

Chelmsford Local Plan: Focused Consultation Additional Sites (Regulation 19) Document

Integrated Impact Assessment – Feedback Report

1. Introduction

1.1 Chelmsford Local Plan: Focused Consultation Additional Sites (Regulation 19) 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)¹, 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 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')² that was consulted on between 11th August 2022 and 20th October 2022 and accompanied by an IIA report³.

The feedback received as part of the Issues and Options consultation was used to prepare the Preferred Options Consultation Document ('Preferred Options')⁴, accompanied by an IIA report. Consultation on the documents took place between 8th May 2024 and 19th June 2024.

The Local Plan Pre-Submission (Regulation 19) Document⁵ drew on the feedback received as part of the Preferred Options consultation and was consulted on between 4th February and 18th March 2025. This was the third stage of public consultation on the draft Local Plan and was accompanied by an Integrated Impact Assessment (IIA).

In light of changed circumstances for preparation of the Local Plan, the City Council undertook a focused consultation seeking representations on additional site allocations for inclusion within the review of the Local Plan to ensure that sufficient land is identified for development. An Addendum to the IIA of the Pre-Submission Consultation Document⁶ was produced to accompany the Focused Consultation Additional Sites (Regulation 19) Document⁷ produced by Chelmsford City

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

² <https://www.chelmsford.gov.uk/media/chehlnlq/issues-and-options-consultation-document.pdf>

³ <https://www.chelmsford.gov.uk/media/undd21y/chelmsford-local-plan-issues-and-options-iaa.pdf>

⁴ [preferred-options-integrated-impact-assessment.pdf](#)

⁵ [Pre Submission Consultation 2025](#)

⁶ WSP (2025) Integrated Impact Assessment of the Pre-Submission Chelmsford Local Plan

⁷ Chelmsford City Council (2025) Additional Sites (Regulation 19) Document

Council and consulted on between 20th November 2025 and 8th January 2026. The consultation responses made to the Additional Sites IIA Addendum (2025) are set out in this report.

1.2 The Integrated Impact Assessment Report

The Council is required to carry out a Sustainability Appraisal (SA) of the Local Plan Review⁸. 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 regulations⁹ 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)¹⁰ 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 Additional Sites IIA and HRA Reports and will be part of the suite of documents submitted for Examination.

1.5 Conclusion

Taking into account the comments made and responses provided, no changes to the IIA are considered to be required at this stage.

⁸ The requirement for SA of local plans is set out under section 19(5) of the Planning and Compulsory Purchase Act 2004.

⁹ Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633).

¹⁰ [Habitats regulations assessments: protecting a European site - GOV.UK](https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site)

2. Consultation Review

2.1 Responses

A total of 47 comments were made by 41 respondents on the Additional Sites (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

Type of Respondent	Number of Respondents
Parish/Town Councils or adjoining Local Authorities	3
Developers or Representatives	19
Other Agencies and Authorities	3
Members of the Public	16

2.2 Schedule of Responses to the Additional Sites IIA Report

Main Issues Raised

The main issues raised by respondents with regard to the Additional Sites IIA Report are:

- Objections to specific proposed additional site allocations in respect of key sustainability criteria and site-related constraints.
- Suggested lack of justification for the proposed allocations, particularly in respect of the use of evidence and the discounting of alternative sites which perform as well as or better as the proposed sites in sustainability terms.
- Questioning of the scoring by the IIA for specific indicators and how mitigation measures will be applied.
- Concern over the imposition of a disproportionate scale of growth on settlements with limited infrastructure and poor sustainable transport choices, contrary to the settlement hierarchy.
- View that the proposed pattern of development will harm sustainability with risks identified in the IIA which seeks to neutralise them through assumptions, mitigation at a later stage, and uncertainty scoring.
- Suggestion of inadequate testing of site constraints and inadequate consultation on site proposals.
- Suggestion that cumulative effects associated with recreational pressure on European sites need to be considered.
- Suggestion of a lack of consideration of alternative spatial options which are deemed more sustainable, consequently invalidating the choice of preferred allocations.

- Concern that a lack of a comprehensive Green Belt review undermines 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.
- Suggestion of a lack of consideration of the availability and capacity of strategic and community infrastructure.
- Suggestion of 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.
- Suggestion of inconsistency in the presentation of the 5-year Housing Land Supply figure.
- 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 Comments and Responses

ID	Consultee	Rep ID	Summary Comment	Response/Action
1392626	Mr Tom Welsh	ASIIA-1	Appendix D, tables D2 - D5 go into significant detail in relation to the Additional 14 SHELAA sites that have been identified. However, I cannot see anywhere the same detailed analysis of the existing sites that have been allocated greater numbers (in particular Growth Site 14b - Ford End). Without that analysis it is hard to assess whether or not the additional allocations (75 up from 20 in Ford End) have been treated or measured fairly.	An equivalent analysis of Site 14b (SHELAA site CFS216 Land South Of Church Of England Primary School Main Road Ford End Chelmsford Essex) is set out in the Pre-Submission IIA, Appendix M pp.806, 804, 859, 881.
308802	Mr Stewart Eade	ASIIA-2	Chelmsford Council is proposing a new residential development on Grade 1 agricultural land west of Patching Hall Lane. Local residents argue the site is unsuitable due to significant loss of privacy, light, views, and wellbeing; destruction of wildlife habitats; loss of valuable farmland; and removal of a key green buffer that prevents urban sprawl. Concerns include increased traffic, congestion, and noise; heightened risks to road safety for children walking to nearby schools; and greater pollution. The field plays a vital role in water drainage in a high flood-risk area, and development could worsen flooding for existing homes. Local infrastructure—including schools, GP surgeries, and public transport—is already over capacity. The plan conflicts with the Broomfield Community Plan and was not part of Chelmsford's original Local Plan.	<p>The role of the IIA is to present an assessment of likely significant effects and where opportunities exist for their mitigation in light of proposed policies, and consequently enhancement of their overall sustainability performance.</p> <p>The site assessments within the IIA were undertaken using GIS analysis to ensure consistent treatment. Where a site is selected, the specific requirements of Strategic and Development Management Policies will implement mitigation measures in response to the detailed plans submitted by site proposers.</p> <p>In particular, the provision and capacity of appropriate community infrastructure is a matter for the relevant authority in conjunction with the Council to ensure that adequate provision is made as part of new development, guided by plan policies.</p> <p>No change to the IIA.</p>

ID	Consultee	Rep ID	Summary Comment	Response/Action
1396975	Mr Owen Hoare	ASIIA-3	<p>This representation is submitted on behalf of concerned local residents of Bicknacre who object to the proposed designation of Strategic Growth Site Policy 11c, Land West of Barbrook Way, Bicknacre, for around 250 dwellings and associated uses in the Focused Consultation Additional Sites (Regulation 19) document. The allocation is not sound because it is not justified, in that it is not the most appropriate strategy when considered against reasonable alternatives, including other additional sites and brownfield opportunities that perform better in the Integrated Impact Assessment. It is not effective, as it would impose a disproportionate scale of growth on a small village with limited infrastructure and poor sustainable transport choices, contrary to the settlement hierarchy. It is also not consistent with national policy, particularly the requirement to focus significant development on locations that are or can be made sustainable, and to protect and enhance valued landscapes, biodiversity, best and most versatile agricultural land, and the historic environment. Accordingly, the allocation should be reverted to a modest capacity more in line with the earlier Pre Submission allocation of around 20 dwellings on a small part of the site.</p> <p>The Council's own IIA acknowledges that while Site 11c would deliver additional housing, it is a constrained and sensitive location. It carries clear environmental constraints and only mixed or uncertain performance in relation to key objectives such as the local economy, sustainable living patterns, health, transport and cultural heritage. On any objective reading, this is not the profile of a strong candidate for a large edge of settlement allocation of around 250 dwellings.</p> <p>The Integrated Impact Assessment confirms that an enlarged Site 11c is a constrained and sensitive location. It records negative or uncertain effects for biodiversity, the water environment, cultural heritage and land use, and only mixed performance for key objectives such as the economy, sustainable living, health and transport. Those conclusions reflect the site's proximity to Thrift Wood SSSI and other</p>	<p>The role of the IIA is to present an assessment of likely significant effects and where opportunities exist for their mitigation in light of proposed policies, and consequently enhancement of their overall sustainability performance.</p> <p>The site assessments within the IIA were undertaken using GIS analysis to ensure consistent treatment. Where a site is selected, the specific requirements of Strategic and Development Management Policies will implement mitigation measures in response to the detailed plans submitted by site proposers.</p> <p>In particular, the provision and capacity of appropriate community infrastructure is a matter for the relevant authority in conjunction with the Council to ensure that adequate provision is made as part of new development, guided by plan policies.</p> <p>Paragraphs 2.126 – 2.128 of the Additional Sites (Regulation 19) Document note that: <i>"2.126 National Planning Policy requires councils to identify land in local plans to accommodate ten percent of their housing requirement figure on sites no larger than one hectare. This site was identified in the Pre-Submission Local Plan (February 2025) for an allocation for around 20 new homes, to help meet this requirement. This formed part of a larger promoted area. 2.127 A larger area is now being proposed to help meet the increased housing requirement and boost housing supply. Allocating this site will help to support existing village services and to maintain a diverse housing supply, with a proportion of homes expected to be delivered within five years.</i></p>

