

# **SOCG019**

Chelmsford Local Plan  
Statement of Common Ground  
with Anglian Water  
March 2026

## **Statement of Common Ground Chelmsford City Council and Anglian Water**

### **1. Introduction**

Chelmsford City Council (CCC) is reviewing the Chelmsford Local Plan adopted in 2020. This has reached submission stage (Regulation 22) following consultations on the:

- Pre-Submission (Regulation 19) Local Plan (Pre-Submission Plan for short) in Spring 2025 and
- Focused Consultation (Regulation 19) Additional Sites Document (Additional Sites Document for short) in late 2025-early 2026.

This Statement of Common Ground (SOCG) has been prepared to assist the examination of the Local Plan which comprises the Pre-Submission Plan combined with the site allocations and consequential changes and in the Additional Sites Document.

It establishes areas of agreement and areas of disagreement between Anglian Water (AW) and CCC in relation to AW's representations on the Pre-Submission Plan and the Additional Sites Document.

This SOCG also sets out agreed proposed modifications to the Pre-Submission Plan and the Additional Sites Document following email exchanges between CCC and AW after the close of the consultations.

For the avoidance of doubt none of the proposed modifications are considered necessary to address soundness issues and instead provide factual updates, clarifications and helpful detail to the Local Plan.

The consultation responses alongside collected evidence and national planning policy and guidance have been used to develop the Local Plan.

A map of CCC's administrative area in context with its neighbouring districts and county councils is attached at Appendix A.

CCC has fully engaged with AW on the development of the Council's review of the adopted Local Plan from the outset. In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, AW has been formally consulted at each Regulation 18 and 19 stages of consultation together with their accompanying Integrated Impact Assessment (IIA).

## 2. Areas of Common Ground

Proposed new text is shown in underline.

| <b>Consultation Document</b> | <b>Rep Number</b> | <b>Local Plan Reference</b> | <b>Summary of representation</b>   | <b>Agreed resolution and any proposed modifications</b>  |
|------------------------------|-------------------|-----------------------------|--|--|
| Pre-Submission Plan          | PSQ25-6396        | Strategic Policy S7         | Agree that the spatial strategy which focusses growth within, and surrounding Chelmsford presents the most sustainable option for growth, with two garden communities.   | Noted. <b>No modification required to the Plan.</b>  |
| Pre-Submission Plan          | PSQ25-6396        | Strategic Policy S7         | Chelmsford Water Recycling Centre (WRC) has sufficient Dry Weather Flow (DWF) headroom to accommodate the planned growth in and around the city.   | Noted. <b>No modification required to the Plan.</b>  |
| Pre-Submission Plan          | PSQ25-6396        | Strategic Policy S7         | The Water Cycle Study (WCS) Stage 2 has identified that the current DWF will be exceeded at the SWF WRC based on the proposed growth and that the current headroom is very limited. Before an application can be made to the Environment Agency (EA) to increase the DWF permit, significant modelling will be required. The AW PR24 Business Plan identifies a scheme at SWF WRC for AMP8 to enable growth to come forward. | Noted. <b>No modification required to the Plan.</b> See also comments to Strategic Growth Site Policies 1dd 17c, 17d and 20 and Growth Site Policies 17e, 21a and 21b below. |

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| Pre-Submission Plan       | PSQ25-6396 | Strategic Policy S7  | <p>There are some errors in the WCS relating to Great Leighs WRC at para 6.7.1 and Table 6.7. The proposed allocations in Great Leighs catchment will require a DWF permit increase to be accommodated. Agree that development must not be delivered until there is sufficient capacity available at the WRC and this may require a suitable phasing plan to align with our future investment plans</p>   | <p>Noted. CCC's consultants have confirmed that there are errors in the WCS (CC017) in relation to Great Leighs at para 6.7.1 Table 6.7 providing an incorrect DWF permit. However, the correct figure is used in Section 6.7.1.1 (Table 6.8) and the correct figure has been used in the calculation spreadsheets. The error does not change any of the consultant's conclusions. <b>No modification required to the Plan</b></p> |
| Additional Sites Document | AS-1151    | Strategic Policy S7  | <p>We recognise that significant uplifts in both property and population in the short term will be constrained by water recycling capacity in some locations as our current Drainage and Wastewater Management Plan published in 2023 (DWMP) will not have accounted for this additional growth. This will be factored into the preparation of our next DWMP due to be published in 2028.</p> <p>This may lead to delay to house delivery in some locations due to infrastructure constraints and the time to fund and deliver capital investment for large scale growth.</p> | <p>Noted. <b>No modification required to the Plan.</b> Refer to comments made below to Strategic Growth Site Policies 17c, 17d and 20 and Growth Site Policies 17e, 21a and 21b</p>  |

