SD003

Chelmsford Local Plan

Regulation 22
Consultation Statement

June 2026



Our Planning Strategy 2022 to 2041

Chelmsford Local Plan

Index

1	**Introduction/Background**	2
2	**Who We Consulted**	4
3	**How We Consulted**	5
4	**How We Responded**	7
5	**Appendices**	9

Appendix A	**Issues and Options - You Said We Did Feedback Report**
Appendix Ai	**Issues and Options List of Respondents**
Appendix B	**Preferred Options - You Said We Did Feedback Report**
Appendix Bi	**Preferred Options List of Respondents**
Appendix C	**Pre-Submission - You Said We Did Feedback Report**
Appendix Ci	**Pre-Submission List of Respondents**
Appendix D	**Focused Consultation Additional Sites - You Said We Did**
Appendix Di	**Focused Consultation Additional Sites List of Respondents**

1. Introduction / background

1.1 Chelmsford City Council has completed four formal stages of consultation on its review of the adopted Local Plan.

1.2 This Consultation Statement sets out the processes undertaken by Chelmsford City Council for community participation and stakeholder involvement in producing the Local Plan submitted for Examination in Public. It also sets out how the main issues raised through consultation have helped to shape the Plan.

1.3 The Consultation Statement has been prepared to meet the requirements of Regulations 18, 19 and 22 (1) Part (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (under saving and transitional provisions announced in 2026). The Consultation Statement will assist the Inspector at the Examination in Public to determine whether the processes that the Council followed, leading to the Submission of the Local Plan, comply with Government guidance and requirements for public participation.

1.4 In detailing what the requirements are for the 'Submission of documents and information to the Secretary of State', Regulation 22 (1) Part (c) directs the Council to prepare a statement which sets out:

i. which bodies and persons the local planning authority invited to make representations under Regulation 18 (of the Local Planning Regulations);
ii. how those bodies and persons were invited to make representations;
iii. a summary of the main issues raised in those representations;
iv. how any representations have been taken into account;
v. if there are representations made under Regulation 20, the number made and a summary of the main issues made in those representations; and
vi. if there are no representations made under Regulation 20, that no such representations were made.

This Statement has been prepared to fulfil that requirement.

1.5 Consultation was carried out, and feedback reports published, as indicated below:

Consultation Stage	Dates	Feedback published
Issues and Options (Regulation 18)	11 August 2022 – 20 October 2022	February 2023 and March 2024
Preferred Options (Regulation 18)	8 May 2024 – 19 June 2024	October 2024 and February 2025
Pre-Submission (Regulation 19)	4 February 2025 – 18 March 2025	July 2025 and May 2026
Focused Consultation Additional Sites (Regulation 19)	20 November 2025 – 8 January 2026	March 2026 and May 2026

1.6 In addition to complying with the Regulations, the Council has also complied with the provisions of its Statement of Community Involvement (SCI), including an earlier version and the latest version published in November 2025. This sets out the Council's strategy for effective community participation in the planning process, including for a Local Plan.

1.7 The Council also considers that the necessary legal and procedural processes have been undertaken throughout the preparation of the Local Plan. This is set out in a Submission Local Plan Process Requirements Checklist (link to follow) which was published in May 2026, as part of the suite of Local Plan submission documents.

1.8 All the comments received to each stage of consultation can be viewed in full on the Council's Consultation Portal at www.chelmsford.gov.uk/planningpolicyconsult

1.9 Details of the Local Plan – Submission can be seen at www.chelmsford.gov.uk/lp-review

2. Who we consulted

2.1 The Council has consulted extensively at all stages of preparing the Local Plan, to encourage the maximum level of feedback.

2.2 At each stage, the Council has consulted the following bodies and persons:

- Statutory bodies including Essex County Council, neighbouring local planning authorities, local Parish and Town Councils, utility companies, health bodies, and Government bodies such as National Highways, Natural England, Historic England and the Environment Agency
- Local stakeholders including Essex Police, Essex Bridleways Association, Sport England, and Anglia Ruskin University and Essex Local Access Forum
- Developers and landowners and their agents
- Local businesses, voluntary and community groups
- The public.

2.3 To aid the consultation process, the Council maintains a consultee database (hosted by Objective) which is continuously updated. The number of consultees has grown from 2,100 in August 2022 to more than 10,100 in May 2026.

2.4 This report also includes a list of all those organisations consulted (but not including individual members of the public) at each stage at the end of each of the Appendices as follows:

Issues and Options – Appendix Ai
Preferred Options – Appendix Bi
Pre-Submission – Appendix Ci
Focused Consultation Additional Sites – Appendix Di

3. How we consulted

3.1 A wide range of consultation activity was carried out for each stage of the consultation.

3.2 This is captured in the table below, with dates activities took place. Copies of consultation material are included within the appendices as follows:

Issues and Options (I&O)	Appendix A
Preferred Options (PO)	Appendix B
Pre-Submission (PS)	Appendix C
Focused Consultation Additional Sites (AS)	Appendix D

Activity	I&O	PO	PS	AS	Date
Documents at CCC Reception	•				11 Aug 22
		•			8 May 24
			•		4 Feb 25
				•	20 Nov 25
Consultee notification	•				11 Aug 22
		•			8 May 24
			•		4 Feb 25
				•	20 Nov 25
Public exhibitions (number of)	5				Sep/Oct 22
		8			May/Jun 24
			5		Feb/Mar 25
				5	Nov/Dec 25
Parish/Town Council Forum and Developer/Agent Forum	•				Sept 22
		•			May 22
			•		Feb 25
				•	Dec 25
Public Notice	•				Aug 22
		•			May 24
			•		Feb 25
				•	Nov 25
Posters and summary leaflets to Parish/Town Councils, CCC offices, leisure facilities, post offices, shops, churches, surgeries	•				Aug 22
		•			May 24
			•		Feb 25
				•	Nov 25
Leaflet handouts at Chelmsford (C) and South Woodham Ferrers (SWF) rail stations	C/SWF				Sept 22
		SWF			May 22
Adverts/articles in publications including Business News, Moulsham Times, Chelmsford Times, South Woodham Focus, Essex Life (not all at each stage)	•				Sep/Oct 22
		•			May/Jun 24
			•		Feb/Mar 25
				•	Nov/Dec 25
Parish information packs sent to Parish/Town Councils for newsletters	•				Sept 22
		•			May 22
			•		Feb 25
				•	Nov 25
City Life e-newsletter articles	•				Sep/Oct 22
		•			May/Jun 24

Activity	I&O	PO	PS	AS	Date
			•		Feb/Mar 25
				•	Nov/Dec 25
Social media posts	•				Aug-Oct 22
		•			May/Jun 24
			•		Feb/Mar 25
				•	Nov 25-Jan 26
Website updates	•				Aug-Oct 22
		•			May/Jun 24
			•		Feb/Mar 25
				•	Nov 25 ongoing
Site notices at proposed sites		•			May-Jun 24
			•		Feb-Mar 25
				•	Nov 25-Jan 26
Pop-Up displays at 4 Council venues across consultation period	•				Aug-Oct 22
		•			May/Jun 24
			•		Feb/Mar 25
				•	Nov 25-Jan 26

3.3 Exhibition materials were also available online, and from Preferred Options stage a Local Plan video has been permanently available for viewing via the Council's website.

3.4 In addition, Officers attended and gave presentations to a number of groups such as Writtle University College, Essex Developers Group, and One Chelmsford Board. CCC has also arranged a number of Duty to Co-operate meetings with key bodies, which is outlined in a separate Local Plan Statement of Co-operation (link to follow)

4. How we responded

Regulation 18 Consultation

4.1 CCC undertook two stages of consultation under Regulation 18 as follows:

Issues and Options (Regulation 18)	11 August 2022 – 20 October 2022
Preferred Options (Regulation 18)	8 May 2024 – 19 June 2024

4.2 The Issues and Options stage was not a legal requirement, but was undertaken to ensure the Council carried out a comprehensive consultation.

4.3 Feedback reports were produced as follows:

4.4 **Issues and Options Consultation Document Feedback Reports**
An initial high-level report of key issues raised was set out in the Issues and Options Consultation Document Feedback Report, presented to Chelmsford Policy Board on 28 February 2023 and then published online.

4.5 This was followed in May 2024 with the publication of Issues and Options - You Said We Did, based on the Issues and Options Consultation Feedback Report with the addition of a summary of the key comments received, the Council's response to the comments, and details of how the comments were taken into consideration in preparing the Local Plan – Preferred Options document.

4.6 The Issues and Options – You Said We Did is included in this Statement at Appendix A.

4.7 **Preferred Options Feedback Reports**
An initial high-level report of key issues raised was set out in the Preferred Options Consultation Document Feedback Report, presented to Chelmsford Policy Board on 26 September 2024 and then published online.

4.8 This was followed in February 2025 with the publication of the Preferred Options – You Said We Did, based on the Preferred Options Consultation Feedback Report with the addition of a summary of the key comments received, the Council's response to the comments, and details of how the comments were taken into consideration in preparing the Local Plan – Pre-Submission document.

4.9 The Preferred Options - You Said We Did is included in this Statement at Appendix B.

Regulation 19 Consultation

4.10 CCC undertook two stages of consultation under Regulation 19 as follows:

Pre-Submission (Regulation 19)	4 February 2025 – 18 March 2025
Focused Consultation Additional Sites (Regulation 19)	20 November 2025 – 8 January 2026

4.11 Feedback reports were produced as follows:

4.12 **Pre-Submission Consultation Document Feedback Reports**
An initial high-level report of key issues raised was set out in the Pre-Submission Consultation Document Feedback Report, presented to Chelmsford Policy Board on 26 June 2025 and then published online.

4.13 This was followed in May 2026 with the publication of the Pre-Submission Consultation Document – You Said We Did, based on the Pre-Submission Consultation Document Feedback Report with the addition of a summary of the key comments received, and details of the Council's response to the comments. This is included in this report at Appendix C.

4.14 All the comments received have been taken into consideration as part of the preparation for Submission of the Local Plan to the Secretary of State, for Examination. A Schedule of Proposed Changes (link to be added) has been prepared to submit with the Local Plan to provide the Inspector the most up-to-date position, to address any issues that have been raised through the representations received to the Pre-Submission Local Plan, issues agreed through Statements of Common Ground, and other changes to ensure clarity and consistency.

4.15 **Focused Consultation Additional Sites (Regulation 19) Feedback Reports**
An initial high-level report of key issues raised was set out in the Focused Consultation Additional Sites (Regulation 19) Feedback Report, presented to Chelmsford Policy Board on 19 March 2026 and then published online.

4.16 This was followed in May 2026 with the publication of the Focused Consultation Additional Sites (Regulation 19) – You Said We Did, based on the Focused Consultation Additional Sites (Regulation 19) Feedback Report, with the addition of a summary of the key comments received, and details of the Council's response to the comments. This is included in this report at Appendix D.

4.17 As with the Pre-Submission Consultation Document – You Said We Did, all the comments received have been taken into consideration as part of the preparation for Submission of the Local Plan to the Secretary of State, for Examination. The Schedule of Proposed Changes (link to be added) includes proposed changes to address any issues that have been raised through representations received to the Focused Consultation Additional Sites (Regulation 19), issues agreed through Statements of Common Ground, and other changes to ensure clarity and consistency.

Summary figures for representations received

4.18

Consultation Stage	Responses	Respondents
Issues and Options (Regulation 18)	1,178	711*
Preferred Options (Regulation 18)	10,418	3,678
Pre-Submission (Regulation 19)	6,725	2,798
Focused Consultation Additional Sites (Regulation 19)	1,082	780 **

* plus a petition of 2,202 signatures
** including a petition of 178 signatures

4.19 Lists of all organisations which made a comment are included in each Appendix, and are linked from the index page.

Appendix A

Chelmsford Local Plan

Issues and Options Consultation Document

You Said We Did Feedback Report

May 2024



Our Planning Strategy 2022 to 2041

Chelmsford Local Plan

Table of Contents

Abbreviations 2

Executive Summary 3

Introduction 6

Purpose of this 'You Said We Did' Report 6

Section 1. Summary of Consultation Undertaken 7

Section 2. Summary of Representations 9

Section 3. Main Issues Raised in Consultation Responses 13

Appendix 1: Organisations consulted and copies of key consultation materials 160

Abbreviations

BNG	Biodiversity Net Gain
CCC	Chelmsford City Council
CLT	Community Land Trust
DSB	Defined Settlement Boundary
ECC	Essex County Council
EDG	Essex Design Guide
EPOA	Essex Planning Officers Association
EqIA	Equality Impact Assessment
EV	Electric Vehicle
GI	Green Infrastructure
GTAA	Gypsy and Traveller Accommodation Assessment
HAR	Heritage At Risk
HIA	Health Impact Assessment
HMO	House in Multiple Occupation
IDP	Infrastructure Delivery Plan
IIA	Integrated Impact Assessment
IWM	Integrated Water Management
LCWIP	Local Walking and Cycling Infrastructure Plan
LNR	Local Nature Reserve
LNRS	Local Nature Recovery Strategy
LPA	Local Planning Authority
LTP	Local Transport Plan
MMO	Marine Management Organisation
NCN	National Cycle Network
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
SANG	Suitable Alternative Natural Greenspace
SGS	Strategic Growth Site
SME	Small and Medium Sizes Enterprises
SHELAA	Strategy Housing and Employment Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SHNA	Strategic Housing Needs Assessment
SRA	Specialist Residential Accommodation
SPA	Special Policy Area
SPD	Supplementary Planning Document
TCPA	Town and Country Planning Association
UAB	Urban Area Boundary

Executive Summary

This report sets out:

- Summary of the consultation undertaken (Section 1)
- Summary of representations received (Section 2)
- The main issues raised in the representations received and summary of how the Preferred Options Local Plan has been informed by the previous comments and the plan evidence base (Section 3).

It supersedes the Issues and Options Feedback Report published in February 2023.

The Issues and Options consultation document sought to gather views on the key issues for the future growth and development of the city and potential approaches for accommodating projected growth requirements up to 2041.

About the Consultation

A comprehensive ten-week programme of consultation took place during the extended consultation period which ran from 11 August to 20 October 2022. The consultation was promoted through a range of activities including email/letter notifications to more than 2,100 contacts registered on the Council's Consultation Portal, on the Council's website, press releases, adverts in local publications and social media. Consultation activities included placing consultation documents on deposit at the Council's Customer Service Centre, organised stakeholder presentations, Duty to Co-operate meetings, a virtual exhibition and staffed physical exhibitions.

Summary of responses to the Issues and Options Local Plan

A total of 1,178 responses were received to the Issues and Options Local Plan consultation from 711 respondents, along with a petition of 2,202 signatures opposed to exploring a new settlement at Hammonds Farm (Spatial Approach E, within Little Baddow/Sandon parishes).

The respondents are from a wide variety of groups and individuals including residents, developers, landowners and their agents, businesses and statutory bodies such as other local authorities and Parish/Town Councils. All the comments received can be viewed on the Council's planning policy consultation portal.

The consultation asked for views on the key issues and options contained within the consultation document through 66 questions. An overview of the key issues raised to key areas we consulted on are:

Strategic Priorities:

- Overall support for the draft Strategic Priorities as they are stronger, clearer and better focused
- New Strategic Priorities 1 and 2 are particularly welcomed
- Some detailed wording amendments are proposed

- Some land promoters urge a review of the Green Belt to avoid a distorted settlement growth pattern, to release sites which may be more sustainable, and to locate housing where the need arises
- Some additional Strategic Priorities are suggested including cross boundary planning, solar panels on new homes, action on empty homes, the circular economy and commitment to funding infrastructure.

Vision

- Supporters welcome it for being clear and concise
- Objectors consider it is too vague, unmeasurable and not Chelmsford specific enough
- Some suggest additional wording including adding in 'healthier'
- Could be more outward looking and reflect Chelmsford's role as a regional centre
- Too Chelmsford City specific
- Many support refining the adopted plan vision.

Spatial Principles:

- Good level of general support regarding their context, but suggestions that they should be directly measurable, more precise and have less ambiguous wording
- Many developers consider there should be a review of the Green Belt
- Many of the public thought they were admirable but unobtainable
- Some detailed wording amendments are proposed
- Some unclear of the purpose of the Spatial Principles and question if they are unnecessary duplication
- Some suggest there is a need to do more to support the rural community and economy.

Meeting the needs for new homes:

- General good level of support for using the standard method to calculate housing needs, having the 20% supply buffer, and for the Council to meet its own housing needs, though this needs to be clearly evidenced and explained
- Several suggest that the Council is overproviding for housing so it should consider taking some of other South Essex Authorities needs
- Limited support for affordable housing sites on the edge of Defined Settlement Boundaries as they may isolate residents
- Some consider there is a need for specific policies to address Specialist Residential Accommodation, with particular reference made to the needs of older persons
- Reasonable support for a higher housing number to help meet the needs of specific groups (including affordable housing)
- Some suggestion that 10% of the housing requirement being on small sites could be higher to support small and medium builders.

Types of location for growth and Spatial Strategy Approaches for accommodating additional future growth to 2041:

- Respondents commented on the types of location, with many focused on one of the five Spatial Approaches – with a mixed reception overall
- Growth in urban areas is supported as a sustainable approach
- Expanding allocated sites raised concerns about the ability of infrastructure to cope, although is supported for sustainability
- Growth along transport corridors received a mixed response: the A12 should be included, it can provide good access, but it may direct growth away from the city
- Development at larger villages is not supported due to impact on Danbury and South Woodham Ferrers, although sustainability is seen as more important than village size
- Development at smaller villages is not supported due to impact on small community character, access and services, although it could support local vitality
- A new large settlement is generally opposed for a wide number of reasons including landscape, environment, loss of agricultural land, impact on services and roads, lack of flexibility, potential delays in delivery; although limited support shown for a sensitive approach.

How the comments have been used

The responses received to the consultation alongside ongoing discussions with infrastructure providers about their services, such as education, and completion of evidence studies covering topics including traffic modelling, landscape and flood risk have been used to help inform the Preferred Options Local Plan. The Preferred Options Local Plan also reflects national guidance and will be subject to public consultation.

Introduction

The Issues and Options consultation represented the first formal stage in the preparation of the Review of the Adopted Chelmsford Local Plan. The consultation document set out the key issues for the future growth and development of the city and potential approaches for accommodating the projected growth requirements up to 2041. The consultation was undertaken in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Purpose of this 'You Said We Did' Report

This report sets out the consultation feedback received on the Issues and Options document and how the comments have been taken into consideration alongside the plan evidence base when preparing the Preferred Options Local Plan.

This report sets out:

- Summary of the consultation undertaken (Section 1)
- Summary of representations received (Section 2)
- The main issues raised in the responses received on the Issues and Options Local Plan (in question order) and summary of how the Preferred Options Local Plan has been informed by the responses and plan evidence base (Section 3).

The report does not summarise all the representations or identify every individual issue. It also does not provide a Chelmsford City Council (CCC) response to each individual comment. A summary is provided of what the evidence says about the topic area and an overview of how this issue is addressed in the Preferred Options Local Plan.

This report supersedes the Issues and Options Feedback Report published in February 2023.

Section 1. Summary of Consultation Undertaken

A comprehensive ten-week programme of consultation took place during the formal consultation period. This was originally planned from 11 August to 6 October 2022, covering eight weeks, rather than the statutory six weeks, to allow extra time due to the consultation starting within the summer holiday period. The consultation period was extended by a further two weeks until 20 October following the death of Her Majesty, Queen Elizabeth II, to allow some consultation events to be rescheduled.

This programme of consultation followed (and exceeded) the requirements set out in legislation[1], and the commitments in the Council's adopted Statement of Community Involvement (September 2020)[2].

The package of documents published on 11 August comprised:

- Issues and Options Consultation Document; and
- Integrated Impact Assessment (subject of a separate Feedback Report); and
- Consultation Statement outlining full details about the consultation process.

This package of documents was placed on deposit at CCC Customer Service Centre, with electronic versions available to view at most Parish Council offices and local libraries.

The Council notified more than 2,100 contacts registered on its Consultation Portal. These included public, statutory agencies such as Essex County Council and Parish Councils, utility companies, businesses, interest groups, and voluntary and community bodies. Council Members and staff were also notified.

A number of consultation events were arranged:

- Four staffed exhibitions, including a Member and staff drop-in, visited by more than 80 people
- 20 days of unstaffed exhibitions
- Four pop-up displays for the whole consultation period
- A bespoke Local Plan video, attracting 850 views
- An online virtual exhibition, visited by more than 330 visitors
- A live webinar (an experimental event with 4 attendees)
- Officers also held targeted engagement with the Parish/Town Council Forum and Agent/Developers Forum, and presented at the North West Parishes Group.

[1] Town and Country Planning (Local Planning) (England) Regulations 2012 https://www.legislation.gov.uk/uksi/2012/767/contents

[2] Statement of Community Involvement https://www.chelmsford.gov.uk/media/byjfrq2v/statement-of-community-involvement-adopted-september-2020.pdf

Printed/online materials and advertisements were produced as follows:

- Web page with links to key materials
- Two advertisements in a local newspaper
- Five articles in City Life (CCC's online news website), one in South Woodham Focus (independent community magazine)
- 32 social media posts
- Posters distributed to Parishes, CCC offices and leisure facilities, post offices, doctors' surgeries, churches and local shops
- Two large public car park posters
- Summary newsletter widely available, in addition to being handed out at Chelmsford and South Woodham Ferrers railway stations
- Three gov.delivery mailshots to 12,000 recipients.

A list of organisations consulted, and copies of key consultation materials are given in Appendix 1.

Integrated Impact Assessment of the review of the Adopted Local Plan: Issues and Options Consultation

The Local Plan Integrated Impact Assessment (IIA) was also subject to consultation at the same time. The IIA brings various strands of assessment together, consisting of the Sustainability Appraisal, Strategic Environmental Assessment, Habitats Regulations Assessment, Health Impact Assessment, and Equalities Impact Assessment. Feedback on this document is summarised in a separate report prepared by the Council's IIA Consultants. A summary of how the representations have been used is set out in the Preferred Options IIA.

Call for Sites

In addition to the Local Plan and IIA consultations, the Council undertook a Call for Sites to identify available land for consideration for future development. Around 100 further sites were submitted through this process. An assessment of the sites received is contained within the 2023 Strategy Housing and Employment Land Availability Assessment (SHELAA) published on our website.

How the comments have been used

All responses have been considered in detail and used to help inform the next stage of the review Local Plan (the Preferred Options Consultation Document). This is alongside ongoing discussions with infrastructure providers about their services, such as education, and completion of evidence studies covering topics including traffic modelling, landscape and flood risk. The Preferred Options will also reflect national planning policy guidance and be subject to public consultation.

Section 2. Summary of Representations

For this report, people and organisations who made a comment to the consultation are called ‘respondents’.

Methodology

Respondents had a choice of ways to make their comments, by:

- Answering questions included in a complete version of the consultation document published on the consultation portal
- Answering questions using a stand-alone online questionnaire published on the consultation portal
- Sending written comments in an e-mail
- Sending written comments by post.

There were 66 questions, mostly consisting of a main question with related questions seeking views and missing information, plus two monitoring questions.

