

# IIA004

## Chelmsford Local Plan Review: Issues and Options Consultation Document

### Integrated Impact Appraisal Report & Habitats Regulations Assessment – Feedback Report

## 1. Introduction

### 1.1 Chelmsford Local Plan Review: Issues and Options Consultation Document

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

The first stage in the development of the Local Plan Review was the publication of the Chelmsford Local Plan Issues and Options Consultation Document (the 'Issues and Options Consultation Document')<sup>2</sup> that was consulted on between 11 August 2022 and 20 October 2022. The Issues and Options Consultation Document set out, and sought views on, the planning issues that face Chelmsford over the next 15 years and spatial approaches to meeting these challenges in terms of the amount and broad location of future development in the City Area.

An Integrated Impact Appraisal (IIA) Report<sup>3</sup> was prepared to accompany the Issues and Options Consultation document. The consultation responses made to the IIA Report are set out in this report.

### 1.2 The Integrated Impact Appraisal Report

The Council is required to carry out a Sustainability Appraisal (SA) of the Local Plan Review<sup>4</sup>. SA is a means of ensuring that the likely social, economic and environmental effects of the Local Plan Review are identified, described and appraised and also incorporates a process set out under UK regulations<sup>5</sup> called Strategic Environmental Assessment (SEA) which requires that environmental considerations are embedded into the development of plans and programmes such as local plans. IIA brings together SA and SEA, as well as Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA) as part of a unified analysis. The HIA and EqIA are bespoke assessments

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

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

<sup>3</sup> <https://www.chelmsford.gov.uk/media/undd2l1y/chelmsford-local-plan-issues-and-options-iaa.pdf>

<sup>4</sup> The requirement for SA of local plans is set out under section 19(5) of the Planning and Compulsory Purchase Act 2004.

<sup>5</sup> Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633).

designed to specifically address health and equalities matters in order to meet legislative requirements.

The IIA is an iterative process and in this context, WSP Environment & Infrastructure Solutions UK Limited (WSP)<sup>6</sup> has carried out an appraisal of the Issues and Options Consultation Document. The findings of the IIA of the Issues and Options Consultation Document were presented in an IIA Report that was published for consultation alongside the Consultation Document itself.

### 1.3 Habitats Regulations Assessment Report

The Conservation of Habitats and Species Regulations 2010 (as amended) 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). As part of the IIA (Chapter 6), the HRA provides a preliminary conclusion on the likely effects of the Review of the Adopted Local Plan, which has been undertaken based on the spatial approaches contained in the Issues and Options Consultation Document. The HRA (Chapter 6) concludes that: *"none of the objectives or spatial approaches will make adverse effects on any European sites fundamentally unavoidable (i.e. the objectives or spatial approaches will not 'bake in' adverse effects that cannot be avoided or mitigated irrespective of how the objectives and options are defined through allocation and policy)."*

No comments were received on the HRA Report and in consequence, this is not considered further in this document.

### 1.4 This Feedback Report

This report provides a record of the responses provided on the IIA Report. The responses will be taken into account by the Council in preparing the next stage of the Local Plan Review and undertaking the associated IIA.

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## 2. Consultation Review

### 2.1 Responses

A total of 21 respondents provided comments on the Issues and Options Consultation Document IIA Report. **Table 2.1** provides a breakdown of the type and number of respondents.

**Table 2.1 Type and Number of Respondents**

| Type of Respondent                                  | Number of Respondents* |
|---|------------------------|
| Parish/Town Councils or adjoining Local Authorities | 2                      |
| Developers or Representatives                       | 8                      |
| Other Agencies and Authorities                      | 3                      |
| Members of the Public                               | 8                      |

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<sup>6</sup> Formerly Wood Environment & Infrastructure Solutions UK Limited.

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

### Main Issues Raised

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

- Support for the range and content of the IIA Objectives.
- The need for the HIA and EqIA to ensure that the Local Plan Review is developed in a way that enhances the knowledge, skills and wellbeing of existing and new communities.
- An apparent presumption that providing land for business creates additional jobs for the region and that a garden community such as in Spatial Approach E would create jobs that would all be filled by residents of that community.
- The identification of possible negative effects but no policies provided to mitigate these effects.
- Lack of differentiation between spatial approaches.
- The need for clarification of key sustainability issues and the definitions of significance.
- The relationship between housing growth and water resources.
- Disagreement with elements of the scoring of the spatial approaches.
- The need for additional detail on specific sites.
- Support for a particular spatial approach, based on site qualities.

