SD 008

Chelmsford Draft Local Plan: Pre-Submission Consultation Document

Sustainability Appraisal Report and Habitats Regulations Assessment Report – Feedback Report

1. Introduction

1.1 Chelmsford Pre-Submission Local Plan

The Chelmsford Local Plan will be a new single planning policy document. It will set out how much new development will be delivered in Chelmsford City Council's (the Council) administrative area in the period up to 2036 and where this growth will be located. It will also contain planning policies and site allocations. For brevity, the term 'the City Area' is used throughout this document to describe the Council's administrative area.

The first stage in the development of the Local Plan was the publication of the Chelmsford Local Plan Issues and Options Consultation Document (the Issues and Options Consultation Document) that was consulted on between 19th November 2015 and 21st January 2016. The Issues and Options Consultation Document set out, and sought views on, the planning issues that face Chelmsford over the next 15 years and options for the way they could be addressed in terms of the amount and broad location of future development in the City Area. Following consideration of the comments received as part of that consultation, ongoing engagement and further evidence base work, the Council selected its preferred options for the Local Plan in terms of the amount and location of growth to be delivered in the City Area up to 2036 and which formed the Chelmsford Draft Local Plan Preferred Options Consultation Document (the Preferred Options Consultation Document). The Preferred Options Consultation Document was published for consultation between 30th March and 11th May 2017 and included the draft Local Plan Strategic Priorities, Vision and Spatial Principles, development requirements and Spatial Strategy, proposed site allocations and plan policies.

The Preferred Options Consultation Document was subsequently revised to reflect representations received during consultation, new evidence and the recommendations of its accompanying Sustainability Appraisal (SA) and in January 2018, the Pre-Submission Local Plan was published for consultation. The Pre-Submission Local Plan includes the following key parts:

- Local Plan Strategic Priorities, reflected in the Vision and Spatial Principles;
- the overarching Local Plan strategy in terms of the amount of new development to be accommodated in the City Area (development requirements) and how it will be accommodated (the Spatial Strategy);
- proposed site allocations to deliver the development requirements across three Growth Areas; and

- plan policies including development requirements for the proposed site allocations.

The Pre-Submission Local Plan was issued for consultation between 31st January and 14th March 2018.

1.2 Sustainability Appraisal Report

The Council is required to carry out a SA of the Local Plan[1]. SA is a means of ensuring that the likely social, economic and environmental effects of the Local Plan are identified, described and appraised and also incorporates a process set out under a European Directive[2] and related UK regulations[3] called Strategic Environmental Assessment (SEA).

SA is an iterative process and in this context, Amec Foster Wheeler Environment and Infrastructure UK Ltd (Amec Foster Wheeler, now Wood) carried out appraisals of the Issues and Options Consultation Document[4], the Preferred Options Consultation Document[5] and, most recently, the Pre-Submission Local Plan[6], focusing on the key plan elements listed in **Section 1.1**.

The findings of the SA of the Pre-Submission Local Plan were presented in a SA Report that was published for consultation alongside the Pre-Submission Local Plan in January 2018.

1.3 Habitats Regulations Assessment

The Conservation of Habitats and Species Regulations 2017 requires local authorities to assess the potential impacts of land use plans on the Natura 2000 network of European protected sites to determine whether there will be any likely significant effects as a result of the plan's implementation. This process is known as Habitats Regulations Assessment (HRA).

Alongside the SA, a HRA providing a conclusion on the likely effects of the Local Plan was undertaken based on the policies and proposals contained in the Pre-Submission Local Plan. The findings of this assessment were presented in a HRA Report[7] that was also published for consultation in January 2018 alongside the Pre-Submission Local Plan.

2. Consultation Overview

2.1 Responses

A total of 62 responses were received from 46 respondents who provided comments on the Pre-Submission Local Plan SA Report and its Non-Technical Summary (although it should be noted that in many instances, the response received principally related to the Pre-Submission Local Plan itself as opposed to the SA Report). **Table 2.1** provides a breakdown of the type of respondent.

[1] The requirement for SA of local plans is set out under section 19(5) of the Planning and Compulsory Purchase Act 2004.
[2] Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.
[3] Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633).
[4] Amec Foster Wheeler (2015) *Chelmsford Local Plan Issues and Options Consultation Document: Sustainability Appraisal Report.*
[5] Amec Foster Wheeler (2017) *Chelmsford Draft Local Plan: Preferred Options Consultation Document Sustainability Appraisal Report*.
[6] Amec Foster Wheeler (2018) *Chelmsford Pre-Submission Local Plan Sustainability Appraisal Report.*
[7] Amec Foster Wheeler (2018) *Chelmsford Pre-Submission Local Plan Habitats Regulations Assessment Screening Report*

Table 2.1 Type of SA Report Respondent

Type of Respondent	Number of Respondents
Parish/town councils or adjoining local authorities	8
Developers or representatives	11
Other agencies and authorities	4
Members of the public	23

Ten respondents provided twelve comments on the Pre-Submission Local Plan HRA Report (although again, the majority of the response received principally related to the Pre-Submission Local Plan itself as opposed to the HRA Report). **Table 2.2** provides a breakdown of the type of respondent.

Table 2.2 Type of HRA Report Respondent

Type of Respondent	Number of Respondents
Parish/town councils or adjoining local authorities	3
Developers or representatives	1
Other agencies and authorities	1
Members of the public	5

2.2 Main Issues Raised

SA Report

The main issues raised by respondents with regard to the SA Report concern:

- The treatment of reasonable alternatives to the Spatial Strategy considered as part of the SA process;
- The findings of the appraisal of the Spatial Strategy and reasonable alternatives with specific regard to the identification of the best performing options;
- The findings of the appraisal with regard to specific site allocations and reasonable alternatives;
- The need to take into account information submitted by developers and mitigation in the appraisal of sites;
- Infrastructure provision to accommodate new development;
- The rationale provided for the selection of preferred options and rejection of alternatives;
- The identification of further alternative sites for appraisal;
- The overall sustainability of the Pre-Submission Local Plan.

A detailed summary of responses received to the SA Report is contained in **Section 3**.

HRA Report

The main issues raised by respondents with regard to the HRA Report concern:

- Ensuring the commitment to the Essex Recreational disturbance Avoidance and Mitigation Strategy (Essex RAMS) is reflected in the relevant policies of the Local Plan, rather than the supporting text;
- Wastewater treatment capacity at Great Leighs and South Woodham Ferrers;
- The importance of areas south and east of South Woodham Ferrers for brent geese;
- Impacts to designated sites due to changes in water resources.

A detailed summary of responses received to the HRA Report is contained in **Section 4**.

3. Schedule of Responses to the Sustainability Appraisal Report

Ref	Consultee	Consultee Response Summary	Response/Action
PS SA25	Terence O'Rourke Ltd and Jam Consulting Ltd on behalf of Hammonds Estate LLP *(It should be noted that the consultee's response is contained in the document entitled 'Response to Pre-Submission Document' together with nine supporting appendices. Appendix 1 specifically comprises a review of the Chelmsford Local Plan Sustainability Appraisal (SA). This provides additional detail to the points set out in the main report. To avoid undue repetition, key points from both the Response to Pre-Submission Document and Appendix 1 are drawn together here and presented in accordance with the stages of the SA process. The exception to this concerns the treatment of alternatives in the SA which is an issue raised frequently at all assessment stages in both documents. As a result, this issue is considered at the outset to provide the context for subsequent responses).*	**Equal Treatment of Reasonable Alternatives** The respondent states on a number of occasions that the Hammonds Farm site has not been assessed with mitigation applied. The respondent considers that: • As Hammonds Farm has not been assessed with mitigation, it has not been assessed equally compared to the preferred options; and • The SA does not meet regulatory requirements as it has not considered such mitigation. In this context, the respondent states: "*The SA has not appraised all reasonable alternatives in the same level of detail as the preferred approach; only the preferred options have included mitigation measures and cumulative effects. The alternative spatial strategies received very similar scores before mitigation was applied and the reasons for the selection of the Preferred Strategy are not supported by the evidence. A proper comparison of the results cannot be made and the SA is therefore not compliant with the regulations or guidance*." The respondent also states: "*Whilst the initial assessment of sites and alternatives without mitigation is understood and is compliant with the regulations and guidance, the SA should then have considered the implications of mitigation measures upon the options. Given the very slight difference in the results between the two spatial options, an assessment of the alternatives with 'mitigation on' should have been carried out. The results are a misrepresentation of the facts and fail to demonstrate a transparent approach*". Consequently, the respondent contends that the SA process does not meet the requirements of *The Environmental Assessment of Plans and Programmes Regulations 2004* (the SEA Regulations), National Planning Practice Guidance (NPPG) or the National Planning Policy Framework (NPPF).	Disagree. The SA has appraised all reasonable alternatives in the same manner, and to the same depth, at both the strategic and site level. In this context, the proposed Hammonds Farm site referred to in this response has been appraised as both an alternative Spatial Strategy option and as an individual site allocation option. The alternative Spatial Strategy options identified for appraisal during the SA process are described in Section 5.3 of the Pre-Submission Local Plan SA Report (January 2018) (the 2018 SA Report) with the reasons for their rejection set out in Appendix F; the options appraised include 'Urban Focus with Growth at Hammonds Farm and Key Service Settlements' which included the proposed Hammonds Farm site. The findings of the appraisal of this option are contained in Appendix F to the Preferred Options Consultation Document SA Report (March 2017) (the 2017 SA Report). The respondent states that the "*alternative spatial strategies received very similar scores before mitigation was applied and the reasons for the selection of the Preferred Strategy are not supported by the evidence. A proper comparison of the results cannot be made and the SA is therefore not compliant with the regulations or guidance*." This is incorrect. The approach to assessing the Spatial Strategy options (including the preferred option and reasonable alternatives) identified by the Council has been consistent and has followed the methodology detailed in Section 4.3 of the 2018 SA Report. To confirm, the appraisal of these options, including the preferred Spatial Strategy option, has not taken into account the mitigation provided by the draft Local Plan policies in order to ensure that all options are treated equally. Paras 5.3.59 of the 2017 SA Report state "*…there is considered to be greater uncertainty with regard to the deliverability of this alternative … and, relative to the preferred Spatial Strategy, the potential for significant landscape effects is considered to be greater. Further, as this option would involve the creation of a new settlement that is detached from the existing urban area, accessibility to key services, facilities and employment opportunities would*

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			be reduced." Para 5.3.60 concludes "*Overall, when compared to the preferred Spatial Strategy, the findings of the SA indicate that this alternative spatial strategy performs less well in terms of its sustainability.*" Hammonds Farm has also been appraised as a site allocation (CFS 83 'Land West of the A12 and East of Sandford Mill Road'). The full appraisal of this site and the other reasonable alternatives identified by the Council can be found in Appendix G of the 2018 SA Report together with the reasons for the selection of the proposed site allocations and for the rejection of alternatives. All of the proposed site allocations and reasonable alternatives including Hammonds Farm have been appraised against the SA objectives that comprise the SA Framework using tailored appraisal criteria and associated thresholds of significance, as per the approach set out in Section 4.3 of the 2018 SA Report. In all instances, the methodology has been applied consistently to all sites and has not taken into account the mitigation that could be provided by the draft Local Plan policies. In this regard, para 4.3.11 of the 2018 SA Report states "*It should be noted that the site appraisal does not take into account the provisions of the associated site allocation policies contained in Chapter 7 of the Pre-Submission Local Plan nor the mitigation provided by the other proposed Local Plan policies contained in the document. This is to ensure that all sites are considered equally.*" Chapter 7 of the Pre-Submission Local Plan includes policies that are area/site specific and which have been appraised separately (see Appendix I of the 2018 SA Report). Those policies that relate to specific site allocations have been assessed by taking forward the findings of the site appraisal (Appendix G) and applying the associated development requirements (as set out in the related policies). This has enabled consideration of the extent to which the *policies* of Chapter 7 may help to mitigate adverse effects and enhance positive effects associated with the delivery of the proposed site allocations and, subsequently, the identification of where there would be residual significant effects. It is important to recognise that the appraisal presented in Appendix I is of the proposed Chapter 7 policies as opposed to a further (re)appraisal of site allocations. The appraisal of these policies has not informed the