Whichever method respondents used, all comments have been entered into the Council’s consultation portal. Where respondents did not state which question they were answering, officers have assigned responses to the most relevant question, with miscellaneous responses being recorded against Question 62. Where a preference was invited (i.e. a yes or no answer), these have been recorded only where the respondent stated their preference. The questions for both online methods of response were identical, and have been combined for this report.

A small number of representations were received after the consultation closed, by prior agreement with officers, and these have been analysed and included in the figures in this report. In addition, five representations were considered to be ‘inadmissible’ due to their content. In these cases, as far as possible, the main point of the representation has been recorded minus the offending remarks.

To ensure proper consideration of issues, respondents have been divided into types depending on their interface with the Council. Some fall into more than one category, so totals may exceed the overall number of respondents. Similarly some respondents made their comments via more than one method so the totals for how comments were made is greater than the total number of comments received.

The assessment of responses will focus on the issues raised, rather than the number of representations to any individual question.

Overview of responses

A total of 1,178 responses were received to the consultation from 711 respondents, along with a petition of 2,202 signatures opposed to exploring a new settlement at Hammonds Farm (Spatial Approach E, within Little Baddow/Sandon parishes).

These respondents are from a wide variety groups and individuals including residents, developers, landowners and their agents, businesses and statutory bodies such as other local authorities and Parish/Town Councils.

It should be noted that the numbers included under the 'Key statistics' sections in this feedback report, and the number of responses received to each question will not amount to the totals set out above as people did not have to answer every question.

Comments by respondent type:

Type of Respondent	Explanation	Number of Respondents
Duty to Co-operate (DTC) bodies[3]	Key bodies consulted on strategic matters, including Essex County Council, adjoining local authorities, Historic England, Natural England, Environment Agency	12
Specific bodies/groups	Parish/Town Councils, utility bodies, health and transport consultees etc	30
General and Other bodies/groups	Voluntary groups, religious groups, housing providers, businesses etc	18
Developers/landowners	Landowners, promoters of land and their agents	91
Public	Individual members of the public	560

How people made their comments:

Method of making comments	Number of Respondents	Percentage
Online consultation portal	89	12.5%
E-mail	174	24.5%
Letter	448	63%

Higher than the anticipated/normal number of letters and e-mails were received, due to comments being sent on pre-printed forms prepared by Little Baddow Parish Council, expressing opposition to exploring a new settlement at Hammonds Farm (Spatial Approach E, within Little Baddow/Sandon parishes).

All the comments received can be viewed on the Council's planning policy consultation portal.

When viewing the portal, you will see the list of recent consultation events. Events which are open for consultation show a green timeline and the word 'open'. Those which are closed show a red timeline and the word 'closed'.

To view comments, you need to:

- Choose the event you would like to view comments for
- Select 'learn more' to open the event page

[3]Duty to Co-operate Strategy, January 2022 https://www.chelmsford.gov.uk/media/4e5awghr/duty-to-co-operate-strategy-january-2022.pdf

- Click on the ‘what people say’ tab to display a list of all the comments
- You can read all comments, or sort by name or date we received them
- Where additional information such as reports or maps were submitted with a comment, these are listed at the end of the comment in PDF format, and can be viewed or downloaded.

Responses to questions included in the complete version of the full document are prefixed I&O22.

Responses to the stand-alone questionnaire are prefixed I&OQ22.

You can find out more about using the consultation portal in our guidance notes.

Monitoring questions

Two optional monitoring questions were included in the consultation. This was to help us understand the reach of the consultation and inform future engagement activities.

Optional Monitoring Question	**Number of Responses**	**Yes**	**No**
OM1. Are you a resident within the Chelmsford City Council area?	65	44	21

If yes, please select the settlement which you live in or near	Number of Reps
Bicknacre	2
Boreham	4
Broomfield	0
Chatham Green	0
Chelmsford Urban Area	14
Danbury	2
Downham	0
East Hanningfield	0
Edney Common	0
Ford End	1
Galleywood	0
Good Easter	0
Great Leighs	1
Great Waltham	1
Highwood	0
Howe Green	0
Little Baddow	7
Little Waltham	0
Margaretting	0
Ramsden Heath	1
Rettendon Common	1
Rettendon Place	0
Roxwell	0
Runwell	0
Sandon	0

If yes, please select the settlement which you live in or near	Number of Reps
South Woodham Ferrers	5
Stock	0
West Hanningfield	0
Woodham Ferrers	1
Writtle	2
Other (including Great Baddow, Newlands Spring, out of CCC area representing client)	9

Optional Monitoring Question OM2 How did you hear about the consultation?	**Percentage**
CCC Website	20%
Social media	9%
Word of mouth	12%
Newspaper advert	2%
Parish Council website/newsletter	11%
Poster	0%
Attended a Local Plan exhibition	6%
Local Plan Newsletter	8%
Direct notification email/letter	26%
Other (including joint working, representing client)	6%

Section 3. Main Issues Raised in Consultation Responses

A brief overview of the content of each section of the consultation document is set out below. This is followed by a summary of the feedback received to each question. After that, two tables are provided which summarise firstly how the Preferred Options Local Plan has been informed by the plan evidence base and secondly the Issues and Options consultation responses. The full evidence base can be viewed at www.chelmsford.gov.uk/lp-review.

It is important to note that the report does not summarise all the representations received or identify every individual issue. It also does not provide a Chelmsford City Council (CCC) response to each individual comment.

Key statistics are included at the top of each section. Where relevant these include the number of yes/no responses to each question and the number of written comments received to each question.

Part 2 Context

This section of the consultation document sets out the background to the plan review including a summary of the changes that have happened since the Local Plan was adopted in 2020 and the key challenges and opportunities to address over the reviewed plan period to 2041.

Key statistics:

Question	Yes	No	Comments	Total number of responses
1. Do you agree with the challenges and opportunities identified for the review of the adopted Local Plan? If not, please explain why. Where possible, please support your answer with reference to any evidence.	51	15	64	130

Summary of Specific and DTC consultees comments:

- Agree with the challenges and opportunities identified (Braintree District Council, Mid and South Essex Integrated Care Board (ICB), Anglian Water Services Ltd, Essex County Council)
- Another challenge is securing enough water and sewerage provision in an area which is dry (Braintree District Council)
- Agree with the need to build stronger communities with community infrastructure and improved health and wellbeing outcomes (Mid and South Essex Integrated Care Board (ICB)
- Updated evidence base and a Water Cycle Study will help inform the spatial distribution of growth (Anglian Water Services Ltd)
- Welcome a whole life carbon assessment to inform the spatial distribution of development, including the infrastructure required to support it (Anglian Water Services Ltd)

- Supportive of policy targets relating to climate change and the effective and efficient use of water resources (Anglian Water Services Ltd)
- Support many of the aims including addressing the affordable housing crisis and economic change, increasing biodiversity, incorporating sustainable and active travel and improving health and wellbeing as these align with Essex County Council (ECC) Strategies (Essex County Council)
- Consider the future vision set out in the Government's Build Back Better High Streets (Essex County Council)
- Look at the impact of home working on existing office space in the city centre (Essex County Council).

Summary of General Consultees Comments:

- Support (Newland Spring Residents Association).

Summary of Developer/Landowner/Agent Comments:

- Support for the challenges and opportunities identified (Wates Developments Limited, Bellway Homes Ltd, Bellway Strategic, Richborough Estates, Chris Buckenham, The Bucknell Family, Bolton, S&D, Gray & Sons, Dandara Eastern, Mr Alexander Micklem, Grosvenor Property UK and Hammonds Estates LLP, Cliffords Group and Mr Mark Peters, Pigeon (Sandon) Ltd, Dandara, Dominvs Group, Taylor Wimpey)
- National Planning Policy Framework (NPPF) encourages policies and vision to look at the next 30 years so the Local Plan and Vision should look beyond 2041 (Chris Buckenham, Mr Alexander Micklem)
- Development should be sited in the most sustainable locations particularly in respect of access to major roads, public transport, walking/cycle links, local facilities and green infrastructure (Wates Developments Limited, Bellway Strategic, Bolton, S&D)
- Development should take advantage of the forthcoming infrastructure being delivered as part of the current Local Plan (Wates Developments Limited)
- Encourage growth across all sustainable settlements which would support existing services and facilities in those locations (Dandara Eastern)
- Important to encourage development in rural villages and communities so that they do not stagnate or decline (Croudace Homes)
- Should develop brownfield sites (London & Cambridge Properties Limited)
- Opportunity for large developments which straddle the boundary of neighbouring authorities (Richborough Estates)
- There should be an increased emphasis since the pandemic on growing a strong local economy and employment opportunities (The Bucknell Family, Gray & Sons, Pigeon (Sandon) Ltd)
- Plan should be flexible and be able to react to changes in economic conditions and growth in different employment sectors (Pigeon (Sandon) Ltd)
- Welcome the attention on the future role of the city centre (Dominvs Group)
- There are opportunities to integrate development into existing and planned green and blue infrastructure (Obsidian Strategic Asset Management Ltd)
- Development provides the opportunity to enhance habitats and provide biodiversity net gain (BNG) (Obsidian Strategic Asset Management Ltd)

- Need to consider the impact of flooding on the city centre presented by climate change (Vistry Group)
- There are opportunities for enabling development to facilitate key infrastructure which could alleviate the flood risk (Vistry Group)
- More assessment is needed about how the Council will provide Specialist Residential Accommodation (Mrs Mary Rance, Inspired Villages).

Summary of Public Comments:

- Agreement with the challenges and opportunities identified
- Support emphasis on the climate and ecological emergency
- Concerns about the extra housing numbers required which is not in line with addressing climate change and could have a negative impact on wildlife and countryside
- Current infrastructure cannot cope including roads such as the A12
- Need to acknowledge the energy crisis
- Affordable homes need to be affordable
- Build quality should exceed building regulations requirement
- Should be less focus on cycle ways
- London and airports need to be more accessible by road
- Add provision for social activities/facilities for young people
- Securing enough finance is a challenge/constraint
- Identify efficiency savings as a challenge or opportunity
- Growth is an opportunity to improve services and reduce costs
- Not enough emphasis on retaining linked up woodland and countryside to other services and infrastructure severing parts of the countryside
- Need to increase focus on improving biodiversity
- Need to build the infrastructure for the current population and projected growth first
- Concerns over the increase in traffic on health and wellbeing
- Development should be located where transport links and infrastructure are already in place and not in locations physically disconnected from Chelmsford.

Our evidence says
The Preferred Options Local Plan has been informed and supported by a number of evidence base studies including the Preferred Options Integrated Impact Assessment (IIA), Employment Land Review 2023, Water Cycle Studies 2024 and Strategic Flood Risk Assessments 2024. The evidence base assists in identifying the challenges and opportunities for the plan such as opportunities for investment in infrastructure, economic growth, environmental benefits and access to services when identifying suitable locations for development.
The Preferred Options IIA 2024 considers that the preferred Spatial Strategy will focus new housing and employment growth to the most sustainable locations when considered against national planning policy, analysis of responses to the I&O, environmental constraints, discussions with key stakeholders, availability/viability of land, the settlement hierarchy, and draft Vision/Spatial Principles. It also finds that many of the policies within the Preferred Options Local Plan would have positive impacts when assessed against the SA objectives. It is

Our evidence says
not considered proportionate or necessary to undertake a carbon impact assessment in addition to the IIA (and there is also no requirement to undertake this). The Local Plan and the IIA are considered to be in accordance with guidance on carbon impact assessment.

The Preferred Options Local Plan
New policy requirements for biodiversity net gain have been added within the Preferred Options Local Plan including to Policy DM16 (Protection and Promotion of Ecology, Nature and Biodiversity).
The Spatial Strategy has been tested against a number of factors including transport impact and infrastructure requirements.
There is improved climate change resilience within the Local Plan including references to delivering net-zero carbon emissions (DM31 Net Zero Carbon Development (In operation), integrated and stand-alone renewable energy generation (Strategic Priority 1) and rainwater harvesting (DM25 Sustainable Buildings).
Strategic Priorities have been amended and new priorities added within the Preferred Options Local Plan - more details are provided in the responses to Q3.
The Preferred Spatial Strategy includes a variety of small sites, brownfield sites and larger greenfield sites – more details are provided in the responses to Q62.

Part 3 Vision

This section of the consultation document proposes a high-level Vision setting out what is important for Chelmsford and how change will be managed in the future.

Key statistics:

Question	Yes	No	Comments	Total number of responses
2. Do you agree with the proposed new Vision? If not please give the reasons for your answer.	37	24	53	114

Summary of Specific and DTC consultees comments:

- Support for the proposed Vision (Basildon Borough Council, Essex County Council, Braintree District Council, Rochford District Council, Sandon Parish Council, Broomfield Parish Council)
- Is clear, has ambition and translates well through the plan policies (Uttlesford District Council)
- Aligns with the County's plan for levelling up the County 2021-2025 - Everyone's Essex (Essex County Council)
- Add in 'healthier' in line with other council strategies and to better reflect Section 8 of the NPPF (Sport England)
- Add in 'healthier' and consider adding in 'sustainable' (Mid and South Essex Integrated Care Board (ICB)

- Should be more outward looking and reflect that Chelmsford is a city which acts as an important centre within the region (Braintree District Council)
- Recommend the plan includes greater clarity and certainty on what the vision means through a detailed suite of Strategic Priorities and/or objectives (Rochford District Council)
- Is concise, but should provide a clearer direction which embeds the Strategic Priorities and addresses the climate and ecological emergency (Anglian Water Services Ltd)
- Says very little and is too Chelmsford focused; it should refer to South Woodham Ferrers and the surrounding villages (South Woodham Ferrers Town Council)
- Amend to 'Guiding Chelmsford's adaptation and growth.....' to give a focus on preserving and improving what already exists (Great Waltham Parish Council)
- Support a Vision that amongst other matters will improve the most deprived communities, focus new development in areas with infrastructure investment and protect the highest quality agricultural land (Chignal Parish Council).

Summary of General Consultees Comments:

- Support for the proposed Vision (Newlands Spring Residents Association, North West Parishes Group)
- Making the best use of existing and planned transport infrastructure will be critical to achieving the new Vision (North West Parishes Group)
- Too short, vague and unmeasurable; a better Vision would be 'To lead our County as the Capital of Essex, making Chelmsford a greener, fairer and more connected community, fusing beautiful Countryside and thriving agriculture, with our vibrant and prosperous Green city.' (Save Sandford Mill Campaign).

Summary of Developer/Landowner/Agent Comments:

- Support/agreement for the proposed Vision - comments include it is more concise, aspirational and achievable (Taylor Wimpey, Grosvenor Property UK and Hammonds Estates LLP, London & Cambridge Properties Limited, Stonebond Properties (Chelmsford) Ltd, Dandara, Dandara Eastern, W & H Marriage & Sons Limited, Writtle University College)
- Welcome that it is more applicable to the entire Chelmsford City Council plan area (Dandara, Dandara Eastern)
- It should reflect the adopted Local Plan Vision which is clearer and more comprehensive (Pembridge Land Group, Vistry Group, Chelmsford Garden Community Consortium)
- Adopted Local Plan better reflects Chelmsford's role as a key centre (Pembridge Land Group, Rosehart Properties Ltd)
- Inadequate e.g. too brief, meaningless, lacks detail, not measurable (Rosehart Properties Ltd, Bellway Strategic, Bellway Homes Ltd, Wates Developments Limited, Edward Gittins Associates, Pembridge Land Group, Vistry Group, Richborough Estates, Hill Residential Ltd)
- Poorly reflects the proposed Strategic Priorities (Rosehart Properties Ltd, Pembridge Land Group, Wates Developments Limited)

- Not underpinned by relevant and up-to-date evidence (Bellway Strategic, Bellway Homes Ltd, Richborough Estates)
- Inconsistent/contrary to the NPPF (Bellway Strategic, Bellway Homes Ltd, Richborough Estates, Greystoke GB)
- Should acknowledge that development needs are to be met in full over the plan period (Richborough Estates)
- Expand to include 'more sustainable' to better reflect the NPPF and put sustainability at the heart of the plan (Croudace Homes)
- The Vision should refer to other settlements, not just Chelmsford City itself (Obsidian Strategic Asset Management Ltd, Hill Residential Ltd)
- Add to end of Vision '…through locally agreed Strategic Priorities.' (Wates Developments Limited)
- Alternative wording suggested to focus on making the whole Plan area more self-contained and sustainable and not simply concerned with future growth (Edward Gittins Associates)
- Various comments suggesting that their proposed development sites will accord with the proposed Vision.

Summary of Public Comments:

- Both support and disagreement for the proposed Vision
- Some support expressed for retaining/updating the adopted Local Plan Vision
- Use of 'fairer' is unclear and subjective
- 'Connected Communities' implies cars are bad but public transport is not always feasible or affordable
- Should be greater emphasis on retaining natural environments and the countryside
- Vague, meaningless and not supported by evidence
- Unclear if deliverable and what will be achieved by 2041
- Support improvements/regeneration of the city centre/town centres
- Support development of brownfield land over greenfield land
- Support economic development, jobs growth and inward investment
- Support high quality homes
- Support green initiatives and biodiversity
- No mention of the requirement to improvement council efficiency and effectiveness.

Our evidence says
The supporting text reflects the local priorities in the Council's corporate plan Our Chelmsford, Our Plan.
National Policy - The NPPF requires that plans provide a positive vision for the future of their area (Paragraph 15).

The Preferred Options Local Plan
The revised Vision is unchanged from the Issues and Options Consultation Document as it continues to be consistent with the simplified approach.

The Preferred Options Local Plan
The Issues and Options Plan did not contain the expanded supporting text which now appears in the Preferred Options Local Plan. This covers many of the topics raised by consultees, within its supporting bullet points, including reference to South Woodham Ferrers, the regional economy, and climate change. Added emphasis has been given to sustainable and active travel, healthy living environments and economic growth.

Part 4 Our Strategic Priorities

This section of the consultation document considers the Strategic Priorities which are the key priorities that the Local Plan is based on.

Key statistics:

Question	Yes	No	Comments	Total number of responses
3. Do you agree with the proposed updates to the Strategic Priorities? If not please give the reason for your answer.	68	26	104	198

Summary responses are listed under the Strategic Priority they relate to, followed by other comment for each consultee group. The abbreviations in the sub-headings below relate to the Strategic Priorities as follows:

SP1	Strategic Priority 1	Addressing the Climate and Ecological Emergency
SP2	Strategic Priority 2	Promoting smart, active travel and sustainable transport
SP3	Strategic Priority 3	Protecting and enhancing the natural and historic environment, and support for an increase in biodiversity and ecological networks
SP4	Strategic Priority 4	Ensuring sustainable patterns of development and protecting the Green Belt
SP5	Strategic Priority 5	Meeting the needs for new homes
SP6	Strategic Priority 6	Fostering growth and investment and providing new jobs
SP7	Strategic Priority 7	Creating well designed and attractive places, and promoting the health and social wellbeing of communities
SP8	Strategic Priority 8	Delivering new and improved infrastructure to support growth
SP9	Strategic Priority 9	Encouraging resilience in retail, leisure, commercial and cultural development

Summary of Specific and DTC consultees comments:

- Support for the draft Strategic Priorities (Essex County Council, Natural England, Basildon Borough Council, Rochford District Council, Brentwood

Borough Council, Anglian Water Services, Essex Police Fire and Crime Commissioner, Mid and South Essex Integrated Care Board (ICB), Sport England, South Woodham Ferrers Town Council, Newlands Spring Residents Association, East of England Ambulance Service NHS Trust.

SP1

- Recommend an additional bullet to cover a positive strategy for renewable energy generation which maximises the on site integration of renewable energy and standalone renewable energy development in suitable areas, and to refer to recent energy report (Essex County Council)
- Alternative wording suggested to deliver 'net zero carbon emissions' rather than 'move towards', to address the 2025 target for net zero (Essex County Council)
- Recommend exploring the need for new surface water infrastructure, to avoid development surface water run off to combined sewers, which Sustainable Drainage Systems (SuDS) principles do not support (Essex County Council)
- Particular support for moving towards net zero carbon emissions, and removing surface water from the water recycling network through SuDS (Anglian Water Services Ltd)
- Alternative wording suggested, to include avoiding development in areas of flood risk where possible (Environment Agency)
- The commitment to net zero should be stronger, to deliver net zero, rather than move towards it (South Woodham Ferrers Town Council)
- Supported, but reference to the provision of renewable energy schemes could be added (Braintree District Council)
- A shared challenge is access to water supply and the need to work with water companies to align growth to funding. Respect for the cross-border diminution of the aquifer sources and the fragility of related ecology is an imperative arising from both councils' focus on climate and ecological emergency (Uttlesford District Council).

SP1 and SP2

- Welcomed as they reflect a greater focus on the impacts of climate change; the implications of development for the natural environment; and the objective to secure environmental gains within developments (Natural England)
- Welcomed as new Strategic Priorities (Mid and South Essex Integrated Care Board (ICB).

SP2

- Support the principle of multi-functional greenways for sustainable and active travel and to contribute to health and wellbeing (Essex County Council)
- Support the proposed requirement for renewable energy in development schemes, to provide consistency across adjoining authorities. Encourage CCC to seek the highest standards beyond building regulations (Uttlesford District Council).

SP3

- This should be informed by more up to date evidence on green infrastructure prepared by ECC (Essex County Council)

- Support an increase in biodiversity and ecological networks; Anglian Water has set a framework to lead in protecting and revitalising rivers, including creation the of new habitats (Anglian Water Services Ltd)
- This should be extended to minimise the loss of all agricultural land (South Woodham Ferrers Town Council)
- The available maps do not distinguish between 3a and 3b agricultural land, so it is difficult to judge the impact of this priority (Braintree District Council)
- Welcome additions to this priority. These changes reflect a greater focus on the impacts of climate change; the implications of development for the natural environment; and the objective to secure environmental gains within developments (Natural England)
- Propose adding an objective to minimise the loss of the best and most versatile agricultural land to ensure future food production (Chignal Parish Council)
- Support - small scale mobility hubs might work in the rural areas, and the planning implications of the increasing use of drones for delivery should be considered where they could help to mitigate vehicular movements and emissions, but also bring a host of issues around their storage, charging/fuelling, potential nuisance etc (Uttlesford District Council).

SP4

- Support development of previously developed land provided any land or contribution towards additional education need is met by the developer (Essex County Council)
- Developments or site allocations that are unsustainable in school transport terms will be resisted (Essex County Council)
- Seeking clarification of inappropriate development in relation to Green Belt proposals. Green Belt wording appears to have been removed from parts of the document (Galleywood Parish Council)
- Do not agree that using the settlement hierarchy will lead to the most sustainable development locations (Broomfield Parish Council)
- Protecting the Green Belt is not connected with sustainable development patterns and rules out some sustainable locations. It would be better placed in the priorities for Place group (Broomfield Parish Council)
- Protection of soil quality should also be a consideration, and developers should be encouraged to have a proactive approach to stewardship, to work with adjoining farm and estate managers on sustainable land management on land adjoining and within new development, especially for sustainable drainage control and biodiversity (Uttlesford District Council).

