

Chelmsford Draft Local Plan: Preferred Options Consultation Document

Sustainability Appraisal Report and Habitats Regulations Assessment Report - Feedback Report

1. Introduction

1.1 Chelmsford Draft Local Plan: Preferred 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 (the City Area) out to 2036 and where this growth will be located. It will also contain planning policies and land allocations.

The first stage in the development of the Local Plan was the publication of the Chelmsford Local Plan Issues and Options Consultation Document (the Issues and Options Consultation Document) that was consulted on between 19th November 2015 and 21st January 2016. The Issues and Options Consultation Document set out, and sought views on, the planning issues that face Chelmsford over the next 15 years and options for the way they could be addressed in terms of the amount and broad location of future development in the City Area.

Following consideration of the comments received as part of consultation on the Issues and Options Consultation Document, ongoing engagement and further evidence base work, the Council selected its preferred options for the Local Plan. These formed the Chelmsford Draft Local Plan: Preferred Options Consultation Document (the Preferred Options Consultation Document). The Preferred Options Consultation Document included the following key parts:

- ▶ Local Plan Strategic Priorities, reflected in the Vision and Spatial Principles;
- ▶ the preferred Local Plan options in terms of the amount of growth (development requirements) and broad location growth (Spatial Strategy);
- ▶ proposed site allocations to deliver the preferred options across three Growth Areas; and
- ▶ plan policies including development requirements for proposed site allocations.

The Preferred Options Consultation Document was published for consultation between 30th March and 11th May 2017.

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

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

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 appraisals of the Issues and Options Consultation Document and, subsequently, the Preferred Options Consultation Document, focusing on the key plan elements listed in **Section 1.1**.

The findings of the SA of the Preferred Options Consultation Document were presented in a SA Report that was published for consultation alongside the Preferred Options Consultation Document in March 2017.

1.3 Habitats Regulations Assessment

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).

Alongside the SA, a HRA providing a preliminary conclusion on the likely effects of the Local Plan was undertaken based on the policies and proposals contained in the Preferred Options Consultation Document. The findings of this assessment were presented in a HRA Report that was also published for consultation in March 2017 alongside the Preferred Options Consultation Document.

1.4 This Feedback Report

This Feedback Report provides a summary of the consultation responses received to the SA Report and HRA Report. 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 to the SA Report;
- ▶ **Section 4:** contains a schedule of responses made to the HRA Report.

2. Consultation Overview

2.1 Responses

A total of 63 respondents provided comments on the Preferred Options Consultation Document SA Report and its Non-Technical Summary (although it should be noted that in many instances, the response received principally related to the Preferred Options Consultation Document itself as opposed to the SA Report).

Table 2.1 provides a breakdown of the type of respondent.

Table 2.1 Type of SA Report Respondent

Type of Respondent	Number of Respondents*
Parish/Town Councils or adjoining local authorities	3
Developers or Representatives	10
Other Agencies and Authorities	3
Members of the public	47

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).

A total of nine respondents provided comments on the Preferred Options Consultation Document HRA Report (although again, the majority of the response received principally related to the Preferred Options Consultation Document itself as opposed to the HRA Report). **Table 2.2** provides a breakdown of the type of respondent.

Table 2.2 Type of HRA Report Respondent

Type of Respondent	Number of Respondents*
Parish/Town Councils or adjoining local authorities	0
Developers or Representatives	2
Other Agencies and Authorities	1
Members of the public	6

2.2 Main Issues Raised

SA Report

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

- ▶ Proposed amendments to the SA Framework and site appraisal criteria;
- ▶ The findings of the appraisal with regard to specific site allocations and reasonable alternatives;
- ▶ The appraisal of the Preferred Spatial Strategy and reasonable alternatives;
- ▶ The need to take into account information submitted by developers in the appraisal of sites.

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

HRA Report

The principal issues in respect of the HRA Report were raised by Natural England and relate to:

- ▶ Effects associated with increased visitor pressure on European sites;
- ▶ Air quality impacts;
- ▶ Urbanisation effects;
- ▶ Water quality and quantity;
- ▶ Mitigation.

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

3. Schedule of Responses to the Sustainability Appraisal Report

Ref	Consultee	Consultee Response Summary	Response/Action
1	Debbie Mack, Historic England	Welcomes the section on cultural heritage at 3.12 of the Sustainability Appraisal (SA) Report but suggest that the heading might more appropriately be the 'Historic Environment'.	Disagree. The reasons for requesting 'cultural heritage' to be renamed 'historic environment' are understood; however, given that both the SA Scoping Report and the Issues and Options SA Report refer to 'cultural heritage', changing the nomenclature now would risk confusing the audit trail and could make the SA less accessible to anybody wishing to understand its development alongside the Local Plan. Further, the term 'cultural heritage' reflects that adopted in the Environmental Assessment of Plans and Programmes Regulations 2004 and the Strategic Environmental Assessment (SEA) Directive. For these reasons, the term 'cultural heritage' will continue to be used. No change.
		Welcomes the key sustainability issues identified in the SA Report and guide questions. Notes the commentary with respect to the protection of the historic environment at paragraphs 5.5.28 - 5.5.30 and also in Table F2 Section 13.	Comment noted. No change.
		Recommends that the following sites should more appropriately be appraised as having minor negative effects on cultural heritage: - Navigation Road Sites - Essex Police HQ - Meteor Way - Former Chelmsford Electrical and Car Wash New St - Waterhouse Lane Depot and Nursery - Eastwood House - Rivermead Industrial Estate	Comment noted. The sites listed in this response will be re-considered as part of the SA of the Draft Pre-Submission Local Plan to take into account the information provided by Historic England where there is considered to be sufficient evidence available to justify any changes to the scoring of the sites against SA Objective 13 (Cultural Heritage).
		Asks whether the Special Policy Areas should be considered?	Comment noted. Special Policy Areas have been appraised (see Appendix I of the SA Report). No change.
2	Steve Roe, Natural England	Recommends that the guide question under SA Objective 1 (Biodiversity) be amended to read ' <i>will it provide opportunities for people to access the natural environment including green and blue infrastructure whilst protecting designated sites from the impacts of increased recreational pressure</i> ' and that the key issues (Table 3.12) and site appraisal criteria (Appendix G) should also be revised to reflect this. Also states that the SA Framework should consider the ecological	Comment noted. At this stage in the SA process, it is not considered appropriate to amend the SA Framework, which has been subject to full consultation at the scoping stage and revised as a result of the responses received. It is noted that at the Issues and Option stage, Natural England considered that the objectives used to assess the impacts of the Local Plan were appropriate. It should also be noted that

