c Land South of Rough Hill Complex, East Hanningfield – new allocation of 115 dwellings

SGS17d Land South and South East of East Hanningfield Village – new allocation of 150 dwellings

GS17e Land South of Windmill Farm, Back Lane, East Hanningfield – new allocation of 40 dwellings

SGS20 Land to East and North of Rettendon Place – new allocation of 350 dwellings.

4.3 The above are considered in turn, below.

Proposed Allocation SGS11c – Land west of Barbrook Way, Bicknacre

4.4 The Addendum includes proposed expanded allocation of SGS11c to accommodate 250, as opposed to 20, dwellings for a site located to the west of the village of Bicknacre. A 1,250% increase, and a vastly greater degree of growth now for the village, than proposed through the Regulation 19 eLP.

4.5 The eLP states that Bicknacre is a second-tier settlement (Key Service Settlement) in the settlement hierarchy. Whilst only one tier below Chelmsford, not all settlements within the same tier of the hierarchy will be equally sustainable to accommodate growth. Bicknacre has fundamentally different characteristics to both Chelmsford and Broomfield, and is a far less sustainable location to which to direct significant scale growth.

The built-up area of Bicknacre has a population of c.2,300. The village is part of the Parish of Woodham Ferrers and Bicknacre, the population of which as estimated by the 2021 Census was just under 3,000.

4.7 The village has a primary school, village hall and modest local shopping provision, with residents relying on higher-order centres such as Chelmsford and South Woodham Ferrers for most jobs, secondary education, major retail, leisure and healthcare, reinforcing its functional dependency and commuter role.

4.8 It does not benefit from a railway station or immediate proximity to any strategic highway links.

4.9 Whilst it is appreciated that Bicknacre is suitable for proportionate growth to support and enhance the vitality of its community, when the Council is faced with the need to identify additional land to accommodate housing to address sites not coming forward as anticipated – sites principally located in and around Chelmsford – it is far from clear what justification there is for significantly increasing the level of growth being direct to this one site in a village that is manifestly far less sustainable than Chelmsford to accommodate growth.

4.10 There is no evidence to suggest that the village requires such an increase in housing to support its vitality, or the scale of growth the Regulation 19 eLP proposed for the village was not appropriate.

4.11 It is considered neither justified nor consistent with national policy to direct additional growth on top of that the Regulation 19 eLP already proposed to SGS11c.

SGS14b Land south of Ford End Primary School, Ford End

4.12 SGS14b Ford End lies on the B1008 roughly midway between Chelmsford and Great Dunmow and comprises just over 150 houses, with an estimated population of c.730 in 2018, indicating a very small village scale.

4.13 In this context, even the provision of 20 homes to this village when alternative options at higher tier settlements were available might have been considered challenging to justify and to demonstrate as being sustainable. Nevertheless, it is accepted that there may be a case for directing this level of growth to Ford End in order to support the vitality of the village.

4.14 However, the Addendum's proposal to increase this level of growth from 20 dwellings to 75 is clearly unjustified given alternative options available to the eLP.

4.15 The eLP proposes Ford End be designated a third-tier settlement in the settlement hierarchy. The village has limited local services, which include a primary school, village hall, and church.. Most residents are dependent on larger centres for employment, secondary education, major retail, healthcare and most leisure.

4.16 In terms of residents' ability to access these services via alternatives to the private car, Ford End has no railway station and only limited bus services. Directing additional growth to this location, when alternatives far better related to sustainable transport opportunities are available, is not only contrary to the NPPF but also conflicts with Strategic Policy S1's aspirations to create development that is accessible by a variety of forms of transport having regard to the modal hierarchy (at which private car is at the bottom).

4.17 As with the proposal to significantly increase the number of homes being directed to SGS11c, there are clear soundness issues with seeking to take a similar approach with this site. The characteristics of Ford End and the availability of more sustainable alternatives elsewhere do not support such an approach.

SGS17c, SGS17d, and GS17e at East Hanningfield

4.18 SGS17c, SGS17d, and GS17e propose a total of 305 additional dwellings be directed to the village of East Hanningfield. Combined with proposed allocations in the Regulation 19 eLP, this would result in a total of 336 homes being directed to what is identified by the eLP as a tier 3 settlement in the settlement hierarchy.

4.19 The Regulation 19 eLP proposed a total of 31 dwellings be directed to the village through new allocations. The Addendum represents a 1,083% increase in the number of new homes proposed for East Hanningfield.

4.20 East Hanningfield Parish as a whole has a total population of only c.1,100. The provision of 336 homes here would evidently have a significant impact on the character of East Hanningfield, and it is doubtful such a level of growth would be consistent with the eLP spatial strategy's proposal to utilise the settlement hierarchy to help determine appropriate levels of growth.

4.21 The village itself benefits from a primary school, village hall and some community facilities. But residents are largely reliant on Chelmsford for employment, secondary education, hospitals, major retail, leisure, etc. East Hanningfield has few employment opportunities within the village and immediate vicinity, generally limited to village services, farming and small businesses, with most working residents commuting to Chelmsford or further afield.

Furthermore, in terms of the accessibility of services, facilities and employment opportunities, the village lacks a railway station and has infrequent bus links. As with Bicknacre and Ford End, residents of East Hanningfield are heavily on use of the car to meet day-to-day needs.

4.23 The proposed allocation of SGS11c, SGS11d, and GS11e needs to be seen in the context of reasonable alternatives, more sustainably located, being available and having been rejected by the eLP.

4.24 The Site (Land at Patching Hall Lane, Broomfield) provides an example of where a similar scale of growth could have been directed to a manifestly more sustainable location. Notably whilst the Site was rated as 'green' (deliverable, i.e. suitable, available and achievable) by the SHELAA, the three proposed new allocations at East Hanningfield were each rated 'amber', i.e. each scored less well against suitability criteria than or had some characteristics contrary to local policy and face moderate constraints that would require mitigation. In short, each is less deliverable than sites rated 'green' or 'yellow'.

SGS20 Land to East and North of Rettendon, Rettendon Place

4.25 The Regulation 19 eLP did not propose any growth of the village, proposing no new allocations for Rettendon Place. The eLP suggests it is a Service Settlement (tier 3) in the settlement hierarchy.

4.26 The Addendum's proposed allocation of 350 dwellings to Rettendon Place through SGS20 clearly represents a fundamentally different approach to the village, and indicates an alternative spatial strategy being pursued to that in the Regulation 19 eLP.

4.27 The village forms part of Rettendon Parish, which comprises a dispersed collection of dwellings clustered along the old A130 and has a population of just under 2,000. However, there is a lack of any Census data of the population of the built-up area of Rettendon Place itself.

4.28 The village has limited services and facilities. It benefits from the A130 being readily accessible to it, but encouraging the use of the private car is contrary to both the NPPF and the aspirations of the eLP.

4.29 The SHELAA considered two sites described as Land East and North of Rettendon Place (15SLAA40 and CFS232). Both were rated 'amber', i.e. less deliverable than sites rated 'green' or 'yellow'. There are alternative sites available which adjoin more sustainable locations and which the Council's own evidence base suggests are more suitable, which have been rejected in favour of SGS20.

The Addendum's proposed allocation of SGS20 is neither justified nor consistent with national policy. Insofar as concerns policies in the eLP which seek to direct growth to sustainable locations, and encourage greater use of more sustainable modes of transport, the proposed allocation is not effective either.

Overview of Addendum Sites

4.31 The above Addendum Sites proposed for allocation all seek to direct growth to lower tier settlements in the borough. Such settlements may be suitable for modest growth in order to help sustain services and facilities, and support their vitality. But they are not considered sustainable for levels of growth that the Addendum proposes, particularly when seen in the context of more sustainable, deliverable, alternatives that have been rejected in favour of these sites.

4.32 The proposed approach is not justified; is not effective (in that it results in internal inconsistencies within the eLP and fails to accord with proposed spatial principles); and fails to ensure the eLP will deliver sustainable development, rendering it contrary to the NPPF.

OVERVIEW AND CONCLUSION

5.1 The Council's approach of seeking to increase the number of new homes the eLP will deliver above that proposed by the Regulation 19 Addendum is necessary and welcomed.

5.2 However, the Addendum fails to ensure the eLP will be capable of being found sound, for the reasons set out within this representation.

5.3 The reasons for this are, in overview, that Addendum's unjustified focus on sites in lower tiers of the settlement hierarchy, contrary to the eLP's own proposed strategy, without justification and leading to a less sustainable pattern of growth than reasonable alternatives.

5.4 The lack of justification is compounded by defects within the IIA, which fails to properly consider reasonable alternatives and instead presents a false choice between two arbitrarily defined options.

5.5 We urge the Council to revisit its approach to modifying the Regulation 19 eLP to make it capable of being found sound. The Site is a deliverable alternative to many of those proposed by the Addendum. Its allocation for residential development would be justified, sustainable and consistent with the proposed spatial strategy and spatial principles. Its allocation would contribute to a sustainable, sound, eLP.)

Question 4 - Executive Summary	Please see attached (nothing explicit noted in attachment 'Chelmsford LP Reg 19 Addendum - Marriage Family - Patching Hall Lane' in this respect)
Attachment/s	Chelmsford LP Reg 19 Addendum - Marriage Family - Patching Hall Lane.pdf (1)

ID	ASIIA-40
Person ID	1327864
Full Name	
Company / Organisation	Martin Grant Homes
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	
Question 3	<p>Housing Needs and Requirement</p> <p>Whilst the Council has correctly recognised the most recent standard method calculation (1,437dpa) the evidence base has not been updated to reflect this or the implications of not meeting this (if that is the case). The standard method figure represents minimum housing needs.</p> <p>In respect of the housing requirement, the current consultation does not seek to rectify the deficiencies of the draft Plan. The housing requirement remains 1,210 dwellings per annum, only 84% of the identified housing needs figure.</p> <p>The Pre-Submission Integrated Impact Assessment (January 2025) discounts a higher growth scenario on the basis it “was not available in sufficient time for consideration through this report”. The Integrated Impact Assessment (IIA): Focused Consultation Additional Sites (Regulation 19) Addendum (November 2025) does not consider this “higher growth” scenario 2 further despite the time that has now passed since the new standard method calculation came into effect.</p> <p>We therefore remain concerned the Council has not considered a strategy which could, as a minimum, meet the area’s objectively assessed needs. Based on the evidence base, there are other site which are considered suitable (i.e. Land at Little Fields, Danbury) which should be allocated to reduce the deficit between the housing requirement and minimum housing needs.</p>

ID	ASIIA-5
Person ID	1358507
Full Name	
Company / Organisation	National Trust
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Biodiversity and Geodiversity
Question 2 - Please provide an explanation below:	<p>The National Trust was founded in 1895 as an independent charity to hold and manage, in perpetuity for the benefit of the nation, countryside and historic buildings in England, Wales and Northern Ireland. The Trust fulfils its statutory responsibilities as laid down in the National Trust Acts, through ownership and direct management of the properties in its care. It is within the remit of the National Trust to comment where development proposals may affect our land or property, or other special places.</p> <p>The Trust's People and Nature Thriving: Our Strategy 2025 to 2035, has at its core three ambitious 2050 goals: to restore nature, to end unequal access to nature, beauty and history, and to inspire millions more people to care and take action. We will work towards achieving these over the next decade.</p> <p>The National Trust supports a plan led approach to new development. We acknowledge the Spatial Strategy set out in the Focused Consultation (Additional Sites) Regulation 19 Document in order to meet an identified housing need.</p> <p>Blake's Wood and Lingwood Common (located to the north of Danbury), together with Danbury Common (located to the south of Danbury), are designated as Sites of Special Scientific Interest and are owned and managed by the National Trust. The sites are woodland areas with some visitor infrastructure. Taken as a whole the mosaic of habitats across Danbury Ridge including the National Trust sites, Essex Wildlife Trust Nature Reserves, and other land including ancient woodland and woodlands in ownership not accessible to the public, is an important landscape for wildlife which is more than the sum of its parts.</p> <p>Whilst Natural England assessed Danbury Common in 2018 as being at low risk of pressure from recreational disturbance, habitat impacts are apparent on site. There has been considerable growth in and around Chelmsford in the intervening years, the pandemic has changed how people interact with the outdoors, and further growth is due to take place across the plan period.</p> <p>The Integrated Impact Assessment (IIA007) high-level assessment of the plan states under the Biodiversity and geodiversity heading, consideration for several matters including Housing delivery, Spatial Strategy, and Policy S6 Housing and Employment Requirements there are unlikely to be direct effects on [designated sites] but that there could be indirect effects including from increased recreational activity. The scoring indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed in the colour used. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.</p> <p>As set out in our response to the full Pre-Submission Local Plan, we consider impacts on the SSSIs and Ancient Woodlands should be assessed at the Local Plan stage and scale, rather than for individual planning applications, so that cumulative impacts for the plan period can be adequately assessed and appropriate mitigation can be ensured. The sites identified in the focussed consultation document would further add to the cumulative pressure on the SSSIs from growth in the wider area.</p>
Question 3	We consider impacts on the SSSIs and Ancient Woodlands should be assessed at the Local Plan stage and scale, rather than for individual planning applications, so that cumulative impacts for the plan period can be adequately assessed and appropriate mitigation can be ensured.
Question 4 - Executive Summary	<p>Taken as a whole the mosaic of habitats across Danbury Ridge is an important landscape for wildlife which is more than the sum of its parts.</p> <p>We are concerned, that residential development on the sites identified in the focussed consultation document could indirectly impact the SSSIs through additional cumulative recreational pressure arising from growth in the wider area. We consider impacts on the SSSIs and Ancient Woodlands should be assessed at the Local Plan stage and scale, rather than for individual planning applications, so that cumulative impacts for the plan period can be adequately assessed and appropriate mitigation can be ensured.</p>
ID	ASIIA-9
Person ID	1358507
Full Name	
Company / Organisation	National Trust