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

**Table 2.2 Consultation Response Summary**

| Ref     | Consultee  | Consultee Response Summary  | Response/Action   |
|---------|--|---|---|
| 1324350 | Mr Rusi Hodivala   | Please mandate that every new detached and semi-detached house must have solar panels installed.  | <p>Comment noted. This comment principally relates to the Local Plan Review as opposed to the IIA.</p> <p>The draft Local Plan Review will set out policies relating to sustainability standards in new developments, including renewable generation opportunities.</p> <p>The IIA Report sets out at Table 1.4 potential or amended policies including the promotion of renewable energy generation and energy efficiency in all new development, as part of wider aspirations for sustainable development across the City Area.</p> |
| 1324045 | Ms Tessa Saunders<br>Spatial Planning<br>Advisor Anglian<br>Water Services Ltd | <p><b>Non-Technical Summary</b></p> <p>The IIA provides a range of assessment objectives which include objectives that aim to protect the natural environment, address impacts on carbon emissions, and conserve and enhance water quality and resources. It is considered that this provides a sound basis for the assessment of Local Plan Review options.</p> <p>The Local Plan Review aims to positively deliver growth in a way that provides greatest opportunities for the health and wellbeing of communities. The IIA includes assessment objectives to improve health and wellbeing, tackle deprivation and promote sustainable living.</p> | <p>Comment noted. Support for the range and content of the Assessment Objectives is welcome.</p> <p>The connections between the IIA and the Local Plan Review in respect of promoting sustainable growth is noted.</p>  |
| 1324045 | Ms Tessa Saunders<br>Spatial Planning<br>Advisor Anglian<br>Water Services Ltd | <p><b>HIA/EqIA/Appendix H - Six Capitals Chelmsford Local Plan Issues and Options - People</b></p> <p>The HIA and EqIA should ensure that the Local Plan Review is developed in a way that enhances the knowledge, skills and wellbeing of existing and new communities.</p>  | <p>Agreed. Issues relating to the enhancement of knowledge, skills and wellbeing of existing and new communities are captured by the IIA Assessment Framework in Objectives 3, 4 and 5.</p> <p>The detailed HIA and EqIA to be undertaken at the next stage of the Local Plan Review will reflect the Six Capitals as part of the analysis.</p>   |

| Ref     | Consultee  | Consultee Response Summary   | Response/Action   |
|---------|--|--|---|
|         |  |  | It is anticipated that the Local Plan Review will include policies that will promote these aspirations, including the provision of educational facilities as part of new development and the advancement of sustainability across the City Area more widely.  |
| 1326389 | Mr Stephen Baddeley Arthurs                          | The Hammonds Farm Development is a proposed new community to the east of the A12; the proposed 4,000 new homes will swamp the existing rural area. The ecology of the area will be completely destroyed. The development is on or adjacent to the flood plain of the River Chelmer and will cause damage to capacity for flood alleviation and the flora and fauna of this sensitive area. | Comment noted. The comments relating to Option E: New Settlement are noted and will be taken into account by the Council. Option E has been assessed in the IIA Report and the assessment has considered the effects of the option in terms of (inter alia) biodiversity and flood risk.  |
| 1326541 | Mr Paul Roberts                                      | There seems a presumption that providing land for business creates additional jobs for the region. Second, there seems a presumption that a garden community such as in Option E would create jobs that would all be filled by residents of that community.  | Comment noted. There is no explicit assumption that the allocation of land for business will create additional jobs or be filled by local residents. Whilst cross-border commuter flows are inevitable (particularly given Chelmsford's location in relation to London), the wider intention is to seek greater self-containment within the City Area in employment provision and opportunities, enhance skill levels, increase income levels and reduce the need to travel.  |
| 636292  | Mrs Tory Melhuish Clerk to Galleywood Parish Council | <b>Non-Technical Summary and Section 5</b><br>The Parish Council is disappointed that the document has identified possible negative effects but there are no policies provided to mitigate these effects (i.e. biodiversity, air quality, water, flood risk, climate change and waste and resource use).   | <p>Comment noted. The purpose of the IIA is to identify the likely significant effects of the Local Plan Review and to recommend measures to mitigate adverse effects and enhance positive effects including in respect of (<i>inter alia</i>) biodiversity, air quality, water, flood risk, climate change and waste and resource use. The IIA does not contain proposed policies itself.</p> <p>It is anticipated that proposed draft planning policies relating to these matters will be developed as part of the next stage of the Local Plan Review, informed by the recommendations of the IIA Report. The proposed policies will be subject to further IIA and consultation.</p> |