Ref	Consultee	Consultee Response Summary	Response/Action
		network (as well as in Table 2.2) and that it should include a specific objective relating to the protection and enhancement of biodiversity including green infrastructure provision.	the SA Framework includes a guide question relating to green infrastructure provision under SA Objective 1 (Biodiversity). No change.
		<p>Advises the Council to ensure that indicators proposed to monitor the effects of the Local Plan are on biodiversity, and not biodiversity <i>per se</i>. The following specific recommendations are made:</p> <ol style="list-style-type: none"> 1. % of SSSI in favourable condition, etc. Recommends not using SSSI condition as an indicator. States that a better indicator would be impacts (both direct and indirect) on designated sites, e.g. "<i>Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance</i>". 2. Change in area of designated biodiversity sites. Recommends using alternative indicators such as "<i>Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance</i>" or "<i>Hectares of biodiversity Priority Habitat delivered through strategic site allocations</i>". <p>States that the following indicators may also be appropriate:</p> <ol style="list-style-type: none"> 1. Net-gain in biodiversity. A suitable indicator may be "<i>Hectares of Priority Habitat delivered through strategic site allocations</i>" and/or "<i>Percentage of major developments generating overall biodiversity enhancement</i>." 2. Net-gain in accessible natural greenspace. Suitable indicators may be "<i>Hectares of accessible open space per 1000 population</i>" and/or "<i>Percentage of the borough population having access to a natural greenspace within 400 metres of their home</i>". 	<p>Comment noted. The monitoring framework contained in Appendix J to the SA Report will be reviewed taking into account the availability of the indicators suggested by Natural England. The updated monitoring framework will be presented in the Draft Pre-Submission Local Plan SA Report.</p>
		With regard to Growth Site 9 (South of Bicknacre), notes that significant negative effects have been identified on SA Objective 1 (Biodiversity) and advises that for mitigation, this policy should include specific protection in respect of Thrift Wood Site of Special Scientific Interest (SSSI).	Comment noted. Revisions to policy relating to South of Bicknacre to address impacts in respect of Thrift Wood SSSI will be considered by the Council in preparing the Draft Pre-Submission Local Plan.
		Notes that no mitigation in respect of Strategic Growth Site 8 (North of South Woodham Ferrers) has been identified and considers it to be premature to conclude this due to its close proximity (~400m) to the Crouch and Roach Special Protection Area and Ramsar site.	Comment noted. The initial appraisal of North of South Woodham Ferrers contained in Appendix G to the SA Report identified the potential for significant negative effects on biodiversity. The subsequent appraisal of the associated policy for this site identifies that the policy includes a specific requirement relating to the mitigation of potential impacts on biodiversity but that until the detail of such mitigation is known, effects are considered to be negative with the potential to be significant in respect of the Crouch and Roach Estuaries SSSI and SPA. This conclusion will be reviewed as part of the SA of the Draft Pre-Submission Local Plan, taking into account the Habitats Regulations

Ref	Consultee	Consultee Response Summary	Response/Action
			Assessment (HRA) and any additional mitigation will be identified as appropriate.
		With regard to Strategic Growth Site 5 (Moulsham Hall and North of Great Leighs), states that the River Ter SSSI is located ~1.7km to south and that any development or activity that restricts natural processes is likely to damage the interest features of the SSSI. Notes that the site is assessed as having a significant negative effect on biodiversity (SA Objective 1) and advises that the SA assessment includes the River Ter SSSI. States that direct damage can be caused by activities such as the construction of structures and defences, or the removal of material such as sand and gravel. In some instances, sites are likely to be damaged by tree planting which can restrict natural processes by stabilising the soil. Changes in drainage patterns can also damage active process sites.	Comment noted. The appraisal of Moulsham Hall and North Great Leighs (PF33/43) will be reviewed as part of the SA of the Draft Pre-Submission Local Plan in order to consider effects on the River Ter SSSI.
		States that it is unclear whether site specific agricultural land classification (ALC) data has been used to inform the SA. Where no such information for the sites exists, the respondent states that the Council should specify the need for those proposing sites to undertake a suitable site-specific ALC survey to inform the assessment process. Advises that the Council should: 1. Include a specific policy on Soils and BMV land; 2. Ensure clear decision-making for lower quality agricultural land being used in preference to Best and Most Versatile agricultural land; and 3. Strengthen the role of green infrastructure within development.	Comment noted. Site specific agricultural land classification data has not been used to inform the SA. Provisional Agricultural Land Classification mapping produced by Natural England has been used to indicate the likely agricultural land quality of sites. Undertaking site specific ALC assessments to inform the Local Plan/SA is not considered to be proportionate to a strategic level assessment or feasible. No change.
		States that effects on the Epping Forest Special Area of Conservation (SAC) from increased transport movements should be screened into the HRA. This, in turn, would affect the assessment of air quality presented in the SA.	Comment noted. Please note that Natural England's comments provided in respect of the HRA including on air quality impacts have been considered separately. The findings of the HRA of the Draft Pre-Submission Local Plan will be considered and reflected in the SA of the document.
		Notes that distance thresholds alone have been used with thresholds relating to relative proximity to designated sites. States that whilst it is true that proximity to a bio- or geo-diversity asset is a consideration, advises that the source-receptor-pathway model should be used as thresholds to determine potential impacts rather than basing this screening on proximity alone. States that Natural England has produced an Impact Risk Zone dataset to assist the screening of planning proposals and the data can be used to assist the assessment of site allocation proposals as well as individual development management applications.	Comment noted. The site appraisal criteria has been confirmed following consultation on the SA Scoping Report and it is noted that no changes to the criteria were requested by Natural England at that time. In recognition of the potential for nature conservation sites to be affected by proposals beyond their boundaries, distance thresholds have been adopted in the site appraisal criteria on a precautionary basis. In consequence, it is considered that the principle of source-receptor-pathways has already been considered. Changes to the site criteria at this stage would require the re-assessment of all proposed site allocations and reasonable alternatives;

Ref	Consultee	Consultee Response Summary	Response/Action
			<p>however, it is not clear if this would result in a material change to the assessment and it is therefore not considered to be appropriate.</p> <p>No change.</p>
3	Mrs Linda Cusick	Would like further details with regard to who the consultants are that undertook the SA.	Comment noted. Amec Foster Wheeler Environment and Infrastructure UK Ltd (Amec Foster Wheeler) has been commissioned to undertake the SA of the emerging Local Plan.
4	Mr David Hutchinson	Requests further details regarding the need for permanent new Gypsy and Traveller pitches and Travelling Showpeople plots. The response also queries whether the road infrastructure will be sufficient to cope with increased housing.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
5	Mr D Marsh	<p>States that the sustainability criteria are being applied both inconsistently and too restrictively, creating additional pressure for Green Belt development. Highlights that sites are sometimes said to be unsustainable even though there is property adjacent to the site which must necessarily have been sustained for many decades. States that the Council is obliged by national policy to use land outside Green Belt first. Considers that the sustainability criteria need to be relaxed to accord with policy.</p> <p>Also states that there will be more pressure to build on Green Belt if sustainability criteria and the definition of brownfield and infilling continue to be applied perversely and restrictively.</p>	<p>Disagree. All sites have been assessed equally against the 14 SA objectives as part of the SA Report. The proximity of sites to existing built development has been considered (particularly when assessing the effects of proposed site allocations on landscape and townscape); however, the proximity of a site to existing built development is not unto itself sufficient to show that development would be sustainable.</p> <p>Brownfield land (also referred to as 'previously developed land') has been identified and considered in accordance with the definition set out in the National Planning Policy Framework (NPPF).</p> <p>No change.</p>
6	Mr Steven Hoare	Requests that consideration be given to the provision of bungalows for the elderly and disabled. States that this would also 'free up' larger homes.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
7	Mrs Beryl Sweeney	States that the consultee does not have copies of the maps referred to as part of the consultation.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
8	Suzanne Bangert, Terrence O'Rourke	Respondent is pleased to see that in order to ensure equality within the site appraisals, the SA has been undertaken without taking into account associated site allocation policies, or mitigation provided by other Local Plan policies. However, states that in reviewing the site appraisals in Appendix G, it appears the assessment has not considered the	Comment noted. Developer supplied information will be reviewed in preparing the SA of the Pre-Submission Local Plan and the SA updated where necessary. .