<p>Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:</p>	<p>Biodiversity and geodiversity</p>
<p>Question 2 - Please provide an explanation below:</p>	<p>The National Trust was founded in 1895 as an independent charity to hold and manage, in perpetuity for the benefit of the nation, countryside and historic buildings in England, Wales and Northern Ireland. The Trust fulfils its statutory responsibilities as laid down in the National Trust Acts, through ownership and direct management of the properties in its care. It is within the remit of the National Trust to comment where development proposals may affect our land or property, or other special places.</p> <p>The Trust's People and Nature Thriving: Our Strategy 2025 to 2035, has at its core three ambitious 2050 goals: to restore nature, to end unequal access to nature, beauty and history, and to inspire millions more people to care and take action. We will work towards achieving these over the next decade.</p> <p>The National Trust supports a plan led approach to new development. We acknowledge the Spatial Strategy set out in the Focused Consultation (Additional Sites) Regulation 19 Document in order to meet an identified housing need. As set out in our response to the full Pre-Submission Local Plan, we consider impacts on the SSSIs and Ancient Woodlands should be assessed at the Local Plan stage and scale, rather than for individual planning applications, so that cumulative impacts for the plan period can be adequately assessed and appropriate mitigation can be ensured.</p> <p>We note, Land West of Barbrook Way, Bicknacre previously identified as a location for around 20 new homes, is now identified as a Strategic Growth Site for around 250 homes within the plan period.</p> <p>Draft Policy 11c requires development to assess, and where appropriate mitigate, the potential cumulative effect on the designated features of Thrift Wood SSSI.</p> <p>Blake's Wood and Lingwood Common (located to the north of Danbury), together with Danbury Common (located to the south of Danbury) around 1.2km from Site 11c, are designated as Sites of Special Scientific Interest and are owned and managed by the National Trust. The sites are woodland areas with some visitor infrastructure. Taken as a whole the mosaic of habitats across Danbury Ridge including the National Trust sites, Essex Wildlife Trust Nature Reserves, and other land including ancient woodland and woodlands in ownership not accessible to the public, is an important landscape for wildlife which is more than the sum of its parts.</p> <p>We are concerned, by the proximity of Site 11c to the Danbury Ridge SSSIs, which could indirectly impact the SSSIs through cumulative recreational pressure without appropriate mitigation measures.</p> <p>Whilst Natural England assessed Danbury Common in 2018 as being at low risk of pressure from recreational disturbance, habitat impacts are apparent on site. There has been considerable growth in and around Chelmsford in the intervening years, the pandemic has changed how people interact with the outdoors, and further growth is due to take place across the plan period.</p> <p>The Integrated Impact Assessment (IIA007) high-level assessment of the plan states under the Biodiversity and geodiversity heading, consideration for several matters including Housing delivery, Spatial Strategy, and Policy S6 Housing and Employment Requirements there are unlikely to be direct effects on [designated sites] but that there could be indirect effects including from increased recreational activity. The scoring indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed in the colour used. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.</p>
<p>Question 3</p>	<p>The wording of Policy 11c Site Masterplanning Principles – Historic and Natural Environment, and Site Infrastructure Requirements, should include requirements relating to the Danbury SSSIs and be consistent with Strategic Growth Site Policy 13 – Danbury, in addition to the requirements relating to Thrift Wood SSSI.</p> <ul style="list-style-type: none"> • Conserve and enhance the Sites of Special Scientific Interest (SSSI) in and around Danbury (Blake's Wood and Lingwood Common SSSI, Woodham Walter Common SSSI and Danbury Common SSSI) ensuring any new development avoids direct impacts and mitigates indirect impacts (i.e. recreational damage) as a priority and provides any required mitigation measures where necessary (including those set within any emerging visitor impact studies / strategic solutions). • Contributions towards addressing cumulative recreational pressure on SSSIs in proximity to the site.
<p>Question 4 - Executive Summary</p>	<p>Taken as a whole the mosaic of habitats across Danbury Ridge is an important landscape for wildlife which is more than the sum of its parts.</p> <p>We are concerned, that residential development at Bicknacre could indirectly impact the SSSIs through cumulative recreational pressure without proper assessment and appropriate mitigation measures.</p>

ID	ASIIA-47
Person ID	1249937
Full Name	
Company / Organisation	Natural England
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	General comment and Appendix F regarding HRA
Question 2 - Please provide an explanation below:	<p>Assessment of additional sites, Strategic Policies and cumulative effects</p> <p>We have not reviewed this section or the wider Integrated Impact Assessment (IIA) in detail. Our advice on the additional site allocations above (See attachment: 970344AS-A.pdf) should be appropriately reflected in the report.</p> <p>Habitats Regulations Assessment report</p> <p>We note that the HRA Report Addendum presented in Appendix F of the IIA considers the proposed changes arising from the publication of the Council's Focused Consultation Additional Sites (Regulation 19) Document. The HRA Addendum concludes that the proposed changes to the Local Plan do not affect the findings of the previous HRA work (presented in Appendix N of the Pre-Submission IIA Report) and that the Local Plan will not have adverse effects on any European sites either alone or in combination. Natural England will be able to support this conclusion once all the additional site allocations with the ZoI for Essex RAMS have been acknowledged and appropriate requirements included within the relevant site allocation policies, in line with our advice above (See attachment: 970344AS-A.pdf).</p> <p>(Complete representation from Natural England attached - 970344AS-A.pdf)</p>
Attachment/s	970344AS-A.pdf

ID	ASIIA-52
Person ID	1303557
Full Name	
Company / Organisation	Obsidian Strategic
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	General comment
Question 2 - Please provide an explanation below:	<p>Obsidian Strategic controls approximately 9.2 hectares (22.6 acres) of land west of Galleywood Road, on the south-eastern edge of Chelmsford's urban area. The land lies directly adjacent to Great Baddow High School and its allocation for development in the emerging Local Plan would present a unique opportunity to help address Chelmsford's Housing Crisis in a highly sustainable location, whilst supporting the future expansion and enhancement of educational facilities at Great Baddow High School.</p> <p>1.3 We are urging the Council to reconsider its blanket approach to ruling out the opportunity to deliver sustainable development in the Green Belt and to carefully consider the unique set of benefits that would be afforded by allowing the release of land in Great Baddow.</p> <p>1.4 Whilst Obsidian Strategic welcomes the Council's recognition that further site allocations are required to enhance its five-year housing land supply, in addition to its ongoing objections about the lack of consideration for Green Belt release it has remaining concerns about the soundness of the Plan in respect of:</p> <p>Insufficient housing supply allocations to ensure that the housing requirement is met in full, taking account of the limited buffer proposed.</p> <p>Over optimistic assumptions about the likely delivery timeframes for the draft Plan's main allocation - the 3,000 new homes expected to come forward at Hammonds Farm.</p> <p>Significant risks associated with the delivery of a new settlement at Hammonds Farm, including the substantial upfront highways and other infrastructure required to enable the development to come forward and the risks presented by the Government's decision to cancel planned A12 upgrades.</p> <p>The justification for the allocation of a new settlement east of Chelmsford compared with the reasonable alternatives, including further allocations on the edge of Chelmsford's urban area.</p> <p>Strategic Policy S7 – The Spatial Strategy</p> <p>2.15 Whilst Obsidian supports the broad thrust of Strategic Policy S7's approach, including its recognition of the roles of Chelmsford and South Woodham Ferrers at the top of the Settlement Hierarchy and the main areas of focus for growth in the Local Plan, it maintains an objection to the justification for a new settlement to the East of Chelmsford, taking account of the reasonable</p>

alternatives. These include the allocation of further urban extensions on the edge of the urban area. We refer the Council and the Inspector to objections made to the previous Regulation 19 consultation, which remain valid.

2.16 Obsidian's concerns are exacerbated by the reliance of the Spatial Strategy on Junction 19 of the A12. This is a significant deliverability risk, due to the Government's decision to cancel planned improvements to the A12 that would have delivered required capacity. The Local Plan's traffic modelling concludes that the full improvements that were proposed to Junction 19 are required as a minimum to deliver the strategic growth expected by the Local Plan. Whilst discussions are on-going with National Highways to look at options for a phased approach to works to the junction to support the proposed Local Plan growth, but no outcome has yet been reached.

2.17 Furthermore, the evidence base supporting the draft Plan has not been sufficiently updated to justify the decision to allocate Hammonds Farm in favour of other options that are better connected to existing services. The Integrated Impact Assessment (IID) supporting the previous Regulation 19 consultation did not assess the potential benefits of further allocations north of smaller sites adjacent to existing higher order settlements. It stated simply at 6.4.41 that: "It was not considered appropriate to try to meet the remaining residual needs through a selection of additional small sites.

Over 90 small sites were submitted for consideration for development. More than half have been discounted because they are in the Green Belt or Green Wedge. Many other sites are unsuitable for a number of reasons, such as due to not meeting other Local Plan policies on a wide range of issues, being in an unsustainable location, being distant from defined settlements, or other factors including topology.

A number of smaller site allocations are allocated but attempting to meet residual needs would not be feasible due to the lack of site supply. Even if this could be accommodated, it would not be a balanced strategy. While the smaller sites could potentially deliver faster than the large scale sites, they would not deliver the same benefits in terms of new or improvements to existing community services and facilities. Some of the smaller sites being allocated form part of a larger promoted area, where a larger allocation may not be appropriate for the settlement due to issues such as access, surrounding density and character, along with not helping the Council to meet the 10% small sites target."

2.18 The update to IID supporting the Additional Sites consultation does not do so either. It only assesses the option of allocating a single strategic site (or sites) as a reasonable alternative. It does not assess the potential benefits of allocating further smaller sites to boost housing supply further.

Obsidian's land off Galleywood Road, Great Baddow does not therefore appear to have been properly considered, despite the fact it is in a highly sustainable location on the edge of the urban area of the largest settlement in the Plan area, is easily deliverable within the Plan period and could deliver substantial community benefits, as per the proposals put forward by Obsidian.

2.20 The Council and the Inspector must consider the benefits of development on the site further, as

	part of a wider assessment of reasonable alternatives (including Green Belt release), before the Plan can be found sound. (Complete representation attached - 1303557AS-A)
Attachment/s	1326599AS-A.pdf 1303557AS-A.pdf

ID	ASIIA-29
Person ID	1397209
Full Name	Mr Sean O'Donnell
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	IIA options
Question 2 - Please provide an explanation below:	The document is flawed for a number of reasons. First, it is not reasonable to consider just two options only when other options are possible, such as a mix of smaller development site(s) plus at least one strategic site. Second, the document appears to have pre-determined the outcome that option 1 is the preferred solution as there is a mismatch in the significant detail in the document on the preferred sites compared with much less detail on alternative sites. This makes it difficult to compare like with like and thus unreasonably puts any consultee at a disadvantage. Third, the outcome that option 1 is the preferred solution is worded to suggest that this is clear cut. Yet the basis for this is marginal at best, for example, where there are differences between options 1 and 2, the report identifies that on three aspects only, option 2 "the approach detracts from the achievement of the objective but not significantly" compared with option 1. This is not a strong enough argument to go forward on option 1 only.
Question 3	That other options are considered and that a more detailed analysis is undertaken to determine which options or mix of options most clearly meet the objectives for making the Local Plan compliant. The current superficial analysis raises a concern that any decision is pre-determined.

ID	ASIIA-27
Person ID	1398045
Full Name	
Company / Organisation	This Land
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Sections 2.3 and 3
Question 1	No
Question 2 - Please provide an explanation below:	<p>Please refer to accompanying representations. (The DLP Addendum seeks to identify additional sites for residential and employment development, noting that some sites in the adopted Local Plan have not come forward or will be delivered more slowly than anticipated. This Land supports the principle of allocating additional sites, which will help ensure the Local Plan is effective, positively prepared, and consistent with national policy.</p> <p>We note that the Council's August 2025 reassessment of the five-year housing land supply concludes that Chelmsford cannot demonstrate a five-year supply under national policy due to delays in strategic site delivery and the cancellation of the A12 widening scheme. The Cabinet report identifies this as a key trigger for reconsidering the soundness of the Draft Local Plan consulted on at Regulation 19 earlier in 2025. The rapid emergence of this issue—within six months of the publication of a plan designed to guide development for at least 15 years—underscores the need for the DLP to be flexible and capable of responding to changing circumstances. This will help minimise the risk of the Council being unable to demonstrate a five-year housing land supply or a sufficient supply of employment land at any point in the plan period.</p> <p>To ensure that the DLP is effective, consistent with national policy, and positively prepared, it is critical that the Plan seeks to maximise the contribution of suitable and deliverable sites. While the DLP is not required to conform to the 2024 NPPF, current national policy and guidance remain highly relevant, particularly as the Council's minimum housing requirement under these policies is 1,473 dwellings per annum.</p> <p>In addition, the December 2025 draft NPPF reinforces the presumption in favour of sustainable development, particularly for sites located within reasonable walking distance of existing or planned train stations. Land at Main Road, Boreham is well-located in this context, offering the opportunity to support sustainable, accessible residential development in line with this emerging national policy emphasis. The Site's proximity to public transport strengthens the case for its allocation, reflecting the NPPF's objectives of promoting sustainable patterns of growth and reducing reliance on private car travel.</p> <p>In this context, This Land considers that the DLP's failure to allocate Land at Main Road, Boreham—a site which is evidently sustainable and deliverable—means that the Plan, in its current form, is not yet capable of being found sound. However, relatively modest modifications to the DLP, including allocation of this Site, would address this deficiency and render the Plan sound.</p> <p>The SEA Regulations require that an Environmental Report is prepared for plans such as the emerging Local Plan. The IIA accompanying the Regulation 19 Addendum seeks to meet this requirement. Paragraph 32 of the NPPF makes clear that sustainability appraisals meeting the legal requirements of the SEA Regulations should inform Local Plans throughout their preparation, demonstrating how economic, social, and environmental objectives—including opportunities for net gains—have been addressed.</p> <p>Accordingly, the IIA is critical both to the DLP's legal compliance and to its soundness.</p> <p>The SEA Regulations require the Environmental Report to identify, describe, and evaluate the likely significant effects on the environment of proposed options, as well as reasonable alternatives (Regulation 12(2)). Regulation 16 requires that the report also explains why certain options are selected and others rejected.</p> <p>In determining reasonable alternatives, the Council's Strategic Housing and Employment Land Availability Assessment Autumn 2025 ('SHELAA') is particularly relevant, as it considers sites' suitability, availability, and achievability for residential development.</p> <p>The SHELAA objectively assesses sites against various criteria, assigning a 'RAG' rating. A 'green' rating indicates that the site "scores highly against criteria and demonstrates compliance with national and local policy. Site faces minimal constraints and is considered deliverable."</p> <p>Land at Main Road, Boreham was assessed by the Council as site reference CFS9. In both cases, the Site was rated yellow. This indicates that the Site's suitability and achievability were assessed as green, but its availability was rated yellow due to a perceived lack of evidence of landowner support at the time of submission.</p> <p>This Land confirms that there is full support from the landowner for the promotion and allocation of this Site. On this basis, the Site should be considered green across all three RAG criteria—suitable, available, and achievable. As such, the Site represents a deliverable and sustainable option and should be favourably considered for allocation in the Draft Local Plan.</p>

The IIA identifies two options for appraisal:
Option 1: Allocation of Regulation 19 sites, increased capacities, and additional small sites.
Option 2: Allocation of Regulation 19 sites, plus an additional strategic site or sites.
The IIA assesses the original Regulation 19 allocations combined with Option 1 sites, and the original allocations combined with Option 2 sites.
The IIA concludes that Option 1 is preferred for the following reasons:
Compliance with the Local Plan's Strategic Priorities, Vision, and Spatial Principles.
Alignment with the settlement hierarchy.
Strong performance in housing, economy, and employment, and relatively strong performance in sustainable living, revitalisation, health and wellbeing, and transport.
Efficient use of existing and proposed infrastructure.
Inclusion of employment sites.
Sites expected to deliver within the first five years.
Option 2 is rejected on the grounds that it:
Deviates from the Local Plan's Strategic Priorities, Vision, and Spatial Principles.
Is inconsistent with the settlement hierarchy.
Performs relatively poorly in economy, sustainable living, health & wellbeing, and transport.
Has unproven infrastructure requirements.
Cannot reliably deliver within the first five years due to its inclusion in larger development areas.
This Land raises concerns with these conclusions and the justification for selecting Option 1.
The IIA treats all Option 1 sites as equally sustainable, applying blanket conclusions across sites of differing characteristics, locations, and settlement hierarchy positions. Some Option 2 sites clearly contribute more effectively to the Plan's strategic priorities, vision, and spatial principles.
It is not credible to suggest that small sites inherently perform better than larger sites in housing, economy, employment, sustainable living, health and wellbeing, or transport. Some small sites are poorly connected and lack sustainable transport access relative to certain Option 2 sites.
The IIA's grouping of sites fails to consider whether larger sites could deliver independently. Sites such as Land at Main Road, Boreham have only been rejected because they are grouped with other strategic sites, without individual assessment.
The reference to "includes employment sites" as a reason for preferring Option 1 is flawed. Additional employment allocations could be delivered alongside larger residential sites in Option 2; these are not interdependent.
Our concerns are therefore threefold:
1. Land at Main Road, Boreham (CFS9) is not incorporated into either Option, despite being rated green and deliverable.
2. It is unclear why some sites are included in Option 1 but others, such as this Site, are excluded. The Site should have been included as part of Option 1 given its suitability, availability, and achievability for fewer than 500 dwellings.
3. The issues largely stem from grouping sites prior to assessment. A more robust appraisal would compare sites individually against sustainability objectives, assessing larger sites both as standalone deliverable options (as is feasible for this Site) and as part of wider strategic growth.