SP5

- CCC should engage with ECC on additional evidence on the requirements and needs for specialist and supported housing for vulnerable adults (Essex County Council)
- Support for meeting the need for new homes, although if insufficient sites are identified elsewhere the extent of the Green Belt may need to be reviewed (Braintree District Council)
- The list should also include hostels for the homeless. There should also be enforcement action to bring empty properties into occupation, alongside constructing new homes (Great Waltham Parish Council)

- Suggest collaborating on how the 20% biodiversity net gain (BNG) can be viably secured in policy and made effective by onward monitoring (Uttlesford District Council)
- Suggest inclusion of countryside protection zones around sensitive settlement locations where environmental quality is high, particularly the expansion of existing allocated sites. This is encouraged particularly approaching the Uttlesford border to help channel pressure for development in the rural areas and around Great Dunmow (Uttlesford District Council).

SP6

- A focus could be given to enhancing green skills in all jobs and sectors, including increased support for training (Essex County Council).

SP7

- Large scale employment sites could also be subject to Health Impact Assessment where appropriate (Essex County Council)
- Stewardship arrangements should go beyond management and maintenance of open spaces, and links with ECC service delivery should be explored (Essex County Council)
- Welcome the priority to encourage development to be future proofed so new homes that are sustainable and resilient to the impacts of climate change; and suggest that this priority is amended to ensure developments are water efficient as well as energy efficient (Anglian Water Services Ltd)
- The objectives should also reference education alongside health services (Great Waltham Parish Council).

SP8

- Agree with the need to address the long-term infrastructure needs for the city. Anglian Water plans and strategies aim to address the long-term needs over a 25-year time horizon. The Chelmsford Water Recycling Centre, which has a large catchment area encompassing the city and its environs, has a long-term strategy to 2050 of process optimisation and increased capacity, based on projected population growth in the catchment area (Anglian Water Services Ltd)
- Wording for provision of 'helps new primary health services' should be stronger (Galleywood Parish Council)
- Greater recognition should be given to the East of England Ambulance Service NHS Trust as an essential social infrastructure provider and emergency service (East of England Ambulance Service NHS Trust).

SP9

- Concern that increased use of permitted development rights will lead to a reduction in design quality, and reduce potential for mitigation measures and developer contributions, particularly in relation to education (Essex County Council)
- A recognition could be included that changes in city centre retail mean that regeneration is no longer a sound strategy (Great Waltham Parish Council).

Other comments

- Anglian Water's strategic direction is to address challenges of climate change, population and economic growth, and to protect the environment (Anglian Water)
- More detailed objectives with clear targets would be welcomed as the review progresses to ensure clarity over the level of ambition (Rochford District Council)
- The title Priorities for Climate should be changed to Priorities for Climate and the Environment, to reflect the broader remit, e.g. including landscape (Broomfield Parish Council).

Summary of General Consultees Comments:

SP7

- Should also consider ensuring that new development helps provide new/enhanced sports facilities and opportunities for physical activity as they are as important as primary health services in promoting the health and social wellbeing of communities (Sport England).

Other comments

- Grouping the Strategic Priorities into themes distorts the wording. Some aspects appear not to fit with the overall theme, and lack focus - additional text is needed. Should revert to an un-prioritised list. There may be additional themes of importance. Detailed notes are provided for a suggested rewrite and reorganisation of this section (Save Sandford Mill Campaign).

Summary of Developer/Landowner/Agent Comments:

- Agree with the draft Strategic Priorities (Rosehart Properties Ltd, Taylor Wimpey, Martin Grant Homes, London and Cambridge Properties Ltd, Pembridge Land Group, Vistry Group, Wates Development Limited, Dominvs Group, Obsidian Strategic Asset Management Ltd, Dandara, Dandara Eastern, Gray & Sons, Grosvenor Property UK and Hammonds Estates LLP, Redrow Homes and Speakman Family, Marden Homes Ltd, Sempra Homes Ltd, Mr A Smith, Stonebond (Chelmsford) Ltd, Bloor Homes Eastern, A.G & P.W.H Speakman, Chris Buckenham, Cliffords Group Ltd, David Lloyd Leisure and Aquila Development Ltd, The Bucknell Family, Cliffords Group and Mr Mark Peters, Hill Farm (Chelmsford) Ltd, C J H Farming Ltd, Pigeon (Sandon) Ltd, Writtle University College).

SP1

- New residential development should be focused on Chelmsford Urban Area and adjoining land (Martin Grant Homes)
- Suggest addition of a further bullet point covering the need to ensure that new development be delivered in the most suitable and sustainable locations to assist with mitigating the impacts of climate change, through providing development opportunities that allow existing communities to continue to grow and support the growing population (Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern) Ltd, Martin Grant Homes)
- Support this, and suggest the Council should support opportunities to promote tree planting as part of a robust environmental strategy (Cliffords Group Ltd)

- Suggest this draws greater reference to the positive relationship between strong, local economic growth and sustainability / climate change benefits; suggest an additional bullet point promoting the benefits of economic growth, local jobs and travel and sustainable lifestyles (Pigeon (Sandon) Ltd)
- Should clarify that one Strategic Priority does not take precedence over another but that they are used mutually (Bellway Homes Ltd).

SP2

- Agree with this priority, however it is important that the housing need is properly calculated (London and Cambridge Properties Limited)
- Support the intention to address the housing demand and supply, however viability challenges should be considered, given the current economic environment (L & Q)
- Would encourage the inclusion of opportunities to locate new economic development close to the existing road network, such as the A12 at Margaretting. The locational requirements of different sectors should be recognised and addressed (Gray & Sons)
- This should also seek to encourage the distribution of development towards planned strategic infrastructure, for example the Chelmsford Northeast Bypass route and the opportunities this unlocks (Cliffords Group Ltd)
- Suggest adding a further bullet that recognises that development requiring road movements (e.g. logistics/distribution) should be located close to the strategic road network to reduce impact on local roads and communities (Pigeon (Sandon) Ltd).

SP3

- It is imperative that employment and the economy is supported in other settlements as well as Chelmsford (Obsidian Strategic Asset Management Ltd)
- Areas of low ecological and biodiversity value, including within the Green Wedge, may be better utilised for alternative development which should be sought through the Local Plan (The Bucknell Family)
- This fails to take into account the recommendations and commitments within the Chelmsford Economic Strategy and does not include or recognise the role of education providers, such as Writtle University College (WUC). WUC is an important local employer, anticipated to increase as a result of the implementation of a new Strategic Plan to 2030 (Writtle University College).

SP4

- Particularly support the focusing of previously developed land in the Chelmsford Urban Area (Essex Police Fire and Crime Commissioner)
- Urge review of Green Belt to avoid distorted settlement growth pattern (Rosehart Properties)
- There should be an appropriate review of the Green Belt to identify suitable development locations and avoid a distorted settlement growth pattern (Rosehart Properties, Pembridge Land Group, Martin Grant Homes, Dandara, Taylor Wimpey Strategic Land)
- The Council should take full account of sustainable development opportunities on the edge of the city, even if they are in the Green Belt – to realise key infrastructure and provision of housing close to where the need arises, close

to key services and sustainable travel options (Vistry Group); and for economic growth (Gray & Sons); and to achieve sustainable development across the plan area (Hill Residential Ltd)

- Should seek the sustainable distribution of development across Chelmsford utilising strategic road infrastructure (Cliffords Group Ltd)
- Suggest including further emphasis on the need to support rural communities through the provision of sympathetic small scale residential development, to allow villages to grow and thrive to support local services (Cliffords Group Ltd)
- Minerals, waste and marine plans already form part of the development plan and do not need further reference. Minerals safeguarding designation should not been seen as a constraint, but can be extracted and used as part of future development (Martin Grant Homes, Stonebond (Chelmsford) Ltd)
- An additional priority for growth should be added to pursue opportunities to enhance the sustainability of existing settlements, and identify opportunities for villages to grow and thrive, especially where this will support local services (Croudace Homes)
- Strongly supported, however this could be improved through clarification that the Council will plan positively to meet the objectively assessed needs (Bellway Strategic, Bellway Homes Ltd, Gleeson Land)
- Would issue caution against over reliance on the Settlement Hierarchy, and recommend a flexible approach to the location of housing (H R Philpot & Sons, Chris Buckenham).

SP5

- This should go further and specifically identify groups that fall into the term specialist, e.g. older people's housing. The population of older people will increase by 2043 (The Planning Bureau)
- This would benefit from clarification of specific groups and their specific housing requirements; and also, could refer to the imperative to secure an appropriate housing mix which includes affordable housing provision (Bellway Strategic, Bellway Homes Ltd); and older people's housing (The Planning Bureau, Inspired Villages)
- Affordability of housing merits an additional bullet point to address the worsening affordability of homes in the Chelmsford area (Tritton Farming Partnership, Mr and Mrs Richard and Sally Speakman, Medical Services Danbury, Marden Homes Ltd, Crest Nicholson, Sempra Homes Ltd)
- This should refer to the importance of rural communities, and the need to promote sustainable development in these areas where it will enhance or maintain their vitality (Mr and Mrs Richard and Sally Speakman)
- Suggest an additional bullet to clarify that evidence documents will continue to be prepared across the Plan period, which development should accord with (e.g. on dwelling mix, affordable tenure, need etc) (Bellway Homes Ltd)
- Agree that housing delivery is strongly related to economic growth and will inform the economic strategy of the new Local Plan (Gray & Sons).

SP6

- To be fully effective, a review of the Green Belt is required (Rosehart Properties, Pembridge Land Group)
- Suggest amending third bullet to reference local and wider strategic needs (Greystoke CB)

- Support, and consider this will help to maintain and diversify the supply and choice of employment provision in both the urban and rural areas of Chelmsford (Hylands Construction Company Ltd, C J H Farming Ltd)
- Suggest expanding this to include the rural economy and the scope to support and promote small-scale rural business appropriate to the countryside (Cliffords Group Ltd); and to help further maintain and diversify the supply and choice of employment provision in both the urban and rural areas of Chelmsford (Hill Farm (Chelmsford) Ltd)
- This should recognise that some flexibility is required, where employment land is shown to be surplus to requirements, some current policies are out of date (Bellway Homes Ltd).

SP7

- 'Strategic scale developments' should be defined to provide clarity on the scale of development where masterplans and design codes will be sought, which could then be captured in site allocation policies with some flexibility to allow removal of the need for a design code (Bellway Homes Ltd).

SP8

- This should include an aspiration to ensure that services and facilities are delivered where needed to support the creation of sustainable communities (Bellway Strategic)
- The new Local Plan should be supportive of the need to bring forward development to facilitate the delivery of social infrastructure, where it is sustainable and appropriate (Miscoe Enterprises Ltd)
- Support the recognition that the new Local Plan will promote opportunities for new sustainable infrastructure, however this priority could be strengthened to include explicit reference to green infrastructure, such as open space, recreational areas and leisure (Cliffords Group Ltd)
- This would benefit from recognising that other means exist to support the provision of new infrastructure including planning obligations and Community Infrastructure Levy receipts (Bellway Homes Ltd).

SP9

- This neglects the needs of smaller settlements to retain vital services. Modest housing growth should be supported in smaller settlements including those within the Green Belt (The Howgego Trust).

Other Comments

- Consider there is a mismatch between the Vision and the Strategic Priorities (Pembridge Land Group)
- Consider there is a missed opportunity to strengthen the relationships between SP2, SP4, SP5, SP6 and SP8. Priorities 2 and 8 should permeate throughout all of the Strategic Priorities, where relevant, as a means of recognising the importance of strategic road infrastructure to delivering sustainable new development. All the priorities should also promote the advantages of locating development close to existing strategic road infrastructure (Mr Alexander Micklem)
- SP7, SP8, SP9 are somewhat ambiguous and could be clarified. Design expectations should be related to Making Places SPD (Bellway Strategic)

- The priorities should remain flexible to avoid stifling development which may not fit with a specific priority but may be sustainable on balance (Gleeson Land)
- It is imperative that aspirations to secure net zero carbon development, are balanced against the city's need for growth. The Council should not be overly prescriptive but should support the uptake of low and zero-carbon technologies and protection of the best and most versatile agricultural land only where this is appropriate and justified (Bellway Strategic)
- Development being delivered as part of the North Chelmsford strategic allocation is expected to be supported by the required services to ensure sustainable development is achieved - land immediately adjacent could also be delivered in line with Strategic Priorities (Marden Homes Ltd, Mr A Smith)
- Suggest a greater emphasis is needed on further and higher education and its importance in helping to meet the skills needs of employers and industry (Writtle University College).

Summary of Public Comments:

SP1

- This should reflect that open, unmanicured grassland and arable land also support a range of flora and fauna not found in woodland
- Propose a text change – to identify and anticipate the impacts of climate change, instead of adapting to its consequences.

SP2

- Additional wording is proposed to include reference to the most efficient use of fossil and alternative fuelled vehicles.

SP3

- This should be stronger – to prohibit loss of best and most versatile agricultural land, rather than minimise – and farmland should be protected
- Should reflect that open, unmanicured grassland and arable land also support a range of flora and fauna not found in woodland
- Suggest this is split into two priorities - for natural environment and historic environment. There is a need to deliver on biodiversity net gain (BNG), based on local wildlife and plant surveys rather than theory.

SP4

- Previously developed land also exists in villages around Chelmsford, and some smaller settlements are also more sustainable than those where development is taking place
- Protection of the Green Belt is not supported, as at this stage not satisfied there are strong reasons to preserve the current Green Belt extent. Some land could be released to allow sustainable development
- This should go further to protect green open rural farmland as well.

SP5

- This should include social housing

- The Council should address the needs of existing Chelmsford residents as a priority, concern expressed about creating new communities at the expense of the older ones
- Local young people wishing to buy a home are routinely priced out of Chelmsford and have to buy miles away, cutting them off from their established social networks; the Council should look to how to remedy this.

SP6

- There should be a strong focus on jobs, with lower business rates for new independent companies, and also attract a large corporation.

SP7

- Spatial Approach E is incompatible with this Strategic Priority, as it builds on green field and does not reflect the settlement hierarchy, and therefore requires extensive infrastructure development
- This should make specific reference and provision for young people - social facilities such as Youth Zones. Although new, Beaulieu and Channels developments appear to lack such facilities
- Suggest adding build quality to the design objective
- Strengthen wording to make the specific point that 'isolated' developments are the least-favoured approach to development, as opposed to growing and adding on to existing developments/villages/towns.

SP8

- This should acknowledge smaller communities and those that border Chelmsford's area
- This should encourage a greener city, and stricter application of planning requirements.

SP9

- Chelmsford lacks the types of venues required for cultural events - e.g. multi purpose halls for exhibits of all kinds; designated gallery space; space for amateur dramatics and concerts. The Shire Hall is still empty and surely must be considered for repurposing for cultural use
- Needs to be amended to apply to Chelmsford area as a whole, not just the city centre.

Other comments

- Support the updated Strategic Priorities – they are stronger, clearer and better focused
- Delivery of infrastructure cannot be left to developers and is a consistent problem
- There is a mismatch between the predicted needs for Electric Vehicle (EV) charging and provision
- Concern that items from the adopted Local Plan cannot be achieved, such as upgrading the rail network, road improvements, health facilities
- Improvements to biodiversity need to work from a baseline of protecting current species and habitats. Sites should not be stripped of ecological value
- All Spatial Approaches must consider transport infrastructure, water, sewage and power supplies

- How can success be measured, very few measurable outcomes
- Sustainability should have a higher priority than other Strategic Priorities
- Money should be spent on improving housing in the city centre, on people who require help, and policing
- Disagree there is a climate emergency. Question the need for additional housing
- Recent development at Rettendon is accessed via the Green Belt; along with residential units at Hayes Country Park in the Green Belt
- The Strategic Housing and Employment Land Availability Assessment (SHELAA) mapping shows a number of sites in the Green Belt
- The A130 has no junction to Rettendon Common between Howe Green and Rettendon Turnpike, so it is doubtful whether this should be termed a main road corridor. Improvements to the A132/B1012 will be welcomed
- Little information given on how and when the required infrastructure would be provided
- The Green Belt should be protected from development
- 145 homes have already been allocated in Boreham under the Local Plan
- Growth should be close to the city centre to make use of highways networks and community links. The strategic approaches will conflict with the Strategic Priorities; agricultural land would be lost to Approach E; Approach E would remove trees rather than provide an increase in woodland expansion; Hammonds Farm has no infrastructure or sustainable transport.

Our evidence says
The Water Cycle Studies 2024 recommend rainwater harvesting for water re-use as set out in Policy DM25 (Sustainable Buildings). This policy also reflects Essex and Suffolk Water's latest draft Water Resources Management Plan 2024 and the emerging Essex County Council's Essex Water Strategy. Further recommendations in the reports will inform updates to the Making Places SPD and the Pre-Submission Local Plan.
Report 2: Essex Net Zero Policy, and the Essex Design Guide 2023, sets out design guidance and advice which underpins Policy DM31 (Net Zero Carbon Development (In operation)). This guidance has been developed through joint working between Essex Planning Officers Association, ECC and a number of Essex authorities, including Chelmsford City Council.
National Policy - The NPPF in Section 13 sets out Green Belt Policy, which is reflected in the Preferred Options Local Plan.
National Model Design Guide and Code – these set out the characteristics of well-designed places and demonstrate what good design means in practice. Regard has been had to the Guide and the Code, which will also be used to inform an update of the Making Places SPD.
The Preferred Options IIA 2024 considers that very few incompatibilities are identified. The Strategic Priorities are particularly compatible with the IIA objective of sustainable living and revitalisation, housing, the economy and transport, and also supportive of biodiversity, health and wellbeing, land use, cultural heritage and landscape. Any conflicts/uncertainties generally relate to the need to protect and enhance environmental assets and minimise resource use, waste and greenhouse gas emissions, when balanced against the priorities for growth.

Our evidence says
The Health Impact Assessment carried out as part of the IIA 2024 concludes that none of the policies are identified as having the potential to have significant negative effects on the HIA objectives.
The Council's Plan for Improving Rivers and Waterways 2022 (Item 7 on Agenda available via the link) contains a number of actions which underpin the Preferred Options Local Plan.
The Chelmsford Local Plan Viability Update 2023 supports a 20% biodiversity net gain on the two Garden Communities proposed within the Preferred Options Local Plan. It also sets out the reasoning behind the approach retain a requirement for a minimum of 10% biodiversity net gain, while feasibility for a higher amount is being explored on all other eligible developments.
The Chelmsford Local Plan Viability Update 2023 supports the new policy requirement for rainwater harvesting in updated Policy DM25 (Sustainable Buildings).

The Preferred Options Local Plan
Strategic Priority 1 – has been amended from the draft to include references to delivering net-zero carbon emissions, integrated and stand-alone renewable energy generation and water efficiency.
Strategic Priority 2 – references have been added to mobility hubs, accessibility, and multi-functional greenways.
Strategic Priority 4 – no review of the Green Belt is proposed; the Green Belt will continue to be protected from inappropriate development. It is considered that the purpose of the Green Belt is clear within the Preferred Options Local Plan, as set out in Strategic Priority 4 and Strategic Policy S1 (Spatial Principles).
Strategic Priority 6 – updates position including on employment levels, which are covered in more detail in Section 2 of the Preferred Options Local Plan.
Strategic Priority 7 – clarification is provided on the thresholds for Design Codes.
Strategic Priority 8 – emergency care has been added to other types of healthcare provision.
Strategic Priority 9 – reference is included to the Council's Plan for Improving Rivers and Waterways (Item 7 on Agenda available via the link).
Some suggested bullets are not covered in the Strategic Priorities due to the level of detail required, but are contained within the development management policies, including renewable energy generation in Policy DM19 (Renewable and Low Carbon Energy), Sustainable Drainage Systems in Policy DM18 (Flooding/SuDS), water efficiency in Policy DM25 (Sustainable Buildings), types of housing provision in Policy DM1 (Size and Type of Housing) and DM2 (Affordable Housing and Rural Exception Sites), and green infrastructure, open space and sports facilities in Strategic Policy S9 (Infrastructure Requirements).
The Preferred Options Local Plan seeks to minimise the loss of the best and most versatile agricultural land, which is balanced against sustainability and general suitability of a location for development. High quality green infrastructure will be provided on greenfield sites to protect, enhance and create wildlife corridors and ecological connectivity.
Stewardship is a requirement of the two garden communities within the Preferred Options Local Plan, at Strategic Growth Site Policy 6 (North East Chelmsford – Chelmsford Garden Community) and Strategic Growth Site 16a (East Chelmsford

The Preferred Options Local Plan
Garden Community (Hammonds Farm)); and within all strategic scale development (100 or more homes) as set out in Strategic Policy S14 (Health and Wellbeing).
The requirement to deliver 20% biodiversity net gain is a requirement of the new Garden Communities (Strategic Growth Site Policy 6 North East Chelmsford – Chelmsford Garden Community and Strategic Growth Site 16a East Chelmsford Garden Community Hammonds Farm).
The requirement to deliver biodiversity net gain is currently remaining at a minimum of 10% increase in biodiversity for all other eligible developments to ensure it is deliverable.
HIA is required for large employment sites, as set out in Strategic Policy S14 (Health and Wellbeing).
Tree planting is a priority for the Council, and additional policy requirements have been added to Policy DM17 (Trees, Woodland and Landscape Features).
Locational issues are addressed by the Spatial Principles in relation to, for example, an approach to site development along transport corridors, or for small scale development in villages.

Key statistics:

Question	Yes	No	Comments	Total number of responses
4. Are there any Strategic Priorities you think should be added?	N/A	N/A	37	37

Summary of Specific and DTC consultees comments:

- Heritage at Risk (HAR) - heritage assets that are a risk as a result of neglect, decay, damage or inappropriate development, or are vulnerable to becoming so. Chelmsford has three on the national Register, but we would encourage consideration of creating and managing a local HAR Register. Further detail is provided on options for policy approaches (Historic England)
- Encouragement of more diverse and sustainable agriculture – more agricultural land is needed to increase self-reliance and cut food miles to achieve climate goals (South Woodham Ferrers Town Council)
- Every house should have solar power, water harvesting etc – for all house building whether individual or large developments (Sandon Parish Council)
- The role of waterways (including the River Crouch) to address the challenges of coastal communities (Rochford District Council)
- The importance of protected habitat sites and heritage assets (Rochford District Council)
- Consideration of complete communities or 20 minute neighbourhoods to address spatial differences in infrastructure provision and life outcomes (Rochford District Council)
- Priorities for cross boundary planning, including for infrastructure (Rochford District Council)

- Scope to take action on empty homes, thereby reducing the number of homes needing to be built using the powers and incentives which exist (Great Waltham Parish Council)
- Greater protection for the Green Belt and other areas of special designation (Writtle Parish Council).

Summary of General Consultees Comments:

- A Strategic Priority specifically related to flood risk (Save Sandford Mill Campaign)
- A need to work with relevant third parties in the assessment of planning matters - dismissing these parties as "special interest groups" and not consulting with them directly is short sighted and deeply flawed (Essex Badger Protection Group).

Summary of Developer/Landowner/Agent Comments:

- The vital role of Chelmsford as the Capital of Essex. It is important to recognise the legacy of Chelmsford as a hub of the electronics, communications, defence and other innovatory industries and that current and new investment in these sectors should be strongly encouraged and not lost to competing locations outside Chelmsford (Rosehart Properties)
- Promote and encourage the Circular Economy by making best use of what already exists and recycling land and buildings to meet future needs and regenerate nature (Rosehart Properties, Pembridge Land Group)
- Make the maximum use of brownfield land for new development (London and Cambridge Properties Ltd)
- Ensure the vitality and viability of other settlements within Chelmsford, to enable them to grow and support the retention of existing services, including sensitively selected Green Belt release (Obsidian Strategic Asset Management).

