

Chelmsford Local Plan Issues and Options Consultation Document

Sustainability Appraisal Report and Habitats Regulations Assessment Initial Scoping - Feedback Report

1. Introduction

1.1 Chelmsford Local Plan Issues and Options Consultation Document

The Chelmsford Local Plan (Local Plan) will be a new single planning policy document. It will set out how much new development will be accommodated in Chelmsford City Council's Administrative Area out to 2036 and where this growth will be located. It will also contain planning policies and land allocations.

As part of the preparation of the Local Plan, Chelmsford City Council (the Council) prepared an Issues and Options Consultation Document setting out the planning issues that face Chelmsford over the next 15 years and options for the way they could be addressed. The key elements of the document included:

- ▶ Spatial Principles (the high level objectives that guide the approach to the Local Plan);
- ▶ Housing Target Projections (options relating to how many houses should be built up to 2036);
- ▶ Employment Target Projections (options relating to how many jobs should be supported up to 2036); and
- ▶ Spatial Options (options relating to where new development should go).

Consultation on an Issues and Options Consultation Document took place over a nine week period between 19th November 2015 and 21st January 2016.

1.2 Sustainability Appraisal Report

The Council is required to carry out a Sustainability Appraisal (SA) of the Local Plan¹. SA is a means of ensuring that the likely social, economic and environmental effects of the Local Plan are identified, described and appraised and also incorporates a process set out under a European Directive² and related UK regulations³ called Strategic Environmental Assessment (SEA). SA is an iterative process and in this context, Amec Foster Wheeler Environment and Infrastructure UK Ltd (Amec Foster Wheeler) carried out an appraisal of the Issues and Options Consultation Document, focusing the key plan elements listed in **Section 1.1**.

¹ The requirement for SA of local plans is set out under section 19(5) of the Planning and Compulsory Purchase Act 2004.

² Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.

³ Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633).

The findings of the SA were presented in a SA Report that was published for consultation alongside the Issues and Options Consultation Document in November 2015.

1.3 Habitats Regulations Assessment Initial Scoping

The Conservation of Habitats and Species Regulations 2010 (as amended) also requires local authorities to assess the potential impacts of land use plans on the Natura 2000 network of European protected sites to determine whether there will be any likely significant effects as a result of the plan's implementation. This process is known as Habitats Regulations Assessment (HRA).

The HRA screening exercise will be undertaken once the preferred Local Plan options have been identified and policies drafted. In advance of this exercise, Amec Foster Wheeler prepared a HRA Initial Scoping document detailing the proposed approach to the HRA of the Local Plan. This document is intended to establish the baseline and provides background for discussions with Natural England regarding the scope and methodology of the HRA of the Local Plan.

The HRA Initial Scoping document was issued to Natural England for consultation in November 2015.

1.4 This Feedback Report

This Feedback Report provides a summary of the consultation responses received to the SA Report and HRA Initial Scoping document. It is structured as follows:

- ▶ **Section 2:** provides an overview of the responses received and the main issues raised by respondents;
- ▶ **Section 3:** contains a schedule of responses relating specifically to the SA Report;
- ▶ **Section 4:** contains a schedule of responses made to the SA Report but concerning the Local Plan;
- ▶ **Section 5:** summarises Natural England's response to the HRA Initial Scoping document.

2. Consultation Overview

2.1 Responses

A total of 106 responses were received from 104 respondents to the Issues and Options SA Report and its Non-Technical Summary. **Table 2.1** and **Table 2.2** provide a breakdown of the type of respondent and how the comments were made. Of these responses, 26 related specifically to the SA Report (see **Section 3**) with the remainder concerning wider planning issues of relevance to the Local Plan (see **Section 4**). In addition, Natural England provided a response to the HRA Initial Scoping document (see **Section 5**).

Table 2.1 Type of SA Issues and Options Consultation Respondent

Type of Respondent	Number of Respondents*
Parish/Town Councils or adjoining local authorities	5
Developers or Representatives	19
Other Agencies and Authorities	18
Members of the public	79

*Note, the total in Table 2.1 (121) is greater than the total number of respondents (104) as some types of respondents fall into multiple groups and are therefore double counted.

Table 2.2 Method of making Comments to the SA Issues and Options Consultation

Method of Making Comments	Number of Respondents
Online Consultation Portal	17 (16 %)
Email/Electronic Form	28 (27 %)
Paper Form/Letter	59 (57 %)

2.2 Main Issues Raised

SA Report

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

- ▶ Reasonable alternatives to the Spatial Options considered in the SA Report including a proposed new settlement option at Hammonds Farm;
- ▶ The treatment of Green Wedges in the SA;
- ▶ The findings of the appraisal of the Spatial Options with specific regard to the identification of the best performing options;
- ▶ The findings of appraisal of the Spatial Options against SA Objective 4 (To promote urban renaissance and support the vitality of rural centres, tackle deprivation and promote sustainable living') specifically;
- ▶ The need to ensure that the mitigation identified in the SA Report (and subsequent SA Reports) is refined and taken into account in developing the Local Plan;
- ▶ Lack of differentiation between the Spatial Options considered in the SA Report;
- ▶ The potential environmental effects of higher housing provision.

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

HRA Initial Scoping

The main issues raised by Natural England in their response to the HRA Initial Scoping document relate to:

- ▶ The proposed spatial scope of the HRA;
- ▶ Datasets and ongoing studies that could inform the HRA;
- ▶ Sites to be 'screened out' of the HRA;
- ▶ The initial assessment of effects on European sites and with specific regard to coastal squeeze, water quality, water supply and recreational pressure.

It is the Council's intention to discuss these matters with Natural England prior to undertaking the HRA screening exercise.

A detailed summary of Natural England's response to the HRA Initial Scoping document is contained in **Section 5**.

3. Schedule of Responses Relating Specifically to the Sustainability Appraisal Report

Ref	Consultee	Issue	Consultee Response Summary
1 (SA42)	Terence O'Rourke (on behalf of Hammonds Estates)	Reasonable Alternatives	<ul style="list-style-type: none"> Raises concerns how a new settlement option based at Hammonds Farm has been treated and discounted in Section 1.4 of the Report. Suggests that the rationale for discounting the site is inconsistent with the treatment of other sites included within the three spatial options considered within the Issues and Options SA Report. Suggests that it is unreasonable for the Council to use the provision of a possible new A12 junction to question the viability and deliverability of the Hammonds Farm proposal (and thereby supporting the justification of its exclusion) if elsewhere the SA has highlighted that developer contributions could support the investment in highway improvements which would help to mitigate the adverse effects. It suggests that the issue is reconsidered to ensure an approach that is consistent between option locations. In response to issues raised concerning deliverability in the SA Report, the consultee notes that the delivery rate of the site could be increased through the involvement of multiple contractors working across phases simultaneously. Also states that the suggestion that all development associated with a new settlement must be deliverable within a single plan period is considered illogical and raises inconsistencies with the Councils' approach to the identification of other locations for growth in its spatial options. Suggests that there is no evidence provided by the Council to justify why sites capable of delivering more than 3,000 homes should be discounted from any consideration at this stage, because "they would be difficult to deliver in the plan period". Requests that the Council consider an option of a new settlement at Hammonds Farm which, consistent with case law, could be described as reasonable and should be included within the SA process. Proposes a fourth spatial option which includes an 'urban focus' as per the other spatial options assessed but is based around growth in key transport corridors including the A12 and the Hammonds Farm site. The consultee has assessed this fourth option using the SA Framework. Their findings suggest that the fourth option could score similarly, and potentially better in some categories, in a SA context to the three options considered in the SA Report. Suggests that the SA score of the site supports the conclusion that it was inappropriate for the Council to exclude the Hammonds Farm site from further consideration.
2 (SA75)	Strutt & Parker LLP on behalf of Van Diemens Property Company	Reasonable Alternatives/Green Wedges	<ul style="list-style-type: none"> Considers that the appropriateness and sustainability of the inclusion of Green Wedges within the new Local Plan is a matter that must be appropriately considered through the plan-making process, including through SEA/SA. States that it is not appropriate for policies from the extant Development Plan to be simply carried forward into the new Local Plan without due consideration. It would be inappropriate for potential policies / options for inclusion in the new Local Plan to be assessed against policies from the plan which it will replace. Is concerned that the current approach being taken in respect of Green Wedges in the SA could result in sites that are on land currently allocated as Green Wedge from being rejected without proper consideration, regardless of their sustainability and appropriateness for development. This could constitute a failure to consider reasonable alternatives as part of the plan-making process as required by the SEA Regulations. States that the SA Report appears to assess options against current Green Wedge allocations, rather than assessing Green Wedge allocations themselves. Raises concern that this could result in reasonable alternatives that happen to be on land allocated as Green Wedge not being appropriately assessed, undermining the soundness of the Plan and potentially its compliance with the Environmental Assessment of Plans and Programmes Regulations (2004). Urges the Council to review its current approach vis-à-vis the SA and Green Wedges to ensure problems do not arise later in the plan-making process.