Question 3	Please refer to accompanying representations. (nothing explicit noted in attachment in this respect)
Question 4 - Executive Summary	Please refer to accompanying representations. (nothing explicit noted in attachment in this respect)
Attachment/s	This Land - Boreham Reg 19 Representation Jan 2026.pdf

ID	ASIIA-55
Person ID	1397696
Full Name	Mr and Mrs Simon and Susan Polley
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	West of Chelmsford (North of Hollow Lane) - New Site CFS182/18SLAA9
Question 1	No
Question 2 - Please provide an explanation below:	<p>As local residents to this specific proposed additional site SGS 18a we wish to object to its inclusion within the Local Plan. Such inclusion of this site would render the Local Plan as NOT sound. Site SGS 18a has not been sufficiently justified, is in an open countryside location on Rural Land, also on agricultural land and is not consistent with national policy. The Chignal Parish Council response to the Focused Consultation Additional Sites (Regulation 19) Document is endorsed and supported.</p> <p>To justify our own private objections to the inclusion of this additional site we refer to the RAG site assessment Objectives, used to justify SGS 18a, contained in the Addendum document. Research was undertaken on a number of the relevant Objectives, as outlined below, and also forms part of the Chignal Parish Council response.</p> <p>Objective 1 – Biodiversity and Geodiversity</p> <p>The stated 'Minor Negative Effect' is felt to be insufficient given the negative effects identified. 'Significant Negative Effect' would be a more appropriate assessment using the evidence below.</p> <p>The Broomwood Manor property (Broomwood Lodge) and the immediate surrounding rural area, has an abundance of wildlife habitats, rare so close to urban areas. A Conservation report, produced by the Essex Wildlife Trust in July 2020 for Broomwood Manor, notes the presence of Great Crested Newts, birds of prey, badger sets, a variety of deer, wildflower meadow and large lentic water moat supporting invertebrates, as well as hedgerows supporting owls, bats and birds.</p> <p>The stated objective quoted is to “preserve and where appropriate enhance the setting” of Broomwood Manor property, (Broomwood Lodge). Rather than preserve and enhance, the proposed intrusive construction activity and housing development immediately adjacent to this historic property would cause significant disturbance to such an important wildlife habitat.</p> <p>Building 100 houses on site SGS 18a would require a significant investment in establishing and maintaining a landscape buffer to minimise the resulting visual and noise disturbance to residents, footpath users and wildlife.</p> <p>Objective 2 – Housing</p> <p>Clearly any site proposed in the Local Plan would have a positive effect in providing new dwellings to meet imposed/increased Government targets. The imposition of these enhanced targets should be first questioned with the relevant Government Department, especially having in mind the excellent housing provision record of Chelmsford City Council.</p> <p>Objective 4 – Sustainable Living and Revitalisation</p> <p>The objective effect of 'No Relationship' is felt to be unjustifiable. A 'Minor/Significant Negative Effect' would be more appropriate based on the evidence below that development of site 18a “would not contribute to the provision of additional services and facilities and would increase pressure on existing services and facilities”. The development does not appear to offer any new facilities or services; the occupants of the 100 dwellings would put added strain on those that already exist.</p> <p>The nearest GP Surgery, Parkside Medical Centre, is over 1,600m away, noting that the Dickens Place Surgery is only now available to Private patients.</p> <p>The local medical practices, including Parkside, are under extreme pressure and would find it difficult to serve the occupants of another 100 dwellings.</p> <p>The nearest Primary School is Newlands Spring Infants and Junior School, approximately 500m away (0.6 miles). The school has no extra capacity at present and has already exceeded its limit of 450 pupils with 488 currently attending (based on information from School website).</p> <p>Secondary Schools include Chelmer Valley High School, located over 2,000m away, with Hylands School and The Boswells School both over 3,000m distant. All of these are not within a reasonable walking distance; cycle routes are inadequate or non-existent; and bus services very limited.</p> <p>The closest Post Office is 1,300m distant, and again not within a reasonable walking distance, especially for the elderly and those with disability requirements.</p> <p>Morrisons, the local supermarket, is within 500m and walkable via the residential development south of Hollow Lane.</p> <p>The distance to the Railway Station/Bus Station/Town Centre is approximately 3,000m. Regular bus services are only available from bus stops close to the Morrisons Supermarket.</p>

A limited community bus service exists but this would not be suitable or sufficient to service the 100 new dwellings as far as commuting is concerned.

Objective 5 – Health and Wellbeing

A 'Minor Positive Effect' is not felt to be justified based on the evidence below. 'Minor Negative Effect' would be more appropriate.

The nearest GP Surgery, Parkside Medical Centre, is over 1,600m away, noting that the Dickens Place Surgery is only now available to Private patients.

The local medical practices, including Parkside, are under extreme pressure and would find it difficult to serve the occupants of another 100 dwellings.

Writtle Surgery is over 3,000m (2.7 miles) away, and Little Waltham Surgery nearly 4,000m (4.7 miles) away. Neither are within reasonable walking distances.

The proposed development would NOT contribute to the provision of open space and/or health facilities. Farmland with footpath access, would be lost to this new housing.

Local residents manage a CIC Wilder Spaces project which hosts SEND and autistic children from the local Hawthorn school every week, to enable them to enjoy the quiet, secure, private setting of the meadow and wood. 100 new dwellings would have a significant impact on this provision, especially during the construction period.

Objective 6 – Transport

The 'Mixed' effect is not justified. The evidence below indicates a more appropriate assessment would be a 'Significant Negative Effect'. Based on evidence from annual traffic counts carried out by Essex Highways, the Parish Council has on several occasions raised concerns about the detrimental environmental and social impact of increased numbers of vehicles at peak times using Chignal Road.

The site would be more than 400m from all services. The closest bus stop being over 400m away from most of the site.

The nearest railway station, Chelmsford, is over 3000m away. The nearest Park & Ride at Little Waltham is 3700m from SGS18a.

The site entrance to SGS 18a adjoins the entrance to Broomwood Manor. It is also very close to the entrance to Kilnfield Barns and to the poorly designed junction of Chignal Road/Hollow Lane. In peak times significant congestion occurs at this junction and would have a detrimental effect on the existing residents.

Objective 13 – Cultural Heritage

A 'Neutral' effect rating for this objective is disputed having regard to the proximity of Listed Buildings (Chobbings Farmhouse Grade II*; Granary Chobbings Grade II; and Chopyns Barn Grade II) and non-designated heritage assets (Broomwood Manor and Nos 3 and 4 Kilnfield Barns. Recent planning decisions provide evidence that a 'Significant Negative Effect' would be more appropriate.

The Listed Buildings and Non-Designated Heritage Assets are sited within a Rural Area. The construction of 100 new dwellings on the fields proposed would attach these assets to the Urban Area and remove the green space between them. A location within a countryside environment would be lost.

The intrinsic character and beauty of the countryside, as viewed from the existing Urban Area (Little Hollows), would be lost. Hollow Lane forms a natural boundary to the Urban Area and should be retained as such.

Kilnfield Barns is provided with open space/amenity areas, including a pond, which would overlook the proposed site. The nearest existing properties off Hollow Lane are approximately 200m away, the new build proposed dwellings would be within 125m.

For Broomwood Manor the nearest existing properties off Hollow Lane are approximately 300m away, the new build proposed dwellings would be within 80m.

The Chignal Villages Design Statement (CVDS) includes guidance on development in the area around Beaumont Otes, now Kilnfield Barns. It confirms that period farm buildings are an integral part of the Chignals' strong agricultural identity. The refurbishment and re-building of the barns on Beaumont Otes followed this design guidance, CVDS and the Local Plan, to preserve the intrinsic character and beauty of the Rural Area. The development of 100 new dwellings on agricultural land would be contrary to this design guidance and would have an adverse impact on the existing rural heritage character of this area.

Objective 14 – Landscape and Townscape

The RAG assessment of 'Neutral' for this objective is disputed. There is clear evidence that the "development may have an adverse effect on landscape/townscape character". A more appropriate rating would be 'Significant Negative Effect'.

The development of 100 houses proposed at SGS 18a will not be small scale nor will it respond to the historic settlement pattern of scattered farmsteads and open fields and woods, including our own property. Users of Footpath 35 - Chignal, including ourselves, would lose this valuable link with the open countryside beyond Broomwood Manor, into Hollow Lane and the wider PRoW network.

ID	ASIIA-18
Person ID	1095979
Full Name	Mr Graham Poulteney
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	PS11A -52 Chapter 5 3.4 to 3.12 inclusive
Question 1	No
Question 2 - Please provide an explanation below:	<p>The proposed development in Ford End adjacent to the Ford End school (Site 14b – Land South of Ford End Primary School) has grown from an original 20 dwellings to a current proposal of 75 dwellings. There was an interim proposal from Dandara for 50 dwellings, which did include provision for children's playground area and various public walkways, together with some very vague "traffic calming measures", much of which seems to have disappeared in the latest proposals, and replaced by - presumably smaller dwellings to be able to accommodate a further 25 dwellings and a new village hall. Firstly, Ford End already possesses a perfectly adequate, if under used village hall. What Ford End does not have is any sort of shop; no doctors or pharmacy; an erratic and totally unreliable bus service - none of which is being addressed as far as i can see in the proposals. Finally, there is the issue of traffic. We are told that because the B1008 is a "priority route" for emergency services then nothing can be done about reducing or slowing the ever increasing volume of speeding traffic. Now, suddenly, a roundabout is proposed for the single access point for the development. If this is simply going to be a white painted circle then please excuse my sceptism. Also, are you still using a hopelessly out of date traffic measurement system. Conservatively, 75 new dwellings is going to produce 150 new vehicles to the village, most moving at least twice on an average day. Have you considered the level of additional emissions right next to a primary school, and how carefully have you actually considered "traffic calming measures". This proposal has now got much to large for the village to accomodate. 20 new dwellings was tolerable; 50 was a stretch, and 75 is simply down to the developers' greed and the Council's timid acquiescence.</p>

ID	ASIIA-19
Person ID	1392958
Full Name	Mr Kannan Rajesparan
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Appendix C, page 11
Question 1	No
Question 2 - Please provide an explanation below:	<p>Several criteria in the table have been scored higher than they should be:</p> <ol style="list-style-type: none"> 1. There will be a negative impact on Wellbeing - Use of fields by local residents – We, alongside hundreds of other local residents use these field for walking, and it forms an important part of our wellbeing and mental health. Loss of this field will severely impact wellbeing and health of local residents. This has not been captured in the modelling that has been undertaken. No surveys have been undertaken of local residents. There is currently inadequate local healthcare provision. GP surgeries in the locality are already heavily subscribed with current residents already having difficulty getting an appointment in a reasonable time frame. A local GP practice (Dickens Place Surgery) has recently closed in 2023. Broomfield hospital is currently rated as “inadequate” (CQC 2025) for services for children and young people, with improvement required across the hospital. 2. Negative impact on flooding - Flood risk and water drainage – the fields provide an important area for water flow in an area that is of high risk for surface water flooding. Development on the fields will increase the risk of surface water flooding in the area. See figure 4 attached, diagram from surface water flood report undertaken October 2024 on the area West of Patching Hall Lane. 3. Cultural Heritage; Townscape and Landscape - Loss of this field will negatively impact the Townscape and Landscape. The field provides a natural break between settlements preventing coalition. It also provides natural landscape and views of importance. The field is an important natural landscape view for local residents and there will be significant detriment and loss of enjoyment of current residents located beside the proposed site for development. There are houses on this land that are listed and part of their appeal is their historical positioning in the countryside with uninterrupted views. 4. Biodiversity and geodiversity - Fields home to native wildlife – These fields are home to a wide variety and number of wildlife including deer, badgers, foxes, owls, many birds including red kites, and insects. This diversity of wildlife is not common in close proximity to urban areas and should be protected and celebrated. The fields are in close proximity to ancient woodlands. Local residents have pictures and video footage of this local wildlife. No formal assessment of local wildlife has been undertaken. Please see "Photos of Local Wildlife" attached. 5. Impact on educational establishments - local schools (nursery, primary and secondary) are at capacity, with the nearest primary schools having already recently expanded and full. 6. Transport - <ol style="list-style-type: none"> a) The residential travel pack associated with the proposal does not address the increase in traffic that would arise from such a development. b) There is inadequate local public transport, which invalidates the traffic modelling which has been undertaken. c) The traffic modelling which has been undertaken is not concordant with that experienced by local residents and does not take into account the impact on children using the road to walk and cycle to school. d) The two junctions for traffic to flow onto Broomfield Road (School Lane and Patching Hall Lane), are already back-logged in peak hours. Any development proposals on this site should consider entry from Chignal Road and Little Hollows, not Patching Hall Lane. e) A significant number of school children use Patching Hall Lane to cycle and walk to school. An increase in vehicular traffic and a further junction would impact the safety of these children. f) Irrespective of any developments, further traffic calming measures are required on Patching Hall Lane, to prevent through traffic in a residential area, through what is a country lane, not a road.
Question 3	<p>Several criteria in the table have been scored higher than they should be:</p> <ol style="list-style-type: none"> 1. There will be a negative impact on Wellbeing - Use of fields by local residents – We, alongside hundreds of other local residents use these field for walking, and it forms an important part of our wellbeing and mental health. Loss of this field will severely impact wellbeing and health of local residents. This has not been captured in the modelling that

	<p>has been undertaken. No surveys have been undertaken of local residents. There is currently inadequate local healthcare provision. GP surgeries in the locality are already heavily subscribed with current residents already having difficulty getting an appointment in a reasonable time frame. A local GP practice (Dickens Place Surgery) has recently closed in 2023. Broomfield hospital is currently rated as "inadequate" (CQC 2025) for services for children and young people, with improvement required across the hospital.</p> <p>2. Negative impact on flooding - Flood risk and water drainage – the fields provide an important area for water flow in an area that is of high risk for surface water flooding. Development on the fields will increase the risk of surface water flooding in the area. See figure 4 attached, diagram from surface water flood report undertaken October 2024 on the area West of Patching Hall Lane.</p> <p>3. Cultural Heritage; Townscape and Landscape - Loss of this field will negatively impact the Townscape and Landscape. The field provides a natural break between settlements preventing coalescence. It also provides natural landscape and views of importance. The field is an important natural landscape view for local residents and there will be significant detriment and loss of enjoyment of current residents located beside the proposed site for development. There are houses on this land that are listed and part of their appeal is their historical positioning in the countryside with uninterrupted views.</p> <p>4. Biodiversity and geodiversity - Fields home to native wildlife – These fields are home to a wide variety and number of wildlife including deer, badgers, foxes, owls, many birds including red kites, and insects. This diversity of wildlife is not common in close proximity to urban areas and should be protected and celebrated. The fields are in close proximity to ancient woodlands. Local residents have pictures and video footage of this local wildlife. No formal assessment of local wildlife has been undertaken. Please see "Photos of Local Wildlife" attached.</p> <p>5. Impact on educational establishments - local schools (nursery, primary and secondary) are at capacity, with the nearest primary schools having already recently expanded and full.</p> <p>6. Transport -</p> <p>a) The residential travel pack associated with the proposal does not address the increase in traffic that would arise from such a development.</p> <p>b) There is inadequate local public transport, which invalidates the traffic modelling which has been undertaken.</p> <p>c) The traffic modelling which has been undertaken is not concordant with that experienced by local residents and does not take into account the impact on children using the road to walk and cycle to school.</p> <p>d) The two junctions for traffic to flow onto Broomfield Road (School Lane and Patching Hall Lane), are already back-logged in peak hours. Any development proposals on this site should consider entry from Chignal Road and Little Hollows, not Patching Hall Lane.</p> <p>e) A significant number of school children use Patching Hall Lane to cycle and walk to school. An increase in vehicular traffic and a further junction would impact the safety of these children.</p> <p>f) Irrespective of any developments, further traffic calming measures are required on Patching Hall Lane, to prevent through traffic in a residential area, through what is a country lane, not a road.</p>
<p>Question 4 - Executive Summary</p>	<p>The scoring for site appraisal criteria for site 19 (Land West of Patching Hall Lane) has been inappropriately scored more positively than they should across several criteria. (Appendix C, Page 11). Please see text above for details.</p> <p>If these criteria were appropriately assessed and scored, the overall score would make this an unsuitable site for development.</p>
<p>Attachment/s</p>	<p>Figure 4 â diagram of high surface water flood risk from recent Flood Appraisal October 2024..jpg (1) photos of local wildlife.pdf (1)</p>