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			<p>priority habitats, its relationship with Bicknacre Priory Scheduled Monument and nearby listed buildings, its greenfield agricultural status and its location adjacent to a water body. They are reinforced by the detailed concerns in relation to landscape and settlement character, highways and transport, flood risk and drainage that have been consistently raised through consultation and at application stage.</p> <p>At the same time, the Additional Sites IIA clearly identifies more sustainable alternatives. In particular, the former Kay Metzeler site at Brook Street and other urban or urban edge opportunities perform materially better across multiple objectives, without the same concentration of environmental and heritage constraints. Within the preferred Option 1 strategy of additional small and medium sites, there is no evidential basis for selecting a large, environmentally sensitive greenfield extension at Bicknacre in preference to higher scoring brownfield and better located sites. To do so ignores reasonable alternatives that would deliver comparable housing numbers with fewer adverse impacts. In these circumstances, the decision to retain Site 11c at a capacity of around 250 dwellings cannot be regarded as justified or as the most appropriate strategy when considered against reasonable alternatives.</p>	<p><i>2.128 Our evidence studies have been updated to assess the proposed increased allocation, including education provision, traffic, and wastewater. In response to this, the policy includes mitigation to ensure improved walking and cycling links into the village centre and towards the school, contributions towards education facilities, and landscape measures including planting belts and buffers. However, there are no overriding constraints that would hinder the delivery of the larger site."</i></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 and sets out a number of spatial strategy options which have been developed taking the site options into account along with other matters and evidence.</p> <p>No change to the IIA.</p>
1380086	Mr Christopher Harp	ASIIA-4	<p>Growth Area 3 – South and East Chelmsford represents a pattern of incremental, dispersed development that cumulatively: Exacerbates transport congestion, Overloads healthcare and education services, Places unacceptable pressure on sensitive environmental assets, Relies on infrastructure that is neither secured nor deliverable. The IIA addendum itself identifies many of these risks but seeks to neutralise them through assumptions, mitigation at a later stage, and uncertainty scoring. This is not a robust basis for allocation.</p> <p>The IIA Addendum acknowledges that increased housing in peripheral and village locations will increase car-based travel, adding pressure to an already constrained highway network,</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 and sets out a number of spatial strategy options which have been developed taking the site options into account along with other matters and evidence.</p> <p>The role of the IIA is to present an assessment of likely significant effects and where opportunities exist for their mitigation in light of proposed</p>

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			<p>including the A12, A130, A414 and A132 corridors, all of which are identified as suffering from congestion and pinch points.</p> <p>The IIA concedes that population growth in Growth Area 3 risks undermining the quality of existing healthcare services, particularly GP and primary care provision, unless new facilities are delivered alongside development. No specific, funded or time-bound healthcare infrastructure is identified for the South and East Chelmsford sites.</p> <p>Existing services, particularly in South Woodham Ferrers and surrounding villages, are already operating close to capacity. The local plan cannot rely on Broomfield Hospital which is currently underperforming. This approach is inconsistent with the requirement to align healthcare infrastructure with growth, and risks unacceptable pressure on NHS services.</p> <p>The combined effect of multiple allocations across villages and edge-of-settlement sites will place significant pressure on primary and secondary education provision. The IIA’s conclusion that effects are “minor” or “uncertain” fails to reflect the cumulative reality of multiple developments feeding into the same limited education catchments.</p> <p>The IIA accepts that Growth Area 3 lies close to highly sensitive environmental assets, including: The Crouch and Roach Estuaries SPA and Ramsar sites, Multiple SSSIs and Local Wildlife Sites, Areas vulnerable to recreational pressure, air quality impacts and water pollution. The assessment relies heavily on the assumption that impacts will be “addressed at project level”. The scale of in-combination effects from multiple sites is downplayed.</p>	<p>policies, and consequently enhancement of their overall sustainability performance.</p> <p>The site assessments within the IIA were undertaken using GIS analysis to ensure consistent treatment. Where a site is selected, the specific requirements of Strategic and Development Management Policies will implement mitigation measures in response to the detailed plans submitted by site proposers.</p> <p>In particular, the provision and capacity of appropriate community infrastructure is a matter for the relevant authority in conjunction with the Council to ensure that adequate provision is made as part of new development, guided by plan policies.</p> <p>The Habitats Regulations Assessment (HRA): Focused Consultation Additional Sites (Regulation 19) Addendum (November 2025), concludes that:</p> <p>“3.2.4. The appropriate assessment concluded that the Local Plan will have no adverse effects (either alone or in combination) on the integrity of those sites considered vulnerable (both exposed and sensitive) to increased visitor pressure as a result of the plan (i.e. Essex Estuaries SAC, Crouch and Roach Estuaries (Mid-Essex Coast Phase 3) SPA/ Ramsar, Blackwater Estuary (Mid-Essex Coast Phase 4) SPA/Ramsar, Dengie (Mid-Essex Coast Phase 1) SPA/ Ramsar due to the adoption of the Essex Coast RAMS in policy. This conclusion accounted for measures included within policy relating to open-space provision</p>

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				<p>although these are not relied on to ensure adverse effects do not occur. 3.2.5. The proposed changes to the site allocations set out in Table 3-1 do not affect this conclusion. There has been no material change in scale or location of development in proximity to those sites considered vulnerable to increased visitor pressure and the adoption of the Essex Coast RAMS in policy still stands.”</p> <p>No change to the IIA.</p>
1358507	National Trust	ASIIA-5	<p>Taken as a whole the mosaic of habitats across Danbury Ridge is an important landscape for wildlife which is more than the sum of its parts. We are concerned, that residential development on the sites identified in the focussed consultation document could indirectly impact the SSSIs through additional cumulative recreational pressure arising from growth in the wider area. We consider impacts on the SSSIs and Ancient Woodlands should be assessed at the Local Plan stage and scale, rather than for individual planning applications, so that cumulative impacts for the plan period can be adequately assessed and appropriate mitigation can be ensured.</p>	<p>The IIA recognises that there is the potential for impacts on the SSSIs and Ancient Woodlands 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 relevant site allocation policy and wider supporting policies.</p> <p>No change to the IIA.</p>
1380218	Taylor Wimpey Strategic Land	ASIIA-7	<p>The lack of accessibility to key day-to-day services which are typically contained within shopping areas of neighbourhood centres is demonstrated in the Integrated Impact Assessment evidence base for the emerging Local Plan. Table 2 (see attachment 1380218IIA-A.pdf) sets out extracts of the IIA conclusions for each of the proposed additional sites in respect of their accessibility to services and facilities. It demonstrates that the majority of sites containing proposed additional housing are not in close proximity to these day-to-day amenities – an approach which will not promote a sustainable pattern of development.</p>	<p>The role of the IIA is to present an assessment of likely significant effects and where opportunities exist for their mitigation in light of proposed policies, and consequently enhancement of their overall sustainability performance.</p> <p>The site assessments within the IIA were undertaken through GIS analysis to ensure consistent treatment. Where a site is selected, the specific requirements of Strategic and Development Management Policies will implement</p>

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				<p>mitigation measures in response to the detailed plans submitted by site proposers.</p> <p>In particular, the provision and capacity of appropriate community infrastructure is a matter for the relevant authority in conjunction with the Council to ensure that adequate provision is made as part of new development, guided by plan policies.</p> <p>No change to the IIA.</p>
1380218	Taylor Wimpey Strategic Land	ASIIA-7	<p>The approach adopted by CCC in this additional site selection has entirely excluded Green Belt locations from consideration. This approach means that CCC has not considered locations for housing which could be more sustainably located than the proposed additional sites.</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 Belt review. This approach accords with the evidence base.</p> <p>No change to the IIA.</p>
1389476	Essex & Suffolk Water	ASIIA-8	<p>The effect of development on water resources within the area will not occur in isolation; it will be both cumulative and sequential. This means that as multiple sites are brought forward over time, the combined demand on water supply and network capacity will increase progressively. Early consideration of these cumulative impacts is essential to ensure that infrastructure planning keeps pace with growth and that sufficient water resources remain available to meet both domestic and non-domestic needs.</p>	<p>The role of the IIA is to present an assessment of likely significant effects and where opportunities exist for their mitigation in light of proposed policies, and consequently enhancement of their overall sustainability performance.</p> <p>The site assessments within the IIA were undertaken through GIS analysis to ensure consistent treatment. Where a site is selected, the</p>

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				<p>specific requirements of Strategic and Development Management Policies will implement mitigation measures in response to the detailed plans submitted by site proposers.</p> <p>In particular, the provision and capacity of appropriate community infrastructure is a matter for the relevant authority in conjunction with the Council to ensure that adequate provision is made as part of new development, guided by plan policies.</p> <p>No change to the IIA.</p>
1358507	National Trust	ASIIA-9	<p>The IIA 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>Strategic Policies S4 – Conserving and enhancing the natural environment and S9 – Infrastructure requirements are drafted to ensure that development effects are anticipated, minimised and mitigated at the site level. Uncertainty recorded within the IIA scoring reflects available evidence which will be gathered in respect of site level development.</p> <p>No change to the IIA.</p>
1397392	Mr Nick Wood	ASIIA-10	<p>Strategic Growth Site Policy 11c – Land West of Barbrook Way, Bicknacre.</p> <p>Existing amenities are not sufficient for current needs, particularly the doctor's surgery and transport links. With the addition on 20 houses this would have caused addition problems; with the addition of 250 houses the doctor's surgery has said it cannot take additional patients and the transport links would cause serious congestion and danger to school children and other vulnerable people who walk through the village. The isolation of the new estate will mean that a car will be necessary for any journey, even to the school, doctors, shops, pubs? An estate of 250 houses will mean a huge proportionate number of cars, delivery vans and vehicles while the estate is under construction.</p>	<p>The role of the IIA is to present an assessment of likely significant effects and where opportunities exist for their mitigation in light of proposed policies, and consequently enhancement of their overall sustainability performance.</p> <p>The site assessments within the IIA were undertaken through GIS analysis to ensure consistent treatment. Where a site is selected, the specific requirements of Strategic and Development Management Policies will implement mitigation measures in response to the detailed plans submitted by site proposers.</p>

