

# Chelmsford Local Plan Review: Pre-Submission (Regulation 19) Local Plan Consultation Document

## Integrated Impact Assessment Report – Feedback Report

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### 1. Introduction

#### 1.1 Chelmsford Local Plan Review: Pre-Submission (Regulation 19) Consultation Document

Chelmsford City Council (the Council) is carrying out a review of the Chelmsford Local Plan. Once adopted, the revised Local Plan will replace the Adopted Local Plan (Chelmsford Local Plan 2013-2036)<sup>1</sup>, setting out how much new development will be accommodated in the Council's administrative area (the 'City Area') to 2041, along with where this growth will be located. This Local Plan will also establish the policy framework for managing development proposals, containing planning policies which support the proposed vision: *"Guiding Chelmsford's growth towards a greener, fairer and more connected community."*

The Local Plan Pre-Submission (Regulation 19) Document<sup>2</sup> drew on the feedback received as part of the Preferred Options consultation and was consulted on between 4<sup>th</sup> February and 18<sup>th</sup> March 2025. This was the third and final stage of public consultation on the final draft Local Plan and was accompanied by the Integrated Impact Assessment (IIA) which is the subject of this report.

Prior to this stage, the feedback received as part of the Issues and Options Consultation was used to prepare the Preferred Options Consultation Document, accompanied by an IIA report<sup>3</sup>. Consultation on the documents took place between 8<sup>th</sup> May 2024 and 19<sup>th</sup> June 2024.

The first stage in the review of the Local Plan was the publication of the Chelmsford Local Plan Issues and Options Consultation Document (the 'Issues and Options Consultation Document')<sup>4</sup> that was consulted on between 11<sup>th</sup> August 2022 and 20<sup>th</sup> October 2022 and accompanied by an IIA report<sup>5</sup>.

The consultation responses made to the Pre-Submission IIA Report (2025) are set out in this report.

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<sup>1</sup> <https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-local-plan/adopted-local-plan/>

<sup>2</sup> [Pre Submission Consultation 2025](#)

<sup>3</sup> [preferred-options-integrated-impact-assessment.pdf](#)

<sup>4</sup> <https://www.chelmsford.gov.uk/media/chehlnlq/issues-and-options-consultation-document.pdf>

<sup>5</sup> <https://www.chelmsford.gov.uk/media/undd2l1y/chelmsford-local-plan-issues-and-options-iaa.pdf>

## 1.2 The Integrated Impact Assessment Report

The Council is required to carry out a Sustainability Appraisal (SA) of the Local Plan Review<sup>6</sup>. This is a means of ensuring that the likely social, economic and environmental effects of the Local Plan Review are identified, described and appraised and also incorporates a process set out under UK regulations<sup>7</sup> called Strategic Environmental Assessment (SEA). The SEA requires that environmental considerations are embedded into the development of plans and programmes such as local plans. The Local Plan IIA brings together SA and SEA, as well as Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA) within a single document. The HIA and EqIA are bespoke assessments designed to specifically address health and equalities matters in order to meet legislative requirements.

## 1.3 Habitats Regulations Assessment Report

The Conservation of Habitats and Species Regulations 2017 (as amended) requires local authorities to assess the potential impacts of land use plans on 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), which is also included within the IIA.

## 1.4 This Feedback Report

This report provides a record of the responses provided to the IIA Report and the HRA Report. Responses to the latter are presented at the end of Table 2.2. The responses will be taken into account by the Council in preparing the Local Plan, IIA and associated HRA for Submission for Examination.

## 1.5 Conclusion

Taking into account the comments made, only minor changes to the IIA may be necessary and could be considered in an Addendum to the IIA Report if required. The only recommendations for changes to the Local Plan relate to the HRA where minor changes to policy wording are suggested. These relate to references to 'other mitigation' beyond payment under RAMS and the need to adopt the approach progressed under future iterations of the Essex Coast RAMS SPD.

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## 2. Consultation Review

### 2.1 Responses

A total of 54 comments were made by 39 respondents on the Pre-Submission (Regulation 19) Consultation Document IIA Report. **Table 2.1** provides a breakdown of the type and number of respondents.

**Table 2.1 Type and Number of Respondents**

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<sup>6</sup> The requirement for SA of local plans is set out under section 19(5) of the Planning and Compulsory Purchase Act 2004.

<sup>7</sup> Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633).

Type of Respondent	Number of Respondents
Parish/Town Councils or adjoining Local Authorities	4
Developers or Representatives	25
Other Agencies and Authorities	4
Members of the Public	6

## 2.2 Schedule of Responses to the Integrated Impact Assessment Report

### Main Issues Raised

The main issues raised by respondents with regard to the IIA Report and the HRA Report are:

- Support for the IIA and its analysis.
- Objections to specific proposed strategic site allocations in respect of key sustainability criteria.
- Lack of justification for the proposed allocations, particularly in respect of the use of evidence.
- Specific site-related constraints which invalidate the choice of a specific site.
- Questioning the scoring by the IIA for specific indicators and how mitigation measures will be applied.
- The presence of alternative spatial options which are deemed more sustainable, consequently invalidating the choice of preferred allocations.
- Lack of a comprehensive Green Belt review undermining the IIA because a full range of alternative strategic options have not been presented.
- Concern that the protection of the Green Wedge is unnecessarily restrictive on new development meaning that all reasonable alternatives have not been fully assessed.
- Concern that the Housing Needs Assessment is outdated with consequent effects on the overall level of growth to be accommodated and associated spatial strategy.
- Lack of consideration of the availability and capacity of strategic and community infrastructure.
- Failure to present and appraise a sufficient range of reasonable alternatives, particularly higher growth options, leading to specific alternative sites and site options not being considered.
- Concern that the settlement hierarchy approach to the allocation of growth is overly restrictive, consequently preventing the testing of higher growth scenarios and ensuring that all reasonable alternatives are fully assessed.
- Correction of minor consistency errors in the presentation of results.

- The need to reconsider the application of the HRA to a wider range of sites in relation to recreational disturbance Zone of Influence established by the Essex Recreational disturbance and Mitigation Strategy (RAMS).
- No specific comments were made on either the HIA or the EqIA.

**Table 2.2** sets out a schedule of the responses received to the IIA Report and HRA Report and the response/ action to the points being made.

**Table 2.2 Consultation Response Summary**

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
<b>PSIIA-12</b>	Sempra Homes	Table 5.8	It is important to highlight an apparent error in the Pre-Submission Integrated Impact Assessment whereby the results in the summary Table 5.8 do not align with the results set out in the full assessment provided in Appendix G	Comments on inconsistencies in scoring are noted. Appendix G is correct and the summary scores presented in Table 5.8 will be updated.
			Subject to confirmation from the Council on which table provides the correct assessment of this site, our client considers the apparent assumption (through the negative air and water quality scores) that building more homes automatically results in an increase in population, to be unsound. There are no known air or water quality issues for this site for example, and as such the score appears to relate to the perceived increase of water usage and/or traffic movements. This would not necessarily be the case here, given that it is anticipated that the majority of the future residents of the Site, post-development, are residents already living in Chelmsford.	<p>The assessments are made in respect of specific aspects of the site option (air quality, water quality, and new infrastructure requirements) in light of available evidence, and the requirements of Development Management Policies which will implement mitigation in response to the detailed plans submitted by site proposers.</p> <p>The IIA considers housing and population increase across the Plan area and a working assumption is that resource use will increase, albeit with efficiencies, such as in water consumption. Furthermore, water supply forecasting is based on increased demand.</p> <p>The role of the IIA is to present an assessment of likely effects and where opportunities exist for their mitigation in light of proposed policies, and consequently enhancement of their overall sustainability performance and in respect of individual measures.</p> <p>No change to the IIA.</p>
<b>PSIIA-16</b>	Maldon District Council (MDC)	Para 4.3.27	It is also noted within the IIA there has been an identified impact on the road infrastructure around Maldon and in particular B1026 Goldhanger Road on the eastern side of Heybridge. The assessment states this is due to the potential increase in traffic volumes as a result of the Chelmsford City Local Plan. The assessment also comments that based on the Maldon District Local Development Plan significant increases in traffic on roads near the SAC are not anticipated. MDC are concerned about this impact, particularly as we are currently reviewing our own local plan. Whilst	Comments on likely traffic impacts are noted; these concerns are being considered by the Council's traffic consultants who will prepare a formal technical response.

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			no decisions have been made on our growth options, some scenarios include the potential for growth in larger villages, for example Heybridge.	
<b>PSIIA-17</b>	Maldon District Council (MDC)	Figures 3.7, 3.8, 3.9	It should be noted the tables on pages 89-91 included within the IIA, are unreadable within the document. (NB: refers to Printed Pages 77 to 79).	Comments on readability are noted and will be reviewed.
<b>PSIIA-15</b>	Maldon District Council (MDC)	Para 3.8.9	It is noted the IIA refers to the need to upgrade the Water Treatment Works at South Woodham Ferrers. Although no final decisions have been made regarding our preferred strategy at this stage, please note that a large site within the MDC district on the boundary with South Woodham Ferrers has come forward in the Call for Sites and may form part of MDC's strategic site allocations, subject to further assessment work.	Comments noted.  No change to the IIA.
<b>PSIIA-20</b>	A.G. & P.W.H Speakman	Para 6.4.14	<p><b>Settlement Hierarchy</b> The use of a settlement hierarchy to help inform the distribution of development within the administrative area is considered a logical approach, and a conventional one that has been successfully utilised in the preparation of a number of sound Local Plans prepared elsewhere in recent years. It can be a useful tool to ensure a sustainable distribution of development, although it is important that the application of the hierarchy to policies and allocation is not an overly simplistic one, and wider sustainability considerations are accounted for.</p> <p>We are supportive of the identification of Danbury as a Key Service Settlement.</p> <p>Whilst we agree that the use of a settlement hierarchy to help inform decisions regarding the scale of growth to be directed to the various settlements within the borough, as the policy text is currently worded, it is unclear how the settlement hierarchy as set out in Strategic Policy S7 is to be used by decision-makers.</p>	<p>Comments on re-wording of Strategic Policy 7 are noted. The Settlement Hierarchy is just one of several considerations for the Spatial Strategy, along with the Vision and Spatial Principles, and is considered to be a robust approach.</p> <p>Comments on the need to reconsider the Council's approach to Danbury's housing growth within the spatial strategy are noted.</p> <p>The Parish Council has selected the sites through a community-led approach, which is considered to be reasonable in relation to significant local constraints, and which resulted in the selection of the five chosen sites.</p> <p>Comments on exploring higher growth scenarios and additional allocations in sustainable settlements are noted.</p> <p>As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area.</p>

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>The proposed spatial strategy will focus new housing and employment growth to the most sustainable locations by making the best use of previously developed land in Chelmsford Urban Area; new garden communities to the northeast and east of Chelmsford; sustainable urban extensions around Chelmsford; expansion of existing employment sites; and development around Key Service and Service Settlements outside the Green Belt in accordance with the Settlement Hierarchy. Whilst the IIA confirms the strategy has been informed by all of the five proposed spatial options published at the Issues and Options stage, the spatial strategy is predominantly a continuation of the adopted Local Plan spatial strategy.</p> <p>To make the plan sound, the Council must reconsider its approach to Danbury's housing growth within the spatial strategy. The proposed growth target should be increased to reflect the higher strategic housing requirement and Danbury's sustainable status as a Key Service Settlement. This will ensure that Danbury's growth is not artificially constrained and that it makes an appropriate contribution to Chelmsford's housing supply over the extended plan period. The IIA must also be updated to test higher growth scenarios for Danbury, ensuring that all reasonable alternatives are fully assessed. Without this, the Local Plan risks being found unsound at examination and requiring significant modification.</p> <p>By exploring higher growth scenarios and additional allocations in sustainable settlements, the plan would better reflect Chelmsford's role within the wider Housing Market Area and its ability to contribute positively to unmet housing needs in neighbouring authorities. Testing spatial options that include additional allocations in Key Service Settlements would demonstrate a proactive and justified response to the housing pressures within the wider region and reinforce Chelmsford's position as a key contributor to the sub-regional housing market. Allocating sites such as Land at Anchor Field would also support the strategic objective of promoting sustainable development and ensuring that growth is directed to locations with the infrastructure and services to support it effectively.</p>	<p>Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that:</p> <ul style="list-style-type: none"> <li>- Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.</li> <li>- An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan, is not a "reasonable alternative".</li> <li>- The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process."</li> </ul> <p>A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA.</p> <p>No change to the IIA.</p>

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
<b>PSIIA- 24</b>	Hill Residential Ltd	Reasonable Alternatives (Section 6)	<p>3.1 The Draft Local Plan's spatial strategy is fundamentally flawed, primarily due to its overemphasis on protecting the Green Belt, which undermines the Plan's promotion of the most sustainable patterns of development within the district. As drafted the Draft Local Plan is not sound and does not meet its legal requirement to be prepared with the objective of contributing to the achievement of sustainable development.</p> <p>We say this because:</p> <ul style="list-style-type: none"> <li>• the Spatial Strategy at Policy S7 is not based on a review of all reasonable alternatives and is, therefore, not justified;</li> <li>• To be found sound, the Plan and its evidence base must assess the release of Green Belt land around Key Service Settlements as a spatial scenario. Completing this analysis will reveal the significant benefits of a more sustainable pattern of development. This will not only justify the need for Green Belt release around Key Service Settlements such as Writtle, but also demonstrate the presence of exceptional circumstances. The Sustainability Assessment (SA) process negates the need to assess and consider sustainable patterns of development that include potential Green Belt Land</li> </ul> <p>3.7 As a result, the SA is inadequate in terms of its assessments of the likely effects of the Plan's policies and its consideration of Reasonable Alternatives. By not assessing the most sustainable spatial scenario of distributing development to higher tier Key Service Settlements within the Green Belt, the SA fails to provide a range of Reasonable Alternative spatial scenarios. This has led to the draft housing allocations not being selected in preference to possible alternatives, based on a robust, objective and consistent approach and the Draft Local Plan is unjustified and, therefore, unsound.</p>	<p>The IIA has appraised the Local Plan Review from Issues &amp; Options Stage through to Pre-Submission. The Local Plan Review contains reasonable alternatives as spatial, site and policy options.</p> <p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected.</p> <p>The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Pre-Submission Consultation Document presents a range of sites at various spatial scales which are considered to be capable of meeting the identified development requirements.</p> <p>As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that:</p> <ul style="list-style-type: none"> <li>- Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.</li> </ul>



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				<ul style="list-style-type: none"> <li>- An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”.</li> <li>- The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.”</li> </ul> <p>A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA.</p> <p>No change to the IIA.</p>
<b>PSIIA-28</b>	The Bucknell Family	Reasonable Alternatives	<p>Settlement Hierarchy</p> <p>3.1 Utilising a settlement hierarchy, to guide the distribution of development within the administrative area, is deemed a logical and conventional approach, which has been successfully employed in the preparation of numerous sound Local Plans in recent years. This method can be a valuable tool for ensuring a sustainable distribution of development, although it is crucial that its application to policies and allocations should not be overly simplistic and should account for broader sustainability considerations.</p> <p>3.2 However, in respect of employment growth, as currently set out the Plan does not consider the objective of promoting a prosperous rural economy and does not recognise that many employment allocations are more sustainably delivered around transport corridors, rather than focusing on a settlement hierarchy, which is</p>	<p>Comments on rewording use of settlement hierarchy in Strategic Policy S7 are noted.</p> <p>Comments on exploring higher growth scenarios and additional allocations in sustainable settlements and Green Wedge are noted.</p> <p>The Settlement Hierarchy is just one of several considerations for the Spatial Strategy, along with the Vision and Spatial Principles, and is considered to be a robust approach.</p> <p>Comments on exploring higher growth scenarios and additional allocations in sustainable settlements are noted.</p>

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			<p>generally a more appropriate mechanism for directing housing allocations to the most sustainable locations.</p> <p>3.3 Although we broadly agree with the use of a settlement hierarchy to inform decisions regarding the scale of growth directed to various settlements within the Borough, the current wording of the policy text makes it unclear how the settlement hierarchy outlined in Strategic Policy S7 is to be utilised by decision-makers.</p> <p>3.10 The Integrated Impact Assessment (IIA) acknowledges in assessing reasonably alternative spatial options, that for the transitional and higher growth levels additional site options over and above the existing Local Plan allocations will be required in order to meet residential and employment needs (paragraph 6.4.29).</p> <p>3.18 The IIA has failed to properly test all reasonable alternatives and therefore the proposed Spatial Strategy, which has discounted all sites within the Green Wedge without properly assessing them, or the Green Wedge Designation, as a reasonable alternative, is unjustified and unsound.</p>	<p>The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process and can meet its development requirements without needing to undertake a Green Wedge review. This approach accords with the evidence base.</p> <p>As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that:</p> <ul style="list-style-type: none"> <li>- Reasonable alternatives does not include all possible alternatives: the use of the word “reasonable” clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.</li> <li>- An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”.</li> <li>- The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.”</li> </ul> <p>A range of development quanta, broad distributions of development and site options available have been tested</p>