Ref	Consultee	Consultee Response Summary	Response/Action
		<p>supporting information submitted by the site promoters. In the case of the Hammonds Farm site, this includes extensive details on the elements the scheme would deliver (e.g. schools, employment, district and local centres, open space etc) and identifies the environmental information used to determine potential development areas (for built development) with the wider site boundary.</p> <p>Taking into account this information, the respondent has provided a re-appraisal of the alternative spatial strategy and site allocation as well as an appraisal of a proposed new policy for the site. This concludes that the performances of the Alternative Spatial Strategy (inclusive of the Hammonds Farm site) and the Preferred Spatial Strategy is the same and that the site generally scores comparably with the other strategic sites in Growth Areas 2 and 3, and for some objectives notably better than many of the other site specific policies.</p> <p>States that whilst the Hammonds Farm site has been assessed to some degree, there are significant shortfalls in the way it has been considered (not least as none of the site's access strategies appear to have been tested), which puts it at an unfair disadvantage in comparison to the sites that have been selected. Also notes that for sites taken forward as the preferred allocations, a subsequent assessment within the SA of the site-specific policy enables the benefits of provision, such as schools or local centres, and consideration of any mitigation, such as appropriate landscape or safeguarding land. States that as Hammonds Farm is not within the preferred option, there is no supporting policy for the site so a comparison on a policy basis is very speculative.</p>	<p>The appraisal presented in this response is welcomed and will be considered in undertaking the SA of the Draft Pre-Submission Local Plan.</p>
		<p>Considers it extremely disappointing that the scenarios which included Hammonds Farm that were tested through the Chelmsford Strategic Model, appear to provide a limited level of the supporting highway infrastructure identified by Hammonds Estates (HEst). It is also considered that the draft Local Plan fails to recognise the substantial sustainability benefits that could be achieved by locating new growth in locations which are close to areas of economic activity and existing or planned transport infrastructure, such as; the City Centre and stations, the Sandon Park and Ride, the A414 corridor, the A12 corridor; and Beaulieu Park Railway Station. This would maximise the use of existing infrastructure and maximise the value of the investment that Chelmsford has already secured.</p>	<p>Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.</p>
		<p>Does not agree that the Hammonds Farm option will offer reduced accessibility to key services, facilities and employment opportunities and highlights that the North East Chelmsford site is in fact further from the City Centre area than development at Hammonds Farm would be. It is accepted that Hammonds Farm is currently a short distance (950m) from the edge of the Chelmsford residential suburb of Great Baddow;</p>	<p>Comment noted. The assessment findings reflect the physical detachment of the Hammonds Farm site from the urban area. Notwithstanding this, the assessment does highlight that a new settlement presents an opportunity to deliver a new sustainable neighbourhood with associated services and facilities.</p> <p>No change.</p>

Ref	Consultee	Consultee Response Summary	Response/Action
		however, with the proposed development of locations 3a, 3b and 3c, this distance will fall to less than 300m.	
		States that development at Hammonds Farm has the ability to provide a park and ride site, additional bus services and new pedestrian and cycle links to the city centre. Five hectares of employment land will be provided on the site and it is proposed that the new development will incorporate a district centre (shops, post office, community space and potentially a doctors' surgery) and two local centres. The scheme will also provide primary and secondary educational facilities and recreational open space (including formal sports provision). States that these elements of the proposal will significantly reduce the need for future residents to travel to Chelmsford City Centre for the everyday needs.	Comment noted. Developer supplied information will be reviewed in preparing the SA of the Pre-Submission Local Plan and the SA updated where necessary.
		Notes that paragraph 5.3.100 of the SA Report refers to the Hammonds Farm site being promoted by 'landowners' whereas it should be noted that Hammonds Farm is being promoted by a single landowner (HEst).	Comment noted. Reference to 'landowners' in the SA Report will be amended as per this response in the Draft Pre-Submission Local Plan SA Report.
		Notes that paragraph 5.4.12 of the SA Report states, " <i>The development of the majority of the sites within Growth Area 2 would involve the reuse of brownfield land and in consequence, significant positive effects have been identified in respect to landuse (SA Objective 7).</i> " The validity of this statement is questioned. Highlights that the NPPF definition of previously developed land (brownfield land), excludes land that has been developed for minerals or waste disposal by landfill purposes where provision has been made for restoration. In terms of the development areas, it would appear that the majority is provided on greenfield land. Therefore, it is suggested that this statement is misleading and as such its assessment in this way (as a significant positive effect) may be inappropriate.	Comment noted. The land use status of sites within Growth Area 2 will be reviewed and confirmed as part of the SA of the Draft Pre-Submission Local Plan.
		Notes that paragraph 5.5.8 of the SA Report highlights that Strategic Policy S12 includes a range of transportation infrastructure development requirements including a Chelmsford North East By-pass and that it goes on to highlight that " <i>Once implemented, these measures will help to mitigate the adverse impacts of new development</i> ". States that sites in Growth Area 2 (to the north of Chelmsford) are heavily reliant on the delivery of the North East Chelmsford By-pass and that this road scheme has been identified in strategic transport plans for over 10 years and is subject to a safeguarded route (albeit currently under review) but has yet to be implemented and the time frame for delivery has not been determined. States that other key related transport infrastructure into which North East Chelmsford will connect include the second radial distributor road and the various infrastructure measures associated with the Beaulieu Park development. Highlights that the delivery of the Beaulieu Park infrastructure is linked to a series of trigger points based	<p>Comment noted. The SA has been undertaken on the assumption that Local Plan proposals will be implemented. This is considered to be appropriate and reflects the expectation that the implementation of Local Plan policies, including those related to infrastructure delivery and the development of specific sites, and mechanisms including the Infrastructure Delivery Plan will ensure the timely delivery of infrastructure to support new development.</p> <p>No change.</p>

Ref	Consultee	Consultee Response Summary	Response/Action
		on the build out rate of the development, which has been significantly slower than anticipated. States that there is no explanation as to the implications on the sustainability scoring should the North East Chelmsford By-pass and other key infrastructure not progress as suggested and tested in the transport modelling.	
		States that the justification for excluding Hammonds Farm appears to have taken no account of the many benefits resulting from development of the site. Considers that there is a notable difference when the narrative for Hammonds Farm is compared to the reasons given for the selection of the sites taken forward into the preferred option, including for Location 4 and that the justification for its exclusion relies heavily on the apparent lack of support in the evidence base for the Preferred Options Consultation Document, notably in respect to landscape/townscape and transport.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
		Disputes the implication within the justification for Location 4 that the North East Chelmsford site will provide the North East Chelmsford By-pass. HEst would welcome clarification on this matter.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
		In reviewing the Landscape Sensitivity and Capacity Assessment, HEst concludes that for the North East Chelmsford area of search, the landscape capacity has been overestimated. States that if the North East Chelmsford area of search had been scored correctly then the SA of the Preferred Spatial Option would have concluded that the Hammonds Farm alternative spatial strategy performed equally in landscape terms to North East Chelmsford (Location 4).	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
9	Mrs Anne Richman	Queries why no new secondary schools are proposed at South Woodham Ferrers. Also identifies that existing train services are full and queries the need for new traveller sites.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
10	Miss Nichole Penfold, Gladman Developments Ltd	States that SA is a systematic process that needs to be undertaken at each stage of the planning process.	Comment noted. The SA is being undertaken iteratively alongside the development of the Local Plan. Options are being treated equally through the SA and the reasons for the selection of preferred options and for the rejection of alternatives have been set out in the SA Report.
11	Ms Lynn Ballard, Broomfield Parish Council, Chignal Parish Council, Little Waltham Parish Council, Writtle Parish Council and Newlands Spring Residents Association	Notes that the SA Report highlights that the best and most versatile Grade 2 agricultural land lies to the north/west of the Chelmsford Urban Area, whilst land to the south and east of the City is of lower grades (3 or 4) and is better connected to major transport corridors and employment opportunities. Also notes that the SA goes on to argue at paragraph 3.7.12 that, without a Local Plan, the Council would have less control	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.