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			<p>There will be an issue with surface water and sewerage. Considerable work will need to be done to stop the effects of water collecting in the proposed area – i.e. significant water courses or ponds will have to be constructed– who will maintain these? Will the knock-on effect of hard standing areas, roads, etc. be assessed and adequate measures put in place to deal with this. The sewage drains do not have capacity for the number of new houses proposed so a new drainage system along Bicknacre Road will be required connecting to the Chelmsford treatment plant. Will this be done as part of the construction of the estate?</p>	<p>In particular, the provision and capacity of appropriate community infrastructure is a matter for the relevant authority in conjunction with the Council to ensure that adequate provision is made as part of new development, guided by plan policies.</p> <p>No change to the IIA.</p>
1397422	Mr Mark Binnie	ASIIA-11	<p>Added sites: 11c – Bicknacre, 21a & 21b – Woodham Ferrers The site is inappropriate. The existing infrastructure can not cope today - e.g. schools, doctors, dentist and local transport. Building on this site will cause additional flooding from surface water, to properties and roads (Priory and Bicknacre Road). Waterways/streams are not maintained by Environment agency. The current sewerage/waste cannot cope with additional waste. Properties on Priory Road, already suffer from sewer backups onto properties, which is a health risk and very unpleasant.</p>	<p>The role of the IIA is to present an assessment of likely significant effects and where opportunities exist for their mitigation in light of proposed policies, and consequently enhancement of their overall sustainability performance.</p> <p>The site assessments within the IIA were undertaken using GIS analysis to ensure consistent treatment. Where a site is selected, the specific requirements of Strategic and Development Management Policies will implement mitigation measures in response to the detailed plans submitted by site proposers.</p> <p>In particular, the provision and capacity of appropriate community infrastructure is a matter for the relevant authority in conjunction with the Council to ensure that adequate provision is made as part of new development, guided by plan policies.</p> <p>No change to the IIA.</p>
1397557	Mr Peter Bayley	ASIIA-14	<p>Comments on IIA Scoring, Page 15, reference- Land West of Patching Hall Lane SGS19. Column 1- Bio-Diversity and Geodiversity. The development will have a significant negative effect on bio-diversity and</p>	<p>The role of the IIA is to present an assessment of likely significant effects and where opportunities exist for their mitigation in light of proposed policies, and consequently enhancement of their overall sustainability performance.</p>

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			<p>geodiversity instead of a minor negative effect as indicated in the table. Column 6- Transport. The development will have a minor to significant negative effect on Transport rather than the mixture of positive and negative indicated in the table. Column 14 - Landscapes and Townscapes. The development will have a significant negative effect on the Landscape rather than the neutral effect shown in the table.</p>	<p>The site assessments within the IIA were undertaken using GIS analysis to ensure consistent treatment. Where a site is selected, the specific requirements of Strategic and Development Management Policies will implement mitigation measures in response to the detailed plans submitted by site proposers.</p> <p>In particular, the provision and capacity of appropriate community infrastructure is a matter for the relevant authority in conjunction with the Council to ensure that adequate provision is made as part of new development, guided by plan policies.</p> <p>No change to the IIA.</p>
1360409	Mr Alasdair Heathcote	ASIIA-15	<p>The existing school and medical facilities in Bicknacre would not be able to support the additional population that 250 homes will bring. This site has too many issues to make it a viable site - existing approved sites such as the Development area in South Woodham have not been activated despite the construction of a health centre and a major supermarket. Without a detailed proposal to upgrade schools, health facilities and road access the proposed site is unworkable.</p>	<p>The role of the IIA is to present an assessment of likely significant effects and where opportunities exist for their mitigation in light of proposed policies, and consequently enhancement of their overall sustainability performance.</p> <p>The site assessments within the IIA were undertaken using GIS analysis to ensure consistent treatment. Where a site is selected, the specific requirements of Strategic and Development Management Policies will implement mitigation measures in response to the detailed plans submitted by site proposers.</p> <p>In particular, the provision and capacity of appropriate community infrastructure is a matter for the relevant authority in conjunction with the Council to ensure that adequate provision is made as part of new development, guided by plan policies.</p>

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				<p>The reason for increasing the allocation at Bicknacre is set out in the Additional Sites Document (p.43): Pre Submission Additional Sites Consultation 2025 as follows:</p> <p>“2.126 National Planning Policy requires councils to identify land in local plans to accommodate ten percent of their housing requirement figure on sites no larger than one hectare. This site was identified in the Pre-Submission Local Plan (February 2025) for an allocation for around 20 new homes, to help meet this requirement. This formed part of a larger promoted area.</p> <p>2.127 A larger area is now being proposed to help meet the increased housing requirement and boost housing supply. Allocating this site will help to support existing village services and to maintain a diverse housing supply, with a proportion of homes expected to be delivered within five years.</p> <p>2.128 Our evidence studies have been updated to assess the proposed increased allocation, including education provision, traffic, and wastewater. In response to this, the policy includes mitigation to ensure improved walking and cycling links into the village centre and towards the school, contributions towards education facilities, and landscape measures including planting belts and buffers. However, there are no overriding constraints that would hinder the delivery of the larger site.”</p> <p>No change to the IIA.</p>
1329445	A.G. & P.W.H Speakman	ASIIA-16	This representation addresses the omission of Anchor Field, Danbury (Site 21SHELAA82) from the Chelmsford Local Plan Review site allocations. The site is assessed as available and achievable, with manageable constraints, but was not included	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

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			<p>in the Addendum’s options despite its potential to support early housing delivery and plan flexibility. The submission criticizes the Council’s assessment process, particularly the grouping of sites in the Integrated Impact Assessment, which fails to appraise individual site merits and masks differences in sustainability and deliverability. The document argues that the current approach does not comply with national policy or legal requirements for robust alternatives assessment. It recommends a more nuanced, site-specific appraisal and the allocation of Anchor Field to enhance the Local Plan’s soundness, flexibility, and ability to meet housing needs. The omission is seen as a missed opportunity to address delivery shortfalls and improve the plan’s effectiveness.</p> <p>In summary, concerns arise in three principal respects. First, the site appears to not have been included within either Option 1 or Option 2, notwithstanding the inclusion of other sites in the Danbury area. Second, the grouping methodology adopted within the IIA undermines the robustness of the appraisal and the identification of reasonable alternatives. Third, a more credible and legally compliant approach would involve a Comparative appraisal of individual sites against the sustainability objectives, assessing larger sites both as Standalone deliverable options and, where appropriate, as components of wider strategic growth. Such an approach would be far more likely to identify a balanced and justified strategy comprising a mix of sites—including the Site—which would materially enhance the soundness and effectiveness of the emerging Local Plan.</p>	<p>options and reasonable alternatives have been tested through this iterative process.</p> <p>The reasons for the selection of Option 1 and the sites identified are set out in the IIA Addendum Report and include accordance with: the Local Plan’s Strategic Priorities, Vision, Spatial Principles; the settlement hierarchy; and the presence of an approved Masterplan, and/or planning permission and/or resolution to grant planning permission, demonstrating their deliverability.</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"> - 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. - 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”.

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				<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>All sites have been assessed on an equal basis in the Pre-Submission IIA (Appendix M) and the Additional Sites IIA (Appendix C).</p> <p>No change to the IIA.</p>
1397874	Taylor Wimpey Strategic Land	ASIIA-17	<p>The SEA Regulations require the Environmental Report to identify, describe, and evaluate the likely significant effects on the environment of proposed options, as well as on reasonable alternatives (Regulation 12(2) of the SEA Regulations).</p> <p>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. We have significant concerns with how the options considered by the IIA have been derived, and how they have been appraised, having regard to reasonable alternatives.</p> <p>Clearly there are some sites within Option 1 that contribute significantly less than others to these objectives. Similarly, and perhaps of more relevance, there are sites that have been included within Option 2 that contribute better to the DLP’s proposed strategic priorities, vision and spatial principles.</p> <p>The conclusion that smaller sites are inherently in accordance with the settlement hierarchy, whilst those in Option 2, is entirely spurious. Sites within Option 1 include those that would provide extensions to lower tier settlements; whereas there are sites</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.</p> <p>The reasons for the selection of Option 1 and the sites identified are set out in the IIA Addendum Report and include accordance with: the Local Plan’s Strategic Priorities, Vision, Spatial Principles; the settlement hierarchy; and the presence of an approved Masterplan, and/or planning permission and/or resolution to grant planning permission, demonstrating their deliverability.</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>within Option 2 that would provide extensions to settlements at the top of the settlement hierarchy.</p> <p>Similarly, it is simply not credible to suggest that the small sites identified all and / or as a basket of sites perform relatively better than all the options entailing provision of larger sites in respect of housing and economy and employment, and relatively well in respect of sustainable living and revitalisation, health and wellbeing, and transport. Again, there are sites within the set of small sites proposed located in locations which are far less well-connected and have limited access to sustainable transport opportunities than some of the sites in Option 1. Part of the issue with the IIA is that it has amalgamated the small sites into a single entity which has then been appraised. Similarly, it has grouped various large sites together, but failed to consider sites within these groupings that could come forward independently of the others with which they have been grouped for the purpose of the IIA. The problematic nature of this approach is evident when one considers that the reasons for rejection of Option 2 include infrastructure requirements being unproven and inability to be relied upon in the first five years of the Plan. However, if one were to separate out the sites that have been grouped together within Option 2, one would find sites that whilst still relatively large could nevertheless contribute to housing within the first five years from adoption of the DLP and which do not require significant infrastructure upgrades that could be a barrier to delivery.</p> <p>The problems with the IIA, we suggest, largely stem from the way that sites have been grouped before being assessed. A more effective approach that would ensure a robust appraisal of reasonable alternatives would be to undertake a comparative appraisal of the various potential sites against the sustainability objectives. This may well identify that a mix of sites, including some that are currently within Option 1 as well as those within Option 2, represents a sustainable and justified approach.</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"> - 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. - 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”. - 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>All sites have been assessed on an equal basis in the Pre-Submission IIA (Appendix M) and the Additional Sites IIA (Appendix C).</p> <p>No change to the IIA.</p>