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			Council's selection of the proposed site allocations nor have the policies been taken into account in the site appraisal (Appendix G). In this context, as Hammonds Farm has not been taken forward by the Council as a site allocation and does not therefore have an associated policy, it is not included within the matrices in Appendix I. The respondent states that the requirements of Schedule 2 (7) of the SEA Regulations and paragraph 018 of the NPPG on SEA/SA have not been met as mitigation measures have not been taken into account in the site appraisal. For the avoidance of doubt, the mitigation measures that the respondent is referring to are the development proposals for Hammonds Farm, which the respondent would like included within the assessment as they contend that this would lead to a more favourable appraisal of Hammonds Farm. It would be inappropriate to accept mitigation proposed by a developer as site submissions received by the Council during the preparation of the Local Plan are accompanied by proposals of differing level of detail and commitment. In addition, there are no certainties that proposals made in regard to mitigation at the site allocation stage will become fact, prior to consideration through the planning application process. To ensure all sites are considered in the same manner, mitigation proposals are therefore excluded from the site appraisal and SHLAA process. However, where factual (baseline) information has been provided by developers, this has informed the SA. In accordance with the SEA Regulations, measures have been identified to mitigate adverse effects and enhance positive effects associated with the emerging Local Plan throughout the SA process, as summarised in Section 5.7 of the SA Report. With specific regard to Hammonds Farm, the appraisal of the spatial option 'Urban Focus with Growth at Hammonds Farm and Key Service Settlement' contained in Appendix F to the 2017 SA Report identifies mitigation measures to be considered should the option be taken forward as a preferred option. In consequence, the assertion that the SA Report does not accord with the SEA Regulations and NPPG is incorrect. No change.

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		Scoping Considers that the SA Scoping Report (2015) provides a comprehensive framework for the SA and is compliant with the regulations with regard to: the identifications of plans, policies and programmes; baseline information and identification of sustainability issues; SA Framework and proposed methodology and use of significance criteria as specified in the regulations, including the secondary, cumulative and synergistic effects.	Comment noted. No change.
		States that the SA Framework fails to consider the proportion of sites that may be affected by a constraint. For example, flood risk receives a double negative effect if any of the site is in an area of risk. The matrix therefore runs the risk of misrepresenting the results.	Disagree. The Site Appraisal Criteria do not distinguish between the area of a site that may be affected by a given constraint because the methodology has been designed to enable the identification of potentially significant effects on a worst-case basis in order to ensure that the assessment is sufficiently rigorous. The SA Framework including the Site Appraisal Criteria were subject to full consultation at the scoping stage and revised as a result of the responses received. In consequence, it is not considered appropriate to amend the SA Framework or criteria at this stage. No change.
		Issues and Options Sustainability Appraisal The respondent states: "*At Issues and Options Stage CCC considered three spatial options. As part of this process, CCC states that it had considered but discounted a 'Large New Settlement' because a large settlement was not considered suitable, justified or reasonable. Two options for a new settlement were considered, one of which was Hammonds Farm with the other at Bull's Lodge Quarry Farm. However, the alternative of a Large New Settlement was not assessed against the SA Framework and its performance against other alternatives was not compared. Furthermore, this option was not consulted upon. The justification for the decision not to pursue this is not evident. The SA should inform the council's decision, not the other way round.*" This issue is further discussed in the SA Appendix, which states: *"The Council's decision should be informed by the SA, not the other way around, as set out in the NPPG (017 SEA/SA). The SA has therefore failed to comply with the regulations and guidance."*	Disagree. As noted in the response, a range of alternatives for the Spatial Strategy were considered in the Issues and Options Consultation Document SA Report (October 2015) (the 2015 SA Report). Consideration was explicitly given to the alternative of a large new settlement (with the two candidate locations of Hammonds Farm and Bull's Lodge Quarry Farm) considered. However, at that stage, for the reasons set out in paragraphs 1.4.21 – 1.4.27 of the 2015 SA Report, the alternative was not considered reasonable, suitable or justified. Following further consideration by the Council including a review of the Issues and Options Consultation responses and the Local Plan evidence base, a further reasonable spatial strategy alternative was identified – Urban Focus with Growth at Hammonds Farm and Key Service Settlements. This was identified by the Council after the consideration of the Issues and Options responses and subsequently tested in the Preferred Options SA Report. The reasons the alternative spatial strategy was selected are set out below.

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			• The option to include Hammonds Farm was not considered as a 'non-starter' as it is being actively promoted for development and could provide for the quantum of new development required in the new Local Plan, • The option to include Hammonds Farm broadly satisfies the distribution of development in the proposed Spatial Strategy, for example by locating development in East Chelmsford (despite its being severed from Chelmsford Urban Area) • The option to include Hammonds Farm could potentially deliver benefits including significant supporting infrastructure alongside new housing and employment growth in line with the Strategic Priorities • The site is within a single land ownership and being actively promoted for development (based on the submitted site promoter proposals and information provided to Officers) • Although major road infrastructure upgrades would likely be required to implement the development, there is some uncertainty regarding what road infrastructure/upgrades would be required and how achievable these would be including widening of the A12. • The representations to the Issues and Options consultation in which there was some support for a proposed new settlement at this location from some stakeholders and members of the public (however, it is important to note that there was also support for the rejection of this proposal in the consultation responses). To inform the development of the Preferred Options Consultation Document, an alternative spatial strategy including a new settlement at Hammonds Farm, 'Urban Focus with Growth at Hammonds Farm and Key Service Settlements', was therefore appraised and the findings presented in the 2017 SA Report that accompanied the Preferred Option Consultation Document (see Appendix F and Section 5). Hammonds Farm was also assessed at this stage as a possible site allocation (CFS 83 'Land West of the A12 and East of Sandford Mill Road') (see Appendix G). The iterative nature of local plan preparation is such that new reasonable alternatives may be identified throughout the plan development process. Provided these reasonable alternatives are subject to SA, this should not result in a local planning authority having to return to earlier stages of the plan making process. In this content, whilst a Spatial Strategy option

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			including Hammonds Farm was not assessed at the Issues and Options stage, it was subsequently reconsidered by the Council and subject to SA at the Preferred Options stage (which itself is not a statutory stage in the local plan process). In this way, the SA helped to inform the Council's decision to take forward the preferred Spatial Strategy. In this context, the findings of the SA, alongside the evidence base, other assessments and consultation, have informed the Council's selection and refinement of preferred options for the Local Plan, as detailed in Section 5.3 of the 2017 SA Report. The SA has played an integral role in shaping and influencing the Local Plan throughout its preparation. The SA has assisted with the identification of sustainable options, taking into account the likely social, environmental and economic effects of implementing different Spatial Strategies, site allocations and policies, and reasonable alternatives. The SA process has also helped to illustrate how policies and objectives could be made more sustainable and has identified issues relating to specific locations or policies early and throughout the planning process for these to be considered and addressed. In consequence, the SA has fully considered reasonable alternatives, the appraisal of which has informed the preferred approach set out in the Pre-Submission Local Plan. No change.
		Preferred Options Sustainability Appraisal Notes that the three options tested at Issues and Options stage became a hybrid option - the Council's preferred option at this stage. The new hybrid option included a large proportion of the Bulls Lodge Quarry Farm site, which was previously discounted. States that the inclusion of this area of land raises fundamental issues with regard to deliverability, which have not been addressed in the SA. It is not known why Bulls Lodge Quarry has been retained in the option.	Disagree. As noted above, a range of alternatives for the Spatial Strategy were considered in the Issues and Options Consultation Document SA Report (October 2015) (the 2015 SA Report). Consideration was explicitly given to the alternative of a large new settlement (with the two candidate locations of Hammonds Farm and Bull's Lodge Quarry Farm) considered. However, at that stage, for the reasons set out in paragraphs 1.4.21 – 1.4.27 of the 2015 SA Report, the alternative was not considered reasonable, suitable or justified. Following further consideration by the Council including a review of the Issues and Options Consultation responses and the Local Plan evidence base, land around Bulls Lodge Quarry was proposed for inclusion within Strategic Growth Site 4 – NE Chelmsford. This was identified by the

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			Council and subsequently tested in the Pre-Submission SA Report. The reasons for its selection are set out below. • The option to include land around Bulls Lodge Quarry was not considered as a 'non-starter' as it is being actively promoted for development as part of development in North East Chelmsford that could help to deliver a sustainable new garden community in this location. • The option accords with the distribution of development in the proposed Spatial Strategy, for example by directing development in North Chelmsford and to sustainable urban extensions around Chelmsford in line with the Settlement Hierarchy. • The option to include land around Bulls Lodge Quarry could benefit from significant supporting infrastructure being delivered as part of the existing Channels and Beaulieu Park developments, as well as deliver new and improved infrastructure such as the Chelmsford North East Bypass alongside new housing and employment growth in line with the Strategic Priorities. • Representations in which there was some support for more growth in North East Chelmsford to maximise benefits arising from the proposed Chelmsford North East bypass and new railway station. Reflecting the iterative nature of the plan preparation process, land at Bulls Lodge Quarry Farm was therefore reconsidered and appraised as part of the proposed North East Chelmsford site allocation. No Change.
		The Response to Pre-Submission Document states "*As a result of the consultation on the Issues and Options local plan, which elicited considerable support for a large new settlement option at Hammonds Farm, CCC introduced a new spatial option - Urban Focus with Growth at Hammonds Farm and Key Service Settlements, the 'Alternative Spatial Strategy'. However, the Preferred Option had been selected by the council prior to consultation. Given the fact that the two options perform very similarly, it was premature to select the Preferred Option prior to consultation. The Preferred Options SA report states that the appraisal of Hammonds Farm has demonstrated that the type and range of effects across the SA objectives are likely to be similar to those identified in respect of the preferred Spatial Strategy' (paragraph 5.3.59).*"	Disagree. As set out above, to inform the development of the Preferred Options Consultation Document, an alternative spatial strategy including a new settlement at Hammonds Farm, 'Urban Focus with Growth at Hammonds Farm and Key Service Settlements', was appraised and the findings presented in the 2017 SA Report that accompanied the Preferred Options Consultation Document (see Appendix F and Section 5). Section 5.3.59 of the 2017 SA Report states *"…there is considered to be greater uncertainty with regard to the deliverability of this alternative (related to the transportation infrastructure requirements necessary to bring forward a new settlement at Hammonds Farm and to ensure connectivity with the Chelmsford Urban Area) and, relative to the preferred Spatial Strategy, the potential for significant landscape effects is considered*