| Ref     | Consultee   | Consultee Response Summary  | Response/Action   |
|---------|---|---|---|
| 1326297 | Dr Sue Baker  | No comments.  | N/A   |
| 307959  | Mr and Mrs Andrew Parker  | <b>Spatial Approaches</b><br>Option D (Development along transport corridors) would be equal to Option A (Growing the Existing Strategy), if the villages of Howe Green and Rettendon Common were to be removed from this approach.   | Comment noted.<br><br>The spatial approaches presented are reasonable and distinct alternatives. Section 5.5 presents the comparative analysis of the spatial approaches and identifies differentiators relating to air quality, economic development and sustainable living & revitalisation. The full analysis is presented in Appendix C.<br><br>As part of the development of the most appropriate spatial approach the Council will take into account the analysis of the qualities of individual approaches as well as potential combinations (in whole or in part), including the current spatial strategy. The preferred spatial approach will be subject to IIA. |
| 311148  | Mr Kevin Fraser<br>Principal Planning Officer (Spatial Planning) Essex County Council | Table 3.10 The 10 Year Plan now covers the period 2022 – 2031, and will be used to inform the ‘Future Scenario Assessment’ of the Preferred Option in early 2023. This is referenced with regard to Table 3.10 and Key Sustainability Issues (page 53),   | <b>Table 3.10 The 10 Year Plan</b><br>The revised dates (2022-2031) will be amended in the future iteration of the IIA.   |
| 311148  | Mr Kevin Fraser<br>Principal Planning Officer (Spatial Planning) Essex County Council | Table 3.19 Key Sustainability Issues Identified – Cultural Heritage ... to be consistent with NPPF, paragraph 194 reference should also be made to the contribution made by their setting. It should read: “The need to avoid harm to designated heritage assets and the contribution made by their setting”. This does not appear to have been implemented as suggested. | <b>Table 3.19 Cultural Heritage</b><br>Disagree. Table 3.19 contains the sustainability issue: <i>“The need to protect and where appropriate enhance Chelmsford City Area’s cultural heritage assets and their settings.”</i>   |
| 311148  | Mr Kevin Fraser<br>Principal Planning Officer (Spatial Planning) Essex County Council | Table 3.19 Key Sustainability Issues Identified – Cultural Heritage - in responding to the Scoping consultation ECC welcomed reference to non-designated heritage assets in   | <b>Table 3.19 Cultural Heritage</b><br>Table 3.19 contains the sustainability issue: <i>“The need to recognise the value of non-designated heritage assets</i>  |

| Ref    | Consultee   | Consultee Response Summary  | Response/Action   |
|--------|---|---|---|
|        | Planning) Essex County Council  | Key Sustainability Issue 3. However, ECC recommended it should be amended to state: "The need to recognise the value of non-designated heritage assets and protect where appropriate enhance these where possible. Such sites should be retained in situ, where possible or subject to an appropriate programme of investigation, recording and reporting prior to development commencing". This does not appear to have been implemented as suggested.   | <i>and protect and where appropriate enhance these where possible.</i> The additional text is inappropriate to the context of the table.  |
| 311148 | Mr Kevin Fraser<br>Principal Planning Officer (Spatial Planning) Essex County Council | Table 4.1 The Assessment Framework – Biodiversity and Geodiversity – Guide Question 8 – in responding to the Scoping consultation ECC recommended that reference should be made to biodiversity net gain being required to be provided across the whole of the administrative area, and not just the City urban area. (i.e. remove 'across the city' from the question). This does not appear to have been implemented as suggested   | <b>Table 4.1</b><br>The reference to 'City' under Biodiversity and Geodiversity (Guide Question 8) is intended to refer to the City Area as a whole. This will be amended to reference biodiversity net gain across the whole administrative area of Chelmsford City Council (the City Area) rather than just the City itself. Reference to Biodiversity Net Gain was included as part of Appendix D Definitions of Significance in the updated Scoping Report. |
| 311148 | Mr Kevin Fraser<br>Principal Planning Officer (Spatial Planning) Essex County Council | Table 4.1 The Assessment Framework – Sustainable Living and Revitalisation – Guide Question 8 – in responding to the Scoping consultation ECC recommended reference should be made to 'early years and childcare' for clarity. ECC recommend reference should also be made to access to schools being provided via safe and direct walking and cycling routes. It should read: "Will it increase access to schools via safe and direct walking and cycling routes, early years and childcare and colleges?" This does not appear to have been implemented as suggested. | <b>Table 4.1</b><br>Sustainable Living & Revitalisation (Guide Question 8) will be amended to read " <i>Will it increase access to schools, early years childcare and colleges via safe and direct walking and cycling routes?</i> " This matter was attended to in the updated Scoping Report (Appendix D Definitions of Significance) which includes the suggested criterion. The Definitions of Significance at Appendix E will be updated accordingly.      |
| 311148 | Mr Kevin Fraser<br>Principal Planning Officer (Spatial Planning) Essex County Council | Appendix E Definitions of Significance – Sustainable Living and Revitalisation – Illustrative Guidance <sup>4</sup> – in responding to the Scoping consultation ECC recommended that primary and secondary schools should be separated out from the other key services. A specific criteria should be included for primary and secondary  | <b>Appendix E - Definitions of Significance Sustainable Living &amp; Revitalisation</b><br>The updated Scoping Report (Appendix E Site Appraisal Criteria) includes the following criterion, as suggested by ECC: " <i>Within 800m walking distance of all services (600m for primary schools and 1,500m for secondary schools)</i> "   |