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			<p>This has resulted in sites that are clearly less sustainable than alternatives been grouped together and assessed against an alternative grouping of sites. However, both groupings appear arbitrary and we suggest further explanation and justification of how the IIA has arrived at these two options. At present, it appears a false choice between a basket of small sites and taking a strategic approach. We suggest a more nuanced approach is required in which the sustainability of the individual small sites needs to be considered relative, and potentially alongside, more strategic options. At present, we suggest there is a significant risk that the IIA does not comply with the SEA Regulations.</p>	
1095979	Mr Graham Poulteney	ASIIA-18	<p>Firstly, Ford End already possesses a perfectly adequate, if under used village hall. What Ford End does not have is any sort of shop; no doctors or pharmacy; an erratic and totally unreliable bus service - none of which is being addressed as far as i can see in the proposals. Finally, there is the issue of traffic. We are told that because the B1008 is a "priority route" for emergency services then nothing can be done about reducing or slowing the ever increasing volume of speeding traffic. Now, suddenly, a roundabout is proposed for the single access point for the development. If this is simply going to be a white painted circle then please excuse my sceptism. Also, are you still using a hopelessly out of date traffic measurement system. Conservatively, 75 new dwellings is going to produce 150 new vehicles to the village, most moving at least twice on an average day. Have you considered the level of additional emissions right next to a primary school, and how carefully have you actually considered "traffic calming measures". This proposal has now got much to large for the village to accomodate.20 new dwellings was tolerable; 50 was a stretch, and 75 is simply down to the developers' greed and the Council's timid acquiescence.</p>	<p>The role of the IIA is to present an assessment of likely significant effects and where opportunities exist for their mitigation in light of proposed policies, and consequently enhancement of their overall sustainability performance.</p> <p>The site assessments within the IIA were undertaken through GIS analysis to ensure consistent treatment. Where a site is selected, the specific requirements of Strategic and Development Management Policies will implement mitigation measures in response to the detailed plans submitted by site proposers.</p> <p>In particular, the provision and capacity of appropriate community infrastructure is a matter for the relevant authority in conjunction with the Council to ensure that adequate provision is made as part of new development, guided by plan policies.</p> <p>The reason for increasing the allocation is set out in the Additional Sites document (p.40): Pre Submission Additional Sites Consultation 2025 as follows:</p>

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				<p>2.113 National Planning Policy requires councils to identify land in local plans to accommodate 10% of their housing requirement figure on sites no larger than one hectare. This site was identified in the Pre-Submission Local Plan (February 2025) for an allocation for around 20 new homes, to help meet this requirement. This formed part of a larger promoted area.</p> <p>2.114 A larger area is promoted by the landowner and is now being proposed to help meet the increased housing requirement and boost housing supply. Allocating this site will help to support existing village services and to maintain a diverse housing supply, with all the homes expected to be delivered within five years.</p> <p>No change to the IIA.</p>
1392958	Mr Kannan Rajesparan	ASIIA-19	<p>The scoring for site appraisal criteria for site 19 (Land West of Patching Hall Lane) has been inappropriately scored more positively than they should across several criteria. (Appendix C, Page 11). If these criteria were appropriately assessed and scored, the overall score would make this an unsuitable site for development.</p> <p>Several criteria in the table have been scored higher than they should be:</p> <ol style="list-style-type: none"> 1. There will be a negative impact on Wellbeing - Use of fields by local residents 2. Negative impact on flooding 3. Cultural Heritage; Townscape and Landscape - Loss of this field will negatively impact the Townscape The field provides a natural break between settlements preventing coalition. 4. Biodiversity and geodiversity - Fields home to native wildlife – 5. Impact on educational establishments - local schools (nursery, primary and secondary) are at capacity, 6. Transport – increase in traffic, inadequate public transport, safety issues. 	<p>The role of the IIA is to present an assessment of likely significant effects and where opportunities exist for their mitigation in light of proposed policies, and consequently enhancement of their overall sustainability performance.</p> <p>The site assessments within the IIA were undertaken using GIS analysis to ensure consistent treatment. Where a site is selected, the specific requirements of Strategic and Development Management Policies will implement mitigation measures in response to the detailed plans submitted by site proposers.</p> <p>In particular, the provision and capacity of appropriate community infrastructure is a matter for the relevant authority in conjunction with the Council to ensure that adequate provision is made as part of new development, guided by plan policies.</p>

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				No change to the IIA.
873317	Van Diemans Property Company	ASIIA-21	This representation relates to land north of the Coal Yard, Chelmsford. It supports the principle of identifying additional sites to enhance plan flexibility but raises concerns regarding the exclusion of suitable employment land within Green Wedge areas. The representation notes that the Draft Local Plan's minimum housing provision (22,990 dwellings) remains below the standard method requirement, and stresses the importance of ensuring an appropriately balanced supply of employment land. Land north of the Coal Yard forms part of an established employment cluster, is highly accessible, and is capable of early delivery of employment-led, mixed-use development consistent with Policies S6, S7, E1 and E2 of the Draft Plan and the NPPF's sustainable development objectives. It is contended that a modest Green Wedge boundary adjustment would not compromise its strategic function and could deliver landscape and connectivity benefits. Inclusion of the site would strengthen the Plan's effectiveness, ensuring alignment between housing and employment growth while improving its deliverability and resilience to change.	<p>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 Additional Sites consultation 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>
873301	Cliffords Group Ltd	ASIIA-22	This representation concerns land at Drakes Farm, North Chelmsford. It supports the principle of introducing additional allocations to address identified delivery shortfalls but raises concern that the approach taken fails to fully capture sustainable and deliverable opportunities in North Chelmsford. Land at Drakes Farm has previously been assessed through the Council's SHELAA and found suitable in principle for development. Constraints relating to minerals safeguarding, landscape, and neighbouring uses can be appropriately mitigated through design and phasing, while the site's location offers strong accessibility and connectivity benefits. Its allocation would therefore strengthen the Plan's ability to meet housing and employment needs in accordance with the NPPF's sustainable development objectives.	<p>A range of development quanta, broad distributions of development and site options available have been tested through the IIA at all stages of the Local Plan's evolution. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process.</p> <p>The reasons for the selection of Option 1 and the sites identified are set out in the IIA Addendum Report and include accordance with: the Local Plan's Strategic Priorities, Vision, Spatial Principles; the settlement hierarchy; and the presence of an approved Masterplan, and/or planning permission and/or resolution to grant</p>

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			<p>The representation questions the Integrated Impact Assessment's rationale for preferring Option 1, highlighting inconsistencies with Strategic Policy S1 and the settlement hierarchy. The omission of Drakes Farm from either option undermines the positive preparation, justification, and effectiveness of the Draft Local Plan. Inclusion of the site would provide a logical, sustainable, and deliverable extension to North Chelmsford, improving the Plan's flexibility and alignment with national policy</p>	<p>planning permission, demonstrating their deliverability.</p> <p>No change to the IIA.</p>
1330405	Cliffords Group Ltd and Mr Mark Peters	ASIIA-23	<p>This representation relates to land at Campions Farm, Broomfield. It supports the principle of identifying additional sites but raises concern that the Council's approach has unjustifiably excluded sustainable Green Wedge locations such as Campions Farm. The representation notes that Chelmsford can no longer demonstrate a five-year housing land supply following delays to strategic sites and cancellation of the A12 widening scheme. Additional allocations are therefore essential to maintain delivery and ensure the Plan's effectiveness. Campions Farm was assessed through the SHELAA (CFS212) and found suitable in principle, with constraints capable of being mitigated through sensitive design, connectivity enhancements and environmental safeguards. Its omission limits the Plan's ability to meet identified housing and sustainability objectives. Concerns are also raised regarding the Integrated Impact Assessment, which applies broad assumptions across sites and fails to scrutinise the relative sustainability of Green Wedge options. Without reviewing this designation and considering appropriate releases, the Draft Local Plan cannot be regarded as positively prepared, justified or consistent with national policy.</p>	<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 Additional Sites consultation 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>
873301	Cliffords Group Ltd	ASIIA-24	<p>This representation relates to land south of Wheelers Hill. It supports the principle of identifying additional sites but raises significant concerns over the continued exclusion of sustainable Green Wedge locations without the benefit of a comprehensive review. Land south of Wheelers Hill was assessed through the SHELAA and found suitable in principle, with an 'amber' rating reflecting constraints that can be mitigated through landscape-</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>