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				<p>through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA.</p> <p>No change to the IIA.</p>
<b>PSIIA-27</b>	The Bucknell Family	Para 6.4.11	The IIA acknowledges that the Council received approaches from Castle Point Borough Council, Southend on Sea City Council and Basildon Borough Council requesting that Chelmsford help meet unmet housing need through its Local Plan allocations (paragraph 6.4.11) and that there is no capacity in Chelmsford's proposed Spatial Strategy to accommodate any unmet housing need from neighbouring or nearby local authorities (paragraph 6.4.14). It would seem therefore entirely logical and appropriate to test spatial options that comprise release of land and sites from the Green Belt and/or Green Wedge in order to address unmet neighbouring housing need. As acknowledged in paragraph 6.4.15, even providing the full standard method assessment of 1,454 homes dpa would provide capacity for neighbouring unmet need.	<p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected.</p> <p>The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process and can meet its development requirements without needing to undertake a Green Wedge review. This approach accords with the evidence base.</p> <p>The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Pre-Submission Consultation Document presents a range of sites at various spatial scales which are considered to be capable of meeting the identified development requirements.</p> <p>No change to the IIA.</p>
<b>PSIIA-32</b>	Crest, Dandara, and Taylor Wimpey	Para 6.4.9	2.9 It is evident that the transitional arrangements are not intended to be used as an excuse to unnecessarily restrict development to pre-National Planning Policy Framework (NPPF) 2024 requirement levels. Where there are suitable, available and achievable sites that	The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process and has demonstrated that it can meet its development

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	Strategic Land (TWSL)		<p>are able to increase housing delivery closer to the levels required by the NPPF 2024, the emerging Local Plan should support their delivery.</p> <p>2.11 It is also noteworthy how the option to deliver higher growth has been considered through the sustainability appraisal of the Draft Local Plan (DLP), incorporated within the IIA.</p> <p>2.12 The sustainability appraisal (or IIA in this case) is of particular relevance for two reasons.</p> <p>2.13 Firstly, the NPPF (paragraph 32) is clear on the importance of sustainability appraisal in the plan-making process.</p> <p>2.14 Secondly, that the preparation of a new Local Plan is required to required to comply with the Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No.1633) ('the SEA Regulations'), which transposes the plan-making elements of European Directive 2001/42/EC ('the SEA Directive') into UK law.</p> <p>2.15 The SEA Regulations require that for plans such as the new Chelmsford Local Plan, an Environmental Report is prepared. In this case, the IIA seeks to discharge this obligation.</p> <p>2.16 The Environmental Report is required to identify, describe, and evaluate the likely significant effects on the environment of proposed options, as well as on reasonable alternatives (Regulation 12(2) of the SEA Regulations).</p> <p>2.17 Regulation 12(3) further sets out the information required to be included within the Environmental Report, referencing Schedule 2 of the SEA Regulations. Schedule 2 states that SA/SEA should consider short-, medium- and long-term effects; permanent and temporary effects; positive and negative effects; and secondary, cumulative and synergistic effects.</p>	<p>requirements as set out in Policy S7. This approach accords with the evidence base.</p> <p>The housing requirement in the plan meets at least 80% of the revised standard method housing need in line with the Government's latest plan-making transitional arrangements. Additional housing site allocations are not required.</p> <p>As noted in the IIA analysis (p.190) whilst Option 3 would meet the full needs identified through the revised Standard Method (1,406 dwellings per annum) and is therefore also identified as having the potential for a long-term significant positive effect. The housing delivery rates over the past 10 years have been in the order of 1,000 dwellings per annum. Whilst the provision of a quantum of housing beyond the transitional need is likely to provide additional flexibility in delivery and choice of tenure, over-delivery could be disruptive to the local housing market with demand failing to match supply and potentially stalled developments. As a result, there is an element of uncertainty in relation to Option 3. Thus the identification of uncertainty reflects a reasonable concern that growth would disrupt the chosen plan approach in respect of transitional growth.</p> <p>As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that:</p> <ul style="list-style-type: none"> <li>- Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to</li> </ul>

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			<p>2.18 As confirmed through case law (see Heard), whilst it is not necessary to keep open all options for the same level of detailed examination at all stages, at each stage the preferred option and reasonable alternatives must be assessed to the same level of detail. This includes considering alternatives for any modifications to a plan, even if late in the plan-making process.</p> <p>2.19 In terms of the approach taken by the DLP to considering meeting the housing needs the 2024 NPPF, the IIA appears to acknowledge that planning to meet this higher growth figure is as reasonable alternative at paragraph 6.4.9 where it states: “Based on the evidence set out above, it is considered reasonable to explore alternatives for the following levels of housing growth:</p> <ul style="list-style-type: none"> <li>• Lower growth (approx. 955 dpa or 18,145 total dwellings) based on the Strategic Housing Needs Assessment (SHNA) published in 2023 and previous Standard Method. While it could be argued that this is not a reasonable alternative as it is not in line with the revised NPPF and Standard Method, it is being taking forward for further consideration as a number of representations were received from the public on the Preferred Strategy questioning the level of growth proposed in the plan.</li> <li>• Transitional growth (approx. 1,206 dpa or 22,990 total dwellings) based on the housing need identified through the revised Standard Method and transitional arrangements.</li> <li>• Higher growth (approx. 1,406 dpa or 26,714 dwellings) based on the full housing need identified through the revised Standard Method published for consultation in September 2024. The higher level of growth proposed through the December 2024 NPPF and Standard Method has not been considered further at this stage as it was not available in sufficient time for consideration through this report.”</li> </ul> <p>2.20 As per the emphasised text in the preceding paragraph, the IIA appears to confirm that the housing requirement generated by the 2024 NPPF and its accompanying Standard Method is a reasonable alternative, but at the same time admit it has not been assessed, let alone to the same level of detail as the selected option.</p>	<p>which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.</p> <ul style="list-style-type: none"> <li>- An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”.</li> <li>- The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.”</li> </ul> <p>A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA.</p> <p>No change to the IIA.</p>

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			<p>2.21 It is questionable whether a perceived inability to assess this option due to purported time constraints is a sufficient reason to fail to assess an option acknowledged to be a reasonable alternative as required by the SEA Regulations.</p> <p>2.22 Notwithstanding the above and the commentary within the IIA at paragraph 6.4.9., we note that the IIA has assessed a higher growth scenario, albeit in the context of options for the spatial strategy. Spatial Strategy Option 3.</p> <p>2.23 It is somewhat unclear what Spatial Strategy Option 3 assessed entails. At Table 6.3, the IIA states that Option 3 includes an increased number of dwellings in a number of locations, including West and North West Chelmsford. It confirms this option includes elements that make up the Site: 21SHELAA41, CFS165, and party of CFS182.</p> <p>2.24 Conversely, and seemingly directly contradicting Table 6.3, in Table 6.4 of the IIA it reports that Spatial Strategy Option 3 would involve provision of zero additional homes in West and North West Chelmsford; but that it would encompass provision of additional employment floorspace.</p> <p>2.25 Irrespective of this, and focussing on the matter of housing quantum only (as opposed to spatial strategy), the commentary on page 186 of the IIA provides the following view on Option 3: “The higher growth option (Option 3) performs more poorly overall reflecting greater resource use with greater uncertainty overall such as potential oversupply of housing in the plan period disrupting coordinated delivery against identified need”</p> <p>2.26 There are two elements to the above that merit comment.</p> <p>2.27 Firstly, the IIA refers to an “oversupply”. We consider that in the context of the Government’s clear exhortation to maximise provision of housing, any criticism of an option on the basis it would provide too many homes, without identifying any specific harm with such an approach is fundamentally flawed.</p>	

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>2.28 Secondly, it is unclear what is meant by an oversupply of homes “disrupting co-ordinated delivery against identified need” – a Local Plan with a higher housing requirement would be able to provide a coordinate approach to meeting a higher figure.</p> <p>2.29 For the above reasons, and having regard to other sustainable and deliverable sites that the emerging Local Plan does not currently propose to allocate (discussed further within Section 3) the proposed housing requirement is not considered sound.</p>	
<b>PSIIA-31</b>	Crest, Dandara, and Taylor Wimpey Strategic Land (TWSL)	Table 6.3 and 6.5	<p>3.22 The IIA includes consideration of most of the Site (as part of a group of sites that have been grouped together as ‘West and North West Chelmsford’) as one of the potential spatial strategies: Option 2c.</p> <p>3.23 Table 6.3 of the IIA describes Option 2c as follows: Transitional growth includes existing adopted Local Plan allocations, new brownfield and small site options, West and North West Chelmsford (21SHELAA41; CFS165; CFS182 (Part); CFS82; CFS80; 21SHELAA100; 21SHELAA17; CFS183) and Land East and West of the A12, North and North West of Howe Green Sandon (CFS55).</p> <p>3.24 Table 6.5 of the IIA suggests Option 2c scores very similarly to Option 2a (the selected option).</p> <p>3.25 The three outline reasons given for the rejection of Option 2c are set out at paragraph 6.4.51 of the IIA, which states, in full: • “Although adjacent to the Chelmsford Urban Area, the sites at West and North West Chelmsford have poorer connectivity into the urban area of Chelmsford, and as such they are relatively isolated from the strategic highway network. There are less [sic] opportunities [to] create sustainable routes to existing public transport or provide new Bus Based Rapid Transit infrastructure. • The sites that comprise the West and North West Chelmsford site option are under multiple ownerships, which may delay delivery and result in piecemeal development. • Employment opportunities would be less accessible to the wider population (for example through public transport).”</p>	<p>Disagreement with the analysis is noted. Option 2c comprises a number of sites which together could deliver the transitional growth requirement and in-principle represent a reasonable alternative. However there is no evidence that Option 2c performs any better than the preferred allocations in respect of matters such as self-containment through mixed use development, relationship to established transport infrastructure and certainty of delivery, the latter influenced by the fact that the option comprises a number of sites under multiple ownerships.</p> <p>In respect of the commentary on Option 3, the identification of uncertainty reflects a reasonable concern that growth would disrupt the chosen plan approach in respect of transitional growth.</p> <p>No change to the IIA.</p>

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>3.26 Turning to the first reason given for rejecting the Site, we reject the assertion that development to the west of Chelmsford lacks opportunities to create sustainable routes to existing public transport or provide new public transport infrastructure.</p> <p>3.27 As set out in the Concept Masterplan for the Site (provided as Appendix A), this includes provision for a new park &amp; ride / mobility hub. In addition, the Site is accessible from across the city for pedestrians and cyclists, and by bus. There are pedestrian and cycle connections into the city via the Chignal Estate and Admirals Park, and to Writtle. These connect the Site to secondary schools, the city centre, and train and bus stations. Existing bus services on Roxwell Road could be diverted into the Site to provide additional connections to the city centre and to Writtle.</p> <p>3.28 The Site would represent a logical extension to an existing growth location coming forward (West Chelmsford) for which the approved masterplan confirms will include additional footpaths and cycleways, which could also benefit development of the Site.</p> <p>3.29 In respect of the second reason for rejection, the promoters of the three parcels that comprise the Site are taking a coordinated approach to its development, as demonstrated by the preparation of the Concept Masterplan for the Site and, indeed, by this representation itself.</p> <p>3.30 Thirdly, in relation to employment opportunities be less accessible (than to the selected employment site at Location 16b) whilst this may be the case, this is only relevant to the Site / West and North West Chelmsford, if one excepts any spatial strategy options entailing a residential-led development of the Site would necessarily have to be accompanied by the employment development at Howe Green, Sandon (CFS55).</p> <p>3.31 However, it is patently not the case. Indeed, there is nothing to suggest that a residential-led development of the Site in West Chelmsford would be intrinsically linked to provision of employment</p>	



Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>land at Howe Green (south of Chelmsford). There is no reason, for example, why residential-led development at West Chelmsford along with employment development at Location 16b (the selected employment site) could not be considered a potential spatial strategy.</p> <p>3.32 It is unclear to what degree this baseless grouping of development at West Chelmsford with employment development at Howe Green into a single option has infected the assessment of the former's sustainability to form part of a spatial strategy for the borough. But the third reason for the rejection of Option 2c demonstrates it has been determinative to at least some degree. Furthermore, the first reason appears more applicable to employment development at Howe Green (somewhat detached from the City) than it does to a westward extension to Chelmsford.</p> <p>3.33 In effect, the IIA presents a false choice, with West Chelmsford compared with other options only as part of an option that includes employment development at Howe Green.</p> <p>3.34 Option 3 is considered by the IIA as a higher growth option that combines Options 2a with 2c.</p> <p>3.35 The clear advantage of this over (or rather, in combination with) the selected Option 2a, is that Option 3 would better reflect the Government's call to maximise the potential for housing delivery as well as addressing affordable housing needs. However, the benefit of this is not reflected in the IIA appraisal of the Site against SA objective 2 – not only is this option scored no better than option that will deliver far fewer homes, but some of the commentary is somewhat negative, with the IIA stating that: "Whilst the provision of a quantum of housing beyond the transitional need is likely to provide additional flexibility in delivery and choice of tenure, over-delivery could be disruptive to the local housing market with demand failing to match supply and potentially stalled developments. As a result, there is an element of uncertainty in relation to Option 3".</p>	

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			<p>3.36 As per our comments in respect of Strategic Policy S6 set out in Section 2 of this representation, the view that an option could deliver too many homes is clearly baseless in the light of current national policy and guidance; particularly when such a number is merely that for which a future Local Plan would be required to deliver.</p> <p>3.37 Nevertheless, we note that the reasons for rejection of Option 3 do not cite its performance against the housing objective. Instead the reasons given are, in full, as follows: “Option 3 is rejected because: • Lack of strategic highway capacity at Junction 17 of the A12 and no deliverable junction improvements planned to accommodate strategic scale employment growth at this location. • Its relative isolation from existing residential areas, services and facilities which would lead to higher reliance on the use of the private car, including for access to employment. • This location has lower landscape capacity to accommodate employment development compared with the Council’s preferred option at Location 16b.</p> <p>3.38 All of the above reasons appear to relate solely to the inclusion of land at Howes Green, Sandon as an employment allocation, i.e. they fail to consider a higher growth option that includes West / North West Chelmsford, plus Location 16a and 16, but not employment development at Howes Green, Sandon.</p> <p>3.39 Again, a false choice has been presented – one in which the higher growth option is only an option when it encompasses employment development at a particular location, one deemed unsustainable (or, at the very least, less sustainable).</p> <p>3.40 The fallacy of the IIA’s conclusions is further evident by the fact that in its outline reasons for the rejection of Option 3, it cites Location 16b as being preferable in terms of landscape impacts, when Option 3 includes Location 16b (Land adjacent to A12 Junction 18 Employment Area (21SHELAA5)), as confirmed in IIA Table 6.4.</p>	

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			3.41 There is a potential solution to these issues, and we consider the DLP is still capable of being made sound. The IIA should consider an additional higher growth option, but one that excludes employment development at Howe Green.	
<b>PSIIA-14</b>	Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group	Table 5.10	<p>We strongly object to the ratings given to Site Refs. 16a and 16b. We note that the scores for both sites have improved since the Regulation 18 Draft IIA, and this is despite there being only very minimal tweaks made to the wording of the proposed allocations in the Regulation 19 draft Local Plan. Specifically, we note that the Council's own evidence base on transport impact identifies key areas of concern in relation to the highways effects of the development of the two strategic sites, and thus it is not clear why the sites do not score 'significant negative impact' for this criterion. Very high impacts have also been identified in relation to the loss of an area of high landscape value, and impact on the significance of a range of designated heritage assets at Hammonds Farm. The mitigation proposed is minimal, and not sufficient to address the high impacts identified. Site 16a should also receive a 'significant negative impact' score for these two criteria. Site 16b lies within a Minerals Safeguarding Area, and thus it is unclear why is scores 'neutral' for the 'Waste and Natural Resources' criterion. Development of this site will also have significant adverse impacts in relation to harm to heritage assets, and should score 'red' for this criterion also.</p> <p>In our submitted main representations to the Regulation 19 Draft Local Plan, we have identified substantial and significant adverse impacts that will arise from the development of both sites 16a and 16b. The draft Local Plan does not explain how these impacts can be adequately mitigated. It is thus our view that the IIA has underestimated the impacts associated with the development of these strategic sites, and we request that the assessment is revisited, particularly with regards to the criteria of 'transport', 'waste and natural resources', 'cultural heritage' and 'landscape and townscape'. No justification has been provided for why the rating of the sites has changed between the Regulation 18 and Regulation 19 draft IIA. The change to the scoring is illogical, given that only</p>	<p>Objection to the improvement of ratings for sites 16a and 16b are noted.</p> <p>Additional information on site development provided by the site proposers in their Regulation 18 Preferred Options representations has been considered by the Council alongside other Regulation 18 representations, the plan evidence base and Statement of Common Ground. Consequently, the site-specific policy was improved and strengthened in the Pre-Submission Local Plan including in relation to minimising and mitigating potential landscape, biodiversity, heritage, flood risk and heritage impacts. The IIA has taken account of these site policy changes and the scoring adjusted accordingly.</p> <p>No change to the IIA.</p>