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		In addition, the SA Appendix disagrees with the 2017 SA Report where it states: *"5.3.102 The Council has had regard to the main issues raised in the responses to the Issues and Options Consultation Document. These are summarised in a feedback report published in June 2016. Although this revealed significant support for a potential new settlement of up to 5,000 new homes at Hammonds Farm, there was also support for discounting a large new settlement.* *5.3.103 Overall, although this site is available, it is considered to perform less well compared with Location 4 when assessed against the SA objectives (see Appendix G), the preferred Spatial Strategy and the Local Plan evidence base."* The respondent considers that the results of the SA and the evidence base available do not support the decision taken.	*to be greater. Further, as this option would involve the creation of a new settlement that is detached from the existing urban area, accessibility to key services, facilities and employment opportunities would be reduced*." It concludes in paragraph 5.3.60 that "*Overall, when compared to the preferred Spatial Strategy, the findings of the SA indicate that this alternative spatial strategy performs less well in terms of its sustainability*." Hammonds Farm was also assessed at this stage as a possible site allocation (CFS 83 'Land West of the A12 and East of Sandford Mill Road') (see Appendix G). The iterative nature of local plan preparation is such that new reasonable alternatives may be identified throughout the plan development process. This should not result in a local planning authority having to return to earlier stages of the plan making process. In this content, it is not considered that the selection of the preferred Spatial Strategy option in the Preferred Options Consultation Document was premature; this decision was based on the findings of the SA, other assessments, consultation and the evidence base (as detailed in Section 5.3 of the 2017 SA Report). In any case, Hammonds Farm was identified in the Preferred Options Consultation Document as an 'alternative considered' such that consultees had an opportunity to comment on this option. No change.
		The respondent states that, in the absence of appropriate supporting information, it appears that the SA has been prepared on the basis of pre-determined decisions made by the Council, rather than the SA informing the decision. States that the SA Report should clearly identify the significant positive and negative effects of each alternative and provide conclusions on the sustainability of each alternative (NPPG SEA/SA 018). The respondent considers that the SA has not demonstrated that the Council's chosen approach is the most appropriate strategy given the reasonable alternatives considered because it has not assessed the alternative spatial strategy to the same level of detail. States that the	Disagree. The significant effects of the Council's preferred options and all reasonable alternatives have been identified and appraised in accordance with the approach detailed in Section 4 of the 2017 and 2018 SA Reports; the findings of this appraisal are summarised in Section 5 of the respective reports. This appraisal has been informed by the baseline information presented in Section 3 and the Council's evidence base as well factual (baseline) information provided by developers. The reasons for the selection of the preferred Spatial Strategy option are clearly set out in paras 5.3.56 to 5.3.73 of the 2017 SA Report (and at paras 5.3.40 to 5.3.57 of the 2018 SA Report). The reasons for the rejection of the alternative Spatial Strategy options considered in

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		assessment has taken a 'mitigation off' approach to the selection of options. Given the similarity in the spatial strategy assessment results, the respondent considers that it is not clear why the preferred approach was selected. States that the SA has only considered mitigation measures in respect of the preferred options and that it cannot, therefore, accurately show how the different options perform. Considers that mitigation measures should have been considered in the assessment of alternatives. The SA Appendix goes on to add that the Council decided that the sustainability benefits of the preferred option were significantly better to justify its selection, prior to consultation and without consideration of mitigation measures for the alternative option, contrary to the regulations and guidance. (Reg 12 (3) Sch 2 (7); NPPF Para 152; NPPG SEA/SA 013; 17).	preparing the Local Plan including 'Urban Focus with Growth at Hammonds Farm and Key Service Settlements' are set out in paras 5.3.74 to 5.3.103 of the 2017 SA Report and in Appendix F to the 2018 SA Report. Para 17 of the NPPG on SEA/SA identifies the need to consider ways of mitigating adverse effects. Schedule 2 of the SEA Regulations, also referred to, requires an Environmental Report (in this case an SA Report) to identify the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme. In accordance with the SEA Regulations, measures have been identified to mitigate adverse effects and enhance positive effects associated with the emerging Local Plan throughout the SA process, as summarised in Section 5.7 of the SA Report. With specific regard to Hammonds Farm, the appraisal of the spatial option 'Urban Focus with Growth at Hammonds Farm and Key Service Settlement' contained in Appendix F to the 2017 SA Report identifies mitigation measures to be considered should the option be taken forward as a preferred option. As noted above, all options have been assessed equally within the SA. No change.
		States that the assessment of the alternative spatial strategies has failed to take into account the cumulative effects of the different options, which could have a significant bearing on the decision-making process and is contrary to the SEA Regulations.	Disagree. The cumulative effects of the Local Plan are assessed in Section 5.6 of the 2017 and 2018 SA Reports and in accordance with Schedule 2 of the SEA Regulations. Schedule 2 of the SEA Regulations requires the consideration of cumulative, secondary and synergistic effects as part of consideration of likely significant effects; however, it is not explicit that this requirement applies to reasonable alternatives and in consequence, it is considered that such an appraisal is not necessary. Indeed, the hypothetical cumulative effects of various alternative options in combination would be too numerous to be reasonably assessed. Notwithstanding this, in assessing the effects of each alternative Spatial Strategy option, the SA has sought to include the consideration of cumulative effects as far as is possible.

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			No change.
		States that the assessment of Hammonds Farm has not taken into account information submitted to the Council and therefore misrepresents the likely effects of the alternative spatial strategy, particularly in respect of landscape, flood risk and transport. Considers that the results of the SA are therefore inaccurate. States that when mitigation measures are applied the SA shows that Hammonds Farm performs better than the preferred option.	Comment noted. For the avoidance of doubt, the mitigation measures that the respondent is referring to are the development proposals for Hammonds Farm, which the respondent would like included within the assessment as they contend that this would lead to a more favourable appraisal of Hammonds Farm. It would be inappropriate to accept mitigation proposed by a developer as site submissions received by the Council during the preparation of the Local Plan are accompanied by proposals of differing level of detail and commitment. In addition, there are no certainties that proposals made in regard to mitigation at the site allocation stage will become fact, prior to consideration through the planning application process. To ensure all sites are considered in the same manner, mitigation proposals are therefore excluded from the site appraisal and SHLAA process. However, where factual (baseline) information has been provided by developers, this has informed the SA. No change.
		The SA Appendix identifies the representations made by Terence O'Rourke at the Preferred Options stage, stating: "4.17 *Instead, the approach taken in the SA has been to select the preferred approach for the spatial strategy and site allocations and then apply mitigation to the preferred strategy through the application of the Local Plan policies and site requirements. By failing to consider the potential mitigation of each of the alternatives in the assessment (e.g. flood risk), the results cannot be relied upon and risk being a misrepresentation of the facts. It is not known how the other options will perform with the addition of mitigation measures. The SA report has failed to show that the potential adverse impacts identified for Hammonds Farm cannot be mitigated.*"	Disagree. The response to Terence O'Rourke's comments made at the Preferred Options stage can be found in Appendix B of the 2018 SA Report. As set out above, the appraisal of the Spatial Strategy option 'Urban Focus with Growth at Hammonds Farm and Key Service Settlement' contained in Appendix F to the 2017 SA Report identifies mitigation measures to be considered should the option be taken forward as a preferred option. For the avoidance of doubt, all of the proposed site allocations and reasonable alternatives including Hammonds Farm have been appraised against the SA objectives that comprise the SA Framework using tailored appraisal criteria and associated thresholds of significance, as per the approach set out in Section 4.3 of the 2018 SA Report. In all instances, the methodology has been applied consistently to all sites and has not taken into account the mitigation that could be provided by the draft

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			Local Plan policies. In this regard, para 4.3.11 of the 2018 SA Report states "*It should be noted that the site appraisal does not take into account the provisions of the associated site allocation policies contained in Chapter 7 of the Pre-Submission Local Plan nor the mitigation provided by the other proposed Local Plan policies contained in the document. This is to ensure that all sites are considered equally.*" Chapter 7 of the Pre-Submission Local Plan includes policies that are area/site specific and which have been appraised separately (see Appendix I of the 2018 SA Report). Those policies that relate to specific site allocations have been assessed by taking forward the findings of the site appraisal (Appendix G) and applying the associated development requirements (as set out in the related policies). This has enabled consideration of the extent to which the policies of Chapter 7 may help to mitigate adverse effects and enhance positive effects associated with the delivery of the proposed site allocations and, subsequently, the identification of where there would be residual significant effects. It is important to recognise that the appraisal presented in Appendix I is of the proposed policies as opposed to a further (re)appraisal of site allocations. The appraisal of these policies has not informed the Council's selection of the proposed site allocations nor have the policies been taken into account in the site appraisal (Appendix G); instead the appraisal is intended to help refine the provisions of the policies. In this context, as Hammonds Farm has not been taken forward by the Council as a proposed site allocation and does not therefore have an associated policy, it is not included within the matrices in Appendix I. No change.
		Considers that the results of the responses to the consultation process are not explained within the SA Report nor how they have been taken into account in the revisions to the Local Plan and SA. Highlights that the SA states: "*The Council has had regard to the main issues raised in the responses to the Issues and Options Consultation Document. These are summarised in a feedback report published in June 2016. Although this revealed significant support for a potential new settlement of up to 5,000 new homes at Hammonds Farm, there was also*	Disagree. Appendix B to the 2018 SA Report contains a schedule of the consultation responses received to the SA Reports, indicating how (where appropriate) they have been taken into account in the SA process. As noted above, the findings of the SA, alongside the evidence base, other assessments and consultation, have informed the Council's selection and refinement of preferred options for the Local Plan, as detailed in Section 5.3 of the 2017 and 2018 SA Reports.

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		support for discounting a large new settlement. Overall, although this site is available, it is considered to perform less well compared with Location 4 when assessed against the SA objectives (see Appendix G), the preferred Spatial Strategy and the Local Plan evidence base" and considers that the statement is not correct as the results of the SA and the evidence base available do not support the decision taken.	No change.
		Pre-Submission Sustainability Appraisal The respondent identifies a list of what are considered to be the failings of the 2018 SA Report, as follows: *1.* Failure to show how the findings of consultation undertaken have been considered or influenced the plan's development or the SA. The appendix states: "*The SA report fails to include a summary of the consultation responses, particularly from the statutory consultees (Historic England, Natural England, The Environment Agency, Highways England and the neighbouring authorities).* *The Preferred Options Consultation Feedback report (January 2018) reveals that the majority of respondents (168 out of 238) are opposed to the Preferred Spatial Strategy, yet this is not mentioned within the SA. The SA report has not shown how the consultations have been taken into account in decision-making in accordance with the regulations and guidance (EU Directive 2001/42/EC Article 8).*" The SA Appendix states that the SA has made comments against the representations submitted by Terence O'Rourke in Appendix B, but these raise additional issues. In response to the perceived different approach taken between the competing sites and the lack of consideration of the Council's evidence, the respondent notes that SA Report states: *"Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation."* The respondent considers that the response implies that the evidence	Disagree. Appendix B to the 2018 SA Report contains a schedule of the consultation responses received to the SA Reports, indicating how (where appropriate) they have been taken into account in the SA process. Consultation responses have been received from, amongst others: the Environment Agency, Historic England, Natural England, Highways England, Essex County Council and Rochford District Council. The 2018 SA Report references how consultation responses have been taken into account in the development of the plan, and the selection of options (e.g. paragraphs 5.3.53 and paragraphs 5.3.56). In accordance with the SEA regulation 16, at adoption of the Local Plan, a Post Adoption Statement will be prepared that sets out how consultation responses have been taken into account. For clarity, the comment provided by Terence O'Rourke was summarised as: "*Considers it extremely disappointing that the scenarios which included Hammonds Farm that were tested through the Chelmsford Strategic Model appear to provide a limited level of the supporting highway infrastructure identified by Hammonds Estates (HEst). It is also considered that the draft Local Plan fails to recognise the substantial sustainability benefits that could be achieved by locating new growth in locations which are close to areas of economic activity and existing or planned transport infrastructure, such as; the City Centre and stations, the Sandon Park and Ride, the A414 corridor, the A12 corridor; and Beaulieu Park Railway Station. This would maximise the use of existing infrastructure and maximise the value of the investment that Chelmsford has already secured.*" The comment is not on the SA and as such a cross reference was provided to where the respondent could find an appropriate response. Notwithstanding this, the SA has been informed by the baseline information presented in Section 3 and the Council's evidence base as well factual (baseline) information provided by developers.