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			<p>led design, improved connectivity and sensitive masterplanning. The site is capable of delivering sustainable housing growth while maintaining the visual and physical separation between settlements that underpins Green Wedge policy objectives. Chelmsford's inability to demonstrate a five-year housing land supply underscores the need for greater flexibility within the Plan. However, the Integrated Impact Assessment and additional site selection process apply overly broad conclusions, excluding reasonable alternatives such as this site despite their potential to contribute to housing delivery. Without an up-to-date Green Wedge Review and reassessment of sustainable options, the Draft Local Plan cannot be regarded as positively prepared, justified or consistent with national policy.</p>	<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 Additional Sites consultation 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>
1397877	Marriage Family	ASIIA-25	<p>The Council's approach of seeking to increase the number of new homes the emerging Local Plan (eLP) will deliver above that proposed by the Regulation 19 Addendum is necessary and welcomed.</p> <p>However, the Addendum fails to ensure the eLP will be capable of being found sound, for the reasons set out within this representation.</p> <p>The reasons for this are, in overview, that Addendum's unjustified focus on sites in lower tiers of the settlement hierarchy, contrary to the eLP's own proposed strategy, without justification and leading to a less sustainable pattern of growth than reasonable alternatives.</p> <p>The lack of justification is compounded by defects within the IIA, which fails to properly consider reasonable alternatives and instead presents a false choice between two arbitrarily defined options.</p> <p>We urge the Council to revisit its approach to modifying the Regulation 19 eLP to make it capable of being found sound. The Site (Land at Patching Hall Lane, Broomfield) is a deliverable alternative to many of those proposed by the Addendum. Its allocation for residential development would be</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.</p> <p>The reasons for the selection of Option 1 and the sites identified are set out in the IIA Addendum Report and include accordance with: the Local Plan's Strategic Priorities, Vision, Spatial Principles; the settlement hierarchy; and the presence of an approved Masterplan, and/or planning permission and/or resolution to grant planning permission, demonstrating their deliverability.</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</p>

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			justified, sustainable and consistent with the proposed spatial strategy and spatial principles. Its allocation would contribute to a sustainable, sound, eLP.)	<p>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"> - 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. - 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”. - 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>All sites have been assessed on an equal basis in the Pre-Submission IIA (Appendix M) and the Additional Sites IIA (Appendix C).</p> <p>No change to the IIA.</p>
1394380	Mr Richard Grainger	ASIIA-26	Inadequate roads, schools and doctor facilities to support the proposed developments in Rettendon, East Hanningfield and Bicknacre.	The role of the IIA is to present an assessment of likely significant effects and where opportunities exist for their mitigation in light of proposed policies, and consequently enhancement of their overall sustainability performance.

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				<p>The site assessments within the IIA were undertaken through GIS analysis to ensure consistent treatment. Where a site is selected, the specific requirements of Strategic and Development Management Policies will implement mitigation measures in response to the detailed plans submitted by site proposers.</p> <p>In particular, the provision and capacity of appropriate community infrastructure is a matter for the relevant authority in conjunction with the Council to ensure that adequate provision is made as part of new development, guided by plan policies.</p> <p>No change to the IIA.</p>
1398045	This Land	ASIIA-27	<p>Our concerns are threefold:</p> <ol style="list-style-type: none"> 1. Land at Main Road, Boreham (CFS9) is not incorporated into either Option, despite being rated green and deliverable. 2. It is unclear why some sites are included in Option 1 but others, such as this Site, are excluded. The Site should have been included as part of Option 1 given its suitability, availability, and achievability for fewer than 500 dwellings. 3. The issues largely stem from grouping sites prior to assessment. A more robust appraisal would compare sites individually against sustainability objectives, assessing larger sites both as standalone deliverable options (as is feasible for this Site) and as part of wider strategic growth. 	<p>The reasons for the selection of Option 1 and the sites identified are set out in the IIA Addendum Report and include accordance with: the Local Plan's Strategic Priorities, Vision, Spatial Principles; the settlement hierarchy; and the presence of an approved Masterplan, and/or planning permission and/or resolution to grant planning permission, demonstrating their deliverability.</p> <p>Many other sites score comparatively well in terms of sustainability criteria but are perhaps weaker on other measures such as those identified in the reasoning for the selection of Option 1.</p> <p>All sites have been assessed on a comparative basis, presented within the Addendum (Appendix C) and within the Pre-Submission IIA (Appendix M).</p> <p>No change to the IIA.</p>

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1397209	Mr Sean O'Donnell	ASIIA-29	<p>The document is flawed for a number of reasons. First, it is not reasonable to consider just two options only when other options are possible, such as a mix of smaller development site(s) plus at least one strategic site. Second, the document appears to have pre-determined the outcome that option 1 is the preferred solution as there is a mismatch in the significant detail in the document on the preferred sites compared with much less detail on alternative sites. This makes it difficult to compare like with like and thus unreasonably puts any consultee at a disadvantage. Third, the outcome that option 1 is the preferred solution is worded to suggest that this is clear cut. Yet the basis for this is marginal at best, for example, where there are differences between options 1 and 2, the report identifies that on three aspects only, option 2 "the approach detracts from the achievement of the objective but not significantly" compared with option 1. This is not a strong enough argument to go forward on option 1 only.</p>	<p>The options presented within the Additional Sites IIA Addendum present reasonable alternatives in respect of delivering the development shortfall created by changes to the context of the Replacement Local Plan (RLP). The IIA Addendum is transparent in its scoring of the Options and the reasons for the selection of Option 1 over Option 2, setting out sites which could meet each option and cross-referencing previous Options Assessment work (reproduced in Appendix A).</p> <p>The reasons for the selection of Option 1 and the sites identified are set out in the IIA Addendum Report and include accordance with: the Local Plan's Strategic Priorities, Vision, Spatial Principles; the settlement hierarchy; and the presence of an approved Masterplan, and/or planning permission and/or resolution to grant planning permission, demonstrating their deliverability.</p> <p>The IIA Addendum acknowledges that the differences between the options is not clear-cut but on balance, Option 1 is likely to meet the specific requirement of housing delivery over the short to medium term (i.e. meeting the 5 Year Housing Land Supply target, as set out in para 1.5 of the Additional Sites Regulation 19 Consultation). The inclusion of a strategic site within the proposed mix of smaller sites is less likely to contribute to meeting this specific goal given the relatively long lead-in times associated with the delivery of such sites. In addition, strategic sites form a significant proportion of housing delivery over the medium and long term of the plan period as part of balanced approach to housing delivery.</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"> - 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. - 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”. - 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>All sites have been assessed on an equal basis in the Pre-Submission IIA (Appendix M) and the Additional Sites IIA (Appendix C).</p>

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				No change to the IIA.
1390564	Croudace Homes	ASIIA-30	<p>There appears to be some inconsistency as to the correct housing land supply position. Both paragraph 2.3.1 of the IIA, and paragraph 1.4 of the Focused Consultation document identify the same significant events which have taken place, which have led to the need for the Further Focused Consultation on Additional Sites.</p> <p>The Focused Consultation document identifies that there will be a 4.93 year housing land supply on submission of the Plan without the additional sites. However, paragraph 2.3.2 of the IIA states that, taking account of the above events, and without the additional sites, there is only a projected 3.88 years of housing supply.</p> <p>The identification of 11 additional sites and three expanded housing sites has increased the five year housing land supply by 1,297 units, or 1,592 units over the plan period, enabling the Council to demonstrate a 5.75 year supply on submission. However, this projection is based on the Council's assertion that it would have a 4.93 year supply on submission without these sites. This is where the conflict lies as it is clear from the IIA that the extant supply is as low as 3.88 years.</p>	<p>There is currently a 5YHLS of 3.88 years. Without the additional sites, but taking the Pre-Submission proposed sites and projected 'windfall' planning permissions into account, it is forecast that the 5YHLS will be 4.93 years when the Plan is submitted.</p> <p>Adding the 11 new and 3 expanded sites in the Additional Sites (AS) document to the above, it is forecast that there will a 5YHLS of 5.75 years when the Plan is submitted.</p> <p>No change to the IIA.</p>
308535	Chignal Parish Council	ASIIA-31	<p>The evidence used in the Local Plan to justify development of SGS 18a in the open countryside of Chignal parish is challenged in detail in the Parish Council's comments on the Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum (IIA), Consequently, the IIA scoring is disputed in respect of:</p> <ul style="list-style-type: none"> - Biodiversity and Geodiversity - Housing - Sustainable Living & Revitalisation - Health and Well-being - Transport - Cultural Heritage - Landscape and Townscape 	<p>The role of the IIA is to present an assessment of likely significant effects and where opportunities exist for their mitigation in light of proposed policies, and consequently enhancement of their overall sustainability performance.</p> <p>The site assessments within the IIA were undertaken using GIS analysis to ensure consistent treatment. Where a site is selected, the specific requirements of Strategic and Development Management Policies will implement mitigation measures in response to the detailed plans submitted by site proposers.</p>

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				<p>In particular, the provision and capacity of appropriate community infrastructure is a matter for the relevant authority in conjunction with the Council to ensure that adequate provision is made as part of new development, guided by plan policies.</p> <p>No change to the IIA.</p>
966105	Boreham Parish Council	ASIIA-34	<p>Chelmsford City Council (CCC) announced the need to consult on additional sites because it has stated that more land is needed for homes and employment use to meet future needs and most particularly to meet a shortfall in the 5-year supply due to delays in delivery of other consented sites. This 5-year supply problem is actually only related to housing sites. There is no justification for the addition of the Boreham employment area at site 9a. CCC states it has selected the additional sites following detailed testing of site constraints and opportunities in relation to matters like flood risk, heritage, traffic and archaeology. These sites are being added very late in the process to update the Local Plan. Adding sites at the Regulation 19 stage of the process calls in to question whether the addition of these sites meets the legal criterion of having been “Subject to consultation carried out in accordance with the Council’s Statement of Community Involvement”. Boreham Parish Council does not consider that there has been adequate testing of site constraints or adequate consultation on the additional sites or adequate multi-stage consultation. Boreham Parish Council (the Council) OBJECTS in the strongest terms to the following proposed additional sites in Boreham:</p> <ul style="list-style-type: none"> • Site 9a – Waltham Road Employment Area • Site 9b – Land to the East of 118 to 124 Plantation Road, Boreham • Site 9c – Land to the South of Main Road and Dukes Wood Close, Boreham <p>In the following sections, we highlight several physical and environmental constraints which would prevent the sustainable development of the land at Site 9a, 9b and 9c. The level of harm</p>	<p>The role of the IIA is to present an assessment of likely significant effects and where opportunities exist for their mitigation in light of proposed policies, and consequently enhancement of their overall sustainability performance.</p> <p>The site assessments within the IIA were undertaken using GIS analysis to ensure consistent treatment. Where a site is selected, the specific requirements of Strategic and Development Management Policies will implement mitigation measures in response to the detailed plans submitted by site proposers.</p> <p>In particular, the provision and capacity of appropriate community infrastructure is a matter for the relevant authority in conjunction with the Council to ensure that adequate provision is made as part of new development, guided by plan policies.</p> <p>No change to the IIA.</p>