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			very minor tweaks have been made to the proposed wording of the allocations.	
<b>PSIIA-44</b>	Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group	6.6.40	<p>4.25 The Local Plan Pre-Submission Integrated Impact Assessment (IIA) considers an alternative option (Option 2c), whereby 3,000 new homes and 43,000 sq.m of employment floorspace could be located on identified development parcels within West and North West Chelmsford (on site refs. 21SHELAA41; CFS165; CFS182 (part); CFS82; CFS80; 21SHELAA100; 21SHELAA17; and CFS183).</p> <p>4.26 This alternative option would deliver the same benefits in terms of housing and employment land provision as Hammonds Farm, but in a location that is sited directly adjacent to the existing built-up area of Chelmsford. The IIA explains that Option 2c is rejected because – although adjacent to the Chelmsford Urban Area – the sites have poorer connectivity into the urban area, and are relatively isolated from the strategic highway network. It is also noted that there are less opportunities to create sustainable routes to existing public transport or provide new Bus Based Rapid Transport Infrastructure. It is noted that the area contains sites in multiple ownership and employment opportunities would be less accessible to the wider population.</p> <p>4.27 We disagree with this analysis. The plots have all been submitted as part of the Council's Call for Sites exercise and are shown to be 'green' for availability in the Strategic Housing and Employment Land Availability Assessment (SHELAA), meaning that they are held by a developer / willing owner / public sector, and should therefore be considered to be available for development. The fact that the sites are in different ownerships should not in itself represent a constraint to development. Indeed, it is common for strategic developments to proceed on land which is owned by a consortium of parties.</p> <p>4.28 With regards to the site's accessibility, the plots lie adjacent to the existing urban area, and existing, direct pedestrian / cycle connections are available to Chelmsford City Centre via Roxwell Road (the A1060). In addition, the sites benefit from close proximity</p>	<p>The reasons for rejection of Option 2c are set out within the Pre-Submission IIA Report (para 6.4.51 p.187), namely:</p> <ul style="list-style-type: none"> <li>• Although adjacent to the Chelmsford Urban Area, the sites at West and North West Chelmsford have poorer connectivity into the urban area of Chelmsford, and as such they are relatively isolated from the strategic highway network. There are less opportunities create sustainable routes to existing public transport or provide new Bus Based Rapid Transit infrastructure.</li> <li>• The sites that comprise the West and North West Chelmsford site option are under multiple ownerships, which may delay delivery and result in piecemeal development.</li> <li>• Employment opportunities would be less accessible to the wider population (for example through public transport).</li> </ul> <p>Disagreement with the analysis is noted; however there is no evidence that Option 2c performs any better than the preferred allocations in respect of matters such as self-containment through mixed use development, relationship to established transport infrastructure and certainty of delivery.</p> <p>No change to the IIA.</p>

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			<p>to existing infrastructure in the western part of Chelmsford, including existing bus stops / routes (along Roxwell Road, Avon Road and Chignal Road); a Morrisons foodstore, library, community hall, and Chelmsford City Football Club stadium. Whilst further enhancements and infrastructure would necessarily be delivered as part of the strategic development proposals, it is clear that there is a foundation upon which to build, and the plots are well-located with regards to the existing facilities within Chelmsford.</p> <p>4.29 Moreover, the Pre-Submission Local Plan does propose to allocate one site in this area, directly adjacent to the plots identified above. Draft Strategic Growth site Policy 2 is proposed for a 'sustainable neighbourhood', that maximises opportunities for sustainable travel, and that will deliver 880 new homes, a Travelling Showpeople site for 5 serviced plots, a new neighbourhood centre, and a new primary school. The site will take main vehicular access from Roxwell Road, and will provide "safe and convenient pedestrian and cycle connections", including new dedicated pedestrian and cycle links to the existing urban area, and well-connected internal road layouts to allow good accessibility for bus services. The policy justification text (paragraph 7.115) describes the site as offering: "an opportunity for a landscape- led sustainable urban extension that maximises opportunities for travel by sustainable modes".</p> <p>4.30 As such, it is unclear why the other sites identified within the West and North West Chelmsford area, which lie directly adjacent to both the existing urban area and the planned development at Site Policy 2, have been ruled out as a potential suitable and sustainable location to accommodate future growth.</p> <p>4.31 Taking the above into account, it is unclear why the IIA should favour Hammonds Farm, which is entirely disconnected from the urban area; where the A12 is a physical barrier to movement; and where the delivery of convenient and efficient active and sustainable travel linkages will be challenging.</p>	

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			4.32 Moreover, the IIA should also take into account the fact that the plots in West and North West Chelmsford are potentially less constrained than Hammonds Farm, and it is our view that growth in this direction would represent a less harmful strategy. We note that the main plots of land in West and North West Chelmsford score well in terms of their 'suitability' in the Council's Strategic Housing and Employment Land Availability Assessment (SHELAA, Autumn 2024).	
<b>PSIIA-18</b>	Cliffords Group Ltd	Para 6.4.11	<p>The IIA confirms that site options within the Metropolitan Green Belt and Green Wedge would not be considered as part of the spatial options to meet residual needs. This, it explains, is primarily because there are sufficient and suitable site options available outside of these areas in order to meet the proposed development requirements. However, meeting development needs is not simply about fulfilling housing numbers to accommodate future growth in purely numerical terms — it is incumbent upon the plan-making process to ensure the Local Plan will do so in a sustainable manner. Case law (e.g. Calverton ) confirms that a key factor in determining whether there are exceptional circumstances which justify alterations to the Green Belt is whether it is possible to meet development needs sustainably without doing so.</p> <p>The IIA further states that Chelmsford's proposed Spatial Strategy has no capacity to accommodate unmet housing needs from neighbouring authorities (paragraph 6.4.14). Therefore, it would be logical and appropriate to test spatial options involving the release of land from the Green Wedge to help address this shortfall. As acknowledged in paragraph 6.4.15, even providing the full standard method assessment of 1,454 homes per annum would create capacity for some neighbouring unmet need — a scenario based on a spatial option that does not release land for housing from the Green Wedge.</p> <p>The IIA has therefore failed to test all reasonable alternatives. Discounting all sites within the Green Wedge without properly assessing them as reasonable alternatives makes the proposed Spatial Strategy unjustified and unsound.</p>	<p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected.</p> <p>The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process and can meet its development requirements without needing to undertake a Green Wedge review. This approach accords with the evidence base.</p> <p>The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Pre-Submission Consultation Document presents a range of sites at various spatial scales which are considered to be capable of meeting the identified development requirements.</p> <p>As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of</p>

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				<p>growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that:</p> <ul style="list-style-type: none"> <li>- Reasonable alternatives does not include all possible alternatives: the use of the word “reasonable” clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.</li> <li>- An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”.</li> <li>- The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.”</li> </ul> <p>A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA.</p> <p>No change to the IIA.</p>
<b>PSIIA-19</b>	Cliffords Group Ltd	Para 6.4.29	The Integrated Impact Assessment (IIA) acknowledges that to meet residential and employment needs under transitional and higher growth levels, additional site options beyond the existing Local Plan allocations will be required (paragraph 6.4.29).	The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process and can meet its development requirements without needing to

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>The IIA suggests that residual housing needs can be met without using sites within the Green Wedge. However, it also notes that Chelmsford City Council has received requests from Castle Point Borough Council, Southend-on-Sea City Council, and Basildon Borough Council to help meet their unmet housing needs through Chelmsford's Local Plan allocations (paragraph 6.4.11). The IIA further states that Chelmsford's proposed Spatial Strategy has no capacity to accommodate unmet housing needs from neighbouring authorities (paragraph 6.4.14). Therefore, it would be logical and appropriate to test spatial options involving the release of land from the Green Wedge to help address this shortfall.</p> <p>As acknowledged in paragraph 6.4.15, even providing the full standard method assessment of 1,454 homes per annum would create capacity for some neighbouring unmet need — a scenario based on a spatial option that does not release land for housing from the Green Wedge.</p> <p>The IIA has therefore failed to test all reasonable alternatives. Discounting all sites within the Green Wedge without properly assessing them as reasonable alternatives makes the proposed Spatial Strategy unjustified and unsound.</p> <p>However, the Spatial Strategy can be made sound by allocating sites within the Green Wedge, such as land south of Wheelers Hill, to support higher housing delivery and, in part, help meet the unmet housing needs of neighbouring authorities.</p>	<p>undertake a Green Wedge review. This approach accords with the evidence base.</p> <p>The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Pre-Submission Consultation Document presents a range of sites at various spatial scales which are considered to be capable of meeting the identified development requirements.</p> <p>As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that:</p> <ul style="list-style-type: none"> <li>- Reasonable alternatives does not include all possible alternatives: the use of the word “reasonable” clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.</li> <li>- An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”.</li> <li>- The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a</li> </ul>



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				<p>reasonable alternative and it does not have to be included in the SEA Report or process.”</p> <p>A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA.</p> <p>No change to the IIA.</p>
<b>PSIIA-26</b>	Taylor Wimpey Strategic Land	Reasonable Alternatives	<p>In respect of the broad locations and strategic approach advocated by Strategic Policy S7, and in addition to the concerns set out in the Joint Representation, we wish to raise the following.</p> <p>The IIA notes six spatial strategy options that were considered, but that it only considers the Site as part of a much larger growth in West Chelmsford, despite the availability of smaller sites to the west of Chelmsford to come forward either individually or as part of more strategic growth. The exploration of potential spatial strategies, and the appraisal of options, should not be limited to those that entail large-scale strategic growth to the west of Chelmsford.</p> <p>One consequence of the proposed spatial strategy's focus on large-scale strategic growth sites is that the Draft Local Plan (DLP) becomes reliant on a small number of large, potentially complex, sites to deliver housing. This does not render the allocation of such sites unsound, but the over-reliance on such sites to meet housing needs without additional allocation of smaller sites to ensure the new Local Plan is imbued with sufficient flexibility to be able to meet housing needs in a timely manner, is a soundness issue.</p> <p>In such circumstances, it is particularly important to ensure a range of different sites that can address housing needs in the event progress of others is slowed.</p>	<p>The reasons for rejection of Option 2c are set out within the Pre-Submission IIA Report (para 6.4.51 p.187), namely:</p> <ul style="list-style-type: none"> <li>• Although adjacent to the Chelmsford Urban Area, the sites at West and North West Chelmsford have poorer connectivity into the urban area of Chelmsford, and as such they are relatively isolated from the strategic highway network. There are less opportunities create sustainable routes to existing public transport or provide new Bus Based Rapid Transit infrastructure.</li> <li>• The sites that comprise the West and North West Chelmsford site option are under multiple ownerships, which may delay delivery and result in piecemeal development.</li> <li>• Employment opportunities would be less accessible to the wider population (for example through public transport).</li> </ul> <p>Disagreement with the analysis is noted; however there is no compelling evidence that Option 2c performs any better than the preferred allocations in respect of matters such as self-containment through mixed use development, relationship to established transport infrastructure and certainty of delivery.</p>

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>Separately, as noted within the Joint Representations but also of particular relevance to the Site, it is notable that the criticisms and reasons given for the rejection of options that entail large-scale growth to the west of Chelmsford appear largely confined to the provision of employment land at Howe Green, which has been rolled into the option that includes West Chelmsford. In short, the IIA does not justify the rejection of the Site / West Chelmsford as it is required to do, bearing in mind the intended purposes of the IIA as per the NPPF and the requirements of the SEA Regulations.</p>	<p>As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the Borough. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that:</p> <ul style="list-style-type: none"> <li>- Reasonable alternatives does not include all possible alternatives: the use of the word “reasonable” clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.</li> <li>- An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”.</li> <li>- The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.”</li> </ul> <p>A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA.</p>

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
				No change to the IIA.
<b>PSIIA-34</b>	Tritton Farming Partnership LLP	6.6.40	<p>The reasons for the rejection / selection of options are set out in the Integrated Impact Assessment which accompanies the Local Plan Pre-Submission (Regulation 19) Document. The IIA seeks to discharge the Council's obligations under Directive 2001/42/EC ('the SEA Directive'); the plan-making aspects of which are transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No.1633) ('the SEA Regulations'). Such requirements include the need to assess reasonable alternatives to the same level of detail as those that have been selected; and to explain the reason for rejection / selection of options.</p> <p>3.43 Looking specifically at the consideration of the Site as part of Option 2b, the IIA provides the following reasons for rejection of the Options :</p> <ul style="list-style-type: none"> <li>• Chatham Green is relatively isolated from the strategic highway network and new railway station, with limited sustainable accessibility or opportunity for solutions.</li> <li>• Its relative isolation from existing services and facilities which would lead to higher reliance on the use of the private car.</li> <li>• Landscape capacity and sensitivity concerns.</li> <li>• There is limited wastewater capacity to accommodate this development (Water Cycle Study 2024).</li> <li>• Employment opportunities would be less accessible to the wider population (for example through public transport). 3.44</li> </ul> <p>Firstly, that Chatham Green is relatively isolated from the strategic highway network and new railway station, with limited sustainable accessibility or opportunity for solutions. The Site would utilise significant infrastructure improvements being delivered and planned (as large scale proposals should), most notably the CNEB and Beaulieu Park Rail Station. Furthermore, it has the potential to help ensure that Section 1b and Section 2 of the CNEB are delivered, with resultant benefits to the wider community.</p>	<p>Disagreement with the analysis is noted; however there is no compelling evidence that the Chatham Green Site performs any better than the preferred allocations in respect of matters such as self-containment through mixed use development, relationship to established transport infrastructure and certainty of delivery.</p> <p>As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that:</p> <ul style="list-style-type: none"> <li>- Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.</li> <li>- An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan, is not a "reasonable alternative".</li> <li>- The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process."</li> </ul>

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>3.45Secondly, that Chatham Green is relatively isolated from existing services and facilities, and consequently growth at this location would lead to reliance on the private car. The IIA's concerns in respect of the Site's isolation from services and facilities is misplaced, as it overlooks that a new community is proposed of a scale such that some services and facilities will be provided as part of the new development, and in close proximity to future residents. Furthermore and in any case, the Site is in proximity to a number of existing services and facilities planned or recently brought forward as part of strategic scale growth in North East Chelmsford which are accessible / can be made accessible by sustainable transport modes as part of development of the Site, including the existing bus routes along the A131 and the cycle routes planned for CNEB.</p> <p>3.46Thirdly, landscape capacity and sensitivity. The justification for this stance is unclear. Land to the east of Chatham Green is not subject to any landscape designations which suggest it is any more sensitive than any other greenfield land in the borough.</p> <p>3.47Fourthly, that there is limited capacity at the wastewater recycling facilities serving the area. A Foul Drainage Technical Note was commissioned to consider the capacity concerns raised and whether there are any potential options to mitigate this. A copy of this Technical Note is provided as Appendix D. The Technical Note confirms that this potential constraint can be overcome, identifying three options. One option includes utilising land under the Tritton Farming Partnership's control.</p> <p>3.48Lastly, that employment opportunities would be less accessible to the wider population (for example through public transport). Development on the site could be at a scale that provides the opportunity for improvements to public transport and sustainable travel including the existing bus routes along the A131 and the cycle routes planned for CNEB.</p> <p>3.49In overview, none of the reasons cited by the IIA for the rejection of strategic level growth at Chatham Green are applicable to the Site (i.e. are not applicable to Land East of</p>	<p>A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA.</p> <p>No change to the IIA.</p>

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			Chatham Green) and its proposed development for a new community.	
<b>PSIIA-10</b>	CHP	Para 5.8	It is important to highlight an apparent error in the Pre-Submission Integrated Impact Assessment whereby the results in the summary Table 5.8 do not align with the results set out in the full assessment provided in Appendix G.	Comments on inconsistencies in scoring are noted. Appendix G is correct and the summary scores presented in Table 5.8 will be updated.
<b>PSIIA-10</b>	CHP	Para 5.8	4.3 Subject to confirmation from the Council on which table provides the correct assessment of this site, our client considers the apparent assumption (through the negative air and water quality scores) that building more homes automatically results in an increase in population, to be unsound. There are no known air or water quality issues for this site for example, and as such the score appears to relate to the perceived increase of water usage and/or traffic movements. This would not necessarily be the case should at least the majority of residents already live in Chelmsford. This is particularly likely for the development of Andrews Place as if the majority of units are affordable homes, they will be used to house those in need of housing within the Chelmsford District. Please see accompanying document.	<p>The assessments are made in respect of specific aspects of the site option (air quality, water quality, and new infrastructure requirements) in light of available evidence, and the requirements of Development Management Policies which will implement mitigation in response to the detailed plans submitted by site proposers. The IIA considers housing and population increase across the Plan area and a working assumption is that resource use will increase, albeit with efficiencies, such as in water consumption. Furthermore, water supply forecasting is based on increased demand.</p> <p>The role of the IIA is to present an assessment of likely effects and where opportunities exist for their mitigation in light of proposed policies, and consequently enhancement of their overall sustainability performance and in respect of individual measures.</p> <p>No change to the IIA.</p>
<b>PSIIA-52</b>	Dandara	Chapter 5	<p>3.4 Chapter 5 of the IIA sets out the assessment of the proposed growth areas and associated proposed site allocations. As mentioned in earlier parts of these representations, part of Land East of Pleshey Road, Ford End has been allocated within the Pre-Submission Local Plan for 20 dwellings.</p> <p>3.5 Table 5.9 provides a summary of the appraisal of proposed allocations in Growth Area 2 – North Chelmsford. The table has identified that the site allocation at Ford End (under Policy 14 b) would make a very positive contribution to the IIA priority of providing more homes in Chelmsford. The assessment notes the</p>	<p>Comments of support are noted.</p> <p>Comments on recognition of biodiversity effects are noted. The sustainability performance of the site and wider land is noted. Appendix M sets out the comparative GIS analysis of proposed allocations and reasonable alternatives to help inform the site selection process.</p> <p>The Council has considered the suitability of alternative development strategies and sites to accommodate</p>

