

# Chelmsford Local Plan Review: Preferred Options Consultation Document Integrated Impact Appraisal Report – Feedback Report

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## 1. Introduction

### 1.1 Chelmsford Local Plan Review: Preferred 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 (Chelmsford Local Plan 2013-2036)<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<sup>th</sup> August 2022 and 20<sup>th</sup> 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.

Subsequently, the feedback received as part of the Issues and Options Consultation was used to prepare the Preferred Options Consultation Document, which was accompanied by an Integrated Impact Assessment which included a Habitats Regulations Assessment<sup>4</sup>. Consultation on the documents took place between 8<sup>th</sup> May 2024 and 19<sup>th</sup> June 2024.

The consultation responses made to the Preferred Options IIA Report, which included a HRA Assessment, 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>5</sup>. IIA 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

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<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/undd211y/chelmsford-local-plan-issues-and-options-ia.pdf>

<sup>4</sup> [Consultation Home - Keystone \(chelmsford.gov.uk\)](https://www.chelmsford.gov.uk/consultation-home-keystone)

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

regulations<sup>6</sup> called Strategic Environmental Assessment (SEA). The SEA 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) within a single document. The HIA and EqIA are bespoke assessments designed to specifically address health and equalities matters in order to meet legislative requirements.

### 1.3 Habitats Regulations Assessment Report

The Conservation of Habitats and Species Regulations 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, the HRA (**Appendix L**) provides a preliminary conclusion on the likely effects of the Review of the Adopted Local Plan, based on the spatial approaches contained in the Preferred Options Consultation Document. The HRA concludes that:

*In summary, none of the Preferred Options allocations will have significant effects alone due to their small size, the habitats affected, the absence of impact pathways, and their distance from the nearest European sites, with the possible exception of the following:*

- *One allocation within 500m of a European site (Land North of South Woodham Ferrers).*
- *Allocations that may affect 'functionally linked land' (FLL) associated with some sites.*
- *The vast majority of the planning policies contained in the Preferred Options Consultation Document are categorised as 'no effect' or 'no significant effect' policies. However, the following policies are explored further through appropriate assessment: S6 Housing and Employment Requirements; S7 The Spatial Strategy; and site allocation policies.*

### 1.4 This Feedback Report

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

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## 2. Consultation Review

### 2.1 Responses

A total of 49 respondents provided comments on the Preferred Options Consultation Document IIA Report. **Table 2.1** provides a breakdown of the type and number of respondents.

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<sup>6</sup> Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633).

**Table 2.1 Type and Number of Respondents**

Type of Respondent	Number of Respondents*
Parish/Town Councils or adjoining Local Authorities	3
Developers or Representatives	35
Other Agencies and Authorities	4
Members of the Public	7

## 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 and associated HRA Assessment are:

- Support for the IIA and its analysis.
- Objections to specific proposed strategic site allocations in respect of key sustainability criteria.
- Lack of justification for the proposed allocations, particularly in respect of the use of evidence.
- Specific site-related constraints which invalidate the choice of a specific site.
- Questioning the scoring by the IIA for specific indicators and how mitigation measures will be applied.
- The presence of alternative spatial options which are deemed more sustainable, consequently invalidating the choice of preferred allocations.
- Lack of a comprehensive Green Belt review undermining the IIA because a full range of alternative strategic options have not been presented.
- Lack of consideration of the availability and capacity of community infrastructure.
- Uncertainties recorded by the IIA undermining the overall analysis and conclusions on site sustainability.
- Failure to present and appraise a sufficient range of reasonable alternatives and/or specific alternative sites and site options not considered.
- The need to ensure that appropriate green infrastructure standards are applied as part of site development.
- The need for HRA-related matters to be fully reflected in plan policies.
- The need to include an Executive Summary in the HRA.
- No specific comments were made on either the HIA or the EqIA.