| Ref    | Consultee   | Consultee Response Summary   | Response/Action  |
|--------|---|--|--|
|        |   | education, as recommended in the EDG, whereby any residential area should be no further than 600 metres walking distance from a primary school and 1500 metres for secondary school. This does not appear to have been implemented as suggested.   | <i>and/or the City Centre/South Woodham Ferrers town centre.</i> The Definitions of Significance at Appendix E will be updated accordingly.  |
| 311148 | Mr Kevin Fraser<br>Principal Planning Officer (Spatial Planning) Essex County Council | Appendix E Definitions of Significance – Air – Illustrative Guidance – in responding to the Scoping consultation ECC noted that the Guide Question should make reference to the need to improve air quality, particularly in the Army & Navy and the Maldon Road, Danbury Air Quality Management Areas (AQMA) and this is referenced. However, the illustrative guidance only makes reference to the Army and Navy AQMA. Reference should also be made to Maldon Road, Danbury. This does not appear to have been implemented as suggested   | <b>Appendix E - Definitions of Significance Air</b><br>The Guide Question was amended to include reference to the Maldon Road AQMA. The Illustrative Guidance will be amended to include reference to the Maldon Road AQMA as part of the Preferred Options IIA.   |
| 311148 | Mr Kevin Fraser<br>Principal Planning Officer (Spatial Planning) Essex County Council | Appendix E Definitions of Significance – Waste and Natural Resources – Guide Question 5 – in responding to the Scoping consultation ECC recommended that the ‘Assessment Criteria’ covers not simply MSAs but also Mineral Consultation Areas and Waste Consultation Areas, as required by Policy S8 – Safeguarding mineral resources and mineral reserves (MLP) and Policy S2 – Safeguarding Waste Management Sites and Infrastructure (WLP). ECC suggested it should read: “Development in Minerals Safeguarding Areas; Mineral Consultation Areas and Waste Consultation Areas”. This does not appear to have been implemented as suggested. It is noted that the Strategic Housing and Economic Land Availability Assessment (SHELAA) ‘Suitability Criteria’ makes reference to ‘Site is not within an identified Minerals or Waste Site nor a Minerals or Waste Safeguarding or Consultation Area’, and for consistency this should be referenced within the IIA, Appraisal Criteria. | <b>Appendix E - Definitions of Significance Sustainable Living &amp; Revitalisation</b><br>The updated Scoping Report (Appendix D Definitions of Significance) includes the following criterion, as suggested by ECC: “ <i>Will it result in development within a Minerals Safeguarding Area, Mineral Consultation Area or Waste Consultation Area?</i> ” The Definitions of Significance at Appendix E will be updated accordingly. |