ID	ASIIA-16
Person ID	1329445
Company / Organisation	A.G. & P.W.H Speakman
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Sections 2.3 and 3
Question 1	No
Question 2 - Please provide an explanation below:	<p>Please see accompanying representations.</p> <p>(The representation relates specifically to the Landowners' interests in Land at Anchor Field, Danbury ("the Site") promoted under Council reference 21SHELAA82.</p> <p>The principle of identifying and allocating additional sites in response to these known delivery issues is supported. Such an approach is capable of assisting in ensuring that the Local Plan is effective, positively prepared, and consistent with national policy.</p> <p>It is noted that a reassessment of the Council's five-year housing land supply was undertaken and published in August 2025. This concluded that Chelmsford City could no longer demonstrate a five-year supply of deliverable housing sites under national policy, primarily due to the stalling or delay of several strategic allocations and the cancellation of the A12 widening scheme. This August 2025 position is explicitly cited within the Cabinet report as the trigger for reconsidering the soundness and risk of proceeding with the Draft Local Plan in the form consulted upon at Regulation 19 earlier in 2025.</p> <p>The rapid emergence of these delivery issues is notable. The fact that significant under-delivery was identified within a period of approximately six months following publication of the Regulation 19 Draft Local Plan—a plan intended to guide development over a minimum 15-year period—highlights the critical importance of ensuring that the Local Plan is imbued with a high degree of flexibility. Without such flexibility, there is a clear risk that the Council will continue to struggle to demonstrate a five-year housing land supply and an adequate supply of employment land at various points throughout the plan period.</p> <p>In order for the Draft Local Plan to be effective, positively prepared and consistent with national policy—which places considerable emphasis on meeting identified development needs, particularly housing—it is essential that the Plan seeks to maximise the contribution of suitable, sustainable and deliverable sites. It is also important to recognise that, whilst the Draft Local Plan is not required to conform to the 2024 NPPF, this does not render the current policy framework and Planning Practice Guidance immaterial. In this context, it is notable that under the current national policy methodology, the Council's minimum housing requirement would be 1,473 dwellings per annum.</p> <p>Against this backdrop, the failure of the Draft Local Plan to allocate the Site—a site which is demonstrably</p>

sustainable and deliverable—means that, in its current form, the Plan cannot yet be regarded as sound. Importantly, however, it is considered that through relatively modest modifications to the Draft Local Plan, including the allocation of the Site, the Plan could be rendered sound.

Additional Sites Assessment Process

The SEA Regulations require that for plans such as the emerging new Local Plan, an Environmental Report is prepared.

In the case of the emerging new Local Plan, the IIA of the Regulation 19 Addendum ('the IIA') evidently seeks to meet this obligation.

Additionally, at paragraph 32 of the NPPF, it is made clear that a sustainability appraisal that meets the relevant legal requirements (i.e. the SEA Regulations) should inform Local Plans throughout their preparation, and demonstrate how Local Plans have addressed relevant economic, social and environmental objectives (including opportunities for net gains).

As such, the IIA is important to both legal compliance and soundness of the DLP.

The SEA Regulations require the Environmental Report to identify, describe, and evaluate the likely significant effects on the environment of proposed options, as well as on reasonable alternatives (Regulation 12(2) of the SEA Regulations).

As per Regulation 16 of the SEA Regulations, the Environmental Report is ultimately also required to explain the reasons for selecting options and rejecting others.

In terms of which sites could be reasonable alternatives, the Council's Strategic Housing and Employment Land Availability Assessment Autumn 2025 ('the SHELAA') is considered particularly relevant, as it considers sites' suitability, availability and achievability for residential development.

The SHELAA provides an objective assessment of sites against various criteria in order to help conclude suitability, availability and achievability of residential development options. The SHELAA provides a 'RAG' rating for potential sites. If a site is rated 'green' it "scores highly against criteria and demonstrates compliance with national and local policy. Site faces minimal constraints and is considered deliverable."

In respect of the Site, it has been assessed by the Council within the SHELAA as site reference 21SHELAA82. The Site has been assigned an overall "amber" rating, with its suitability assessed as amber and its availability and achievability both assessed as green. The amber suitability rating arises from the Site scoring neutral against a number of individual criteria, including its proximity to a listed building, the presence of Tree Preservation Order (TPO) trees within part of the Site, and the fact that the land is identified as comprising higher quality agricultural land.

However, the assessment materially overstates the degree of constraint associated with these factors. None represent an absolute or in-principle impediment to development, and each is capable of being appropriately addressed through sensitive siting, layout and high-quality design. Potential effects on the setting of the nearby listed building can be avoided or mitigated through careful design, retention of key views, appropriate building heights and the incorporation of meaningful landscape buffers. Similarly, TPO trees can be retained and positively integrated within the development, contributing to character, biodiversity and place-making rather than constraining delivery. Whilst the loss of higher quality agricultural land is acknowledged, national policy recognises that such loss may be necessary where required to meet identified housing needs and where no suitable alternatives exist. In this context, the District's significant and demonstrable housing shortfall provides a compelling

justification, and the delivery of much-needed housing on a sustainable and deliverable site represents an appropriate and balanced planning response when considered against the wider public benefits of the proposal. Integrated Impact Assessment (IIA)

The IIA identifies two strategic options for appraisal. Option 1 comprises the allocation of sites proposed within the Regulation 19 Draft Local Plan, with increased capacities and the addition of further small sites. Option 2 comprises the allocation of the same Regulation 19 sites, together with the allocation of one or more additional strategic sites.

The IIA assesses the cumulative effects of the Regulation 19 allocations in combination with Option 1 sites, and separately assesses the Regulation 19 allocations in combination with Option 2 sites. Option 1 is identified as the preferred approach, with Option 2 rejected.

A number of concerns arise in respect of both the methodology adopted and the conclusions reached.

First, the IIA appears to treat all sites grouped within Option 1 as being of equal sustainability, applying blanket conclusions to a disparate collection of sites with materially different characteristics, locations, settlement relationships and levels of accessibility. This approach fails to recognise that some Option 1 sites contribute significantly less to the Draft Local Plan's stated strategic priorities, vision and spatial principles than others. By contrast, there are sites grouped within Option 2 which demonstrably perform better against those same objectives, including sites that would represent sustainable extensions to higher-order settlements within the settlement hierarchy.

The assertion that smaller sites are inherently more consistent with the settlement hierarchy is unfounded. Option 1 includes sites which would extend lower-tier settlements, whereas Option 2 includes sites that would relate to settlements at the top of the hierarchy. Similarly, it is not credible to conclude that the collective group of small sites performs more strongly than all larger sites in respect of housing delivery, economic growth, sustainable living, health and wellbeing, or transport. Several smaller sites are located in comparatively poorly connected locations with limited access to sustainable transport, whereas certain larger sites—such as the Site—are demonstrably more sustainable.

A fundamental flaw within the IIA is the grouping of sites prior to appraisal. By amalgamating all small sites into a single appraisal entity, and all larger sites into another, the IIA fails to assess the merits of individual sites on their own terms. This flaw is particularly evident given that Option 2 is rejected on the basis of infrastructure requirements and deliverability within the first five years. If the larger sites were assessed individually, it would be clear that some—including the Site—are capable of early delivery and do not rely on extensive infrastructure upgrades that would impede implementation.

The IIA therefore presents a false binary choice between multiple small sites of varying sustainability and very large strategic growth options. The Site has effectively been dismissed solely on the basis that it has been considered only as part of a wider strategic grouping, with no direct comparative assessment against the sites promoted under Option 1.

This flawed approach is further illustrated by the reliance on the inclusion of employment land as a justification for Option 1. There is no logical or evidential basis for concluding that employment allocations could not equally be made alongside the allocation of additional residential sites currently grouped within Option 2.

In summary, concerns arise in three principal respects. First, the site appears to not have been included within

either Option 1 or Option 2, notwithstanding the inclusion of other sites in the Danbury area. Second, the grouping methodology adopted within the IIA undermines the robustness of the appraisal and the identification of reasonable alternatives. Third, a more credible and legally compliant approach would involve a comparative appraisal of individual sites against the sustainability objectives, assessing larger sites both as standalone deliverable options and, where appropriate, as components of wider strategic growth.

Such an approach would be far more likely to identify a balanced and justified strategy comprising a mix of sites—including the Site—which would materially enhance the soundness and effectiveness of the emerging Local Plan.

Summary

This representation has been submitted on behalf of the Landowners in response to the Regulation 19 Pre Submission Addendum to the emerging Chelmsford Local Plan Review. It focuses specifically on the Addendum and the implications arising from the Council's decision to identify additional residential and employment sites in response to demonstrable delivery failures within the existing allocation framework. The representation should be read alongside earlier Regulation 19 submissions, all of which remain extant and continue to raise unresolved soundness concerns.

The Addendum itself acknowledges a fundamental issue at the heart of the Draft Local Plan: namely, that a number of previously allocated sites have failed to come forward or are delivering at a slower pace than anticipated. This has resulted in the Council being unable to demonstrate a five-year housing land supply, a position identified within a very short period following publication of the Regulation 19 Draft Local Plan. This underscores the inherent fragility of the current strategy and highlights the need for a more flexible, resilient and deliverable approach to site allocation if the Plan is to remain effective over its full plan period.

In this context, the principle of identifying additional sites is supported. However, the approach taken through the Addendum and its supporting Integrated Impact Assessment is fundamentally flawed. The IIA fails to robustly assess reasonable alternatives, as required by the SEA Regulations and national policy, instead relying on the artificial grouping of sites into broad options that mask significant differences in sustainability, deliverability and strategic fit. This methodology results in a false choice between collections of small sites and large-scale strategic growth, without undertaking a meaningful comparative appraisal of individual sites on their own merits.

The Site has been assessed within the Council's own SHELAA evidence base as available and achievable, with constraints that are neither unusual nor insurmountable. Despite this, the Site has not been meaningfully considered within either of the Addendum's options, notwithstanding its clear potential to contribute to early housing delivery and enhance the Plan's flexibility. The SHELAA assessment itself overstates the degree of constraint arising from heritage considerations, the presence of TPO trees and agricultural land classification, all of which can be effectively addressed through sensitive design, mitigation and masterplanning. None of these factors constitute a principled reason to exclude the Site from allocation, particularly in the context of the District's significant and unmet housing needs.

More broadly, the Addendum fails to maximise the contribution of sustainable and deliverable sites and does not provide sufficient contingency to respond to changing circumstances over the plan period. As a result, the Draft Local Plan, in its current form, cannot be regarded as positively prepared, effective or justified, and is therefore not capable of being found sound.

Importantly, these deficiencies are capable of being remedied. A more robust and legally compliant approach—

	<p>one that involves the comparative appraisal of individual sites, including the Site, and recognises the role of well located, deliverable allocations in maintaining housing land supply—would materially enhance the Plan’s soundness. The allocation of the Site, either as a standalone allocation or as part of a broader spatial strategy, would represent a proportionate and necessary modification that would help ensure the emerging Local Plan is flexible, resilient and capable of meeting Chelmsford’s housing needs in full.)</p>
Question 3	Please see accompanying representations.
Question 4 - Executive Summary	This representation by Ceres Property for the landowners addresses the omission of Anchor Field, Danbury (Site 21SHELAA82) from the Chelmsford Local Plan Review site allocations. The site is assessed as available and achievable, with manageable constraints, but was not included in the Addendum’s options despite its potential to support early housing delivery and plan flexibility. The submission criticizes the Council’s assessment process, particularly the grouping of sites in the Integrated Impact Assessment, which fails to appraise individual site merits and masks differences in sustainability and deliverability. The document argues that the current approach does not comply with national policy or legal requirements for robust alternatives assessment. It recommends a more nuanced, site-specific appraisal and the allocation of Anchor Field to enhance the Local Plan’s soundness, flexibility, and ability to meet housing needs. The omission is seen as a missed opportunity to address delivery shortfalls and improve the plan’s effectiveness.
Attachment/s	Anchor Field - Reg 19 Addendum.pdf (1) 2025 17 03 Chelmsford Reg 19 - Anchor Field; Speakman .pdf (1)

ID	ASIIA-57
Person ID	1398025
Full Name	Mrs and Mrs Stainton and Mrs Heather Smith
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Assessment of additional sites: Site 18a
Question 2 - Please provide an explanation below:	<p>As local residents to this specific proposed additional site SGS 18a we wish to object to its inclusion within the Local Plan. Such inclusion of this site would render the Local Plan as NOT sound. Site SGS 18a has not been sufficiently justified, is in an open countryside location on Rural Land, also on agricultural land and is not consistent with national policy. The Chignal Parish Council response to the Focused Consultation Additional Sites (Regulation 19) Document is endorsed and supported.</p> <p>To justify our own private objections to the inclusion of this additional site we refer to the RAG site assessment Objectives, used to justify SGS 18a, contained in the Addendum document. Research was undertaken on a number of the relevant Objectives, as outlined below, and also forms part of the Chignal Parish Council response.</p> <p>Objective 1 – Biodiversity and Geodiversity</p> <p>The stated 'Minor Negative Effect' is felt to be insufficient given the negative effects identified. 'Significant Negative Effect' would be a more appropriate assessment using the evidence below.</p> <p>The Broomwood Manor property (Broomwood Lodge as noted on the application) and the immediate surrounding rural area, has an abundance of wildlife habitats, rare so close to urban areas. A Conservation report, produced by the Essex Wildlife Trust in July 2020 for Broomwood Manor, notes the presence of Great Crested Newts, birds of prey, badger sets, a variety of deer, wildflower meadow and large lentic water moat supporting invertebrates, as well as hedgerows supporting owls, bats and birds.</p> <p>The stated objective quoted is to “preserve and where appropriate enhance the setting” of Broomwood Manor property, (Broomwood Lodge). Rather than preserve and enhance, the proposed intrusive construction activity and housing development immediately adjacent to this historic property would cause significant disturbance to such an important wildlife habitat.</p> <p>Building 100 houses on site SGS 18a would require a significant investment in establishing and maintaining a landscape/fencing buffer to Broomwood Manor to minimise the resulting visual and noise disturbance to residents, footpath users and wildlife.</p> <p>Objective 2 – Housing</p> <p>Clearly any site proposed in the Local Plan would have a positive effect in providing new dwellings to meet imposed/increased Government targets. The imposition of these enhanced targets should be first questioned with the relevant Government Department, especially having in mind the excellent housing provision record of Chelmsford City Council.</p> <p>Objective 4 – Sustainable Living and Revitalisation</p> <p>The objective effect of 'No Relationship' is felt to be unjustifiable. A 'Minor/Significant Negative Effect' would be more appropriate based on the evidence below that development of site 18a “would not contribute to the provision of additional services and facilities and would increase pressure on existing services and facilities”. The development does not appear to offer any new facilities or services; the occupants of the 100 dwellings would put added strain on those that already exist.</p> <p>The nearest GP Surgery, Parkside Medical Centre, is over 1,600m away, noting that the Dickens Place Surgery is only now available to Private patients.</p> <p>The local medical practices, including Parkside, are under extreme pressure and would find it difficult to serve the occupants of another 100 dwellings.</p> <p>The nearest Primary School is Newlands Spring Infants and Junior School, approximately 500m away (0.6 miles). The school has no extra capacity at present and has already exceeded its limit of 450 pupils with 488 currently attending (based on information from School website).</p> <p>Secondary Schools include Chelmer Valley High School, located over 2,000m away, with Hylands School and The Boswells School both over 3,000m distant. All of these are not within a reasonable walking distance; cycle routes are inadequate or non-existent; and bus services very limited.</p> <p>The closest Post Office is 1,300m distant, and again not within a reasonable walking distance, especially for the elderly and those with disability requirements.</p> <p>Morrisons, the local supermarket, is within 500m and walkable via the residential development south of Hollow Lane.</p> <p>The distance to the Railway Station/Bus Station/Town Centre is approximately 3,000m. Regular bus services are only available from bus stops close to the Morrisons Supermarket. A limited community bus service exists but this would not be suitable or sufficient to service the 100 new dwellings as far as commuting is concerned.</p>

Objective 5 – Health and Wellbeing

A 'Minor Positive Effect' is not felt to be justified based on the evidence below. 'Minor Negative Effect' would be more appropriate.