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

**Table 2.2 Consultation Response Summary**

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
POIIA1	Patricia Stewart	Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm)	<p>Concerned that the proposal to develop Hammonds Farm involves significant loss of an extremely rural area which has no infrastructure suitable for an estate of homes.</p> <p>A substantial new road will cross the designated Chelmer and Blackwater conservation area.</p> <p>The traffic implications both for the A12 and for local roads are significant with no properly developed proposals for effective mitigation.</p> <p>Loss of quality agricultural land which should be preserved and used for farming.</p> <p>Suggests that the necessary land can be allocated at North East Chelmsford and on brownfield sites without need to breach the current eastern limit of Chelmsford's development.</p>	<p>Objection to the Preferred Option at Hammonds Farm is noted.</p> <p>The IIA Report assessed the option across a range of criteria, including loss of greenfield land and potential traffic implications.</p> <p>The logic of the relationship between the options presented in the Issues and Options Document and that presented in the Preferred Options Consultation Document is explained in the latter document, reflecting the availability of additional evidence base work and the consideration of the mix of spatial options which can meet housing and employment requirements.</p> <p>No change to the IIA.</p>
POIIA2	Mandy Hessing	Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm)	<p>Concerned that flood risk issues at the Hammonds Farm site will be exacerbated by climate change and the proposed development, with no evidence that these matters were taken into account before selecting the preferred option.</p> <p>Concerned that increased traffic will cause congestion in surrounding areas and that local infrastructure will be strained.</p>	<p>Objection to the Preferred Option at Hammonds Farm is noted.</p> <p>Matters associated with potential flood risk and traffic congestion are noted in the IIA, based on technical evidence available at the time of assessment and to be subject to further detailed scrutiny. Flood risk and traffic issues are identified in the IIA as matters of concern. Flood Risk is recorded as a Significant Negative/Uncertain reflecting proximity to a water course and presence of Flood Zones 2 and 3. However, the policy requires the use of flood mitigation measures which should help to minimise flood risk. No significant effects are therefore anticipated.</p> <p>Transport is recorded as a Significant Positive/Minor Negative, reflecting traffic generation but the requirement of the site-specific policy is for measures to enable travel by sustainable modes (including walking and cycling) and improvements to the local road network (supported by a traffic management strategy).</p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
				<p>The Council's assessment of the proposed allocation states: <i>"The site will accommodate a new Garden Community for housing and employment development, a country park, areas for SUDS, biodiversity and recreation, and provide active and sustainable modes of transport to key destinations. Complies well with Strategic Priorities, Vision, Spatial Principles and Spatial Strategy in particular by providing a mixed and balanced new self-contained community. Supported by the Plan evidence base e.g. Heritage Assessment 2024. There are no overriding constraints that would hinder the delivery of the site which will significantly contribute to housing and employment supply. It is viable and available with no overriding physical constraints to bringing forward the allocation in this location."</i></p> <p>No change to the IIA.</p>
POIIA3	Keith Ferguson	Section 5.5	<p>Registers a strong opposition to the proposed allocation at Hammonds Farm on the basis that viable alternatives have not been properly analysed.</p> <p>Suggests that past approaches presented envisaged delivery on large sites at Beaulieu and elsewhere along with brownfield sites and that there has been no justification for the need to look beyond these sites.</p>	<p>The objection to the proposed allocation at Hammonds Farm is noted. Throughout the plan preparation process, the identified housing need and the various site options which could meet that need have been clearly presented and subject to appraisal through the IIA.</p> <p>The greenfield land requirement has increased in line with the recalculation of the housing requirement and the combination of sites which can meet this requirement. Alternative sites of a similar capacity were not identified.</p> <p>No change to the IIA.</p>
POIIA4	Alan Brunning	South Woodham Ferrers	<p>Suggests that the traffic modelling associated with proposed developments at South Woodham Ferrers has not been sufficiently updated and new traffic surveys are required.</p>	<p>This is a detailed highways related matter to be dealt with through the Local Plan evidence base.</p> <p>No change to the IIA.</p>
POIIA5	Andrew Stewart	Growth Site Policy 11c Land West of Barbrook Way	<p>Notes a property as being in a flood risk area (Bicknacre Brook) with concerns that there are no plans to upgrade a local pumping station.</p> <p>Concerned that additional development will exacerbate surface flooding and drainage issues.</p>	<p>This is a matter for detailed consideration in respect of site-level Flood Risk Assessment.</p> <p>No change to the IIA.</p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
POIIA7	Pigeon (Sandon) Ltd	Section 5.4 Table 5.3 Paragraph 5.4.5 Paragraph 5.4.6 Section 5.5 Paragraph 5.5.4 Paragraph 5.5.17	<p>Disagrees with the IIA Scoring of land adjacent to the A12 Junction 18 against a range of criteria. Suggests that negative impacts can be mitigated through the implementation of Development Management policies and as such should be recorded as being positive.</p> <p>By contrast the positive effects recorded against various indicators are supported.</p>	<p>Support for the overall conclusions of the IIA on Land adjacent to A12, Junction 18 is noted.</p> <p>The assessments are made in respect of specific aspects of the site option (biodiversity, transport, air quality, climate change and waste and natural resources and new infrastructure requirements) in light of available evidence, and the requirements of Development Management Policies which will implement mitigation in response to the detailed plans submitted by site proposers.</p> <p>The role of the IIA is to present an assessment of likely effects and where opportunities exist for their mitigation in light of proposed policies, and consequently enhancement of their overall sustainability performance and in respect of individual measures.</p> <p>Comments on alternative scoring are welcome and will be reviewed as part of the preparation of the Pre-Submission IIA.</p>
POIIA8	Vistry Group	Green Belt	Suggests that a Green Belt Review is required to ensure that sites within the Green Belt can be included which would provide sustainable development. The IIA is deficient in not considering these reasonable alternatives.	<p>Comment noted.</p> <p>A 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 spatial principle of not amending Green Belt boundaries as part of the Local Plan Review.</p> <p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected.</p> <p>In this context, the IIA has considered reasonable options (i.e. those which have been developed in light of available evidence, spatial planning requirements and plan strategy).</p> <p>No change to the IIA.</p>
POIIA9	Wates Developme	Strategic Growth Site	Suggests that the Preferred Spatial Strategy is well evidenced in the IIA and that the findings in	The broad support for the current iteration of the IIA is noted.