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>site allocation also provides a positive contribution toward sustainable living and revitalisation, as well as mixed, minor or uncertain impacts on biodiversity, health and wellbeing and transport. The site allocation would have a small negative impact on cultural heritage and landscape and townscape. The only major negative impact identified in the assessment relates to land use. Further commentary and explanation of this appraisal is provided at various points in the IIA.</p> <p>3.6 Dandara agree that the allocation of the site at Ford End will have benefits towards the housing supply and the sustainability and revitalisation of the village of Ford End. We do, however, consider that the IIA should also recognise the benefits to biodiversity which will be provided through the provision of 10% BNG as well as benefits to transport which will be delivered through appropriate highway improvements and measures to promote and enhance active travel. Equally, the development of the site would also provide benefits to the local economy through use of local firms for construction as well as the new residents providing enhancement to the local economy through use of local facilities and services. It is considered the impacts to cultural heritage should be considered neutral as the site allocation already requires a scheme which is sensitive to the non-designated heritage asset of Ford End Primary School.</p> <p>3.7 The IIA concludes that the Site complies well with the Strategic Priorities, Vision, Spatial Principles and Spatial Strategy, in particular with regard to the Settlement Hierarchy. The Site is also supported by the evidence base for the Plan, such as the Heritage Assessment and Landscape Capacity and Sensitivity Assessment. Overall, the IIA has not found any constraints which would hinder the deliverability, viability or availability of the site. Dandara completely support and agree with these conclusions.</p> <p>3.8 The wider Site which was submitted to the Call for Sites, as well as promoted through the previous Local Plan consultations, covered 5.37 hectares and has the capacity to provide up to 50 homes. This iteration of the IIA no longer provides comment on the reasoning behind not including further land within the allocation, as was included in the IIA provided with the Preferred Options</p>	<p>development as part of the plan preparation process and has demonstrated that it can meet its development requirements as set out in Policy S7. This approach accords with the evidence base and sets out a number of spatial strategy options which have been developed taking the site options into account along with other matters/ evidence. Outline reasons for the selection or rejection of spatial strategy options are set out in paras 6.4.47 to 6.4.53, which may make reference to an individual site options if they are key component of that spatial strategy option.</p> <p>No change to the IIA.</p>

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>consultation. This set out the following reason for why the wider part of the site has been discounted: The remaining non-allocated part and the southern parcel extend to the south. They are further away from the DSB and would not respect the existing settlement pattern of Ford End. The full site is greater than 1 hectare in size.</p> <p>3.12 The IIA has demonstrated that allocation of Land East of Pleshey Road, Ford End is in accordance with Pre-Submission Local Plan objectives and scores well in their assessment with beneficial impacts on housing supply and the sustainability of Ford End, whilst also not having any constraints associated with its deliverability (although this assessment is only considering 1 hectare of the site, we argue that this is applicable to the site as a whole). We therefore urge the Council to reconsider a larger allocation at Land East of Pleshey Road, Ford End.</p>	
<b>PSIIA-39</b>	Dandara	Para 6.4.40	<p>The evidence base supporting the draft Plan does not present convincing evidence to justify the decision to allocate Hammonds Farm in favour of other options West of Chelmsford that are better connected to existing services. The Integrated Impact Assessment suggests that housing growth at West Chelmsford was only considered in one of the six spatial strategy options tested. This was Option 2(c), where 3,000 dwellings would have been delivered at West and North-West Chelmsford (21SHELAA41; CFS165; CFS182 (Part); CFS82; CFS80; 21SHELAA100; 21SHELAA17; CFS183), including on Dandara's land. It suggests that this option was rejected because:</p> <ul style="list-style-type: none"> <li>• “Although adjacent to the Chelmsford Urban Area, the sites at West and North-West Chelmsford have poorer connectivity into the urban area of Chelmsford, and as such they are relatively isolated from the strategic highway network. There are less opportunities create sustainable routes to existing public transport or provide new Bus Based Rapid Transit infrastructure.</li> <li>• The sites that comprise the West and North-West Chelmsford site option are under multiple ownerships, which may delay delivery and result in piecemeal development Employment opportunities would be less accessible to the wider population (for</li> </ul>	<p>Disagreement with the analysis is noted; however there is no compelling evidence that Option 2c performs any better than the preferred allocations in respect of matters such as self-containment through mixed use development, relationship to established transport infrastructure and certainty of delivery.</p> <p>No change to the IIA.</p>



Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>example through public transport).” Para 6.4.51 2.31 Dandara disputes these findings, for the following reasons:</p> <ul style="list-style-type: none"> <li>• The sites cannot be considered to have poorer connectivity to the Chelmsford’s urban area. Not only are they more proximate to it, enabling genuine opportunities to walk or cycle to Chelmsford City Centre and access other services and facilities in its urban area, they are located directly adjacent to existing public transport routes and other infrastructure. This position is supported the Council’s own Sustainable Accessibility Mapping and Appraisal evidence base document 2022 (document T003), which scored eight potential development locations. The Edge of Chelmsford extension (which included West Chelmsford and East Chelmsford) scored fourth best. Only the brownfield development options in the urban area, North-East Chelmsford and South Woodham Ferrers scored better. Location 8, the Hammonds Farm option, scored second worst.</li> <li>• The ownership structure of the sites at West and North-West Chelmsford will not significantly impinge upon their delivery timeframes or risk piecemeal development. Dandara alone controls 81 hectares of land at North-West Chelmsford that can deliver a sustainable new neighbourhood of around 850 new homes. It could come forward in isolation, or as part of a wider allocation to include land to the south and south-west controlled by Taylor Wimpey and Crest Nicholson. All three developers are collaborating on the promotion of these sites, demonstrated by the submission of joint representations on the Plan (under separate cover) and a development option that includes delivery of an additional road link through the three sites between the A1060 and Chignal Road. Concerns about multiple land ownerships should not be a reason to discount growth at West and North-West Chelmsford.</li> <li>• The main employment opportunity proposed at Hammonds Farm is the separate employment site 16b, located adjacent to junction 18 of the A12. This could come forward without the wider residential-led allocation. In any case, whilst this location is accessible from the A12, it is poorly connected the population of Chelmsford’s urban area by anything other than car-based transport.</li> </ul> <p>The Council and the Inspector must consider the benefits of development at West and North- West Chelmsford more thoroughly</p>	



Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>before the Plan can be found sound. The soundness of the decision to allocate a new settlement away from Chelmsford's urban area ahead of any further allocations to the west of Chelmsford is particularly concerning given that a major allocation at West Chelmsford (Warren Farm) was found to be the preferred solution in the adopted Local Plan just five years ago. This decision was taken partly due to its proximity to the City Centre and the unique opportunity presented by this location to provide access to central Chelmsford (and other services to the west, such as Morrisons and other facilities at Newlands Spring and Melbourne) on foot or by bicycle. The Council should be prioritising active, sustainable travel over access to the strategic road network, otherwise it will simply end up with car-dependent, dispersed patterns of development. By contrast, incremental extensions to the West Chelmsford growth location would be entirely logical to maximise the opportunity to provide access to the city via active travel and ensure that new development is integrated with existing facilities and infrastructure.</p> <p>2.33 Further development here also presents opportunities to enhance the highway network and connections between the A1060 and Broomfield (relieving pressure on Chignal Road) alongside the delivery of public transport improvements and new park and ride facilities, as explained elsewhere. These opportunities must be fully explored before the Plan is finalised.</p>	
<b>PSIIA-40</b>	Crest Nicholson	6.4.9	<p>It is unclear if the Integrated Impact Assessment (IIA) which accompanies the Draft Local Plan (DLP) has appropriately considered the higher growth option that would meet the new Standard Method, despite acknowledging that it is a reasonable alternative.</p> <p>The IIA notes six spatial strategy options that were considered, but that it only considers the Site as part of a much larger growth in West Chelmsford, despite the availability of smaller sites to the west of Chelmsford to come forward either individually or as part of more strategic growth.</p> <p>4.5 The NPPF expressly notes that "Small and medium sized sites can make an important contribution to meeting the housing</p>	<p>As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that:</p> <ul style="list-style-type: none"> <li>- Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to</li> </ul>

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			<p>requirement of an area, and are often built-out relatively quickly” (paragraph 70).</p> <p>4.6 The exploration of potential spatial strategies, and the appraisal of options, should not be limited to those that entail large-scale strategic growth to the west of Chelmsford. It is notable that the criticisms and reasons given for the rejection of options that entail large-scale growth to the west of Chelmsford appear largely confined to the provision of employment land at Howe Green, which has been rolled into the option that includes West Chelmsford. In short, the IIA does not justify the rejection of the Site / West Chelmsford as it is required to do, bearing in mind the intended purposes of the IIA as per the NPPF and the requirements of the SEA Regulations.</p>	<p>which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.</p> <ul style="list-style-type: none"> <li>- An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”.</li> <li>- The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.”</li> </ul> <p>A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA.</p> <p>No change to the IIA.</p>
<b>PSIIA-35</b>	Obsidian Strategic Asset Management Ltd	Appendix K	<p>3.5.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies that are set out in local plans must be the subject of a Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan’s preparation, assessing the effects of the Local Plan’s proposals on sustainable development when judged against all reasonable alternatives.</p> <p>3.5.2 The Local Plan should ensure that the results of the SA</p>	<p>Disagreement with the analysis of the IIA is noted.</p> <p>The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process and has demonstrated that it can meet its development requirements as set out in Policy S7. This approach accords with the evidence base.</p> <p>As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and</p>

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>process clearly justify any policy choices that are ultimately made, including the proposed spatial strategy and site allocations (or any decision not to allocate sites) when considered against 'all reasonable alternatives'. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Council's decision making, and scoring should be robust, justified, and transparent.</p> <p>The Proposed Spatial Strategy draws on aspects of the five spatial options set out in the Issues and Options Consultation Document, which comprised: Approach A: Growing Existing Strategy; Approach B: Growth in Urban Areas; Approach C: Wider Strategy; Approach D: Growth Along Transport Corridors; Approach E: New Settlement.</p> <p>3.5.3 Although the proposed Spatial Strategy is a hybrid of Spatial Approaches A to E, it most resembles Spatial Approaches A and B by focusing development in and close to the Urban Areas and Key Service Settlements outside of the Green Belt, whilst providing for continued housing and employment land provision through the proposed allocation of a new garden community, and sites in the Chelmsford Urban Area.</p> <p>3.5.4 Approaches A and C include new allocations at larger villages, including Broomfield. We continue to disagree with the reasoning presented to support the rejection of Broomfield as a location for growth on the basis of employment and transport considerations.</p> <p>3.5.5 Appendix K provides an appraisal of the alternative spatial approaches. Under Assessment Objective 3 (Economy, Skills and Employment), Approach C is given an assessment score of Minor Positive. This is a lower grading than the other approaches. The reason given is: "Under this approach residential development would be more dispersed throughout the City Area and including at settlements without major employers and which are less accessible to the City Centre. In consequence, prospective residents in these</p>	<p>assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that:</p> <ul style="list-style-type: none"> <li>- Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.</li> <li>- An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan, is not a "reasonable alternative".</li> <li>- The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process."</li> </ul> <p>A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA.</p> <p>No change to the IIA.</p>

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			<p>settlements would be likely to have poorer accessibility to employment opportunities, notwithstanding the presence of some major employers in some locations, such as Broomfield.”</p> <p>3.5.6 The IIA does not provide a clear explanation as to why further growth in Broomfield should receive a lower score, considering that it is a Key Service Settlement which features the Council’s single largest employer, Broomfield Hospital.</p> <p>3.5.7 Similarly, under Assessment Objective 6 (Transport), Approaches A are C are both assessed as Minor Positive / Minor Negative. The negative being that directing a proportion of the City Area’s housing requirement to the smaller settlements could result in increased car use given the existing size of the settlements and the more limited range of services and jobs they provide.</p> <p>3.5.8 Again, this is considered to be a generalisation. Broomfield has the major services that would be expected of a regional centre, for example Broomfield Hospital as well as one of Chelmsford’s largest secondary schools. It is very well located for accessibility to Chelmsford, being described in the adopted Local Plan as a ‘quality’ bus corridor with a very good frequency of services connecting into Chelmsford City Centre. Indeed, the IIA recognises under Approach A that: “new development does present an opportunity to enhance the sustainability of these settlements by supporting investment in community facilities and services, developing their existing strengths which in some cases include key employers and good public transport infrastructure”.</p> <p>3.5.9 Opportunities for further development in Broomfield should not be discounted on the grounds that it performs poorly in employment and transport terms. As a result, we can conclude that the plan is not “justified” (NPPF, paragraph 36).</p>	
<b>PSIIA-43</b>	Brentwood Borough Council	General comment	Brentwood Borough Council (BBC) acknowledges the publication of the accompanying Pre-Submission Integrated Impact Assessment (IIA, 2025). BBC has no specific comments to make regarding the legal compliance of these documents or their conclusions.	Comment noted.

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
<b>PSIIA-13</b>	Wates Developments and Hammonds Estates LLP	Sustainability Appraisal	<p>As site promoter of Site 16a East Chelmsford Garden Community (Hammonds Farm) Wates Development and Hammonds Estates LLP support the evidence provided by the Council's IIA.</p> <p>As referenced in our representations on the Spatial Strategy, the selection of the Spatial Strategy set out in Policy S7 is underpinned by the Council's Sustainability Appraisal (part of the Integrated Impact Assessment), which as directed by Section 19(5) of the Planning and Compulsory Purchase Act 2004, has guided the selection and development of policies and proposals in terms of their potential social, environmental and economic effects. The IIA is a thorough study, making full assessment of policies and alternatives considered. This Sustainability Appraisal makes reference to the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment Regulations') and there is no reason to assume these are not fully met.</p> <p>The preparation of the Local Plan Review and the Spatial Strategy thus fulfils the NPPF Paragraph 32 requirements relating to sustainability appraisal, as well as the soundness test that requires a plan to demonstrate that it is an appropriate strategy, when considered against reasonable alternatives, to be considered justified. Our analysis of the authority's steps below in preparing the Spatial Strategy and assessing the effects of its policies, suggests that the Local Plan meets the NPPF tests of soundness:</p> <p>Consultation on a Scoping process for the SA has been carried out, and it provides responses to representations made at each stage.</p> <p>The I&amp;O stage SA assessed the five spatial approaches against the sustainability objectives, referring to the use of the council's evidence base.</p> <p>The Preferred Option stage SA tested the environmental effects of the selected Spatial Strategy, comparing these to effects from the alternatives tested at Issues and Options stage, and set out reasons for the selection of the Spatial Strategy. This indicated that the</p>	Comments and support for IIA noted.

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>Preferred Option was an evolved hybrid of the I&amp;O options based on further evidence work prepared.</p> <p>The Pre-Submission stage SA set out analysis of further variations to the Spatial Strategy, both in spatial terms by examining alternative locations for a large strategic scale development, as well as quantitative variations in the level of housing provision.</p> <p>We note the increase in the committed development position at North-East Chelmsford from 3,000 homes allocated in the adopted Local Plan, to 6,250 homes in the Local Plan Review due to the full quantum spanning plan periods receiving approval at masterplan stage and included in outline planning application proposals. This growth represents a significant expansion of North East Chelmsford during this plan period, and a change in the baseline since the Issues and Options consultation, so we read the progression of the options on this basis.</p> <p>The sites allocated in the Local Plan Review have been selected on the basis of appropriate evidence, noting the NPPF requirement for plan-making evidence to be “adequate and proportionate, focused tightly on supporting and justifying the policies concerned” (Paragraph 31). The site allocations are consistent with the Spatial Strategy, which we believe represents a logical approach to sustainable development by continuing the adopted Spatial Strategy. Our review of the successive stages of plan-making, including the preparation of an extensive evidence base and Integrated Impact Assessment that underpin it, suggest that the Spatial Strategy meets the NPPF tests of soundness and has had full regard to the legal requirements for plan-making.</p> <p>East Chelmsford Grden Community (Hammonds Farm) as a sustainable location.</p> <p>The Integrated Impact Assessment of Local Plan Review provides in our view a careful consideration of the sustainability issues associated with Strategic Growth Site 16a (Hammonds Farm), which is considered to deliver major benefits in comparison to an</p>	

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>aggregation of smaller-scale sites, and to outperform the other Reasonable Alternative options – as assessed in Table 6.5 of the IIA (p.183). We agree with this finding.</p> <p>Within Appendix G, the Appraisal of the Site Allocations assesses the following aspects of the site. We agree with the findings, and believe they underpin the Hammonds Farm site's clear credentials as a sustainable location:</p> <p>Significant positive effects recorded for Housing, Economy, Sustainable Living and Revitalisation and Health and Wellbeing, recognising the benefits the site's delivery of mixed land uses and the provision of community and green infrastructure, open space, health facilities, leisure facilities and walking/cycling links brings. This reflects the project vision and its focus on family and community success, safety and wellbeing, especially for women and girls.</p> <p>Significant positive and/or minor negative effects for Transport, reflecting the significant opportunities of the site to connect meaningfully to established infrastructure and embed sustainable modes of travel into everyday journeys and behaviours, whilst recognising the need to manage traffic through infrastructure mitigation.</p> <p>Potential effects on Cultural Heritage and Landscape and Townscape, which are acknowledged as being capable of being mitigated by policy requirements that can mitigate the landscape/visual and heritage impacts of the development.</p> <p>Potential effects on Water and Flood Risk due to the presence of water courses and Flood Zones 2 and 3, which again can be mitigated through design solutions, and are suitably controlled by specific masterplanning principles and policy requirements.</p> <p>Potential impacts on biodiversity, which again can be mitigated through policies requiring landscape buffers to the development edges and Local Wildlife sites.</p>	