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|                       |            |                      | This need to be factored into the Local Plan with phased delivery where necessary and reflected in housing delivery trajectories.   |   |
| Pre-Submission Plan   | PSQ25-6397 | Strategic Policy S9  | Support the policy and references to utilities infrastructure, flood risk management and green infrastructure which align with our strategic priorities and future investments in the Council's administrative area. This clearly aligns to our strategic priorities and future investments in the Chelmsford City Council administrative area. | Noted. <b>No modification required to the Plan.</b> |
| Pre-Submission Plan   | PSQ25-6398 | Strategic Policy S10 | Support requirements for developments to demonstrate sufficient capacity for wastewater treatment and disposal. Applicants have the right to connect to the public network regardless of capacity constraints, so we rely on the planning system to ensure proposed development is managed effectively.   | Noted. <b>No modification required to the Plan.</b> |
| Pre-Submission Plan   | PSQ25-6393 | DM7                  | Support the policy which clarifies that utility infrastructure including water recycling and treatment sites is appropriate within the Green Wedge  | Noted. <b>No modification required to the Plan.</b> |

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| Pre-Submission Plan   | PSQ25-6395 | DM25  | Support the policy approach to set a water efficiency standard of 90 l/p/d. Would welcome cross reference to Policy DM18, to require strategic growth areas to incorporate integrated water management measures at a community scale (rainwater/stormwater harvesting and reuse) that to facilitate water reuse in homes for flushing toilets and garden irrigation. This would enable developments to be more water efficient and go beyond a fittings-only based approach to further minimise potable water use. | <b>Agreed. Modify paragraph 9.23 by adding a cross reference to DM18:</b> A rainwater collection and re-use system can contribute towards a reduction in non-potable (non-drinkable) water consumption, and is required for all new residential development due to wider considerations of water scarcity and to ensure the sustainable use of water. Recovered water can be used for tasks such as flushing toilets, washing laundry and watering gardens and plants. Site layouts will need to make the necessary space available to accommodate rainwater collection/reuse systems. <u>Developers should also refer to Policy DM18 in relation to integrated water management techniques.</u> Further guidance will be set out in the updated Making Places SPD. |
| Pre-Submission Plan   | PSQ25-6399 | Growth Area 1 - Central and Urban Chelmsford Para 7.7 | Support for Growth Area 1, and the protection of existing AW's assets on relevant sites.   | Noted. <b>No modification required to the Plan.</b>   |

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| Additional Sites Document | AS-1033, AS-1090, AS-1091, AS-1093, AS-1094, AS-1095 | All site policies in the plan                | All site policies to include reference to AW's Surface Water Risk Management Guidance in supporting text.  | <p>To avoid duplication in the Plan, rather than modifying all site policies, <b>modify para. 8.168 of Policy DM18</b> to include reference to the guidance. This change also applies to sites in the Pre Submission Plan:</p> <p>Surface water connections to the public sewerage network should only be made where it can be demonstrated that there are no feasible alternatives (this applies to new developments and redevelopments) and where there is no detriment to existing users. <u>Development proposals should have regard to Anglian Water's Surface Water Risk Management Guidance.</u></p> |
| Pre-Submission Plan       | PSQ25-6400<br>PSQ25-6401<br>PSQ25-6402               | Strategic Growth Site Policies 7a, 7b and 7c | Support requirements for developments to demonstrate sufficient capacity for wastewater treatment and disposal to serve the site. Agree with recommendations in the WCS Stage 2 2024 that development may require a suitable phasing plan to align with our future investment plans. | Noted. <b>No modification required to the Plan.</b>   |
| Pre-Submission Plan       | PSQ25-6403<br>PSQ25-6404<br>PSQ25-6405               | Strategic Growth Site Policies 7a,           | Remove "Although this is not a barrier to new development growth", as current capacity and future  | Whilst the growth will need to be phased appropriately to align with future growth investments, the policy  |