The nearest GP Surgery, Parkside Medical Centre, is over 1,600m away, noting that the Dickens Place Surgery is only now available to Private patients.

The local medical practices, including Parkside, are under extreme pressure and would find it difficult to serve the occupants of another 100 dwellings.

Writtle Surgery is over 3,000m (2.7 miles) away, and Little Waltham Surgery nearly 4,000m (4.7 miles) away. Neither are within reasonable walking distances.

The proposed development would NOT contribute to the provision of open space and/or health facilities. Farmland with footpath access, would be lost to this new housing.

Local residents manage a CIC Wilder Spaces project which hosts SEND and autistic children from the local Hawthorns school every week, to enable them to enjoy the quiet, secure, private setting of the meadow and wood. 100 new dwellings would have a significant impact on this provision, especially during the construction period.

Objective 6 – Transport

The 'Mixed' effect is not justified. The evidence below indicates a more appropriate assessment would be a 'Significant Negative Effect'. Based on evidence from annual traffic counts carried out by Essex Highways, the Parish Council has on several occasions raised concerns about the detrimental environmental and social impact of increased numbers of vehicles at peak times using Chignal Road.

The site would be more than 400m from all services. The closest bus stop being over 400m away from most of the site.

The nearest railway station, Chelmsford, is over 3000m away. The nearest Park & Ride at Little Waltham is 3700m from SGS18a.

The site entrance to SGS 18a adjoins the entrance to Broomwood Manor. It is also very close to the entrance to Kilnfield Barns and to the poorly designed junction of Chignal Road/Hollow Lane. In peak times significant congestion occurs at this junction and would have a detrimental effect on the existing residents.

Objective 13 – Cultural Heritage

A 'Neutral' effect rating for this objective is disputed having regard to the proximity of Listed Buildings (Chobbings Farmhouse Grade II*; Granary Chobbings Grade II; and Chopyns Barn Grade II) and non-designated heritage assets (Broomwood Manor and Nos 3 and 4 Kilnfield Barns).

Recent planning decisions provide evidence that a 'Significant Negative Effect' would be more appropriate.

The Listed Buildings and Non-Designated Heritage Assets are sited within a Rural Area. The construction of 100 new dwellings on the fields proposed would attach these assets to the Urban Area and remove the green space between them. A location within a countryside environment would be lost.

The intrinsic character and beauty of the countryside, as viewed from the existing Urban Area (Little Hollows), would be lost. Hollow Lane forms a natural boundary to the Urban Area and should be retained as such.

Kilnfield Barns is provided with open space/amenity areas, including a pond, which would overlook the proposed site. The nearest existing properties off Hollow Lane are approximately 200m away, the new build proposed dwellings would be within 125m.

For Broomwood Manor the nearest existing properties off Hollow Lane are approximately 300m away, the new build proposed dwellings would be within 50m.

The Chignal Villages Design Statement (CVDS) includes guidance on development in the area around Beaumont Otes, now Kilnfield Barns. It confirms that period farm buildings are an integral part of the Chignals' strong agricultural identity. The refurbishment and re-building of the barns on Beaumont Otes followed this design guidance, CVDS and the Local Plan, to preserve the intrinsic character and beauty of the Rural Area. The development of 100 new dwellings on agricultural land would be contrary to this design guidance and would have an adverse impact on the existing rural heritage character of this area.

Objective 14 – Landscape and Townscape

The RAG assessment of 'Neutral' for this objective is disputed. There is clear evidence that the "development may have an adverse effect on landscape/townscape character". A more appropriate rating would be 'Significant Negative Effect'.

The development of 100 houses proposed at SGS 18a will not be small scale nor will it respond to the historic settlement pattern of scattered farmsteads and open fields and woods, including our own property. Users of Footpath 35 - Chignal, including ourselves, would lose this valuable link with the open countryside beyond Broomwood Manor, into Hollow Lane and the wider PRoW network.

Conclusion

For the key reasons above, Policy 18a is not justified, not effective and not consistent with national policy. The allocation should be removed from the Local Plan review until:

A full infrastructure capacity assessment is conducted

Heritage, archaeological and mineral assessments are published

Transport modelling is provided

A masterplan is prepared and consulted on

The justification of expanding the urban boundary onto a rural community is justified and properly evidenced

ID	ASIIA-54
Person ID	1360942
Full Name	Alan and Jennifer Swash
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Page 16 of IIA and Pages 17 and 18 of IIA Appendix C
Question 2 - Please provide an explanation below:	<p>We make further representations concerning the accompanying Integrated Impact Assessment (IIA): Focused Consultation Additional Sites (Regulation 19) Addendum, and specifically to the assessment set out at Page 16 of that document and to the assessment at Pages 17 and 18 of Appendix C to that document.</p> <p>These current representations should be read in conjunction with the previous submissions that we have submitted concerning the proposed expansion of the Waltham Road Employment Area at the earlier Regulation 19 Pre-Submission Consultation of the full Plan that was undertaken by the City Council in February/March 2025. Our previous representations concerning the expansion of the Waltham Road Employment Area were submitted on 18th June 2024 at the Regulation 18 Preferred Options consultation stage and on 18th March 2025 at the Pre-Submission consultation stage. At those stages, the proposed expansion of the Employment Area was for an additional 3,500 sq.m. of (net) new floorspace at the site. The current Additional Sites consultation increases that total of proposed new floorspace to 'around 14,000 sq.m.' over a much larger site area (see below).</p> <p>We make further representations concerning the extracts from the Integrated Impact Assessment (IIA): Focused Consultation Additional Sites (Regulation 19) Addendum: (See attachment 1360942AS-A for tables).</p> <p>Our residential dwelling is located directly to the north-east corner of the proposed site allocation, as shown on Map SGS9a above. Our property is close to the western side of Waltham Road to the proposed expansion of the Waltham Road Employment Area and is the property that will potentially be the most seriously affected by the development of the site, and by the uses and activities that will be permitted at the site. In particular, the siting of any new industrial or warehousing buildings, which typically now have an eaves height of 10-15 metres, at the northern part of the site will completely dwarf our property and garden, regardless of any 'robust landscape buffer' or other boundary screening that might be included. This is an intolerable situation.</p> <p>Our primary representation is that neither the proposed Policy SGS9a nor the Integrated Impact Assessment (IIA) have taken account of the direct proximity of our property to the proposed extended Employment Area, beyond a site development principle in the Policy to "ensure no adverse impact on the living conditions of existing adjoining residential development" and statements in the Reasoned Justification at paragraphs 2.63 and 2.66 that:</p> <p>"2.63 The design and layout of proposals will also need to incorporate structural and buffer landscaping along the northern and western boundaries and provide landscape compensation measures. Landscape buffers should incorporate hedgerow strengthening and tree planting as well as other biodiversity enhancements and should seek to make linkages to the nearby local wildlife site, Boreham Road Gravel Pits, to the west of the site." (Our emphasis)</p> <p>"2.66 Some residential development lies to the north and east of the site. The development will be expected to provide suitable measures to ensure that the amenity of those residents is not adversely affected such as noise attenuation measures and boundary screening." (Our emphasis)</p> <p>The IIA is completely silent on any possible negative impacts upon nearby residential properties, including our own property, and states that "Growth Site Policy 9a contains appropriate mitigation measures to be applied to development." In this respect, the IIA is flawed through its clear and obvious failure to assess any possible impacts upon nearby residential properties, and we object to the IIA on that basis.</p> <p>(Complete representation attached - C1360942AS-A)</p>
Attachment/s	C1360942AS-A.pdf

1380218, Taylor Wimpey Strategic Land

ID	ASIIA-7
Person ID	1380218
Full Name	
Company / Organisation	Taylor Wimpey Strategic Land
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	pre-submission January 2025 Appendix M and November 2025 update
Question 2 - Please provide an explanation below:	The lack of accessibility to key day-to-day services which are typically contained within shopping areas of neighbourhood centres is demonstrated in the Integrated Impact Assessment ¹ evidence base for the emerging Local Plan. Table 2 (see attachment 1380218IIA-A.pdf) sets out extracts of the IIA conclusions for each of the proposed additional sites in respect of their accessibility to services and facilities. It demonstrates that the majority of sites containing proposed additional housing are not in close proximity to these day-to-day amenities – an approach which will not promote a sustainable pattern of development.
Attachment/s	1380218IIA-A.pdf

ID	ASIIA-17
Person ID	1397874
Company / Organisation	Taylor Wimpey Strategic Land
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	General comment
Question 2 - Please provide an explanation below:	<p>(1.2 TWSL is promoting a residential-led development of 21SHELAA41 (Land Adjacent Reeds Spring, Roxwell Road, Writtle, Chelmsford) ('the Site'). (Additional detail on the Site in attachment 'Chelmsford Reg 19 Addendum Rep - TWSL - West Chelmsford').</p> <p>The IIA and consideration of options</p> <p>3.15 SEA Regulations¹ require that for plans such as the emerging new Local Plan, an Environmental Report is prepared.</p> <p>3.16 In the case of the emerging new Local Plan, the IIA of the DLP Addendum ('the IIA') evidently seeks to meet this obligation.</p> <p>3.17 Additionally, at paragraph 32 of the NPPF, it is made clear that a sustainability appraisal that meets the relevant legal requirements (i.e. the SEA Regulations) should inform Local Plans throughout their preparation, and demonstrate how Local Plans have addressed relevant economic, social and environmental objectives (including opportunities for net gains).</p> <p>3.18 As such, the IIA is important to both legal compliance and soundness of the DLP.</p> <p>3.19 The SEA Regulations require the Environmental Report to identify, describe, and evaluate the likely significant effects on the environment of proposed options, as well as on reasonable alternatives (Regulation 12(2) of the SEA Regulations).</p> <p>3.20 As per Regulation 16 of the SEA Regulations, the Environmental Report is ultimately also required to explain the reasons for selecting options and rejecting others.</p> <p>We have significant concerns with how the options considered by the IIA have been derived, and how they have been appraised, having regard to reasonable alternatives.</p> <p>3.22 The IIA identifies two options for appraisal: Option 1 entails allocation of the sites proposed at the Regulation 19 iteration of the DLP, but increasing capacities, and additional allocation of small sites. Option 2 comprises allocation of the same sites proposed in the Regulation 19 DLP, plus allocation of an additional strategic site or sites.</p> <p>3.23 The IIA purports to compare Option 1 with Option 2.</p> <p>3.24 Option 1 is selected as the proposed approach for the following reasons:</p> <p>It complies well with the Local Plan's Strategic Priorities, Vision, Spatial Principles.</p> <p>It is in accordance with the settlement hierarchy.</p> <p>It performs well in respect of housing and economy and employment, and relatively well in respect of sustainable living and revitalisation, health and wellbeing, and transport.</p> <p>It makes the best use of existing and proposed infrastructure capacity.</p> <p>It includes employment sites.</p> <p>Sites are expected to be delivered within the first five years of the Plan.</p> <p>3.25 The IIA explains Option 2 is rejected for the following reasons</p> <p>It deviates from the Local Plan's Strategic Priorities, Vision, Spatial Principles.</p> <p>It is not in accordance with the settlement hierarchy</p> <p>It performs relatively poorly in respect of economy, sustainable living, health & wellbeing and transport.</p> <p>Transport and other infrastructure requirements are unproven.</p> <p>Deliverability cannot be relied upon within the first five years of the Plan, due to being part of larger development areas</p> <p>3.26 Clearly there are some sites within Option 1 that contribute significantly less than others to these objectives. Similarly, and perhaps of more relevance, there are sites that have been included within Option 2 that contribute better to the DLP's proposed strategic priorities, vision and spatial principles.</p>

3.27 The conclusion that smaller sites are inherently in accordance with the settlement hierarchy, whilst those in Option 2, is entirely spurious. Sites within Option 1 include those that would provide extensions to lower tier settlements; whereas there are sites within Option 2 that would provide extensions to settlements at the top of the settlement hierarchy.

3.28 Similarly, it is simply not credible to suggest that the small sites identified all and / or as a basket of sites perform relatively better than all the options entailing provision of larger sites in respect of housing and economy and employment, and relatively well in respect of sustainable living and revitalisation, health and wellbeing, and transport. Again, there are sites within the set of small sites proposed located in locations which are far less well-connected and have limited access to sustainable transport opportunities than some of the sites in Option 1.

3.29 Part of the issue with the IIA is that it has amalgamated the small sites into a single entity which has then been appraised. Similarly, it has grouped various large sites together, but failed to consider sites within these groupings that could come forward independently of the others with which they have been grouped for the purpose of the IIA. The problematic nature of this approach is evident when one considers that the reasons for rejection of Option 2 include infrastructure requirements being unproven and inability to be relied upon in the first five years of the Plan. However, if one were to separate out the sites that have been grouped together within Option 2, one would find sites that whilst still relatively large could nevertheless contribute to housing within the first five years from adoption of the DLP and which do not require significant infrastructure upgrades that could be a barrier to delivery.

3.30 Another example of the flawed nature of this approach is that, by grouping multiple sites together and artificially considering them a single option, this can result in unsustainable sites being assessed positively as a result of other sites within the grouping being sustainable.

3.31 In effect, the IIA has presented a false choice between a grouping of multiple sites (which each vary in their sustainability) and large, strategic-scale growth in the thousands of dwellings. Sites such as the Site have only been rejected on the basis of them only being allocated as part of a wider strategic development. There is no comparative assessment between sites proposed as part of Option 1 and the Site itself.

3.32 The flawed nature of the IIA and how options have been generated and considered is perhaps best illustrated by the citing of "It includes employment sites" as one of the reasons why Option 1 is preferred. There is absolutely no reason why the proposed additional employment allocation could not be made alongside the allocation of larger residential options that have been grouped into Option 2 – the proposed additional employment land is entirely independent of the proposed residential allocations in Option 1. This provides a further example of the artificial nature of the options that have been appraised.