Ref	Consultee	Issue	Consultee Response Summary
			<ul style="list-style-type: none"> States that one could infer that sites within the Green Wedge are not considered to have the potential to be allocated. Would welcome confirmation that this is not the case.
3 (SA36)	Sellwood Planning on behalf of Crest Nicholson	General	<ul style="list-style-type: none"> Considers that the SA Report is a thorough and generally robust document.
		Appraisal: Spatial Options	<ul style="list-style-type: none"> Considers that Table 5.4 contains an error against SA Objective 4 with regards to Option 1 and 2. Both options are assessed as significant positive with some negatives in the text but are indicated in the table as ++/- and ++ respectively. These scores should be amended to reflect an equal score for both options. Also considers that insufficient weight is given to the suggestion that larger urban extensions, as proposed in Option 1, will be able to contribute to higher levels of infrastructure funding than smaller urban extensions, such as Option 2. As such, it is suggested that Option 1 can contribute more to SA Objective 4 than Option 2.
4 (NTS6)	Historic England	Approach to the SA	<ul style="list-style-type: none"> Suggests that guidance on the SEA / SA process (Historic England – Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment 2013) may be of interest to the SA Report. States that, when taking forward further work on the implications of the three spatial options considered, the development of a topic based approach, focused on the historic environment is recommended.
5 (SA 38)	Turley on behalf of Richborough Estates	General	<ul style="list-style-type: none"> Generally supports the SA undertaken and the use of SA objectives to appraise the development options. The conclusion from the SA that housing growth of 930 homes per annum is the best performing option is also supported.
		Appraisal: Spatial Options	<ul style="list-style-type: none"> Suggests that further consideration should be given, in identifying the preferred spatial option, to the availability/deliverability of sites to provide a wide range of housing across the market. While the SA considers whether the spatial options can meet housing need, it does not consider how and when this would be. To this end, it is suggested that further consideration of housing need and delivery should be undertaken to ensure the appraisal considers which options could be delivered in a timely fashion, particularly given the historic shortfall of land supply for development in Chelmsford. States that if this analysis was undertaken, Option 3 would be shown to be the best performing option and should be pursued.
6 (SA 52)	Iceni Projects on behalf of Cogent Land LLP	Appraisal: Spatial Options	<ul style="list-style-type: none"> Disagrees with the findings of the SA and considers that Spatial Option 3 is the most sustainable approach to accommodate growth for the reasons set out below: Option 1 lacks the necessary infrastructure to cope with the level of growth required, both in terms of the appropriate investment in infrastructure where it is needed to provide the necessary levels of transport connectivity and access to local services. In addition, the focus of such a large amount of development in a single area presents issues of deliverability, particularly with regards to potential market saturation slowing the release of housing. It is important to distribute development across the borough to ensure that it is capable of appealing to difference sectors of the potential market, allowing more certainty on delivery. Also, and as acknowledged, development on smaller previously developed sites in the locations identified would not have the required capacity to address the level of growth needed.

Ref	Consultee	Issue	Consultee Response Summary
7 (SA69)	Natural England		Option 2 is constrained by the similar difficulties associated with Option 1, in that significant infrastructure provision would be required. We note that the development has been focussed around key transport corridors which in turn would put increased pressure on the main road junctions. Little attention has been paid to the public transport connectivity in these locations. The comment provided for Option 1 above also applies here, whereby distributing development across the borough will allow to appeal to different sectors of the market. Furthermore, this option would require significant new infrastructure to be provided which would be less viable, and less sustainable, than improving existing infrastructure in the settlements identified in Option 3.
		Approach	<ul style="list-style-type: none"> States that Natural England is satisfied that the SA objectives, assessment methodology and framework generally accord with the requirements of the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment Regulations.
		SA Framework	<ul style="list-style-type: none"> Considers that the objectives used to assess the impacts of the Plan are appropriate and address key issues within Natural England's remit including biodiversity, geodiversity, landscape and soils in addition to air quality, water quality/resources and climate change.
		Baseline	<ul style="list-style-type: none"> Welcomes the inclusion of amendments to address comments previously raised by Natural England including amendments to consider the impacts of the plan on BAP habitats and species and implementation of the Essex and South Suffolk Shoreline Management Plan. Also welcomes reference to the Site Improvement Plan (SIP) for the Essex Estuaries international sites.
		Baseline	<ul style="list-style-type: none"> Suggests that the Council develops a Green Infrastructure Strategy to enable the SA to more intelligently assess the Local Plan against the states SA objectives and guide questions.
		Baseline	<ul style="list-style-type: none"> Considers that Section 3.3 of the SA Report provides a comprehensive overview of the biodiversity and green infrastructure assets within and adjacent to the district boundary. Welcomes the identification of threats to biodiversity through development, including increased recreational pressure / disturbance.
		Appraisal: Housing Projections	<ul style="list-style-type: none"> Supports the mitigation measures identified in the SA Report in respect of biodiversity and land use and states that these measures should be developed through further iterations of the SA and will need to be fully addressed through the relevant Local Plan policies. States that the mitigation hierarchy should be applied, in accordance with the NPPF, such that measures to avoid adverse impacts on designated sites are prioritised. Where avoidance measures cannot be implemented appropriate measures to mitigate adverse effects should be provided. Compensation measures should only be considered as a last resort. Highlights that further mitigation measures are likely to be required to address adverse effects through impacts such as increased recreational pressure. The provision of a strategic green infrastructure network aligned with new growth areas will offer significant mitigation opportunities. The SA should ensure the delivery of this network through the local plan.
		Appraisal: Employment Projections	<ul style="list-style-type: none"> Supports the mitigation measures identified in the SA Report to protect and enhance biodiversity, including designated sites. States that the mitigation hierarchy should be applied, in accordance with the NPPF. Mitigation measures should be developed through further iterations of the SA and will need to be fully addressed through the relevant Local Plan policies.