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		base has not been used to inform the SA, contrary to the regulations and guidance and that it appears that the SA is testing pre-determined decisions made by the Council rather than testing options and the underpinning evidence to inform the Local Plan and the decision-making process.	The Local Plan itsellf has been developed alongside a comprehensive process of SA and HRA. This has allowed sustainability issues to be identified and iteratively addressed through each stage of the plan-making process by the Council. At key stages of plan preparation, changes have been made to address the SA process (see Appendix J of Pre-Submission SA). The SA has informed the selection of plan options by appraising reasonable alternatives in respect of, in particular, different volumes of growth, spatial distributions and site allocations whilst at the same time helping to make the decision-making process more transparent. The SA process has not been used to test pre-determined decisions made by the Council. No change.
		2. Discrepancies in the accuracy of evidence raised at the Preferred Options stage have not been addressed in the Pre-submission SA.	Disagree. The SA has been informed by the most recent and up-to-date information. In this context, over 100 international/European, national, regional/sub-regional and local level plans and programmes have been reviewed and the baseline presented in Section 3 of the 2018 SA Report covering 11 topics was updated to ensure that the information continues to provide an up-to-date evidence base for the SA. It would be inappropriate to accept mitigation proposed by a developer as site submissions received by the Council during the preparation of the Local Plan are accompanied by proposals of differing level of detail and commitment. In addition, there are no certainties that proposals made in regard to mitigation at the site allocation stage will become fact, prior to consideration through the planning application process. To ensure all sites are considered in the same manner, mitigation proposals are therefore excluded from the site appraisal and SHLAA process. However, where factual (baseline) information has been provided by developers, this has informed the SA. No change.

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		3. Failure to demonstrate that the SA has been used to test the evidence underpinning the Local Plan. The SA appendix states: "*The above statement from Amec demonstrates that an integrated approach to the development of the Local Plan has not been followed. The issues between the Local Plan and SA are intrinsically linked and should inform each other. The evidence should be tested through the SA to identify if the plan will achieve sustainable development. The SA results should then be used to inform the development of the plan*."	Comment noted. The NPPG (SA/SEA para 001) states "*It [SA] can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met*". As noted above, the SA has been informed by the most recent and up-to-date baseline information including the Local Plan evidence base. In this context, the baseline presented in Section 3 of the 2018 SA Report was updated to ensure that the information continues to provide an up-to-date evidence base for the SA. In this context, it is considered that the evidence base has been considered when undertaking the SA. We would concur that the SA should be undertaken iteratively alongside and informing the development of the Local Plan. For example, a number of measures were identified in the 2017 SA Report that accompanied the Preferred Options Consultation Document concerning recommended changes to the proposed Local Plan policies and the site-specific development requirements. Appendix J to the 2018 SA Report lists the recommendations together with the Council's response. No change.
		4. Selection of the preferred option was made prior to consultation on the two alternative spatial strategies.	Comment noted. This matter primarily relates to the Local Plan as opposed to the SA. A range of alternatives for the Spatial Strategy were considered in the Issues and Options Consultation Document SA Report (October 2015) (the 2015 SA Report). Consideration was explicitly given to the alternative of a large new settlement (with the two candidate locations of Hammonds Farm and Bull's Lodge Quarry Farm) considered. However, at that stage, for the reasons set out in paragraphs 1.4.21 – 1.4.27 of the 2015 SA Report, the alternative was not considered reasonable, suitable or justified. Taking into account representations received to the Issues and Options Consultation Document and the accompanying 2015 SA Report, the Council determined that Hammonds Farm should be considered as a reasonable alternative. To inform the development of the Preferred Options Consultation Document, an alternative spatial strategy including a new settlement at Hammonds Farm, 'Urban Focus with Growth at Hammonds Farm and Key Service Settlements', was therefore appraised

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			and the findings presented in the 2017 SA Report that accompanied the Preferred Option Consultation Document (see Appendix F and Section 5). Hammonds Farm was also assessed at this stage as a possible site allocation (CFS 83 'Land West of the A12 and East of Sandford Mill Road') (see Appendix G). The iterative nature of local plan preparation is such that new reasonable alternatives may be identified throughout the plan development process. Provided these reasonable alternatives are subject to SA, this should not result in a local planning authority having to return to earlier stages of the plan making process. Whilst a Spatial Strategy option including Hammonds Farm was not assessed at the Issues and Options stage, it was subsequently subject to SA at the Preferred Options stage (which itself is not a statutory stage in the local plan process), as part of the iterative plan making process. In this way, the SA helped to inform the Council's decision to take forward the preferred Spatial Strategy. No change.
		5. Failure to consider information provided by the site promoter.	Disagree. Developer supplied information was reviewed in preparing the SA of the Pre-Submission Local Plan and the SA updated where necessary. The mitigation measures that the respondent is referring to are the development proposals for Hammonds Farm, which the respondent would like included within the assessment as they contend that this would lead to a more favourable appraisal of Hammonds Farm. It would be inappropriate to accept mitigation proposed by a developer as site submissions received by the Council during the preparation of the Local Plan are accompanied by proposals of differing level of detail and commitment. In addition, there are no certainties that proposals made in regard to mitigation at the site allocation stage will become fact, prior to consideration through the planning application process. To ensure all sites are considered in the same manner, mitigation proposals are therefore excluded from the site appraisal and SHLAA process. However, where factual (baseline) information has been provided by developers, this has informed the SA. No change.

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		6. Cumulative impacts of the alternative spatial strategy have not been considered.	Disagree. The cumulative effects of the Local Plan are assessed in Section 5.6 of the 2017 and 2018 SA Reports and in accordance with Schedule 2 of the SEA Regulations. Schedule 2 of the SEA Regulations requires the consideration of cumulative, secondary and synergistic effects as part of consideration of likely significant effects; however, it is not explicit that this requirement applies to reasonable alternatives and in consequence, it is considered that such an appraisal is not necessary. Indeed, the hypothetical cumulative effects of various alternative options in combination would be too numerous to be reasonably assessed. Notwithstanding this, in assessing the effects of each alternative Spatial Strategy option, the SA has sought to include the consideration of cumulative effects as far as is possible. No change.
		7. Failure to assess the alternative spatial strategy in the same level of detail or to consider mitigation measures of the alternative option.	Disagree. As set out above, the SA has appraised all reasonable alternatives in the same manner, and to the same depth, at both the strategic and site level. In this context, the proposed Hammonds Farm site referred to in this response has been appraised as both an alternative Spatial Strategy option and as an individual site allocation option. The alternative Spatial Strategy options identified for appraisal during the SA process are described in Section 5.3 of the Pre-Submission Local Plan SA Report (January 2018) (the 2018 SA Report) with the reasons for their rejection set out in Appendix F; the options appraised include 'Urban Focus with Growth at Hammonds Farm and Key Service Settlements' which included the proposed Hammonds Farm site. The findings of the appraisal of this option are contained in Appendix F to the Preferred Options Consultation Document SA Report (March 2017) (the 2017 SA Report). The respondent states that the "*alternative spatial strategies received very similar scores before mitigation was applied and the reasons for the selection of the Preferred Strategy are not supported by the evidence. A proper comparison of the results cannot be made and the SA is therefore not compliant with the regulations or guidance*." This is incorrect. The

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			approach to assessing the Spatial Strategy options (including the preferred option and reasonable alternatives) identified by the Council has been consistent and has followed the methodology detailed in Section 4.3 of the 2018 SA Report. To confirm, the appraisal of these options, including the preferred Spatial Strategy option, has not taken into account the mitigation provided by the draft Local Plan policies in order to ensure that all options are treated equally. Paras 5.3.59 of the 2017 SA Report state "*…there is considered to be greater uncertainty with regard to the deliverability of this alternative … and, relative to the preferred Spatial Strategy, the potential for significant landscape effects is considered to be greater. Further, as this option would involve the creation of a new settlement that is detached from the existing urban area, accessibility to key services, facilities and employment opportunities would be reduced.*" Para 5.3.60 concludes "*Overall, when compared to the preferred Spatial Strategy, the findings of the SA indicate that this alternative spatial strategy performs less well in terms of its sustainability.*" Hammonds Farm has also been appraised as a site allocation (CFS 83 'Land West of the A12 and East of Sandford Mill Road'). The full appraisal of this site and the other reasonable alternatives identified by the Council can be found in Appendix G of the 2018 SA Report together with the reasons for the selection of the proposed site allocations and for the rejection of alternatives. All of the proposed site allocations and reasonable alternatives including Hammonds Farm have been appraised against the SA objectives that comprise the SA Framework using tailored appraisal criteria and associated thresholds of significance, as per the approach set out in Section 4.3 of the 2018 SA Report. In all instances, the methodology has been applied consistently to all sites and has not taken into account the mitigation that could be provided by the draft Local Plan policies. In this regard, para 4.3.11 of the 2018 SA Report states "*It should be noted that the site appraisal does not take into account the provisions of the associated site allocation policies contained in Chapter 7 of the Pre-Submission Local Plan nor the mitigation provided by the other proposed Local Plan policies contained in the document. This is to ensure that all sites are considered equally.*"

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			Chapter 7 of the Pre-Submission Local Plan includes policies that are area/site specific and which have been appraised separately to the site allocations (see Appendix I of the 2018 SA Report). Those policies that relate to specific site allocations have been assessed by taking forward the findings of the site appraisal (Appendix G) and applying the associated development requirements (as set out in the related policies). This has enabled consideration of the extent to which the *policies* of Chapter 7 may help to mitigate adverse effects and enhance positive effects associated with the delivery of the proposed site allocations and, subsequently, the identification of where there would be residual significant effects. It is important to recognise that the appraisal presented in Appendix I is of the proposed Chapter 7 policies as opposed to a further (re)appraisal of site allocations. The appraisal of these policies has not informed the Council's selection of the proposed site allocations nor have the policies been taken into account in the site appraisal (Appendix G). In this context, as Hammonds Farm has not been taken forward by the Council as a site allocation and does not therefore have an associated policy, it is not included within the matrices in Appendix I. No change.
		8. Failure to demonstrate that the SA has informed the development of the local plan.	Disagree. As set out in Section 1.4 of the 2018 SA Report, SA has been undertaken during the key stages of the plan preparation process with the findings presented in a series of interim SA Reports. Initially, the SA considered options concerning the amount and broad location of growth identified in the Issues and Options Consultation Document. These options were assessed and the findings presented in the 2015 SA Report that was issued for consultation alongside that document. The Council's preferred options including proposed site allocations and further reasonable alternatives were then subject to SA with the findings presented in the 2017 SA Report that was published alongside the Preferred Options Consultation Document. The 2018 SA Report considers the effects of the Pre-Submission Local Plan. In this context, the findings of the SA, alongside the evidence base, other assessments and consultation, have informed the Council's selection and

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			refinement of preferred options for the Local Plan, as detailed in Section 5.3 of the 2018 SA Report. Additionally, through the SA process, measures have been identified concerning recommended changes to the proposed Local Plan policies. Appendix J to the 2018 SA Report lists these recommendations together with the Council's response. The appraisal of the Pre-Submission Local Plan has identified further measures to help address potential negative effects and enhance positive effects associated with the implementation of the Local Plan. These measures are highlighted within the detailed appraisal matrices contained at Appendices F, H and I and will be considered by the Council in preparing the final Local Plan. In accordance with the SEA Regulations, the Post Adoption Statement will include details relating to how the SA has informed the Local Plan. Overall, it considered that the SA has fully informed the development of the Local Plan. No change.
		Paragraphs 5.6 to 5.19 of the SA Appendix make the same points again with regards to assessing the developer proposals (referred to as mitigation) and using the SA to test the evidence base, noting that at Preferred Options stage Terence O'Rourke raised a number of concerns with regards to the evidence base. In particular, the viability and deliverability of the North East Chelmsford Bypass, the accuracy of the Landscape Sensitivity and Capacity Assessment and the proposed mitigation measures to address flood risk.	With regards to incorporating the development proposals, please refer to the response on 'Equal Treatment of Reasonable Alternatives' above. As noted above, the NPPG (SA/SEA para 001) states "*It [SA] can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met*". As noted above, the SA has been informed by the most recent and up-to-date baseline information including the Local Plan evidence base. In this context, the baseline presented in Section 3 of the 2018 SA Report was updated to ensure that the information continues to provide an up-to-date evidence base for the SA. In this context, it is considered that the evidence base have been considered when undertaking the SA. No change.