Summary of Public Comments:

- Water should feature – a range of measures suggested including new reservoirs, expanding treatment works, protecting rivers, improving river health
- Commitment to funds and plans, and clear priorities to achieve all transport infrastructure (not just road), water, sewage and power supplies; Community Infrastructure Levy (CIL) will not cover the costs
- More emphasis needs to be put on protecting the natural environment which is already under great stress
- Promote development of previously developed land in Chelmsford Urban Area and in/around village settlements including sustainable smaller settlements
- Maintaining the essence of Chelmsford as a city surrounded by villages
- Improving air quality
- Protecting food security by maintaining farmland.

Our evidence says
The Preferred Options Local Plan has been informed and supported by a number of evidence base studies including the Preferred Options Strategic Housing Needs Assessment (SHNA), Employment Land Review 2023, Water Cycle Studies 2024 and Strategic Flood Risk Assessments 2024. The evidence base has assisted in developing the Strategic Priorities in the Preferred Options Local Plan.

The Preferred Options Local Plan
No additional Strategic Priorities are considered necessary, as the amended versions cover the detailed topics raised in a broader sense, with the detail reserved for development management policies.

Part 5 Delivering the updated Vision and Spatial Principles

This section of the consultation document takes each of the updated Strategic Priorities and describes how they are addressed through policies in the adopted Local Plan and other council planning documents. It then sets out ideas for proposed policy changes and new policies.

Strategic Priorities for Climate

1 Addressing the Climate and Ecological Emergency

Key statistics:

Question	Yes	No	Comments	Total number of responses
5. Do you support the approach being taken? If you disagree, please explain why.	39	11	40	90
6. What are your views on the Council's current climate change and flood risk local planning policies and the decisions they lead to?	N/A	N/A	38	38
7. What are your views on the subject areas identified for new policies or significant changes to existing policy?	N/A	N/A	52	52
8. Have we missed anything? Where possible, please support your answer with reference to any evidence.	N/A	N/A	32	32

Summary of Specific and DTC consultees comments:

- Support the strategic objectives related to the achievement of net zero development, enhanced tree planting and 20% biodiversity net gain (BNG) (Environment Agency, Castle Point Borough Council)
- Support this strategic priority but it is not clear how any of the sub-heading priorities in para 5.10 will address the “ecological emergency” (Natural England)
- Support reviewing the policies so that they more effectively address issues associated with climate change (Braintree District Council, Anglian Water)
- Supports the plan addressing climate issues but that the issue should be given weight within each of the other priorities, as opposed to being a standalone and definable priority in its own right (Rochford District Council)
- The role of Chelmsford as a regional centre for employment, retail and leisure should be secured sustainably through appropriate investment in lowering the carbon intensity of regional transport links (Rochford District Council)
- Consider a policy requirement for major development proposals to be informed by whole life cycle carbon assessments to support positive outcomes that align with the proposed strategic priorities (Anglian Water Services Ltd)
- Support the new ‘Strategic Priorities for Climate’ as these are largely consistent with the aims of the independent Essex Climate Action Commission (ECAC) and the ECC Safer Greener, Healthier Communities campaign (Essex County Council)
- ECC offer support to CCC in developing policies that deliver true net zero carbon development in operation and also address embodied carbon emissions (Essex County Council)
- Central Government need to lay out a more detailed roadmap and provide the legislation to back it up rather than rely on individuals to make more sustainable choices (South Woodham Ferrers Town Council)
- Do not believe the proposed responsibility should be passed onto Parish Councils, as set out in para 5.6 (Galleywood Parish Council)
- Welcome the reference to Parishes in para 5.6 and are keen to contribute to addressing the climate and ecological emergency (Broomfield Parish Council, Chignal Parish Council)
- Policy DM18 – Flooding/SuDS should be reviewed against the recently updated Planning Practice Guidance (PPG) - Flood Risk and Coastal Change (August 2022) (Essex County Council)
- Support for setting a framework to reduce water use and promote water re-use, reflecting the emerging Essex Water Strategy (EWS) is supported. Recommend consideration is given to the Water Resources Regional Plan being prepared by Water Resources East (WRE) (Essex County Council, Anglian Water Services Ltd)
- All water company areas in East Anglia have been determined as water stressed. Therefore, Local Planning Authorities (LPAs) should require all developments to adopt the optional minimum building standard of 110 litres per person per day. There should also be an ambition to further reduce the per person per day consumption within new developments e.g. consider setting standards for water consumption of individual components, such as toilets/showers (Environment Agency)

- Assessment and mitigation of risk to the water environment generated by increased wastewater flows requiring treatment should be included in the infrastructure or the natural environment section (Environment Agency)
- Agree with the approach but would like a greater emphasis on climate change and flood risk in local planning policies and decisions (Writtle Parish Council)
- The Local Plan should make explicit mention of projected seawater rise and the need to ensure appropriate flood defences are in place for the town (South Woodham Ferrers Town Council)
- Measures to retrofit existing buildings should be considered (Broomfield Parish Council)
- There needs to be careful thought given to tree management and positioning regarding street lined trees and their compatibility with the highway and other surroundings (Essex County Council, Great Waltham Parish Council, South Woodham Ferrers Town Council)
- It is important to protect the best agricultural land in order to maintain sustainable food supply chains (Broomfield Parish Council, Chignal Parish Council)
- The protection of Green Wedges can hamper cycle and walking routes being achieved. It is suggested that Compulsory Purchase Orders could be used to assist in completing infrastructure projects such cycle lanes within a shorter timescale (Broomfield Parish Council)
- ECC is keen to work collaboratively with CCC on a countywide assessment to identify potential areas of land which could be suitable for solar and wind schemes and how it might be used to feed into the next iteration of the Local Plan and the SHELAA process (Essex County Council)
- Community scale renewables should be required by all developments in para 5.10 and should also include refence to battery energy storage systems (Great Waltham Parish Council)
- Prefer a requirement for all new development to include climate-friendly features (e.g. PV panels and small scale turbines) rather than large sites for renewable energy generation (Broomfield Parish Council)
- Land should be allocated to recycling materials and re-processing plants (Great Waltham Parish Council)
- Policies need to be reviewed to deal with the impact on the historic environment (Writtle Parish Council).

Summary of General Consultees Comments:

- Support for the approach set out (Newlands Spring Residents Association)
- Active travel should be embedded into the policies that address climate change as it forms part of the policy response to climate change rather than being a separate planning matter (Sport England)
- A line should be drawn under habitat loss first and then consider other options for enhancement (Essex Badger Protection Group)
- Obtaining 20% BNG may often not be achievable and may impact on viability (L&Q)
- It is important to protect the best agricultural land in order to maintain sustainable food supply chains (North West Parishes Group)
- Agree with the suggestions but question how old planning permissions will be addressed to meet these requirements as well as a gap between current

building regulations and likely Future Homes requirements that needs to be considered (CHP)
- The PPG reflects that building regulations are the mechanism through which energy efficiency and carbon emissions as part of a building's use should be addressed and not planning policy (Home Builders Federation)
- Supportive but needs to be flexibility within any policy for small-scale renewable energy to allow the appropriate strategy to be designed on a site-by-site basis (L&Q)
- Question the practicality of three trees per new home, particularly regarding how it would work for flats and suggest an off-site provision as an alternative where impractical (CHP).

Summary of Developer/Landowner/Agent Comments:

- General support for the need to address the climate and ecological emergency but there is a need to ensure such policy requirements, alongside all other development requirements, are fully evidenced, financially viable as well as flexible where things cannot be delivered on site (London & Cambridge Properties Ltd, Aquila Developments, Taylor Wimpey, Dandara, Ptarmigan Chelmsford A Ltd, Stonebond Properties Ltd, Bloor Homes, Dandara Eastern, Greystoke CB, Hill Residential Ltd, Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern), Gleeson Land, Bellway Homes Ltd, Chelmsford Garden Community Consortium, Gladman Developments Ltd, Bellway Strategic, Graham Dines)
- There is a need to ensure policies are sufficiently flexible so as to not be at risk of becoming inconsistent with forthcoming changes to national policy and changes to building regulations (Wates Development, Bellway Homes Ltd)
- Supports the Councils objectives of reducing carbon emissions and targeting net zero by 2030 but this commitment presents challenges e.g. many of the technologies required to achieve net zero have not yet been identified and therefore are unlikely to be in place before 2030 (Chelmsford Garden Community Consortium, Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern)
- Strategic Policy S2 lists a range of measures to reduce a developments carbon footprint but is not overly prescriptive. Continued flexibility across any new policies would be welcomed as it allows flexibility and can be applied across all types of new development (Chelmsford Garden Community Consortium)
- Support the approach in this section (Grosvenor Property UK and Hammonds Estates LLP, Harris Strategic Land Ltd, Rosehart Properties Ltd, Pembridge Land Group, Persimmon Homes, Gleeson Land)
- Energy efficiency should be prioritised over the use of renewable energy to ensure that the energy requirement of any development is reduced as far as possible before renewable energy is designed into the scheme (Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern)
- Requirement for all new development to include small-scale renewable energy on site, alongside requirement of three new trees per home is not supported as it may impact deliverability (Bellway Strategic)
- Question the practicality of three trees per new home on site and new development should not have to source land for this from elsewhere, a qualitative design-led, site by site approach should be used instead (Bellway Homes Ltd, Gleeson Land)

- No assessment of the cumulative impact of planting three trees per home in tandem with BNG requirements has been carried out and it could represent doubling up (Bellway Homes Ltd)
- Policies to increase tree planting should go beyond residential development and reference net gain of tree planting from development and focus on good design, rather than an arbitrary number (Dominvs Group)
- Support for new allocations for tree planting (Cliffords Group Ltd)
- Going beyond Future Homes Standard, expected to be incorporated into building regulation requirements, is not supported (Gleeson Land, Bellway Homes Ltd, Bellway Strategic)
- Building Research Establishment Environmental Assessment Method (BREEAM) alternatives need to be explored given the issues which have been identified in connection with commercial schemes (Aquila Developments Ltd)
- The aims and aspirations of the Council's Waterways Working Group should be reflected in the policies, particularly regarding infrastructure provision (Vistry Group)
- Inadequate consideration given to the flood risk dangers to the city centre, and the opportunities for enabling development to facilitate the provision of key infrastructure that will alleviate flood risk (Vistry Group)
- Prioritise development near the new Railway Station to assist in reducing carbon emissions through travel (Chelmsford Garden Community Consortium).

Summary of Public Comments:

- Strategic Policy S2 should be divided into separate policies on flood risk and climate change, as flood risk exists independently of climate change and combining the two understates the importance of sound planning policy to mitigate flood risk in new and existing development
- Support in principle but needs to be much stronger in terms of the requirements e.g. requiring new homes to all be net zero carbon
- Agree with the approach but question if it is achievable
- More detail is needed on how the suggested policies could be achieved, some areas lack commitment to specific actions
- More needs to be done on these issues at a cross-border level with neighbouring authorities
- There appear to be contradictions e.g. protecting the natural environment but building extensively on green space
- Strongly disagree that such requirements could adversely affect development viability as such homes would surely command a premium value
- Disagree that there is a climate emergency
- All new houses and Council buildings should be required to have solar panels installed
- All homes should be well insulated
- The Council needs to do more regarding recycling a greater number of household products like TerraCycle does
- Heritage Assets need to be considered alongside this issue

- Support for new tree planting but concern over tree lined streets having maintenance issues and that tree planting should not be at the expense of other habits
- Sustainable modes of transport do not take into account the lifestyle of most residents or how most families live
- Light railway systems should be considered
- Active modes of transport need to be safe to use and well-lit
- There should be no building on flood plains or areas which worsen flood risk
- Rainfall and flood risk needs to be considered as a cross boarder issue with other authorities
- Developments should be required to consider the wider impacts of flood risk, water run-off etc and not just within their site
- Additional on and off-site water storage and recycling needs to be considered
- Sea level rise has not been considered.

Our evidence says
The Preferred Options IIA 2024 focuses on sustainable development through a number of inter-related topics. Policies to address the climate and ecological emergency would make a positive contribution to a number of the IIA objectives, with significant positive effects on biodiversity, flood risk and climate change.
Evidence behind Policy DM31 (Net zero carbon development (In operation)) supports the requirement for certain forms of development to be net zero carbon, in operation. The Local Plan Viability Update (August 2023) shows this can be achieved in combination with other policy requirements.
The Water Cycle Study Reports 2024 recommend rainwater harvesting for water re-use as set out in Policy DM25 (Sustainable Buildings). This policy also reflects Essex and Suffolk Water's latest draft Water Resources Management Plan 2024 and Essex County Council's emerging Essex Water Strategy. Further recommendations in the reports will inform updates to the Making Places SPD and the Pre-Submission Local Plan.
The SFRA Level 1 2024 report provides recommendations regarding all sources of flood risk in the Chelmsford City Council's administrative area which can be used to inform policy on flood risk within Local Plans. This includes how the cumulative impact of development should be considered. It also provides the latest flood risk data and guidance to inform the Sequential Test and provides guidance on how to apply the Exception Test. The SFRA Level 2 2024 assessment builds on identified risks from the Level 1 assessment for proposed development sites, to provide a greater understanding of fluvial, surface water, groundwater, and reservoir related flooding risks to the site. From this, CCC and developers can make more informed decisions and pursue development in an effective and efficient manner. The Level 2 assessment also identifies sites for further risk analysis at the site-specific Flood Risk Assessment (FRA) stage.
The Local Plan Viability Update 2023 shows at least 10% biodiversity net gain and three new trees per net new dwelling can be achieved in combination with other policy requirements. The garden community allocations will be required to achieve 20% biodiversity net gain.
The majority of the agricultural land in Chelmsford is either Grade 2 or 3. The Best and most versatile agricultural land is classified as Grades 1-3a. The Preferred Options Spatial Strategy promotes development on previously developed sites.

Our evidence says
However, as the identified development needs cannot be accommodated solely on previously developed land, the loss of some agricultural land to development is inevitable. The Preferred Options Local Plan would lead to a loss of approximately 853 hectares of Grade 3 agricultural land and approximately 246 hectares of Grade 2 land. This equates to around 2.4% of the total Grade 2 and around 4.2% of the total Grade 3 land in the plan area, although further site-specific assessments are needed to determine the split between Grade 3a and 3b.

The Preferred Options Local Plan
Sustainability is addressed in the supporting points to the Vision.
Addressing climate change is woven into the Preferred Options Local Plan throughout. The preferred Options Climate Change Topic Paper sets this out in more detail.
Strategic Policy S2 (Addressing climate change and flood risk) and Development Management Policy DM31 (Net Zero Carbon Development (In operation) introduces the need for new development to be net zero carbon in operation.
Strategic Policy S2 (Addressing Climate Change and Flood Risk) and Development Management Policy DM18 (Flooding/SuDS) have been updated to reflect latest national policy guidance.
Strategic Policy S2 (Addressing Climate Change and Flood Risk) and Development Management Policy DM25 (Sustainable Buildings) requires all new dwellings to meet the Building Regulations optional requirement for water efficiency of 110 litres/person/day.
Strategic Policies S4 (Conserving and Enhancing the Natural Environment) and S9 (Infrastructure Requirements) identifies the need for waste water discharge and treatment to be factored into infrastructure required to support development. Existing sites rolled forward from the adopted Local Plan in Great Leighs, where there is a need for timely improvements to be made to the waste water recycling centre, requires appropriate waste water treatment provision and disposal is available in time to serve the site, including any associated sewer connections and any required mitigation within the sewerage network.
The Essex and Suffolk Shoreline Management Plan aims to reduce the threat of flooding and erosion to dwellings, key infrastructure and tourism facilities along Chelmsford's coastal fringe around South Woodham Ferrers. The Marine Management Organisation (MMO) South East (Inshore) Marine Plan also includes land to the south of South Woodham Ferrers. The Marine Plan's jurisdiction overlap with the Council's responsibilities (which extend to mean low water) and due regard must be given to the Marine Plan. The South East (Inshore) Marine Plan, must be considered alongside the Local Plan, to provide a consistent approach for planning on land, and within the inter-tidal and marine environment. This is set out in the Preferred Options Local Plan.
Strategic Policy S2 (Addressing Climate Change and Flood Risk) and Development Management Policy DM17 (Trees, woodland and landscape features) introduces the requirement for three new trees to be planted per net new dwelling, and a significant number of new trees to be planted for major new employment and infrastructure development. It also includes details of where on-site planting is impractical and the need to take into account the long-term

The Preferred Options Local Plan
relationship between trees and a development. The Council's Tree Planting Advice note provides further detailed information.
Strategic Policy S2 (Addressing Climate Change and Flood Risk) and Development Management Policy DM19 (Renewable and Low Carbon Energy) allow solar and wind farms to be approved in suitable locations. Further allocations for such development are not included in the Local Plan for the reasons set out in the Preferred Options Climate Change Topic Paper.
Strategic Policy S9 (Infrastructure Requirements) identifies opportunities for renewable and low or zero carbon or district-scale energy production as being potential infrastructure required to support developments. Renewable, low carbon and decentralised energy schemes are also encouraged to be considered in larger site allocations at Strategic Growth Site 6 (North East Chelmsford – Chelmsford Garden Community) and Strategic Growth Site 16a (East Chelmsford Graden Community (Hammonds Farm).
The consideration of the impact renewable energy proposals may have on historic assets is covered in more detail in the Making Places SPD. This will be reviewed, and any appropriate changes/additions included. Further information on the approach to the Historic Environment is set out in the Preferred Options Topic Paper.
Active and sustainable travel are covered through the Preferred Options Local Plan. They are included within Strategic Priority 1 (Addressing Climate Change and Ecological Emergency), 2 (Promoting smart, active travel and sustainable transport), 3 (Protecting and enhancing the Natural and Historic Environment, and support an increase in biodiversity and ecological networks), 7 (Creating well designed and attractive places, and promoting the health and social wellbeing of communities), and 8 (Delivering new and improved strategic and local infrastructure), and feed into Strategic Policy S1 (Spatial Principles). The need for active and sustainable transport to be included in development is then required in Strategic Policies S2 (Addressing Climate Change and Flood Risk), S14 (Health and Wellbeing), S5 (Protecting and Enhancing Community Assets), S16 (Connectivity and Travel), S9 (Infrastructure Requirements), S11 (The Role of the Countryside), S17 (Future of Chelmsford City Centre), through site allocation policies, and through Development Management Policies DM4 (Employment Areas and Rural Employment Areas), DM7 (New Buildings and Structures in the Green Wedge, DM10 (Change of Use (land and buildings) and Engineering Operations), DM20 (Delivering Community Facilities), DM24 (Design and Place Shaping Principles in Major Developments, and DM27 (Parking Standards).
Strategic Policy S4 (Conserving and Enhancing the Natural Environment) and Development Management Policy DM16 (Protection and Promotion of Ecology, Nature and Biodiversity) requires qualifying developments to provide a minimum of 10% biodiversity net gain above the existing ecological baseline value of the site (20% on the Garden Communities). It also supports creating biodiversity sites in appropriate locations.
Strategic Policies S4 (Conserving and Enhancing the Natural Environment) and S17 (Future of Chelmsford City Centre), and relevant site policies include the need for development to take into account the Council's Plan for Improving Rivers and Waterways 2022 (Item 7 on Agenda available via the link), which sets out opportunities to improve the appearance, attractiveness, and recreational use of

these assets and to promote schemes and activities that enhance their habitat, ecological and biodiversity value.

2 Promoting smart, connected active travel and sustainable transport

Key statistics tables

Question	Yes	No	Comments	Total number of responses
9. Do you agree with the proposed approach being taken? If not, please give the reasons for your answer.	37	12	39	88
10. Do you have any views on the Council's current local planning policies of relevance to smart, active travel and sustainable transport and the decisions they lead to?	N/A	N/A	31	31
11. Do you have any views on the areas identified for additional or enhanced policy requirements?	N/A	N/A	35	35
12. Do you have any views on the proposed ideas for new policies?	N/A	N/A	39	39
13. Have we missed anything? Where possible, please support your answer with reference to any evidence.	N/A	N/A	25	25

Summary of Specific and DTC consultees comments:

- Support for the proposed approach (Essex County Council, Rochford District Council, Sandon Parish Council, Braintree District Council, Chignal Parish Council, Writtle Parish Council)
- Broadly agree with the proposed approach and welcome measures to improve cycle parking and storage but there are some key omissions including the urgent need for new cycle routes and paths, for sustainable transport infrastructure to take account of very local opportunities and constraints, and the potential role of Parish Councils in helping to bring infrastructure forward (Broomfield Parish Council)
- There needs to be a radical rebalance to support sustainable transport, for instance lane narrowing to accommodate safe cycle lanes and reduce vehicle speeds. Compulsory Purchase Orders should be considered where necessary (Broomfield Parish Council)
- Current plan policies have resulted in development in areas without a good level of existing or proposed transport infrastructure and/or little capacity for sustainable travel infrastructure. For example, West Chelmsford and North of Broomfield have had proposed sustainable transport infrastructure withdrawn including a bus gate and the Great Waltham Cycle Route respectively (Broomfield Parish Council)

- It is envisaged that all transport interventions will need to consider carbon impacts and that the emerging new Local Transport Plan will include a specific carbon zero transport target (Essex County Council)
- The Local Cycling and Walking Infrastructure Plan (LCWIP) is being updated and will need to be considered in the review (Essex County Council)
- Have a greater emphasis on promoting integrated sustainable transport (particularly in relation to new road options); encouraging the use of Travel Plans; provision of suitable linkages for pedestrians and cyclists; enabling passenger transport options in new developments; and the connectivity between housing and employment areas (Essex County Council)
- The provision and delivery of active and sustainable travel infrastructure in Local Plan policies should make sustainable modes favourable in comparison to the private car, to promote modal shift. CCC is referred to the findings of the independent Essex Climate Action Commission (ECAC) Report 2021 (Essex County Council)
- Cycleway, junction improvements and traffic management measures are already being implemented as part of the Chelmsford Active Travel Fund to help address peak time capacity issues on main roads through the city centre (Essex County Council)
- ECC has published its Bus Service Improvement Plan (2021 - 2026) to provide a new, high quality and reliable bus network (Essex County Council)
- Bus Network Reviews are being undertaken to identify barriers to passenger growth, connectivity or accessibility; identify measures to over-come the barriers and promote bus passenger growth (Essex County Council)
- ECC is undertaking a number of projects and reviews with regards to highway and transportation policy for existing and for new communities, which will feed into Local Transport Plan (Essex County Council)
- Support the principle of establishing multifunctional greenways to promote sustainable and active travel movements and contribute to health and wellbeing (Essex County Council)
- Welcome working with CCC on new highway and sustainable travel options, any implications arising from the A12 widening scheme, the integration of sustainable travel with any road proposals, and any transport hubs to support sustainable growth. However, the wider effect of any such new infrastructure will need to be fully assessed through the transport evidence (Essex County Council)
- ECC acknowledges there is a need for more innovative ways to tackle behavioural change regarding the take up of sustainable modes rather than the present approach by simply monitoring travel patterns. ECC is presently reviewing travel planning requirements for new developments to focus on achieving and maintaining higher mode share targets for active and sustainable travel (Essex County Council)
- Plan policies should include proactive action to retrofit public EV charging points in residential areas and not just focus on provision for new housing developments (Great Waltham Parish Council)
- Off peak bus services in Great Waltham are poorly used and need to be more affordable (Great Waltham Parish Council)
- Consider charging by car at the Park and Ride facilities to encourage more people to car share to them (Great Waltham Parish Council)