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>We support the finding of the IIA that the location of Site 16a to the east of Chelmsford benefits from proximity to Chelmsford's rail infrastructure including the new Beaulieu Park station, and can utilise the East Chelmsford Green Wedge for active, multi-functional routes into Chelmsford. The site co-locates housing, employment, community infrastructure and amenities in a manner that encourages self-containment, high levels of accessibility and has opportunities for new sustainable transport provision and active travel connectivity, helping to avoid longer journeys by car. The location supports delivery of an onsite secondary school, as well as primary schools, and employment that will be accessible by public transport by the wider communities of East Chelmsford. It is therefore a sustainable location.</p> <p><b>Alternative Sites</b></p> <p>We agree with the IIA's narrative on the selection of the preferred approach, and the rejection of alternatives, and consider that this is well articulated in paragraphs 6.4.46 to 6.4.53 of the IIA. We agree that the Council's evidence base supports its findings that potential alternative development at Chatham Green, West and North West Chelmsford, and Howe Green and Rettendon Common would not achieve the same level of sustainability benefits as Hammonds Farm, especially in respect of Objective 4 (Sustainable Living and Revitalisation) and Objective 6 (Transport), due to their lower proximity to established sustainable infrastructure connections; limited opportunities to provide new public transport connections, and the relative isolation of employment opportunities provided, with consequent reliance on use of the private car.</p> <p>The Council would therefore miss an opportunity to secure the sustainability objectives set out in the Pre-Submission Local Plan. At this stage of testing, all of the Reasonable Alternatives / Spatial Strategy Options defined in the IIA benefit from the potential scale opportunities of a single strategic site, eg self-containment, co-location of housing, employment, community amenities and mixed communities. This appraisal therefore robustly tests a like-for-like</p>	



Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>situation, and the sites' respective geographical comparative advantages.</p> <p>The inclusion of Appendix M in the Reg 19 IIA offers an assessment of all SHELAA Sites: Methodology And Outputs ( IIA p.788), and this is helpful in demonstrating how all sites which are captured within the SHELAA have been subject to GIS analysis against the fourteen IIA Objectives, in addition to the many layers of evidence base that support the Local Plan and as a result it can be agreed that an equal appraisal of all proposal sites has been undertaken.</p> <p>The result of this appraisal finds clearly that the Pre-Submission Local Plan Review, including the Hammonds Farm site as Site 16a, is justified and supported by appropriate evidence.</p>	
<b>PSIIA-8</b>	National Trust	Appendix F Appraisal of development requirements & the proposed spatial strategy	<p>The National Trust supports a plan led approach to new development. We acknowledge the Spatial Strategy set out in the Pre-Submission Local Plan in order to meet an identified housing need. It is noted that East Chelmsford Garden Community (Hammonds Farm) is identified as a Strategic Growth Site for around 3,000 homes within the plan period and with capacity for a further 1,500 homes beyond 2041, along with infrastructure including an on-site new country park and significant new multi-functional green infrastructure.</p> <p>Strategic Growth Policy Site 13 Danbury is identified for 100 homes within the plan period.</p> <p>Blake's Wood and Lingwood Common (located to the north of Danbury) together with Danbury Common (located to the south of Danbury) are designated as Sites of Special Scientific Interest and are owned and managed by the National Trust. The sites are woodland areas with some visitor infrastructure. Taken as a whole the mosaic of habitats across Danbury Ridge including the National Trust sites, Essex Wildlife Trust Nature Reserves, and other land including ancient woodland and woodlands in private ownership not accessible to the public, is an important landscape for wildlife which is more than the sum of its parts.</p>	<p>Concerns relating to potential indirect impacts on SSSIs associated with the proposed developed at Hammonds Farm are noted.</p> <p>The IIA recognises that there is the potential for impacts on the SSSI and takes into account mitigation provided through policy development and Duty to Cooperate engagement between the Council and Natural England as evidenced in a Statement of Common Ground.</p> <p>Natural England has been a statutory consultee, throughout the plan preparation process, including the selection and refinement of proposed strategic allocations. Appropriate mitigation has been determined through the site allocation policy and wider supporting policies.</p> <p>No change to the IIA.</p>

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>We are concerned, that the new country park is proposed on the western part of Hammonds Farm, by the corresponding the proximity of the new residential areas to Danbury Ridge, and the eastern green links which will be made through to the wider landscape which could indirectly impact the SSSIs through cumulative recreational pressure without appropriate mitigation measures. New residential development in Danbury village would be in proximity to the Danbury SSSIs.</p> <p>Whilst Natural England assessed Danbury Common in 2018 as being at low risk of pressure from recreational disturbance, habitat impacts are apparent on site. There has been considerable growth in and around Chelmsford in the intervening years, the pandemic has changed how people interact with the outdoors, and further growth is due to take place across the plan period.</p> <p>The Integrated Impact Assessment (IIA007) high-level assessment of the plan states under the Biodiversity and geodiversity heading, consideration for several matters including Housing delivery, Spatial Strategy, and Policy S6 Housing and Employment Requirements there are unlikely to be direct effects on [designated sites] but that there could be indirect effects including from increased recreational activity. The scoring indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed in the colour used. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.</p> <p>The Trust welcomes the new Site masterplanning principle for Hammonds Farm to provide necessary mitigation to address the cumulative recreational pressure on SSSIs in proximity to the site, and for the Danbury sites to contribute towards addressing cumulative recreational pressure on the SSSIs. However, the Trust considers currently there is insufficient evidence to demonstrate the Plan would not have an adverse and unacceptable impact on SSSIs contrary to Paragraphs 187, 188 and 192 of the National Planning Policy Framework as set out below.</p> <p>We consider impacts on SSSIs and Ancient Woodlands should be</p>	

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>assessed at the Local Plan stage and scale, rather than for individual planning applications, so that cumulative impacts for the plan period can be adequately assessed and appropriate mitigation can be ensured.</p> <p>We would welcome discussion with the Council around recognising the Danbury Ridge area holistically, in order to ensure the new Local Plan can effectively preserve and enhance this landscape, whilst accommodating necessary growth and improving access to nature for its communities.</p>	
<b>PSIIA-2</b>	Martin Grant Homes	Section 6.4	<p>2.28. Para 6.4.11 of the Integrated Impact Assessment (IIA) states:</p> <p>In response to the consultation on the Preferred Options, the Council received approaches from Castle Point Borough Council and Southend on Sea City Council, and following the consultation, an approach from Basildon Borough Council, requesting that Chelmsford help to meet unmet housing need through its Local Plan allocations.</p> <p>2.29. No specific detail is provided as to what the level of need Chelmsford has been requested to accommodate, or any assessment as to the total level of unmet needs across the region. This should be established.</p> <p>On this basis, there is a scenario for the Plan seeking to deliver a housing requirement above minimum housing needs figure, subject to the provisions of Para 11 b).</p> <p>2.33. This growth scenario is not considered in the IIA, not being considered a reasonable alternative on the basis there is “no capacity in Chelmsford’s proposed Spatial Strategy to accommodate any unmet housing need from neighbouring or nearby local authorities”.</p> <p>2.34. The IIA considers a scenario of 1,406 dwellings per annum (which is below minimum housing needs under the December 2024 standard method) but assesses this on the basis of a particular selection of strategic-scale sites only. The scenario is discounted on the basis of these sites, rather than the quantum</p>	<p>The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process and has demonstrated that it can meet its development requirements as set out in Policy S7. This approach accords with the evidence base.</p> <p>As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that:</p> <ul style="list-style-type: none"> <li>- Reasonable alternatives does not include all possible alternatives: the use of the word “reasonable” clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.</li> <li>- An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”.</li> </ul>

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>of growth.</p> <p>2.35. There is likely a different make-up of sites forming a ‘high growth’ scenario which could result in a suitable spatial strategy which accommodates minimum housing needs and (if feasible) unmet needs. Against some of the strategic priorities, i.e. housing, investment, health and wellbeing, etc.. this could lead to gains above the Council’s preferred option.</p> <p>2.36. The discounting of a ‘high growth’ scenario based on consideration of one selection of sites only is not justified.</p> <p>2.37. Other suitable sites of a range of sizes have been identified through the Council’s evidence base which could, together, be a reasonable alternative spatial strategy to be tested as part of a ‘high growth’ scenario.</p> <p>2.38. Additionally, the conclusion of the IIA which state the high growth scenario would “perform more poorly overall” due to “uncertainty overall such as potential oversupply of housing in the plan period disrupting co-ordinated delivery against identified need”, are wholly unjustified. There is no evidence that achievement of the minimum housing need figure would have any “disruption” effect.</p> <p>2.39. Whilst the Plan benefits from the transitional arrangements of the NPPF 2024, this does not override the need for the Plan to be sound including “providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs”.</p> <p>As it stands, the Council has not justified its position as to why the higher growth scenario cannot be accommodated. The Council should be looking to achieve this where possible, and to discount this on the basis it could “disrupt” delivery is wholly flawed.</p>	<p>- The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.”</p> <p>A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA.</p> <p>As noted in the IIA analysis (p.190) whilst Option 3 would meet the full needs identified through the revised Standard Method (1,406 dwellings per annum) and is therefore also identified as having the potential for a long-term significant positive effect. The housing delivery rates over the past 10 years have been in the order of 1,000 dwellings per annum. Whilst the provision of a quantum of housing beyond the transitional need is likely to provide additional flexibility in delivery and choice of tenure, over-delivery could be disruptive to the local housing market with demand failing to match supply and potentially stalled developments. As a result, there is an element of uncertainty in relation to Option 3. Thus the identification of uncertainty reflects a reasonable concern that growth would disrupt the chosen plan approach in respect of transitional growth.</p> <p>No change to the IIA.</p>

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
PSIIA- 9	Vistry Group	Section 6.4.30	<p>3. Although tasked with providing an assessment of any reasonable alternatives, the IIA has not considered the opportunities that a Green Belt Review would present to deliver meet the Council's Strategic Priorities and deliver sustainable development in Chelmsford. In Section 6.4.30 of the IIA for the Pre-Submission Local Plan, when considering reasonable alternatives, WSP explain: "It was determined that site options which are situated within the Metropolitan Green Belt and Green Wedge would not be taken forward as part of any spatial strategy options to help meet any residual needs. This is primarily because there are sufficient and suitable site options outside of the Green Belt and Green Wedge to meet residual needs. The Government has continued to reaffirm the protection of the Green Belt in recent Ministerial Statements. The extent of the Green Belt is already established and the detailed Green Belt boundaries for Chelmsford were confirmed through the Council's Adopted Local Plan 2020. The Council is committed to protecting the Green Belt as it provides the strongest possible planning policy to prevent the encroachment of urban growth into open undeveloped areas and the coalescence of existing built-up areas. In accordance with the national planning policy outlined above, to vary the Green Belt boundaries would require exceptional circumstances which would need to be clearly evidenced"</p> <p>4. In response to previous representations on the IIA which highlight its deficiencies in not considering the reasonable alternative of a Green Belt Review, WSP state on page 297 of the IIA for the Pre-Submission Local Plan: "A Green Belt Review has not been completed as part of the Local Plan Review, reflecting the spatial principle of Protecting the Green Belt. The IIA considers spatial approaches which have been prepared as part of taking into account the spatial principle of not amending Green Belt boundaries as part of the Local Plan Review. Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected. In this context, the IIA has considered reasonable options (i.e. those which have been developed in light of available evidence,</p>	<p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected.</p> <p>The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process and can meet its development requirements without needing to undertake a Green Wedge review. This approach accords with the evidence base.</p> <p>No change to the IIA.</p>

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>spatial planning requirements and plan strategy). No change to the IIA.”</p> <p>5. On page 299, WSP add: “The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Preferred Options Consultation Document presents a range of sites at various spatial scales which are considered to be capable of meeting the identified development requirements.”</p> <p>6. Whilst we acknowledge that the existence of ‘exceptional circumstances’ is ultimately a policy matter down to the Council to determine, we disagree with WSP that is not necessary for the IIA to consider the reasonable alternative of a Green Belt Review. Rather than being guided by a “policy on” approach from the outset, the IIA should have been used as a tool to provide an objective view on whether a Green Belt Review would help the Council best meet its Strategic Priorities and deliver sustainable development in Chelmsford over the plan period.</p> <p>7. Vistry (and others) have highlighted the sustainability benefits of undertaking a Green Belt Review throughout the plan making process. A number of the benefits are presented in Vistry’s representations on Strategic Policies S1 and S7, but in summary include:</p> <ul style="list-style-type: none"> <li>• In the context of a housing crisis, providing must needed housing in parts of the administrative area that have not experienced any significant growth for a considerable period and, in locations such as Writtle, are experiencing population decline;</li> <li>• To allow more sustainable growth options in close proximity to the City Centre and large employment sites to the south of the City to come forward; and</li> <li>• To secure investment in infrastructure and local communities to the south-west of the City, notably developer led interventions to mitigate the risk of flooding in the City Centre.</li> </ul>	

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>8. The sustainability benefits of a Green Belt Review are multiple and substantial. In our view, the reasonable alternative of Green Belt Review was not a left field option that need not be assessed (as implied by WSP). As demonstrated by Vistry's representations on Strategic Policy S1, a significant number of other authorities who have similar proportions of Green Belt and non-Green Belt land have amended Green Belt boundaries as part of an appropriate strategy to secure the most sustainable pattern of development. A Green Belt Review should have been properly considered in Chelmsford from the outset and appropriately assessed through the IIA as part of the Local Plan preparation in order to demonstrate that the Plan is 'justified'.</p>	
<b>PSIIA-9</b>	Vistry Group	Section 6.4.30	<p>9. In addition to the above, we wish to highlight errors made in the Assessment of SHELAA Sites (Appendix M of the IIA) with respect to two sites promoted by Vistry; 21SHELAA97 (land south of Writtle), and 21SHELAA98 (land at Skeggs Farm).</p> <p>10. The assessment identifies that 21SHELAA98 is within 100m of a Local Nature Reserve (LNR) and the site is scored Red in this category. A review of Chelmsford City Council's Interactive Planning Policy Map confirms this is not the case. The nearest LNR is well beyond 800m and therefore the site should be reassessed as Green in this category.</p> <p>11. Both 21SHELAA97 and 21SHELAA98 have been assessed as Red for proximity to primary school; indicating that the nearest primary school is greater than 3.2km from the site. This is incorrect. Primary education in Writtle is covered by Infant and Junior Schools which are based on the same site. This school site is within 1km of both 21SHELAA97 and 21SHELAA98 and they should therefore be reassessed as Green.</p> <p>12. Both sites have been assessed as Red for distance to rivers (&lt;10m) and presence of flood zone 3. Whilst this may be correct, it is important to note that no development is proposed within flood</p>	Scoring suggestions noted which will be reviewed.

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			zones 2 and 3. The proposed site boundaries could have been drawn to exclude such zones, however a key benefit of the proposal is that opportunities have been identified to incorporate a range of natural flood management techniques to help address the risk of flooding to the City Centre.	
<b>PSIIA-49</b>	Natural England	General	<p>We agree with the Biodiversity and Green Infrastructure key sustainability issues although note that biodiversity net gain is mandatory for all developments (with certain exceptions) and will be mandatory for Nationally Significant Infrastructure Projects in November 2025 Biodiversity net gain - GOV.UK (<a href="http://www.gov.uk">www.gov.uk</a>). We agree with the Land Use, Geology and Soils key sustainability issues although note that previously developed land may have biodiversity (invertebrate) interest which needs to be taken into account by development. We agree with the Landscape and Townscape key sustainability issues.</p> <p>We support the criteria to test the plan's policies and proposals for negative impacts on European sites, SSSIs local sites, ancient woodland etc.</p> <p>We are happy with the criterion to conserve and enhance the Marine Conservation Zone under Objective 14. Landscape and Townscape. However, we suggest that the following wording is added to Objective 1. Biodiversity and Geodiversity: Will it preserve and enhance the local marine environment through the Blackwater, Crouch, Roach and Colne Estuary Marine Conservation Zone (MCZ)?'</p> <p>We note the conclusion that there are mixed positive and negative effects in respect of biodiversity and land use (section 8.2.8) and we agree that 'There will be pressures on biodiversity, land use, resource use and climate change, challenging policy and site-specific proposals to employ best practice sustainable measures' (section 8.2.9). We support the conclusion that 'The uncertainties and negative effects recorded emphasise the importance of the monitoring of the performance of sustainability indicators to help implement mitigation measures which would help improve the performance of all approaches, notably in respect of air quality,</p>	<p>Comments on and support for the IIA are noted.</p> <p>Suggestions for additional wording to Objective 1 are noted. However, the IIA has been subject to multiple rounds of consultation without suggestions of additional specificity for guide questions.</p> <p>No change to the IIA.</p>



Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			biodiversity, climate change and health and well-being' (section 8.2.11). We support the proposed IIA monitoring indicators for objectives 1, 7 and 14.	
<b>PSIIA-25</b>	Wates Developments Limited	6.4.25	<p>In our previous Regulation 18 submissions, we highlighted concerns in relation to the lack of an assessment of growth at Boreham as a spatial option and the general consistency of approach taken in relation to the SHELAA assessment of Site CFS 52. Wates are again disappointed, that the Sustainability Appraisal (SA) and the Integrated Impact Assessment (IIA) have continued to progress a spatial strategy which does not include any residential growth at Boreham, despite its status as a KSS and its proximity to other major residential and employment allocations, east of Chelmsford.</p> <p>Wates notes that an Integrated Impact Assessment (IIA) has been prepared, which has tested all 383 sites contained in the SHELAA against a range of individual assessment criteria. Whilst it is noted that the IIA has assessed a number of site proposals in Boreham, including Sites CFS 52 and CFS 145, these have all been tested on an individual basis and there has been no assessment of a wider strategy that includes Boreham as a growth location in principle. The question therefore remains as to why Boreham, as a Key Service Settlement (KSS), is ranked as a suitable and sustainable location for strategic employment growth, but is still excluded from further new housing growth, even when housing needs have materially increased under the new standard method.</p>	<p>Site options, including scales of development, were considered against SHELAA and IIA criteria. Boreham has not been selected to receive housing allocations as part of this Local Plan. However, there is one new employment site allocation (9a).</p> <p>No change to the IIA.</p>
<b>PSIIA-47</b>	Rochford District Council (RDC)	General comment	RDC acknowledges the publication of the accompanying Pre-Submission Integrated Impact Assessment (2025). RDC has no specific comments to make regarding the legal compliance of these documents or their conclusions.	<p>Comment noted.</p> <p>No change to the IIA.</p>
<b>PSIIA-55</b>	Hallam Land Management (HLM)	Reasonable Alternatives	5.1 HLM is supportive of the continued development and growth at Chelmsford Garden Community (draft Local Plan Policy SGS 6), with that development being led by Ptarmigan Land, Countryside,	Support for the IIA in respect of the Chelmsford Garden Community is noted.