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PS SA1	Mr Stephen Parker	Objects to the proposals affecting Writtle on grounds of traffic congestion, loss of habitat for local wildlife, parking and the merging of Writtle into westlands and the City Centre. States that traffic is almost at a standstill at the moment and another 2,000 houses will bring the City to a stop.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. No change.
PS SA2	Mr Derek Cooley	Raises concern with regard to the dividing of the town (Writtle Parish); states that it is better to develop between the A414 and current village.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. No change.
PS SA3	Mrs F L Emmett	States that South Woodham Ferrers is positioned in the bottom of the Crouch Valle and that frequent tidal surges can cause serious flooding, protected only by man-made sea walls. Considers that any further large scale development, on land north of the B1012 would exacerbate an already serious local flood risk problem that exists today.	Comment noted. Effects in respect of flood risk have been identified and assessed within the SA on a site-by-site basis based on the latest flood risk mapping provided by the Environment Agency (see Appendix G). In this regard, North of South Woodham Ferrers has been assessed as having a significant negative effect on flood risk. However, the SA Report highlights (at Appendix I) that the associated site allocation policy requires the use of flood mitigation measures which should help minimise flood risk. No change.
PS SA4	Mr Michael Benning	States that the SA Report includes policies which are purely speculative and based upon the supposition that proposals would improve the infrastructure to cope with the increase.	Comment noted. The draft Local Plan policies seek to ensure that appropriate infrastructure is provided in support of new development and which has been reflected in the SA. No change.
PS SA5	Mrs Linda Morgan	States that infrastructure is not capable of accommodating the kind of development proposed especially when taken into account Tabrums Farm. Raised concern for lack of a crossing from the town centre to health facilities, lack of public transport, flood risk and lack of school funding.	Comment noted. The SA has noted the potential adverse effect on infrastructure associated with strategic-scale development in this area, primarily adverse highway impacts and as result of additional congestion.

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			The SA has also identified a broad range of services and facilities in close proximity to Location 7: North of South Woodham Ferrers. Policy SGS 7, meanwhile, includes requirements for additional infrastructure, including a potential new primary school, health centre and improvements to transport infrastructure including public transport. This is expected to help mitigate any adverse effects associated with this site. No change.
PS SA6	Mrs Linda Morgan	States that infrastructure does not exist for any development in South Woodham Ferrers of the size proposed. Highlights that there is overwhelming support for no further development in the town or surrounding area.	Comment noted. The SA has identified a broad range of services and facilities in close proximity to Location 7: North of South Woodham Ferrers. Policy SGS 7 also includes a requirement for additional infrastructure, including a new primary school, health centre and improvements to transport infrastructure including public transport. The SA has noted the potential adverse effect on infrastructure associated with strategic-scale development in this area, primarily adverse highway impacts and as result of additional congestion. Reference should also be made to the Chelmsford Infrastructure Delivery Plan (January 2018) for further details. No change.
PS SA7	Dr Reza Hossain	Highlights that the Council states that it wishes to reduce greenhouse gas emissions and congestion but this will be very difficult in the centre of Chelmsford. States that Perth imposed very high car parking charges in the centre of Perth. People who resided in the centre of Perth didn't have to pay the charge, but anyone coming to work or shop or visit had very high car parking charges. Would like to encourage to try to use a Perth model of transportation to really reduce congestion, and increase public transport and cycling/walking.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. No change.
PS SA8	Mr William Adshead-Grant (Great Waltham Parish Council)	Identifies that measures to provide sustainable non-car transportation are assumed in the Local Plan to reduce the road infrastructure needed for the planned developments in the growth areas. The adequacy of the road infrastructure as planned will depend on achieving these reductions.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan.

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			No change.
PS SA9	Mr Keith Francis	Feels that the Local Plan will fail to satisfy an overall Sustainability Appraisal test that is vital for the future of the plan area and the regional context in which it is situated.	Comment noted. The SA Report, which has been prepared in accordance with the SEA regulations, concludes (Section 6.1) that: "*the majority of the SA objectives will experience positive effects as a result of the implementation of the policies and proposals contained in the Pre-Submission Local Plan. Whilst negative effects have also been identified against many of the SA objectives, particularly associated with proposed site allocations, the Pre-Submission Local Plan includes policies which seek to manage these effects such that significant adverse effects will be largely avoided. Reasonable alternatives, in terms of development requirements, the Spatial Strategy and site allocations, have been considered as part of the SA of the Pre-Submission Local Plan and earlier plan development stages. The appraisal of these alternatives has demonstrated that, overall, the proposals of the Pre-Submission Local Plan perform similar to, or better than, the alternatives considered when assessed against the SA objectives*." No change.
PS SA 10	Mrs Carol McMaster	Suggests that development in South Woodham Ferrers will have a negative effect on biodiversity. States that the proposed site allocation will not integrate sustainably and raises concern for parking provision, GP/healthcare provision, lack of public transport, regeneration and flooding.	Comment noted. With regard to North of South Woodham Ferrers, the SA (at Appendix G) has identified the potential for a significant adverse effect on biodiversity based on the site's proximity to sites designated for nature conservation; however, the associated draft Local Plan policy (Policy SGS7) includes a specific requirement relating to the mitigation of potential impacts on biodiversity, including landscape buffers to the development edges and Local Wildlife sites. The policy also requires the provision of and/or financial contributions towards, recreation disturbance avoidance and mitigation measures for European designated sites including the Crouch Estuary. These measures are expected to minimise the risk of significant negative effect on biodiversity. The SA has demonstrated that the site benefits from good accessibility to public transport and key services and facilities. Further, Policy SGS 7 identifies additional infrastructure to be provided on site including a new

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			primary school, health centre and improvements to transport infrastructure including public transport. No change.
PS SA 11	Mr Matthew Winslow, Basildon Borough Council	No comment.	Noted.
PS SA12	Mr Steve Rogers, Castle Point Council	No comment.	Noted.
PS SA13	Mrs Mary Dove	With regard to Site 6: Broomfield, states that traffic will increase as a result of people travelling to Broomfield School and the station. Considers that Hammonds Farm is a better alternative as infrastructure (the A12) is already in place and that it is preferential to have a "big build" in one place rather than causing congestion in Chelmsford where there is no infrastructure and no space for improvement.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. The findings of the SA indicate that there is considered to be greater uncertainty with regard to the deliverability of the Hammonds Farm alternative (related to the transportation infrastructure requirements necessary to bring forward a new settlement at Hammonds Farm and to ensure connectivity with the Chelmsford Urban Area) but does highlight that a new settlement would present an opportunity to deliver a new sustainable neighbourhood which could help to offset adverse effects in this regard and deliver some sustainability benefits (such as reduce traffic in the Chelmsford Urban Area). Overall, when compared to the preferred Spatial Strategy, the findings of the SA indicate that this alternative spatial strategy performs less well in terms of its sustainability. The specific reasons for the selection of Broomfield and for the rejection of Hammonds Farm are set out in Appendix G of the SA Report. This includes capacity issues on the A12 No change.

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PS SA14	Mr Peter Wyatt	With regard to North of South Woodham Ferrers, states that the Local Plan is not sustainable. Considers that there is no guarantee of any significant infrastructure to support the number of houses that are proposed. Highlights that the new development will be separated from the town of South Woodham Ferrers and that the road will need to be crossed by children attending the school. States that there is a lack of public transport with no improvements and that fluvial flooding and sewerage leakage in parts of the town have not been investigated.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. With regard to North of South Woodham Ferrers, the SA Report (at Appendix G) has demonstrated that the site benefits from good accessibility to public transport and key services and facilities. Further, Policy SGS 7 identifies additional infrastructure to be provided on site including a potential new primary school, health centre and improvements to transport infrastructure including public transport. With regard to flood risk, the site has been assessed as having a significant negative effect. However, the SA Report highlights (at Appendix I) that the associated site allocation policy requires the use of flood mitigation measures which should help minimise flood risk. No change.
PS SA15	Mr Paul Grundy	See response of the North West Parishes Group.	Comment noted. See responses to **PS SA45 – PS SA49**.
PS SA16	Dr Simon Heffer	Identifies that development at Moulsham Hall is separated from Great Leighs Village. States that there will be effects on the environment, ecology and heritage and impact on landscape, economy, ancient parkland and wildlife habitat. Considers that the site is detached from a local village, and removed from established amenities and that traffic congestion on by-pass will be an issue. States that Hammonds Farm should be developed as an alternative.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. The anticipated effects of development at Moulsham Hall have been assessed within the SA (see Appendix G) and adverse impacts have been identified, including in respect of biodiversity, landscape, transport and heritage. The findings of the SA indicate that there is considered to be greater uncertainty with regard to the deliverability of the Hammonds Farm alternative (related to the transportation infrastructure requirements necessary to bring forward a new settlement at Hammonds Farm and to ensure connectivity with the Chelmsford Urban Area). The specific

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			reasons for the selection of Moulsham Hall and for the rejection of Hammonds Farm are set out in Appendix G of the SA Report. No change.
PS SA17	Ms Angela Thompson	States that greenfield land lost to development should be of Grade 4 and 5 agricultural land quality and not Grade 2.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. No change.
PS SA18	Mrs Gillian Ketland	States that development of North of South Woodham Ferrers would result in urban sprawl and divide the community. Considers that proposed infrastructure does not meet or support the need of the Local Plan and highlights that there are no proposed improvements to existing rail service. Does not consider that the impact of the proposals on the environment and quality of life of residents has been taken into account.	Disagree. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. The SA has, however, appraised the social, economic and environmental effects of the Pre-Submission Local Plan in accordance with the approach set out in Section 4 of the SA Report. This has included an assessment of the proposed development of North of South Woodham Ferrers (see, for example, Section 5.4 and Appendix G of the SA Report). With regards to infrastructure, reference should be made to the Chelmsford Infrastructure Delivery Plan (January 2018) for further details. No change.
PS SA19	Mr Daniel Goodman, Rochford District Council	No comment.	Noted.
PS SA20	Tayler Wimpey Strategic Land	Considers that the Spatial Strategy underestimates the Local Plan's housing needs and the ability of the draft Plan's allocated brownfield sites to meet that need over the plan period. States that the plan does	Disagree. National planning policy is clear that Green Belts should be protected. The protection of the Green Belt from inappropriate development is an important national and local principle. The Local Plan