The problems with the IIA, we suggest, largely stem from the way that sites have been grouped before being assessed. A more effective approach that would ensure a robust appraisal of reasonable alternatives would be to undertake a comparative appraisal of the various potential sites against the sustainability objectives. This may well identify that a mix of sites, including some that are currently within Option 1 as well as those within Option 2, represents a sustainable and justified approach.

3.34 In such an appraisal, it would be important to assess the larger sites as both standalone sites (where this is deliverable, as is the case with the Site) and, separately, as part of a larger strategic growth in combination with other sites (again, where a such a strategic approach is deliverable).

3.35 The judgment in Cogent makes clear that the Strategic Environmental Assessment is an iterative process, and defects in earlier stages can be resolved at the later stage (even at very late stage in the process). We suggest that the issues we have identified in the IIA do not need to be fatal to the DLP. We urge the Council to revisit the approach taken by the IIA to the appraisal of alternatives in order to negate potential issues in respect of compliance with the SEA Regulations, as well as ensure the DLP is justified and consistent with national policy.

. ADDITIONAL / EXPANDED ALLOCATIONS PROPOSED

4.1 Linked and in addition to the concerns raised in Section 3 of this representation, we have particular concerns with the DLP Addendum's proposed approach to resolving the shortfall in housing identified in respect of the Regulation 19 DLP through additional / expanded allocations at the following sites:

11c Land west of Barbrook Way, Bicknacre – expanded allocation from 20 dwellings to 250

14b Land south of Ford End Primary School, Ford End – expanded allocation from 20 dwellings to 75

17c Land South of Rough Hill Complex, East Hanningfield – new allocation of 115 dwellings

17d Land South and South East of East Hanningfield Village – new allocation of 150 dwellings

17e Land South of Windmill Farm, Back Lane, East Hanningfield – new allocation of 40 dwellings

20 Land to East and North of Rettendon Place – new allocation of 350 dwellings.

4.2 The above are considered in turn, by settlement, below.

Bicknacre

4.3 The DLP Addendum includes proposed expanded allocation of 11c to accommodate 250, as opposed to 20, dwellings for a site located to the west of the village of Bicknacre.

4.4 The DLP suggests that Bicknacre is a Key Service Settlement in the borough's settlement hierarchy, i.e. a second-tier settlement.

4.5 Whilst only one tier below Chelmsford, it is important to recognise the fundamentally different characteristics of Chelmsford and Bicknacre, and the inherently different levels of sustainability as locations for growth.

4.6 Chelmsford is a large, sub-regional city and main employment and service centre, whereas Bicknacre is a small commuter village with a very limited role in terms of jobs, transport and higher-order facilities.

The built-up area of Bicknacre has a population of c.2,300. The village is part of the Parish of Woodham Ferrers and Bicknacre, the population of which as estimated by the 2021 Census was just under 3,000.

4.8 The village has a primary school, village hall and modest local shopping, with residents relying on higher-order centres such as Chelmsford and South Woodham Ferrers for most jobs, secondary education, major retail, leisure and healthcare, reinforcing its functional dependency and commuter role.

4.9 It does not benefit from a railway station or immediate proximity to any strategic highway links.

4.10 Chelmsford is a far more sustainable location to which to direct the additional housing for which the Council has now identified a need.

4.11 Whilst it is entirely appropriate that proportionate, relatively small-scale growth be directed to Bicknacre to support the vitality of the village, it is far from clear what the justification for the vast increase (in relative) terms of the number of new homes to be provided here is. There is nothing to suggest that this level of growth is required to support the vitality of the village, or to put another way, no indication that the level of growth the Regulation 19 DLP proposed for Bicknacre was insufficient.

4.12 It is considered neither justified nor consistent with national policy to direct additional growth on top of that the DLP Regulation 19 already proposed to a site on the edge of Bicknacre, when alternative options to direct growth to the edge of Chelmsford are available.

Ford End

4.13 Ford End lies on the B1008 roughly midway between Chelmsford and Great Dunmow and comprises just over 150 houses, with an estimated population of c.730 in 2018, indicating a very small village scale.

4.14 Ford End offers a limited range of local services including a Church of England primary school, village hall, with residents depending on larger centres for secondary education, major retail, healthcare and most leisure.

4.15 Ford End has no railway station and only limited bus services on the B1008, so most trips for work and services rely on private car travel towards Chelmsford, Great Dunmow or beyond, with constrained options for sustainable modes.

The DLP suggests it is a third-tier settlement in the settlement hierarchy, proposing it be designated a Service Settlement.

4.17 It is appreciated that, as with Bicknacre, it is important for planning to support the vitality of villages such as Ford End, including by directing proportionate growth to the village.

4.18 However, there is no suggestion that the DLP Addendum is necessary because the DLP would have result in insufficient growth being direct to Ford End to support its vitality.

4.19 Again, we question the justification for directing additional growth to the edge of such a settlement on top of that already proposed by the Regulation 19 DLP in order to address a housing shortfall at the borough-level, rejecting options to accommodate some of this need at the most sustainable settlement to which to direct growth.

East Hanningfield

4.20 East Hanningfield is a small rural parish with a population of c.1,100. It features a traditional village core with All Saints church, scattered housing amid farmland and countryside.

4.21 The village provides basic amenities like a primary school, village hall and limited community facilities, with residents travelling to Chelmsford for secondary education, hospitals, major retail and leisure.

4.22 East Hanningfield has limited employment opportunities within the village and immediate vicinity, generally limited to village services, farming and small businesses, with most working residents commuting to Chelmsford or further afield.

4.23 It lacks a railway station and has infrequent bus links, relying heavily on cars for access to Chelmsford via local roads like the B1007.

4.24 The 2021 Census suggests an average household size of 2.4 people per dwelling in East Hanningfield. On this basis, the DLP Addendum would result in the Parish's population increasing by c.720 people – a 65% increase

4.25 As with other small villages in the borough, it is important that the DLP directs some growth to the village to support existing services and facilities, and sustain its vitality. But again we suggest it is important to note the reasons why an addendum to the Regulation 19 iteration of the DLP was deemed necessary: that the overall housing delivery for Chelmsford was projected to be below that required; not that that the previous draft would fail to support the vitality of rural settlements. The justification to direct over 300 dwellings to sites on the edge of this village, resulting in a disproportionate level of growth being directed to this village, in preference to options on the edge of Chelmsford is far from clear.

Rettendon Place

4.26 Rettendon Place forms part of Rettendon Parish. The Parish has a population of just under 2,000, as estimated by the 2021 Census. However, we have been able to locate any data of the population of the built-up area of Rettendon Place itself, which reflects its character as a small, dispersed collection of dwellings clustered along the old A130.

4.27 Rettendon Place and the wider parish offer a limited range of facilities typical of a small village, with residents travelling to larger centres such as Chelmsford and Wickford for secondary education, major retail, healthcare and most leisure.

	<p>4.28 Rettendon Place and the wider parish offer a limited range of facilities typical of a small village, with residents travelling to larger centres such as Chelmsford and Wickford for secondary education, major retail, healthcare and most leisure.</p> <p>4.29 It is a third-tier settlement in the DLP's proposed settlement hierarchy, and having regard to the aforementioned characteristics, has very limited capacity to sustainably accommodate growth, particularly when considered relative to Chelmsford.</p> <p>4.30 The same concerns in respect of a disproportionate level of growth being directed to other rural settlements would apply here, but are perhaps even more acute. When one considers the lack of services or facilities available in Rettendon Place, the scale of growth the DLP Addendum proposes for the village, and the lack of any suggestion that this would be of such a scale as to provide critical mass to attract other services / facilities that would then enhance the sustainability of this location, then the DLP Addendum's approach to growth here is perhaps the most problematic aspect of the modifications it proposes.</p> <p>4.31 The Regulation 19 Addendum's proposed allocation of 350 dwellings in this location is not considered sound. It is not sustainable (thus inconsistent with national policy) and is not justified when one considers potential alternatives in manifestly more sustainable locations.)</p> <p>5.1 We consider that alternative and additional modifications are required to the DLP as currently proposed by the DLP Addendum in order to ensure the DLP is capable of being found sound.</p> <p>5.2 We consider the most significant risk to the DLP being found sound is the DLP Addendum's proposed allocation of additional sites that are in patently less sustainable locations than alternative options, including the Site. This should be seen in the context of the reason why the DLP Addendum was required – concerns that the Regulation 19 DLP would not deliver sufficient homes for Chelmsford in the early years from its adoption. There was no suggestion that the previous iteration of the DLP was unsound in terms of its approach to supporting the vitality of its villages such as</p> <p>5.3 A further, and similarly significant, risk in our view is in respect of the IIA of the DLP Addendum. This has resulted in sites that are clearly less sustainable than alternatives been grouped together and assessed against an alternative grouping of sites. However, both groupings appear arbitrary and we suggest further explanation and justification of how the IIA has arrived at these two options. At present, it appears a false choice between a basket of small sites and taking a strategic approach. We suggest a more nuanced approach is required in which the sustainability of the individual small sites needs to be considered relative, and potentially alongside, more strategic options. At present, we suggest there is a significant risk that the IIA does not comply with the SEA Regulations. The judgment in Cogent confirms that defects in the SEA process can be rectified, even at a very late stage; but importantly Cogent confirms the need to avoid an ex post facto justification of the strategy already determined, i.e. in addressing defects in the IIA, the Council will need to ensure that it responds appropriately to any of its conclusions once reasonable alternatives and genuine options have been appropriately appraised.</p> <p>5.4 We recognise the need to ensure an updated Local Plan is in place for Chelmsford, and we urge the Council to consider the issues we have raised within this representation. We do not feel that any of the defects we have identified are incapable of being cured, and indeed can be done so without entailing significant delay to the plan-making process. Whilst we are conscious that there are examples of issues being addressed through commitments to an early review of a Plan, reliance on such an approach would of course be high-risk. We consider the Site has a role to play in addressing issues with the DLP. We would welcome the opportunity to discuss the Site, and how it could contribute to a sound strategy for accommodating Chelmsford's development needs, further with the Council.</p> <p>(See attachment 'Chelmsford Reg 19 Addendum Rep - TWSL - West Chelmsford' for points made in respect of Strategic Policy S7)</p>
Question 4 - Executive Summary	Please see attached (nothing explicit noted in attachment 'Chelmsford Reg 19 Addendum Rep - TWSL - West Chelmsford' in this respect)
Attachment/s	Chelmsford Reg 19 Addendum Rep - TWSL - West Chelmsford.pdf (1)

ID	ASIIA-21
Person ID	873317
Full Name	
Company / Organisation	Van Diemans Property Company
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Sections 2.3 and 3
Question 1	No
Question 2 - Please provide an explanation below:	<p>Please refer to accompanying representations. (Land north of the Coal Yard, Chelmsford (Site Reference CFS135) Strategic Context and Housing–Employment Balance Policy S6 of the Draft Local Plan identifies a minimum requirement of 22,990 net new homes, equating to 1,210 dwellings per annum. While this represents an uplift from earlier stages of plan preparation, it remains materially below Chelmsford's revised standard method requirement. Notwithstanding the transitional arrangements, the NPPF is clear that plan-making should actively contribute to the achievement of sustainable development. Paragraph 1 confirms that the planning system should support economic growth and productivity, while paragraph 11 requires plans to positively seek opportunities to meet development needs in full. Paragraph 20 further requires strategic policies to make sufficient provision not only for housing, but also for employment and other uses necessary to support sustainable communities. Against this backdrop, it is essential that housing delivery is supported by a sufficiently flexible and responsive supply of employment land. The DLP Addendum acknowledges this relationship in principle; however, the additional sites strategy does not fully reflect the importance of identifying employment opportunities that can be delivered early and in parallel with housing growth. Site Context and Role Land north of the Coal Yard is located immediately adjacent to established employment uses and forms part of a wider and coherent cluster of activity along Essex Regiment Way. The Site lies within the Chelmsford urban fringe and occupies a highly accessible location that is closely related to existing infrastructure, services and transport corridors. In spatial terms, the Site aligns with the highest tier of the settlement hierarchy identified in Policy S7, reflecting its strong functional relationship with Chelmsford and the Beaulieu Park area. The Site is being promoted for employment-led development, with the potential to accommodate a mix of complementary uses including employment floorspace and recreation and leisure activities falling within Class E(d). Such uses would directly support the objectives of Policy E1, which seeks to promote economic growth and diversification, and Policy E2, which encourages a varied and flexible portfolio of employment sites capable of responding to changing market demands. The Site's characteristics mean it is well suited to low-impact, sensitively</p>

designed development that reinforces the role of this location as an established employment and activity area.

Green Wedge Considerations

It is acknowledged that the Site lies within the Green Wedge designation. However, Green Wedge policy is not intended to preclude all forms of development irrespective of context. Rather, it seeks to protect openness, prevent coalescence and safeguard opportunities for recreation and landscape enhancement.

In this instance, development of Land north of the Coal Yard would require only a modest and logical adjustment to the Green Wedge boundary, reflecting existing development patterns and defensible physical features.

Importantly, such an adjustment would not undermine the strategic function of the Green Wedge and could be accompanied by landscape improvements, enhanced access and improved connectivity through and around the remaining Green Wedge land.

This approach would be consistent with paragraph 20 of the NPPF, which requires strategic policies to be justified, proportionate and responsive to local circumstances, particularly where doing so would support sustainable development objectives.

Regulation 19 Addendum and Site Selection

The DLP Addendum introduces additional housing and employment sites in response to delivery challenges arising from stalled strategic sites and changes to infrastructure assumptions. The principle of identifying additional sites to improve plan flexibility and effectiveness is supported and reflects paragraph 22 of the NPPF, which requires plans to be sufficiently adaptable to rapid change.

However, the site selection process appears to have discounted sites within the Green Wedge as a matter of principle, rather than assessing whether individual sites could contribute positively to the Plan's objectives. This approach does not fully reflect the spatial strategy set out in Policy S7, nor does it maximise opportunities to deliver development in the most sustainable locations.

Land north of the Coal Yard meets many of the Council's stated criteria for additional site selection. It is well connected, closely related to existing development, and capable of contributing to economic growth in the early years of the plan period.

Employment Delivery and Effectiveness

The DLP Addendum recognises that housing growth must be supported by commensurate increases in employment floorspace. Paragraph 81 of the NPPF emphasises the importance of planning positively for economic growth, including through the identification of sites that are accessible, deliverable and attractive to the market.

While larger strategic employment allocations have an important role, such sites are typically subject to longer lead-in times and delivery uncertainties. Smaller and medium-scale employment opportunities, such as Land north of the Coal Yard, provide valuable flexibility and are capable of being brought forward more quickly. Their inclusion would therefore improve the effectiveness of the Plan and reduce the risk of a mismatch between housing delivery and job creation.

Integrated Impact Assessment

Paragraph 32 of the NPPF requires sustainability appraisal to inform plan preparation and to demonstrate that reasonable alternatives have been properly considered. In this regard, it is unclear that the Integrated Impact Assessment accompanying the DLP Addendum has adequately assessed whether certain Green Wedge sites could perform well against sustainability objectives when considered on their individual merits.