Ref	Consultee	Issue	Consultee Response Summary
		Appraisal: Spatial Options	<ul style="list-style-type: none"> Advises that detailed assessment of proposals with regard to impacts on designated sites will need to be addressed through further iterations of the SA as the local plan progresses.
		Appraisal: Spatial Options	<ul style="list-style-type: none"> Supports mitigation measures identified to protect and enhance biodiversity, including designated sites. States that the mitigation hierarchy should be applied, in accordance with the NPPF. Mitigation measures should be developed through further iterations of the SA and will need to be fully addressed through the relevant Local Plan policies.
8 (SA20)	Andrew Martin - Planning Ltd on behalf of J & A Lyon and Mr Britcher	Appraisal: Spatial Options	<ul style="list-style-type: none"> Supports the broad findings set out in the SA Report and in particular Table 5.4 which confirms that Option 2 (Urban Focus and Growth on Key Transport Corridors) is the best performing of the three growth options, when assessed against the 14 SA objectives. Considers that Option 2 should be preferred option in the next draft of the Local Plan.
9 (SA23)	Rochford District Council	General	<ul style="list-style-type: none"> The Council has no observations to make on the SA Report.
10 (SA34)	Strutt & Parker LLP on behalf of Chelmsford Diocese Board of Finance	Reasonable Alternatives/Green Wedges	<ul style="list-style-type: none"> Considers that the appropriateness and sustainability of the inclusion of Green Wedges within the new Local Plan is a matter that must be appropriately considered through the plan-making process, including through SEA/SA. States that it is not appropriate for policies from the extant Development Plan to be simply carried forward into the new Local Plan without due consideration. It would be inappropriate for potential policies / options for inclusion in the new Local Plan to be assessed against policies from the plan which it will replace. Is concerned that the current approach being taken in respect of Green Wedges in the SA could result in sites that are on land currently allocated as Green Wedge from being rejected without proper consideration, regardless of their sustainability and appropriateness for development. This could constitute a failure to consider reasonable alternatives as part of the plan-making process as required by the SEA Regulations. States that the SA Report appears to assess options against current Green Wedge allocations, rather than assessing Green Wedge allocations themselves. Raises concern that this could result in reasonable alternatives that happen to be on land allocated as Green Wedge not being appropriately assessed, undermining the soundness of the Plan and potentially its compliance with the Environmental Assessment of Plans and Programmes Regulations (2004). Urges the Council to review its current approach vis-à-vis the SA and Green Wedges to ensure problems do not arise later in the plan-making process. States that one could infer that sites within the Green Wedge are not considered to have the potential to be allocated. Would welcome confirmation that this is not the case.
11 (SA39)	Essex County Council (ECC)	Plans and Programmes	<ul style="list-style-type: none"> ECC supports the adoption of the following ECC recommendations made to the SA Scoping Report into the Issues and Options "Sustainability Appraisal Report". Reference to key ECC policy and strategy documents " Sustainability Key Issues regarding: - reference to early years and childcare needs; - providing a range of employment sites to support economic growth; - support the delivery of independent living housing; - encouragement of a range of sustainable transport measures; and - address congestion in and around the City Centre. Sustainability Framework regarding: - support objectives and proposals of the Minerals Local Plan; - deliver SuDs and investment in flood defences to reduce vulnerability to flooding; - encourage use of multifunctional areas/landscape design for drainage; and - maintain and improve access to green infrastructure, open space, leisure and recreational facilities.
12 (SA53)	Andrew Martin - Planning Limited on behalf of Mr Marriage	Appraisal: Spatial Options	<ul style="list-style-type: none"> Considers that Table 5.4 of the SA contains an error under SA Objective 4 - "Urban Renaissance". Options 1 and 2 should score the same in accordance with paragraphs 5.5.5 and 5.5.14 of the document. The overall effect will be that Options 1 and 2 score equally on Table 5.4.

Ref	Consultee	Issue	Consultee Response Summary
13 (SA55)	Aquila Developments Ltd on behalf of Mrs Anne Chambers	Appraisal: Spatial Options	<ul style="list-style-type: none"> Observes that the SA notes that the performance of the three spatial options against SA objectives is very similar but ultimately seeks to distinguish between them on the basis, largely, of the greater dispersal inherent in Option 3 and on potential effects on settlement landscape / character. The advantages which accrue from organic settlement growth, more compact settlement form and reduction in urban congestion are not fully considered by way of counterbalance. Such a conclusion is plainly extremely broad brush and is insufficiently robust: particularly when applied to higher levels of the Settlement Hierarchy which have good facilities and afford excellent levels of accessibility.
14 (SA61)	Strutt & Parker LLP on behalf of Cliffords Ltd	Green Wedges	<ul style="list-style-type: none"> Considers that the appropriateness and sustainability of the inclusion of Green Wedges within the new Local Plan is a matter that must be appropriately considered through the plan-making process, including through SEA/SA. States that it is not appropriate for policies from the extant Development Plan to be simply carried forward into the new Local Plan without due consideration. It would be inappropriate for potential policies / options for inclusion in the new Local Plan to be assessed against policies from the plan which it will replace. Is concerned that the current approach being taken in respect of Green Wedges in the SA could result in sites that are on land currently allocated as Green Wedge from being rejected without proper consideration, regardless of their sustainability and appropriateness for development. This could constitute a failure to consider reasonable alternatives as part of the plan-making process as required by the SEA Regulations. States that the SA Report appears to assess options against current Green Wedge allocations, rather than assessing Green Wedge allocations themselves. Raises concern that this could result in reasonable alternatives that happen to be on land allocated as Green Wedge not being appropriately assessed, undermining the soundness of the Plan and potentially its compliance with the Environmental Assessment of Plans and Programmes Regulations (2004). Urges the Council to review its current approach vis-à-vis the SA and Green Wedges to ensure problems do not arise later in the plan-making process. States that one could infer that sites within the Green Wedge are not considered to have the potential to be allocated. Would welcome confirmation that this is not the case.
15 (SA62)	Strutt & Parker LLP on behalf of Eastern Approaches Investments Ltd	Reasonable Alternatives/Green Wedges	<ul style="list-style-type: none"> Considers that the appropriateness and sustainability of the inclusion of Green Wedges within the new Local Plan is a matter that must be appropriately considered through the plan-making process, including through SEA/SA. States that it is not appropriate for policies from the extant Development Plan to be simply carried forward into the new Local Plan without due consideration. It would be inappropriate for potential policies / options for inclusion in the new Local Plan to be assessed against policies from the plan which it will replace. Is concerned that the current approach being taken in respect of Green Wedges in the SA could result in sites that are on land currently allocated as Green Wedge from being rejected without proper consideration, regardless of their sustainability and appropriateness for development. This could constitute a failure to consider reasonable alternatives as part of the plan-making process as required by the SEA Regulations. States that the SA Report appears to assess options against current Green Wedge allocations, rather than assessing Green Wedge allocations themselves. Raises concern that this could result in reasonable alternatives that happen to be on land allocated as Green Wedge not being appropriately assessed, undermining the soundness of the Plan and potentially its compliance with the Environmental Assessment of Plans and Programmes Regulations (2004). Urges the Council to review its current approach vis-à-vis the SA and Green Wedges to ensure problems do not arise later in the plan-making process. States that one could infer that sites within the Green Wedge are not considered to have the potential to be allocated. Would welcome confirmation that this is not the case.
16 (SA106)	Strutt & Parker LLP on behalf of Hopkins Homes	Reasonable Alternatives/Green Wedges	<ul style="list-style-type: none"> Considers that the appropriateness and sustainability of the inclusion of Green Wedges within the new Local Plan is a matter that must be appropriately considered through the plan-making process, including through SEA/SA. States that it is not appropriate for policies from the extant Development Plan to be simply carried forward into the new Local

Ref	Consultee	Issue	Consultee Response Summary
			<p>Plan without due consideration. It would be inappropriate for potential policies / options for inclusion in the new Local Plan to be assessed against policies from the plan which it will replace.</p> <ul style="list-style-type: none"> Is concerned that the current approach being taken in respect of Green Wedges in the SA could result in sites that are on land currently allocated as Green Wedge from being rejected without proper consideration, regardless of their sustainability and appropriateness for development. This could constitute a failure to consider reasonable alternatives as part of the plan-making process as required by the SEA Regulations. States that the SA Report appears to assess options against current Green Wedge allocations, rather than assessing Green Wedge allocations themselves. Raises concern that this could result in reasonable alternatives that happen to be on land allocated as Green Wedge not being appropriately assessed, undermining the soundness of the Plan and potentially its compliance with the Environmental Assessment of Plans and Programmes Regulations (2004). Urges the Council to review its current approach vis-à-vis the SA and Green Wedges to ensure problems do not arise later in the plan-making process. States that one could infer that sites within the Green Wedge are not considered to have the potential to be allocated. Would welcome confirmation that this is not the case.
17 (SA108)	Dominic Lawson Bespoke Planning Ltd on behalf of Threadneedle Pensions Ltd, Hanson UK and Countryside Zest	General	<ul style="list-style-type: none"> States that the SA Report is a thorough and generally robust document.
		Appraisal: Spatial Options	<ul style="list-style-type: none"> States that it is curious and inconsistent that Table NTS5 and Table 5.4 of the SA Report assess Option 1 as being slightly less sustainable than Option 2 with regard to Urban Renaissance. The reason for this assessment and its justification is highly questionable. Paragraphs 5.5.5 (Option 1) and 5.5.15 (Option 2) find that both options are assessed as significantly positive with some negatives, whereas we consider that a more accurate assessment would be to score both Options 1 and 2 as equal in Table NTS5 and SA Table 5.4. In addition, the tables give insufficient weight to the fact that the larger scale strategic developments on the edge of Chelmsford in Option 1 will have greater propensity to contribute towards high levels of infrastructure than the smaller scale urban extensions in Option 2 and 3. As a consequence, Option 1 represents the most sustainable and most appropriate spatial option for growth and this should represent the preferred option at the next stage of the Local Plan process. States that Option 2, which seeks to locate some of the growth identified in Option 1 towards the key transport corridors, risks diluting the positive sustainability effects that more concentrated growth, near to existing services and facilities, would bring. In particular, this option risks encouraging car use. Although the SA in paragraph 6.1.13 finds Options 1 & 2 to be the best performing spatial options when assessed against the SA objectives, it is for the reasons set out above and sequentially that Option 1 is considered to be the best performing Option.
			<ul style="list-style-type: none"> States that Option 3 is the least sequentially preferably spatial option for growth, in particular due to the potential for negative effects on the character of smaller settlements and surrounding landscape.
18 (NTS7)	Mr Jim Murray	Non-Technical Summary	<ul style="list-style-type: none"> States that the SA NTS is helpful as a reference at times and to clarify some specific points on the Issue and Options Consultation.
19 (SA24)	Mrs April Chapman	General	<ul style="list-style-type: none"> States that sustainability is only achievable with joined-up thinking and co-operation among all areas, not just as an issue for one Council.
20 (SA43)	Mr & Mrs Albert and Hazel Clements	Appraisal: Spatial Options	<ul style="list-style-type: none"> States that in the SA Report, the majority of the points when applied to the Writtle Option raise a negative answer, as follows:

Ref	Consultee	Issue	Consultee Response Summary
			<ul style="list-style-type: none"> 1) Biodiversity & Geodiversity: To sustain and conserve and enhance biodiversity & geodiversity and promote improvements to the green Infrastructure Network. Will it conserve and enhance species diversity and in particular harm indigenous species of principle importance or priority species of habitats? 5) Health & Wellbeing Improve health and wellbeing of those living and working in Chelmsford 6) Transport To reduce the need to travel, promote more sustainable model of transport and align investment in infrastructure with growth Will it help reduce traffic congestion and improve road safety. Will it support the expansion or provision of additional Park and rid facilities? 7) Land use and soils to encourage efficient use of land and conserve and enhance soils. Will it help promote the use of previously developed brownfield land and minimise the loss of greenfield land? No, and nor will it promote the yes answer to any of the other issues under this heading, i.e. 9) Flood Risk and Erosion to reduce the risk of flooding and coastal erosion to people and property, taking into account the effects of climate change. 10) To improve air quality 13) Cultural Heritage Conserve and enhance the historic environment, cultural heritage, character and Setting. <ul style="list-style-type: none"> States that none of these points can be applied as an argument to promote the Writtle Proposed development.
21 (SA96)	Mrs Teresia Gibson	Appraisal	<ul style="list-style-type: none"> States that significant negative effects are expected on biodiversity, air quality, water, flood risk, climate change and waste of resource use.
			<ul style="list-style-type: none"> States that significant negative effects have been identified in respect of land use for all projections due to the loss of greenfield land. Added to that is light pollution, already much worse since the huge expansion of Broomfield Hospital (with the loss of lots of woodland) and noise pollution. (Quoted from page 1 of sustainability appraisal of the Issues and Options Consultation Documentation).
			<ul style="list-style-type: none"> States that one cannot imagine development of a very special area of grassland, woodland, natural habitat and a heaven for walkers just because of the peace and quiet and historic atmosphere of the area of where a potential western Relief Road is in Option 1, 2 and 3. I suggest all the planners go for a walk up there and breathe in the air, observe the views and count themselves so lucky that there is still an area like this so close to the (too fast) development of Chelmsford. I imagine the status of City is good for business etc. in Chelmsford. But it might be also very good to contemplate overdevelopment and loss of areas that are never to be replaced.
22 (SA89)	Mrs Dianne Collins	General	<ul style="list-style-type: none"> States that the SA Report is flawed and only takes into account the Council's desired wishes.
23 (SA100)	Mrs Hazel Dale Evans	General	<ul style="list-style-type: none"> Comments 'Somebody in Foster Wheeler got a PHD for this?'
24 (SA111)	Basildon Borough Council	General	<ul style="list-style-type: none"> The Council has no comments on the SA Report.
25 (SA105)	Mrs Rosalind Smith	Spatial Options	<ul style="list-style-type: none"> States that since this appraisal is limited to the consideration of the 3 options which are essentially the same, it is of limited value in assessing the sustainability of locations for future housing needs.

Ref	Consultee	Issue	Consultee Response Summary
26 (SA113)	Campaign to Protect Rural Essex		<ul style="list-style-type: none">Does not agree with the implications of Table NTS 3 in the non-technical summary to the Sustainability Appraisal that suggests the more housing the better. States that more houses may mean more people and more people may mean a greater GDP for Chelmsford. But what is economically more important to the resident of Chelmsford- or anywhere- is GDP/head? Sustainability is also - and ultimately more so for the next generation and beyond - a matter of quality of life. And it is demonstrably true that too many people with too many cars and too little space detracts from quality of life.
			<ul style="list-style-type: none">Unfortunately, the pink/beige colours used in NTS 3 do not correspond with the key in Table NTS 2 rendering most of NTS 3 impossible to interpret.

4. Schedule of Responses Relating to Local Plan Matters

Ref	Consultee	Issue	Consultee Response Summary
NTS2	Mrs Juliette Alexander-Read	Local Plan	<ul style="list-style-type: none"> Supports Spatial Option 3, as this seems to consider the longer term future and offers more scope - bearing in mind the growing demand for housing/ rising population etc.
NTS4	Mr Peter Pegg	Local Plan	<ul style="list-style-type: none"> Considers that the possible long-term effects on Writtle have not been fully taken into account. For the following reasons: <ol style="list-style-type: none"> In the consultation process does not feel that valid alternative options have been provided. Considers that all three options presented show extensive future housing growth in the West of Chelmsford, but not enough focus has been given to alternative options for growth in the East of the city. Considers that all three options include reference to a 'Potential Western Relief Road'. Has a number of concerns regarding this: a. there are no details of a timescale for this to be implemented. b. There are no precise route details (e.g. where linked to the A414 or the Broomfield/Waltham's area). c. No cost evaluation for the new road(s). d. No consideration of the effect of extra traffic volumes through the village of Writtle. In relation to point 3d above, the only route for traffic from the north-western part of Chelmsford to the A12 is directly through Writtle, which already sees heavy traffic at times, particularly in Lordship Road, Writtle Green, Lodge Road and Margaretting Road. Considers that with additional housing in Western Chelmsford (as proposed) this would only exacerbate current problems. Considers that more emphasis should be placed on proposing housing developments on the East side of Chelmsford, closer to the A12 and the new railway station, thus avoiding the difficult (and costly) route to the A12 from the West side. Concerned that too much emphasis is being placed on the development at Warren Farm. Is aware that a number of other potential development options have been excluded in the initial evaluation phase and urges the Council to re-open the evaluation of other land options in the East.
SA1	Mr Colin Budgey	Local Plan	<ul style="list-style-type: none"> States that the vision for Chelmsford has many good ideas, but this could be an excellent opportunity to put Chelmsford at the forefront of renewable technology, and to make it the "solar capital" of Britain.
SA2	Sandon Parish Council	Local Plan	<ul style="list-style-type: none"> Sandon Parish Council are concerned that a further 800 houses will put a huge strain on this small, historic, rural community. States that the village could probably accommodate a few more properties if thoughtfully placed. Highlights that the village's roads are already being used a short cuts from places surrounding Chelmsford, especially from Maldon via Danbury along Hulls Lane and Woodhill Road etc., from the south via Rettenden along Southend Road, and from East Hanningfield along East Hanningfield Road. The existing infrastructure is inadequate with cars avoiding the A12 and A414 with more accidents and near misses being witnessed on our rural roads. States that the village has one school, one pub, one Church and one Chapel and no shops or doctors surgeries and understands that if the village did agree to 800 houses the development would possibly include a doctors surgery, and a school, with open spaces and cycle paths. No shop was included. Sandon cannot accommodate this size development. Prefers Options 1 and 2 of the Local Plan and supports the potential green buffer to the North of Sandon up to the A414 to protect us from development from Chelmsford and Great Baddow.
SA3	Mrs Rachael Hopkins	Local Plan	<ul style="list-style-type: none"> Does not consider the plan to deliver between 2250-3000 houses on Warren Farm to be suitable due to a lack of infrastructure and existing congestion. States that Warren Farm collects a lot of water on the fields. If development took place on this land, the water is only going to flow downhill into Writtle where the river already floods so will cause another problem.