| Ref            | Consultee  | Consultee Response Summary  | Response/Action   |
|----------------|--|---|---|
| <b>1329361</b> | Mr Graham Boddington   | Strong objection to the proposed building of what is effectively a new town of 4,000 houses at the Hammonds Farm site.  | <p>Comment noted. This comment principally relates to the Local Plan Review as opposed to the IIA.</p> <p>Comments relating to Option E: New Settlement are noted and will be taken into account by the Council when preparing the Preferred Options Consultation Document.</p>   |
| <b>1329368</b> | Mr Mark Baister<br>Historic Environment Consultant<br>Place Services Historic Environment Team | Additional paragraph required detailing the role of the Essex Historic Environment Record (HER).  | Agreed. The Essex HER will be referenced in future iterations of the IIA.   |
| <b>1155857</b> | Mr Pat Abbott<br>Planning Advisor<br>Environment Agency  | <p>Water Abstraction – recommends that proposed development considers water resources as a key issue and the council recognises the damage of long term increases in abstraction due to growth.</p> <p>Water Quality<br/>Assessment and mitigation of risks associated with wastewater is required.</p> <p>Ecology<br/>Support for the proposed Biodiversity Net Gain (BNG) policy commitment</p> <p>Flood Risk<br/>Recommend re-drafting para on p.41 which recognises the damage of long-term increases in abstraction due to growth.</p> <p>Note: this comment refers to the I&amp;O Consultation Document and not the IIA</p> | <p>Water Abstraction<br/>The IIA Report recognises the potential environmental effects associated with increased abstraction related to population and economic growth in both the baseline analysis presented in Section 3, the HRA in Section 6 and in the assessment of IIA Objective 8 Water: To conserve and enhance water quality and resources.</p> <p>Housing growth and non-household industrial growth estimates are embedded in local government plans across the Water Resources East region, according to the Draft Regional Plan. Feedback on the emerging plan has requested evidence around the certainty and deliverability of the demand management measures proposed, particularly behavioural changes, and in relation to housing growth options. This evidence will assist the preparation of local plans to support resource-efficient new developments.</p> <p>Water Quality<br/>The IIA Scoping Report sets out guide questions (Appendix D) and site appraisal criteria (Appendix E) which identify how policies and proposals are to be</p> |

| Ref     | Consultee                             | Consultee Response Summary  | Response/Action  |
|---------|---------------------------------------|---|--|
|         |                                       |   | <p>scrutinised against the topics of: Biodiversity (Objective 1), Water Resources (Objective 8) and Waste &amp; Natural Resources (Objective 12)</p> <p>Ecology<br/>Support for the proposed BNG policy commitment is noted.</p> <p>Flood Risk<br/>Redrafting comment noted. In future iterations of the IIA, text relating to the damage of long-term increases in abstraction due to growth will be amended in accordance with changes to text in the Local Plan Review. Proposed wording <i>“Ensure development adapts to minimise adverse impacts that create climate and ecological change, including avoiding areas of flood risk (now or in the future) wherever possible, managing surface water run-off and reducing carbon emissions.”</i></p> |
| 1270312 | Joel Merris<br>Vistry Group           | <p>Appendix B Protecting Green Belt land B48, App D Key Settlement Characteristics, para 3.2.4 and para 3.8.11</p> <p>Considers that the lack of a Partial Green Belt Review to consider site boundaries on the edges of Chelmsford will result in sites that are less sustainable outside of the Green Belt.</p> | <p>Comment noted.</p> <p>A partial Green Belt Review has not been completed as part of the Local Plan Review, reflecting the spatial principle of Protecting the Green Belt. The IIA considers spatial approaches which have been prepared as part of taking into account the agreed Green Belt spatial principle.</p>   |
| 1249937 | Consultations Team<br>Natural England | Table 4.1 support in relation to Biodiversity Net Gain (BNG) and Suitable Alternative Natural Greenspace (SANG) advice.   | Comment noted.   |
| 1330236 | Mr David Bolton<br>Bolton, S&D        | Supports the IIA in identifying and meeting the housing needs of the Chelmsford City Area and deliver decent homes as an assessment objective (Objective 2), and also to reduce the need to travel, promote more sustainable  | The IIA tests the performance of the spatial approaches at a necessarily high level, using recognised indicators and associated assessment questions. Conclusions  |