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			<p>caused due to these constraints cannot be adequately mitigated.</p> <p>The 9b site is also outside the defined settlement boundary of the village. The site is at the far eastern edge of the village and local amenities such as the post office, church and village centre are at sufficient distance to make walking an unattractive prospect for many older residents. It is likely this will contribute additional traffic in the village on roads which are already at or near capacity. The addition of 60 residences for older people in this fairly remote, rural location is likely to add at least 60 cars to the area. Furthermore, the bus service in the village is very limited.</p> <p>Site 9b is also unsustainable due to the lack of provision for enhanced healthcare arrangements. Boreham currently has one practice Surgery and a Pharmacy which can barely cope with local requirements. The proposed development of 60 houses for older residents, likely a mix of couples and singles is likely to add around 100 additional people with healthcare requirements. There is no additional healthcare provision included within plan 9b.</p>	
1301644	Gladman Developments Ltd	ASIIA-36	<p>Gladman raise concerns with the IIA Addendum, in particular the way that credible alternatives, or rather lack of, have been assessed. The IIA presents two options, yet only option 1 is a credible alternative for boosting supply in the early years of the plan. Identification of further strategic sites (500+ dwellings) is unlikely to boost short term delivery and therefore not a reasonable alternative for the purposes of the IIA Addendum. In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, local planning authorities must subject proposals in development plan documents to SA and prepare a report on the findings of the appraisal. No alternatives to the smaller proposed allocations are explored to the list of sites put forward by the Council for assessment. This is a significant failing of the IIA.</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"> - Reasonable alternatives does not include all possible alternatives: the use of the word “reasonable” clearly and necessarily imports

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			<p>In the case of Bicknacre, this is most alarming as Land West of Barbrook Way scores identically to Land East of Main Road promoted by Gladman also in Bicknacre but no assessment of this appears to have taken place nor assessment against each other. This is a flaw of the assessment that needs rectifying.</p>	<p>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.</p> <ul style="list-style-type: none"> - 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”. - 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>A range of development quanta, broad distributions of development and site options available have been tested through the IIA at all stages of plan production. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process.</p> <p>All sites have been assessed on an equal basis in the Pre-Submission IIA (Appendix M) and the Additional Sites IIA (Appendix C).</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 Additional Sites consultation presents a range of sites at various spatial scales</p>

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				<p>which are considered to be capable of meeting the identified development requirements.</p> <p>Paragraphs 2.126 – 2.127 of the Additional Sites Regulation 19 Document note that: <i>“2.126 National Planning Policy requires councils to identify land in local plans to accommodate ten percent of their housing requirement figure on sites no larger than one hectare. This site was identified in the Pre-Submission Local Plan (February 2025) for an allocation for around 20 new homes, to help meet this requirement. This formed part of a larger promoted area.</i> <i>2.127 A larger area is now being proposed to help meet the increased housing requirement and boost housing supply. Allocating this site will help to support existing village services and to maintain a diverse housing supply, with a proportion of homes expected to be delivered within five years.</i></p> <p>No change to the IIA.</p>
1329392	Wates Developments	ASIIA-37	<p>Land East of Boreham - Whilst Wates continues to be supportive of the Pre-Submission Local Plan in principle, Wates are disappointed that at this stage of the Local Plan that the combined promotion Site, set out at Appendix 1, has not been assessed by the Council, as part of the updated SHELAA process, notwithstanding our previous Regulation 18 and 19 submissions, our Concept Masterplan and the pre-application engagement with the Council by Wates.</p> <p>In terms of the Spatial Strategy, Wates are similarly disappointed, that the SA and the IIA have continued to progress a Borough development strategy which does not include any strategic residential growth at Boreham, despite its status as a sustainable Key Service Settlement and its proximity to other major residential and employment allocations, east of Chelmsford.</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 Additional Sites consultation presents a range of sites at various spatial scales which are considered to be capable of meeting the identified development requirements.</p> <p>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</p>

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				<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"> - 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. - 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”. - 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>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.</p> <p>No change to the IIA.</p>

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1397935	Crest Nicholson	ASIIA-39	<p>One matter that has been identified in relation to the IIA is that it has grouped various large sites together but failed to consider sites within these groupings that could come forward independently.</p> <p>The problematic nature of this approach is evident when considering that the reasons for rejection of Option 2 include infrastructure requirements being unproven and the inability for these sites to be relied upon in the first five years of the Plan. However, if these grouped sites were separated, the individual sites, whilst still relatively large could nevertheless contribute to housing within the first five years from adoption of the Plan and which do not require significant infrastructure upgrades that could otherwise be seen as a potential barrier to delivery.</p> <p>These matters appear to largely stem from the way that sites have been grouped before being assessed. A more effective approach, that would ensure a robust appraisal of reasonable alternatives, would be to undertake a comparative appraisal of the various potential sites against the sustainability objectives. This may well identify that a mix of sites, including some that are currently within Option 1 as well as those within Option 2, represents a sustainable and justified approach.</p> <p>In such an appraisal, it would be important to assess the larger sites as both standalone sites (where this is deliverable, as is the case with the Site (Warren Farm Phase 2) and, separately, as part of a larger strategic growth in combination with other sites (again, where a such a strategic approach is deliverable).</p> <p>The judgment in Cogent makes clear that the Strategic Environmental Assessment (in this case named the IIA) is an iterative process, and defects in earlier stages can be resolved at the later stage (even at very late stage in the process). The issues identified in the IIA can thus be revisited in terms of the appraisal of alternatives in order to negate potential issues in respect of compliance with the Strategic Environmental</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.</p> <p>The reasons for the selection of Option 1 and the sites identified are set out in the IIA Addendum Report and include accordance with: the Local Plan's Strategic Priorities, Vision, Spatial Principles; the settlement hierarchy; and the presence of an approved Masterplan, and/or planning permission and/or resolution to grant planning permission, demonstrating their deliverability.</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"> - 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.

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			<p>Assessment Regulations, as well as ensure the emerging Local Plan is justified and consistent with national policy.</p>	<ul style="list-style-type: none"> - 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”. - 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>All sites have been assessed on an equal basis in the Pre-Submission IIA (Appendix M) and the Additional Sites IIA (Appendix C).</p> <p>No change to the IIA.</p>
1327864	Martin Grant Homes	ASIIA-40	<p>The Pre-Submission Integrated Impact Assessment (January 2025) discounts a higher growth scenario on the basis it “was not available in sufficient time for consideration through this report”. The Integrated Impact Assessment (IIA): Focused Consultation Additional Sites (Regulation 19) Addendum (November 2025) does not consider this “higher growth” scenario further despite the time that has now passed since the new standard method calculation came into effect. We therefore remain concerned the Council has not considered a strategy which could, as a minimum, meet the area’s objectively assessed needs. Based on the evidence base, there are other site which are considered suitable (i.e. Land at Little Fields, Danbury) which should be allocated to reduce the deficit between the housing requirement and minimum housing needs.</p> <p>The Site is only referenced in the IIA Addendum in the assessment of SHELAA sites. No justification is provided as to why it is not proposed for allocation, nor does there appear to be any consideration for it alone or as a package of sites as a</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"> - 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

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			<p>reasonable alternative. The level of growth for Danbury instead appears to be considered as constant at 100 dwellings, based on the Neighbourhood Plan position (as discussed above).</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>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>The IIA considers a scenario of 1,406 dwellings per annum (which is below minimum housing needs under the December 2024 standard method) but assesses this on the basis of a particular selection of strategic-scale sites only. The scenario is discounted on the basis of these sites, rather than the quantum of growth.</p> <p>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>The discounting of a ‘high growth’ scenario based on consideration of one selection of sites only is not justified.</p> <p>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>Additionally, the conclusion of the IIA which state the high growth scenario would “perform more poorly overall” due to</p>	<p>decision-making authority, subject to challenge only on conventional public law grounds.</p> <ul style="list-style-type: none"> - 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”. - 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>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.</p> <p>No change to the IIA.</p>

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			<p>“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>	
1392184	M Scott Properties	ASIIA-41	<p>There are a number of concerns with these conclusions and the purported justification for selecting Option 1.</p> <p>Firstly, it appears to treat all sites within Option 1 as being of equal sustainability and applies blanket conclusions to a basket of sites of varying characteristics, located in various parts of the authority, and providing extensions to different settlements at various positions in the settlement hierarchy.</p> <p>Clearly there are some sites within Option 1 that contribute significantly less than others to these objectives. Similarly, and perhaps of more relevance, there are sites that have been included within Option 2 that contribute better to the DLP’s proposed Strategic Priorities, Vision and Spatial Principles. We also therefore at this point reiterate Scott Properties previous representations which proposed updates to Strategic Policy S1 to direct development to all higher order settlements, as opposed to only those outside of the Green Belt.</p> <p>The conclusion that smaller sites are inherently in accordance with the settlement hierarchy, whilst those in Option 2 are not, is entirely spurious. Sites within Option 1 include those in less sustainable locations or with overall lower SHELAA scores than sites discounted with the dismissal of Option 2, or due to their location within the Green Belt.</p>	<p>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 Additional Sites consultation 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"> - Reasonable alternatives does not include all possible alternatives: the use of the word “reasonable” clearly and necessarily imports