- No recognition in current plan policies of the need to connect South Woodham Ferrers and the villages to Chelmsford City other than by existing roadways. Better connectivity is needed by bike off the current road network and bus services need improving to encourage a shift away from the private car (South Woodham Ferrers Town Council)
- Support the installation of more domestic and publicly accessible EV charging points and ECC's preferred standards. ECC is preparing an Electric Vehicle Strategy to help with the roll-out of charging infrastructure and will work with CCC to help identify charging point locations and funding opportunities (Essex County Council)
- Support requiring contributions towards or the provision of car clubs on all major development sites (Essex County Council)
- Support the potential to allocate or safeguard land for expanding current Park and Ride sites (Essex County Council)
- ECC would still like to develop a new Park and Ride site to the west of Chelmsford in the future and which may well depend on the preferred spatial strategy (Essex County Council)
- New initiatives should have the broadest possible appeal (Great Waltham Parish Council)
- Developments should not go ahead without agreed transport infrastructure (Broomfield Parish Council)
- Support expansion of EV charging stations like Gridserve at Great Notley (Braintree District Council)
- Support proposals for walkable neighbourhoods for new major developments and considering how new neighbourhoods can be connected to the wider area (Braintree District Council)
- Support for many of the proposed policy changes including 15/20 Minute Walkable Neighbourhoods. Attractive active and public transport links should be provided between new and existing communities and between communities and infrastructure to promote integration and to ensure that benefits of growth are felt by the whole population (Mid and South Essex Integrated Care Board)
- Welcomes the opportunity to work with CCC to articulate what the health and wellbeing elements of a walkable neighbourhood would comprise and to consider how the principles can be applied to existing neighbourhoods to support reduction in health inequalities and improve population health (Mid and South Essex Integrated Care Board)
- Broadly supports the approaches being considered for new policies, acknowledging the relatively poor north-south connections within Essex. Would support opportunities to deliver better connected communities across the plan area including those settlements closer to Rochford District to its south, including South Woodham Ferrers (Rochford District Council)
- Support delivery of improvements to integrated active travel and sustainable transport routes between Rochford District and locations within Chelmsford City (Rochford District Council)
- Support for exploring a new policy on 15/20 minute walkable neighbourhoods within major developments. Suggest CCC consider current good practice and advice from the Town and Country Planning Association, the Essex Design Guide (EDG) and Sport England's latest Active Design guidance to be published in 2023 (Sport England)

- Support 15/20 Minute Walkable Neighbourhoods (Great Waltham Parish Council, Broomfield Parish Council)
- Still need provision for those who cannot walk/cycle 15/20 minutes or when things such as adverse weather make walking/cycling difficult or unsafe (Great Waltham Parish Council)
- The success of policies will depend on buy-in from other stakeholders such as education, employers and retailers (Broomfield Parish Council)
- 15/20 Minute Walkable Neighbourhoods should be an aspiration within appropriate locations rather than a blunt tool for site allocations or if could be used to prevent appropriate development, for example, in rural areas which are unable to meet all the principles. Success will require CCC to work with its partners to ensure local public services are in place and are retained (Home Builders Federation)
- Concern over whether 15/20 minute walkable neighbourhoods will be sustainable (Chelmer Housing Partnership)
- Question whether there is demand for allocating and safeguarding land for Park & Ride expansion; would be better if residents had a reliable, comfortable bus service to Chelmsford when they need it (South Woodham Ferrers Town Council)
- Needs to be more secure cycle storage facilities to increase bicycle travel including South Woodham Ferrers (South Woodham Ferrers Town Council)
- Useful to engage regarding future consideration of rapid transit e.g. linking to the Great Dunmow, the airport and the A120 corridor (Uttlesford District Council)
- Plan should mention of the role of parish councils in promoting sustainable transport infrastructure, especially through neighbourhood plans, for example, ensuring that proposals make sense locally. However, they need officer support particularly from Essex Highways and funding (Broomfield Parish Council)
- Alongside the proposal for 15/20 minute neighbourhoods, there needs to be a greater recognition of the need to locate major new housing developments close to commuting infrastructure. Major housing therefore needs to be located close to relevant transport hubs (e.g. the new rail station) and the A12 and A130 (south) corridors. It should be a given for all the five Spatial Approaches (Broomfield Parish Council).

Summary of General Consultees Comments:

- Support for the proposed approach (Newlands Spring Residents Association, Chelmer Housing Partnership, North West Parishes Group)
- Plan policies have resulted in development in areas without a good level of existing or proposed transport infrastructure and/or little capacity for sustainable travel infrastructure. For example, West Chelmsford and North of Broomfield have had proposed sustainable transport infrastructure withdrawn including a bus gate and the Great Waltham Cycle Route respectively (North West Parishes Group)
- Focus development closer to strategic transport corridors, such as the A12, the A130 and rail stations (North West Parishes Group)
- Sustainable transport alternatives need to be affordable and reliable (Chelmer Housing Partnership)

- Provide more detail on how proposals will be managed in more rural locations (Chelmer Housing Partnership)
- Support expressed for proposed policy changes (Chelmer Housing Partnership, L&Q)
- Evidence shows that hyper local neighbourhoods are more inclusive and resilient and overall build better communities for example, Sustrans (Chelmer Housing Partnership)
- Providing storage facilities for cycle equipment is often a design challenge; suggest that it would be the residents' choice whether to use the storage provided within their homes for cycle equipment, rather than imposing this as an additional storage requirement (L&Q).

Summary of Developer/Landowner/Agent Comments:

- Support expressed for the proposed approach (Pembridge Land Group, Grosvenor Property UK and Hammonds Estates LLP, Rosehart Properties Ltd, London & Cambridge Properties Limited, Taylor Wimpey, Croudace Homes, Vistry Group, Dandara, Wates Developments Limited, Chelmsford Garden Community Consortium, Dandara Eastern, Bellway Strategic, Bellway Homes Ltd, Harris Strategic Land Limited, Greystoke CB, Hill Residential Ltd, Dominvs Group)
- Approach is consistent with national planning policy (Croudace Homes, Wates Developments Limited)
- Proposed approach should go beyond the identified initiatives and acknowledge that reliance on the private car is inevitable in more rural areas which are less accessible by sustainable modes of transportation (Dandara)
- The Strategic Priority should reference the role of settlement patterns in minimising travel by the private car (Dominvs Group)
- Support/endorse current plan policies (Taylor Wimpey, Gladman Developments Ltd, Pembridge Land Group, Dominvs Group)
- Consider more policy changes around opportunities for active travel. This will be particularly important if new development is allocated around the city (Dandara)
- Support expressed for some/all of the proposed policy changes (Taylor Wimpey, Rosehart Properties, Dominvs Group)
- Contributions to car club spaces off-site should be an evidenced base approach to justify how a contribution may support delivery and where else this should be located (Wates Developments Limited)
- Car Clubs policies should not focus on simply the number of car club spaces for a development but instead evidence consultation with car club providers and the encouragement of residents to use them (Dominvs Group)
- Should be cautious not to duplicate building regulations requirements for EV car charging points and to future proof the plan in the event that building regulations change (Wates Developments Limited)
- Designing EV charging points into new developments is more cost effective than seeking to install them retrospectively (Dandara, Graham Dines)

- Planning policies to “future proof for autonomous vehicles” is forward-thinking but could become unnecessarily onerous given the embryonic technology and associated legislation (Dominvs Group)
- Do not support policies to future proof developments to accommodate autonomous vehicles. This is contrary to the aspirations of NPPF and may promote new development that prioritises car usage over active and sustainable travel modes (Bellway Strategic, Bellway Homes Ltd)
- Support a flexible approach to 15/20 minute walkable neighbourhoods which reflects the context of each site and lower site densities that may be required in rural areas (Dandara, Dandara Eastern)
- Any specific policies that may be developed should be evidence-based and viability tested. The future expansion of Park and Ride facilities must be justified by need, together with mechanisms for recovery of land in the event that projected levels of demand for the Park and Ride facilities do not occur at the point when the plan is adopted (Ptarmigan Chelmsford A Limited)
- The review plan should continue to maximise development in Chelmsford City Centre and include ambitions for travel within the city centre itself. For example, the creation of a network of positive, animated, active, safe routes and spaces and to feed footfall into key areas of the existing city centre network (Dominvs Group)
- Allocate new development in Service Settlements to help increase bus service provision and a shift towards more sustainable modes of travel (Dandara)
- Significant growth within rural villages and along transport corridors is considered to consolidate an existing reliance on private car travel within these locations, and does not align with the Council’s stated aspirations (Grosvenor Property UK and Hammonds Estates LLP)
- Sites in the Green Belt sites could deliver smart, active travel and sustainable transport (Hill Residential Ltd)
- Recognise the locational needs of the logistics sector and have policies to enable it to transition to a low carbon sector (Greystoke CB)
- Various developer/agent/landowner submissions comments suggesting that their proposed development sites will accord with the proposed approach.

Summary of Public Comments:

- Both support and opposition expressed for the proposed approach
- The approach/proposals are very Chelmsford City centric
- Support and opposition expressed for proposed policy changes and 15- 20 minute neighbourhood model
- Should require all new housing to provide direct access to cycling/walking networks alongside new homes
- Sustainable travel/alternatives to the car need to be realistic and affordable
- Better bus services are needed including in rural areas
- Unclear how initiatives will work in rural areas
- Ensure all new homes have electric charging points
- Also need to make existing development more sustainable
- The Chelmsford LCWIP is limited in scope and backward looking
- Greater active travel opportunities will require safe segregated and attractive active travel routes across the city
- Support using/extending Green Wedges for active travel where appropriate

- CCC should produce its own Cycling and Walking Strategy like East Suffolk Council
- Support for a light tram loop network to link new and planned developments to the railway stations. This could utilise existing bus lanes on Chelmer Valley Road
- Suggest a Bus Contract Pilot for Central Essex
- Traffic modelling needs to assess the impact of new development on Boreham Interchange which could worsen with the proposed improvements including the Chelmsford North East Bypass
- Cycle routes must extend further from the city centre and be safe to use, not on shared arteries
- Need to consider the impacts of autonomous vehicles increasing car ownership
- Ensure land is allocated for fossil fuel replacements
- Existing public transport is inadequate, and the policies lack vision
- Should do more to address areas of high traffic and rat runs
- Designate low traffic neighbourhoods
- New neighbourhoods should give priority to pedestrians and bikes over cars
- Need better bus services from villages to provide an affordable alternative to the car
- Focus development in urban areas closest to facilities and services
- Have shuttle buses across the city e.g. from Park and Ride to Broomfield Hospital
- Bike theft is an issue in the city centre
- Need up to date signage
- Remember the need for some residents to travel by car including the elderly
- Concern that proposals will not result in any improvement
- Ensure walking and cycling routes are future proofed for climate change for example, that they will not flood
- 15- 20 minute neighbourhood model will not work for Land North of South Woodham Ferrers given separation from the existing town by a road carrying increasing levels of traffic
- Most people need to travel significant distances to work which will likely be done by car rather than by bike
- Car clubs are highly unlikely to be of any use outside major centres of population
- Include reserve land needed for local infrastructure improvements for example, a new By-Pass / Ring Road to take the increasing levels of traffic generated by developments to the east of South Woodham Ferrers.

Our evidence says
The following traffic modelling has been undertaken: Sustainable Accessibility Mapping and Appraisal of Sites 2022 – this assessed 25 settlement areas identified across the five spatial approaches in the Issues and Options consultation document on their level of sustainable connectivity to key urban centres, employment, rail stations, bus services and bus stops, healthcare and education. They were also assessed on their digital connectivity highlighting the ability for residents to work from home thereby reducing peak hour journey

Our evidence says
trips on the local transport network. It should be noted that the appraisal assesses the current accessibility and connectivity of the locations and at this stage does not take into account future uncommitted infrastructure improvements which might come forward to support new development. Transport Impact Appraisal of Spatial Approaches 2023 – this sets out the modelling methodology, results, and findings of the traffic impact appraisal of three selected Spatial Strategy options, identified following the Issues and Options consultation. The evidence shows that, in terms of overall network impact (severity and breadth) and without considering the scope for mitigation, option 2 is modelled as having the smallest impact, and option 3 as having the largest. Option 1 is characterised as having a broader, but less pronounced impact on the road network. Transport Impact Appraisal of the Preferred Spatial Approach 2024 - sets out the modelling methodology, results, and findings of the traffic impact appraisal of the Spatial Strategy included within the Preferred Options. It concludes that impact on traffic is largely limited to the A12 corridor, the junctions along it and, to a lesser extent, the A1114 and A138 corridors into Chelmsford City Centre. Overall, the allocation of development in the Preferred Options consultation document provides the opportunity to make good use of existing and potential sustainable accessibility to and from proposed sites. However, this will be dependent on the delivery of the bus, cycling and walking infrastructure proposed, as well as additional measures required to provide the necessary connectivity to the wider sustainable transport network. This will be crucial to ensure that the growth in trips associated with the proposed development is managed and does not have a negative impact on the surrounding local area. By maximising the potential for sustainable accessibility to and from the sites along the A12 corridor, the impact on the strategic highway network should not be considered severe. The wider cross boundary impacts are included in the relevant assessments.
The Preferred Options IIA 2024 focuses on sustainable development through a number of inter-related topics. Policies to ensure the delivery of infrastructure would help to mitigate the impact of new development by relieving congestion and promoting sustainable transport, and when combined with the locational approach to employment and retail uses would have a significant positive effect on transport.

The Preferred Options Local Plan
Active and sustainable travel are covered throughout the Preferred Options Local Plan. They are included within Strategic Priority 1 (Addressing Climate Change and Ecological Emergency), 2 (Promoting smart, active travel and sustainable transport), 3 (Protecting and enhancing the Natural and Historic Environment, and support an increase in biodiversity and ecological networks), 7 (Creating well designed and attractive places, and promoting the health and social wellbeing of communities), and 8 (Delivering new and improved strategic and local infrastructure), and feed into Strategic Policy S1 (Spatial Principles). The need for active and sustainable transport to be included in development is then required in Strategic Policies S2 (Addressing Climate Change and Flood Risk), S14 (Health and Wellbeing), S5 (Protecting and Enhancing Community Assets), S16 (Connectivity and Travel), S9 (Infrastructure Requirements), S11 (The Role of the Countryside), S17 (Future of Chelmsford City Centre), through

The Preferred Options Local Plan
site allocation policies, and through Development Management Policies DM4 (Employment Areas and Rural Employment Areas), DM7 (New Buildings and Structures in the Green Wedge, DM10 (Change of Use (land and buildings) and Engineering Operations), DM20 (Delivering Community Facilities), DM24 (Design and Place Shaping Principles in Major Developments, and DM27 (Parking Standards).
Relevant proposed site allocation policies provide requirements for new or improved active travel routes.
New Strategic Policy S16 (Connectivity and Travel) and Development Management Policies DM7 (New Buildings and Structures in the Green Wedge), and DM10 (Change of Use (land and buildings) and Engineering Operations) introduce the role and function of Green Wedges to include infrastructure to support active travel.
Neighbourhood Plans which seek to assist in bringing forward more active and sustainable transport routes and infrastructure are welcomed.
New Strategic Policy S16 (Connectivity and Travel) includes reference to the Local Cycling and Walking Infrastructure Plan (LCWIP). The City Council rely on Essex County Council to produce these as the Highways and Transportation Authority.
New Strategic Policy S16 (Connectivity and Travel) seeks to create sustainable places which promote connectivity for all, by providing better access to modes of active and sustainable travel, including supporting development and infrastructure. It also includes new strategic scale developments to ensure they have considered how walkable neighbourhoods can be achieved, as well as achieve a significant modal shift to active and sustainable modes of travel.
New Strategic Policy S14 (Health and Wellbeing) includes the need for developments to create opportunities for active travel, including the provision of safe and attractive pedestrian and cycle routes. It also requires strategic scale development to incorporate Sport England and national Design Guide Active Design principles.
Strategic Policy S9 (Infrastructure Requirements) includes reference to the existing Essex County Council Local Transport Plan (LTP) and the need to continue to work with Essex County Council on the emerging LTP and include any further infrastructure requirements as they emerge. It also includes the consideration of additional Park and Ride facilities in West of Chelmsford and North East Chelmsford in the broad locations show on the draft Policies Map.
Development Management Policy DM25 (Sustainable Buildings) includes updated requirements for Electric Vehicle charging points. These are based on the Essex Part 1 Parking Guidance.

3 Protecting and enhancing the Natural and Historic Environment, and support an increase in biodiversity and ecological networks

Historic Environment

Key statistics:

Question	Yes	No	Comments	Total number of responses

14. Do you agree with the proposed approach being taken? If not, please give the reasons for your answer.	27	6	22	55
15. Do you have any views on the Council's current local planning policies of relevance to the historic environment and the decisions they lead to?	N/A	N/A	19	19
16. Have we missed anything? Where possible, please support your answer with reference to any evidence.	N/A	N/A	15	15

Summary of Specific and DTC consultees comments:

- The proposed approach to the historic environment is consistent with the latest national policy and guidance (Historic England)
- Important to celebrate local distinctiveness (Chignal Parish Council)
- Support the proposed approach of enhancement rather than preservation and avoiding harm of the historic environment (Broomfield Parish Council, Writtle Parish Council)
- Greater emphasis is needed for more control in areas with heritage assets (Writtle Parish Council)
- Reference needs to be made to Neighbourhood Plans (Writtle Parish Council)
- No issue with current plan policies (Great Waltham Parish Council)
- Current policies have led to some poor decisions (Broomfield Parish Council)
- Current policies do not have reference to local design codes (Broomfield Parish Council)
- South Woodham Ferrers was an outstanding 'Riverside Town' when built. The town's uniqueness has been overlooked in a historic sense. The town has a separate identity to Chelmsford (South Woodham Ferrers Town Council)
- What does 'celebrate' actually mean; it could represent something to everyone without being at all specific (Great Waltham Parish Council)
- Intention of the proposed policy is unclear and potentially contradictory (Great Waltham Parish Council).

Summary of General Consultees Comments:

- Support for the proposed approach to the historic environment (Newland Spring Residents Association).

Summary of Developer/Landowner/Agent Comments:

- Support expressed for the proposed approach (Grosvenor Property UK and Hammonds Estates LLP, Dominvs Group, Chelmsford Garden Community Consortium)
- Support the approach of enhancement of the historic environment rather than preservation and avoiding harm (Medical Services Danbury, Sampra Homes

Ltd, Mr A Smith, Marden Homes Ltd, Chelmsford Garden Community Consortium)
- The approach should make reference to how new developments can positively contribute to enhancement of heritage assets (Dominvs Group)
- Current plan policies are consistent with national policy (Pembridge Land Group, Rosehart Properties, Gladman Developments Ltd).

Summary of Public comments:

- Support the approach of enhancement of the historic environment rather than preservation and avoiding harm
- The proposed approach needs to be made clearer
- The current approach to Protected Lanes is inadequate and they should have their own policy
- Support expressed for current policies and references in the Making Places SPD about built environment heritage assets
- Need to restore the historical character of Essex
- More needs to be done to protect natural historical character such as historic battle locations and ancient woodlands
- Should preserve the character of villages for future generations
- Chelmsford has lost many of its historic buildings due to poor development decisions
- There is too much new building and not enough regeneration
- Plan should give more encouragement to using/visiting historic environments
- Current plan policies are ruining the historic environment
- The Making Places SPD should include the river confluence and water space including local heritage buildings such as Moulsham Mill.

Our evidence says
Four separate Heritage Assessments provide an assessment of the setting of designated and built non designated heritage assets within or in the vicinity of the preferred development sites. These have informed the site-specific allocations policies.
The Preferred Options IIA 2024 focuses on sustainable development through a number of inter-related topics. Policies to protect the historic environment would have significant positive effects on cultural heritage, landscape and townscape, and a minor positive effect on urban renaissance.

The Preferred Options Local Plan
Strategic Policy S3 (Conserving and Enhancing the Historic Environment), and Development Management Policies DM13 (Designated Heritage Assets), DM14 (Non-designated Heritage Assets), and DM15 (Archaeology) remain largely unchanged as they continue to be consistent with national policy and guidance and are supported by Historic England.
In line with the 2023 Heritage Assessments, the site policies identify any potential Historic Assets which require protection and/or mitigation measures to ensure they are not harmed through proposed site allocations.

The Preferred Options Local Plan
The Making Places SPD will be reviewed, and any appropriate changes/additions included.
Further information on the approach to the Historic Environment is set out in the Preferred Options Historic Environment Topic Paper.

Natural Environment

Key statistics:

Question	Yes	No	Comments	Total number of responses
17. Do you support the approach to be taken? If you disagree, please explain why	34	13	32	79
18. Do you have any views on the Council's current local planning policies of relevance to the natural environment and the decisions they lead to?	N/A	N/A	27	27
19. Do you have any views on the proposed ideas for new policies?	N/A	N/A	55	55
20. Have we missed anything? Where possible, please support your answer with reference to any evidence.	N/A	N/A	18	18

Summary of Specific and DTC consultees comments:

- Support for approach (Essex County Council, Anglian Water Services Ltd, South Woodham Ferrers Town Council, Great Waltham Parish Council)
- Recommends that CCC use Natural England's District Level Licensing (DLL) Risk Zones to steer development away from "amber" zones (there are currently no red zones in Essex) and use the Essex Green Infrastructure Strategy and Technical-Guidance as part of its evidence base, which have been endorsed by Natural England (Essex County Council)
- Particularly support approaches for increasing biodiversity net gain (BNG) that can be integrated with green infrastructure provision and SuDS to reduce surface water run-off from development (Anglian Water Services Ltd)
- The proposed allocation of land for tree and woodland planting is commended particularly where this would provide multiple benefits for the environment, such as reducing surface water run-off and protecting soils (Anglian Water Services Ltd)

- Any review of the Green Wedge policies should ensure no conflict with aims such as flood storage capacity and provision for wildlife (Anglian Water Services Ltd)
- Approach places insufficient emphasis on locally valued landscapes. Local communities and parish councils should be encouraged to evaluate and enhance their local landscape and any relevant studies should feed into a CCC landscape strategy. Neighbourhood Plans following this approach should be given flexibility in applying it to spatial planning (Broomfield Parish Council)
- Support expressed for this proposed new Strategic Priority (Chignal Parish Council)
- Current plan policies are considered acceptable (South Woodham Ferrers Town Council)
- Have encountered no issues with current plan policies (Great Waltham Parish Council)
- Current policies appear to lead to blanket protection of some areas, such as the Green Wedge, pushing development on to other valued landscapes including high grade agricultural land. Prefer a more granular approach where parishes and local communities are empowered to take their own evidence-based decisions about the value of local landscapes and their sensitivity/capacity to absorb development (Broomfield Parish Council)
- Support expressed for ideas for proposed new policies (Environment Agency, Great Waltham Parish Council, Broomfield Parish Council, Uttlesford District Council)
- Broadly support a mandatory requirement for BNG above 10%, and collaboration on delivering this at a pan-Essex level, where appropriate (Rochford District Council)
- Acknowledge the ambition for 20% BNG. Further collaborative working is necessary between councils to consider the feasibility of delivering 10% BNG. In considering mitigation for site allocations, use the mitigation hierarchy in the first instance ahead of any offsite BNG provision. The Local Nature Partnership and the Local Nature Recovery Strategy will consider BNG (Essex County Council)
- Interested in understanding the evidence needed to support the 20% BNG target and how it could be delivered in isolation or on a wider Essex geography (Braintree District Council)
- Support 20% BNG in principle but will need to be justified by a clear evidence base as the policy develops (Natural England)
- Suggest collaborating on how the 20% can be viably secured in policy and made effective by onward monitoring (Uttlesford District Council)
- Consider alternatives to tree planting for carbon retention, for example creation of a saltmarsh and growing hemp or bamboo (South Woodham Ferrers Town Council)
- Include a commitment in the plan to reverse the long term decline in the number of farmland birds, and plans for rewilding or the creation of large wildflower meadows to help our endangered insects. There is no mention of river water quality monitoring, analysis and enforcement for breaches of raw sewage into the River Crouch (South Woodham Ferrers Town Council)
- There is a need to support local communities and parishes to identify and enhance local biodiversity and landscape assets (Broomfield Parish Council).