| Ref     | Consultee           | Consultee Response Summary   | Response/Action   |
|---------|---------------------|--|---|
|         |                     | <p>modes of transport and align investment in infrastructure with growth as an objective (Objective 6). "This will ensure the spatial principles, priorities and strategy will be assessed against this context helping to inform the most appropriate and sustainable plan."</p> <p>Identified significant negative sustainability effects relating to Objective 7 (land use), along with a series of mixed, minor negative and uncertain effects relating to several the assessment objectives.</p> <p>Until specific locations and site allocations are identified within the Local Plan, with proposed quantum, densities, and scales it is perhaps premature to assess the Housing Requirement as having negatively or mixed effects until this level of detail is better understood.</p> | <p>appropriate to this stage of plan preparation, of which the IIA is only one part, will be consequently drawn.</p> <p>The Issues and Options Consultation Document does not contain site allocations. It is anticipated that the Preferred Options Consultation Document will include proposed site allocations and these (alongside reasonable alternatives) will be assessed as part of the IIA process in due course. The employment land requirement and broad distribution of growth has been assessed as part of the IIA process. Following selection of a preferred strategy, site options will be assessed as part of the next IIA Report. This approach is appropriate and commensurate with the development of the Local Plan Review.</p> |
| 1329438 | Chris Buckenham     | Disagrees with elements of scoring: argue that building on greenfield land isn't inherently negative. Disagree with negative scoring against objectives 1, 6, 8, 9, 11, 13 and 14 for Spatial Approach C. Scoring system for sustainable accessibility could be more reflective of individual settlements.   | Disagree. Greenfield land is a finite resource and the likely loss of land of a scale indicated by the quantum of housing growth to be provided over the plan period is considered to be significant. Nevertheless, this is balanced against the beneficial effects identified in respect of housing and service provision, meeting local and sub-regional housing needs, particularly in the provision of affordable housing.  |
| 1330351 | Pigeon (Sandon) Ltd | 3.4, 4.2, 5.4, Table 5.5, 5.8 Support but detail on sites required.  | <p>Comment noted. Support for the key sustainability issues regarding the economy is welcomed.</p> <p>Based on the Employment Land Requirement, and as the Local Plan Review develops, future iterations of the IIA will consider site-specific qualities in greater detail.</p>  |
| 1329432 | The Bucknell Family | Support for the IIA recognising the need to deliver a range of employment sites to support economic growth, and to ensure a flexible supply of land for employment development as key sustainability issues Support for the  | <p>Support noted.</p> <p>The Issues and Options Consultation Document does not contain site allocations. It is anticipated that the Preferred</p>   |

| Ref     | Consultee                               | Consultee Response Summary  | Response/Action   |
|---------|---|---|---|
|         |   | <p>recognition of the need to reduce out-commuting by creating a stronger employment market within the Chelmsford area and the value of alternative modes of transport such as park and ride sites as key transport and accessibility sustainability issues.</p> <p>Section 5.4 - question scoring in the absence of detail.<br/> <i>"No details have been provided within the I&amp;O document on proposed locations of employment growth, distribution or site allocations and therefore one queries how the IIA can undertake a robust assessment of the Employment Land Requirement against the Assessment Objectives."</i></p> | <p>Options Consultation Document will include proposed site allocations and these (alongside reasonable alternatives) will be assessed as part of the IIA process in due course. The employment land requirement and broad distribution of growth has been assessed as part of the IIA process. Following selection of a preferred strategy, site options will be assessed as part of the next IIA Report. This approach is appropriate and commensurate with the development of the Local Plan Review.</p> <p>As the Local Plan Review develops, future iterations of the IIA will how consider employment needs can be met through site allocations, as well as further guidance on employment and spatial strategy, including the location of any employment land.</p> |
| 1330405 | Cliffords Group and Mr Mark Peters      | Question whether the housing requirement would result in a significant negative sustainability effect on Objective 7 (Land Use) as a result of the use of greenfield land.  | <p>Comment noted. Greenfield land is a finite resource and the likely loss of land of a scale indicated by the quantum of housing growth to be provided over the plan period is considered to be significant. Nevertheless, this is balanced against the beneficial effects identified in respect of housing and service provision, meeting local and sub-regional housing needs, particularly in the provision of affordable housing.</p> <p>No change is proposed.</p>  |
| 1326424 | Obsidian Strategic Asset Management Ltd | Scoring of elements of Approaches A – E questioned as generalisations, which do not accord with locally-specific contexts.  | <p>Disagree.<br/> The Methodology was consulted upon and has been updated in response to the comments received. The updated methodology has been applied in the assessment of the options. It is considered that the assessments have taken into account the local socio-economic and environmental baseline.</p> <p>The scoring applied to the options in the IIA Report reflects a balance between a wide range of issues, and</p>  |