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
	nts and Hammond s Estates LLP	Policy 16a – East Chelmsford Garden Community (Hammonds Farm)	<p>relation to the proposed East Chelmsford Garden Community are supported and that the proposed Spatial Strategy represents sustainable development and is preferable to the alternatives considered.</p> <p>Scores relating to biodiversity, flood risk, heritage and landscape are disputed, claiming that masterplanning and site preparation mitigate the negative effects identified.</p>	Comments on alternative scoring are welcome and will be reviewed as part of the preparation of the Pre-Submission IIA.
<b>POIIA10</b>	The Cathedral School	Sites 1a, 1d, 1x, 1y, 1z	The provision of services and community infrastructure has not been adequately considered in the context of the proposed development within central Chelmsford.	<p>The provision and capacity of appropriate infrastructure such as educational establishments is a matter for the local education authority in conjunction with the Council to ensure that adequate provision is made as part of new development. Such matters are part of the evidence base, site policies and development management policies.</p> <p>No change to the IIA.</p>
<b>POIIA12</b>	The Danbury Society	Section 4.4	Notes that various uncertainties associated with the preparation of the IIA exist and consequently it is difficult to understand how, with so many uncertainties and unknowns that a decision to include a previously unsustainable site as a primary and preferred location for future development has been arrived at. From the IIA it is clear that potential mitigation and enhancement measures are at present unknown.	<p>The uncertainties raised are standard topics to be addressed through site design and the application of strategic, site and development management policies, applied to a specific proposal for development. These help to mitigate the likely effects of the development, providing for a more sustainable outcome.</p> <p>No change to the IIA.</p>
<b>POIIA13</b>	The Danbury Society	Section 5.5	In considering the objectives the IIA report found that the key likely significant sustainability effects associated with the spatial approaches includes Objective 9 Flood risk; To reduce the risk of flooding to people property taking into account the effects of Climate Change.	<p>Comment noted. The likely effects of climate change are incorporated into strategic and site policies, including suitable headroom and mitigation measures based on current best practice in site and building design, drawing on sources such as the Essex Design Guide.</p> <p>No change to the IIA.</p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
POIIA14	The Danbury Society	Para. 5.5.61	Suggests that reasons for opposing the East Chelmsford Garden Community are being ignored by CCC.	<p>Para 5.5.61 cites consultation responses as part of an open approach. These matters were responded to as part of the Issues and Options consultation report. Subsequently, further technical work has addressed these matters in whole or part.</p> <p>No change to the IIA.</p>
POIIA15	Historic England	Appendix G	Uncertainties have been identified in respect of heritage-related considerations of new sites and it is unclear what evidence has been used. Further detail should be included in subsequent iterations of the IIA.	<p>Heritage Impact Assessments (HIA) are a requirement of detailed site development pertaining to potential archaeological material. Recognised sources have been used to inform the IIA at a high level, for example proximity to protected sites. HIAs for all new sites proposed within the Preferred Options Consultation Document have been undertaken and published alongside the Preferred Options consultation</p> <p>No change to the IIA.</p>
POIIA16	Richborough	Para 5.6.19; Section 10	<p>Objects to the allocation of the East Chelmsford Garden Community on the basis that significant strategic highway works are required to gain access to the site which is consequently a risk to both the timely delivery of the site and the viability of the site. It is further suggested that there is no evidence to suggest that the required level of infrastructure, services and amenities could feasibly or viably accommodate such a large increase in the number of houses and residents.</p> <p>Considers that in light of range of constraints associated with the East Chelmsford Garden Community site, including flood risk and accessibility, a wider range of locations and site sizes should be considered to meet the requirement, particularly within Growth Area 3.</p>	<p>Objection to the allocation of the proposed East Chelmsford Garden Community is noted. Matters of accessibility are the subject of technical studies, both from the Council and site promoters, which have helped to inform the selection and appraisal of options.</p> <p>Throughout the Local Plan Review process, options have been considered on an equal basis to enable comparative performance to be gauged. Uncertainties are acknowledged, including the understanding that further detailed technical work is likely to be required on matters such as flood risk. Statutory bodies (Natural England, the Environment Agency and Historic England) are invited to comment both on the options and on detailed planning applications.</p> <p>No change to the IIA.</p>
POIIA17	Hopkins Homes Ltd		The document does not consider the implications for development viability and deliverability of draft policies S2, DM25 and DM31	Viability and deliverability are not IIA considerations, being covered by the Local Plan Review.



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				No change to the IIA.
POIIA18	Saxtons 4x4	Section 5	Suggests that alternative options to the proposed employment allocations have not been tested.	<p>The Preferred Options Consultation Document proposes a continuation of the existing approach to employment land provision, i.e. a flexible rolling employment land supply across the plan period to 2041 using a combination of existing and new sites to achieve this.</p> <p>Appendix G lists alternative sites which were rejected, whilst the Issues and Options Consultation identified alternative spatial approaches which included employment options. Table 5.11 summarises the reasons for the rejection of alternative sites and site clusters.</p> <p>No change to the IIA.</p>
POIIA19	Saxtons 4x4	Para. 1.4.9	Suggests that additional suitable and available employment sites could increase the employment allocation, better aligning with the spatial strategy. Suggests that the IIA does not seem to test alternative options to the employment allocations, or any “extend existing employment areas” options for assessment. Confirmation is sought that this has been undertaken.	<p>Appendix G lists alternative sites which were rejected, whilst the Issues and Options Consultation identified alternative spatial approaches which included employment options. Table 5.11 summarises the reasons for the rejection of alternative sites and site clusters.</p> <p>No change to the IIA.</p>
POIIA20	Welbeck Strategic Land V Limited	Appendix G	Concern that site options presented for land at Barbroom Way have not been considered by the IIA regarding the location of new residential development, or confirmation regarding the full extent of land to be promoted for consideration. Suggests that there are errors in the assessment of the site against key sustainability objectives which has directly impacted upon the overall scoring for the scheme.	<p>Site options, including scales of development, were considered against SHELAA and IIA criteria. The preferred site allocation is part of the proposed strategy of the Local Plan which identifies Key Service Settlements such as Bicknacre for proportionate growth, meeting the requirement to identify land to accommodate 10% of the housing requirement on sites no larger than 1 hectare.</p> <p>Comments on alternative scoring are noted and will be reviewed as part of the preparation of the Pre-Submission IIA.</p>
POIIA21	Taylor Wimpey	Section 5 West Chelmsford 21SHELAA41	Suggests that the basis for rejecting either of sites at West Chelmsford on the basis of performing less well in sustainability terms than the Warren Farm allocation due to poorer access and	Appendix G states that: <i>“This is adjacent to the allocated site (Location 2) and Area for Future Recreational Use and/or SuDS. When compared to the preferred site, this would result in more isolated development in the Rural Area and have the potential to have greater landscape impacts. Overall, this site is considered to</i>