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		not therefore recognise that there are exceptional circumstances which require the amendment of Green Belt boundaries to accommodate the Local Plan's housing needs - including the allocation of a sustainable urban extension to the south of the Chelmsford at land to the south of Galleywood Road would help meet that need. States that Table NT3 'housing spatial strategy' does not, therefore have a significant positive affect on SA Objective 2 (housing) and should be amended to a significant negative effect. Also considers that the Spatial Strategy is not justified as the Council has failed to adequately consider alternatives to the preferred strategy and that the plan is not positively prepared because it fails to adequately assess both housing need and infrastructure needs to implement its strategy.	evidence base supports the principle that Chelmsford's strategic housing and employment development needs can be clearly accommodated without encroaching into the Green Belt. Therefore, no areas of search within the Green Belt are being put forward by the Council as Spatial Options in the new Local Plan. As set out in Section 5.3 of the SA Report, "*The provision of 21,893 dwellings over the plan period would meet and exceed the City Area's objectively assessed housing need of 805 net new homes per-year, as identified in the Objectively Assessed Housing Needs (OAHN) Study (2016). This housing requirement includes an uplift from the demographic start to cover projections for future jobs, past delivery and market signals together with close to a further 20% supply capacity, all of which equates to a total requirement of 952 dwellings per annum. The development requirements are in accordance with the recommendations of the OAHN Study, which states that an uplift is needed to respond to issues related to the past provision of homes and to address 'market signals,' including London-related migration needs. The development requirements are also expected to help provide a degree of flexibility by ensuring choice and competition in the market by increasing the supply of housing land, which is consistent with the NPPF's direction that local planning authorities should seek to boost significantly the supply of housing (see para 47) and the broad aim of the Housing White Paper (2017).*" In this context, the findings of the SA in terms of the significant positive effects of the Spatial Strategy on housing are considered to be appropriate. The comment relating to the soundness of the Local Plan principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. No change.
PS SA21	Tayler Wimpey Strategic Land	Repeats **PS SA20** above. Additionally highlights that national policy sets out that there is no need to include land in the Green Belt which is unnecessary to keep permanently open and that, where necessary, local planning authorities should identify in their plans areas of safeguarded land between the urban area and the Green Belt.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan.

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			No change.
PS SA22	Tayler Wimpey Strategic Land	Repeats **PS SA21**.	Please see responses to **PS SA20** and **PS SA21**.
PS SA23	Tayler Wimpey Strategic Land	Repeats **PS SA21**.	Please see responses to **PS SA20** and **PS SA21**.
PS SA24	Tayler Wimpey Strategic Land	Repeats **PS SA21**.	Please see responses to **PS SA20** and **PS SA21**.
PS SA26	Mr Peter Marriage	States that the housing allocation (North of Broomfield) has been cut but the boundary of the village envelope has not been reduced accordingly. Considers that this should be reduced from the west to the line shown for the new hospital approach road to avoid damage to the very important landscape / Pleshey Plateau to the west.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. No change.
PS SA27	Ms N Pippen	With regard to West Chelmsford, does not consider that the effects on traffic volume and the assumption that residents will follow transport plans not personal cars are realistic. Also raises concern about the lack of secondary school plans in Writtle.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. No change.
PS SA28	Mrs Sarah Clark	Notes that the SA under the 2004 Act has been designed to incorporate the full requirements of European Directive 2001/42/EC on the 'assessment of the effects of certain plans and programmes on the environment' and in particular to provide a summary of assessment against objectives, covering alternatives and secondary/cumulative effects.	Disagree. The SEA Directive and transposing regulations require the assessment of 'reasonable alternatives'. The NPPF requires that local plans include strategic policies to deliver (inter alia) the homes and jobs needed in the area. In this context, to be considered 'sound' the NPPF sets out (at para 182) that local plans "*should be prepared based on a strategy which seeks to meet objectively assessed development and*

Ref	Consultee	Consultee Response Summary	Response/Action
		States that there has been no Local Plan provision option that is alternative to pro-growth and the SA is therefore not legally compliant.	*infrastructure requirements*". In consequence, an alternative 'no growth' option is not considered to be a reasonable alternative and has therefore not be subject to appraisal as part of the SA process. No change
PS SA29	Mrs Sarah Clark	States that the Local Plan plan is contrary to NPPF para 14. Considers that the B1008 cannot accommodate the population growth and the SA Report uses inaccurate population data to make predictions of road capacity which invalids Broomfield as an option.	Disagree. The population data cited in Section 3.4 of the January 2018 SA Report was the latest data available from the Office for National Statistics at the time of publication. The SA has also been informed by traffic modelling prepared in support of the Local Plan. With regards to road infrastructure capacity, reference should be made to the Chelmsford Infrastructure Delivery Plan (January 2018) for further details. No change.
PS SA30	Mrs Karen Hawkes, South Woodham Ferrers Town Council	States that the entry for Strategic Growth Site 7 in Appendix G under PF36 should be re-worded.	Comment noted. No reasoning has been given for a change of wording, so no change will be made.
PS SA32	Mr John Whitlock	Identifies that the SA Report (at 5.3.13) refers to the earlier SA iteration at the Issues and Options stage, and whilst the then housing targets of Option 2 – 775 dwelling per annum and Option 3 – 930 dwellings per annum can be expected to offer the greatest benefits in terms of housing delivery and economic growth, the lower two option (Options 1 – 657 dwelling per annum and Option 2 – 775 per annum) are preferable in terms of lower negative effects across a number of environmental SA objectives.	Comment noted. No change.
PS SA33	Mr Michael Petty	States that the development of the Warren Farm site will generate pollution, noise and traffic congestion issues.	Comment noted. Effects on air quality, noise and congestion associated with this allocation have been considered in the site appraisal contained in Appendix G of the SA Report. In this regard, a significant negative effect has been identified in respect of transport; however, the Pre-Submission Local Plan requires measures to enable travel by sustainable modes and improvements to the local and strategic road network which are expected to help mitigate these effects.

Ref	Consultee	Consultee Response Summary	Response/Action
			No change.
PS SA34	Sarah Grimes, Burnham-on-Crouch Town Council	States that the rail section of the SA Report does not cover the finite sustainable capacity of CVL Railway.	Comment noted. The SA has considered the accessibility of the rail network in appraising proposed site allocations, in accordance with the SA Framework and site appraisal criteria set out in Section 4 and Appendix G of the SA Report. For further details of forthcoming rail upgrades, reference should be made to the Chelmsford Infrastructure Delivery Plan (January 2018). No change.
PS SA35	Miss Jessica Davis	Raises concern with regard to traffic impacts along Roxwell Road and whether new services will be provided, when services are currently being cut.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. With regards to road infrastructure capacity, reference should be made to the Chelmsford Infrastructure Delivery Plan (January 2018) for further details. No change.
PS SA36	Mrs Teresa Gibson	Agrees with the proposed cycling route from City Centre to Great Waltham. However, raises concern about the traffic impact on Main Road and states that the proposed 450 dwellings in Broomfield should not be increased.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. With regards to road infrastructure capacity, reference should be made to the Chelmsford Infrastructure Delivery Plan (January 2018) for further details. No change.

Ref	Consultee	Consultee Response Summary	Response/Action
PS SA37	Mr Phil Bamford, Gladman Developments Ltd	States that the Council should ensure that the results of the SA process clearly justify its policy choices. 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.	Agreed. The SA has been undertaken iteratively alongside and informing the development of the Local Plan. The reasons for the selection of the preferred options and for the rejection of alternatives are set out in Section 5.3 of the SA Report.
PS SA38	Mr Richard Kelly, Croudace Homes	States that the Local Plan is not legally compliant because an adequate SA has not been prepared to assess the proposed Spatial Strategy against the other "reasonable alternatives". Notes that the SA Report confirms at page B79 that the land to the north and east of Rettendon Place (i.e. site reference 15SLAA40) "has not been subject to assessment as part of the SA process" and that as "Spatial Strategy Options 2 and 3 have not been progressed, this site would not be consistent with the Preferred Spatial Strategy, and, therefore, is not considered to be a reasonable alternative for the purposes of the SA." States that this approach is flawed as the Council has selected its preferred Spatial Strategy first and then discounted sites (without assessment in the SA) for not complying with that strategy. Considers that the SA's reasoning that the land at Rettendon Place is not a "reasonable alternative" is wrong and highlights that this site was included in two of the three Spatial Options at the Issues & Options stage and that the land to the north and east of Rettendon Place must therefore be a realistic option considered by the plan-maker (and therefore a reasonable alternative), otherwise why was it included in two of the three Spatial Options at the Issues & Options stage.	Comment noted. The decision to progress Spatial Strategy Option 1 reflects the objective to focus development within the top two tiers of the settlement hierarchy. Site 15SLAA40 has not been subject to assessment as part of the SA process. As Spatial Strategy Options 2 and 3 have not been progressed, this site would not be consistent with the Preferred Spatial Strategy and, therefore, is not considered to be a reasonable alternative for the purposes of the SA. No change.
PS SA39	Stonebound Properties Ltd	Requests that promoted site (CFS154) Land to the South of Brooklands should be considered as a reasonable alternative in the SA.	Agreed. CFS154 has been assessed as a reasonable alternative. Please refer to Section 3.4 of the SA Addendum.
PS SA40	Tritton Family Trust	Considers that site SGS5A Great Leighs - Land at Moulsham Hall fails to conform with the priorities, vision, principles and strategy stated, citing landscape and accessibility concerns. With regards to G40 - Great Leighs - 17SLAA21, 17SLAA22, 17SLAA23, 17SLAA24, 17SLAA26, considers the rationale made for rejection of these sites to be significantly flawed. States that they are in close proximity to the existing village centre of Great Leighs, are on the eastern side of the by-pass and comply better with the Spatial Principles and Spatial Strategy. Also states that these	Comment noted. This response principally relates to the Local Plan and supporting evidence base as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. The reasons for the selection and rejection of these sites in set out in Appendix G of the SA Report.

Ref	Consultee	Consultee Response Summary	Response/Action
		sites are better located from a landscape perspective. States that no assessment appears to have been made of the supporting information on ecology, landscaping and transport matters submitted as part of the development of these sites. No consideration has been given to the fact that these sites plan for an extension along the principles of a Garden village i.e. with a new primary school, neighbourhood facilities and new spine road to Boreham Road and the village.	Developer supplied information was reviewed in preparing the SA of the Pre-Submission Local Plan and the SA updated where necessary. All of the proposed site allocations and reasonable alternatives have been appraised against the SA objectives that comprise the SA Framework using tailored appraisal criteria and associated thresholds of significance, as per the approach set out in Section 4.3 of the 2018 SA Report. In all instances, the methodology has been applied consistently to all sites. It would be inappropriate to accept mitigation proposed by a developer as site submissions received by the Council during the preparation of the Local Plan are accompanied by proposals of differing level of detail and commitment. In addition, there are no certainties that proposals made in regard to mitigation at the site allocation stage will become fact, prior to consideration through the planning application process. To ensure all sites are considered in the same manner, mitigation proposals are therefore excluded from the site appraisal and SHLAA process. However, where factual (baseline) information has been provided by developers, this has informed the SA. No change.
PS SA41	Mr Edward Baldock	Is astonished that the Local Plan fails to consider the effects of the increasing use of electrically powered vehicles and driverless vehicles.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. No change.
PS SA42	Mrs Mary Rance	States that site CFS81 (17SLAA32) is partly a brownfield site and its location, in close proximity to Boreham, does not constitute isolated development in the countryside. States that it is perfectly feasible to walk or cycle into the village from the site along a very short stretch of road which mainly encompasses the bridge over the A12 trunk road and that the site is as close as many of the other residential properties within the village to the services of the village and public transport. Considers that for the Specialist Residential Accommodation use, the site location is absolutely appropriate, it will make best use of a brownfield site and will provide a sustainable form of development meeting a dire, identified	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. The SA identified the potential for a minor negative effects on the local landscape, noting that the site is partially brownfield and that there is the potential for development to be in keeping with the local landscape. Access is also scored as a minor negative, noting the site's close