Ref	Consultee	Issue	Consultee Response Summary
			<ul style="list-style-type: none"> States that none of the 3 options are suitable and the houses can be placed elsewhere in Chelmsford.
SA4	Mr Gail Aston	Local Plan	<ul style="list-style-type: none"> Objects to Options 1, 2 and 3 and fails to understand the logic or practicality of building up to 3,000 houses on land at Warren Farm, Lordship Road, Writtle due to the lack of road and transport infrastructure and local amenities in this area and that this development would double the population of Writtle and merge the village into the City of Chelmsford. States that the area is a greenfield site of high quality farmland and any major development in the area would result in major traffic congestion. Considers that the 'potential' Western Relief Road will not be delivered. States that as most of Chelmsford's major transport infrastructure such as the Beaulieu Park Railway Station, the A12 and the A12 Park and Ride Scheme are situated to the north and east of the city, this should be the area for most of the new development after 2021.
SA7	Mr Kevin Mcloughlin		<ul style="list-style-type: none"> Raises concerns on the effects of the options on Rettendon. States that all 3 options show improvements to the A132 but the section from the Rettendon Turnpike to South Woodham Ferrers isn't really the problem (two roads exist to take this traffic.) The problem is the congestion at the turnpike and the traffic to Wickford. Presently it is very difficult to enter the turnpike roundabout from Rettendon at busy times and this is before the effect of the additional 600 or so homes on the site of the old Runwell hospital. States that the level of growth at Rettendon Place seems inappropriate as it would require a trip by road to either South Woodham Ferrers or Chelmsford. This would involve travelling along the old A130 through Rettendon village, which is the very road having pinch points installed on completion of the new A130. Overall, suggests that any additional housing that is needed in Chelmsford in concentrated around the Springfield / Boreham area where development is currently taking place, along with all the additional infrastructure that is required, i.e. the new station and proposed bypass.
SA8	Mr Christopher Turner	Local Plan	<ul style="list-style-type: none"> Considers Option 1 to be the most appropriate Spatial Option. States that building on brownfield sites is more suitable than using greenbelt land. States that improvement to existing infrastructure needs to be in place before any development, such as the new railway station at Beaulieu Park, the long mentioned north east bypass, the widening of the A12, the improvement for the Boreham interchange and finally the western relief road. Considers the number of proposed houses to be exceptionally high for the normal process of births, deaths, marriages within the local area and that this is to compensate the lack of adequate affordable houses in London. States that the Green Belt and countryside around Chelmsford should be protected now and for future generations and that local farmland is a valuable source of varied crops as well as acting as very important flood plain areas. States that Option 3 would destroy local communities in villages which are already struggling to cope with infrastructure and also demands on schools and doctors services.
SA9	Mr Michael Allen	Local Plan	<ul style="list-style-type: none"> Highlights issues of road traffic in Broomfield. States that the North-East bypass is needed to alleviate this. States that there is insufficient facilities to support new development. Suggests that development should take place around the area for the new proposed station. Asks what happened to Boreham Airfield?
SA10	Mr Michael Allen	Local Plan	<ul style="list-style-type: none"> States that Broomfield cannot sustain any considerably large developments.

Ref	Consultee	Issue	Consultee Response Summary
SA11	Mr Richard Huke	Local Plan	<ul style="list-style-type: none"> • Opposes Spatial Option 3. States that the infrastructure in villages is inadequate to absorb large scale developments and that the character of Essex villages is something that should be cherished not sacrificed, especially as there are other more viable solutions to the need for housing. • States that the traffic already using the roads linking villages to the main centres of Chelmsford and South Woodham Ferrers are congested, notably so at rush hours and school times. Further large scale development would dramatically add to journeys, especially as many villages have health and schooling facilities which are full. • New large scale developments should include new social infrastructure for the new inhabitants. These would not materially alter the character of larger urbanisations, but would in a village setting.
SA12	Mr Russell Townsend	Local Plan	<ul style="list-style-type: none"> • Disappointed that there is more housing and road building planned for areas to the west and north of Chelmsford. States that a new road between the Walthams and Writtle would carve through open peaceful countryside popular with walkers and cyclists and inevitably encourage future developments. • States that new developments should be located near the A12/A130 and where the new Chelmsford railway station is proposed.
SA14	Mr James Breeze	Local Plan	<ul style="list-style-type: none"> • Consultee sets out the following responses to the consultation questions: <ul style="list-style-type: none"> ◦ Question 14: Roads and Transport- Put development near the new station and the A12 corridor. Don't waste resources on starting a new western Bypass from scratch. Use them to get the long-awaited North-East Bypass off the ground that should be a huge benefit to the residents in Broomfield. ◦ Question 15: Protecting the Environment - It does not make sense to build on the best farmland to the north and west, when there is lower grade land south of the A12? Chelmsford's own planning documents say the countryside near Broomfield has a 'strong sense of tranquillity' whilst the land near the A12 is already affected by noise. ◦ Question 20: Chelmsford's 3 Options - None of the 3 options are right. The 3 options are not very different especially for places like Broomfield, so do not offer much choice. ◦ Question 21: Alternative Options? - Yes, there should be an option based on locating as much of the development as possible near the new railway station, the A12/A130 and the existing Station at South Woodham Ferrers. ◦ Question 22: the 17 Locations for new Development - I strongly object to location 2 (west of Chelmsford); 3 (North Chelmsford/Broomfield); 14 (Great Waltham); 15 (Little Waltham). I am undecided about 7 (Great Leighs) and 13 (Ford End) but are happy with the rest. ◦ Question 23: Alternative Locations? - Since a new station in East Chelmsford will improve rail infrastructure there from 2021, locate as much development as possible within a mile of it, next to the A12. ◦ Question 24: Potential western 'relief' road - The North East Bypass must happen. This will help to get through traffic out of Broomfield. A western road would just enable developers to concrete over more of the countryside without bringing much relief to Broomfield indeed it would make the traffic even worse once 'in-filling' takes place. It would take ages to plan and build a western 'relief' road and could divert resources away from the North East Bypass. ◦ Question 26: Should large new settlements have been discounted? - No. The City seems happy to consider a large new settlement of 3,000 houses in a sensitive landscape area west of Chelmsford, even though there are no roads. So it is contradictory to rule out Hammonds Farm on the east side of Chelmsford, closer to much better transport infrastructure. Boreham Airfield should not be ruled out either, as the document states it could be developed after 2031 anyway.)
SA15	Mrs Sheila Hasler	Local Plan	<ul style="list-style-type: none"> • States that St Mary and St Leonard Church in Broomfield is one of the few Round Tower churches in Essex and at present is still on the edge of the village with a prospect of fields beyond. Asks how soon will it become just another church within the Borough? • Notes that climatic variables and atmospheric pollution have eradicated many species of flora in Essex over the years.