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			connectivity into Chelmsford's Urban Area is fundamentally flawed because the proposals are additional, and not as an alternative, to the existing allocation	<i>perform less well than the allocated site against the Spatial Strategy and Spatial Principles."</i> No change to the IIA.
POIIA22	Broomfield Parish Council	Para. 5.6.9	Requests that additional text is presented in the IIA relating to further expansion at Broomfield relating to landscape capacity and sensitivity; the danger of coalescence between settlements; and concerns about primary school capacity.	The evidence cited will be taken into account in the next iteration of the IIA and the suggested text considered for inclusion in light of confirmation of the status of infrastructure enhancements.
POIIA23	Daniel James Developments	Section 5 and Appendix 6	Notes that land north and south of Peverels Farm has not been assessed as a reasonable alternative and these sites, due to its smaller scale than the wider East Chelmsford Garden Community (CGC) is more than likely to come forward within the Plan period, contributing positively to local housing supply trajectory as part of the CGC.	An assessment of the proposed site on land to the north and south of Peverels Farm (SHELAA Reference 21SHELAA60) will be presented in the IIA which accompanies the Pre-Submission Local Plan.
POIIA24 and POIIA25	Richard Speakman	Para 5.6.24, Table 5.11	Suggests that draft Policy S7 has limited to no positive effect on transport and accessibility objective and considers there to be an opportunity to create a policy that will contribute to and deliver smaller and more easily deliverable sites that have sustainable accessibility to local services, thus increasing support of existing community facilities and promoting the use of public transport and cycling. Suggests that a site should be included, notwithstanding the content of the Sandon Neighbourhood Plan.	Comments on Policy S7 are noted. Potential allocations at Sandon were explored and discounted for the reasons set out in light of the consideration of technical evidence including the matter of the separation and retention of the physical identity of settlements. No change to the IIA.
POIIA26	Dandara	Appendix G	Disagree with the reasoning of the IIA that a wider site allocation of land at Ford End should be discounted, reflecting the direction of the NPPF at paragraph 70 a) which requires Local Planning	All potential allocations have been assessed on an equal basis. Site options, including scales of development, were considered against SHELAA and IIA criteria. The preferred sites (split across two allocations) are part of the proposed strategy of the Local Plan which identifies service settlements such as Ford End

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
			Authorities to accommodate 10% of their housing requirements on sites no larger than 1 hectare.	for proportionate growth, meeting the requirement to identify land to accommodate 10% of the housing requirement on sites no larger than 1 hectare.  No change to the IIA.
POIIA27	David Simmonds	Objectives 13 and 14	Suggests that reference should be made to J A Baker, noting his international cultural importance in respect of the proposed East Chelmsford Garden Community.	Request for reference to J A Baker and his association with the Chelmer Valley is noted. Comments to this effect have not been received from Historic England or Natural England.  No change to the IIA.
POIIA28	Vishal Sharma	Appendix G	Suggests that Policy S7 should be amended to help deliver smaller and more easily deliverable sites across the City area.	Comments on Policy S7 are noted.  No change to the IIA.
POIIA29	Whirledge & Nott	Approach C – Exploring a wider strategy	Suggests that a Green Belt Review is required to ensure that sites within the Green Belt can be included which would provide sustainable development. The IIA is deficient in not considering these reasonable alternatives.	Advocacy for a Green Belt Review is noted.  Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected.  No change to the IIA.
POIIA30	Whirledge & Nott	Approach C - Exploring a wider strategy	Suggests that a Green Belt Review is required to ensure that sites within the Green Belt can be included which would provide sustainable development. The IIA is deficient in not considering these reasonable alternatives.	Advocacy for a Green Belt Review is noted.  Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected.  No change to the IIA.
POIIA31	Whirledge & Nott	Approach C – Exploring a wider strategy	Suggests that a Green Belt Review is required to ensure that sites within the Green Belt can be included which would provide sustainable	The IIA will appraise the Local Plan Review from Issues & Options Stage through to Submission. The Local Plan Review contains reasonable alternatives as spatial, site and policy options.

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
			development. The IIA is deficient in not considering these reasonable alternatives.	Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council’s administrative area in a sustainable way. It would also undermine the protection of the Green Belt by national planning policy. This approach has therefore been rejected by the Council.  No change to the IIA.
<b>POIIA32</b>	Whirledge & Nott	Approach C – Exploring a wider strategy	Suggests that a Green Belt Review is required to ensure that sites within the Green Belt can be included which would provide sustainable development. The IIA is deficient in not considering these reasonable alternatives.	The IIA will appraise the Local Plan Review from Issues & Options Stage through to Submission. The Local Plan Review contains reasonable alternatives as spatial, site and policy options.  Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council’s administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected.  No change to the IIA.
<b>POIIA33</b>	Natural England	Para. 1.7.2	Suggests that there should be clearer reference to policy protection for protected sites, including monitoring of policy implementation. Suggests that the IIA should include indicators relating to the provision of natural greenspace, recommending the use of ANGSt and Green Infrastructure Standards; consider the Essex LNRS and the green infrastructure network; impacts on soils and include measures to avoid/minimise impacts, particularly in areas of best and most versatile agricultural land.	The IIA works in conjunction with the Local Plan to deliver sustainable development, including through the application of site and Development Management policies which contain measures to ensure that proposed development applies appropriate infrastructure standards. The IIA objectives and indicators have been subject to two previous rounds of consultation with statutory consultees.  In subsequent iterations of the IIA, clearer reference will be made to policy protection for protected sites, including monitoring of policy implementation.  Further refinement of policy recommendations will be made in respect of mitigation measures which should inform the application of policy as part of site development, including the use of Access to Natural Greenspace Standards and Green Infrastructure standards where appropriate. The impact on soils has been considered through the Land Use IIA Objective and significant negative scores provided where greenfield land is proposed for development, recognising the loss of this resource.