Ref	Consultee	Consultee Response Summary	Response/Action
		need.	proximity to a bus stop and that whilst Waltham Lane is a narrow road, there is the potential for limited scale development. No change.
PS SA43	Seven Capital Plc	States that in light of the transitional arrangements and the timescale for submission of the Local Plan for examination, the emerging Local Plan should be employing the Government's standard methodology for housing targets/requirements across the plan period, with any departure fully insisted, in accordance with Paragraph 61 of the draft NPPF. States that this hasn't been considered as part of the SA. Also states that the Council has failed to consider all reasonable alternatives for the delivery of housing as the housing requirement for Eastwood House Car Park should be stated as a minimum.	The approach used to calculate the OAN is a matter for the Local Plan. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the Submission Local Plan. All sites within the SA are assessed on the basis of an estimated capacity. In the case of Eastwood House (Car Park) Glebe Road, the site has been assessed as having capacity for 100 dwellings, scoring a significant positive against SA Objective 2. If the wording were amended to reflect a minimum housing level, this would not materially affect the performance of the site for the purposes of the SA as a significant positive effect has already been identified. No change.
PS SA44	Katie Parsons, Historic England	Identifies that Historic England has published guidance which may be helpful. States that the SA objectives and guide questions that comprise the SA Framework are generally appropriate and welcome particularly SA Objectives 13 and 14. States that the key sustainability issues relating SA Objective 13 outlined on page 65 of the SA Report are appropriate and reasonable.	Comments noted.
PS SA45	Lynn Ballard, North West Parishes Group	Notes that the SA identifies that greenfield land will be required to accommodate strategic growth sites and that this will have an overall negative impact on the land/landscape/townscape. States that this is particularly relevant to the proposed extension of West Chelmsford (SGS2). Also notes that a negative effect on waste and resources has been identified due to the location of the site being within a Minerals Safeguarding Area. Considers that there are significant impacts on landscape and environment as a result of the proposed development, which will also	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. No change.

Ref	Consultee	Consultee Response Summary	Response/Action
		have significant challenges in terms of infrastructure delivery and sustainable travel. States that there are not adequate mitigation measures secured in the planning policy to address these considerations and as such, if the Plan had been justified in giving adequate consideration to alternative sites for development, the relative impacts of this site would have been suitably considered. Contents that it is therefore the case that alternative sites, where these are located close to existing infrastructure and in locations better able to accommodate additional growth in a sustainable manner, would be more suitable for this growth than the extension to the West of Chelmsford.	
PS SA46	Lynn Ballard, North West Parishes Group	Has concerns relating to the loss of higher grade agricultural land over Green Belt land, Green Wedges and Green Corridors and states that the Council should have undertaken a Green Belt review. Considers that without mitigation, the impact of the proposed growth could place pressure on key services and facilities. Notes that effects identified in the SA are deemed to be minimised through the characteristics of individual sites and also the delivery of development in/adjacent to urban areas and Key Service Settlements, which have greater capacity in terms of their sustainability to receive growth. Considers that there is inconsistency in the definition of these Key Service Settlements; although they are treated similarly in terms of the amount of development they should or could accommodate, the settlements themselves considerably vary in terms of the existing scale and facilities, therefore the increase in growth is not of the same or comparable impact. Also raises concerns regarding adverse effects on the environment and whether these can be mitigated as implied by the SA. Questions whether the level of housing is right and the extent to which this will need to be altered again in the context of a change in the means of calculation of housing figures.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. No change.
PS SA47	Lynn Ballard, North West Parishes Group	Raises concern with regard to development of North East Chelmsford (SGS4) in terms of the scale and nature of development and the delivery challenges of this, the sustainability impacts of the development (as the site is located within a Minerals Safeguarding Area) and impact on	Disagree. The appraisal of this site presented in Appendix G to the SA Report has identified a range of potential effects associated with this proposed site allocation.

Ref	Consultee	Consultee Response Summary	Response/Action
		cultural heritage. States that there are considerable impacts as a result of this proposed development, which are not reflected in the Local Plan. States that significant risks in terms of the delivery of this site and the associated required infrastructure are not fully reflected in this SA.	The Council is confident that the allocated site can be delivered at an appropriate point within the plan period having regard to the likely planning impacts. Policy SGS 4, meanwhile, includes requirements for appropriate re-phasing of minerals extraction and restoration and Minerals Resource Assessment and measures to mitigate the impact of the development. No change.
PS SA48	Lynn Ballard, North West Parishes Group	Suggests that development at Hammonds Farm (and other sites) could be in addition to that at North East Chelmsford (rather than instead of) to spread the burden of growth. States that Hammonds Farm is close to the proposed train station and this fact has not been adequately reflected in terms of sustainability. Also highlights that the evidence provided by the promoters of this site deems the A12 to have capacity to accommodate development. Objects to the rejection of the Hammonds Farm site, particularly in light of the consultation responses received in support of its development.	Disagree. The proximity of the Hammonds Farm site to existing and proposed infrastructure was considered in the appraisal of the associated spatial strategy option (see Appendix F of the 2017 SA Report). At Appendix F of the 2018 SA Report it states: *"A large development at Hammonds Farm would also be expected to significantly increase the use of the city centre rail station, which is already close to capacity, more so than the site in NE Chelmsford which will be in close proximity to the proposed station at Beaulieu Park and will be connected into the walking and cycling routes serving the new NE Chelmsford neighbourhood."* The reasons for rejection of Hammonds Farm are set out in Appendix F and Appendix G of the SA Report. This includes greater uncertainty with regard to the deliverability of the Hammonds Farm alternative (related to, inter alia, the transportation infrastructure requirements necessary to bring forward a new settlement at Hammonds Farm and to ensure connectivity with the Chelmsford Urban Area). No change.
PS SA49	Lynn Ballard, North West Parishes Group	Opposes the reasons for Hammonds Farm being rejected as a site allocation. States that the site should be reconsidered as a sustainable location for growth which would reflect the wider aspirations of the Local Plan.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. No change.

Ref	Consultee	Consultee Response Summary	Response/Action
PS SA50	Eastern Approach Investments Ltd	Requests that site CFS137 should be assessed as a reasonable alternative for employment within the SA.	Disagree. CFS137 is not considered a reasonable alternative as the developable area is within the Green Belt. No change.
PS SA51	North West Chelmsford Community Group	States that the data the GTAA 2016 is based upon fails to demonstrate up to date cross-authority target setting. Contends that the data and the report cannot be fully relied upon.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. No change.
PS SA52	North West Chelmsford Community Group	Repeats **PS SA51**.	Please see responses to **PS SA51**.
PS SA53	Bellway Homes	Considers that the rationale for the selection of Growth Site 5a is unsupported and inaccurate. Considers that this site does not conform or align well with the Strategic Priorities, Vision, Spatial Principles and Spatial Strategy, that is divorced from the settlement and that development will require additional vehicle/pedestrian connections. Disagrees with the findings of the SA which considers that there are no overriding physical constraints to bringing forward the allocation in this location. States that the site is divorced from the settlement, severed by the A131 and that delivering a new housing development in this location will require the creation of a number of pedestrian, cycle and vehicular connections across the A131 into the village to encourage community cohesion.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. The Council is, however, confident that the allocated site can be delivered at an appropriate point within the plan period having regard to the likely planning impacts. Policy SGS 5a, meanwhile, recognises that good connections exist between the site and the existing village of Great Leighs e.g. via a pedestrian/cycle footbridge and underpass and that these should be utilised and improved by the new development. No change.
PS SA54	Bellway Homes	Contests the conclusion to reject CFS120. States that CFS120 is situated immediately adjacent the Great Leighs settlement boundary, within walking distance from two bus routes, village services such as the shop, post office and playing fields and immediately adjacent to the primary school. Considers that site CFS120 is better located than the preferred sites within Great Leighs.	Comment noted. This response principally relates to the Local Plan and supporting evidence base as opposed to the SA. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan.

Ref	Consultee	Consultee Response Summary	Response/Action
		Notes that the SA considers Site CFS120 to be adjacent to areas considered to be of high landscape sensitivity, when compared to sites 5b and 5c. States that the conclusion makes no reference to Site 5a. Referring to the Council's Landscape Sensitivity and Capacity Assessment – Additional Site Assessments (November 2017) Figure 3.2 it is apparent that Site 5a, a preferred location for development in the Local Plan, lies immediately adjacent a landscape of high sensitivity. In addition to this Site 5a appears to encompass parcels of high landscape sensitivity, where site CFS120 does not. Considers that it is therefore unclear how the Council reached its conclusion without recognising the possible landscape impact of Site 5a.	The Council considers, however, that overall the site performs less well than the preferred site against the Spatial Strategy and Spatial Principles, for example it is less well connected to the strategic road network and closer to the SSSI. More information is set out within Appendix G of the Pre-Submission SA Report. No change.
PS SA55	North West Chelmsford Community Group	States that it is not apparent within the SA that it has been updated to take account of the fact that the Gravel Pit bus stop is no longer present and there is no bus service.	Disagree. Appendix G of the SA Report identifies a minor negative effect for GT1 Drakes Lane against SA Objective 6, which is correct in the absence of the Gravel Pit bus stop. No change.
PS SA56	North West Chelmsford Community Group	Notes that the SA Report demonstrates that site GT1 will create a number of minor negative effects and significant negative effects. Queries whether the sustainable living and revitalisation, health and well-being and transport scoring of the site will fall further in the complete absence of public transport following the closure of the Gravel Pit bus stop and service is taken into account.	Disagree. Appendix G of the SA Report identifies a minor negative for GT1 Drakes Lane against SA Objective 6, which is correct in the absence of the Gravel Pit bus stop. No change.
PS SA57	North West Chelmsford Community Group	Repeats **PS SA56**.	Please see responses to **PS SA56**.
PS SA58	Cliffords Ltd	Requests that site CFS212/Land at Saxon Way be appraised.	Comment noted. This site has been assessed as a reasonable alternative. The name given to the site in the assessment is 'Land adjacent to Campion Farm, Saxon Way, Broomfield'. The assessment is set out in Appendix G, page G18 of the SA Report**.** No change.

Ref	Consultee	Consultee Response Summary	Response/Action
PS SA59	Cliffords Ltd	Requests that Site CFS125 should be assessed as a reasonable alternative for employment as it is considered a sustainable location for development.	Agreed. CFS 125 has been assessed as a reasonable alternative. Please refer to Section 3.3 of the SA Addendum.
PS SA60	Jessica Dawson, Great and Little Leighs Parish Council	With regard to Land East of Banters Lane (15SLAA16), the respondent notes the findings of the assessment. With regard to site 155LAA28 (Land East of 52 Main Road), notes that the assessment states that the nearest supermarket is 327m away which is considered to be incorrect. Considers that the local store noted cannot be classed as a supermarket. Also highlights that the nearest primary school is full. With regard to site CFS105 (Land East of Nos 170 – 194 Main Road), agrees that this site is within 100m of two Nature Reserves and actually butts onto these in at least two places. Considers that light, noise and air pollution will impact on these sites. With regard site PF33/34 (Moulsham Hall and Great North Leighs), the respondent notes the assessment findings. Considers that the findings of the SA indicate that the sites East of Main Road and North East of Banters Lane will have a negative effect on Great Leighs with light, noise and traffic pollution, lack of open space, pressure on health services and schools and changing the very local distinctiveness of Great Leighs which the Council states is high on its agenda but is not borne out by this Local Plan.	Comments noted. With regard to the appraisal of site 15SLAA28, supermarkets are taken to include local stores for the purposes of the SA. This will be clarified in the Pre-Submission SA/SEA Report. It should be noted that the Council does not propose to allocate sites 15SLAA17 and15SLAA28. No change.
PS SA61	Cogent Land	Relates to alternative site at Boreham (Land SE of Lion Inn). A Sustainable Development Scorecard Report has been produced to summarise the analysis and demonstrate that the proposals show a high level of agreement with the NPPF, aiding the case for the allocation of the site. This will contain additional background on the Scorecard methodology and assessment process to ensure the analysis is given due weight by Chelmsford City Council. Added as attachment.	Comment noted. Information set out in the sustainability scorecard has been given due consideration. No significant information was identified as such the appraisal remains unchanged.