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			<ul style="list-style-type: none"> Considers small pockets of housing to be acceptable.
SA17	Mr Ian Plimmer	Local Plan	<ul style="list-style-type: none"> States that the land around Broomfield is fine quality agricultural land and is also an area of peacefulness and tranquillity and should be protected. Considers that there are other options including land nearer to the A12 as it already sustains more noise pollution and the quality of the land for agricultural purposes is significantly poorer than around Broomfield. Asks what happened to previously stated commitments? States that the infrastructure shortfall needs addressing before consideration for further housing is proposed.
SA18	Mr Nick Long	Local Plan	<ul style="list-style-type: none"> Concerned that development will affect the identity of Boreham.
SA19	Mr Steven Clark	Local Plan	<ul style="list-style-type: none"> Concerned about the proposal to develop 4500 new houses to the West of Chelmsford for the following reasons: <ol style="list-style-type: none"> The plan would spoil the countryside and green field sites that are a characteristic part of the west side of Chelmsford and would create an urban sprawl all around the city. The area is already congested. Roxwell road for example always appears to be quite busy at rush hour times. The area does not have the infrastructure to support such a large development on the west side on top of all the current developments taking place. There are better sites with superior infrastructure to the north and east side of Chelmsford (not including Broomfield).
SA21	Mr David Howell	Local Plan	<ul style="list-style-type: none"> States that Broomfield has already taken 800 new properties, the further 750 in Option 3 should be drastically reduced.
SA22	Mr Stephen Harley	Local Plan	<ul style="list-style-type: none"> No comments.
SA26	Mr Stephen Holt	Local Plan	<ul style="list-style-type: none"> Asks why the Council does not build affordable housing of appropriate styling in appropriate - planned - places, with necessary infrastructure.
SA27	Ms Alison Jeffs	Local Plan	<ul style="list-style-type: none"> Highlights issues relating to affordable housing. States that appropriate sites (brownfield) close to existing travel links should be developed to cause least disruption/easier access for Chelmsford. Considers that West of Chelmsford is a beautiful unspoilt area of high grade farmland noted for its strong sense of tranquillity and which has no infrastructure. States that all the 4,500 houses would be more than a mile away from Chelmsford Rail Station, meaning more traffic needing to squeeze into the already congested roads to get to the City Centre. Suggests that the 4,500 houses could be delivered instead within a mile of The Beaulieu Park Railway Station so that people can walk or cycle, without the need to drive into the City Centre. Also considers that there are more potential sites along the A12 corridor that would be within cycling or a short bus journey of the new station and are outside the Green Belt. Highlights that all the farmland in this area is lower grade than to the West and the tranquillity of much of the countryside is already affected by the A12.
SA28	Mrs Marion Delaney	Local Plan	<ul style="list-style-type: none"> Highlights existing traffic issues around Writtle and considers that additional development would exacerbate them.
SA29	Mrs Gillian Lodge	Local Plan	<ul style="list-style-type: none"> Objects to housing near Broomfield, Writtle and the Walthams due to loss of character, prime farmland, trees, hedgerows, wildlife and country walks and increased risk of flooding.

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			<ul style="list-style-type: none"> Considers there to be a lack of infrastructure including GP surgeries, pharmacies, shops, supermarkets, school, sewers water etc and highlights congestion issues that would be increased by development. Suggests that development should take place near to the proposed new train station and to the south-east of Chelmsford to provide direct access onto the A12 and the A130.
SA30	Mr Kevin Drury	Local Plan	<ul style="list-style-type: none"> States that environmental, flood and traffic studies should be carried out and reported.
SA32	Mr Andrew Lilley	Local Plan	<ul style="list-style-type: none"> Considers that there is no vision shown. States that farmland should be protected.
SA35	Mr & Mrs Alexander and Eleanor Evans	Local Plan	<ul style="list-style-type: none"> States that the Council should consider widening the A12, increasing rail capacity on the main line and reopening the railway line to Maldon. States that Spatial Option 3 is not sustainable due to traffic on the A414 and pressure on primary schools in Danbury.
SA37	Mr Leon Lallyette	Local Plan	<ul style="list-style-type: none"> Wants to protect the countryside and build more schools. Does not support the potential Western Relief Road.
SA40	Stonebond Properties Ltd	Local Plan	<ul style="list-style-type: none"> No.
SA41	Newlands Spring Residents Association	Local Plan	<ul style="list-style-type: none"> No comment.
SA44	Mr Frank Miller	Local Plan	<ul style="list-style-type: none"> States that there is still no indication of the proposed North East Bypass and without this commitment the road north east of Chelmsford cannot accommodate future development.
SA45	Mr John Miller	Local Plan	<ul style="list-style-type: none"> Considers there to be a significant anomaly between key elements of the Council's Spatial Principles and the resultant Spatial Options which are being proposed. States that although there are minor variations between the three options, these are mainly relatively small adjustments affecting outlying locations. In all three options in the area contiguous with the Urban Area it is proposed that around 60% of the new development would be located to the west of the City, these being the sites identified as West Chelmsford and Broomfield. This cannot be reconciled with the stated principles to locate development at well-connected sustainable locations and to ensure that new development is served by necessary infrastructure. Both sites appear to be using greenfield land. The lack of necessary infrastructure to support such development is the principle cause for concern. The area is currently affected by a large volume of commuter traffic using the Chignal Road/Roxwell Road/Writtle route to reach the A12 at Margaretting or to continue further to Ingatestone for the rail connection to London. This is likely to increase further as the completion of Crossrail in 2018 will provide an additional attraction. The volume of traffic noticeably increased with the completion of the Newlands Spring development several years ago and subsequently has been supplemented by smaller developments at Great Leighs and Broomfield. In addition to the regular traffic the area is often grid-locked, on average probably about once per month, when a disruptive incident on the A12 results in that traffic seeking an alternative route. The addition of a further 4,000 properties will exacerbate the problem which is probably well understood by the council and will not be mitigated by the inclusion on the plans of the dotted line representing the 'Potential' Western Relief Road. Clearly, this road would be vital if such a large development went ahead in this area. In reality such a road is a distant dream, it would be controversial and expensive to construct, and would need to link with the A12 to provide any meaningful value. In view of the above it is surprising that the area to the east of Chelmsford has been discounted. Development there would benefit from the new station at Beaulieu and the proposed improvements to the A12, both of which are in a more advanced stage than any infrastructure development on the west side of the city. The potential site at Boreham would appear to be extremely suitable being

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			within close proximity to both the A12 and the new station. The extraction of all the material from the site whilst desirable abandonment might represent a lower cost than a new road on the western side.
SA46	Mrs Liisa Dorothy Lloyd	Local Plan	<ul style="list-style-type: none"> Consultee sets out the following responses to the consultation questions: <ul style="list-style-type: none"> Question 19: Whilst I fully support the protection of Green Belt areas I have observed that there are within those areas shown in the options plans as Green Belt is number of Brown Field sites. If these were incorporated into the plans it would surely relieve the burden on the rest. Question 24: The largest and most popular part of Broomfield Hospital catchment area is to the North, East and S.West of Chelmsford, making access from those directions paramount. In my view the NE Bypass would facilitate this. For Broomfield village residents it is now urgent. Question 22: Huge numbers of new homes will require additional school places, quite probably new schools generating more local traffic. In Broomfield there is nowhere other than Main Road for that traffic. Main Road is already at or nearing capacity.
SA47	Mrs Margaret Clarke	Local Plan	<ul style="list-style-type: none"> Raises concerns with regard to impacts on villages.
SA48	Mr David Edwards	Local Plan	<ul style="list-style-type: none"> States that adequate infrastructure must be provided before development takes place, including off road car parking and road infrastructure.
SA49	Mrs Avril Garrett	Local Plan	<ul style="list-style-type: none"> Highlights that Broomfield Road is already heavily congested and states that more housing will exacerbate this. Wants to protect Broomfield, the countryside and wildlife.
SA50	Mr Stanley Garrett	Local Plan	<ul style="list-style-type: none"> Asks, when all the proposed development has been completed will there the proposals for more building of houses, schools etc.
SA51	Mr John Denniss	Local Plan	<ul style="list-style-type: none"> Asks what consideration has been given to the type of housing envisaged?
SA54	Mrs Carol Bonnett	Local Plan	<ul style="list-style-type: none"> States that, in general, Chelmsford as a whole is too crowded and that villages should be protected. Considers that there are plenty of areas surrounding Broomfield where development can take place such as the A12/A130 and Boreham Airfield. Considers there to be insufficient infrastructure in Broomfield to accommodate development.
SA56	Bloor Homes Eastern	Local Plan	<ul style="list-style-type: none"> No Comments.
SA57	Mrs Anne Newland	Local Plan	<ul style="list-style-type: none"> States that infrastructure will not be able to sustain the proposals and should be reconsidered.
SA58	Mr Derek Cooley	Local Plan	<ul style="list-style-type: none"> Would accept some development to the west of Chelmsford but not the large proposed number of houses. States that development should take place in areas close to existing development. Does not agree with the Writtle Parish Council suggestion that development to the west of Chelmsford will increase flood risk to Writtle. Considers that development should be focused to the east of Chelmsford using the new rail station. States that if any development is delivered to west of Chelmsford, a park and ride facility should be provided.
SA59	Mr Peter Bonnett	Local Plan	<ul style="list-style-type: none"> Questions whether there are sufficient infrastructure and services to accommodate development in Broomfield and Chelmsford as whole.