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
POIIA37	Crest Nicholson	Section 5	Disagrees with the discounting of the further expansion of West Chelmsford as part of the proposed spatial strategy.	<p>The IIA has assessed those sites which are considered to be reasonable options, including the identification of reasonable alternatives.</p> <p>The Preferred Options Consultation Document presents a range of sites at various spatial scales which are considered to be capable of best meeting the identified development requirements.</p> <p>No change to the IIA.</p>
POIIA38	Essex County Council	Para. 6.1.9	Support for the conclusions of the IIA which notes that alternative approaches to the proposed Spatial Strategy are considered to perform less well than the preferred Spatial Strategy when considered against national planning policy, an analysis of the Issues and Options consultation responses, the Issues and Options IIA Report, the Local Plan Vision and Spatial Principles, Settlement Hierarchy, environmental constraints, the availability and viability of land for development and discussions with key stakeholders.	<p>Support noted.</p> <p>No change to the IIA.</p>
POIIA39	Croudace Homes	Approach C – Exploring a wider strategy	Suggests that a Green Belt Review is required to ensure that sites within the Green Belt can be included which would provide sustainable development. The IIA is deficient in not considering these reasonable alternatives.	<p>The IIA will appraise the Local Plan Review from Issues &amp; Options Stage through to Submission. The Local Plan Review contains reasonable alternatives as spatial, site and policy options.</p> <p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected.</p> <p>No change to the IIA.</p>
POIIA40	Croudace Homes	Approach C – Exploring a wider area	Suggests that a Green Belt Review is required to ensure that sites within the Green Belt can be included which would provide sustainable	The IIA will appraise the Local Plan Review from Issues & Options Stage through to Submission. The Local Plan Review contains reasonable alternatives as spatial, site and policy options.

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
			development. The IIA is deficient in not considering these reasonable alternatives.	<p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected</p> <p>No change to the IIA.</p>
<b>POIIA41</b>	Croudace Homes	Approach C – Exploring a wider strategy	Suggests that a Green Belt Review is required to ensure that sites within the Green Belt can be included which would provide sustainable development. The IIA is deficient in not considering these reasonable alternatives.	<p>The IIA will appraise the Local Plan Review from Issues &amp; Options Stage through to Submission. The Local Plan Review contains reasonable alternatives as spatial, site and policy options.</p> <p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected</p> <p>No change to the IIA.</p>
<b>POIIA42</b>	Croudace Homes	Approach C – Exploring a wider strategy	Suggests that a Green Belt Review is required to ensure that sites within the Green Belt can be included which would provide sustainable development. The IIA is deficient in not considering these reasonable alternatives.	<p>The IIA will appraise the Local Plan Review from Issues &amp; Options Stage through to Submission. The Local Plan Review contains reasonable alternatives as spatial, site and policy options.</p> <p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected.</p> <p>No change to the IIA.</p>
<b>POIIA43</b>	Higgins Group	Green Belt	Suggests that a Green Belt Review is required to ensure that sites within the Green Belt can be included which would provide sustainable development. The IIA is deficient in not considering these reasonable alternatives.	<p>The IIA will appraise the Local Plan Review from Issues &amp; Options Stage through to Submission. This includes reasonable alternatives in the form of spatial, site and policy options.</p> <p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release</p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
				<p>Green Belt land and the approach has therefore been rejected.</p> <p>No change to the IIA.</p>
<b>POIIA44</b>	Dandara Eastern	Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm)	Disagrees with the proposed allocation of land at East Chelmsford on the basis of unproven sustainable travel options and the existence of more sustainable sites such as at South Woodham Ferrers which can deliver development in a more timely fashion. Notes that in previous iterations of the IIA, the new settlement option scored worst in both in terms of the integrated impact assessment and in light of highways evidence.	<p>The objection to the proposed allocation at East Chelmsford is noted.</p> <p>The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The discounting of options at an early stage based on available evidence is a Council-led process.</p> <p>The Preferred Options Local Plan presents a range of sites at various spatial scales which are considered to be capable of best meeting the identified development requirements.</p> <p>The challenges presented in respect of the evidence base are noted, particularly in respect of physical separation and opportunities for modal shift. The development is intended to be planned as a garden community with a degree of self-containment and measures to promote modal shift are integral to this. It is the role of strategic, site and development management policies to secure these measures as part of site development.</p> <p>Questioning of housing delivering rates, particularly in comparison to potentially competing sites, is noted. This is a matter for detailed phasing and delivery agreements between the Council and the site developer/promoter.</p> <p>Challenges to and defence of the credibility of the evidence base which supports a development is part of the Local Plan Examination in Public.</p> <p>No change to the IIA.</p>
<b>POIIA45</b>	Tritton Farming Partnership LLP	Appendix G	Suggests that proposed development at Chatham Green should be considered as a reasonable alternative and, moreover, complementary to the proposed East Chelmsford Garden Community at Hammonds Farm.	<p>The IIA will appraise the Local Plan Review from Issues &amp; Options Stage through to Submission. This includes reasonable alternatives in the form of spatial, site and policy options.</p> <p>The Preferred Option Consultation Document presents a range of sites at various spatial scales which are considered to be capable of meeting the identified development requirements.</p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
				<p>Alternative spatial strategies were considered at the Issues and Options stage of the Local Plan Review, including growth along transport corridors such as that at Chatham Green. The approach has not been taken forward as part of the spatial strategy. Specifically, land at Chatham Green was rejected due to its relative isolation from existing services and facilities which would lead to higher reliance on the use of the private car, landscape capacity and sensitivity concerns and capacity limits at the wastewater recycling facilities serving the area.</p> <p>An assessment of the proposed site on land at Chatham Green will be presented in the IIA which accompanies the Pre-Submission Local Plan.</p>
<b>POIIA46</b>	Obsidian Strategic Asset Management Ltd	Approach A, Approach C & Assessment Objective 6	Disagrees with the reasoning presented to support the rejection of Broomfield as a location of for growth on the basis of employment transport considerations.	<p>The IIA has assessed those sites which are considered to be reasonable options, including the identification of reasonable alternatives. Sites which are not considered as part of this process have failed to meet the selection criteria applied.</p> <p>It is agreed that a correction to the Approach A score and narrative (Appendix K, page 760) is required and will be attended to as part of the next iteration of the IIA.</p>
<b>POIIA47</b>	Hill Residential Ltd	para 5.5.19, table 5.7, para 5.5.82-5.5.85, Appendix D, Page 405, Appendix K	Suggests that a Green Belt Review is required to ensure that sites within the Green Belt can be included which would provide sustainable development. The IIA is deficient in not considering these reasonable alternatives.	<p>The IIA will appraise the Local Plan Review from Issues &amp; Options Stage through to Submission. The Local Plan Review contains reasonable alternatives for spatial, site and policy options.</p> <p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected.</p> <p>No change to the IIA.</p>
<b>POIIA48</b>	Cliffords Group Ltd	Appendix F	Notes that land south of Wheelers Hill, Little Wlatham should be included as a reasonable alternative.	<p>Changes to the Green Wedge boundaries have been discounted as sufficient and suitable land is available outside the Green Wedge to meet the area's development needs in a sustainable way. This approach has therefore been discounted.</p> <p>No change to the IIA.</p>



Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
POIIA49	Cliffords Group Ltd	Appendix F	Notes that land east of Back Lane, Little Waltham should be included as a reasonable alternative.	<p>Changes to the Green Wedge boundaries have been discounted as sufficient and suitable land is available outside the Green Wedge to meet the area's development needs in a sustainable way. This approach has therefore been discounted.</p> <p>No change to the IIA.</p>
POIIA50	Cliffords Group Ltd	Appendix F	Notes that land at Essex Regiment Way should be included as a reasonable alternative.	<p>An assessment of the proposed site at Essex Regiment Way (SHELAA Reference: CFS94) will be presented in the IIA which accompanies the Pre-Submission Local Plan.</p>
POIIA51	Cliffords Group Ltd	Appendix F	Considers that a site at Back Lane, Little Waltham has not been assessed as a reasonable alternative.	<p>Changes to the Green Wedge boundaries have been discounted as sufficient and suitable land is available outside the Green Wedge to meet the area's development needs in a sustainable way. This approach has therefore been discounted.</p> <p>No change to the IIA.</p>
POIIA52	Cliffords Group Ltd	Appendix F	Notes that land at Campion Farm should be included as a reasonable alternative.	<p>Changes to the Green Wedge boundaries have been discounted as sufficient and suitable land is available outside the Green Wedge to meet the area's development needs in a sustainable way. This approach has therefore been discounted.</p> <p>No change to the IIA.</p>
POIIA53	Gladman Developments Ltd	Reasonable Alternatives	Suggests that a Green Belt Review is required to ensure that sites within the Green Belt can be included which would provide sustainable development. The IIA is deficient in not considering these reasonable alternatives.	<p>The IIA will appraise the Local Plan Review from Issues &amp; Options Stage through to Submission. The Local Plan Review contains reasonable alternatives as spatial, site and policy options.</p> <p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected.</p> <p>The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many</p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
				<p>combinations. The Preferred Options Consultation Document presents a range of sites at various spatial scales which are considered to be capable of meeting the identified development requirements.</p> <p>No change to the IIA.</p>
<b>POIIA54</b>	Cliffords	Section 5 and Appendix 6	Notes that land at Campion Farm should be included as a reasonable alternative.	An assessment of the proposed site at Campion Farm (SHELAA Reference: CFS211) will be presented in the IIA which accompanies the Pre-Submission Local Plan.
<b>POIIA55</b>	A.G. & P.W.H Speakman	Section 5 and Appendix 6	Questions the robustness of the IIA on the basis that Land at Anchor Field has not been assessed as a reasonable alternative site.	<p>The IIA has assessed those sites which are considered to be reasonable options, including the identification of reasonable alternatives. Sites which are not considered as part of this process have failed to meet the selection criteria applied.</p> <p>No change to the IIA.</p>
<b>POIIA56</b>	Van Diemans Property Company	Land at Silver Ash, Cranham Road, Little Waltham	Notes that land at Silver Ash has not been assessed as a reasonable alternative.	An assessment of the proposed site on land at Silver Ash, Little Waltham (SHELAA Reference: 21SHELAA83) will be presented in the IIA which accompanies the Pre-Submission Local Plan.
<b>POIIA57</b>	Miscoe Enterprises Ltd	Section 5 and Appendix 6	Notes that land to the rear of Broomfield Library has not been assessed as a reasonable alternative.	<p>Changes to the Green Wedge boundaries have been discounted as sufficient and suitable land is available outside the Green Wedge to meet the area's development needs in a sustainable way. This approach has therefore been discounted.</p> <p>No change to the IIA.</p>
<b>POIIA58</b>	The Bucknell Family	Appendix F	Notes that land at Regiment Park, Little Waltham should be included as a reasonable alternative.	<p>The IIA has assessed those sites which are considered to be reasonable options, including the identification of reasonable alternatives. Sites which are not considered as part of this process have failed to meet the selection criteria applied.</p> <p>No change to the IIA.</p>