Summary of General Consultees Comments:

- Support expressed for the proposed approach and a 20% BNG policy (Newland Spring Residents Association)
- Essential that CCC consults with local wildlife groups on planning applications impacting habitats (The Essex Badger Protection Group)
- Extend Green Wedges to the boundary of the district. Restore the previous Green Wedge southern boundary at Sandford. It was wrong to remove Manor Farm against peoples wishes (Save Sandford Mill Campaign)
- Support for at least 20% BNG (The Woodland Trust)
- A 20% BNG policy will mean that site viability will become an issue, due to the space required for biodiversity. Consider off-site provision so that the best habitat areas can be developed (Chelmer Housing Partnership)
- No justification as to why the 20% BNG target is necessary, directly related to the planning application or fairly and reasonably related in scale and kind to the development being proposed. There is still considerable uncertainty as to the cost of delivering 10% BNG let alone 20%. 20% BNG will add significant cost to development including if more offsite delivery is required. It is considered that the Government consider 10% sufficient to address the impacts of development on biodiversity relating to any site (Home Builders Federation)
- Support a 20% BNG for developments where they produce gains in real terms - not after sites are cleared of all ecological value, making it easy to provide 20% gain with a few lawns and some bird boxes (The Essex Badger Protection Group)
- The review plan should make specific mention of the value of important landscapes to the north-west of Chelmsford such as the Writtle Farmland Plateau and the Pleshey Farmland Plateau (North West Parishes Group)
- Interested in working with CCC in developing policies beneficial to trees and woodland including stipulating a minimum 50 metre buffer for development from ancient woodland where developments exceed 10 dwellings, encouraging veteran trees to be recorded on the Ancient Tree Inventory and requiring 20% BNG units to be maintained for a minimum of 50 years (The Woodland Trust)
- Local Nature Recovery Strategies should inform priority locations for new green infrastructure, and habitat creation and enhancement through BNG (The Woodland Trust)
- Everyone should be able to see three trees from their home and be no more than 300 metres from the nearest natural green space, with safe and accessible routes (The Woodland Trust)
- Consider our ‘Access to Woodland Standard’ which aspires that everyone should have a small wood of at least two hectares within 500 metres of their home and a larger wood of at least 20 hectares within four kilometres of where they live (The Woodland Trust)
- The Environmental Principles must be treated as a foundational component of the plan which must support the protection of sensitive natural assets, such as ancient woodland; be an exemplar of emerging BNG practice; and set high standards for the retention and provision of trees within developments (The Woodland Trust).

Summary of Developer/Landowner/Agent Comments:

- Support for the proposed approach to the natural environment (Grosvenor Property UK and Hammonds Estates LLP, Bellway Strategic, Hill Residential Ltd, Cliffords Group Ltd, Dominvs Group, Bellway Homes Ltd)
- Agree that natural environment policies need to ensure they are up to date with the most recent legislation and guidance (Dandara, Dandara Eastern)
- Support expressed for current plan policies – examples of reasons cited include that they are consistent with the NPPF and working effectively (Dominvs Group, Dandara, Dandara Eastern, Hill Residential Ltd, Rosehart Properties Ltd, Pembridge Land Group)
- Support provision for BNG for all major developments (Gray & Sons, Mr Alexander Micklem, Cliffords Group Ltd, Chris Buckenham, The Bucknell Family, Cliffords Group Ltd, Pigeon (Sandon) Ltd)
- Support approach to BNG as it encourages the development of brownfield sites which have the ability to make more transformative improvements to nature than the development of greenfield sites (Dominvs Group)
- Support the Council's ambition to exceed nationally set targets for BNG (Grosvenor Property UK and Hammonds Estates LLP)
- BNG minimum requirements must not compromise the deliverability of non-strategic sites (A.G. & P.W.H Speakman)
- 20% BNG would need to be supported by robust evidence (Greystoke CB)
- A requirement for 20% BNG would need to be finely balanced against viability and land use requirements (Gladman Developments Ltd)
- See how 10% BNG works in practice before reviewing the figure (Aquila Developments Ltd)
- There is uncertainty as to how the implementation of the 10% BNG target as secondary legislation is yet to be published. As such, retain a 10% BNG target with an ambition to exceed this where practical and feasible (Chelmsford Garden Community Consortium)
- Support a 10% BNG minimum requirement or flexibility for smaller sites and allocations to ensure they remain deliverable (H R Philpot & Sons)
- Deploy a more flexible approach to securing BNG on smaller sites to ensure they remain deliverable (Miscoe Enterprises Ltd, Hill Farm (Chelmsford) Ltd, C J H Farming Ltd)
- Requiring a BNG target above 10% should be an aspiration reflecting site circumstances (Taylor Wimpey, Rosehart Properties Ltd, Pembridge Land Group)
- Support BNG as part of developments, but there is no evidence base to justify a policy requirement higher than 10%. A better approach is for the policy to support national requirements, whilst encouraging developers to deliver a higher level of BNG where this is possible (Wates Developments Limited)
- Agree with the principle of BNG, but as 20% may be more difficult to achieve on previously developed sites a different approach should be explored (London & Cambridge Properties Limited)
- Do not support 20% BNG (Harris Strategic Land Limited, Bellway Strategic, Bellway Homes Ltd, Tarmac Trading Ltd, Gleeson Land)
- No evidence to support a 20% BNG target locally (Aquila Developments Ltd, Gleeson Land)

- Requiring 20% BNG could impact development viability/will need to be fully evidenced/justified (Dandara, Gleeson Land, Chelmsford Garden Community Consortium, Tarmac Trading Ltd, Taylor Wimpey, Bolton, S&D, Mr J Bolingbroke)
- Without any justification/evidence, 20% BNG is not considered effective or compliant with the NPPF. It will impact on the capacity and viability of development sites and the provision of other infrastructure and affordable housing as a larger proportion of available site area will be required for the delivery of habitat creation or enhancement. Retain the 10% minimum requirement for BNG (Bellway Strategic, Bellway Homes Ltd)
- Need to consider impact of 20% BNG cumulatively with the 'three for one' policy on new trees (Bellway Homes Ltd)
- 20% BNG on site could be difficult where existing ecological baselines are higher and will place pressure on the cost and availability of nearby land to provide off-site enhancements. Consider identifying large scale strategic opportunities in the review plan which developers could contribute to (Mr J Bolingbroke)
- Any BNG policy should recognise that where it cannot be achieved on site, off-site provision or financial contributions should be made subject to viability (Dandara)
- Target for 20% BNG is overly onerous and could be unworkable or unsustainable. Onsite provision could have implications on land take as a result of lowering average housing / employment densities onsite (Tarmac Trading Ltd)
- 20% BNG could undermine the deliverability of the plan and make some sustainable sites unviable. For example, if the current biodiversity value of a site is already high achieving a 20% increase will be significantly more difficult to achieve on site. The need to provide additional land off-site or purchase biodiversity 'credits' may negatively impact development viability and delivery of other benefits such as affordable housing (Gleeson Land)
- 20% BNG could impact the viability of a large number of developments and need to be fully evidenced. Suggest that any policy wording recognises that where it cannot be achieved on site, off-site provision or financial contributions should be made subject to viability as to not prevent the supply of housing (Dandara Eastern)
- Significant policy changes in the review plan could adversely affect the delivery timescales and viability of Chelmsford Garden Community Zone 1. Whilst the Development Framework Document (masterplan) reflects the aspiration to achieve 20% BNG for the development as a whole, the review plan should not set a target which exceeds the national requirement (Ptarmigan Chelmsford A Limited)
- 20% BNG will lead to the need for more land to be allocated for future development and potentially impact on development viability. Will need to be fully justified and evidenced. Any policy wording should recognise that where it cannot be achieved on site, off-site provision or financial contributions should be made subject to viability (Hill Residential Ltd)
- 20% BNG will need to be justified and tested. It will result in lower dwelling yields, meaning more allocated sites will be needed to deliver the housing requirement (Obsidian Strategic Asset Management Ltd)

- Local Plan Review should place an emphasis on equality of access to natural spaces, to ensure that the multifunctional benefits of green and blue infrastructure are available to all (Grosvenor Property UK and Hammonds Estates LLP)
- Promotion of land to the north of Roxwell for potential biodiversity offsetting (Tarmac Trading Ltd)
- Various developer/agent/landowner submissions made suggesting their site could contribute to BNG.

Summary of Public Comments:

- Mix of support and opposition for the proposed approach to the natural environment
- Proposed development at Hammonds Road would be inconsistent with the approach
- Unclear how development on a greenfield site can increase biodiversity
- There is too much green space being urbanised
- Plans/policies are not ambitious enough/need to do more
- Support flower planting alongside tree planting
- Countryside around wooded and common land should be given extra protection
- Our green spaces are fragmented and restrictive, and plans need to be more ambitious
- Essex needs a national park or Area of Outstanding Natural Beauty
- Work with other councils to dedicate and connect enormous areas of land for residents and wildlife
- Expand the narrow foot paths along rivers/farmland into vast wetland and meadows along the River Chelmer
- The environment of the Chelmer River, Chelmer Blackwater Navigation and the Chelmer Valley need protection from overuse, pollution and building
- Habitat and species mitigation/protection planning conditions need to be properly considered and enforced as they sometimes seem to be ignored
- Must push for as much BNG as possible together with endowment or stewardship schemes (as part of Section 106) that secure longevity and monitor biodiversity quality and ecological progress. Include streams and waterways
- Building on arable land and then adding trees and hedges to a new development does not increase biodiversity. A well-argued policy about preserving and enhancing the natural environment is needed
- Current policies are too loosely worded and meaningless, so securing net biodiversity gain is a tick box exercise
- No specific commitment in existing policies to the degree of access to be granted or how these areas will be protected from future development
- Support expressed for 20% BNG
- Arable land, unfarmed open grassland and wetlands also need to be preserved
- Need to ensure the BNG policy is properly delivered, monitored, enforced and the net gain is maintained. The long-term monitoring costs should lie with the developer and not the Council

- Plan should consider pesticide phase out and replacement alternatives
- Plan should consider water resources flood plains, allocation of beaver sites and reservoirs
- Consider areas of waterways upstream from the weir at Chelmer Waterside would benefit from a public realm scheme audit. The proposed highway access bridge will have a negative impact on the development potential of the environment and an alternative should be pursued
- Object to the Manor Farm development and new Country Park.

Our evidence says
The Local Plan Viability Update 2023 supports a 20% biodiversity net gain on the two Garden Communities. It also sets out the reasoning behind the approach retain a requirement for a minimum of 10% biodiversity net gain, while feasibility for a higher amount is being explored on all other policy requirements.
The Green Wedge evidence base reports support the policies in the Preferred Options Local Plan and notations on the draft Policies Map for the Green Wedge.
The Landscape and Sensitivity Capacity Assessments evidence base reports (2017, 2018 and 2024) support the policies in the Preferred Options Local Plan and the employment and housing notations on the draft Policies Map.
The Braintree, Brentwood, Chelmsford, Maldon and Uttlesford Landscape Character Assessment (2006) sets out the characters of the landscapes in the Chelmsford administrative area. This is still relevant.
The Preferred Options IIA 2024 focuses on sustainable development through a number of inter-related topics. Policies to protect the natural environment would make a positive contribution to a number of the IIA objectives, with significant positive effects on biodiversity, flood risk and climate change.
The Habitats Regulations Assessment (HRA) conducted as part of the Preferred Options IIA 2024 sets out that there is no reason suggest any particular site should not be allocated for HRA related reasons, and none of the proposed policies are likely to introduce fundamentally unavoidable adverse effects on the integrity of any European sites. Recreational pressure effects on the Essex Coast, water quality, water resources and air quality are all considered to be able to be suitably mitigated.
Essex Infrastructure Strategy describes the need for green infrastructure in Essex and sets a vision and objectives for the delivery of green infrastructure. The strategy has informed the policies in the Preferred Options Local Plan.
Chelmsford Green Infrastructure Strategic Plan 2018-2036 identifies the character and opportunities associated with Green Infrastructure across the City Council area and has informed the policies in the Preferred Options Local Plan.
GCN Risk Zones (Essex) | GCN Risk Zones (Essex) | Natural England Open Data Geoportal (arcgis.com) provides an interactive map that shows the extent and distribution of habitats in England.

The Preferred Options Local Plan
Updated Strategic Priority 3 promotes high quality green infrastructure, the protection, enhancement and creation of wildlife corridors and ecological connectivity.
Policy DM16 (Protection and Promotion of Ecology, Nature and Biodiversity) requires development to take account of the Chelmsford Green Infrastructure

The Preferred Options Local Plan
Strategic Plan, Local Nature Recovery Strategy (LNRS), and the Essex Green Infrastructure Strategy.
Strategic Policy S11 (The Role of the Countryside) makes it clear that any development within Green Wedges should not adversely affect the identified character and function of these distinctive landscapes, which includes flood storage capacity and provision for wildlife.
Strategic Policy S11 (The Role of the Countryside) includes reference to relevant evidence being prepared to support a Neighbourhood Plan being applicable to the consideration of an areas character.
Strategic Policy S4 (Conserving and Enhancing the Natural Environment) and Development Management Policy DM16 (Protection and Promotion of Ecology, Nature and Biodiversity) require qualifying developments to provide a minimum of 10% biodiversity net gain above the existing ecological baseline value of the site, it also encourages the delivery of a greater than 10% mandatory biodiversity net gain. Policy DM16 (Protection and Promotion of Ecology, Nature and Biodiversity) and site allocations policies Strategic Growth Site Policy 6 (North East Chelmsford – Chelmsford Garden Community) and Strategic Growth Site 16a (East Chelmsford Garden Community (Hammonds Farm) also require 20% biodiversity net gain on the two Garden Communities. Strategic Policy S4 and Policy DM16 also take into account local priorities set out in the Local Nature Recovery Strategy, the Essex Infrastructure Strategy and Chelmsford Green Infrastructure Action Plan, and supports creating biodiversity sites in appropriate locations, including sites associated with the emerging Local Nature Recovery Strategy. Further information on the implementation of BNG will be set out in a Planning Advice Note and updated Making Places SPD.
Strategic Policy S4 (Conserving and Enhancing the Natural Environment) and Development Management Policy DM16 (Protection and Promotion of Ecology, Nature and Biodiversity) require qualifying developments to contribute to the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS). The Essex Coast RAMS, which has the brand name Bird Aware Essex Coast, aims to deliver the mitigation necessary to avoid adverse effects on the integrity of habitat sites from the in-combination impacts of residential development in Essex.
Development Management Policies DM17 (Trees, Woodland and Landscape Features) and DM23 (High Quality and Inclusive Design) continue to protect natural landscape features which are important to the character and appearance of an area and requires development to respect the character and appearance of an area.
Development Management Policy DM17 (Trees, Woodland Landscape Features) introduces the requirement for three new trees to be planted per net new dwelling, and a significant number of new trees to be planted for major new employment and infrastructure development.
Changes to Green Wedge policies including Development Management Policy DM7 (New Buildings and Structures in the Green Wedge) do not conflict with aims such as flood storage capacity and provision for wildlife.
River water quality monitoring, analysis and enforcement for breaches of raw sewage into the River Crouch is outside the scope of the Local Plan.
Natural England’s interactive map, showing the extent and distribution of habitats in England, shows land that is not built-up or farmed to be 'amber'. Such 'amber'

land is identified in parts of many greenfield site allocations including 6, 16a and 16b. The Preferred Options Local Plan seeks to minimise the loss of this land. However, to meet our development needs it is inevitable that some such land will be lost. This should be balanced against the relative scale of the loss and other planning factors such as sustainability and general suitability for development of the location. In addition, the IIA does not suggest any particular site should not be allocated for HRA related reasons, and none of the proposed policies are likely to introduce fundamentally unavoidable adverse effects on the integrity of any European sites.
In addition, protection for newts and other species is achieved through policies such as Policy DM16 (Protection and Promotion of Ecology, Nature and Biodiversity) and design policies in general.

Strategic Priorities for Growth

4 Ensuring sustainable patterns of development and protecting the Green Belt

Countryside

Key statistics:

Question	Yes	No	Comments	Total number of responses
21. Do you support the approach to be taken? If you disagree, please explain why?	34	17	62	113
22. Do you have any views on the Council's current local planning policies of relevance to the countryside and the decisions they lead to?	N/A	N/A	36	36
23. Have we missed anything? Where possible, please support your answer with reference to any evidence.	N/A	N/A	17	17

Q21. Do you support the approach to be taken? If you disagree, please explain why?

Summary of Specific and DTC consultees comments:

- Support the proposed approach (Braintree District Council, Broomfield Parish Council, Essex County Council)
- Consider the balance between active travel corridors and flood storage capacity and wildlife as there may be a conflict between these aims (Essex County Council)
- Support sustainable greenways for improved health and wellbeing, recreation and commuting. All cycle ways and routes should be hard surfaced and consistent with cycling infrastructure design LTN 1/20 (Essex County Council)

- Support the broader role for the Green Wedges which includes aspirations for new active travel corridors (Broomfield Parish Council, South Woodham Ferrers Town Council)
- Development should be concentrated where there is less need for enhanced active travel corridors (Great Waltham Parish Council)
- Green Buffers are included in the Adopted Braintree Local Plan and these should be considered for Chelmsford too (Braintree District Council)
- Community feedback shows overriding importance of the countryside (Broomfield Parish Council)
- Concern about the sprawl of new development into green countryside (Great Waltham Parish Council)
- Green belt boundaries should only be altered where there is evidence and justified exceptional circumstances (Galleywood Parish Council)
- Approach opens up opportunity for development on Green Belt (Galleywood Parish Council)
- Concern that the green necklace around South Woodham Ferrers will disappear with potential development (South Woodham Ferrers Town Council).

Summary of General Consultees Comments:

- Green Belt should not be used for new footpaths or cycle links which would impact on local wildlife (The Essex Badger Protection Group)
- Support the proposed approach (Newland Spring Residents Association)
- Do not support any development which would adversely impact on the existing bridleway network (Essex Bridleways Association).

Summary of Developer/Landowner/Agent Comments:

- Support expressed for the proposed approach (Bellway Homes Ltd, Sempra Homes Ltd, Mr A Smith, Marden Homes Ltd, Greystoke CB, C J H Farming Ltd, Grosvenor Property UK and Hammonds Estates LLP, Dandara, Dandara Eastern, Cliffords Group Ltd)
- Proposed approach correctly protects the Green Belt in line with national policy (Bellway Homes Ltd, Bellway Strategic, Greystoke CB)
- Proposed approach directs growth to most sustainable locations in line with national policy (Dandara, Bolton, S&D, Dandara Eastern)
- Support the consideration given to Green Wedges in respect of the provision new active travel corridors (Sempra Homes Ltd, Bellway Strategic, Grosvenor Property UK and Hammonds Estates LLP, Obsidian Strategic Asset Management Ltd, Writtle University College and Endurance Estates, Wates Developments Limited, Stonebond Properties Ltd, Dandara, Saxtons 4x4, Mr J Bolingbroke, Miscoe Enterprises Ltd, The Bucknell Family, Cliffords Group and Mr Mark Peters, Cliffords Group Ltd, Hill Farm (Chelmsford) Ltd)
- Without a Green Belt Review allocations will create a distorted pattern of growth (Rosehart Properties, Pembridge Land Group, Barratt David Wilson)
- A Green Belt Review should be undertaken (Rosehart Properties, Writtle University College and Endurance Estates, Martin Grant Homes, Pembridge Land Group, Hill Residential Ltd, Vistry Group, Ravenscraig Close Ltd, Taylor Wimpey Strategic Land, Saxtons 4x4, Barratt David Wilson)

- Without allocating sites in the Green Belt settlements in the Green Belt will decline (Barratt David Wilson)
- Should allow for more development on brownfield/previously developed land in the Green Belt (Ravenscraig Close Ltd, Sedum Ltd)
- Updated Employment Needs Study is required to assess whether exceptional circumstances exist to release/review land in the Green Belt (Gray & Sons)
- Should consider the role of previously developed land in the urban area to reduce the amount of greenfield land developed (Sempra Homes Ltd, Marden Homes Ltd)
- Should consider expanding existing allocations/maximising the amount of housing in site allocations which are already considered sustainable for growth (Mr A Smith, Marden Homes Ltd)
- Should consider improving sustainable and active travel corridors between the countryside and city centre and not just in Green Wedges (Bellway Strategic)
- Sites for the logistics sector should be allocated outside of the urban area (Greystoke CB)
- Support the protection of the countryside but there should be a review of countryside policy (DM8) to assess the function of the Rural Area and whether it can accommodate a modest amount of residential growth (C J H Farming Ltd, A.G. & P.W.H Speakman, H R Philpot & Sons)
- Improvements in the city centre and waterways provide potential to enhance the Green Wedge and provide opportunity for use of the river for leisure and travel (Dominvs Group)
- Should allow for sustainable settlements to expand into the countryside to ensure the villages retain facilities and services (Dandara, Bolton, S&D, Marden Homes Ltd)
- Should be a review of the wider role of Green Wedges to assess if there are sites within or on the fringes in sustainable/accessible locations or of diminished quality which should be allocated for development (Stonebond Properties Ltd, Dandara Saxtons 4x4, Mr J Bolingbroke, Miscoe Enterprises Ltd, The Bucknell Family, Clifford Group, Cliffords Group and Mr Mark Peters, Hill Farm (Chelmsford) Ltd)
- Should consider the role of the Green Wedges for leisure, fitness, health and wellbeing beyond the proposed active travel corridors. Provision of leisure facilities/development in the Green Wedges which promote health and wellbeing should be explored and supported (Cliffords Group Ltd, David Lloyd Leisure and Aquila Development Ltd)
- Should consider the role of the Green Wedge in their entirety including in respect of rural diversification in particular rural based businesses and rural tourism as well as leisure (Cliffords Group Ltd).