Ref	Consultee	Consultee Response Summary	Response/Action
		<p>over where development takes place which may result in the loss of the best and most versatile agricultural land.</p> <p>Considers that the growth proposed in the Local Plan is allowing for significant development on areas of higher grade agricultural land and that there is insufficient evidence provided to justify the permanent loss of Grade 2 land in the proposed growth locations to the west and north of Chelmsford when there remain options in alternative locations with lower grade land, which would make more sustainable alternatives. States that the site allocations set out in the Local Plan do not therefore 'minimise the loss of the best and most versatile agricultural land to ensure future production' and do not advance overriding 'other planning factors' such as sustainability and general suitability for doing so.</p>	<p>The SA notes that the Preferred Spatial Strategy seeks to maximise the use of brownfield; however, development requirements mean a large area of greenfield land is required to meet development needs (for a total of 13 proposed site allocations, this would include land classified as grades 1, 2 or 3 agricultural land). It should also be noted that agricultural land quality is just one factor to be considered in the appraisal of the Local Plan.</p>
12	The North East Chelmsford Garden Village Consortium	<p>Agrees with the overall conclusions of the SA Report but considers that the appraisal has 'over-valued' the merits of Hammonds Farm as a reasonable alternative and states that the SA of the Draft Pre-Submission Local Plan should re-assess the comparative merits of this site and North East Chelmsford which should be assessed in a more objective way than at present. With regard to Hammonds Farm, the respondent states that:</p> <ul style="list-style-type: none"> there is no evidence to support the conclusion that that development of a new settlement at Hammonds Farm would present an opportunity to deliver a new sustainable neighbourhood, which could help to offset adverse effects in this regard and deliver some sustainability benefits, such as reduced traffic in the Chelmsford Urban Area; a negative effect not considered in relation to Hammonds Farm is that there are no current proposals to improve the A12 between Boreham Interchange and the B1007. Therefore, the major road and public transport network will be far less suitable for the proposed major development of Hammonds Farm; a large part of the site is now proposed as a Green Corridor in the Preferred Options Consultation Document. <p>With regard to North East Chelmsford, the respondent states that:</p> <ul style="list-style-type: none"> a particular advantage is that this development will allow the Chelmsford North East By-pass to be constructed in phases. This will also serve the proposed growth of a further 1,100 new homes at Great Leighs, and proposed areas of growth in Braintree. Additionally growth at North East Chelmsford will be served by the committed new Beaulieu Station. These positive effects are not considered in the SA. sand and gravels within the former site can be used for the new development without the need for importing such minerals from other quarry sites. This has significant benefits in reducing HGV movements and associated air pollution. 	<p>Disagree. An objective assessment of spatial strategy options and potential site allocations has been undertaken as part of the SA.</p> <p>With regard to the appraisal of the Urban Focus with Growth at Hammonds Farm and Key Service Settlements alternative spatial option, it is considered that a development of the scale of Hammonds Farm could potentially enable the delivery of a new sustainable neighbourhood and this has been reflected in the appraisal. The potential for negative effects in respect of transport have also been identified, together with uncertainty regarding the deliverability of the transportation infrastructure necessary to bring forward the development.</p> <p>The location of Hammonds Farm within a proposed Green Corridor is noted; however, this designation forms part of the Preferred Spatial Strategy which is assessed separately.</p> <p>With regard to the appraisal of the Preferred Spatial Strategy/North East Chelmsford, this has identified the benefits associated with the delivery of the Chelmsford North East By-pass (see paras 5.3.4, 5.4.10 and Appendix I of the SA Report, for example) and the new Beaulieu Station (see Appendix F).</p> <p>The assessment of North East Chelmsford has identified its location within a Sand and Gravel Mineral Safeguarding Area. However, the potential to utilise sand and gravel as part of the development is noted and will be considered in undertaking the SA of the Draft Pre-Submission Local Plan.</p>

Ref	Consultee	Consultee Response Summary	Response/Action
13	Hopkins Homes	States that the SA underestimates the scale of the potential sustainability benefits associated with the development of Land East of Chelmsford/North of Great Baddow and overstates some or the negative effects identified. Also states that the SA should take a holistic approach to the proposed development of the site, and account for the details of the proposed policy that will guide its development. In this regard, the respondent considers that the appraisal has not taken into account the policy provisions of the Preferred Options Consultation Document with respect to education, open space and cultural heritage in particular.	<p>Disagree. Appendix G to the SA Report contains the initial appraisal of proposed site allocations. At Appendix I, those policies that relate to specific sites have also been appraised by taking forward the findings of the initial site assessment and applying the associated development requirements (as set out in the related policies). This has enabled consideration of the extent to which the site policies may help to mitigate adverse effects and enhance positive effects associated with the delivery of the proposed site allocations and, subsequently, the identification of where there would be residual significant effects. In this context, the appraisal of Land East of Chelmsford/North of Great Baddow presented in Appendix I has taken into account positive effects associated with the delivery of a Country Park (with significant positive effects identified in respect of SA Objective 5 (Health and Wellbeing) and the policy appraisal also states that "<i>The measures included within this policy, including (inter alia) improvements to the local highways network, provision for walking and cycling and sustainable modes of transport and requirement for financial contributions to education and other community facilities, will further enhance the positive effects identified during the appraisal of this site in respect of SA Objectives 4 (Sustainable Living And Revitalisation) and 6 (Transport)</i>". To confirm, the appraisal contained in Appendix G identifies neutral effects in respect of water quality and resources (SA Objective 8) for this site, although it is noted that this is incorrectly reported in Appendix I which will be amended in the Draft Pre-Submission Local Plan SA Report.</p> <p>The potential benefits associated with improving access to Sandford Mill are noted and will be considered further in undertaking the SA of the Draft Pre-Submission Local Plan.</p>
14	Mr William Scott	Considers that the level of housing proposed by the Local Plan is too high and that infrastructure (such as the North East By-pass) should be in place before development proceeds.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
15	Mr John Caton	States that South Woodham Ferrers cannot accommodate further growth and that the only sensible possibility would be to extend eastward or north eastward (e.g. to increase other villages), but then traffic would still be an issue. Suggests making a smaller village into a large town with a fast access road to the A130 or delivering a new town of significant size close to the A130. States that proposed improvements to the A132 are senseless.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
16	Mr Gregory Brown	Objects to development at South Woodham Ferrers due to infrastructure constraints.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be

Ref	Consultee	Consultee Response Summary	Response/Action
			included in a separate document which will accompany the next stage of consultation.
17	Mr Stephen Spicer	States that the SA assumes that just because services exist in Key Service Settlements there is capacity to accommodate more development. Also states that existing infrastructure in Danbury is overstretched and unlikely to be able to cope with additional housing in the area and that development will affect local landscape character and biodiversity.	<p>Comment noted. The findings of the SA reflect the potential capacity of higher order/larger settlements to accommodate further growth on the basis of their provision of existing services and facilities including transport links. Policies contained in the Local Plan are also expected to help ensure that sufficient additional infrastructure is delivered to accommodate new development. Notwithstanding this, the SA has identified the potential for adverse effects associated with growth on existing services and facilities, traffic and transport, landscape and biodiversity.</p> <p>No change.</p>
18	Mr Matthew McCarthy	<p>States that the development of Strategic Growth Site 1e would lead to the loss of land valued for its social amenity and lead to congestion/parking issues. Also seeks confirmation that development of the contaminated land would not adversely affect his own property.</p> <p>Considers that a proposal of ~200 homes would have little impact on local housing requirement, given the volume of dwellings under construction at other sites such as North East Chelmsford.</p>	<p>Comment noted. The appraisal of North of Gloucester Avenue (John Shennan) (site PF01) contained in Appendix G to the SA Report has identified the potential loss of open space as having a negative effect on SA Objective 5 (Health and Wellbeing) and adverse impacts on the local road network. However, it should be noted that the associated site allocation policy includes for the rationalisation/retention of formal/informal open space and improved play provision as well as pedestrian/cycle links that will help to mitigate adverse impacts in this regard.</p> <p>No Change.</p>
19	Mr William Scott	States <i>"Impact on wildlife. There are skylarks in the fields north of school lane and south of Moulsham hall?"</i> .	<p>Comment noted. Effects associated with the proposed development of Moulsham Hall and North Great Leigh (site PF33/34) are recorded in Appendix G to the SA Report which identifies a significant negative effect against SA Objective 1 (Biodiversity) due to the close proximity of various sites of importance for nature conservation. The presence of protected species is acknowledged as unknown. It should be noted that the associated policy for this site requires appropriate green buffering to minimise these effects (as reflected in Appendix I to the SA Report).</p> <p>No change.</p>
20	Mr Graham Taylor, Reprohouse Limited	Disagrees with the identified need for a travellers' site at Drakes Lane, Boreham.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
21	Ms Joanna Harte	Disagrees with the identified need for a travellers' site at Drakes Lane, Boreham.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be