	<p>A reasonable alternative would have been to assess sites such as Land north of the Coal Yard, which are adjacent to existing development, highly accessible and capable of delivering economic benefits in sustainable locations.</p> <p>Conclusion</p> <p>In conclusion, Land north of the Coal Yard represents a sustainable, proportionate and deliverable opportunity to support the employment objectives of the Draft Local Plan in accordance with Policies S6, S7, E1 and E2, and the overarching objectives of the NPPF.</p> <p>The omission of the Site from the DLP Addendum means that the Plan has not fully explored reasonable alternatives capable of supporting economic growth and early delivery. With modest modification, including the allocation of Land north of the Coal Yard, the Draft Local Plan would be more positively prepared, better justified, and more effective in meeting Chelmsford's identified development needs.)</p>
Question 3	Please refer to accompanying representations.
Question 4 - Executive Summary	<p>This representation, submitted by Ceres Property LLP on behalf of Van Diemans Property Company Ltd, relates to land north of the Coal Yard, Chelmsford, and comments specifically on the Regulation 19 Pre-Submission Additional Sites Addendum to the emerging Chelmsford Local Plan Review. It supports the principle of identifying additional sites to enhance plan flexibility but raises concerns regarding the exclusion of suitable employment land within Green Wedge areas.</p> <p>The representation notes that the Draft Local Plan's minimum housing provision (22,990 dwellings) remains below the standard method requirement, and stresses the importance of ensuring an appropriately balanced supply of employment land. Land north of the Coal Yard forms part of an established employment cluster, is highly accessible, and is capable of early delivery of employment-led, mixed-use development consistent with Policies S6, S7, E1 and E2 of the Draft Plan and the NPPF's sustainable development objectives.</p> <p>It is contended that a modest Green Wedge boundary adjustment would not compromise its strategic function and could deliver landscape and connectivity benefits. Inclusion of the site would strengthen the Plan's effectiveness, ensuring alignment between housing and employment growth while improving its deliverability and resilience to change.</p>
Attachment/s	Coal Yard Reg 19 Focused Consultation.pdf

ID	ASIIA-44
Person ID	1396287
Full Name	
Company / Organisation	Vistry Strategic Land
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Section 2 - paragraph 2.2.5
Question 1	No
Question 2 - Please provide an explanation below:	<p>These representations concern land to the south of Writtle and north of the A414, Writtle (previously assessed by the City Council under reference CFS129 – ‘the site’). Our client also has interests in land at Skeggs Farm, Chelmsford (previously assessed under reference CFS113). Whilst these two sites are being promoted separately and could be delivered independently of one another, there is also an opportunity to combine them to create a comprehensive development that would offer integrated and strategic benefits for the benefit of Writtle and the wider Chelmsford City area.</p> <p>The site is suitable for development, within Vistry’s control and is therefore immediately available, and free from constraints that would make development unachievable. The site is considered to be deliverable within the early stages of the Local Plan Review period and could form an important part of the Council’s five year housing land supply (5YHLS), which is the purpose of this Additional Sites Consultation.</p> <p>(Additional detail on the Site in attachment 1396287AS-A.pdf).</p> <p>Proposed Site Allocations and the Integrated Impact Assessment</p> <p>2.14 As outlined above (Additional detail on the Site in attachment 1396287AS-A.pdf), we are of the opinion that the Additional Sites Document is now proposing the allocation of a series of new sites in unsustainable locations, contrary to the underlying principles of the Spatial Strategy. Most notably, these are the allocations at Ford End (GS14b – 75 units), Rettendon Place (SGS20 – 350 units) and Woodham Ferrers (GS21a and GS21b – 15 units at each site).</p> <p>2.15 All three of these settlements are identified as ‘Service Settlements’ within the Plan’s settlement hierarchy, which as stated at paragraph 3.30 of the consultation document, “Service Settlements have more limited services and facilities but typically include primary schools, convenience shopping facilities and community facilities making them suitable for a more limited scale of development”. Despite being identified for more limited development, the Plan seeks to direct 75 units to Ford End, 30 units to Woodham Ferrers and an astonishing 350 units to Rettendon Place. As recognised by the Plan, these settlements have limited services and facilities, and therefore any future development here</p>

will be contrary to the Plan's Strategic Priorities and Spatial Principles, including in respect of the promotion of sustainable transport and ensuring sustainable patterns of development.

2.16 As a result of the Council's reluctance to direct any growth to sites within the Green Belt, Key Service Settlements such as Writtle continue to receive no additional growth, despite the consultation document recognising their importance (paragraph 3.29) as follows:

"Key Service Settlements provide a range of services and facilities for their residents.

These include primary school provision, local employment opportunities, convenience shopping facilities, community facilities, good links by public transport to higher order settlements, good access to the strategic road network, and in most cases primary healthcare provision. These Key Service Settlements will be the focus for housing provision outside Chelmsford and South Woodham Ferrers, with a higher level of growth due to their higher level of services, facilities and economic activity. Growth in Key Service Settlements aims to increase their self-containment and enhance their service role, reflecting the aspirations of national policy in promoting stronger communities."

2.17 In addition, the village of Writtle is in the unique position of being within close proximity to the Anglian Ruskin University Writtle, which is allocated a Special Policy Area, given its importance as a key employer and higher education facility within Chelmsford. We again re-emphasise and endorse the following extract taken from the first Regulation 19 representations submitted on behalf of Vistry in respect of Policy SPA6 (ARU Writtle Special Policy Area):

"Vistry supports Policy SPA6 and recognises the need for the Council to plan positively for one of the UK's leading institutions for land-based studies. ARU Writtle is also a key driver for the local economy creating jobs locally and providing patronage for local shops and services. As a Tier 2 settlement within the Settlement Hierarchy offering a wider variety of services and facilities, with excellent sustainable transport links to the City Centre, Writtle is well placed to attract students and employees. However, the scope to provide the range and quantum of homes need to support ARU Writtle is severely curtailed by the Council's decision not to review Green Belt boundaries when undertaking the Local Plan Review. As such, housing provision will continue to be overly focused in the northern and eastern part of the Borough to the exclusion of communities such as Writtle with severely limited choice in the housing market."

2.18 The sustainability credentials of Writtle are clear and more so than the lower tier settlements of Ford End, Rettendon Place and Woodham Ferrers. The IIA that has been prepared in support of both the Pre-Submission Local Plan and this Focused Consultation has been done so on the basis of a fundamentally flawed approach to its assessment of the Green Belt that exists within the District, and of the settlements situated within the Green Belt. That flawed approach stems entirely from the City Council discounting options for any form of sustainable development at settlements within the Green Belt at an early

stage based on the available evidence. The available evidence of course does not include any Green Belt Review, and the IIA has been progressed without being able to assess options on any land within the Green Belt that extends across 36% of the City Council's area. So, as with the draft Local Plan itself, the IIA only represents a partial picture of the opportunities for sustainable patterns of growth that exist in Chelmsford, with Writtle perhaps being the most obvious example where both the draft Plan and its accompanying IIA have overlooked a settlement which is demonstrably far more sustainable than the three settlements highlighted above. The key aspects of greater sustainability for the settlement of Writtle, and specifically for this site, are described in the following paragraphs.

The Case for the Land South of Writtle and North of the A414

2.19 As set out within previous representations submitted on behalf of Vistry, the case for allocating the site is clear. Located adjacent to the village of Writtle, a Key Service Settlement within close proximity to the City Centre, the site is within an inherently sustainable location. As reflected by its status within the settlement hierarchy, Writtle contains a range of facilities and amenities that would support a residential led development on this site, with regular bus services along Lodge Road providing direct access into the City Centre, where an extensive range of additional facilities and amenities can be found.

2.20 Within the previously submitted Vision Document, it set out the following vision for the site:

“To create a place that is unique, innovative, community focused and sustainable, which will meet the needs of existing and future residents but also safeguard the city centre by delivering much needed strategic blue and green infrastructure that responds to the growing challenges of climate change and the aspirations of Chelmsford City Council.”

2.21 This vision refers to the safeguarding of the City Centre, where there are recognised flooding issues. This site is uniquely located, insofar as the River Wid passes by it, which in turn connects to the River Can to the north, which then runs into the City Centre. In accordance with the Plans policy and wider aspirations of CCC to minimise the risk of flooding and improve the river environment (as per the Rivers and Waterways Plan prepared by the Council's Waterways Working Group in 2022), the site provides the opportunity to implement natural flood management techniques, linked to a development proposal, which could address the risk of flooding in the City Centre, but also contribute towards various objectives of the Rivers and Waterways Plan, including extending and improving green spaces adjoining the River Wid, enhancing the biodiversity value of this river corridor and improving public access.

2.22 As set out above, it is considered imperative that CCC undertake a Green Belt Review to not only confirm whether the Green Belt designation still remains appropriate across the entirety of the Chelmsford administrative area, but also whether sustainable sites could come forward for development without undermining the purposes of the remaining Green Belt. A Green Belt Review would provide the opportunity for the Council to establish what

land could be classified as Grey Belt, where it would not be inappropriate to provide development, so long as the relevant provisions of the NPPF are satisfied.

2.23 At a high level, there is a clear case that the site could be classified as Grey Belt. The Grey Belt concept that has been introduced into National policy is defined as previously developed land and/or any other land that does not contribute strongly to the following Purposes (A, B and D) of the Green Belt, as listed in Paragraph 143 of the NPPF:

- A) to check the unrestricted sprawl of large built-up areas;
- B) to prevent neighbouring towns merging into one another; and
- C) to preserve the setting and special character of historic towns.

2.24 Grey Belt excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development. Should land be found to be considered as Grey Belt, its development for homes should not be regarded as inappropriate anymore, so long as the other requirements of the NPPF are satisfied.

2.25 Given that the site is located adjacent to the village of Writtle and not a town, it is considered that these purposes would not be applicable (as specified within the PPG) and therefore the site cannot contribute strongly to these purposes. Furthermore, taking into account the area of the site compared to that of the wider Green Belt across the Plan area, it cannot be said that its development would fundamentally undermine the purposes of the remaining Green Belt.

2.26 The site is not or does not contain any of the designations set out within Footnote 7 of the NPPF, with the exception of small areas of surface water flooding. However, through the careful masterplanning of the site, built development or important infrastructure could either avoid these areas, or the surface water flooding could be attenuated through on site infrastructure, and therefore this would not provide a strong reason to restrict development. By consequence, the site could meet the definition of Grey Belt and is fully capable of adhering to the Golden Rules set out in the NPPF.

2.27 The site is clearly within a sustainable location and its development would provide a much needed boost in supply for the village of Writtle, including the nearby ARU campus. The site is clearly Grey Belt, where the development of homes should not be regarded as inappropriate. The purpose of the Grey Belt concept is to boost the supply of housing and make it easier for sites to come forward, to meet the needs of the country. As outlined above, it is our client's case that a Green Belt Review must now be undertaken by the City Council in order to establish a Spatial Strategy that provides suitable, sustainable housing allocations that meet the District's housing requirements, as set out in national policy. We shall seek the Inspector's endorsement of that clear necessity, and request that the Examination be paused to allow such a Review to be undertaken, which may demonstrate that there will not be a requirement to allocate some of the additional sites now being proposed at unsustainable locations through this current consultation, and that sites, such

	<p>as the site which is the subject of these representations, be allocated for development and housing delivered in the short-term.</p> <p>(Complete representation attached - 1396287AS-A.pdf)</p>
Question 4 - Executive Summary	<p>Conclusion</p> <p>3.1 These representations are submitted in response to the Chelmsford Local Plan Review Additional Sites Consultation and specifically in respect of the land to the south of Writtle and north of the A414. Our client also has interests in land at nearby Skeggs Farm, Chelmsford. Whilst these two sites are being promoted separately and could be delivered independently of one another, there is also an opportunity to combine them to create a comprehensive development that would offer integrated and strategic benefits for the benefit of Writtle and the wider Chelmsford City area. In any event, the site is within Vistry's control and considered to be deliverable within the early stages of the Local Plan Review period and form an important part of the Council's 5YHLS.</p> <p>3.2 As set out within previous representations submitted on behalf of Vistry, there are Exceptional Circumstances that justify a Green Belt Review in Chelmsford. This would provide a comprehensive, evidence-based assessment that would help to determine the most suitable and sustainable pattern of development and to identify the most appropriate land to meet the Strategic Priorities of the Plan. Furthermore, without taking a Green Belt Review, CCC simply cannot know whether the land designated as Green Belt continues to meet the aim of designating such land and whether it would identify parcels of land that would offer a more sustainable approach that the Spatial Strategy currently proposes.</p> <p>3.3 Whilst the Plan's Spatial Strategy may have proved to be effective previously, it has now lost its efficacy by the proposed allocation of a series of new sites in unsustainable locations, contrary to the underlying principles of the Spatial Strategy. There is therefore a risk that the Plan will not be found sound, because it does not offer an appropriate strategy, taking into consideration the reasonable alternative of reviewing Green Belt boundaries.</p> <p>3.4 We are of the firm opinion that the site should be allocated within the Plan, given that it can be defined as Grey Belt and could be delivered without fundamentally undermining the purposes of the remaining Green Belt in Chelmsford, whilst delivering a truly sustainable development that can assist with the Council's wider aspirations to reduce flood risk in the City Centre and improve the river environment along the River Wid.</p>
Attachment/s	1396287AS-A.pdf
ID	ASIIA-45
Person ID	1396287
Full Name	
Company / Organisation	Vistry Strategic Land
Consultation point - Please state clearly the relevant	Section 2 - paragraph 2.2.5

<p>paragraph/table/figure/appendix of the IIA your comment relates to:</p>	
<p>Question 1</p>	<p>No</p>
<p>Question 2 - Please provide an explanation below:</p>	<p>These representations concern land north east of Skeggs Farm, Chelmsford (previously assessed by the City Council under reference CFS113 – ‘the site’). Our client also has interests in land to the south of Writtle and north of the A414 (Rollestons Farm), Writtle (previously assessed under reference CFS129). Whilst these two sites are being promoted separately and could be delivered independently of one another, there is also an opportunity to combine them to create a comprehensive development that would offer integrated and strategic benefits for the benefit of Writtle and the wider Chelmsford City area.</p> <p>The site is suitable for development, within Vistry’s control and is therefore immediately available, and is free from constraints that would make development unachievable beyond the flood zone associated with the River Wid and part of the Writtle Bridge Meadows Local Wildlife Site, which could form part of the site’s green and blue infrastructure strategy in any instance. The site is considered to be deliverable within the early stages of the Local Plan Review period and could form an important part of the Council’s five-year housing land supply (5YHLS), which is the purpose of this Additional Sites Consultation. (Additional detail on the Site in attachment 1396287AS-B.pdf).</p> <p>Proposed Site Allocations and the Integrated Impact Assessment</p> <p>2.14 As outlined above (Additional detail on the Site in attachment 1396287AS-B.pdf), we are of the opinion that the Additional Sites Document is now proposing the allocation of a series of new sites in unsustainable locations, contrary to the underlying principles of the Spatial Strategy. Most notably, these are the allocations at Ford End (GS14b – 75 units), Rettendon Place (SGS20 – 350 units) and Woodham Ferrers (GS21a and GS21b – 15 units at each site).</p> <p>2.15 All three of these settlements are identified as ‘Service Settlements’ within the Plan’s settlement hierarchy, which as stated at paragraph 3.30 of the consultation document, “Service Settlements have more limited services and facilities but typically include primary schools, convenience shopping facilities and community facilities making them suitable for a more limited scale of development”. Despite being identified for more limited development, the Plan seeks to direct 75 units to Ford End, 30 units to Woodham Ferrers and an astonishing 350 units to Rettendon Place. As recognised by the Plan, these settlements have limited services and facilities, and therefore any future development here will be contrary to the Plan’s Strategic Priorities and Spatial Principles, including in respect of the promotion of sustainable transport and ensuring sustainable patterns of development.</p> <p>2.16 As a result of the Council’s reluctance to direct any growth to sites within the Green Belt, there are sites that are clearly within sustainable locations are being overlooked. The land</p>

at Skeggs Farm is located directly adjacent to the Westlands Estate, which forms part of Chelmsford City Centre, as shown on the Local Plan Policies Map. The consultation document recognises that the City of Chelmsford is at the top of the settlement hierarchy, alongside South Woodham Ferrers. These are “considered the most sustainable as they have the most functions and the best services and facilities including transport links and employment opportunities. They also have the most potential to provide new infrastructure. Accordingly, most new development over the Local Plan period is proposed in and around these settlements”.