Summary of Public Comments:

- Support new active travel corridors – these can reduce traffic and improve accessibility to the countryside
- New active travel corridors would conflict with the Green Wedge functions for flood storage and wildlife
- Protection for the Rural Area needs to be stronger
- No changes should be made to the Green Wedges
- Green spaces are needed for health and biodiversity

- Approach so far has not protected the Green Belt
- Protecting the Green Belt results in development only going north and west
- Villages are being lost into the urban area
- Green Belt should not be built on
- Green Belt to the south of Chelmsford is poorer quality land which could be developed.

Q22. Do you have any views on the Council's current local planning policies of relevance to the countryside and the decisions they lead to?

Summary of Specific and DTC consultees comments:

- Support the approach of current policies (Writtle Parish Council)
- Support the principle current policies to protect the Green Belt and Green Wedges (Uttlesford District Council)
- Suggest the creation of countryside protection zones around sensitive settlement locations where environmental quality is high. Should consider these along the district boundary with Uttlesford (Uttlesford District Council)
- The current blanket policy approach has pushed development to less protected highly valued landscapes for instance the Green Wedge boundary with the B1008 (Broomfield Parish Council)
- Developments on the edge of the city have insufficiently addressed the impact on the countryside (Great Waltham Parish Council).

Summary of General Consultees Comments:

- The current policy does not put emphasis on the creation of equestrian friendly routes (Essex Bridleways Association).

Summary of Developer/Landowner/Agent Comments:

- Current policies reflect the NPPF and direct development in the most sustainable locations (Dandara Eastern, Dandara, Graham Dines)
- The current Green Wedge policy is overly restrictive, and all of the land designated Green Wedge needs to be reconsidered to assess if it is capable of being used for its intended purpose (Sempra Homes Ltd, Obsidian Strategic Asset Management Ltd, Mr J Bolingbroke)
- Council should be more open towards developments in the countryside which could benefit the sustainability of smaller villages particularly sites with good public transport links (Dandara, Graham Dines, H R Philpot & Sons, C J H Farming Ltd)
- The Council should review the Green Belt boundary (Saxtons 4x4)
- Since the current Local Plan was adopted the NPPF has progressed, and the Strategic Policy and Green Wedge designation are constraining development (Obsidian Strategic Asset Management Ltd)

Summary of Public Comments:

- Current policies are inadequate as development has negatively impacted nature and local wildlife

- Current policies do not protect farmland in respect of food security
- Current policies do not emphasise enough the role of farmland in its role as flood protection
- Essential that policies discourage urban sprawl
- Imperative that the Local Plan continues to protect the Green Belt
- Imperative that the Local Plan protects from creating small satellite developments.

Q23. Have we missed anything? Where possible, please support your answer with reference to any evidence.

Summary of Specific and DTC consultees comments:

- South Woodham Ferrers should be connected with the National Cycle Network (NCN) with at least one dedicated cycleway (South Woodham Ferrers Town Council)
- South Woodham Ferrers at a disadvantage as it is not protected by Green Belt or the Green Wedge (South Woodham Ferrers Town Council)
- Important to retain through the review a 'green necklace' around the north of South Woodham Ferrers as part of any development in that location (South Woodham Ferrers Town Council)
- Approach should be broadened to be a more granular and with more of a local say (Broomfield Parish Council)
- Specific mention of the role of Neighbourhood Plans should be made about evidence-based decisions about the value of local landscapes and their sensitivity/capacity to absorb development (Broomfield Parish Council)
- Consideration should be given to the wider role of Green Wedges with regards to BNG, inclusion within the Local Nature Recovery Strategy (LNRS) and increasing access to nature (Natural England).

Summary of General Consultees Comments:

- None.

Summary of Developer/Landowner/Agent Comments:

- A Green Belt Review should be undertaken (Rosehart Properties Ltd, Pembridge Land Group, Taylor Wimpey Strategic Lane)
- Consultation is unclear on the approach to settlement boundaries (Aquila Developments Ltd).

Summary of Public Comments:

- Plan needs to have a greater emphasis on 'green jobs'.

Our evidence says
The Green Wedge evidence base reports support the policies in the Preferred Options Local Plan and notations on the draft Policies Map for the Green Wedge.

Our evidence says
The amount of development required during the plan period 2022-2041 can be accommodated outside of the Green Belt so there is no need to carry out a Green Belt review. This accords with national policy and guidance.
The majority of the agricultural land in Chelmsford is either Grade 2 or 3. The Best and most versatile agricultural land is classified as Grades 1-3a. The Preferred Options Local Plan Spatial Strategy promotes development on previously developed sites. However, as the identified development needs cannot be accommodated solely on previously developed land, the loss of some agricultural land to development is inevitable. The Preferred Options Local Plan would lead to a loss of approximately 853 hectares of Grade 3 agricultural land and approximately 246 hectares of Grade 2 land. This equates to around 2.4% of the total Grade 2 and around 4.2% of the total Grade 3 land in the plan area, although further site-specific assessments are needed to determine the split between Grade 3a and 3b.
The Urban Area Boundaries (UAB) and Defined Settlement Boundaries (DSB) Technical Note 2024 informs and supports the UABs and DSBs on the draft Policies Map.
The Preferred Options IIA 2024 focuses on sustainable development through a number of inter-related topics. Policies to protect the countryside would make a positive contribution to a number of the IIA objectives, with significant positive effects on biodiversity, landscape character, with minor positive effects on other objectives including transport, water, flood risk, cultural heritage, and climate change.

The Preferred Options Local Plan
Strategic Policy S11 (The Role of the Countryside) and Development Management Policies DM7 (New Buildings and Structures in the Green Wedge), DM9 (Infilling in the Green Belt, Green Wedge and Rural Area), DM10 (Changes of Use (land and buildings) and Engineering Operations), DM11 (Extensions to Existing Buildings within the Green Belt, Green Wedge and Rural Area), and DM12 (Rural and Agricultural Workers' Dwellings) offers an appropriate level of protection from development in the Green Wedge.
The Preferred Options Local Plan maximises the amount of development on previously developed land where available.
There are no alterations proposed to the Green Belt boundary. Strategic Policy S11 (The Role of the Countryside) and Development Management Policies DM6 (New Development in the Green Belt), DM9 (Infilling in the Green Belt, Green Wedge and Rural Area), DM10 (Changes of Use (land and buildings) and Engineering Operations), DM11 (Extensions to Existing Buildings within the Green Belt, Green Wedge and Rural Area), and DM12 (Rural and Agricultural Workers' Dwellings) allow for appropriate development in the Green Belt in accordance with national policy and guidance.
The countryside beyond the Green Belt and Green Wedge is known as the Rural Area. Strategic Policy S11 (The Role of the Countryside) and Development Management Policies DM8 (New Buildings and Structures in the Rural Area), DM9 (Infilling in the Green Belt, Green Wedge and Rural Area), DM10 (Changes of Use (land and buildings) and Engineering Operations), DM11 (Extensions to Existing Buildings within the Green Belt, Green Wedge and Rural Area), and DM12 (Rural

The Preferred Options Local Plan
and Agricultural Workers' Dwellings) provide an appropriate level of protection from development in these areas, in accordance with national policy and guidance.
Further information on the approach to the Spatial Strategy is set out in Preferred Options Spatial Strategy and Strategic Sites Topic Paper.
Where relevant site allocations make reference to the need to ensure bridleways are appropriately protected and/or enhanced and Development Management Policy DM10 (Changes of Use (land and buildings) and Engineering Operations) makes it clear that development which supports the role of the Green Wedge as an active travel corridor, includes proposals which facilitate greater use of all other active modes of travel, including leisure travel and horseback.
Strategic Policy S11 (The Role of the Countryside) has been amended to include reference to providing for nature in the Green Wedge, including through the Local Nature Recovery Strategy and biodiversity net-gain.
Strategic Policy S11 (The Role of the Countryside) includes reference to relevant evidence being prepared to support a Neighbourhood Plan being applicable to the consideration of an areas character.
The draft Policies Map indicates the proposed settlement boundaries across the Local Plan area.

Special Policy Areas (SPAs)

Key statistics:

Question	Yes	No	Comments	Total number of responses
24. Do you agree with the proposed approach being taken? If not, please give the reasons for your answer.	18	4	10	32
25. Do you have any views on the Council's current Special Policy Areas and the decisions they lead to?	N/A	N/A	14	14
26. Are there any additional Special Policy Areas you think should be added? Where possible, please support your answer with reference to any evidence.	N/A	N/A	15	15
27. Have we missed anything? Where possible, please support your answer with reference to any evidence.	N/A	N/A	10	10

Summary of Specific and DTC consultees comments:

- Support the proposed approach (Broomfield Parish Council, South Woodham Ferrers Town Council, Essex County Council)

- Support the proposed objective of strengthening access to the sites by sustainable modes of transport and minimising traffic pressures on local roads (Essex County Council)
- Concerns about adverse effects of Broomfield Hospital and Chelmsford City Racecourse Special Policy Areas SPAs on the Great Waltham Parish including impacts on local services and facilities (Great Waltham Parish Council)
- Policy should have a commitment to resolve issues arising from activity within the Broomfield Hospital SPA (Broomfield Parish Council)
- Development within SPAs need to be considered in the wider context of the adjoining area, for example traffic impacts generated by the development of Broomfield Hospital and how these are mitigated (Broomfield Parish Council)
- Developments within the Broomfield Hospital SPA do not always take account of adverse quality of life factors generated by their implementation (Great Waltham Parish Council)
- Any work needs to take account of cross border impacts at Broomfield Hospital, Chelmsford City Racecourse and Writtle University College SPAs (Uttlesford District Council)
- Need for stricter controls on development close to the boundary. Impact of development at Chelmsford City Racecourse SPA such as lighting on residents and wildlife in neighbouring districts needs more cross border working (Braintree District Council)
- Current SPA policy has not dealt with the issues around the flood lighting at the Chelmsford City Racecourse (Braintree District Council)
- Support approach to the wider Hanningfield Reservoir Treatment Works site given the impacts of climate change and the essential requirement to continue to supply water to the area and support the council's growth aspirations (Essex & Suffolk Water)
- Amend the Hanningfield Reservoir Treatment Works SPA to include proposals for renewable energy which would reduce reliance on the grid and also contribute towards achieving climate change goals (Essex & Suffolk Water).
- Current policy only refers to Hanningfield Reservoir Treatment Works site. The treatment works is only a part of the water infrastructure at the site and there are numerous pipelines and other infrastructure which may need to be upgraded or replaced and the policy does not recognise this (Essex & Suffolk Water)
- Current Policy has missed the increased role/emphasis of green and blue infrastructure in relation to leisure activities and its effect on health and well-being should be considered (Essex and Suffolk Water)
- Should include plans for active travel links to Hyde Hall and Hanningfield Reservoir SPAs from South Woodham Ferrers (South Woodham Ferrers Town Council)
- Clarification is required for the word 'development' in the RHS Hyde Hall SPA policy as to whether that means development which enhances facilities in the SPA or otherwise (South Woodham Ferrers Town Council)
- Existing SPA Policy has missed the provision of environmental mitigation measures in association with traffic movements generated through and from Uttlesford District (Uttlesford District Council)

- SPA masterplans should be developed in consultation with local communities (Broomfield Parish Council)
- Town Centre brownfield sites should be included as SPAs. This would then have tighter requirements for a denser and more urban form, co-location of uses, quality public realm befitting Chelmsford's city status and its role as a central location for investment. This would also help internalise movements, complement the Green Wedges to control development pressure around the periphery on the quality landscape and agricultural land in the countryside, and overall help to meet resource conservation, embodied carbon and climate change objective. The need is to reduce the impact of growth on traffic volumes and the principal road infrastructure particularly the ongoing impact westwards from Chelmsford on the network (Uttlesford District Council).

Summary of General Consultees Comments:

- Support the proposed approach (Newlands Spring Residents Association).
- The current SPA policy on Sandford Mill needs to be reviewed in line with the recommendations made on flooding, flood prevention and infrastructure improvements raised within the I&O consultation document (Save Sandford Mill Campaign).

Summary of Developer/Landowner/Agent Comments:

- Agree with the proposed purpose and objectives (Rosehart Properties Ltd)
- No evidence to support a need to designate more SPAs (Pembridge Land Group, Rosehart Properties Ltd)
- Former BAE site should be added as an SPA (Rosehart Properties Ltd)
- To enable delivery of the vision for Writtle University College (WUC), it would be helpful for the Local Plan Review to include a comprehensive review of planning policy at WUC, including the approach to the SPA. The existing policy is simply 'not special enough' and does not currently cover all areas of the campus (Writtle University College and Endurance Estates)
- Expansion of the Writtle University College SPA should be considered. A review of the SPA or Green Belt should be undertaken to include land to the west and south to allow for the continued investment and enhancement in the facilities at WUC (Writtle University College and Endurance Estates).

Summary of Public Comments

- Difficult to follow the proposed approach
- Unclear why Broomfield Hospital and Racecourse are SPAs
- Current SPA Policy is failing in respect of Broomfield Hospital and improving the difficult access to Broomfield Hospital should be included
- The land being developed around the hospital should be used for current and future needs of the hospital
- Natural areas should be protected as part of the proposed approach
- Chelmer Valley between Chelmsford and Maldon should be added as an SPA
- The Ridge in Little Baddow/Danbury should be added as an SPA
- Natural environment e.g. ancient woodlands, waterways and former royal hunting grounds should be added as an SPA

- Widford Estate and Hylands Park including the local golf course, businesses and potential park and ride site should be added as an SPA.

Our evidence says
The vehicular access road to Broomfield Hospital proposed in the adopted Local Plan is not part of the masterplan for the development North of Broomfield (SGS8) so is no longer considered achievable/deliverable.
The masterplan for Strategic Growth Site 3a East of Chelmsford – Manor Farm includes a connection to Sandford Mill with a proposed footway and cycleway bridge across the River Chelmer.
Writtle College and Anglia Ruskin University (ARU) merged in 2023. The Titchmarsh Centre at ARU Writtle is a University teaching facility, so is proposed for inclusion in the SPA.
The Preferred Options IIA 2024 considers that the spatial definition of the Special Policy Areas will limit the positive effects to within these areas, but will enable operation and functional requirements to be planned in a strategic and phased manner.

The Preferred Options Local Plan
Where relevant, the SPA policies include provision to manage impacts of development proposals on surrounding areas including minimising traffic pressures on local roads. This would include any mitigation measures that may need to be provided. A key objective of all the SPAs is to strengthen access to the sites by sustainable transport. Information on active travel plans would be too detailed for inclusion within the policies, but SPA1 (Broomfield Hospital Special Policy Area) and SPA4 (RHS Hyde Hall Special Policy Area) have been updated.
Reference to a new vehicular access road from the Main Road has been removed from Policy SPA1 (Broomfield Hospital Special Policy Area) as the road is no longer coming forward. No new residential allocations are proposed in the Preferred Options Local Plan around Broomfield Hospital.
Policy SPA2 (Chelmsford City Racecourse Special Policy Area) has been updated to ensure future developments have regard to nearby residential properties and wildlife.
Existing Policy SPA3 (Hanningfield Reservoir Special Policy Area) makes reference to water infrastructure and ancillary development and is considered fit for purpose. Any additional green/blue infrastructure proposals could be considered on their merits under the existing policy. There is also no need to make specific references to renewable energy proposals as this is adequately covered by Policy DM19 (Renewable and Low Carbon Energy) and the NPPF. The policy has been updated to promote ecological interest.
No amendment to SPA3 (Hanningfield Reservoir Special Policy Area) is proposed to remove the requirement to show a demonstrable need for schemes. This requirement is reasonable so an exception for it can be made in the Green Belt if appropriate. The existing SPA boundary already covers the wider area of Hanningfield Reservoir and promotes appropriate recreational uses.
A reference to connections to Sandford Mill from development to the south has been included in Policy SPA5 (Sandford Mill Special Policy Area).

The Preferred Options Local Plan
Writtle College has been changed to ARU Writtle in Policy SPA6 (ARU Writtle Special Policy Area). A reference to the Titchmarsh Centre has been added to the policy and the draft Policies Map to recognise that this is part of the University campus facilities. Land to the south is excluded from the SPA to protect potential coalescence with Writtle village. The sport pitches at Fox Burrows Lane are also excluded to protect the local landscape.
SPAs are used for facilities or institutions which lie outside built-up areas. This designation is therefore not appropriate on town centre brownfield sites, the former BAE Systems site, Widford Employment Area, The Ridge in Little Baddow/ Danbury, Chelmer Valley between Chelmsford and Maldon, Hylands Park and areas of land not linked to a facility/institution. Any changes to Green Belt boundaries would require a district-wide Green Belt review which is not being undertaken as it is not supported by national planning policy.

5 Meeting the needs for new homes

Housing

Key statistics:

Question	Yes	No	Comments	Total number of responses
28. Do you support the approach being taken? If you disagree, please explain why?	43	17	82	142
29. Do you have any views on the Council's current housing policies and the decisions they lead to?	N/A	N/A	34	34
30. Should we be considering any alternative options for a housing supply buffer?	N/A	N/A	48	48
31. Do you have any views on the proposed ideas for new policies or significant changes?	N/A	N/A	38	38
32. Have we missed anything? Where possible, please support your answer with reference to any evidence.	N/A	N/A	24	24

Summary of Specific and DTC consultees comments:

- Supports the approach that has been taken to date, but additional evidence base work needs to be undertaken, as identified by CCC, to ensure the Housing Requirement is adequately met (Basildon Borough Council)
- Supports the approach and confirms will not need CCC to meet any of their need (Braintree District Council)
- As CCC is proposing an over-provision, requests consideration is given to accepting some of their housing requirement (Castle Point Borough Council)

- Welcome the acknowledgement that any needs that cannot be met within neighbouring authorities will be considered in establishing the amount of housing to be planned for. This process should follow the Essex Planning Officers' Association (EPOA) Guidance Note Mechanism for the Consideration of Unmet Housing Need (2017) and the Mechanism for the consideration of Unmet Gypsy and Traveller Need (2018) (Essex County Council)
- Dispute the shortfall and need to provide a 20% buffer since there is nearly always a 20% uplift in the number of houses built on sites. 5% would be sufficient (South Woodham Ferrers Town Council)
- Supports the intention of CCC to fully meet its own housing needs within their administrative boundary including the 20% supply buffer and the use of the standard method (Essex County Council, Brentwood Borough Council, Uttlesford District Council, Rochford District Council, Maldon District Council)
- Disagree with a buffer and why 20% was chosen. The buffer is actually two buffers – rounding up to 1,000 dwelling per annum (dpa) plus an additional 20% buffer on top (Writtle Parish Council, Broomfield Parish Council, Great Waltham Parish Council, Boreham Parish Council)
- Any buffer should not be used to meet the needs of neighbouring authorities who are unable to meet their housing needs (Broomfield Parish Council)
- Community Land Trusts (CLTs), rural exception sites and the proposal for 'affordable housing sites adjacent to settlement boundaries' offer a better and more targeted way of meeting need, including Specialist Residential Accommodation (SRA), than increasing the buffer (Broomfield Parish Council)
- Disagree with having affordable housing on the edge of Defined Settlement Boundaries (DSBs) as it could lead to exclusion (South Woodham Ferrers Town Council)
- The list of parishes eligible for rural exception sites should be extended to include larger villages (Broomfield Parish Council)
- Will need to decide whether market housing should be used to support rural exception schemes as per paragraph 78 of the NPPF (Braintree District Council)
- More council-owned housing is needed and the site threshold for an affordable home requirement should be as low as possible (Great Waltham Parish Council)
- A 50% affordable home requirement on all sites would mean less allocations having to be made (South Woodham Ferrers Town Council)
- Welcomes the acknowledgement of the need to consider addressing the housing needs of specific groups within DM1, which may lead to the need to plan for a higher number than the standard method requirement (Essex County Council)
- The housing requirement should not be increased further to meet the needs of specific groups (South Woodham Ferrers Town Council)
- Work needs to be done to bring back empty properties into occupation (Great Waltham Parish Council)
- Support the intention to require higher standards for targeted, evidenced groups but encourage the application of the highest energy efficiency standards across all new homes and especially where the residents are anticipated to be the more vulnerable to fuel poverty and/or rising energy costs (Uttlesford District Council)

- The consideration of the need for home working should be considered as part of the Strategy Housing Market Assessment (SHMA) (Essex County Council)
- Local allocations through neighbourhood plans would ensure that development is located in the most appropriate locations and that infrastructure requirements are best suited to local circumstances (Broomfield Parish Council)
- A housing requirement for Designated Neighbourhood Areas only if applied to all neighbourhoods according to a common formula and replaces the current approach where developments of more than 100 dwellings are allocated as strategic sites through the Local Plan (Broomfield Parish Council)
- Support new or amended policies that help to deliver sufficient affordable homes, including for healthcare workers and more accessible and adaptable homes that assist residents to stay in their homes for longer as their needs change (Mid and South Essex Integrated Care Board, South Woodham Ferrers Town Council)
- There should be an enhanced commitment to pre-development engagement with local communities and their representatives (Great Waltham Parish Council)
- Support 10% of the housing requirement being on small sites (Essex County Council)
- 10% of the housing requirement being on small sites could be higher to support small construction companies (South Woodham Ferrers Town Council)
- Any new policy resisting inappropriate development in residential gardens needs to be consistent with the NPPF, paragraph 71 (Essex County Council)
- Support the reference to maintaining defined Urban Area and Defined Settlement Boundaries as a mechanism for identifying where certain development management policies apply (Essex County Council)
- Discounted market sales housing should remain at a discount for future eligible households. Clarification needed on the areas that are defined as local (Great Baddow Parish Council).

Summary of General Consultees Comments:

- Support for the suggested housing requirement (L&Q)
- Support for the housing requirement and 20% supply buffer (Home Builders Federation)
- Unmet needs from other Essex Authorities need to be considered (Home Builders Federation)
- Would like to see a bottom-up approach to identifying and meeting housing needs with villages being encouraged to meet their own needs though small sites. Community Land Trusts, rural exception sites and the 1 hectare sites mentioned in the document could help to deliver this approach (North West Parishes Group)
- Increasing the buffer will not necessarily lead to developments being achieved for specific groups in need (North West Parishes Group)
- There is less of a need for a 20% buffer with the Standard Method being in place (North West Parishes Group)
- 10% of the housing requirement being on small sites could be higher to support small and medium builders (Home Builders Federation)

- Allocation of affordable housing sites adjacent to DSBs may help manage landowner's expectations of land values. However, this would be housing for general needs and could be in conflict with the benefits that rural exception sites bring to the local community (CHP)
- Affordable housing on sites outside of DSBs should continue to come forward under the Council's standard Affordable Housing policy (L&Q)
- Any changes to the current requirements for 35% affordable housing split 63:37 affordable rent to affordable home ownership needs to be robustly viability tested and allow for flexibility to account for specific site and design constraints and opportunities (L&Q)
- Encourage consideration of what other exemption policies could apply, to allow provision of other affordable tenures on sites otherwise contrary to the development plan such as for other affordable tenures, as highlighted at 5.66 (L&Q)
- Specific allocations should be made to meet the needs of identified SRA and the need for older persons accommodation should be in the policy itself not in supporting text alone (Home Builders Federation).

