HS014

GLADMAN

Chelmsford Local Plan Review 2022-2041

Examination

Matter 1: Legal and Procedural Requirements

October 2026

Stakeholder number: 1301644

Comment ID numbers: PSQ25-6309, PSQ25-6313, PSQ25-6314, PSQ25-6315, PSQ25-6316, PSQ25-6317, PSQ25-6318, PSQ25-6319, PSQ25-6320, PSQ25-6321, PSQ25-6322, PSQ25-6323, PSQ25-6324, PSQ25-6325, PSQ25-6326, PSQ25-6327, AS-993, AS-994, AS-995, AS-996, AS-997.

Word count: 304

ISSUE 1 – WHETHER THE PLAN HAS BEEN INFORMED BY A SUSTAINABILITY APPRAISAL

1.1 Is it clear how the preparation of the Plan and its policies have been informed by the Sustainability Appraisal (Integrated Impact Assessment January 2025 (SD008) and Integrated Impact Assessment: Additional Sites (Regulation 19) Addendum November 2025 (SD009)) at each stage and how mitigation measures have been dealt with?

1.1.1 Gladman's concerns at the initial Regulation 19 stage are clearly set out within our Regulation 19 response, it is important to distinguish these from the Additional Sites consultation from earlier this year.

1.2 Do the Sustainability Appraisals robustly test the Plan against reasonable alternatives for the allocated sites for housing, employment and retail and other types of development?

1.2.1 No, through our previous Regulation 19 representations Gladman raised issue with the insufficient testing of reasonable alternatives.

1.2.2 Likely negative significant effects are identified for development at Hammonds Farm, reliant on mitigation and suitable policies and wording within the Local Plan to address, whereas there are alternative sites and locations that will not require such an approach which have been excluded from further consideration. This will be explored in response to question 1.3 below.

1.3 What alternative options were considered, which were discounted and were the reasons for this clear?

1.3.1 No, the reasoning for discounting of some options is not clear, particularly in relation to Option 3 of potential spatial strategies. This is the only option that would meet full

needs as determined by the NPPF 2024 but is discounted for performing more poorly overall.

1.3.2 Testing a greater range of options for meeting NPPF 2024 levels of housing may have determined that this option was preferable, for example scenarios that excluded Hammonds Farm whilst meeting full needs.