| Ref     | Consultee            | Consultee Response Summary  | Response/Action   |
|---------|----------------------|---|---|
|         |                      |   | <p>the consequent professional judgement as to the overall performance of the option in respect of specific IIA Objectives, in this case: Objective 3: Economy, skills and employment and for Objective 6: Transport.</p> <p>The resultant scores take into account: the need to balance various factors is cited in the analysis of Appendix G, which identifies the role of Chelmsford as a sub-regional economic centre, the proximity of and transport links to London, the role of existing and potential housing growth, and the cross-boundary flows associated with employment centres and workers. These factors are set against the desire and need to pursue a more sustainable development path which includes, <i>inter alia</i>, seeking to reduce commuting distances, enhancing the quality of employment opportunities, modal shift in transport use and greater economic and service self-containment as a community.</p> <p>No change is proposed.</p> |
| 1329447 | Mr Alexander Micklem | Response expresses support for the IIA but states that “as detailed within this Representation, no details have been provided within the I&O document on proposed locations of employment growth, distribution or site allocations and therefore one queries how the IIA can undertake a robust assessment of the Employment Land Requirement against the Assessment Objectives.” | <p>Comment noted. This comment principally relates to the Local Plan Review as opposed to the IIA.</p> <p>The Issues and Options Consultation Document does not contain site allocations. It is anticipated that the Preferred Options Consultation Document will include proposed site allocations and these (alongside reasonable alternatives) will be assessed as part of the IIA process in due course. The employment land requirement and broad distribution of growth has been assessed as part of the IIA process. Following selection of a preferred strategy, site options will be assessed as part of the next IIA Report. This approach is appropriate and commensurate with the development of the Local Plan Review.</p>   |

| Ref    | Consultee                                      | Consultee Response Summary  | Response/Action  |
|--------|--|---|--|
| 872955 | Grosvenor Property UK and Hammonds Estates LLP | Hammonds Farm masterplan qualities in respect of Biodiversity & Geodiversity considerations. Suggested enhanced score for Spatial Approach E.         | <p>The detail submitted in respect of the qualities of land to the south and east of the A12 (i.e. Spatial Approach E) and the suggested enhanced score is noted but disagreed with for the reasons set out in Appendix G.</p> <p>Should land at Hammonds Farm be considered by the Council to be a reasonable alternative for site allocation, the site will be assessed as part of IIA of the forthcoming Preferred Options Consultation Document.</p> |
| 872955 | Grosvenor Property UK and Hammonds Estates LLP | Hammonds Farm masterplan qualities in respect of Housing considerations. Suggested enhanced score for Spatial Approach E.                             | <p>The detail submitted in respect of the qualities of land to the south and east of the A12 (i.e. Spatial Approach E) and the suggested enhanced score is noted but disagreed with for the reasons set out in Appendix G.</p> <p>Should land at Hammonds Farm be considered to be a reasonable option for site allocation, this will be assessed against the IIA framework, along with other potential sites.</p>                                       |
| 872955 | Grosvenor Property UK and Hammonds Estates LLP | Hammonds Farm masterplan qualities in respect of Economy, Skills & Employment considerations. Suggested enhanced score for Spatial Approach E.        | <p>The detail submitted in respect of the qualities of land to the south and east of the A12 (i.e. Spatial Approach E) and the suggested enhanced score is noted but disagreed with for the reasons set out in Appendix G.</p> <p>Should land at Hammonds Farm be considered to be a reasonable option for site allocation, this will be assessed against the IIA framework, along with other potential sites.</p>                                       |
| 872955 | Grosvenor Property UK and Hammonds Estates LLP | Hammonds Farm masterplan qualities in respect of Sustainable Living & Revitalisation considerations. Suggested enhanced score for Spatial Approach E. | <p>The detail submitted in respect of the qualities of land to the south and east of the A12 (i.e. Spatial Approach E) and the suggested enhanced score is noted but disagreed with for the reasons set out in Appendix G.</p> <p>Should land at Hammonds Farm be considered to be a reasonable option for site allocation, this will be assessed against the IIA framework, along with other potential sites.</p>                                       |