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SA60	Mr Keith Spiller	Local Plan	<ul style="list-style-type: none"> Suggests that development should be focused on brownfield sites around the new rail station and around newer developments and then other areas (even small settlements) which would benefit from regeneration and proportionately in all areas i.e. per existing population size vs whole of Chelmsford.
SA63	Mr Graham Dobinson	Local Plan	<ul style="list-style-type: none"> States that any new housing needs to be in one place near transport links to London.
SA64	Mrs Joan Smith	Local Plan	<ul style="list-style-type: none"> States that any development should leave villages such as The Chignalls separated from the main urban area so that they do not become subsumed into that area.
SA66	Mrs Pamela Fitch	Local Plan	<ul style="list-style-type: none"> Asks whether consideration has been given to the possible expansion of ARU and states that some towns are finding that local housing areas are badly affected when there is student housing. States that the Council should discuss this issue with ARU. Highlights that Broomfield road/main road has regular tail backs in the morning as cars try to park at the hospital. Considers that the park and ride might help this, but it is not being well advertised.
SA67	Mr David Fincham	Local Plan	<ul style="list-style-type: none"> Considers it wrong to impose substantial new development on existing villages, which will alter their whole character. States that the hospital and local surgeries are already near to breaking point and it should not be assured that use of cars will decrease.
SA68	Mrs Irene Carrington	Local Plan	<ul style="list-style-type: none"> States that good graded agricultural land should not be built on and that a new town would be a better option.
SA70	Mr Jeremy Clement	Local Plan	<ul style="list-style-type: none"> Raises concerns with regard to the price of starter homes.
SA71	Mr Timothy Collins	Local Plan	<ul style="list-style-type: none"> Consultee raises the following concerns: <ol style="list-style-type: none"> Too much is based on historic trends and models. It is too soon to ask about specific options- surely consultation on what the population of Chelmsford want should come first- then principles and options (which in general are adequate already)- finally options. Two suggestions of options: a) Chelmsford has reached its optimal size- consider a new town (like Harlow or Basildon) in the A12 or A120 corridors. b) Concentrate development into the area near the new station and eastern relief road. With Broomfield and the Walthams particularly in mind: a) The case for an western relief road is totally unproven. b) The eastern relief road should be progressed as quickly as possible. c) Parish Plans should be updated to identify possible developments and where facilities need enhancement- (Broomfield has particular problems with congestion because of the hospital and Chelmer Valley School- at the same time has no GP surgery) d) Any development should ensure that villages retain their separate identity. Finally, infrastructure first, development to follow (Highways in particular) Use of greenfield development should be a last resort.
SA72	Mrs Wendy Stubbings	Local Plan	<ul style="list-style-type: none"> Raises concerns with regard to existing congestion and road traffic accidents. Also highlights water and sewage issues.
SA73	Mr William Carrington	Local Plan	<ul style="list-style-type: none"> Does not consider that expanding existing settlements, in particular small villages, can be easier, less costly or quicker than building a new large settlement. Also considers that a new settlement would minimise impacts on good agricultural land, visual amenity, recreation etc.

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SA74	Countryside Properties PLC	Local Plan	<ul style="list-style-type: none"> Comments have been submitted jointly and on behalf of Countryside Properties by Dominic Lawson Bespoke Planning and Andrew Martin - Planning in respect of Location 4 North East Chelmsford.
SA76	Mr Martin Jackson	Local Plan	<ul style="list-style-type: none"> No comment.
SA77	Mr John Parr	Local Plan	<ul style="list-style-type: none"> No comment.
SA78	JB Planning Associates Ltd on behalf of Bovis Homes Limited	Local Plan	<ul style="list-style-type: none"> Raises a number of issues principally relating to Green Belt.
SA80	Mr A Towns	Local Plan	<ul style="list-style-type: none"> Consultee raises the following question in respect of Spatial Option 1: Great Leighs a village get 2000 homes and referred to as urban, and in Option 3 as a village and getting 1000 homes. So does this mean it would not be a village anymore, but a town with no facilities. The same goes for Broomfield, the whole fabric of the North West of Chelmsford would be changed but nothing at all built in the South West of Chelmsford. Why?
SA81	Christian Care	Local Plan	<ul style="list-style-type: none"> States that Chelmsford should plan to be a preferred place to live, creating high quality living environments (reflecting best practice abroad).
SA82	Mrs Colleen Abrahams	Local Plan	<ul style="list-style-type: none"> States that Section 5.4 tries to imply that "widening the choice of high quality homes" is pursuing sustainable development and that this is nonsense. Considers that there is already a large amount of high quality homes and our priorities should not be to build more expensive houses, but encourage apartments or flats of affordable amounts, taking up less space.
SA83	Mr John Dale	Local Plan	<ul style="list-style-type: none"> No comment.
SA85	Mrs Susan Hibbitt	Local Plan	<ul style="list-style-type: none"> Highlights that Broomfield Hospital struggles with bed availability and questions how the hospital could accommodate more people.
SA86	Howe Green Community Association	Local Plan	<ul style="list-style-type: none"> States that Option 2- Location 5 would conflict with para 5.67 (maintaining and extending green wedges). With regard to Option 3- Location 8, states that development of the scale proposed is unlikely to be cost effective. Howe Green is relatively isolated with no facilities. Development in itself will exaggerate greatly existing congestion around the A12/A130 junction. States that the impact of future development in Maldon is a serious omission from the Plan and that consideration of the impact on the A414 is essential. Considers that a Maldon rail link to the proposed new station may be worthy of long term consideration.
SA87	Mrs Wendy Daden	Local Plan	<ul style="list-style-type: none"> Raises concerns with regard to traffic and congestion in Broomfield and lack of funding to resolve existing highways issues. States that there is insufficient infrastructure and services (including schools and the hospital) to accommodate growth.
SA88	Mr Malcolm Feltwell	Local Plan	<ul style="list-style-type: none"> States that the Council should start by assessing current needs and infrastructure, particularly transport and then decide where houses can be built and are needed to support the existing community States that commuters need to be near the railway station or major trunk roads. States that small scale development works better for communities.

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			<ul style="list-style-type: none"> States that cycle and walkways need proper provision and segregation if they are to be used extensively Considers that global warming may make good agricultural land an essential resource.
SA90	Mrs Lisa Morena	Local Plan	<ul style="list-style-type: none"> No comment.
SA91	Mr Barry Wood	Local Plan	<ul style="list-style-type: none"> Consultee states: Air quality, use of big trees (obviously not when originally planted). Litter, rubbish collection and recycling. Encouraging the use of pathways for cyclists and pedestrians by maintaining them.
SA92	Little Baddow Parish Council	Local Plan	<ul style="list-style-type: none"> In response to Q30, raises concern that the proposals are predicated upon the availability of infrastructure funding, and in particular transport infrastructure funding, over the Plan period, when there is no assurance available that such funding will be forthcoming. States that this matter is implicit within the SA, but even there the extent to which the Local Plan is vulnerable to funding shortfalls at National or County level is not explicit.
SA93	Mr Sergio Morena	Local Plan	<ul style="list-style-type: none"> No comment.
SA94	Mr Paul Grundy	Local Plan	<ul style="list-style-type: none"> No comment.
SA95	Mrs Anne Walden	Local Plan	<ul style="list-style-type: none"> States that significant effects on Chelmsford City is the closing of small shops very much due to the cost of car parks, especially to the village residents who pay rates to Chelmsford City Council.
SA97	Mr Dennis Bailey	Local Plan	<ul style="list-style-type: none"> States that Broomfield does not have sufficient infrastructure or services to accommodate growth.
SA98	Mr Ronald Doherty	Local Plan	<ul style="list-style-type: none"> States that effects of traffic volumes and enjoyment of life have not been considered in any of the proposals.
SA99	Mr Ian Mercer	Local Plan	<ul style="list-style-type: none"> Considers there to be a lack of long-term vision, and integration of wider issues such as land use and soil loss. States that the narrowness of the three 'options' reveals this.
SA101	Mrs Susan Browning	Local Plan	<ul style="list-style-type: none"> Feels that the plan to date has not taken the following into account: <ol style="list-style-type: none"> The environment- a) Grade 2 listed agricultural land b) The height of the land, noise will travel over the whole area leading to stress and mental health problems for residents c) The need to cut pollution noise and emissions d) The need for areas where people can get away from this and enjoy the countryside. This need which will increase with the growing population. Transport links- Not enough use has been made of the existing links e.g. A12 & A120 in the south and A130& M11 in the north (Braintree development). Also the new station opening in 2022 at Boreham. Community- a) Schools- Already our schools are oversubscribed more houses more children! b) Doctors surgeries- The existing ones are full and many can't get GP's so rely on locums c) Space for available leisure activities- Areas to walk, jog and play d)- New community centres and local shops. In all I think whilst a lot of work has been done it needs to be done well more thought to those of us who live in the area now.
SA102	Mrs Sharon Ashwell	Local Plan	<ul style="list-style-type: none"> Considers that there is insufficient infrastructure and services to accommodate growth in Broomfield.
SA103	Mr Alan Browning	Local Plan	<ul style="list-style-type: none"> Feels that the plan to date has not taken the following into account: <ol style="list-style-type: none"> The environment- a) Grade 2 listed agricultural land b) The height of the land, noise will travel over the whole area leading to stress and mental health problems for residents c) The need to cut pollution noise and emissions d) The