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|-----------------------|--|--|---|--|
|                       |  | 7b and 7c. Paragraphs 7.265/7.280/7.294                                    | permit requirements are constraints that will require alternative solutions to be investigated and considered in terms of their feasibility and deliverability. | text should be retained as it is factually correct. <b>No modification required to the Plan.</b>   |
| Pre-Submission Plan   | PSQ25-6403<br>PSQ25-6404<br>PSQ25-6405 | Strategic Growth Site Policies 7a, 7b and 7c. Paragraphs 7.265/7.280/7.294 | For completeness, add 'subject to the necessary environmental permitting processes' to the end of the paragraph.  | <b>Agreed. Modify paras. 7.265, 7.280 and 7.294:</b><br>Great Leighs Water Recycling Centre (WRC) does not currently have sufficient capacity to deal with the proposed growth at Great Leighs. Although this is not a barrier to new development growth, additional capacity will need to be provided by AW as part of their business planning process and subject to approval by the Environment Agency of any proposed increase of discharges to waterbodies which exceed current permit limits. Any increase in flows are subject to the provisions of the Water Framework Directive. Additional capacity could include improvements to the existing Great Leighs WRC and/or on-site wastewater treatment systems solutions, <u>subject to the necessary environmental permitting processes.</u> |

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|---------------------------|------------------|---|--|---|
| Additional Sites Document | AS-1092, AS-1096 | Strategic Growth Sites 7b and Growth Site 14b | Support requirements for developments to demonstrate sufficient capacity for wastewater treatment and disposal to serve the site. As outlined in the WCS Addendum, the proposed quantum of growth in Great Leighs catchment would exceed the DWF by the end of the plan period, and therefore a growth scheme would be required to increase the DWF permit to accommodate the proposed allocations although there is some initial capacity to accommodate growth at the WRC in the short term. | Noted. <b>No modification required to the Plan.</b> |
| AS-1092                   | AS-1092, AS-1096 | Strategic Growth Sites 7b and Growth Site 14b | The WCS correctly identifies that the measures to reduce phosphates limits at the WRC means that a future DWF growth scheme is likely to lead to tighter permit limits for phosphorus. We agree with the recommendations that development must not be delivered until there is sufficient capacity available at the WRC and this may require a suitable phasing plan to align with our future investment plans.  | Noted. <b>No modification required to the Plan.</b> |

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|---------------------------|------------|---|---|---|
| Additional Sites Document | AS-1092    | Strategic Growth Sites 7b and Growth Site 14b | Our next DWMP (DWMP28) is currently being prepared. This is a collaborative long-term strategic plan highlighting the known and expected future risks to drainage and identifying solution strategies to mitigate these risks. This includes understanding how to deal with challenges such as asset health, climate change and population growth. Using this information, we will conduct a risk assessment for short, medium and long time scales. The outputs from these allow us to develop 'best value' investment solutions to meet our obligations in future Business Plans. | Noted. <b>No modification required to the Plan.</b> |
| Pre-Submission Plan       | PSQ25-6406 | Strategic Growth Site 10                      | Support requirements for developments to demonstrate sufficient capacity for wastewater treatment and disposal to serve the site. As outlined in the WCS Stage 2, the dry weather flow will be exceeded at the South Woodham Ferrers WRC based on the proposed growth and current headroom is very limited. However, the AW PR24 Business Plan identified a growth scheme at South  | Noted. <b>No modification required to the Plan.</b> |

| Consultation Document     | Rep Number  | Local Plan Reference  | Summary of representation  | Agreed resolution and any proposed modifications  |
|---------------------------|---|---|--|---|
|                           |   |   | Woodham Ferrers WRC for AMP8 to enable growth to come forward  |   |
| Additional Sites Document | AS-1033, AS-1094, AS-1095, AS-1097, AS-1100, AS-1102, AS-1103 | Strategic Growth Site Policies 1dd, 11c, 17d and 20 And Growth Site Policies 9b, 9c and 21a | <p>As there are existing sewers protected by easements, the following para should be added to the site policy:</p> <ul style="list-style-type: none"> <li>the safeguarding of suitable access for the maintenance of existing sewerage infrastructure</li> </ul> | <p><b>Modify Site Policy, ‘Design and Layout’ sub heading of 1dd, 9b, 9c, 17d, 21a, 11c, 20 by adding the following bullet.</b> This ensures consistency with the Local Plan which already uses the same text in relevant site allocation policies:</p> <ul style="list-style-type: none"> <li><u>Layout shaped by utility easements</u></li> </ul> <p><b>Modify Reasoned Justification for all the above policies by adding:</b></p> <p><b>For SGS1dd:</b> Add the following new paragraph after paragraph 2.15 <u>‘There are existing surface water sewers within the site boundary. Layout should safeguard suitable access for the maintenance of sewerage infrastructure.’</u></p> <p><b>For GS9b, GS9c:</b> Add the following new paragraph after paragraph 2.83 and 2.97: <u>‘There is a rising main (pressurised sewer) within the site boundary. Layout should safeguard</u></p> |