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				<p>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.</p> <ul style="list-style-type: none"> - 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”. - 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>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.</p> <p>No change to the IIA.</p>
311148	Essex County Council	ASIIA-42	<p>The IIA correctly identifies that additional site allocations will increase pressure on existing Green Infrastructure (GI) but also create opportunities to expand and enhance GI networks through masterplanning and site design. Retention of Chelmsford’s Green Wedge is a positive measure, safeguarding strategic GI corridors and supporting ecological connectivity. However, the assessment notes minor to significant negative effects on biodiversity for several sites, particularly where priority habitats or high-grade agricultural land are affected. This</p>	<p>Support for retention of the Green Wedge as an important policy measure in helping to guide the distribution of development is welcomed. The identification of negative effects in respect of biodiversity and land use reflects a reasonable anticipatory approach which is the role of the IIA process, against which the provisions within Site and Development Management policies can be applied. This includes mitigation measures such as BNG.</p>

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			reinforces the need for robust mitigation and measurable Biodiversity Net Gain (BNG) delivery.	No change to the IIA.
1380259	Bucknell Family	ASIIA-43	We consider that the approach that has been taken to the allocation of additional sites has not taken a positive opportunity to make sufficient allocations to genuinely reflect the actual development needs of the community, including those of the small and medium sized local business operators. This was the ideal opportunity for the Council to revisit its strategy and consider the inclusion of appropriate small scale employment sites in the Green Wedge, especially those such as Regiment Park which will actually strengthen the functionality of a large part of the Green Wedge through the release of a small parcel of land which does not contribute strongly to the main purposes of the Green Wedge. This is an obvious opportunity for increased flexibility in the new Local Plan and the delivery of additional employment land. It is therefore considered that the additional sites allocation process is not appropriate, justified or positively prepared, nor does it reflect the national policy position that the plan should be prepared with the objective of contributing to the achievement of sustainable development.	<p>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 Additional Sites consultation 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>
1396287	Vistry Strategic Land	ASIIA-44	Land South of Writtle and North of the A414 - The sustainability credentials of Writtle are clear and more so than the lower tier settlements of Ford End, Rettendon Place and Woodham Ferrers. The IIA that has been prepared in support of both the Pre-Submission Local Plan and this Focused Consultation has been done so on the basis of a fundamentally flawed approach to its assessment of the Green Belt that exists within the District, and of the settlements situated within the Green Belt. That flawed approach stems entirely from the City Council discounting options for any form of sustainable development at settlements within the Green Belt at an early stage based on the available evidence. The available evidence of course does not include any Green Belt Review, and the IIA has been progressed without being able to assess options on any land within the Green Belt that extends across 36% of the City	<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 Additional Sites consultation presents a range of sites at various spatial scales</p>

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			<p>Council's area. So, as with the draft Local Plan itself, the IIA only represents a partial picture of the opportunities for sustainable patterns of growth that exist in Chelmsford, with Writtle perhaps being the most obvious example where both the draft Plan and its accompanying IIA have overlooked a settlement which is demonstrably far more sustainable than the three settlements highlighted above. The key aspects of greater sustainability for the settlement of Writtle, and specifically for this site, are described in the following paragraphs.</p>	<p>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"> - 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. - 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". - 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."

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				<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.</p> <p>No change to the IIA.</p>
1396287	Vistry Strategic Land	ASIIA-45	<p>Skeggs Farm - The sustainability credentials of the site is clear and more so than the proposed allocations at the lower tier settlements of Ford End, Rettendon Place and Woodham Ferrers. The IIA that has been prepared in support of both the Pre-Submission Local Plan and this Focused Consultation has been done so on the basis of a fundamentally flawed approach to its assessment of the Green Belt that exists within the District, and of the settlements situated within the Green Belt. That flawed approach stems entirely from the City Council discounting options for any form of sustainable development within the Green Belt at an early stage based on the available evidence. The available evidence of course does not include any Green Belt Review, and the IIA has been progressed without being able to assess options on any land within the Green Belt that extends across 36% of the City Council's area. So, as with the draft Local Plan itself, the IIA only represents a partial picture of the opportunities for sustainable patterns of growth that exist in Chelmsford, with land parcels to the south-west of the Chelmsford Urban Area, including Writtle, perhaps being the most obvious examples where both the draft Plan and its accompanying IIA have overlooked locations which are demonstrably far more sustainable than the three settlements highlighted above.</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 Additional Sites consultation 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</p>

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				<p>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"> - 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. - 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”. - 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>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.</p> <p>No change to the IIA.</p>

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1249937	Natural England Consultations Team	ASIIA-47	We note that the HRA Report Addendum presented in Appendix F of the IIA considers the proposed changes arising from the publication of the Council's Focused Consultation Additional Sites (Regulation 19) Document. The HRA Addendum concludes that the proposed changes to the Local Plan do not affect the findings of the previous HRA work (presented in Appendix N of the Pre-Submission IIA Report) and that the Local Plan will not have adverse effects on any European sites either alone or in combination. Natural England will be able to support this conclusion once all the additional site allocations with the Zone of Influence for Essex RAMS have been acknowledged and appropriate requirements included within the relevant site allocation policies, in line with our advice above.	Support for the conclusions of the HRA is acknowledged. Requirements for RAMS contributions is set out in policies S4 and DM16 in the Pre-Submission Local Plan. It is not included within individual site allocation policies to avoid repetition. No change to the HRA.
1397946	Barratt David Wilson	ASIIA-48	BDW is generally supportive of the Council's approach to growth and its approach to meeting its housing requirements in a sustainable way, building upon what has already been achieved through the adopted Local Plan, and continuing the allocations of Strategic Growth Sites 3b, 3c and 3d. However, the Council is proposing some Additional Sites which no longer support a sustainable pattern of development and do not comply with the policies set out in the December 2024 NPPF.	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. No change to the IIA.
1326599	Dandara	ASIIA-49	<p>Growth Site 14b Ford End</p> <p>Dandara welcomes the measures taken by the Council since the previous Regulation 19 consultation to enhance its five-year housing land supply position, including the uplift in the amount of development planned at Growth Site 14b. Increasing the number of new homes allocated at the site will provide a further boost to five-year land supply whilst enhancing the community benefits that can be delivered and the resilience of the allocation. Dandara confirms its intention to deliver the site within five years.</p> <p>2.30 Whilst Dandara supports the broad thrust of Strategic Policy S7's approach, it objects to the justification for a new settlement to the East of Chelmsford, taking account of the reasonable alternatives. These include the allocation of further urban extensions on the edge of the urban area.</p>	Support for the proposed allocation is noted. 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 Additional Sites consultation presents a range of sites at various spatial scales which are considered to be capable of meeting the identified development requirements. 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

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			<p>2.31 Dandara’s concerns are exacerbated by the reliance of the Spatial Strategy on Junction 19 of the A12. This is a significant deliverability risk, due to the Government’s decision to cancel planned improvements to the A12 that would have delivered required capacity. The Local Plan’s traffic modelling concludes that the full improvements that were proposed to Junction 19 are required as a minimum to deliver the strategic growth expected by the Local Plan. Whilst discussions are on-going with National Highways to look at options for a phased approach to works to the junction to support the proposed Local Plan growth, but no outcome has yet been reached.</p> <p>2.32 Furthermore, the evidence base supporting the draft Plan has not been sufficiently updated to justify the decision to allocate Hammonds Farm in favour of other options that are better connected to existing services. The Integrated Impact Assessment (IIA) supporting the previous Regulation 19 consultation did not assess the potential benefits of further allocations north of South Woodham Ferrers, nor of smaller sites adjacent to existing higher order settlements. It stated simply at 6.4.41 that: <i>“It was not considered appropriate to try to meet the remaining residual needs through a selection of additional small sites. Over 90 small sites were submitted for consideration for development. More than half have been discounted because they are in the Green Belt or Green Wedge. Many other sites are unsuitable for a number of reasons, such as due to not meeting other Local Plan policies on a wide range of issues, being in an unsustainable location, being distant from defined settlements, or other factors including topology. A number of smaller site allocations are allocated but attempting to meet residual needs would not be feasible due to the lack of site supply. Even if this could be accommodated, it would not be a balanced strategy. While the smaller sites could potentially deliver faster than the large scale sites, they would not deliver the same benefits in terms of new or improvements to existing community services and facilities. Some of the smaller sites being allocated form part of a larger promoted area, where a larger allocation may not be appropriate for the</i></p>	<p>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"> - 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. - 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”. - 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>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.</p> <p>No change to the IIA.</p>