Ref	Consultee	Consultee Response Summary	Response/Action
PS SA62	The North East Chelmsford Garden Village Consortium	The Consortium has no substantive comments on the SA Report and recognises that the iterative nature of the SA process has been undertaken in accordance with best practice. With regard to Strategic Growth Site 4 (North East Chelmsford), and the assessment set out at pages 597/598 of the SA Report, the Consortium notes the likely significant effects identified in the commentary, and in particular that SA Objectives 1 (Biodiversity), 2 (Housing), 3 (Economy), 4 (Sustainable Living and Revitalisation), 5 (Health and Wellbeing), 6 (Transport) and 11 (Climate Change) are now appraised as being positive or significant positive. States that this compares well with other major strategic allocations, and also in comparison to potential alternative strategic sites such as Hammonds Farm (CFS83). In particular, the Consortium notes, with regard to Hammonds Farm, that the rationale for its rejection states that "This site compares less well with Location 4 (NE Chelmsford) and the Spatial Principles and Spatial Strategy of the PSLP, in particular by not respecting the existing pattern of settlements or locating development in well-connected locations". The Consortium concurs with this assessment and considers that the SA has been undertaken on an objective basis. Furthermore, the Consortium considers that its continuing masterplanning work will be able to mitigate the potentially significant negative effects identified in the SA Report regarding Objectives 13 (Cultural Heritage) and 14 (Landscape and Townscape). The Consortium concurs with, and supports, the overall appraisal of Growth Area 2 – North Chelmsford, set out at paragraphs 5.4.12-5.4.19 of the SA Report, and the reasons for the selection of Strategic Growth Site 4 set out on page 461 of the Report	Comment noted.
PS SA63	Ms Kate Ginn, Natural England	States that Natural England broadly supports the methodology used in the SA and is generally supportive of the proposed indicators for monitoring purposes, acknowledging the positive amendments made in line with its previous consultation response dated.	Comment noted.
		Recommends that a further indicator is added to the monitoring framework. The following wording is suggested:	Agreed. This indicator has been included in the monitoring framework contained in the SA Report Addendum.

Ref	Consultee	Consultee Response Summary	Response/Action
		'Number of planning approvals leading to loss of 'best and most versatile' (BMV) agricultural land (i.e. that classified as Grades 1, 2 and 3a land within the Agricultural Land Classification (ALC) system).'	
		Advises that the Key Sustainability Issues for Biodiversity and Green Infrastructure should include the need to protect designated sites from increased recreational pressure.	Comment noted. The SA has now reached an advanced stage and as such, the amendment to the key sustainability issues proposed in this response is not considered to be appropriate and would not be expected to materially affect the outcome of the appraisal in any case. No change.
		Proposes an additional guide question and an amendment to an existing guide questions under the Biodiversity and Green Infrastructure SA objective.	Comment noted. The SA has now reached an advanced stage and as such, the amendments to guide questions that comprise the SA Framework as proposed in this response are not considered to be appropriate and would not be expected to materially affect the outcome of the appraisal. No change.

4. Schedule of Responses to the HRA Report

Ref	Consultee	Consultee Response Summary	Response/Action
PS HRA1	Mr Stephen Parker	Objects to proposals affecting Writtle on grounds of traffic congestion, loss of habitat for local wild life, parking and the merging of Writtle into westlands and the City Centre.	Comment noted. This response principally relates to the Local Plan as opposed to the HRA which considers effects on European designated nature conservation sites. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. No change.
PS HRA2	Mr and Mrs Moore	Raises concern that the A132 and B1012 that lead to and past South Woodham Ferrers will be become even more congested and will result in severe delays at peak travelling times. States that the additional housing will intensify the amount of traffic and the additional junctions, crossings, roundabouts are likely to slow transit times significantly.	Comment noted. This response principally relates to the Local Plan as opposed to the HRA which considers effects on European designated nature conservation sites. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. No change.
PS HRA3	Mr and Mrs Moore	States that the Southminster branch line is a single track railway service and there are no plans for improvement or expansion. Considers that the addition of 1000 homes must have a significant impact on South Woodham Ferrers station and the train capacity at peak travelling times. Also highlights that the surrounding streets are already affected by commuters wishing to avoid car park costs.	Comment noted. This response principally relates to the Local Plan as opposed to the HRA which considers effects on European designated nature conservation sites. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. No change.
PS HRA4	Mr and Mrs Moore	Raises concern with regard to the proposal to construct a travelling show people site for heavy goods vehicles within the new development for South Woodham Ferrers and question what benefit it will bring to the community.	Comment noted. This response principally relates to the Local Plan as opposed to the HRA which considers effects on European designated nature conservation sites. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. No change.

Ref	Consultee	Consultee Response Summary	Response/Action
PS HRA5	Mrs Mary Dove	With regard to Growth Site 6 – North of Broomfield and the associated relief road, states that when initial checks were done about six badger sets were found, one is very close to were the new road is proposed. Highlights that there are also fallow deer that wander across the fields, plus the bats in the trees, in the field there is a natural water hole which the wild life come to.	Comment noted. This response principally relates to the Local Plan as opposed to the HRA which considers effects on European designated nature conservation sites. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. No change.
PS HRA6	Basildon Borough Council	Noted that the Council, like Basildon Borough Council, has signed the Memorandum of Understanding for the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS).	Comment noted.
PS HRA7	Mr David Taylor	Refers to responses to consultation questions 3a and 3b.	Comment noted. This response principally relates to the Local Plan as opposed to the HRA which considers effects on European designated nature conservation sites. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. No change.
PS HRA8	Castle Point Council	Noted that both the Council and Castle Point Borough Council have signed the Memorandum of Understanding for the Essex Coast RAMS.	Comment noted.
PS HRA9	Rochford District Council	No comment.	Noted.
PS HRA11	Miss Jessica Davis	States that the area north of Roxwell Road is currently a green field area providing a landscape that reflects the village of Writtle and the Agriculture College it is home to. Considers that a housing development in this location would therefore create a 'blot' on the landscape and destroy the local habitat.	Comment noted. This response principally relates to the Local Plan as opposed to the HRA which considers effects on European designated nature conservation sites. The Council's response to the main issues raised in comments to the Pre-Submission Consultation Document will be included in a separate document which will accompany the submission of the Local Plan. No change.

Ref	Consultee	Consultee Response Summary	Response/Action
PS HRA12	The North East Chelmsford Garden Village Consortium	The Consortium has no comments to make on the HRA and notes that the assessment of Strategic Growth Site 4 concludes that there is a low risk of any significant effects on their own or 'in combination' effects (regional visitor pressure issues).	Noted.
PS HRA13	Natural England (NE)	Requested explicit reference to "*the RAMS*" (Recreational disturbance Avoidance and Mitigation Strategy) in the text of certain policies (notably S6, S11, NE1, SGS 3a, 3c, 3d, 7, 8 and 9).	Agreed. The relevant policies contained an explicit requirement for "*Contributions towards recreation disturbance avoidance and mitigation measures for European designated sites*" but did not use the specific term "Recreational disturbance Avoidance and Mitigation Strategy (RAMS)". This has been altered through the Additional Changes.
		Requested that Policy SGS7 include specific reference to the need for project-level HRA due to the proximity of this allocation to the Crouch and Roach Estuary SPA and Ramsar site.	Agreed. Reference to HRA in the policy provides useful signposting, although HRA would be required by law at the project-level regardless of any policy provisions in this regard.
		Raised concerns regarding treatment capacity at Great Leighs and South Woodham Ferrers and identified increased risks at South Woodham Ferrers due to the proximity of the European sites at this location. Requested policy amendment stating that "*new development post 2024 will not be given planning permission unless the required capacity is available at South Woodham Ferrers and Great Leighs waste water treatment works…*"	Comment noted. The HRA considered the risks associated with treatment capacity in some detail. The subsequent update of the Water Cycle Study indicates that there is no capacity issue at the South Woodham Ferrers Wastewater Treatment Works (WwTW) for the duration of the Local Plan. The uprating of Great Leighs WwTW could clearly be achieved using available technologies (and Anglian Water (AW) is required in any case to meet licence discharge standards) and so the Council can reasonably conclude that there will be no adverse effects via this mechanism. The requested amendment has not been incorporated directly into the Local Plan as it does not reflect the AW Asset Management Plan (AMP) process for funding treatment provision, and solutions other than the upgrade of these WwTWs may be preferred by the water company or regulator (the EA). However, the supporting text of Strategic Policy S12 has been amended to reflect this comment.

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		Suggested that the HRA under-emphasises the importance of those areas south and east of South Woodham Ferrers for brent geese, based on WeBS Core Count sector data. Also suggests that the HRA should not "*give weight to the argument that birds will habituate thereby reducing the likelihood of significant effects occurring*."	Comment noted. The HRA does not draw any conclusions regarding the relative importance of different areas of the estuary, nor suggest that the areas south and east of South Woodham Ferrers are less important than other areas of the estuary. Observations on the WeBS (etc.) data are made, although these do not underpin the 'no adverse effects' conclusion. Indeed, the HRA recognises that the data on bird distributions around the estuary do not allow for significant recreational pressure effects to be objectively excluded based on location alone (particularly as the effects are 'in combination' between various LPA allocations), hence the requirement for an overarching estuary-wide mitigation strategy. With regard to habituation, the HRA does not argue that potential effects of new development will be reduced by habituation; the observation within the HRA that some species are likely to be habituated to some types of existing disturbance is neutral and uncontroversial, and is not used as evidence in a 'no significant effects' argument for future development. These observations do not alter the conclusions of the HRA and no specific amendments or reassessments are proposed.
		Recommended the addition of "*Impacts to designated sites through changes in water resources will be avoided*."	Agreed. It is understood that this comment relates to local water levels and supply to designated sites rather than broader regional water resource provision, which is managed by the EA, AW, and Essex and Suffolk Water through the Water Resource Management Plan (WRMP) process, and so amendments are made in this context.
		Requested explicit reference to "*the RAMS*" in the text of Policy NE1.	Agreed. This has been altered through the Additional Changes, although it should be noted that (from an HRA perspective) Policy NE1 is simply a general protective policy and so not a 'source' for any effects that need to be mitigated; the inclusion of the same wording within the allocation policies effectively covers this aspect.

Ref	Consultee	Consultee Response Summary	Response/Action
		Noted that "*Mitigation identified through the RAMS needs to be in place prior to occupancy of new developments*", although this is not suggested as a required policy (etc.) amendment.	Comment noted. This aspect has been discussed with NE as a strictly linear mitigation delivery / occupancy process will not necessarily be deliverable / measurable due to the wide-ranging and strategic nature of the RAMS and the timescales over which management (etc.) projects may be brought forward; and the extent to which specific measures delivered by the RAMS can be attributed to specific developments. This aspect is more broadly covered in other policies and no specific Additional Changes are proposed in relation to this.

Issued by	Approved by
.....	.....
Alex Melling	**Pete Davis**

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Management systems

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