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|                       |            |                      |                           | <p><u>suitable access for the maintenance of sewerage infrastructure.'</u></p> <p><b>For SGS17d, GS21a:</b> Add the following new sentence to the end of paragraph 2.151 and 2.187: <u>'There is a rising main (pressurised sewer) within the site boundary. Layout should safeguard suitable access for the maintenance of sewerage infrastructure.'</u></p> <p><b>For SGS11c:</b> Add the following new paragraph after paragraph 2.125. <u>'There is a surface water sewer within the site boundary. Layout should safeguard suitable access for the maintenance of sewerage infrastructure.'</u></p> <p><b>For SGS20:</b> Add the following new paragraph to the end of paragraph 2.179. <u>'There are gravity sewers and a surface water sewer and discharge point within the site boundary. Layout should safeguard suitable access for the maintenance of sewerage infrastructure.'</u></p> |

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|                           |  |  |  | <p>For completeness, modify GS1f in the Pre-Submission Local Plan by adding to the 'Design and Layout' sub heading:</p> <ul style="list-style-type: none"> <li>• <u>Layout shaped by utility easements</u></li> </ul> <p>No change is required to the Reasoned Justification to GS1f as this is already covered by paragraph 7.81.</p>   |
| Additional Sites Document | AS-1098, AS-1100, AS-1101, AS-1102, AS-1103, AS-1104 | Strategic Growth Site Policies 17c, 17d and 20 and Growth Site Policies 17e, 21a and 21b | Add reference to use of pre-occupancy conditions on planning permissions for sites served by South Woodham Ferrer's WRC to prevent any detriment to the environment in advance of completing enhancements works scheduled in AMP8 (2025-2030). | The Local Plan should be read as a whole and other policies will ensure this issue can be adequately addressed. For example, the importance of having adequate infrastructure in place to support a development is supported by Policy S4 and S10. Policy S4 requires developers to demonstrate that sufficient waste water treatment capacity is available ahead of occupation to ensure no deterioration in the quality of receiving waters. Policy S10 also states that permission will only be granted if it can be demonstrated that there is sufficient appropriate infrastructure capacity to support the development |

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|---------------------------|---|--|---|---|
|                           |   |  |   | or that such capacity can be delivered by the proposal. <b>No modification required to the Plan.</b>  |
| Additional Sites Document | AS-1144, AS-1145, AS-1146, AS-1147, AS-1148, AS-1149, AS-1150 | Strategic Growth Sites 17c, 17d and 20 and Growth Sites 17e, 21a and 21b<br><br>Section 4 – Development Trajectory | The smaller sites (cited for completion in year 27/28) should be phased to complete in 29/30 to align with delivery of the growth scheme. | It would not be prudent to change the phasing of the small sites served by South Woodham Ferrers WRC as it is anticipated that these sites will be coming forward very soon, perhaps before the plan is adopted. The number of houses coming forward on these sites are only a small proportion of all sites coming forward that are and being served by this WRC. In addition, the housing trajectory is updated annually. However, the plan should be read as a whole and the importance of having adequate infrastructure in place to support a development is supported by Policy S4 and S10. Policy S4 requires developers to demonstrate that sufficient waste water treatment capacity is available ahead of occupation to ensure no deterioration in the quality of receiving waters. Policy S10 also states that permission will only be granted if it can be demonstrated that there is sufficient appropriate infrastructure capacity to support the development |

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|-----------------------|------------|----------------------|---------------------------|--|
|                       |            |                      |                           | or that such capacity can be delivered by the proposal. <b>No modification required to the Plan.</b> |