Ref	Consultee	Consultee Response Summary	Response/Action
			included in a separate document which will accompany the next stage of consultation.
22	Katie Garratt	Disagrees with the identified need for a travellers' site at Drakes Lane, Boreham.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
23	Mr Mark Chessum	<p>Found the consultation documents difficult to access through the consultation portal.</p> <p>Agrees with the Spatial Principles for the Local Plan but objects to development at Warren Farm on the basis of the loss of Grade 2 agricultural land and increased congestion. Asks: what the Council's contingency is should Warren Farm be no longer available; what budget has been set aside to mitigate congestion through car sharing and walking; and why Hammonds Farm is not being taken forward.</p> <p>Also comments on the lack of consideration given to Brexit in the evidence base for the Local Plan.</p>	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
24	Mr Phillip Moore	Raises a number of concerns with regards to the proposed allocation of Warren Farm, particularly with respect to traffic, air quality and noise, flood risk, schools capacity and healthcare capacity.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
25	Mrs Catherine Frost	Disagrees with the identified need for a travellers' site at Drakes Lane, Boreham.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
26	Miss Beth Dedman	Disagrees with the identified need for a travellers' site at Drakes Lane, Boreham.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
27	Ms Lois Bowser	States that access to open space and the countryside has not been considered from a wellbeing and garden settlement philosophy. Queries the function of green spaces and green wedges.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.

Ref	Consultee	Consultee Response Summary	Response/Action
28	Mrs Janet Osbourne Williams	Raises concern that sustainability criteria and the definition of brownfield and infilling continue to have been applied perversely and restrictively.	Disagree. Brownfield land (also referred to as 'previously developed land') has been identified and considered in accordance with the definition set out in the NPPF. No change.
29	Mrs Laura Dunne	Considers that the Local Plan takes into account the requirements for modern development with concentration in brownfield sites and those which have good links to existing infrastructure including transport, health, education and retail.	Comment noted.
30	Judge John Burrow	States that the North East By-pass should be in place before housing is completed and that there should be no housing adjacent to the Little Waltham built up area boundary.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
31	Mr Gordan Ingram	States that the local information, the Historic Environment Record and Sites and Monuments Record, should be considered as a part of the SA with respect to the Warren Farm site (West Chelmsford).	Comment noted. Effects on heritage assets have been considered in the site appraisal contained at Appendix G to the SA Report. No change.
32	Mr Raymond Towey	Asks whether consultee views on the Local Plan will be given due consideration.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
33	Mrs Sarah Dudley	Opposes the proposed Warren Farm (West Chelmsford) allocation because of the lack of infrastructure to support the increase in traffic on Lordship Road and Roxwell Road (due to a single entrance to the site) and lack of schools, GPs, and other factors that directly impact the parish of Writtle.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
34	Mr Jason Kavanagh	Raises concern regarding coalescence between Chelmsford City and the surrounding villages. Also raises concern that Broomfield and Writtle will coalesce into a single settlement/area.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
35	Mr Daniel Moynihan	Considers that the Local Plan would lead to "traffic chaos".	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.

Ref	Consultee	Consultee Response Summary	Response/Action
36	Mr John Smith	Questions the level of detail in the SA and also whether Chelmsford City Council has considered the outcomes of the SA.	<p>Comment noted. The level of detail contained in the SA Report is considered to be appropriate. The scope of the appraisal and content of the SA Report reflect the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and were subject to consultation at the scoping stage of the SA process.</p> <p>The SA process is being undertaken iteratively alongside the development of the Local Plan and as set out in Section 5 of the SA Report, the findings of the SA of the Issues and Options Consultation Document have informed the Council's selection of preferred options and rejection of alternatives. In this context, the findings of the SA of Preferred Options Consultation Document will also be taken into account by the Council in preparing the Draft Pre-Submission Local Plan.</p> <p>No change.</p>
37	Mr Robert Allighan	States that "earlier comments on substance behind these statements needs clarification."	<p>Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.</p>
38	Mr Stephen Hook	<p>States that the SA only considers South Woodham Ferrers in the context of it being a part of Chelmsford City. States that the appraisal needs to reflect the settlement's physical isolation from Chelmsford. As a result, the respondent states that the current conclusions drawn by the SA for South Woodham Ferrers will need to be modified, particularly if development to the north of the town proceeds without the B1012 being replaced by a 'proper' 'boundary' main road (e.g. extension of the A132). Without this infrastructure, the respondent states that it will be impossible for the following SA Objectives to be met:</p> <ul style="list-style-type: none"> SA Objective 3 - states that the local economy in, and to the east of the town, is dependent on the free flow of traffic from cars and vans through to heavy goods vehicles. Considers that the current preferred option for South Woodham Ferrers will result in unacceptable levels of congestion, harming the development of business and industry in the local area. SA Objective 5 – states that road congestion, particularly at the peak local rush hour, will significantly reduce the health and wellbeing of residents through increased pollution due to the stop / start traffic through the town. SA Objective 6 – states that due to the location of the town, many residents and the areas to the east have to commute to work, mostly by car /van. Considers that the current preferred option fails to appreciate the infrastructure required to cope with the proposed growth. 	<p>Disagree. At a strategic level, the appraisal of the Preferred Spatial Strategy has identified the potential for adverse effects on the road network, increased commuting and air quality impacts. However, the assessment also highlights that development may help to maintain existing, and stimulate investment in new, public transport provision and infrastructure improvements including to the A132. Furthermore, it is considered that focusing growth in/adjacent to existing urban areas will help to reduce the need to travel, generating longer term benefits. With specific regard to SA Objective 7, the appraisal has also highlighted the potential for adverse effects on land use/soils associated with the loss of agricultural land including to the north of South Woodham Ferrers.</p> <p>Alongside the appraisal of the Preferred Spatial Strategy, the SA has assessed proposed site allocations (including the site North of South Woodham Ferrers (see Appendix G) and Growth Areas (including Growth Area 3 which includes South Woodham Ferrers). These appraisals have also identified the potential for adverse impacts on the local road network and land use and soils.</p> <p>Overall, it is considered that the SA has adequately assessed effects associated with proposed development at South Woodham Ferrers.</p> <p>No change.</p>