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			<p><i>settlement due to issues such as access, surrounding density and character, along with not helping the Council to meet the 10% small sites target.”</i></p> <p>2.33 The update to IID supporting the Additional Sites consultation does not do so either. It only assesses the option of allocating a single strategic site or sites) as a reasonable alternative. It does not assess the potential benefits of alternative smaller sites or of allocating further smaller sites to boost housing supply further. It must do so before the Plan can be found sound.</p>	
1326599	Dandara	ASIIA-50	<p>Our response supports the proposed allocation of Strategic Growth Site 18a at North West Chelmsford (land north of Hollow Lane) for around 100 dwellings. Dandara controls this land and confirms that it is available, suitable and deliverable as anticipated by Strategic Growth Site Policy 18a. It is submitting supporting information alongside these representations to help verify this position, including a newly prepared masterplan and Vision Document copied at Appendix 1.</p> <p>1.3 Dandara is continuing to highlight the opportunity presented by its wider holding at North West Chelmsford, which could deliver up to 850 dwellings in total. Allocating the land in full would boost housing land supply on an easily deliverable and sustainable site and enhance the resilience of the Plan. Taking account of the risks associated with the wider spatial strategy adopted by the Council and our concerns about the soundness of policy S6 and S7, we believe this is a necessary amendment.</p> <p>1.4 Whilst Dandara welcomes the measures taken by the Council since the main Regulation 19 consultation to enhance its five-year housing land supply position, including the proposed allocation of its land north of Hollow Lane, it has remaining concerns about the soundness of the Plan in respect of:</p> <ul style="list-style-type: none"> ● Insufficient housing supply allocations to ensure that the Plan’s housing requirement is met in full, taking account of the limited buffer proposed. 	<p>Support for the proposed allocation at Hollow Lane is noted.</p> <p>The options presented within the Additional Sites IIA Addendum present reasonable alternatives in respect of delivering the development shortfall created by changes to the context of the Replacement Local Plan (RLP). The IIA Addendum is transparent in its scoring of the Options and the reasons for the selection of Option 1 over Option 2, setting out sites which could meet each option and cross-referencing previous Options Assessment work (reproduced in Appendix A).</p> <p>The reasons for the selection of Option 1 and the sites identified are set out in the IIA Addendum Report and include accordance with: the Local Plan’s Strategic Priorities, Vision, Spatial Principles; the settlement hierarchy; and the presence of an approved Masterplan, and/or planning permission and/or resolution to grant planning permission, demonstrating their deliverability.</p> <p>A range of development quanta, broad distributions of development and site options</p>

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			<ul style="list-style-type: none"> • Over optimistic assumptions about the likely delivery timeframes for the draft Plan's main allocation - the 3,000 new homes expected to come forward at Hammonds Farm. • Significant risks associated with the delivery of a new settlement at Hammonds Farm, including the substantial upfront highways and other infrastructure required to enable the development to come forward and the risks presented by the Government's decision to cancel planned A12 upgrades. • The justification for the allocation of a new settlement east of Chelmsford compared with the reasonable alternatives, including further allocations to the west and north-west of Chelmsford. 	<p>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.</p> <p>No change to the IIA.</p>
1326599	Dandara	ASIIA-51	<p>Dandara's site to the west of Willow Grove at South Woodham Ferrers presents an untapped opportunity to help address these issues. It could deliver up to 200 dwellings on an easily deliverable site, within five years, in a highly sustainable location just 15 minutes' walk from South Woodham Ferrers train station. It was assessed very positively in the SHLAA, yet it is not proposed for allocation. A concept masterplan and Vision Document is submitted alongside these representations to demonstrate how it would provide a logical extension to South Woodham Ferrers urban area and Strategic Growth Site 10 immediately to the east, which is already allocated in the adopted Local Plan.</p> <p>The update to the IIA supporting the Additional Sites consultation only assesses the option of allocating a single strategic site or sites as a reasonable alternative. It does not assess the potential benefits of alternative smaller sites or of allocating further smaller sites to boost housing supply further.</p> <p>Dandara's land west of Willow Grove does not therefore appear to have been properly considered, despite it having been assessed positively in every category (SHELAA site 20SHELAA3 and 21SHELAA4).</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"> - 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. - 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".

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				<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.</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 Additional Sites consultation 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>
1303557	Obsidian Strategic	ASIIA-52	Obsidian Strategic controls approximately 9.2 hectares (22.6 acres) of land west of Galleywood Road, on the south-eastern edge of Chelmsford’s urban area. The land lies directly adjacent to Great Baddow High School and its allocation for development in the emerging Local Plan would present a unique opportunity to help address Chelmsford’s Housing Crisis in a highly sustainable location, whilst supporting the future expansion and enhancement of educational facilities at Great Baddow High School.	<p>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,</p>

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			<p>We are urging the Council to reconsider its blanket approach to ruling out the opportunity to deliver sustainable development in the Green Belt and to carefully consider the unique set of benefits that would be afforded by allowing the release of land in Great Baddow.</p>	<p>including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Additional Sites consultation 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"> - 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. - 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”. - 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

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				<p>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.</p> <p>No change to the IIA.</p>
1360942	Alan and Jennifer Swash	ASIIA-54	<p>Waltham Road Employment Area (Growth Site 9a) The IIA is completely silent on any possible negative impacts upon nearby residential properties, including our own property, and states that” Growth Site Policy 9a contains appropriate mitigation measures to be applied to development.” In this respect, the IIA is flawed through its clear and obvious failure to assess any possible impacts upon nearby residential properties, and we object to the IIA on that basis.</p>	<p>The IIA, reflecting its legal remit and associated guidance, does not take account of the likely effects of development on residential receptors. Matters of residential amenity are considered through Strategic and Development Management Policies within the Local Plan against submitted site proposals.</p> <p>No change to the IIA.</p>
1397696	Mr and Mrs Simon and Susan Polley	ASIIA-55	<p>The evidence used in the Local Plan to justify development of SGS 18a in the open countryside of Chignal parish is challenged in detail in the Parish Council’s comments on the Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum (IIA), Consequently, the IIA scoring is disputed in respect of:</p> <ul style="list-style-type: none"> - Biodiversity and Geodiversity - Housing - Sustainable Living & Revitalisation - Health and Well-being - Transport - Cultural Heritage - Landscape and Townscape 	<p>The role of the IIA is to present an assessment of likely significant effects and where opportunities exist for their mitigation in light of proposed policies, and consequently enhancement of their overall sustainability performance.</p> <p>The site assessments within the IIA were undertaken using GIS analysis to ensure consistent treatment. Where a site is selected, the specific requirements of Strategic and Development Management Policies will implement mitigation measures in response to the detailed plans submitted by site proposers.</p> <p>In particular, the provision and capacity of appropriate community infrastructure is a matter for the relevant authority in conjunction with the</p>

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				<p>Council to ensure that adequate provision is made as part of new development, guided by plan policies.</p> <p>No change to the IIA.</p>
310453	Mr Neil Hawes	ASIIA-56	<p>I object to the proposed development on the following grounds. From simple searches on Google there is a mind blowing amount of development around Ford End with the lack of relevant infrastructure.</p> <p>I am unable to see any plans for new doctors surgeries to support the Parish of Great Waltham and with the Government recently scraped the new hospital at junction 7a on the M11. Broomfield hospital is already at full stretch. With the vast numbers of homes being built around Maldon, Danbury Chelmsford and Dunmow the Hospital will be overrun with patients.</p> <p>Beaulieu Park is producing 3600 homes, Channels 2500 homes, there are another 38 homes being built in Felsted. 800 new homes are proposed just south of the Race Course and more to the East of the A131 Great Leighs. Just North of Ford End over 200 homes are being proposed by Uttlesford Council opposite North End and the Butchers Arms Pub. Further to this the Woodlands Park development in Great Dunmow has 769 homes, however upon closer inspection of the Great Dunmow Town Council development plan there is a proposal to build a further 2019 homes, taking the total for Great Dunmow to 2788. The reality is this means that there are 8126 that have been or will be built within a 5 mile radius of Ford End. If you double that radius to 10 miles, it captures the proposed 5000 new homes on the former RAF Wethersfield site. (now housing 1200 asylum seekers.) A recent traffic survey conducted on the B1008 through Ford End, showed a 35.9% increase in traffic from 2021. With the above an increase in housing surrounding Ford End and further development of this small village, further substantial increase in vehicles will pass through our village going between the A120 and Chelmsford. Lorries using the</p>	<p>The observations on the extent of surrounding development, service provision, traffic levels, biodiversity, site development scale and land use quality are noted. The IIA takes into account matters of biodiversity, service provision, traffic generation and land quality, scoring neutral for biodiversity, mixed positive/negative for sustainable living and negative for land use, reflecting the scale of the site. A detailed site survey would be required to be determine the precise land use Grade. Site-specific policy takes account of and address the sustainability scoring.</p> <p>No change to the IIA.</p>

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			<p>A131 to bypass the villages puts at least an extra 20 miles on the journey, which they say increases their carbon footprint.</p> <p>The original plan for Ford End was for 20 homes, suddenly Dandara the chosen developer, has held a local consultation for more than double to 50 houses. Now we find that the council want to increase that number to 75 which will increase the size of our village by more than a half.</p> <p>Building on the land will disrupt the transient movement and feeding areas of deer and badgers that can be regularly seen at night crossing the road and throughout the village.</p> <p>This proposed development (Ford End) is on prime grade 2 agricultural land. During the First World War, the UK had food security for 6 weeks, now we can only boast security for 6 days. If you keep building on agricultural land you are reducing the ability of UK food production, raising costs of food and making us more reliant on imported food along with the increase in the carbon footprint. Within 10 years over 15% of farmland will have been built over.</p>	
1398025	Mrs and Mrs Stainton and Mrs Heather Smith	ASIIA-57	<p>The evidence used in the Local Plan to justify development of SGS 18a in the open countryside of Chignal parish is challenged in detail in the Parish Council's comments on the Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum (IIA), Consequently, the IIA scoring is disputed in respect of:</p> <ul style="list-style-type: none"> - Biodiversity and Geodiversity - Housing - Sustainable Living & Revitalisation - Health and Well-being - Transport - Cultural Heritage - Landscape and Townscape 	<p>The role of the IIA is to present an assessment of likely significant effects and where opportunities exist for their mitigation in light of proposed policies, and consequently enhancement of their overall sustainability performance.</p> <p>The site assessments within the IIA were undertaken using GIS analysis to ensure consistent treatment. Where a site is selected, the specific requirements of Strategic and Development Management Policies will implement mitigation measures in response to the detailed plans submitted by site proposers.</p> <p>In particular, the provision and capacity of appropriate community infrastructure is a matter for the relevant authority in conjunction with the</p>



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				Council to ensure that adequate provision is made as part of new development, guided by plan policies. No change to the IIA.