Reference	Consultee	Relevant paragraph/ table/figure/ appendix	Consultee Response Summary	Response/Action
POIIA59	CJH Farming Ltd	Section 5	Considers that a number of the scores in the IIA (biodiversity, transport, air quality, climate change and waste and natural resources) relating to the proposed development at Little Boyton Hall Farm are incorrect and that negative impacts will be mitigated through the application of Development Management policies.	The assessments are made in respect of specific aspects of the site option (biodiversity, transport, air quality, climate change and waste and natural resources and new infrastructure requirements) in light of available evidence, and the requirements of Development Management Policies, which will implement mitigation in response to the detailed plans submitted by site proposers.
POIIA60	Basildon Council	Whole document	Notes that there will be no significant negative cumulative effects arising from the interaction between the Preferred Options Consultation Document and surrounding local authorities policies, including the emerging Basildon Local Plan.	<p>Accordance of the analysis of the IIA with the emerging Basildon Plan is acknowledged.</p> <p>No change to the IIA.</p>
POIIA61	Environment Agency	Appendix B; Section 3	Recommendations for policy changes in respect of: Flood Risk, Ecology, Water Resources and Quality, Sustainable Drainage Systems, Land Contamination and Waste Management	<p>The text relates to the Preferred Options Consultation Document and does not reference the IIA.</p> <p>No change to the IIA.</p>
POIIA62	This Land	Section 5 Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm)	Suggests that the site is not in a sustainable location and delivery of the level of development proposed is questionable, therefore it is considered that there is insufficient evidence to demonstrate that the site is suitable for an allocation of this magnitude and therefore should not be included as a site allocation within the forthcoming Local Plan. Growth should be directed towards highly sustainable locations already well served by existing and planned for infrastructure.	<p>Objection to Hammonds Farm is noted.</p> <p>The IIA has assessed those sites which are considered to be reasonable options, including the identification of reasonable alternatives. The Preferred Options Local Plan presents a range of sites at various spatial scales which are considered to be capable of best meeting the identified development requirements.</p> <p>No change to the IIA.</p>
POIIA63	Chignal Parish Council	Table 5.11, and Appendix G	Welcomes the proposal not to extend the West Chelmsford allocated site and the recognition that the existing housing allocation area needs extensive landscaping, especially on the northern and western edges and that it should not be	<p>Support noted for West Chelmsford not to be extended as part of the Local Plan Review.</p> <p>No change to the IIA.</p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
			extended because of the landscape impact and further loss of Grade 2 agricultural land.	
POIIA64	Chignal Parish Council	Appendix F	Sets out concerns that the proposed development at Little Boyton Hall Farm has significant negative landscape and visual effects which cannot be mitigated.	<p>The Landscape and Sensitivity Study 2024 notes that: <i>“The overall visual sensitivity is judged to be moderate, reflecting the location, high quality screening, remoteness of BCLP1, and the small presence recreational visual receptors on its periphery. Development could effectively be mitigated without altering the intrinsic character of the landscape in this location.”</i></p> <p>The IIA scoring for this site (Appendix G p.496) acknowledges negative effects including loss of greenfield land (significant negative) and landscape (minor negative), noting that Policy 15 contains mitigation measures to be applied which include building design and landscaping.</p> <p>A degree of visual sensitivity is clearly present, which will potentially include views from residential properties and communal areas.</p> <p>No change to the IIA.</p>
POIIA66	Hawridge Strategic Land	Strategic Policy S7	Notes support for the proposed spatial strategy and the reasoning that there is a need to allocate significant new development on greenfield sites to meet future housing needs in full whilst still pursuing a brownfield first approach.	Support for the Local Plan Review and IIA is noted.
POIIA67	Essex County Fire & Rescue Service	Local Plan	Requests the implementation through policy of a series of measures in the design and construction of new developments, including: adherence to the requirements of the Fire Safety Order and Building Regulations.	<p>Such detailed matters will be considered as part of the refinement of site and development management policies.</p> <p>No change to the IIA.</p>
POIIA68	Martin Grant Homes	Green Belt	Concerned that the proposed strategy does not consider the role of the Green Belt in providing sustainable sites, particularly on land which adjoins the urban area.	<p>The IIA will appraise the Local Plan Review from Issues &amp; Options Stage through to Submission. The Local Plan Review contains reasonable alternatives as spatial, site and policy options, based on the current Local Plan.</p> <p>Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council’s administrative area in a sustainable way.</p>

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
				<p>The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected.</p> <p>No change to the IIA.</p>
POIIA69	Hallam Land Management		<p>Considers that the IIA demonstrates the positive overall sustainability and justification of strategic growth at North East Chelmsford Garden Community promoted by the Consultation.</p>	<p>Comments noted.</p> <p>No change to the IIA.</p>
POIIA70	Dandara Eastern	Policy S7 Spatial Strategy	<p>Considers that there are serious risks associated with the deliverability of standalone settlements, particularly one that is anticipated to commence delivery so quickly in the Plan period, and in a local authority area where one Garden Community is already allocated to deliver a large proportion of the City's growth requirement. A more flexible and deliverable approach is required.</p> <p>Considers that the Council has not used clear and conclusive reasoning for taking the preferred approach or presented a source of evidence relating to further expansion at West Chelmsford or Broomfield.</p>	<p>The questioning of housing delivery rates, particularly in comparison to potentially competing sites, is noted. This is a matter for detailed phasing and delivery agreements between the Council and the site developer/promoter.</p> <p>The Preferred Options Consultation Document presents a range of sites at various spatial scales which are considered to be capable of best meeting the identified development requirements.</p> <p>Challenges to, and defence of, the credibility of the evidence base which supports a development is part of the Local Plan Examination in Public.</p> <p>No change to the IIA.</p>

## HRA-Related Representations made by Natural England

Note: representations PO24-9648, PO24-9692, PO24-9714, PO24-9721 were made on the Preferred Options Document but concern the HRA.