| Ref    | Consultee                                      | Consultee Response Summary  | Response/Action  |
|--------|--|---|--|
| 872955 | Grosvenor Property UK and Hammonds Estates LLP | Hammonds Farm masterplan qualities in respect of Health & Well-Being considerations. Suggested enhanced score for Spatial Approach E. | <p>The detail submitted in respect of the qualities of land to the south and east of the A12 (i.e. Spatial Approach E) and the suggested enhanced score is noted but disagreed with for the reasons set out in Appendix G.</p> <p>Should land at Hammonds Farm be considered to be a reasonable option for site allocation, this will be assessed against the IIA framework, along with other potential sites.</p>           |
| 872955 | Grosvenor Property UK and Hammonds Estates LLP | Hammonds Farm masterplan qualities in respect of Transport considerations. Suggested enhanced score for Spatial Approach E.           | <p>The detail submitted in respect of the qualities of land to the south and east of the A12 (i.e. Spatial Approach E) is noted. and the suggested enhanced score is noted but disagreed with for the reasons set out in Appendix G.</p> <p>Should land at Hammonds Farm be considered to be a reasonable option for site allocation, this will be assessed against the IIA framework, along with other potential sites.</p> |
| 872955 | Grosvenor Property UK and Hammonds Estates LLP | Hammonds Farm masterplan qualities in respect of Land Use & Soils considerations.   | <p>The detail submitted in respect of the qualities of land to the south and east of the A12 (i.e. Spatial Approach E) is noted.</p> <p>Should land at Hammonds Farm be considered to be a reasonable option for site allocation, this will be assessed against the IIA framework, along with other potential sites.</p>   |
| 872955 | Grosvenor Property UK and Hammonds Estates LLP | Hammonds Farm masterplan qualities in respect of Water considerations. Suggested enhanced score for Spatial Approach E.               | <p>The detail submitted in respect of the qualities of land to the south and east of the A12 (i.e. Spatial Approach E) and the suggested enhanced score is noted but disagreed with for the reasons set out in Appendix G.</p> <p>Should land at Hammonds Farm be considered to be a reasonable option for site allocation, this will be assessed against the IIA framework, along with other potential sites.</p>           |



| Ref    | Consultee                                      | Consultee Response Summary  | Response/Action  |
|--------|--|---|--|
| 872955 | Grosvenor Property UK and Hammonds Estates LLP | Hammonds Farm masterplan qualities in respect of Flood Risk considerations.   | <p>The detail submitted in respect of the qualities of land to the south and east of the A12 (i.e. Spatial Approach E) is noted.</p> <p>Should land at Hammonds Farm be considered to be a reasonable option for site allocation, this will be assessed against the IIA framework, along with other potential sites.</p>   |
| 872955 | Grosvenor Property UK and Hammonds Estates LLP | Hammonds Farm masterplan qualities in respect of Air considerations. Suggested enhanced score for Spatial Approach E.                       | <p>The detail submitted in respect of the qualities of land to the south and east of the A12 (i.e. Spatial Approach E) and the suggested enhanced score is noted but disagreed with for the reasons set out in Appendix G.</p> <p>Should land at Hammonds Farm be considered to be a reasonable option for site allocation, this will be assessed against the IIA framework, along with other potential sites.</p> |
| 872955 | Grosvenor Property UK and Hammonds Estates LLP | Hammonds Farm masterplan qualities in respect of Waste & Natural Resources considerations. Suggested enhanced score for Spatial Approach E. | <p>The detail submitted in respect of the qualities of land to the south and east of the A12 (i.e. Spatial Approach E) and the suggested enhanced score is noted but disagreed with for the reasons set out in Appendix G.</p> <p>Should land at Hammonds Farm be considered to be a reasonable option for site allocation, this will be assessed against the IIA framework, along with other potential sites.</p> |
| 872955 | Grosvenor Property UK and Hammonds Estates LLP | Hammonds Farm masterplan qualities in respect of Cultural Heritage considerations. Suggested enhanced score for Spatial Approach E.         | <p>The detail submitted in respect of the qualities of land to the south and east of the A12 (i.e. Spatial Approach E) and the suggested enhanced score is noted but disagreed with for the reasons set out in Appendix G.</p> <p>Should land at Hammonds Farm be considered to be a reasonable option for site allocation, this will be assessed against the IIA framework, along with other potential sites.</p> |

| Ref    | Consultee                                      | Consultee Response Summary  | Response/Action  |
|--------|--|---|--|
| 872955 | Grosvenor Property UK and Hammonds Estates LLP | Hammonds Farm masterplan qualities in respect of Landscape & Townscape considerations. Suggested enhanced score for Spatial Approach E. | <p>The detail submitted in respect of the qualities of land to the south and east of the A12 (i.e. Spatial Approach E) and the suggested enhanced score is noted but disagreed with for the reasons set out in Appendix G.</p> <p>Should land at Hammonds Farm be considered to be a reasonable option for site allocation, this will be assessed against the IIA framework, along with other potential sites.</p> |

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**Issued by**

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Robert Deanwood

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**Approved by**

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**Document revisions**

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