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>L&amp;G and Halley Developments, as a continuation of previous delivery known as Beaulieu and Channels.</p> <p>5.2 Consistent with the spatial strategy of the draft Local Plan, but necessary to address matters of soundness identified above, there is opportunity for residential led development (in the order of 1,250 – 1,500 homes dwellings) on land to the north of Wheelers Hill (the Site). This would enable the further expansion of Chelmsford Garden Community with its proven:</p> <ul style="list-style-type: none"> <li>• achievability through effective working arrangements with a limited number of landowners – in this instance there would be a single landowner across the Site;</li> <li>• planning of significant infrastructure; and</li> <li>• positive sustainable effects across social, environmental and economic objectives.</li> </ul> <p>5.3 Where future residential development on the Site should be recognised, if not allocated in the draft Local Plan at this stage, then other modifications should be made to SGS Policy 6 (Chelmsford Garden Community) to (at the very least) require the masterplanning of the allocation to identify / highlight where future growth to the north of the Site should come forwards. To continue the sustainable principles of Chelmsford Garden Community, this area of future growth should be identified on the Key Diagram (Figure 14) and the 'Growth Area 2 – North Chelmsford' inset map (Figure 17) of the draft Local Plan.</p> <p>5.4 A Concept Strategy for the Site has been prepared by Hallam Land (Appendix B), which provides a general approach of how development on the Site could be arranged. This includes:</p> <ul style="list-style-type: none"> <li>• the continuation of built development beyond (to the north of) Wheelers Hill for 1,250 – 1,500 homes dwellings;</li> <li>• principal access to the Site via the new Northern Radial Distributor Road being delivered by committed development at Chelmsford Garden Community;</li> <li>• new local facilities – including local centre with retail and community uses, multimodal travel hub and pre- and primary school provision;</li> </ul>	<p>The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process and has demonstrated that it can meet its development requirements as set out in Policy S7. This approach accords with the evidence base.</p> <p>As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that:</p> <ul style="list-style-type: none"> <li>- Reasonable alternatives does not include all possible alternatives: the use of the word “reasonable” clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.</li> <li>- An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”.</li> <li>- The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.”</li> </ul> <p>A range of development quanta, broad distributions of development and site options available have been tested</p>

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			<ul style="list-style-type: none"> <li>• opportunity to route bus services through the centre of the Site;</li> <li>• a network of active travel links providing connections south to other part of Chelmsford Garden Community, west to Little Waltham and Broomfield, and east to connect to a wider public right of way network. This would allow for direct and quick access to Beaulieu railway station, park and ride facilities, and employment opportunities whether within Chelmsford Garden Community, Chelmsford itself or other towns and cities;</li> <li>• a substantial network of green infrastructure, integrated with other areas of Chelmsford Garden Community and the restoration of Sheepcotes Quarry to the north. This would provide significant leisure, recreation and sporting opportunities, as well as space for nature and a net gain in biodiversity.</li> </ul> <p>5.5 To the north of the Site, the Concept Strategy shows how natural landscape features including Sheepcotes Wood and Titelands Wood would robustly contain the built form / expanded area of growth in this more sensitive direction. To the east, development would be contained by the alignment and realisation of the CNEB.</p> <p>5.6 The Site is well-placed to coordinate with the four-stage delivery programme for the Chelmsford Garden Community, as set out in the Development Framework Document. This envisages the first stage of development being delivered by 2030 in the northern extent of the allocation that would see residential development, the Northern Radial Distributer Road, Channels Discovery Park and Sports Hub alongside education, healthcare and service provision.</p> <p>5.7 Despite the Council acknowledging in its Strategic Housing Employment Land Availability Assessment (SHELAA) that development on the Site is achievable, and where there is clear opportunity to provide new local services and expand bus services from the adjacent Chelmsford Garden Community, the Council has not considered the Site in the IIA as a reasonable alternative for development.</p> <p>5.8 Hallam Land however considers that had this process been carried out, it should have scored the Site highly against sustainable objectives, in a similar way to how draft Local Plan Policy SGS Policy 6 (allocating growth at Chelmsford garden</p>	<p>through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA.</p> <p>Options for development over the following plan period will be considered as part of the preparation of a new Local Plan.</p> <p>No change to the IIA.</p>

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>Community) has been assessed by the IIA, effectively as a 'sustainability appraisal' of the environmental, social and economic performance of the allocation. As presented at Table 1 (see attachment), many significant positive effects of development are identified, with weaker scoring including on loss of agricultural land, water usage and landscape considered unavoidable when having to provide for housing needs.</p> <p>5.9 Hallam Land considers the IIA to demonstrate the positive overall sustainability of strategic growth at Chelmsford Garden Community promoted by the draft Local Plan, consistent with the success the Council has had in delivering its initial phases. The IIA also justifies and reinforces the opportunity of the Site (of land north of Wheeler Hill) to expand that growth further, as highlighted by these representations above.</p>	
<b>PSIIA-54</b>	Miss Hanneke Redeker	Table 5.10 and Appendix G	<p>I feel the plan is unsound and object for the following reasons.</p> <p>1. The proposed access to the site (Barbrook Way) is not suitable for the type of construction vehicles that would be used. The road itself is in a state of disrepair with steel reinforcement rods exposed and the road itself is crumbling in many areas.</p> <p>The road itself is used by local children as a play area and this type of traffic would present a very dangerous situation.</p> <p>2. The traffic through the village is at an all time high with gridlock at times around the old Paul Bailey roundabout area. There has already been a serious accident in recent weeks with accidents in the vicinity of the former Paul Bailey site a daily occurrence.</p> <p>The roads around Bicknacre are dangerous at times with speeding drivers using the village as a rat run.</p> <p>The councils own Integrated Impact Assessment report carried out by WSP casts serious doubts on the proposed sites.</p> <p>My local MP John Whittingdale is strongly opposed to the development as is the Parish Council.</p> <p>The local doctors surgery (Wyncroft Surgery) is at full capacity and appointments are hard to come by and often require travel to South</p>	<p>Objection to Barbrook Way (Site 11c) is noted.</p> <p>The IIA Report assessed the option across a range of criteria, including potential traffic implications.</p> <p>The logic of the relationship between the options presented in the Issues and Options Document, the Preferred Options and the Pre-Submission Consultation Document is explained in the latter document, reflecting the availability of additional evidence base work and the consideration of the mix of spatial options which can meet housing and employment requirements.</p> <p>No change to the IIA.</p>

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			Woodham Ferrers.	
PSIIA- 30	Mr Alan Roche	General comment	<p>Failure to Provide Sufficient Evidence</p> <p>The legal compliance of the Local Plan is severely compromised by insufficient evidence regarding key elements, including transport infrastructure, economic justification, and heritage impact.</p> <p>Transport Infrastructure Concerns</p> <p>Chelmsford City Council's (CCC) Integrated Impact Assessment (p. 72) acknowledges that Pigeon Industrial Complex is located adjacent to already congested transport corridors: the A12 and A414. These roads are already under significant strain. However, the Local Plan provides no formal transport solutions or verified mitigation plans. The absence of a comprehensive transport strategy means that the additional traffic generated by the proposed expansion remains unaddressed. This omission directly contravenes NPPF Paragraph 32, which requires that transport impacts be adequately assessed before site allocations are made. The failure to engage with Essex County Council and National Highways for formal transport consultations further exacerbates this problem, violating the Duty to Cooperate as outlined in NPPF Paragraph 26. <i>[Integrated Impact Assessment, Chelmsford City Council, p. 72]</i></p>	<p>The role of the IIA is to present an assessment of likely effects and opportunities for their mitigation.</p> <p>Site- and topic-specific policies have been drafted to take account of the IIA where appropriate, aimed at helping to enhance their overall sustainability performance.</p> <p>Matters associated with potential traffic congestion are noted in the IIA, based on technical evidence available at the time of assessment and to be subject to further detailed scrutiny. Traffic issues are identified in the IIA as matters of concern.</p> <p>Transport is recorded as a Significant Positive/Minor Negative, reflecting traffic generation but the requirement of the site-specific policy is for measures to enable travel by sustainable modes (including walking and cycling) and improvements to the local road network (supported by a traffic management strategy).</p> <p>No change to the IIA.</p>
PSIIA- 29	Mr Alan Roche	General comment	<p>Failure to Provide Sufficient Evidence</p> <p>The legal compliance of the Local Plan is compromised due to insufficient evidence supporting the allocation of Hammonds Farm. Chelmsford City Council (CCC) has failed to adequately substantiate key elements, especially regarding transport infrastructure, flood risk, and heritage impact.</p> <p>According to CCC's own documents, such as the Integrated Impact Assessment (p. 72), there is an acknowledgment of traffic congestion along the A414 and A12, but no formal transport strategy has been provided to demonstrate how these issues will be addressed. This is a critical issue because the NPPF (Paragraph 32) requires that all transport impacts be appropriately</p>	<p>Matters associated with potential flood risk and traffic congestion are noted in the IIA, based on technical evidence available at the time of assessment and to be subject to further detailed scrutiny. Flood risk and traffic issues are identified in the IIA as matters of concern.</p> <p>Transport is recorded as a Significant Positive/Minor Negative, reflecting traffic generation but the requirement of the site-specific policy is for measures to enable travel by sustainable modes (including walking and cycling) and improvements to the local road network (supported by a traffic management strategy).</p>

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			<p>considered in plans. This requirement is essential for positively preparing a plan that ensures effective delivery of infrastructure. The lack of such a strategy directly violates the legal standard for soundness as laid out in NPPF Paragraph 35. <i>[Integrated Impact Assessment, Chelmsford City Council, p. 72]</i></p> <p>The flood risk at Hammonds Farm is also acknowledged in the Chelmsford Level 1 SFRA (p. 112), yet CCC has not provided sufficient evidence that these risks have been mitigated or adequately assessed. Natural England was not consulted on this, and flood mitigation strategies have not been presented in a way that complies with the Sequential and Exception Tests under NPPF (Paragraphs 160-165). The lack of a detailed flood risk assessment represents a serious gap in the evidence base of the Local Plan, further undermining its compliance with national planning policy and casting doubt on the soundness of the plan. <i>[Chelmsford Level 1 SFRA, Chelmsford City Council, p. 112]</i></p> <p>Additionally, the Heritage Assessment for Hammonds Farm (2024, p. 4) highlights significant concerns about the impact on heritage assets, yet CCC has not demonstrated how these concerns will be mitigated, failing to consult Historic England adequately. As required by NPPF Paragraph 189, heritage impact assessments must demonstrate how proposals conserve and enhance heritage assets, which CCC has failed to do for Hammonds Farm. <i>[Heritage Assessment for Hammonds Farm, 2024, p. 4]</i></p>	<p>The Council's assessment of the proposed allocation states: <i>"The site will accommodate a new Garden Community for housing and employment development, a country park, areas for SUDS, biodiversity and recreation, and provide active and sustainable modes of transport to key destinations. Complies well with Strategic Priorities, Vision, Spatial Principles and Spatial Strategy in particular by providing a mixed and balanced new self-contained community. Supported by the Plan evidence base e.g. Heritage Assessment 2024. There are no overriding constraints that would hinder the delivery of the site which will significantly contribute to housing and employment supply. It is viable and available with no overriding physical constraints to bringing forward the allocation in this location."</i> STRATEGIC GROWTH SITE POLICY 16a – EAST CHELMSFORDGARDEN COMMUNITY (HAMMONDS FARM) sets out in detail a range of mitigation measures covering movement and access to and within the proposed allocation, along with the historic and natural environment.</p> <p>The Environment Agency, Natural England and Historic England are all statutory consultees on the plan preparation process and have made various representations on the Local Plan and the IIA.</p> <p>No change to the IIA.</p>
PSIIA-21	Weal Properties Ltd	Para 6.4.14	<p>Spatial Strategy Options and the Green Wedge</p> <p>The Integrated Impact Assessment (IIA) acknowledges that to meet residential and employment needs under transitional and higher growth levels, additional site options beyond the existing Local Plan allocations will be required (paragraph 6.4.29).</p> <p>The IIA confirms that site options within the Metropolitan Green Belt and Green Wedge would not be considered as part of the spatial options to meet residual needs. This, it explains, is primarily because there are sufficient and suitable site options available</p>	<p>Comments of support are noted.</p> <p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected.</p>



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			<p>outside of these areas in order to meet the proposed development requirements. However, meeting development needs is not simply about fulfilling housing numbers to accommodate future growth in purely numerical terms — it is incumbent upon the plan-making process to ensure the Local Plan will do so in a sustainable manner. Case law (e.g. Calverton) confirms that a key factor in determining whether there are exceptional circumstances which justify alterations to the Green Belt is whether it is possible to meet development needs sustainably without doing so.</p> <p>The IIA suggests that residual housing needs can be met without using sites within the Green Wedge. However, it also notes that Chelmsford City Council has received requests from Castle Point Borough Council, Southend-on-Sea City Council, and Basildon Borough Council to help meet their unmet housing needs through Chelmsford's Local Plan allocations (paragraph 6.4.11). The IIA further states that Chelmsford's proposed Spatial Strategy has no capacity to accommodate unmet housing needs from neighbouring authorities (paragraph 6.4.14). Therefore, it would be logical and appropriate to test spatial options involving the release of land from the Green Wedge to help address this shortfall. As acknowledged in paragraph 6.4.15, even providing the full standard method assessment of 1,454 homes per annum would create capacity for some neighbouring unmet need — a scenario based on a spatial option that does not release land for housing from the Green Wedge.</p> <p>The IIA has therefore failed to test all reasonable alternatives. Discounting all sites within the Green Wedge without properly assessing them as reasonable alternatives makes the proposed Spatial Strategy unjustified and unsound.</p>	<p>The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process and can meet its development requirements without needing to undertake a Green Wedge review. This approach accords with the evidence base.</p> <p>The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Pre-Submission Consultation Document presents a range of sites at various spatial scales which are considered to be capable of meeting the identified development requirements.</p> <p>As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that:</p> <ul style="list-style-type: none"> <li>- Reasonable alternatives does not include all possible alternatives: the use of the word “reasonable” clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.</li> <li>- An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”.</li> <li>- The question of whether an option will achieve the objectives is also essentially a matter for the evaluative</li> </ul>

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				<p>judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.”</p> <p>No change to the IIA.</p>
<b>PSIIA-37</b>	Mr Albert Clarke	Site 11b	<p>I feel the plan is unsound and object for the following reasons.</p> <p>Below is taken from the councils own Integrated Impact Assessment Plan undertaken by WSP.</p> <p>Bicknacre 21SHELAA94</p> <p>The development would result in backland development to the north of the village. When compared to the preferred sites this site compares less well with the Spatial principles and Spatial Strategy in particular by not respecting the pattern of the existing settlement of Bicknacre. It would also have poorer access and connectivity to services and facilities available in Bicknacre Village.</p>	<p>Objection to the Growth Site 11b at Bicknacre is noted.</p> <p>The IIA Report assessed the option across a range of criteria, including accessibility and connectivity to services (21SHELAA49).</p> <p>The logic of the relationship between the options presented in the Issues and Options Document, the Preferred Options Document and the Pre-Submission Document is explained in the latter document, reflecting the availability of additional evidence base work and the consideration of the mix of spatial options which can meet housing and employment requirements.</p> <p>No change to the IIA.</p>
<b>PSIIA-36</b>	Mr Albert Clarke	Site 11c	<p>I feel the plan is unsound and object for the following reasons</p> <p>Below is taken from the councils own Integrated Impact Assessment Plan undertaken by WSP and clearly indicates the site is unsuitable.</p> <p>BICKNACRE CFS158</p> <p>When compared to the preferred sites this site compares less well with the special principles and Special strategy in particular by not respecting the pattern of the existing settlement of Bicknacre. This site would result in more isolated development in the countryside. It would also have poorer access and connectivity to services and facilities available in Bicknacre Village.</p>	<p>Objection to Growth Site 11c at Bicknacre is noted.</p> <p>The IIA Report assessed the option across a range of criteria, including accessibility and connectivity to services.</p> <p>The logic of the relationship between the options presented in the Issues and Options Document, the Preferred Options Document and the Pre-Submission Document is explained in the latter document, reflecting the availability of additional evidence base work and the consideration of the mix of spatial options which can meet housing and employment requirements.</p>