Ref	Consultee	Consultee Response Summary	Response/Action
		<ul style="list-style-type: none"> SA Objective 7 – states that the current preferred option proposes that the development will mainly use good quality agricultural land and that this is not compatible with 'conserve and enhance soils'. 	
39	Mr Robert Stevenson	Respondent is objecting to proposed development in Danbury and the way the Local Plan is written and presented. No specific comment on the SA Report has been made by this respondent.	Comment noted.
40	Mr Steve Jones	Raises concern that infrastructure associated with new development will not be delivered and states that infrastructure should be in place prior to, or at least alongside, new development.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
41	Mr Oliver Spencer, Andrew Martin - Planning Ltd on behalf of Croudace Homes	<p>Objects to paragraphs 5.3.85 and 5.3.86 in the SA Report on the basis that they improperly consider alternative spatial options. Notes that the commentary rejects Options 2 and 3 in the Chelmsford Local Plan Issues and Options Consultation Document partly on the grounds that promoting growth in a 'small settlement' like Rettendon Common would be contrary to the Settlement Hierarchy but highlights that the Issues and Options Consultation Document did not propose any growth at Rettendon Common. Notes that Options 2 and 3 did propose growth in the 'Service Settlement' of Rettendon Place, but highlights that this is an entirely separate settlement and one that occupies a higher place on the Settlement Hierarchy.</p> <p>Considers that this error indicates that:</p> <ul style="list-style-type: none"> (i) the various Spatial Options have not been assessed accurately; (ii) Options 2 and 3 appear to have been incorrectly rejected in the SA process; and (iii) the subsequent decisions made in the Local Plan Preferred Options Consultation Document are not supported by robust evidence. <p>Also states that the site assessment contained in Appendix G of the SA Report fails to assess land to the north and east of Rettendon Place (15SLAA40), despite this site featuring in two of the three Spatial Options at the Local Plan Issues & Options stage.</p>	<p>Comment noted. Reference to Rettendon Common in paragraphs 5.3.85 and 5.3.86 of the SA Report is a typo and this should read Rettendon Place. This will be amended in the Draft Pre-Submission Local Plan SA Report.</p> <p>For the avoidance of doubt, the appraisal contained in the Issues and Options Consultation Document SA Report, and which is referred to in the Preferred Options Consultation Document SA Report, has correctly appraised Spatial Strategy Options 2 and 3, including development at Rettendon Place. This appraisal is therefore considered to be correct and does not invalidate the conclusions of the Issues and Options SA Report nor has it materially affected the Council's selection of the Preferred Spatial Option and rejection of alternatives. The decision to progress Spatial Strategy Option 1 reflects the objective to focus development within the top two tiers of the settlement hierarchy.</p> <p>Site 15SLAA40 has not been subject to assessment as part of the SA process. As Spatial Strategy Options 2 and 3 have not been progressed, this site would not be consistent with the Preferred Spatial Strategy and, therefore, is not considered to be a reasonable alternative for the purposes of the SA.</p>
42	Mr David Callow	No specific comments made in respect of the SA Report.	Comment noted.
43	Mrs Michelle Rees	Objects to the proposed allocation of the Meteor Way site (site PF13) and considers that the key stakeholders associated with this site, including the charity that developed it, were not consulted on the proposals.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
44	Mr Nigel Seager	Is broadly supportive of the SA Report.	Comment noted.

Ref	Consultee	Consultee Response Summary	Response/Action
45	Mr Steven Moore	No comment.	Noted.
46	Mrs Jessica Dawson, Great & Little Leighs Parish Council	<p>With regard to Land East of BanTERS Lane (15SLAA16), the respondent notes the findings of the assessment.</p> <p>With regard to site 15SLAA28 (Land East of 52 Main Road), notes that the assessment states that the nearest supermarket is 327m away which is considered to be incorrect. Considers that the local store noted cannot be classed as a supermarket. Also highlights that the nearest primary school is full.</p> <p>With regard to site CFS105 (Land East of Nos 170 – 194 Main Road), agrees that this site is within 100m of two Nature Reserves and actually butts onto these in at least two places. Considers that light, noise and air pollution will impact on these sites.</p> <p>With regard site PF33/34 (Moulsham Hall and Great North Leighs), the respondent notes the assessment findings.</p> <p>Considers that the findings of the SA indicate that the sites East of Main Road and North East of BanTERS Lane will have a negative effect on Great Leighs with light, noise and traffic pollution, lack of open space, pressure on health services and schools and changing the very local distinctiveness of Great Leighs which the Council states is high on its agenda but is not borne out by this Local Plan.</p>	<p>Comments noted. With regard to the appraisal of site 15SLAA28, supermarkets are taken to include local stores for the purposes of the SA. This will be clarified in the Pre-Submission SA/SEA Report.</p> <p>It should be noted that the Council does not propose to allocate sites 15SLAA17 and 15SLAA28.</p> <p>No change.</p>
47	Mr Gordon Burgess	<p>The respondent raises the following five points:</p> <ol style="list-style-type: none"> 1. Would wish to see development in Boreham limited to the 145 dwellings proposed; 2. Supports the designation of the Green Corridor on land south and west of Boreham Village, although asks that policies are extended to identify the types of development which would not be permitted in these areas (to avoid speculative development); 3. Considers that development of Growth Area 2 must be accompanied by new road infrastructure including the North East By-pass; 4. Objects to the amendments to the defined settlement boundary of Boreham Village to include Porters Park and Orchard Cottages on Main Road as set out in the '<i>Urban Area and Defined Settlement Boundary Review</i>'. Considers that there is no justification for this change and that by including these properties within the village envelope, it opens up the opportunity of speculative developers coming forward with proposals to the south side of Main Road possibly connecting up to the additional 145 houses proposed to the East of Plantation Road; 5. Objects to the proposed Gypsy, Travellers and Showpeople site on land on the corner of Drakes Lane and Boreham Road. Considers that the proposal would lead to an unrealistic concentration of this type of facility in one area, putting pressure on the provision of local services and facilities including schools, shops and medical facilities. 	<p>Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.</p>

Ref	Consultee	Consultee Response Summary	Response/Action
48	Mr James Raven	Considers that the documents that make up the Chelmsford Draft Local Plan are misleading and factually incorrect and states that Great Leighs has not been studied in detail. The respondent raises a number of concerns relating to landscape and traffic impacts associated with development at Great Leighs and the delivery of transportation infrastructure. Considers that Hammond's Farm is an obvious site for a larger development as it is close to the A12, Sandon Park & Ride and a proposed new railway station. Also considers that there are brownfield sites in Chelmsford that could be developed for housing rather than other uses.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
49	Mrs Pauline Price	Raises concern that no consideration has been given to the traffic congestion on the Burnham Road and the A132 and also highlights that traffic surveys were not undertaken at peak times.	Comment noted. The SA has considered the impacts of proposals contained in the Preferred Options Consultation Document on the local road network through the assessment of effects on SA Objective 6 (Transport). It has identified the potential for development associated with specific allocations to affect the A132 but also for this to stimulate investment in highways improvements.
50	Crest Nicholson Operations Ltd	Notes that the SA Report presents a strong case in favour of Growth Area 1, including the greenfield proposal for around 800 homes at Warren Farm. Considers that the assessment of Warren Farm is well summarised at PF26 Appendix G (pages 12 and 31), giving recognition to its sustainable location and potential to maximise the use of non-car modes. Notes that paragraphs 5.47 and 5.48 anticipate 2,588 homes coming forward on brownfield sites in the urban area by 2036 and considers this to be over optimistic given the complex nature of sites 1(a) to 1(g) and that it would not be prudent to rely on this level of delivery. States that a more robust approach would be to assume the completion of around 1,800 homes by 2036. In the event that 1,800 homes were exceeded, this would be regarded as a sustainable windfall.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
51	Mrs Mary Rance	States that the SA Report is based on the SLAA update from 2016 and has not taken into account the original Call for Sites Submission in 2014 nor the additional information submitted to the Council in January 2017 in respect of site CFS81 (Chantry Farm). States that while the appraisal is mainly positive, it emphasises many negative aspects based on wrong assumptions about this proposal. Considers that the Call for Sites submission in 2014 and the additional information submitted in January 2017 for 49 homes of over 55's housing in a landscaped 'parkland' setting will not result in the negative impacts which may have arisen from a larger development. Also states that there will be no negative impact on educational establishments as specialist housing for the elderly is proposed and that the loss of open space will be minimal. Also considers that proposal will have a positive impact on the health and wellbeing of those living and working in the	Comment noted. Developer supplied information will be reviewed in preparing the SA of the Pre-Submission Local Plan and the SA updated where necessary.