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			<p>need for areas where people can get away from this and enjoy the countryside. This need which will increase with the growing population.</p> <p>5. Transport links- Not enough use has been made of the existing links e.g. A12 & A120 in the south and A130& M11 in the north (Braintree development). Also the new station opening in 2022 at Boreham.</p> <ul style="list-style-type: none"> Community- a) Schools- Already our schools are oversubscribed more houses more children! b) Doctors surgeries- The existing ones are full and many can't get GP's so rely on locums c) Space for available leisure activities- Areas to walk, jog and play d)- New community centres and local shops. In all I think whilst a lot of work has been done it needs to be done well more thought to those of us who live in the area now.
SA104	Mr Allan Baker - Lucis-Agent	Local Plan	<ul style="list-style-type: none"> Understands that new housing is essential for the growing city and states that consideration needs to be given to how young people are housed. Highlights that many large buildings are being underused and could be used more effectively by providing council house developments.
SA110	Mr Christopher Lodge	Local Plan	<ul style="list-style-type: none"> States that Chelmsford is just a commuter town with no soul and that building a relief road to the West is useless as it goes nowhere and does not connect to any main road system.
SA112	Mrs Riche Lallyette	Local Plan	<ul style="list-style-type: none"> Concerned that Overall all I am concerned for the future of my children, houses being built on sensitive areas wildlife being affected structure not sufficient.

5. Summary of Natural England's Response to the Habitats Regulations Assessment: Initial Scoping

Ref	Consultee	Consultation Question/Issue	Consultee Response Summary
1	Natural England	1. Is Natural England content that the proposed spatial scope is reasonable for the HRA of the Local Plan?	<ul style="list-style-type: none"> • Considers that, in general, the Initial Scoping Report provides a good overview of the relevant European sites and their sensitivities, potential effects and pathways for impacts. • Highlights that it is not normally appropriate to employ 'arbitrary' distance zones to determine those European sites that should be considered within an HRA but considers the proposal to assess the potential effects of the Local Plan on all European sites within 15km of the Chelmsford City Council administrative area boundary to be a suitably precautionary starting point. • Welcomes the inclusion of Abberton Reservoir Special Protection Area (SPA) and Abberton Reservoir Ramsar site. • Suggests that the HRA should consider the conservation objectives and potential pathways for effects for Dengie (Mid Essex Coast Phase 1) SPA; and Dengie (Mid Essex Coast Phase 1) Ramsar site.
		2. Are there any other threats, pressures or sensitivities that Natural England are concerned about for the European sites identified, and which the Local Plan could significantly influence?	<ul style="list-style-type: none"> • States that the threats, pressures and sensitivities identified in the Initial Scoping Report appear comprehensive and appropriate for each of the European sites identified and welcomes that this is based on the Site Improvement Plans, citations, and the Regulation 33 advice for the Essex Estuaries European Marine Site.
		3. Is Natural England aware of any other data sets (e.g. visitor survey data) or ongoing studies that may be relevant to the HRA of the Local Plan?	<ul style="list-style-type: none"> • Highlights that, whilst outside of the current study area, a European sites monitoring strategy for Colchester, Braintree and Tendring Councils may include some information on the Blackwater Estuary which would be relevant to the Chelmsford HRA. • Possible information regarding general patterns of visitor behaviour may become available in due course.
		4. Does Natural England think that any of the European sites could be reasonably 'screened out' of further assessment, based on the characteristics and sensitivities of their interest features (e.g. Foulness (Mid-Essex Coast Phase 5) SPA / Ramsar)?	<ul style="list-style-type: none"> • Suggests that those parts of the Thames Estuary and Marshes SPA and Ramsar site south of the River Thames can be screened out from further assessment.

Ref	Consultee	Consultation Question/Issue	Consultee Response Summary
		5. Does Natural England broadly agree with the initial assessment of the likelihood of effects on European sites as a result of the Local Plan (based on equivalent plans locally, recognising that the detail of the Local Plan is not yet established and will be subject to review)?	<ul style="list-style-type: none"> • Generally agrees that the Local Plan will not directly influence or control development outside of the Chelmsford City Council administrative area, hence 'direct' effects will not therefore occur for most sites. • Also agrees that 'in-combination' effects with other local plans may be possible. • Suggests that a detailed evidence based assessment will be required to test the potential effects of the Local Plan alone and in-combination with development being delivered/proposed for delivery by the adjacent Local Planning Authorities.
		Coastal Squeeze	<ul style="list-style-type: none"> • Agrees that this issue relates largely to those sites associated with the Crouch and Roach estuaries, where the Local Plan will have a direct influence on development. • Considers that a review of the emerging allocation and planning policies will be key to avoiding adverse impacts on these sites.
		Water Quality	<ul style="list-style-type: none"> • Agrees that downstream sites are most likely to be influenced by changes in water quality arising through plan proposals. • Suggests that the HRA should include sufficient evidence, obtained through liaison with relevant bodies such as Anglian Water and the Environment Agency, to demonstrate that wastewater treatment works and associated infrastructure have sufficient capacity to ensure no adverse effect on water quality.
		Water Supply	<ul style="list-style-type: none"> • Suggests that sufficient evidence to demonstrate that growth in Chelmsford is unlikely to have an impact on Abberton Reservoir will need to be provided to inform the HRA. • The proposal to ensure adverse effects are avoided with appropriate co-ordination of development and infrastructure upgrades and the use of robust planning policies is supported.
		Recreational Pressure	<ul style="list-style-type: none"> • Agrees that in combination with other plans, the effects of increased recreational pressure relate particularly to Blackwater estuary and the Crouch and Roach estuaries. • Suggests that a detailed evidence based assessment will be required to test the potential effects of proposed development in the Local Plan alone, as well as in-combination with development through other projects and plans. • Considers that that significant increases in recreational pressure on more distant sites as a result of the Local Plan appear unlikely, although sufficient evidence will need to be provided to demonstrate this. • States that where adverse effects are predicted, appropriate mitigation measures will need to be identified to sufficiently address these. • Except for the joint study being undertaken by Colchester, Braintree and Tendring Councils, mentioned previously, Natural England is not aware of any specific studies of recreational pressure on the Mid-Essex estuaries suite of sites. • Suggests that the most likely effects of urbanisation through the Local Plan are likely to be associated with increased recreation such as vandalism, fly-tipping and dispersal of invasive species and that these effects to be considered through the HRA.

Ref	Consultee	Consultation Question/Issue	Consultee Response Summary
			<ul style="list-style-type: none">States that the scale, nature and location of development being proposed through the Local Plan suggests that effects on European sites through atmospheric pollution are unlikely. This should be demonstrated through the HRA.

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