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				No change to the IIA.
<b>PSIIA-41</b>	Mr Ivan Conner	Appendix G	<p>I agree with the comments next to Bicknacre CFS158, which I understand relates to this site, in Appendix G - Appraisal of Proposed Site Allocations and Reasonable Alternatives on page 495.</p> <p>The site (Site 11c) should be removed from the plan.</p>	<p>Objection to Growth Site 11c at Bicknacre is noted.</p> <p>The IIA Report assessed the option across a range of criteria, including accessibility and connectivity to services.</p> <p>The logic of the relationship between the options presented in the Issues and Options Document, the Preferred Options Document and the Pre-Submission Document is explained in the latter document, reflecting the availability of additional evidence base work and the consideration of the mix of spatial options which can meet housing and employment requirements.</p> <p>No change to the IIA.</p>
<b>PSIIA-38</b>	This Land Limited	Appendix D	<p>The Integrated Impact Assessment (IIA), acknowledges that as a Key Service Settlement they have access to a good range of facilities and are located on important public transport corridors. These services may include primary schools, local employment opportunities, shops, community facilities, good public transport links, surgeries and green spaces.</p> <p>The IIA continues that the station and Boreham Interchange will create an important transport hub, which in turn will help stimulate investment and development in the area.</p> <p>Appendix D of the IIA confirms Boreham's key characteristics. However, in summary the village of Boreham has a population of approximately 4,000 people and is well served by local services and facilities. The village benefits from a primary school, village hall (and village green), a church, doctor's surgery, Co-op foodstore, 3 pubs and a parade of shops that include a post office. The village is well served by public transport, with various bus services that run along Main Road between Chelmsford, Witham, Colchester and Maldon. There are also services that loop around the village via Plantation Road / Church Road.</p>	<p>Comments on assessing all reasonable alternatives are noted.</p> <p>The IIA appraises the Local Plan Review from Issues &amp; Options Stage through to Submission. The Local Plan Review contains reasonable alternatives as spatial, site and policy options.</p> <p>The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Pre-Submission Consultation Document presents a suite of sites which are considered to be capable of meeting the identified development requirements, along with reasonable alternatives.</p> <p>As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area.</p>

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>To make the plan sound, the Council must reconsider its approach to the spatial strategy and the settlement hierarchy, in particular Boreham's housing growth within the spatial strategy. The lack of growth proposed for the Key Service Settlement suggests the spatial strategy is already failing, in distributing growth across the City Area. A growth target for Boreham should be ambitious to reflect the strategic housing requirement and Boreham's sustainable status as a Key Service Settlement. This will ensure that Boreham's growth is not artificially constrained and that it makes a contribution (not just an appropriate contribution) to Chelmsford's housing supply over the extended plan period. The IIA must also be updated to test growth scenarios for Boreham, ensuring all reasonable alternatives are fully assessed. Without this, the Local Plan risks being found unsound at examination and requiring significant modification.</p>	<p>Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that:</p> <ul style="list-style-type: none"> <li>- Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.</li> <li>- An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan, is not a "reasonable alternative".</li> <li>- The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process."</li> </ul> <p>A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA.</p> <p>No change to the IIA.</p>
<b>PSIIA-51</b>	Environment Agency	Section 3.8	Water Quality	Comment noted.

Ref- erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			<p>We are generally satisfied with the Integrated Impact Assessment section 3.8, Water. We are pleased to see there was a 2024 update to the Chelmsford Water Cycle Study. Section 3.8.9 covers the serving Water Recycling Centre (WRC) and their current capacity. We are pleased to see identification of required upgrades and revised quality permit conditions, and phasing where necessary. We would encourage communication with Anglian Water about planned upgrades, especially within the AMP8 programme (2025-2030), and reviewing their Drainage and Waste Water Management Plan (DWMP).</p>	No change to the IIA.
<b>PSIIA-53</b>	Gladman Developments Ltd	Reasonable Alternatives	<p>Gladman contend that the IIA currently fails to meet the requirements of National Policy Guidance, the 2004 Regulations and the Directive and as a result the Chelmsford Local Plan Review cannot therefore be considered an appropriate strategy for the purposes of NPPF Paragraph 36. The reasons for this view will be discussed below.</p> <p>Assessment of Reasonable Alternatives</p> <p>The assessment of reasonable alternatives has not been achieved in three ways:</p> <ul style="list-style-type: none"> <li>- Failure to sufficiently test alternative growth scenarios</li> <li>- Failure to sufficiently test alternative employment needs</li> <li>- Failure to accurately and consistently test spatial options</li> </ul> <p>Failure to test sufficient alternative growth scenarios</p> <p>The IIA has failed to test sufficiently alternative housing requirements in isolation, instead opting to test one single housing requirement of 1,240 .in order to meet the transitional arrangements. Table 5.2 outlines how this requirement performs against the assessment objectives to conclude that this requirement is suitable.</p> <p>Notwithstanding the lack of justification for pursuing this figure beyond it being 80% of the new standard method figure, to not test lower or higher growth scenarios is incorrect.</p> <p>Table 6.3 outlines the spatial strategy options and provides the total</p>	<p>Comments on exploring higher growth scenarios and testing alternative requirements in isolation are noted.</p> <p>The IIA appraises the Local Plan Review from Issues &amp; Options Stage through to Submission. The Local Plan Review contains reasonable alternatives as spatial, site and policy options.</p> <p>The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Pre-Submission Consultation Document presents a suite of sites which are considered to be capable of meeting the identified development requirements, along with reasonable alternatives.</p> <p>As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT</p>

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			<p>number of dwellings each option could provide. Gladman consider this incorrect and the housing requirements should be tested in isolation, and not as part of the spatial strategy options.</p> <p>Rather, the IIA should have explored three growth options in isolation of the spatial strategy (as a minimum); the previous standard method figure of 913 (should the Council be pursuing examination under NPPF 2023), the proposed figure of 1,210 (with appropriate justification for the uplift) or the emerging standard method figure of 1,454. Failure to do so results in the housing requirement being unjustified and undermines the IIA as a whole. Based on this, Gladman do not consider that the legal requirement has been met.</p> <p>Failure to test alternative employment needs</p> <p>As above, rather than suitably testing a low, medium and high employment needs scenario as a minimum and in isolation, the IIA has tested just one scenario in full.</p> <p>Rather than being incorporated as part of the spatial strategy options, Gladman consider that these alternatives must also be tested in isolation to ensure that the most sustainable option has been progressed.</p> <p>Failure to accurately and consistently test spatial options</p> <p>Gladman do not consider that sufficient assessment of the reasonable alternatives to the Hammonds Farm site have been considered therefore, there is not sufficient evidence to suggest that this is the most sustainable option when compared with other large scale strategic sites available in the area.</p> <p>Had further work been undertaken, Gladman contend that it would be likely evident that the Hammonds Farm allocation would not represent the most reasonable approach.</p> <p>The five spatial strategies that were then rolled forward in to 5 low, transition, high scenarios with limited differentiation between the sites included. Recognising that there would be a large number of potentially hybrid strategies an element of planning judgement therefore needs to be applied, Gladman contend that the hybrid</p>	<p>Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that:</p> <ul style="list-style-type: none"> <li>- Reasonable alternatives does not include all possible alternatives: the use of the word “reasonable” clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.</li> <li>- An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”.</li> <li>- The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.”</li> </ul> <p>A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA.</p> <p>No change to IIA.</p>

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			<p>strategies should be revisited, and the exercise undertaken again.</p> <p>We would suggest an alternative strategy to Hammonds Farm as strategic growth at Boreham, Howe Green, East Hanningfield, Rettendon, Bicknacre and Danbury.</p> <p>Assessment of such a hybrid strategy should be afforded the same flexibility in terms as mitigation as that of the Hammonds Farm option. As for example, the current hybrid strategy discounts sites for highways capacity or relative isolation yet these are the exact issues that Hammonds Farm will have to address. Development of sites in these locations would provide the infrastructure required, flexibility afforded to the assessment of Hammonds Farm but in a more dispersed way so that there is less reliance on any one location to deliver the future housing growth of the Local Plan Review.</p> <p>There is also a lack of testing in terms of higher growth scenarios to accommodate unmet needs from neighbouring authorities, this is crucial in determining whether the duty to cooperate has been fulfilled and whether the Council have done enough to prove that they cannot assist neighbours.</p>	
<b>PSIIA-48</b>	Dandara Eastern	Section 6	<p>The approach taken by the council in order to meet the housing needs in the 2024 NPPF is set out in Section 6 of the Integrated Impact Assessment (IAA). It appears to acknowledge that planning to meet this higher growth figure is as reasonable alternative at paragraph 6.4.9 where it states:</p> <p>“Based on the evidence set out above, it is considered reasonable to explore alternatives for the following levels of housing growth:</p> <ul style="list-style-type: none"> <li>• Lower growth (approx. 955 dpa or 18,145 total dwellings) based on the Strategic Housing Needs Assessment (SHNA) published in 2023 and previous Standard Method. While it could be argued that this is not a reasonable alternative as it is not in line with the revised NPPF and Standard Method, it is being taking forward for further consideration as a number of representations were received from the public on the Preferred Strategy questioning the level of growth proposed in the plan.</li> <li>• Transitional growth (approx. 1,206 dpa or 22,990 total dwellings)</li> </ul>	<p>The Local Plan Review contains reasonable alternatives as spatial, site and policy options.</p> <p>The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Pre-Submission Consultation Document presents a suite of sites which are considered to be capable of meeting the identified development requirements, along with reasonable alternatives.</p> <p>As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options</p>

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			<p>based on the housing need identified through the revised Standard Method and transitional arrangements.</p> <p>• Higher growth (approx. 1,406 dpa or 26,714 dwellings) based on the full housing need identified through the revised Standard Method published for consultation in September 2024. The higher level of growth proposed through the December 2024 NPPF and Standard Method has not been considered further at this stage as it was not available in sufficient time for consideration through this report.” (Emphasis added).</p> <p>The emphasised text above appears to confirm that the housing requirement generated by the 2024 NPPF and its accompanying Standard Method is a reasonable alternative, but at the same time admit it has not been assessed.</p> <p>Notwithstanding the above and the commentary within the IIA at paragraph 6.4.9., we note that the IIA has assessed a higher growth scenario, albeit in the context of options for the spatial strategy, Spatial Strategy Option 3.</p>	<p>considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that:</p> <ul style="list-style-type: none"> <li>- Reasonable alternatives does not include all possible alternatives: the use of the word “reasonable” clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.</li> <li>- An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”.</li> <li>- The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.”</li> </ul> <p>A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA.</p> <p>No change to IIA.</p>
<b>PSIIA-45</b>	Mrs Joanne Britter	Appendix G and M	I believe that the site is not legally compliant and it is unsound because it goes against the Integrated Impact Assessment produced for the Local Plan Review.	The objection to Growth Site 11c at Bicknacre is noted.

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			<ul style="list-style-type: none"> <li>• Please refer to page 495, Appendix G - Appraisal of Proposed Site Allocation and Reasonable Alternatives. The findings list that the site complies less well with the Spatial Principles and Spatial Strategy.</li> <li>• Please refer to page 851, Appendix M - Assessment of SHELAA Sites: Mythology and Outputs. The site NLUD REFERENCE CFS158, OBJECTID 379 has been listed as 'green' for distance to a secondary school. The nearest school is approximately 7.5km away and although there is a school bus within 1km of the proposed site, it is not free to all the village and seats are limited. Therefore, I feel that the measurement of 'green' is unsound and does not convey the entire situation.</li> <li>• Please refer to pages 860 and 872, Appendix M - Assessment of SHELAA Sites: Mythology and Outputs. The same site mentioned above (379) is listed 'green' for Presence of Flood Zone and Presence of Flood Risk Area, yet a site which is just one road away OBJECTID 150, NLUD REFERENCE 15SLAA43 is listed as 'amber' for the presence of Flood Zone. Even if the data has come from a government website I do feel that a full assessment of site CFS158 is required.</li> </ul> <p>I therefore respectfully request that this site be removed from the Local Plan since there are many discrepancies in both the Integrated Impact Assessment paperwork and the SHELAA document which are outlined in one of my other objection emails.</p>	<p>The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The discounting of options at an early stage based on available evidence is a Council-led process.</p> <p>The Pre-Submission Local Plan presents a range of sites at various spatial scales which are considered to be capable of best meeting the identified development requirements.</p> <p>No change to the IIA.</p>
<b>PSIIA-46</b>	Mrs Joanne Britter	Table NTS1	<p>The inclusion of the above site is unsound because the Integrated Impact Assessment document produced by WSP has some very confusing criteria and key but if my understanding of the document is correct then I believe some of the statistics are wrong.</p> <p>Assessment Objective 1 - Biodiversity already shows that the site is uncertain for fostering growth and investment and providing new jobs. I do not see how 20 houses will foster investment and provide new growth other than in the short term when it provides some work for the building contractors.</p> <p>Assessment Objective 3 - Economy has a neutral score of 0.</p>	<p>The objection to Growth Site 11c at Bicknacre is noted.</p> <p>The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The discounting of options at an early stage based on available evidence is a Council-led process.</p> <p>The Pre-Submission Local Plan presents a range of sites at various spatial scales which are considered to be capable of best meeting the identified development requirements.</p>



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			<p>According to the matrix and the key it means it is neutral for promoting smart active travel and sustainable transport. I consider that the site is actually incompatible for this objective.</p> <p>Assessment Objective 6 has a transport scoring of ? Which means uncertain. I believe again that this scoring should be incompatible as the site does not reduce the need for travel or promote more sustainable modes of transport.</p> <p>Assessment Objectives 8, 9 and 10 have all scored a 0 which again means neutral. The flood risk is certainly not neutral. There is already flooding in the fields ,neighbouring gardens which is leading to subsidence of some properties. This is certainly not neutral.</p> <p>Assessment Objectives 11 and 14 already highlight that the proposed building on this piece of land is incompatible with cultural heritage and landscaping. I agree with these points.</p> <p>With the above assessment of objectives 13 and 14, along with what I consider errors with the other assessment objectives I politely ask that the above site be removed from the local plan.</p>	No change to the IIA.
<b>PSIIA-23</b>	Mrs R Armstrong and Mr B Howard, Ms Becky Armstrong	Para 6.4.11	<p>Utilising a settlement hierarchy to guide the distribution of development within the administrative area is deemed a logical and conventional approach, which has been successfully employed in the preparation of numerous sound Local Plans in recent years. This method can be a valuable tool for ensuring sustainable distribution of development, although it is crucial that its application to policies and allocation should not be overly simplistic and should account for broader sustainability considerations.</p> <p>We support the designation of Roxwell as a Service Settlement. Service Settlements have more limited services and facilities but typically include primary schools, convenience shopping facilities and community facilities making them suitable for a more limited scale of development.</p> <p>Although we agree with the use of a settlement hierarchy to inform decisions regarding the scale of growth directed to various settlements within the borough, the current wording of the policy text makes it unclear how the settlement hierarchy outlined in</p>	<p>Comments on re-wording of Strategic Policy 7 are noted.</p> <p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected.</p> <p>No change to IIA.</p>



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			<p>Strategic Policy S7 is to be utilized by decision-makers.</p> <p>The IIA has therefore failed to test all reasonable alternatives. Discounting all sites within the Green Belt without properly assessing them as reasonable alternatives makes the proposed Spatial Strategy unjustified and unsound.</p>	
<b>PSIIA-22</b>	Ms Katherine Jennings	Site 16a	<p>With respect to the allocation of land at East of Chelmsford - Hammonds Farm (Site 16a) I strongly object to this strategic allocation. The concentration of the majority of the housing allocated in this area has not been fully or fairly examined against other more spatial options adding to the Chelmsford City boundary within the Green Belt and to existing towns and villages including those within the Green Belt. It creates a dispersed settlement that is not cohesive with the existing city settlement or surrounding settlements.</p> <p>This site was considered under the previous local plan process leading to the adoption of the 2020 Local Plan. This site was at that time discounted in favour of alternative sites to the north and west of Chelmsford which the Council considered exhibited better performance in respect of landscape, historic environment, flood risk, traffic generation and local road congestion. It is considered that the Council have not provided any justification to make a departure from the above consideration in the previous IAA. In particular the evidence in relation to traffic assessments is poor as significant investment is required to make this site sustainable given it is remote from the city centre and existing transport links. The evidence provided in relation to the capacity of the Boreham Interchange which will be subject to Hammonds Farm traffic accessing services and importantly the new rail station at Beaulieu has not been fully considered. This site does not provide sustainable links to the city centre being separated by a main trunk road.</p> <p>The landscape along the river valley and surrounding the village of Danbury and Little Baddow is exceptional. It was acknowledged previously that this area has a high value landscape but there has</p>	<p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected.</p> <p>The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Pre-Submission Consultation Document presents a suite of sites which are considered to be capable of meeting the identified development requirements, along with reasonable alternatives.</p> <p>As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that:</p> <ul style="list-style-type: none"> <li>- Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority,</li> </ul>

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			<p>been no justification as to why this is no longer considered a constraint to development in this location. The SA remains quite quiet on the shift from this site being unsuitable in landscape terms to now being a preferred option. The loss of tranquility within this river valley will be hugely detrimental and cannot be justified. Furthermore, there is considerable loss of high valuable and productive agricultural land in this location which is contrary to planning policy.</p> <p>I consider that the Council have not fully examined all possible alternatives having set their mind to a large-scale allocations north and east of Chelmsford. This allocation is unjustified, unlikely to be effective in delivery and it is not compliant with planning policy.</p>	<p>subject to challenge only on conventional public law grounds.</p> <ul style="list-style-type: none"> <li>- An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”.</li> <li>- The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.”</li> </ul> <p>A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA.</p> <p>No change to IIA.</p>
<b>PSIIA-42</b>	Saxtons 4x4	1.4.9	<p>The Pre-Submission Integrated Impact Assessment (IIA) was last updated May 2024. Para 1.4.9 of the 2024 IIA confirms that “Development sites will be allocated to accommodate a minimum of 162,646 sqm of new employment business floorspace (Use Classes E(g)(i-iii), B2 and-B8) in addition to existing commitments over the Plan period”. It also confirms the spatial use of the area in a key diagram of its proposed spatial strategy, which is also Figure 14 of the 2025 Pre-Submission Plan (see below).</p> <p>The IIA confirms that despite the settlement hierarchy of the plan, of the 162,000 sqm needed for employment space only 9,000sqm of employment floorspace is to be provided in 2 locations at Maldon Way(4k) and 5k at previously developed sites in the urban</p>	<p>The Pre-Submission Local Plan proposes a continuation of the existing approach to employment land provision, i.e. a flexible rolling employment land supply across the plan period to 2041 using a combination of existing and new sites to achieve this.</p> <p>A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and</p>