Ref	Consultee	Consultee Response Summary	Response/Action
		Chelmsford City Area and will not have adverse impacts on the highway network given the removal of the existing commercial uses, the low number of vehicular movements proposed and close proximity of the site to public transport. Also notes that the reference to Algarve Removals Compound needs to be updated as the company is no longer on the land.	
52	Ms Natalie Hayward, Rochford District Council	No observations made on the SA Report.	Comment noted.
53	Mrs Louise Gannicott	Considers it unrealistic to presume the residents of the proposed new Warren Farm development will cycle and walk to their destinations, so mitigating traffic problems.	<p>Comment noted. The assessment of Warren Farm (site PF26) contained in Appendix G to the SA Report has identified the potential for traffic impacts, notwithstanding the site's edge of urban settlement location. However, taking into account the policy provisions of the Preferred Options Consultation Document in relation to this site (including the provision of on-site facilities and services, cycle links and requirements for improvements to the road network), impacts are expected to be mitigated and a positive effect on transport (SA Objective 6) has therefore been identified.</p> <p>No change.</p>
54	Miss Felicity Gannicott	Considers it unrealistic to presume the residents of the proposed new Warren Farm development will cycle and walk to their destinations, so mitigating traffic problems.	<p>Comment noted. The assessment of Warren Farm (site PF26) contained in Appendix G to the SA Report has identified the potential for traffic impacts, notwithstanding the site's edge of urban settlement location. However, taking into account the policy provisions of the Preferred Options Consultation Document in relation to this site (including the provision of on-site facilities and services, cycle links and requirements for improvements to the road network), impacts are expected to be mitigated and a positive effect on transport (SA Objective 6) has therefore been identified.</p> <p>No change.</p>
55	Mr David Pepper	Considers that a single new town of approximately 23,000 new dwellings would deliver the local authority's housing requirements, minimising the potential for adverse effects elsewhere in the County	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
56	Ms Shyy Sachdev	<p>Notes that the SA discounts sites falling within the Green Wedge for development, yet the identification of the Green Wedge boundaries was not subject to consultation.</p> <p>Proposes that the Local Plan should remove land at Rembrandt House, Broomfield from the Green Wedge and allocate it for residential development. Considers that the allocation of this highly sustainable site</p>	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.

Ref	Consultee	Consultee Response Summary	Response/Action
		<p>accords with the findings of the SLAA, that this site 'performs well against suitability, availability and achievement criteria'</p> <p>Also considers that the Local Plan, as currently drafted, fails to identify sufficient small sites for development.</p>	Further alternative sites within proposed Green Wedges and Green Corridors will be assessed as part of the SA of the Pre-Submission Local Plan.
57	Mrs Emma Costello	Does not consider West Chelmsford (Warren Farm) to be an appropriate or sustainable site for residential and associated development. Notes the findings of the assessment of the site and that the only positive effects identified are in respect of housing and urban renaissance and considers that the negative effects identified outweigh the positive effects.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
58	Miss Paige Harris, Boyer Planning on behalf of The Royal Horticultural Society	Supports Strategic Policy SPA4 – RHS Hyde Hall Gardens Special Policy Area but wishes to see the area covered by the designation expanded.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
59	Jamie Stanley, Icen Projects on behalf of Gateway 120, Cirrus Land LLP, and L & Q Homes	With regard to Moulsham Hall and North Great Leighs (site PF33/34), states that the findings of the SA against the objective 'Sustainable Living and Recreation' (SA Objective 4) gives an inaccurate picture of the site due to the anticipated use of private cars by future residents and the relative lack of local facilities and amenities.	<p>Disagree. It should be noted that the respondent doesn't disagree with the facts identified in the SA, rather they point out that there would still be a high degree of dependence on the private car. However, it should be noted that the minor positive effect identified for the Moulsham Hall and North Great Leighs site on SA Objective 4 relates specifically to what facilities and amenities are within a walkable distance of the site and these have been identified appropriately. SA Objective 6 relates to transport and potential impacts on traffic associated with this site have been assessed as having a negative effect on this SA objective.</p> <p>No change</p>
60	Barton Willmore	States that Land at East of Great Baddow is capable of delivering a comprehensive mixed-use development and that the site can deliver against the SA biodiversity objectives with significant opportunities for biodiversity gain.	Comment noted. Developer supplied information will be reviewed in preparing the SA of the Pre-Submission Local Plan and the SA updated where necessary.
61	North Chelmsford Villages Community Group	States that the findings of the SA of TS1 Drakes Lane are at odds with the Spatial Principles as well as draft policy HO3, which stipulates that proposals for Gypsy, Traveller and Travelling Showpeople sites will only be permitted where (inter alia) adequate community services and facilities are within a reasonable travelling distance and safe and convenient vehicle access can also be provided. Notes that the SA states that the "closest GP is Little Waltham & GT Notley Surgery located 3123m away. Closest City Centre is Chelmsford City Centre 6026m away. Closest Post Office is Abercorn News and Post Office	Comment noted. The status of Gravel Pit Bus Stop and the assessment of site PF48 (Drakes Lane) will be reviewed as part of the SA of the Draft Pre-Submission Local Plan; however, this would not be expected to materially affect the findings of the assessment in respect of this site against SA Objective 4.

Ref	Consultee	Consultee Response Summary	Response/Action
		<p>3631m away. Closest Supermarket is Shell Garage Eagle Way Little Waltham 3172m away. Closest Primary School is Little Waltham CE Primary School 3030m away. Closest Secondary School is Chelmer Valley High School 4109m away. (Closest Public Transport is Gravel Pit Bus Stop 358m away and Closest GP is Little Waltham & GT Notley Surgery 3123m away). Closest Open Space is Cranham Road 403m away". In terms of consistency with national and Development Plan policy on the promotion of sustainable development, considers that the remote and isolated position of TS1 Drakes Lane is completely at odds with the NPPF and Planning Policy for Traveller Sites (NPPTS). Also states that the SA is wrong in that the Gravel Pit Bus Stop no longer exists and that the nearest bus stop and bus route is over 3.5km in Boreham.</p> <p>Notes that the NPPTS states that local authorities should ensure that in collaboration with commissioners of health services, there is access to appropriate health services to ensure that children can attend school on a regular basis, provide a settled base that reduces both the need for long-distance travelling and avoids placing undue pressure on local infrastructure and services. Considers that given the location of this site, at least 40 new persons will not have convenient access to health services whilst the local primary school (which is over-subscribed and reliant on temporary buildings) is some distance away and the secondary school even further. Also notes that many trips would occur along country lanes without pavements crossing a highway strategic route (A130 Essex Regiment Way), from this remote site will be required. States that this is unsustainable and unsafe for children and their families.</p>	
62	David Phillips, Strutt & Parker LLP	No comment.	Noted.
63	Mrs Hannah Thomas-Davies	No comment.	Noted.

4. Schedule of Responses to the Habitats Regulations Assessment Report

Ref	Consultee	Consultee Response Summary	Response/Action
1	Steve Roe, Natural England	Natural England welcomes that a Habitats Regulations Assessment (HRA) has been provided as part of an iterative HRA process. States that the report appears to provide a good overview of the site interest features and current threats and provides detailed record of the main pressures on the relevant European sites, using the Site Improvement Plans and other sources.	Comment noted.
		Is pleased that the HRA includes Dengie (Mid Essex Coast Phase 1) Special Protection Area (SPA) and Ramsar site as part of the screening, in accordance with previous advice.	Comment noted.
		Agrees with the assessment in Section 3.3 of the HRA Report that the Local Plan will have little or no influence over the geomorphological processes and over inappropriate management.	Comment noted.
		<p>Raises a number of concerns with regard to the scope, methodology and some of the conclusions reached in the HRA Report.</p> <p>Concerns raised in relation to the assessment of effects associated with increased visitor pressure on European sites relate to:</p> <ul style="list-style-type: none"> • Zone of influence: advises that location-specific and up to date visitor usage (post-code) survey data should be used to establish an evidence-based zone of influence. • Drive-time modelling: states that the assessment fails to include the Blackwater Estuary SPA and Ramsar site. • In-combination effects: states that the HRA fails to address potential in-combination impacts on European sites from recreational pressure, particularly in the context of other local plans and in consideration of all strategic allocations within Chelmsford. In consequence, Natural England disagrees with the conclusion reached of no Likely Significant Effect. Advises that an appropriate assessment is undertaken for the in-combination effects of the whole plan. Also states that there should be at least an in-combination assessment with regards the Maldon, Braintree and Colchester Local Plans, given that Colchester and Braintree Councils are including the Blackwater Estuary and Crouch and Roach Estuary SPAs and Ramsar sites in the HRAs of their Local Plans. • Mitigation delivery: notes that there is currently no policy commitment, or linked mitigation strategy that will enable identified mitigation measures to be delivered. States that ideally a mitigation strategy would be delivered through collaborative arrangement by local authorities appropriate to the designated sites in consideration. Advises that the best approach is for the Council to 	<p>Comments noted. The concerns raised by Natural England in this response are noted. Following further discussion with Natural England, the issues raised will be considered further as part of the HRA of the Draft Pre-Submission Local Plan.</p> <p>In accordance with the advice and support from Natural England, the Council is currently exploring opportunities for a RAMS with other Essex Councils. .</p>