### 3. Areas without agreement

| Consultation Document | Rep Number | Local Plan Reference | Summary of representation   | CCC response  |
|-----------------------|------------|----------------------|---|---|
| Pre-Submission Plan   | PSQ25-6394 | DM18, Part C         | General support for the policy. Endorse recommendations in Strategic Flood Risk Assessment Level 1 and reiterated in the WCS Stage 2 to ensure Sustainable Drainage Systems (SuDS) are incorporated in all new development proposals and not just for major development. Proposals to provide reasoned justification for not using SuDS techniques, where ground conditions and other key factors show them to be technically feasible. | The inclusion of SuDS in all new development proposals is agreed, but it is recognised that this may not always be practical. Major developments will have a spatial element and thus it is feasible to provide SuDS. The remaining categories of development cover an enormous range, many of which have no or minimal land, for example a change of use, structures such as fences or telecoms, hence the policy is worded to capture development where there is most opportunity to secure flood risk measures. It is also not proportionate to require SuDS for many of these developments especially if located in Flood Zone 1. Development in an area of flood risk will have to do a Flood Risk Assessment and will have to specify |

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|-----------------------|------------|----------------------|---------------------------|--|
|                       |            |                      |                           | how the flood risk will be managed which following the SuDS hierarchy means it will include SuDS anyway.<br><b>No modification required to the Plan.</b> |

#### 4. Governance and on-going cooperation

CCC will continue to work collaboratively with AW to address matters that, in addition to those above, arise through the examination process. This will occur on an ongoing basis through emails and/or meetings and the SOCG will be kept up to date accordingly.

It is agreed that CCC is working collaboratively with AW to ensure that matters are properly considered and where appropriate reflected in the review of the Local Plan and effective and on-going joint working has and will continue to be undertaken.

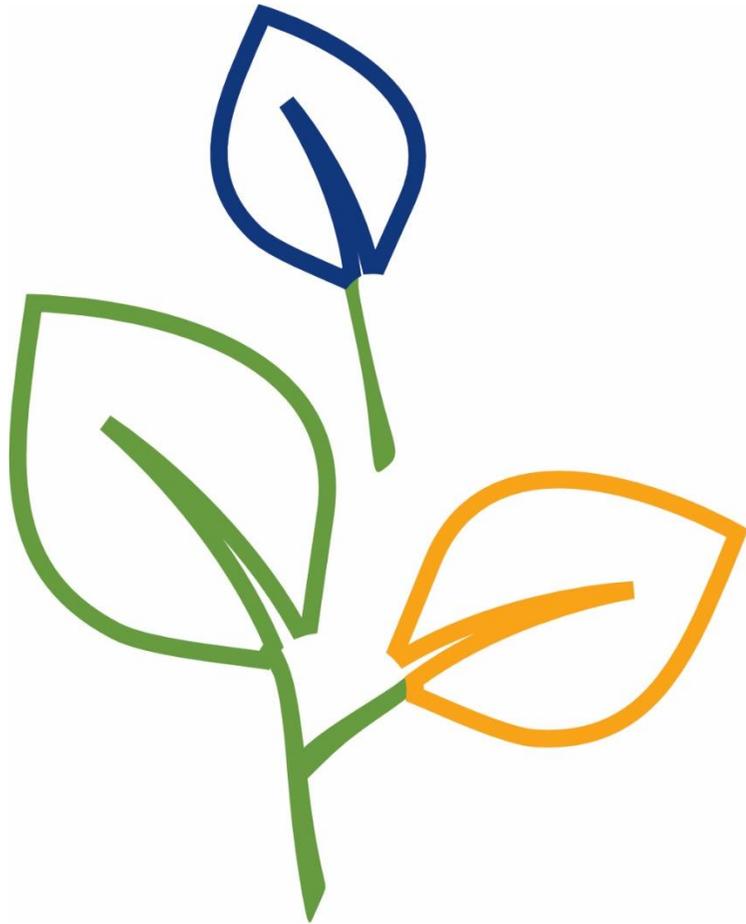
#### 5. Signatories

|   |   |
|---|---|
| Signed on behalf of Chelmsford City Council<br><b>Jeremy Potter</b><br><b>Spatial Planning Services Manager</b><br><br><i>Jeremy Potter</i><br><br>Date: 16.03.26 | Signed on behalf of Anglian Water<br><br><b>Phil Jones</b><br><b>Growth Strategy Manager</b><br><br><i>Phil Jones</i><br><br>Date: 19.03.26 |
|---|---|

**Appendix A** – Map of Chelmsford City Council’s administrative area in context with its neighbouring districts and county councils.

Chelmsford City Council is adjoined by seven local planning authorities. Essex County Council is the local Highways and Transportation Authority and Education Authority. It is also responsible for the Minerals and Waste Local Plans with Southend-on-Sea Unitary Authority.





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