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			<p>Chelmsford urban area. We believe that additional suitable and available sites could increase this supply, better aligning with the spatial strategy.</p> <p>The IIA cites various evidence base documents including the councils own economic strategy, and Employment Land Review and Annual Monitoring Reports, that will need to ensure that future growth of Chelmsford's economy will be dependent upon "the provision of high-quality development opportunities, including high quality office space and industrial unit space, in order to attract new investors". Indeed 2 of the key sustainable objectives of the IIA are also cited as</p> <ul style="list-style-type: none"> <li>a) The need to deliver a range of employment sites to support economic growth.</li> <li>b) The need to ensure a flexible supply of land for employment development.</li> </ul> <p>In regard to traffic flows and in/out commuting, the evidence base also states that there is "a significant outflow of commuters from the Chelmsford City Area alongside a significant inflow. In 2011, a total of 30,605 workers commuted into Chelmsford from other local authorities whilst 34,430 residents commuted out of Chelmsford. This represents a net outflow of 3,825 workers." With sustainable transport movements being a priority for the council we believe that all opportunities to retain and provide employment within the locale of the existing employment centres should be maximised.</p> <p>We would also note that the IIA does not seem to SA test alternative options to the employment allocations, or a "extend existing employment areas" options for assessment and we would seek confirmation that this has been undertaken. We therefore consider the plan to not be consistent with national policy and not positively prepared.</p> <p>To summarise regarding employment, the Local Plan in principle fails to demonstrate a fully justified approach in regard to employment policies supporting the need for employment space and protecting existing spaces. We are concerned that the Local Plan does not go far enough and therefore has not been positively prepared in clearly</p>	<p>rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA.</p> <p>No change to the IIA.</p>

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			setting out a strategic strategy for the pattern, scale and design quality of spaces to make sufficient provision for employment, in line with the NPPF para. 20.	
<b>PSIIA-33</b>	Strutt and Parker (Farms) Limited (SPFL)	6.4.40	<p>The latest IIA (January 2025) identifies the key sustainability issues for the Pre-Submission Local Plan, which fed into a framework against which proposals are assessed. It covers the potential environmental, social, economic and health performance of the Local Plan and any reasonable alternatives.</p> <p>6.10 The IIA tested a series of alternative spatial options to that proposed in the Pre-Submission Local Plan, with Option 2b including Chatham Green (instead of Hammonds Farm). Option 2b is described as being rejected for three main reasons:</p> <ul style="list-style-type: none"> <li>• Transport <p>Chatham Green is relatively isolated from the strategic highway network and new railway station, with limited sustainable accessibility or opportunity for solutions.</p> <p>Its relative isolation from existing services and facilities which would lead to higher reliance on the use of the private car.</p> <p>Employment opportunities would be less accessible to the wider population (for example through public transport).</p> </li> <li>• Landscape capacity and sensitivity concerns.</li> <li>• Limited wastewater capacity to accommodate this development</li> </ul> <p>6.11 As with the SHELAA scoring, it appears that the IIA has failed to have regard to the technical evidence submitted by SPFL during the Local Plan process.</p>	<p>Disagreement with the analysis is noted; however there is no compelling evidence that the Chatham Green Site performs any better than the preferred allocations in respect of matters such as self-containment through mixed use development, relationship to established transport infrastructure and certainty of delivery.</p> <p>The IIA draws on technical evidence compiled on behalf of the Council enabling comparison between spatial options. This includes: a water cycle study, a parish audit, landscape sensitivity and capacity study, transport impact appraisal, and sustainable accessibility mapping.</p> <p>For example, the IIA notes that the scale of the site would require the provision of free-standing services such as schools and a neighbourhood centre. The IIA notes (p.194) that development may support investment in highways improvements and public transport provision which could help to mitigate adverse effects in this regard. Nevertheless, the Transport Impact Appraisal of Preferred Spatial Approach, March 2024. Options 2b (which includes Chatham Green) was considered to have a comparatively worse performance than more self-contained development and the Sustainable Accessibility Mapping &amp; Appraisal: (p.12) found that the Chatham Green site area exhibited the worst performance.</p> <p>With regard to landscape impacts, the IIA (p.202) cites technical evidence which concludes that the Chatham Green sites has an overall Low to Medium landscape capacity, reflecting an open agricultural landscape of relatively high visual sensitivity with modest opportunities for visual mitigation.</p>

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				<p>As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that:</p> <ul style="list-style-type: none"> <li>- Reasonable alternatives does not include all possible alternatives: the use of the word “reasonable” clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.</li> <li>- An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”.</li> <li>- The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.”</li> </ul> <p>A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA.</p>

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				No change to the IIA.
<b>PSIIA-3</b>	Essex Police	Section 3.4 paragraph 3.4.8	The document notes that crime can influence health, wellbeing, and deprivation. It is recommended when developing new communities there is engagement with the Designing out Crime Office (DOCO) to ensure crime is designed out in the early stages. Similarly, engagement with the DOCO can be used to evidenced strategic statements within the Health Impact Assessment.	Comment noted.  No change to the IIA.
<b>PSIIA-7</b>	Essex Police	Appendix J	Core Standard 1; Core Standard 2; Core Standard 3:  The Designing out Crime Office (DOCO) welcomes the acknowledgement within the Health Impact Statement that developers are required to 'create a safe and accessible built environment with well-designed public spaces that encourage community participation and designing out crime measures.'  It is advised that for Secured by Design (SBD) measures to be fully incorporated into schemes then there is engagement with the DOCO in the early stages and an SBD award applied for at the appropriate stage. This would support core standard 2 as new or refurbished active routes can be designed to be inclusive, safe, and sustainable. This would further align with the Violence Against Women and Girls (VAWG) strategy which has previously been alluded to within this document.  Using SBD products can support environmental and sustainability initiatives. (This has been detailed in section 3.2 'Strategic priorities' of this document.)	Comment noted.  No change to the IIA.
<b>PSIIA-5</b>	Essex Police	Section 5.2	Please note, that whilst this is a separate document, all previous comment in relation to the Local Plan Review correlate to this priority	Comment noted.  No change to the IIA.
<b>PSIIA-4</b>	Essex Police	Section 3.5 (paragraph 3.5.20)	The document notes that crime can influence health, wellbeing, and deprivation. It is recommended when developing new communities there is engagement with the DOCO to ensure crime is designed out in the early stages. Similarly, engagement with the DOCO can	Comment noted.  No change to the IIA.

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			be used to evidenced strategic statements within the Health Impact Assessment.	
<b>PSIIA-6</b>	Essex Police	Section 5.5	Early engagement with the DOCO is recommended to ensure the growth has a minimal impact on policing and is designed so future residents and visitors feel safe in their homes and community.	Comment noted.  No change to the IIA.
<b>PSIIA-56</b>	Catesby Land & Planning	Policy S6	<p>2.6 In this respect, the Council's stated justification in their Integrated Impact Assessment as summarised in the Pre-submission Housing Topic Paper is that meeting the higher housing requirement figure based on the new Standard Method: "Was discounted as it performed poorly overall [against the sustainability objectives] reflecting greater resource use with greater uncertainty overall such as potential oversupply of housing in the plan period, disrupting coordinated delivery against identified need. It would also disturb the balance between housing and jobs provision"</p> <p>2.7 This implies that the Council's decision for the Plan to proceed to Regulation 19 stage and onto Examination without meeting the new LHN in full, is not just a pragmatic attempt to minimise delays to Plan making but a deliberate and contrived attempt to avoid meeting the higher LHN in full because of concerns about environmental harm. It is implied that the Council sees the new LHN as optional rather than mandatory and the suggestions that meeting the LHN in full could lead to an oversupply of new homes is wholly unsubstantiated and is inconsistent with National Policy and not justified by the evidence. In particular, it is considered that this is at odds with both Government objectives in addressing the housing crisis, the Council's own declaration of a housing crises and the housing market evidence within the Council's Strategic Housing Needs Assessment.</p>	<p>The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process and has demonstrated that it can meet its development requirements as set out in Policy S7. This approach accords with the evidence base.</p> <p>As noted in the IIA analysis (p.190) whilst Option 3 would meet the full needs identified through the revised Standard Method (1,406 dwellings per annum) and is therefore also identified as having the potential for a long-term significant positive effect. The housing delivery rates over the past 10 years have been in the order of 1,000 dwellings per annum. Whilst the provision of a quantum of housing beyond the transitional need is likely to provide additional flexibility in delivery and choice of tenure, over-delivery could be disruptive to the local housing market with demand failing to match supply and potentially stalled developments. As a result, there is an element of uncertainty in relation to Option 3. Thus the identification of uncertainty reflects a reasonable concern that growth would disrupt the chosen plan approach in respect of transitional growth.</p> <p>No change to the IIA.</p>
<b>PSIIA-26</b>	Taylor Wimpey Strategic Land	Reasonable Alternatives	<p>5. STRATEGIC GROWTH SITE POLICY 2 – WEST CHELMSFORD</p> <p>5.1 Strategic Growth Site Policy 2 is not considered sound, due to its failure to incorporate allocation of the Site 21SHELAA41 as part</p>	<p>Comments on assessing all reasonable alternatives are noted.</p> <p>The IIA appraises the Local Plan Review from Issues &amp; Options Stage through to Submission. The Local Plan</p>



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			<p>of this strategic growth site.</p> <p>5.29 On one hand, it would be hopelessly simplistic to select or reject sites for allocation based on a scoring system such as that set out in the SHELAA. However, it does beg the questions as to what the purpose of providing the total score is; and, if the SHELAA is not being used to inform the selection / rejection of sites, what is?</p> <p>5.30 In respect of this last question, one could expect to find the answer to this in the IIA.</p> <p>5.31 The SEA Regulations require that for plans such as the emerging new Local Plan, an Environmental Report is prepared. In the case of the emerging new Local Plan, the IIA appears to seek to meet this obligation.</p> <p>5.32 The Environmental Report is required to identify, describe, and evaluate the likely significant effects on the environment of proposed options, as well as on reasonable alternatives (Regulation 12(2) of the SEA Regulations).</p> <p>5.33 As per Regulation 16 of the SEA Regulations, the Environmental Report is ultimately also required to explain the reasons for selecting options and rejecting others.</p> <p>5.34 The Site was assessed as part of the Draft Local Plan (DLP) IIA. A 'traffic light' scoring of the Site is presented in the IIA against multiple SA objectives, presented in Appendix M of the IIA. We note that this appraisal identifies a number of positives against various sustainability objectives. Where negative impacts are identified, these are largely as per those identified in the SHELAA. As discussed earlier, these can be largely mitigated and / or are not as significant as the SHELAA implied.</p> <p>5.35 However, despite the Site's appraisal within the IIA, the IAA does not attempt to explain why the Site is rejected and alternatives have been selected.</p> <p>5.36 Whilst it does seek to explain why the Site in conjunction with multiple others, including potential employment land, is not selected, this is of course different to considering the merits of the Site as a potential relatively modest extension to an existing Strategic Growth Site.</p>	<p>Review contains reasonable alternatives as spatial, site and policy options.</p> <p>The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Pre-Submission Consultation Document presents a suite of sites which are considered to be capable of meeting the identified development requirements, along with reasonable alternatives.</p> <p>As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that:</p> <ul style="list-style-type: none"> <li>- Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.</li> <li>- An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan, is not a "reasonable alternative".</li> <li>- The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a</li> </ul>



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				<p>reasonable alternative and it does not have to be included in the SEA Report or process.”</p> <p>A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA.</p> <p>No change to IIA.</p>
<b>PS11A -50</b>	Natural England	Habitats Regulations Assessment	<p>We have the following comments to make on the Chelmsford City Council Local Plan 2022 – 2041 Habitats Regulations Assessment (WSP, December 2024):</p> <p>We disagree with the statement in para 4.2.15 that none of the Pre-Submission allocations will have significant effects alone with the exception of Land North of South Woodham Ferrers and allocations that may affect functionally linked land (FLL). We consider that major developments within the recreational disturbance Zone of Influence (ZOI) established by Essex Coast RAMS, particularly the Garden Communities and those with over 100 dwellings, will have a likely significant effect taken alone. However, we consider that standard measures as detailed in our Suitable Alternative Natural Greenspace (SANG) Guidelines can provide suitable mitigation to address ‘alone’ impacts.</p> <p>We agree that the allocation at South Woodham Ferrers requires consideration under the Habitats Regulations due to its large size and proximity to a European site. However, all site allocations within the recreational disturbance ZOI established by the Essex Coast RAMS require consideration under the Habitats Regulations.</p> <p>With regard to FLL, we agree with the international sites that have been screened in (Table 4-10). We agree that windfall</p>	<p>We are pleased that Natural England consider the Local Plan ‘sound’ with regard to aspects relevant to their Natural Environment remit, notably requirements under the Habitat Regulations.</p> <p>Minor recommended updates to policy wording are therefore, to improve clarity rather than being necessary to achieve legal compliance. The comments received from Natural England are focused on ensuring that potential recreational pressure upon Habitats Sites through growth under the Local Plan are minimised, and as necessary effects mitigated.</p> <p>We acknowledge recommendations relating to Strategic Policies S4 – Conserving and enhancing the natural environment and S9 – Infrastructure requirements. The recommended minor changes to wording reference ‘other mitigation’ beyond payment under RAMS and the need to adopt the approach progressed under future iterations of the Essex Coast RAMS SPD (current version dated 2020) and we will consider preparing an addendum to address this if required.</p>

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			<p>developments that may be located on FLL can be determined at a project-level (section 5.5.7). However, note that any windfall development with suitable habitat that has the potential to affect FLL due to its proximity to coastal sites, should provide sufficient evidence to determine whether the application site constitutes FLL or not.</p> <p>We agree with the screening summary (section 4.4). With regard to 'Recreational Pressure/Urbanisation' (sections 5.2, 6.2, 7.2), we consider that more weight should be given in the HRA under 'Incorporated Mitigation' to bespoke scheme-level measures (e.g. the provision of sufficient accessible on-site green infrastructure and circular walks) that may be required by CCC for some developments, in addition to payments under the RAMS (paras 5.2.12, 6.2.7, 7.2.9).</p> <p>Subject to the provision of sufficient high quality accessible natural greenspace to mitigate alone impacts of larger developments, we agree with the conclusion that the Pre-Submission Local Plan will have no adverse effects on the integrity of the Essex Coast Habitats Sites due to recreational pressure or urbanisation effects, alone or in combination. Depending on the size of the proposal and its distance from the coast, adherence with all of the criteria in the NE SANG Guidelines 2021 may be required to fully mitigate alone impacts. In such cases, payment of the RAMS tariff is to mitigate for residual impacts, as the provision of greenspace will never fully prevent visits to the coast, nor is that the aim of such greenspace.</p> <p>We agree with the policies requiring provision of wastewater treatment capacity that require sufficient wastewater treatment to be available and effective for new development in advance of occupation. We note the particular reference to Great Leighs in this respect.</p> <p>As noted in the HRA, the impacts of the CCC Local Plan will not be substantive enough to prevent the achievement or maintenance of favourable conservation status at Epping Forest SAC, if the mitigation plans outlined in Local Plans adjacent to the SAC are delivered as proposed. Consequently, based on the</p>	<p>The above recommendations are consistent with comments on the <i>Chelmsford City Council Local Plan 2022 – 2041 Habitats Regulations Assessment</i> (WSP, December 2024) (Appendix N of the Pre-Submission IIA) which primarily relate to the potential effects of recreational pressure upon Habitats Sites resulting from growth under the Local Plan. Specifically, that the effects of allocations alone and in-combination must be considered, and as necessary effects mitigated, through project level actions such as the provision of Suitable Alternative Natural Greenspace (SANG) and strategic mitigation under the Essex Coast RAMS.</p> <p>Subject to the provision of sufficient high quality accessible natural greenspace to mitigate alone impacts of larger developments, Natural England is in agreement that the Pre-Submission Local Plan will have no adverse effects on the integrity of the Essex Coast Habitats Sites due to recreational pressure or urbanisation effects, alone or in combination.</p> <p>The HRA report considers allocations that may have significant effects 'alone' <i>'that are not obviously avoidable with the standard project-level measures that would be required to meet existing regulatory regimes'</i> in Paragraph 4.2.14 and notes that none of the pre-submission allocations will have significant effects alone with the exception of Land North of South Woodham Ferrers and allocations that may affect functionally linked land (FLL). Nonetheless, allocations are screened in for further assessment on the grounds that increases to recreational pressure are inherently cumulative in nature ensuring a robust assessment. We acknowledge that further clarity regarding the weighting given to project level measures designed to minimise the contribution of schemes 'alone' to overall recreational pressure would be helpful and we will consider preparing an Addendum to provide detail on this aspect if required.</p>



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available data including recent air quality modelling from other LPAs, it is considered that the Pre-Submission draft Local Plan will have no adverse effects on the integrity of Epping Forest SAC, alone or in combination.