Reference	Consultee	Relevant paragraph/table/figure/appendix	Consultee Response Summary	Response/Action
POIIA34	Natural England	HRA	<p>One of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.</p> <p>The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification.</p>	Noted. The HRA addresses air quality issues for designated sites within the scope, which includes those within 200m of main roads with increased traffic where there is a realistic possibility of Annual Average Daily Traffic (AADT) increasing by >1000 in combination. We will keep this aspect under review and update the baseline data prior to issue of the final report.
POIIA35	Natural England	HRA	The Non-Technical Summary (NTS) appears to be missing from the report.	An NTS is not included at this point but will be included as part of the Pre-Submission HRA.
POIIA35	Natural England	HRA	With regard to recreational pressure/urbanisation for all of the screened in sites, the report concludes that incorporated policy measures will provide sufficient safeguards to ensure that recreational pressure does not adversely affect Crouch Estuary sites. Whilst the Essex Coast RAMS is set up to account for the 'in combination' effects of new housing within a Zone of Influence; payment of the tariff does not automatically account for impacts from new development when considered individually. Additional mitigation measures, such as the provision of sufficient accessible on-site green infrastructure and circular walks, may also be required. Larger developments, particularly those close to the protected areas, will be required to adhere to the Natural England Suitable Alternative Natural Greenspace (SANG) guidelines in terms of the level of greenspace provision. Early discussion with Natural England is recommended to agree the required level of mitigation.	<p>Noted. Policy recommendations will be made accordingly, to be considered as part of preparing the Pre-Submission Local Plan.</p> <p>No change to the HRA.</p>

<b>POIIA35</b>	Natural England	HRA	Please refer to our Designated Sites View for further information on sensitivity to pressures and seasonality which can help inform mitigation. For example, the dark bellied brent goose is sensitive to visual disturbance, above-water noise and litter, all of which may be increased by increased visitor pressure.	Noted
<b>POIIA35</b>	Natural England	HRA	Agree with the additional wording that has been proposed to be added to Strategic Policy S4 to ensure that developers will need to demonstrate that sufficient waste water treatment capacity is available ahead of the occupation of new development to ensure no deterioration in the quality of receiving waters.	Noted
<b>PO24-9648</b>	Natural England	Strategic Policy S4 (HRA related)	The policy states that 'Contributions from qualifying residential developments within the Zones of Influence, as defined in the adopted Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS), will be secured towards mitigation measures identified in the RAMS'. Please note that additional mitigation, such as the provision of accessible on-site greenspace, may also be required, depending on the size and location of the proposed development. Note also that greenspace provided as mitigation for impacts on designated coastal sites does not count towards biodiversity net gain but can contribute to no net loss.	Noted. Policy recommendations will be made accordingly, to be considered as part of preparing the Pre-Submission Local Plan.  No change to the HRA.
<b>PO24-9692</b>	Natural England	Strategic Policy S9 (HRA related)	Natural England believes that this wording is potentially misleading as all residential developments which meet the criteria in the Essex Coast RAMS SPD are required to pay the tariff (i.e. it is not an either/or situation) and, in addition to paying the tariff, larger developments will need to provide suitable alternative and accessible natural greenspace, circular walks and other features; this approach should be 'business as usual' rather than 'exceptional circumstances'.  We strongly advise rewording the policy and the supporting text to clarify the situation and ensure it is compliant with Policy DM16.	Noted. Policy recommendations will be made accordingly, to be considered as part of preparing the Pre-Submission Local Plan.  No change to the HRA.
<b>PO24-9714</b>	Natural England	Strategic Growth Site Policy 10 – North of South Woodham Ferrers (HRA related)	Uncertain how the South East (Inshore) Marine Plan has been taken into account at Strategic Growth Site Policy 10 – North of South Woodham Ferrers if at all. The policy states that there is a requirement to 'Undertake a project-level Habitats Regulations Assessment to address the impacts other than recreational disturbance'. We agree that a HRA needs to be undertaken but it must consider all impacts taken alone or in combination, including recreational disturbance. In addition, a Marine Conservation Zone (MCZ) assessment may also need to be undertaken.	Noted. Policy recommendations will be made accordingly, to be considered as part of preparing the Pre-Submission Local Plan.  No change to the HRA.

<b>PO24-9721</b>	Natural England	Policy DM16 (HRA related)	It may be necessary to outline avoidance and/or mitigation measures at the plan level, which will usually need to be considered as part of an Appropriate Assessment, including a clear direction for project level HRA work to ensure no adverse effect on the integrity of internationally designated sites. It may also be necessary for plans to provide policies for strategic or cross boundary approaches, particularly in areas where designated sites cover more than one Local Planning Authority boundary. Natural England would welcome discussion on the HRA of the plan and can offer further advice as policy options are progressed.	Noted. Policy recommendations will be made accordingly, to be considered as part of preparing the Pre-Submission Local Plan.  No change to the HRA.
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