Ref	Consultee	Consultee Response Summary	Response/Action
		work alongside other Essex councils to implement a cross-authority Recreation and Avoidance Mitigation Strategy (RAMS) that includes all relevant European protected sites.	
		<p>Agrees with the conclusion of the HRA that Strategic Growth Site 8 (SGS8) North of South Woodham Ferrers should be examined further. As it cannot be demonstrated that there is not a likelihood of significant effects on the Essex Estuaries Special Area of Conservation (SAC) and Crouch and Roach Estuary SPA, and, adopting the precautionary principle, Natural England advises that the site should proceed to the appropriate assessment stage.</p> <p>States that the Additional Mitigation Recommendations (p56-57 of the HRA Report) appear to be appropriate amendments for Policy SGS8. States that these might be usefully applied within a RAMS.</p>	Comment noted. An appropriate assessment of the proposed site allocation North of South Woodham Ferrers is to be undertaken as part of the HRA of the Draft Pre-Submission Local Plan.
		With regard to urbanisation effects, considers that the HRA Report underestimates the importance of the grazing marsh and arable farmland to the south and west of South Woodham Ferrers for Brent Geese and states that more detailed consideration is required within the HRA Report to the protective measures that nearby sites may provide to protect European sites against disturbance and other impacts.	Comment noted. The concern raised by Natural England in this response is noted. The issue will be considered further as part of the HRA of the Draft Pre-Submission Local Plan.
		With regard to water quality, states that the HRA should demonstrate that wastewater treatment works and associated infrastructure have sufficient capacity to ensure no adverse effect on water quality.	Comment noted. The concern raised by Natural England in this response is noted. The issue will be considered further as part of the HRA of the Draft Pre-Submission Local Plan.
		With regard to flooding and water level management, states that ensuring that the allocation of SGS8 (North of South Woodham Ferrers) does not reduce the quality or quantity of water in the Crouch and Roach SPA and Ramsar site ditch system is important and needs to be considered carefully.	Comment noted. The concern raised by Natural England in this response is noted. The issue will be considered further as part of the HRA of the Draft Pre-Submission Local Plan.
		Advises that the assessment should include the use of functional habitat by interest feature wintering Golden Plover.	Comment noted. The concern raised by Natural England in this response is noted. The issue will be considered further as part of the HRA of the Draft Pre-Submission Local Plan.
		With regard to air quality, Natural England advises that Epping Forest SAC should be screened in to the HRA process. States that this would allow the Council, as competent authority, to demonstrate how potential air pollution impacts on Epping Forest SAC that may result from likely increased traffic as a result of the Local Plan have been considered in combination with other plans and projects.	Comment noted. The concerns raised by Natural England in this response are noted. Following further discussion with Natural England, the issues raised will be considered further as part of the HRA of the Draft Pre-Submission Local Plan.

Ref	Consultee	Consultee Response Summary	Response/Action
		Also raises concern that the 'assessment of residual uncertainties' for air quality on the Crouch and Roach Estuaries SPA and Ramsar site does not take a sufficiently precautionary approach. Firstly, the assessment only considers SGS8 alone and does not appear to have considered other plans or projects. Secondly when considering the likely significant effect, advises that the HRA re-visits the component habitats of the SPA that are sensitive to air quality (in particular nitrogen oxides, NoX), and their current critical load range(s), in order to determine whether to proceed to appropriate assessment.	
2	Miss Janet Hargreve	Asks where the HRA Screening Report can be viewed and would like to know whether notification will be given where HRA advice isn't followed.	<p>Comment noted. The HRA Report is available to view via the Council's website: http://consult.chelmsford.gov.uk/portal.</p> <p>The Council will consider carefully the recommendations of the HRA. Should any recommendations not be taken forward then this will be recorded and documented in the final HRA Report.</p>
3	David Phillips, Strutt & Parker LLP on behalf of Countryside Properties (UK Ltd)	No comment.	Comment noted.
4	Mrs Hannah Thomas-Davies, Dalton Warner Davis LLP on behalf of Countryside Zest (Beaulieu Park) LLP	No comment.	Comment noted.
5	Mr Stuart Derrick	States that the considerations provided for Strategic Growth Site 8 (North of South Woodham Ferrers) play little regard to infrastructure. States that the main roads out of South Woodham Ferrers are not fit to cope with current capacity, let alone factoring in population growth and that bus and train services are inadequate.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
6	Mrs Sarah Lisamer	Raises concern with regard to the development of Strategic Growth Site 1e (North of Gloucester Avenue (John Shennan) due to the loss of public green space, traffic congestion and road safety.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
7	Miss Ellen Steel	States that Meteor Way (Strategic Growth Site 1c) is a central part of the City today and has been since 1935, providing important recreational space.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.

Ref	Consultee	Consultee Response Summary	Response/Action
8	Mr Mark Chessum	Does not consider Warren Farm to be a sensible nor sustainable development option, particular due to traffic impacts and lack of connectivity. Also asks why the Writtle by-pass has now being discounted and states that there does not seem to be any proposals to improve traffic calming measures along the A414.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.
9	Miss Jennifer Warner	Objects to proposals for Meteor Way due to traffic/highways safety concerns and air quality impacts as well as flood risk.	Comment noted. This response principally relates to the Local Plan as opposed to the SA. The Council's response to the main issues raised in comments to the Preferred Options Consultation Document will be included in a separate document which will accompany the next stage of consultation.

Copyright and non-disclosure notice

The contents and layout of this report are subject to copyright owned by Amec Foster Wheeler (© Amec Foster Wheeler Environment & Infrastructure UK Limited 2016) save to the extent that copyright has been legally assigned by us to another party or is used by Amec Foster Wheeler under licence. To the extent that we own the copyright in this report, it may not be copied or used without our prior written agreement for any purpose other than the purpose indicated in this report. The methodology (if any) contained in this report is provided to you in confidence and must not be disclosed or copied to third parties without the prior written agreement of Amec Foster Wheeler. Disclosure of that information may constitute an actionable breach of confidence or may otherwise prejudice our commercial interests. Any third party who obtains access to this report by any means will, in any event, be subject to the Third Party Disclaimer set out below.

Third party disclaimer

Any disclosure of this report to a third party is subject to this disclaimer. The report was prepared by Amec Foster Wheeler at the instruction of, and for use by, our client named on the front of the report. It does not in any way constitute advice to any third party who is able to access it by any means. Amec Foster Wheeler excludes to the fullest extent lawfully permitted all liability whatsoever for any loss or damage howsoever arising from reliance on the contents of this report. We do not however exclude our liability (if any) for personal injury or death resulting from our negligence, for fraud or any other matter in relation to which we cannot legally exclude liability.

Management systems

This document has been produced by Amec Foster Wheeler Environment & Infrastructure UK Limited in full compliance with the management systems, which have been certified to ISO 9001, ISO 14001 and OHSAS 18001 by LRQA.