2.17 Whilst forming a logical extension to the Chelmsford City Centre area, the site is also within close proximity to the Key Service Settlement of Writtle, which continues to receive no additional growth, despite the consultation document recognising its importance (paragraph 3.29) as follows:

“Key Service Settlements provide a range of services and facilities for their residents. These include primary school provision, local employment opportunities, convenience shopping facilities, community facilities, good links by public transport to higher order settlements, good access to the strategic road network, and in most cases primary healthcare provision. These Key Service Settlements will be the focus for housing provision outside Chelmsford and South Woodham Ferrers, with a higher level of growth due to their higher level of services, facilities and economic activity. Growth in Key Service Settlements aims to increase their self-containment and enhance their service role, reflecting the aspirations of national policy in promoting stronger communities.”

2.18 In addition, the village of Writtle is in the unique position of being within close proximity to the Anglian Ruskin University Writtle, which is allocated a Special Policy Area, given its importance as a key employer and higher education facility within Chelmsford. We again re-emphasise and endorse the following extract taken from the first Regulation 19 representations submitted on behalf of Vistry in respect of Policy SPA6 (ARU Writtle Special Policy Area):

“Vistry supports Policy SPA6 and recognises the need for the Council to plan positively for one of the UK’s leading institutions for land-based studies. ARU Writtle is also a key driver for the local economy creating jobs locally and providing patronage for local shops and services. As a Tier 2 settlement within the Settlement Hierarchy offering a wider variety of services and facilities, with excellent sustainable transport links to the City Centre, Writtle is well placed to attract students and employees. However, the scope to provide the range and quantum of homes need to support ARU Writtle is severely curtailed by the Council’s decision not to review Green Belt boundaries when undertaking the Local Plan Review. As such, housing provision will continue to be overly focused in the northern and eastern part of the Borough to the exclusion of communities such as Writtle with severely limited choice in the housing market.”

2.19 The sustainability credentials of the site is clear and more so than the proposed allocations

at the lower tier settlements of Ford End, Rettendon Place and Woodham Ferrers. The IIA that has been prepared in support of both the Pre-Submission Local Plan and this Focused Consultation has been done so on the basis of a fundamentally flawed approach to its assessment of the Green Belt that exists within the District, and of the settlements situated within the Green Belt. That flawed approach stems entirely from the City Council discounting options for any form of sustainable development within the Green Belt at an early stage based on the available evidence. The available evidence of course does not include any Green Belt Review, and the IIA has been progressed without being able to assess options on any land within the Green Belt that extends across 36% of the City Council's area. So, as with the draft Local Plan itself, the IIA only represents a partial picture of the opportunities for sustainable patterns of growth that exist in Chelmsford, with land parcels to the south-west of the Chelmsford Urban Area, including Writtle, perhaps being the most obvious examples where both the draft Plan and its accompanying IIA have overlooked locations which are demonstrably far more sustainable than the three settlements highlighted above. The key aspects of greater sustainability for this site are described in the following paragraphs.

The Case for the Land North East of Skeggs Farm, Chelmsford

2.20 As set out within previous representations submitted on behalf of Vistry, the case for allocating the site is clear. Located adjacent to the existing Westlands Estate, which forms part of the defined Chelmsford City Centre Urban area, the site is within an inherently sustainable location. As reflected by its status within the settlement hierarchy, Chelmsford is the most sustainable settlement within the District, providing the best services and facilities, including transport links and employment opportunities. Even though the site is at the edge of the City Centre area, it is possible to walk, cycle or use public transport to the various services and facilities on offer, not only in the City Centre, but also in the Key Service Settlement of Writtle, including ARU Writtle. There are significant employment opportunities at the nearby Waterhouse Business Centre and Widford Industrial Estate. The site is located within a truly sustainable location and would form a logical extension to the City Centre.

2.21 Within the previously submitted Vision Document, it set out the following vision for the site:

"To create a place that is unique, innovative, community focused and sustainable, which will meet the needs of existing and future residents but also safeguard the city centre by delivering much needed strategic blue and green infrastructure that responds to the growing challenges of climate change and the aspirations of Chelmsford City Council."

2.22 This vision refers to the safeguarding of the City Centre, where there are recognised flooding issues. This site is uniquely located, insofar as the River Wid passes by it, which in turn connects to the River Can to the north, which then runs into the City Centre. In accordance with the Plans policy and wider aspirations of CCC to minimise the risk of flooding and improve the river environment (as per the Rivers and Waterways Plan

prepared by the Council's Waterways Working Group in 2022), the site provides the opportunity to implement natural flood management techniques, linked to a development proposal, which could address the risk of flooding in the City Centre, but also contribute towards various objectives of the Rivers and Waterways Plan, including extending and improving green spaces adjoining the River Wid, enhancing the biodiversity value of this river corridor and improving public access.

2.23 As set out above, it is considered imperative that CCC undertake a Green Belt Review to not only confirm whether the Green Belt designation still remains appropriate across the entirety of the Chelmsford administrative area, but also whether sustainable sites could come forward for development without undermining the purposes of the remaining Green Belt. A Green Belt Review would provide the opportunity for the Council to establish what land could be classified as Grey Belt, where it would not be inappropriate to provide development, so long as the relevant provisions of the NPPF are satisfied.

2.24 At a high level, there is a case that the site could potentially be classified as Grey Belt; however, this would need to be substantiated further through the preparation of a Green Belt Review either in support of the Local Plan Review or a planning application. The Grey Belt concept that has been introduced into National policy is defined as previously developed land and/or any other land that does not contribute strongly to the following Purposes (A, B and D) of the Green Belt, as listed in Paragraph 143 of the NPPF:

- A) to check the unrestricted sprawl of large built-up areas;
- B) to prevent neighbouring towns merging into one another; and
- C) to preserve the setting and special character of historic towns.

2.25 Grey Belt excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development. Should land be found to be considered as Grey Belt, its development for homes should not be regarded as inappropriate anymore, so long as the other requirements of the NPPF are satisfied.

2.26 Despite the current lack of a Green Belt Review, it is likely that Chelmsford would be defined as a 'large built-up area'. Whilst the site is located immediately adjacent to the Chelmsford City Urban Area and its partial development would result in an element of outward sprawl from the existing built edge, it is not considered that this sprawl would be 'unrestricted'. The circumstances of this site are such that it is defined and therefore well contained by the River Wid and its associated flood zone on its western boundary and this would therefore have the effect of restricting any development that takes place along the eastern and central parts of the site.

2.27 In terms of purpose b), whilst being located between Chelmsford and Writtle, Writtle is identified as a village and therefore this purpose would not be applicable (as specified within the PPG) and therefore the site cannot contribute strongly to this purpose. In any event, a degree of separation would still be maintained as a result of the abovementioned

buffer provided by the River Wid.

2.28 The area of the site proposed to be developed is not located adjacent to a Conservation Area, listed buildings or any other designated heritage asset and therefore it is not considered that the site contributes strongly to purpose c).

2.29 Taking into account the area of the site compared to that of the wider Green Belt across the Plan area, it cannot be said that its development would fundamentally undermine the purposes of the remaining Green Belt.

2.30 The site is not or does not contain any of the designations set out within Footnote 7 of the NPPF, with the exception of small areas of Flood Zone 2/3 associated with the River Wid, small areas of surface water flooding and in the most western parts of the site is land identified as 'open space' on the Local Plan Policies Map (corresponding with part of the Writtle Bridge Meadows Local Wildlife Site). However, through the careful masterplanning of the site, built development or important infrastructure could avoid these areas and they could form part of the site's green and blue infrastructure strategy. Surface water flooding could also be attenuated through on-site infrastructure. These designations therefore do not provide a strong reason to restrict development. By consequence, the site could potentially meet the definition of Grey Belt and is fully capable of adhering to the Golden Rules set out in the NPPF.

2.31 The site is clearly within a sustainable location and its development would provide a much needed boost in supply for this western part of Chelmsford and the village of Writtle including the nearby ARU campus. The site could potentially be considered Grey Belt, where the development of homes should not be regarded as inappropriate. The purpose of the Grey Belt concept is to boost the supply of housing and make it easier for sites to come forward, to meet the needs of the country. If however, the site is not considered to be Grey Belt, there is still a strong case for its release from the Green Belt, as a highly sustainable site for a residential-led development. As outlined above, it is our client's case that a Green Belt Review must now be undertaken by the City Council in order to establish a Spatial Strategy that provides suitable, sustainable housing allocations that meet the District's housing requirements, as set out in national policy. We shall seek the Inspector's endorsement of that clear necessity, and request that the Examination be paused to allow such a Review to be undertaken, which may demonstrate that there will not be a requirement to allocate some of the additional sites now being proposed at unsustainable locations through this current consultation, and that sites, such as the site which is the subject of these representations, be allocated for development and housing delivered in the short-term.

(Complete representation attached - 1396287AS-B.pdf)

Question 4 - Executive Summary

Conclusion

3.1 These representations are submitted in response to the Chelmsford Local Plan Review Additional Sites Consultation and specifically in respect of the land at Skeggs Farm,

Chelmsford. Our client also has interests in land nearby to the south of Writtle and north of the A414. Whilst these two sites are being promoted separately and could be delivered independently of one another, there is also an opportunity to combine them to create a comprehensive development that would offer integrated and strategic benefits for the benefit of Writtle and the wider Chelmsford City area. In any event, the site is within Vistry's control and considered to be deliverable within the early stages of the Local Plan Review period and form an important part of the Council's 5YHLS.

3.2 As set out within previous representations submitted on behalf of Vistry, there are Exceptional Circumstances that justify a Green Belt Review in Chelmsford. This would provide a comprehensive, evidence-based assessment that would help to determine the most suitable and sustainable pattern of development and to identify the most appropriate land to meet the Strategic Priorities of the Plan. Furthermore, without taking a Green Belt Review, CCC simply cannot know whether the land designated as Green Belt continues to meet the aim of designating such land and whether it would identify parcels of land that would offer a more sustainable approach that the Spatial Strategy currently proposes.

3.3 Whilst the Plan's Spatial Strategy may have proved to be effective previously, it has now lost its efficacy by the proposed allocation of a series of new sites in unsustainable locations, contrary to the underlying principles of the Spatial Strategy. There is therefore a risk that the Plan will not be found sound, because it does not offer an appropriate strategy, taking into consideration the reasonable alternative of reviewing Green Belt boundaries.

3.4 We are of the firm opinion that the site should be allocated within the Plan, given that it could potentially be defined as Grey Belt and could be delivered without fundamentally undermining the purposes of the remaining Green Belt in Chelmsford, whilst delivering a truly sustainable development that can assist with the Council's wider aspirations to reduce flood risk in the City Centre and improve the river environment along the River Wid.

Attachment/s

[1396287AS-A.pdf](#)
[1396287AS-B.pdf](#)

ID	ASIIA-37
Person ID	1329392
Full Name	
Company / Organisation	Wates Developments Limited
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Table A1
Question 2 - Please provide an explanation below:	<p>The land parcel under the control of Wates (CFS 52) lies to the south of the B1137 and is identified as Briars Farm, Main Road, Boreham in the SHELAA. The land parcel under the control of Gladman (CFS 145) lies east of Orchard Way and is identified in the SHELAA as Land East of Plantation Road. The combined site is as shown in the plan extract set out on the preceding contents page and at Appendix 2 (see C1329392AS-A.png) of these submissions.</p> <p>In our previous Regulation 18 and 19 submissions, we highlighted concerns in relation to the lack of an assessment of strategic growth at Boreham as a spatial option and the general approach taken in relation to the SHELAA assessment of Site CFS 52. Wates are therefore disappointed, that the Sustainability Appraisal (SA) and the Integrated Impact Assessment (IIA) have continued to progress a spatial strategy which does not include any strategic residential growth at Boreham (other than the 82 new homes set out above) despite the status of Boreham as a KSS and its proximity to other major residential and employment allocations, east of Chelmsford.</p> <p>Whilst two of the identified spatial approaches in the Issues and Options Consultation considered the prospect of growth at Boreham as part of the emerging spatial strategy (Options A and C) we noted in previous submissions that the Sustainability Appraisal (SA) did not test any of these strategic growth options for Boreham. To date, this has not been remedied and so it is advocated that as part of meeting its housing needs in full, that Options A and C (or equivalent new options) are also tested, to help formulate a more diverse spatial strategy to help deliver the additional new homes required.</p>
Question 4 - Executive Summary	<p>Whilst Wates continues to be supportive of the Pre-Submission Local Plan in principle, Wates are disappointed that at this stage of the Local Plan that the combined promotion Site, set out at Appendix 1 (see C1329392AS-B.pdf), has not been assessed by the Council, as part of the updated SHELAA process, notwithstanding our previous Regulation 18 and 19 submissions, our Concept Masterplan and the pre-application engagement with the Council by Wates.</p> <p>In terms of the Spatial Strategy, Wates are similarly disappointed, that the SA and the IIA have continued to progress a Borough development strategy which does not include any strategic residential growth at Boreham, despite its status as a sustainable KSS and</p>

	<p>its proximity to other major residential and employment allocations, east of Chelmsford. The Council are therefore strongly urged to reconsider the status of Boreham and its ability to accommodate a greater strategic scale of growth, to the east of the settlement. In particular, to assess the combined site proposal set out in these representations and to allocate strategic growth on land to the east of Boreham for up to 1,000 new homes, by way of a proposed main modification to the Local Plan.</p>
Attachment/s	<p>C1329392AS-A.png C1329392AS-B.pdf</p>

ID	ASIIA-1
Person ID	1392626
Title	Mr
Given Name	Tom
Family Name	Welsh
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	Appendix D
Question 3	Maybe. Appendix D, tables D2 - D5 go into significant detail in relation to the Additional 14 Shelaa sites that have been identified. However, I cannot see anywhere the same detailed analysis of the existing sites that have been allocated greater numbers (in particular Growth Site 14b - Ford End). Without that analysis it is hard to assess whether or not the additional allocations (75 up from 20 in Ford End) have been treated or measured fairly. Please advise.

ID	ASIIA-10
Person ID	1397392
Full Name	Nick Wood
Consultation point - Please state clearly the relevant paragraph/table/figure/appendix of the IIA your comment relates to:	STRATEGIC GROWTH SITE POLICY 11c – LAND WEST OF BARBROOK WAY, BICKNACRE
Question 1	No
Question 2 - Please provide an explanation below:	<p>Existing amenities are not sufficient for current needs, particularly the doctor's surgery and transport links. With the addition on 20 houses this would have caused addition problems; with the addition of 250 houses the doctor's surgery has said it cannot take additional patients and the transport links would cause serious congestion and danger to school children and other vulnerable people who walk through the village.</p> <p>The isolation of the new estate will mean that a car will be necessary for any journey, even to the school, doctors, shops, pubs. ? An estate of 250 houses will mean a huge proportionate number of cars, delivery vans and vehicles while the estate is under construction.</p> <p>There will be an issue with surface water and sewerage. Considerable work will need to be done to stop the effects of water collecting in the proposed area – i.e. significant water courses or ponds will have to be constructed– who will maintain these? Will the knock-on effect of hard standing areas, roads, etc. be assessed and adequate measures put in place to deal with this. The sewage drains do not have capacity for the number of new houses proposed so a new drainage system along Bicknacre Road will be required connecting to the Chelmsford treatment plant. Will this be done as part of the construction of the estate?</p>



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