Summary of Developer/Landowner/Agent Comments:

- The additional 54 additional dwellings on the 946 per annum in the Standard Method is not clearly explained or justified. The final housing requirement needs to be robustly evidenced (Martin Grant Homes, Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern), Bellway Strategic, Bellway Homes Ltd)
- Support the approach to provide above the minimum local housing needs figure calculated using the standard method (Gleeson Land, Croudace Homes, Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern), Dandara, Dandara Eastern, Dominvs Group, Obsidian Strategic Asset Management Ltd, Bolton, S&D, Persimmon Homes, Mr Alexander Micklem, Grosvenor Property UK and Hammonds Estates LLP, Bellway Strategic, Tritton Farming Partnership LLP, Medical Services Danbury, Mr J Bollingbroke, Marden Homes Ltd, Sempra Homes Ltd, Mr A Smith, Crest Nicholson, Richborough Estates, Hill Residential Ltd, Graham Dines, Miscoe Enterprises Ltd, The Bucknell family, A.G.&P.W.H Speakman, Chris Buckenham, Cliffords Group and Mr Mark Peters, Cliffords Group Ltd, Bellway Homes Ltd, Gladman Developments Ltd, Ptarmigan Chelmsford A Limited)
- The final housing requirement figure and resultant policies will need to demonstrate they are "flexible enough to accommodate needs not anticipated in the plan….and to enable a rapid response to changes in economic circumstances" (Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern), Gleeson Land)
- Consideration of a higher housing requirement to meet the needs of specific groups is supported (Gleeson Land, Grosvenor Property UK and Hammonds Estates LLP, Bellway Strategic)
- Unmet needs from other Essex Authorities and London should be considered in the SHMA and may need to be accommodated by CCC (Obsidian Strategic Asset Management Ltd, Bellway Strategic, Tritton Farming Partnership LLP, Medical Services Danbury, Mr J Bollingbroke, Marden Homes Ltd, Sempra Homes Ltd, Mr A Smith, Crest Nicholson)

- Unclear at this stage whether the housing numbers identified adequately takes account of jobs growth given updated evidence on the employment needs of Chelmsford are yet to be published (Pigeon (Sandon) Ltd)
- Support to continue the 20% supply buffer (Taylor Wimpey, Gleeson Land, Croudace Homes, Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern), Vistry Group, Dandara, Dandara Eastern, Wates Developments Ltd, Sedum Ltd, Dominvs Group, The Howgego Trust, Obsidian Strategic Asset Management Ltd, Bolton, S&D, Mr Alexander Micklem, Tritton Farming Partnership LLP, Medical Services Danbury, Mr J Bollingbroke, Marden Homes Ltd, Sempra Homes Ltd, Mr A Smith, Crest Nicholson, Hill Residential Ltd, Graham Dines, Miscoe Enterprises Ltd, The Bucknell family, A.G.&P.W.H Speakman, Chris Buckenham, Cliffords Group and Mr Mark Peters, Cliffords Group Ltd, H R Philpot & Sons, C J H Farming Ltd, Pigeon (Sandon) Ltd, Inspired Villages, Rosehart Properties Ltd, Gladman Developments Ltd, Pembridge Land Group, Ptarmigan Chelmsford A Limited, Richborough Estates)
- Do not support the 20% supply buffer (Taylor Wimpey Strategic Land)
- A higher buffer maybe able to be considered to account for affordability issues, London and surrounding authority's needs, and deliverability etc 20% should be the minimum (Tritton Farming Partnership LLP, Crest Nicholson, Pembridge Land Group, H R Philpot & Sons, C J H Farming Ltd, Mr and Mrs Richard and Sally Speakman, Medical Services Danbury, Mr J Bollingbroke, Marden Homes Ltd, Sempra Homes Ltd, Mr A Smith, Rosehart Properties Ltd, Croudace Homes)
- Endorse a proposed 10% buffer in supply of sites in the first five years (Miscoe Enterprises Ltd, A.G.&P.W.H Speakman, Chris Buckenham, Cliffords Group and Mr Mark Peters, Cliffords Group Ltd, Aquila Developments Ltd)
- SHMA needs to consider economic growth and job creation targets may drive the need for additional housing growth (Martin Grant Homes)
- SHMA needs to consider Affordable Housing need (Martin Grant Homes)
- Support the need for the SHMA to help inform the Plan (Bolton, S&D, Bellway Strategic, Richborough Estates, H R Philpot & Sons, Bellway Homes Ltd)
- Need for flexibility in housing mix policy and implementation to allow for changes in circumstances where current needs are considered to be different from those identified in the SHMA (Aquila Developments Ltd)
- DM1 needs to make a distinction between greenfield strategic allocations with individual housing plots and complex urban developments based around apartment typologies (Dominvs Group)
- Support exploring whether a different approach to the mix of market housing and whether the level, type and mix of affordable housing needs to change (Grosvenor Property UK and Hammonds Estates LLP)
- Policies with too precise a development mix run the risk of becoming rapidly out of date and inflexible to changes in housing need (Dominvs Group, Gleeson Land)
- Mix of market housing should be considered on a site-by-site basis to ensure the delivery of homes is appropriate for the immediate demographic and locational context (Chelmsford Garden Community Consortium)
- Any build to rent/single family housing policy needs to be addressed in the review with an evidence base that supports the tenure requirements. This

needs to be considered early on in any housing assessment evidence base (Chelmsford Garden Community Consortium, Dominvs Group)

- A robust assessment of affordable housing mix, in particular First Homes, should be undertaken. This should review the financial viability implications, as well as the impact on the availability of Shared Ownership units (Chelmsford Garden Community Consortium)
- Numbers in the 2022 Housing Trajectory do not appear to tally with the numbers of completions, allocations, permissions and windfalls in the document (Martin Grant Homes)
- Average past annual delivery rates do not appear to justify the high annual delivery rates projected in the Housing Trajectory (Martin Grant Homes)
- Housing Trajectory published does not include a detailed breakdown of all sites it relies upon. This should be included (Martin Grant Homes)
- The components of the housing supply will need to be fully evidenced and justified (Vistry Group)
- There is no updated housing land supply evidence to justify the absence of exceptional circumstances for a Green Belt Review (Taylor Wimpey Strategic Land)
- Support for the identification of small windfall sites to help meet the overall housing need (London & Cambridge Properties Ltd)
- An over-reliance on large strategic scale sites may jeopardise the projected delivery rates over the Plan period (Dandara)
- Potential for a higher housing figure to deliver the amount of Affordable Housing needed is supported (Gleeson Land, Aquila Developments Ltd)
- New sites need to ensure they can viably provide the amount of Affordable Housing needed (Gleeson Land)
- Concern if the overall percentage requirement for affordable housing increases above existing thresholds without robust evidence and viability testing (Ptarmigan Chelmsford A Limited)
- Amending the threshold for Affordable Homes to 10 dwellings, as set out in national policy is supported (Bellway Strategic)
- Any policies that exceed national policy expectations e.g. housing mix and tenure must be justified and fully tested in the evidence base, including in need and viability assessments (Taylor Wimpey)
- Support approach to identifying needs of different groups, including elderly people, and land to meet these needs (Sedum Ltd, Grosvenor Property UK and Hammonds Estates LLP)
- Specific allocations for all forms of elderly persons accommodation, including affordable, should be made in the Plan to ensure certainty to meet identified needs (Sedum Ltd)
- DM1 does not sufficiently cover SRA. Any equivalent new policy must be based on a robust evidence base that identifies the housing requirements of specialist housing for older people and distinguishes between C3 and C2 (Inspired Villages)
- The Plan should include a housing requirement figure for designated neighbourhood areas, unless site allocations are made in the Local Plan, as it is not reasonable for sites in such settlements to be identified through the Neighbourhood Plan process due to the time these take (Landvest Developments Ltd, Richborough Estates, Obsidian Strategic Asset Management Ltd, Stonebond (Chelmsford) Ltd, Vistry Group)

- Support allocating smaller sites to deliver at least 10% of the housing requirement (Landvest Developments Ltd, Edward Gittins Associates, Mr Alexander Micklem, Cliffords Group Ltd)
- Consider increasing the smaller sites requirement to 15% of the housing requirement (Miscoe Enterprises Ltd, H R Philpot & Sons, C J H Farming Ltd)
- Providing a mix of sites, including small and medium, will help the supply in meeting the needs of different groups, as well as providing a more robust approach to maintaining delivery (Wates Developments Ltd, Bellway Strategic, Stonebond Properties Ltd, Bellway Strategic, Stonebond (Chelmsford) Ltd)
- Reference to and the allocation of medium size sites should be made (Rosehart Properties Ltd, Pembridge Land Group, Croudace Homes)
- Support identifying developable sites or broad locations for growth over years 6-10 and 11-15 of the plan period allowing larger sites to come forward later in the trajectory (Miscoe Enterprises Ltd)
- Agree with the key outputs listed in para 5.56 of the document (A.G.&P.W.H Speakman, Chris Buckenham, Cliffords Group and Mr Mark Peters, Cliffords Group Ltd, Rosehart Properties Ltd)
- Disagree with having affordable housing on the edge of DSBs as it could lead to exclusion (Bellway Strategic)
- Include policies to encourage housing in the city centre and supportive polices for Build-to-Rent homes (Dominvs Group)
- A Green Belt Review is needed to meet needs (Taylor Wimpey Strategic Land, Vistry Group, Rosehart Properties Ltd, Charterhouse Property Group & Charterhouse Strategic Land, Pembridge Land Group)
- A review of Green Wedges is needed to allow for some development within them (Obsidian Strategic Asset Management Ltd).

Summary of Public Comments:

- Unclear how the overall number of new homes and existing built or planned homes is derived
- The number of new homes being built is too many and there is too much loss of open countryside to facilitate them
- People need to consider living elsewhere if there are no homes available or they cannot afford to live in the area
- All unoccupied homes should be considered
- Affordable housing should be in the context of buying using local salaries for local jobs, not local salaries for jobs in London
- Affordable homes should be built to the same standard as all houses
- More affordable homes are needed
- Can anything be done to assist people in getting a deposit for a home?
- There should be no first homes exceptions
- The wait list for affordable rented housing is much too long
- Support for small sites for affordable homes outside DSBs for local people
- The 20% buffer and all other types of housing required need to be balanced against the requirements of other strategies of the Council, e.g sustainability; protecting the natural environment, etc

- 1,000 homes per year plus a 20% supply flexibility buffer means an increase to nearly 27% on the new minimum which seems excessive, and it is unclear how it is justified
- The city's infrastructure cannot take more homes and the provision of housing is not in line with infrastructure needs or provision, which need to be provided alongside the housing
- There is no detail on how any of the points raised in the NPPF on Rural Housing will be addressed
- Older people should be identified as a specific group in the SHMA and have specific allocations made to address this groups needs rather than wrapped up in SRA
- M4 housing should not be regarded as an alternative to delivering the necessary amount of SRA as it does not deliver on the many wider benefits, such as addressing issues of loneliness and social isolation
- DM1 (c) is far too restrictive and does not allow support for one off SRA developments on the edge of DSBs
- All developments of 50+ should include down-sizing for older people
- Policy needs to be flexible to encourage the delivery of older peoples housing in sustainable and well-connected locations
- The need for student accommodation should be considered
- Building within gardens should not be dismissed as the local facilities are often in place to sustain them
- The volume of planning applications in rural areas is becoming unmanageable
- Look at plots for modular housing that can relatively quickly be made available
- Consider higher density development.

Our evidence says
The Strategic Housing Needs Assessment (SHNA) (2023) studies the overall housing need set against the NPPF and the framework of National Planning Practice Guidance, specifically the Standard Method for assessing housing need. It shows a need for 955 dwellings per annum based on household growth of 631 per annum and an uplift for affordability of 51%.
The SHNA (2023) considers whether there are exceptional circumstances to move away from the Standard Method in either an upward or downward direction. The assessment considers whether more recent demographic trends, including 2021 Census data and ONS mid-year population estimates up to 2021 are substantially different to the 2014-based projections. The assessments notes that whilst there are differences these are not considered to be substantial and do not point to any exceptional circumstances.
The SHNA (2023) reviews past build rates as areas with strong growth might be able to provide more homes than the Standard Method. Whilst delivery has been strong in Chelmsford, the assessment concludes that past build rates do not provide any evidence to suggest a higher or lower figure than the Standard Method.
The Standard Method projection was used to look at potential changes to the resident labour supply and the number of additional jobs that might be supported. Overall, it was projected the labour supply would increase by around 21% over the 2022-41 period and that this could support around 21,000 additional jobs – this is above an economic forecast (just over 12,400 jobs for the same period) and again

Our evidence says
points to there being no need to plan for housing in addition to the Standard Method.
The SHNA (2023) suggests a need for 623 affordable homes per annum across the City Council area. The assessment concludes that whilst there is a notable need for affordable housing, and provision of new affordable housing is an important and pressing issue in the area, this high figure does not point to any requirement for the Council to increase the Local Plan housing requirement as many of those assessed as having an affordable housing need are already in housing and therefore do not generate a net additional need for a home.
The SHNA (2023) sets out that there are a range of factors which will influence demand for different sizes of homes, including demographic changes; future growth in real earnings and households' ability to save; economic performance and housing affordability. In all sectors the analysis points to a particular need for 2-bedroom accommodation, with varying proportions of 1-bedroom and 3+-bedroom homes. For rented affordable housing there is a clear need for a range of different sizes of homes, including 40% of general needs housing to have at least 3-bedrooms.
In terms of specific housing needs other than affordable housing, the SHNA (2023) notes that the older person population is projected to increase notably moving forward. The assessment concludes that an ageing population means that the number of people with disabilities is likely to increase substantially.
The SHNA (2023) has not attempted to estimate the need for additional private rented housing. It is likely that the decision of households as to whether to buy or rent a home in the open market is dependent on several factors which mean that demand can fluctuate over time; this would include mortgage lending practices and the availability of Housing Benefit.
The Local Plan Viability Report (2023) tests the high-level viability of different typologies of development sites that could come forward through Local Plan allocations through multiple development appraisals. Several sets of appraisals have been run, including a varied affordable housing requirement, varied levels of environmental standards and varied developer contributions. The appraisals use the residual valuation approach. They assess the value of a site after considering the costs of development, the likely income from sales and/or rents and a developers' return. The Residual Value represents the maximum bid for the site where the payment is made in a single tranche on the acquisition of a site. For the proposed development to be viable, it is necessary for this Residual Value to exceed the Existing Use Value (EUV) by a satisfactory margin, being the Benchmark Land Value (BLV).
The Base appraisals in the Local Plan Viability Report (2023) reflect the Council's current policy requirement, updated for national changes. These show that across the greenfield sites, the Residual Value exceeds the BLV in all cases, suggesting that such development is likely to be viable on the basis tested. On brownfield sites within Chelmsford and the wider Borough, the Residual Value is generally above the BLV, suggesting that such development is likely to be viable. The exception is in relation to flatted development which is most likely to come forward in central Chelmsford. This is not shown as viable with the Residual Value being less than the BLV, and for the higher density typologies, less than the EUV. Whilst the value attributed to flatted development is significantly greater than for housing development, this is more than offset by the greater costs associated with flatted

Our evidence says

development and the necessity to reflect the circulation space (stairs and lifts) in the modelling. The values in the South Woodham Ferrers areas are less than in the wider Borough and the Residual Values are proportionately less than in the wider Borough. In this area greenfield development is shown as viable but brownfield development (housing and flats) is not.

The Local Plan Viability Report (2023) modelling includes the 7 potential strategic sites. On all these the Residual Value exceeds the BLV suggesting that these are likely to be forthcoming.

The Local Plan Viability Report (2023) appraisals assume developer contributions and CIL. On the potential strategic sites, these vary from £25,000 per unit to £50,000 per unit (in addition to Community Infrastructure Levy (CIL)). As and when the actual strategic sites are identified and modelled, it will be necessary to test them against their strategic infrastructure and mitigation requirements identified through the Infrastructure Delivery Plan (IDP).

Sets of appraisals in the Local Plan Viability Report (2023) have also been run to establish the costs of the additional policy requirements. The starting place for this analysis is the recent and emerging national standards, including the 2025 increase to Part L of Building Regulations, the mandating of Accessible and Adaptable standards under Part M of Building Regulations, mandatory Electric Vehicle Charging and the Council's requirement for 20% biodiversity net gain. The analysis shows that, on average, assuming 35% affordable housing, across the typologies, the Residual Value is about £110,000/ha less where the affordable housing for rent is provided as Social Rent rather than Affordable Rent. The consequence of this is that should the Council seek that all the affordable housing for rent is as Social Rent, the developer could typically afford to pay a landowner about £110,000/ha less than where the affordable housing for rent is as Affordable Rent. This is a significant difference that has the impact of reducing the scope for affordable housing provision by about 5%, although the impact varies considerably across the different typologies.

In the Local Plan Viability Report (2023) a range of developer contribution costs ranging from £0 to £60,000 per unit has been tested against 0% to 45% affordable housing requirements.

In the Local Plan Viability Report (2023) the effects of affordable housing and developer contributions are tested in three scenarios:

	Lower Requirements	**Mid Requirements**	**Higher Requirements**
	Being as per the minimum existing and emerging national standards		Including most of the items tested
Biodiversity Net Gain	10%	20%	20%
Carbon and Energy	2025 Part L	Zero Carbon	Zero Carbon

Our evidence says

Accessibility	100% M4(2) Accessible & Adaptable	95% M4(2) - Accessible & Adaptable 5% M4(3)a Wheelchair Adaptable	95% M4(2) Accessible & Adaptable 5% M4(3)b Wheelchair Accessible
Water Standard	Enhanced Building Regulations	Enhanced Building Regulations	Enhanced Building Regulations with Rainwater Harvesting
CIL	As adopted	As adopted	As adopted

The amount of development required during the Plan period can be accommodated outside of the Green Belt so there is no need to carry out a Green Belt review. This accords with national policy and guidance.

The Green Wedge evidence base reports support the policies in the Preferred Options Local Plan and notations on the draft Policies Map for the Green Wedge.

The Preferred Options IIA 2024 considers that the approach would meet in full, and exceed, the assessed housing requirement over the Plan period, in accordance with the objective of the NPPF to boost supply. Overall, the development requirements are expected to have a significant positive effect on housing.

The Equality Impact Assessment (EqIA) conducted as part of the Preferred Options IIA 2024 records positive effects of policies relating to housing types and affordability options to meet the needs of protected groups including the disabled, young and elderly people.

The Preferred Options Local Plan

Policy S6 (Housing and Employment Requirements) has been assessed using the Standard Method and the SHNA (2023) has affirmed that this is a reasonable assessment of housing need for Chelmsford. The Standard Method calculation varies each year and has averaged 953 homes per annum since the publication of the formula in 2018. To plan to meet only the minimum local housing need figure produced by the Standard Method would not significantly boost the supply of homes. The City Council declared a housing crisis in Chelmsford in February 2022 and levels of homelessness continue to rise. Consequently, the Council proposes a Housing Requirement figure of 1,000 homes per annum for the plan period 2022-2041 to address the variation in the calculation of the Standard Method and the rising levels of homelessness within the administrative area of the City Council.

Policy S6 (Housing and Employment Requirements) includes a supply buffer of 20% to provide flexibility in the supply of housing sites. Provision is made for 22,567 new homes during the period 2022-2041 however when allowance is made for existing housing completions, existing planning permissions, existing Local Plan allocations to 2036 and windfall projections the residual new Local Plan Allocations for the period to 2041 is 3,862 new homes. The range of site allocations, including new sites, is set out in Policy S7 (The Spatial Strategy).

There are four designated neighbourhood areas with plans in progress. The Preferred Options Local Plan continues to set out a housing requirement of 100 new dwellings for Danbury designated neighbourhood area. Broomfield and

The Preferred Options Local Plan
Boreham are not being considered for new housing growth in the preferred Spatial Strategy. East Hanningfield does fall within the overall strategy options for growth but a housing requirement has not been requested by the Neighbourhood Plan body.
Policy S7 (The Spatial Strategy) provides information on the proposed location of the housing required and the range of site types.
Policy S7 (The Spatial Strategy) continues to include a housing supply buffer of close to 20% to meet the housing requirement. This is justified as previous Plan periods in Chelmsford have included a similar supply buffer but there has been no oversupply of housing.
Policy S7 (Spatial Strategy) provides support for residential development on private residential gardens where development would not cause harm to the local area and where they are in accordance with other relevant policies of the plan.
Policy DM1 (Size and Type of Housing) provides the range of housing required taking into account demographic change. The percentage range provides greater flexibility on individual sites and the Reasoned Justification acknowledges site location and area character are also relevant consideration when negotiating the mix of housing types on individual development sites.
The SHNA 2023 follows the approach set out in the latest published National Planning Policy Framework (NPPF) and supporting Planning Practice Guidance (PPG).
Policy DM1 (Size and Type of Housing) increases the requirement for new dwellings to achieve requirement Part M, Category 2 (Accessible and adaptable dwellings) M4(2) of Schedule 1 (para 1) to the Building Regulations 2010 (as amended) to create sustainable developments for the future as well as address the findings of the SHNA (2023) that an ageing population means that the number of people with disabilities is likely to increase substantially.
Policy DM1 (Size and Type of Housing) does not specifically address Build to Rent schemes as the Local Plan Viability Report (2023) shows flatted development of this type is not viable and the SHNA notes that the need for additional private rented housing is dependent on several factors including mortgage lending practices and the availability of Housing Benefit, which fluctuate over time.
Policy DM1 (Size and Type of Housing) maintains the same approach to custom- and self-build housing in line with the recommendations in the SHNA (2023).
Policy DM1 (Size and Type of Housing) provides a flexible way to meet a range of Specialist Residential Accommodation needs. The application of this policy will refer to the latest assessments of local housing need to prioritise the greatest housing need for Specialist Residential Accommodation within the plan period. The increase in the requirement for new dwellings to achieve requirement Part M, Category 2 (Accessible and adaptable dwellings) M4(2) of Schedule 1 (para 1) to the Building Regulations 2010 (as amended), will help to address the fact that the number of people with disabilities is likely to increase substantially with an ageing population for those older persons that do not wish to live in Specialist Residential Accommodation.
Policy DM2 (Affordable Housing and Rural Exception Sites) retains a requirement for the provision of 35% of the total number of residential units to be provided as affordable housing consisting of 70% affordable rent capped at Local Housing Allowance levels, 25% First Homes provided at the 30% discount against market

The Preferred Options Local Plan
value and the balance as shared housing. This equates on a whole site basis to 24.5% affordable rent, 8.75% First Homes and 1.75% shared ownership housing. The threshold has been reduced to comply with the NPPF definition of Major Development. The Local Plan Viability Report (2023) demonstrates that the threshold and the amount and type of affordable housing is justified.
Policy DM2 (Affordable Housing and Rural Exception Sites) includes a requirement for a specific mix of affordable homes for rent to meet the needs identified in the SHNA (2023).
National Policy - Policy DM2 (Affordable Housing and Rural Exception Sites) includes three exceptional circumstances in which small sites will be released for housing that would not otherwise be released for housing, to accord with the NPPF. The rural housing exception site part of the policy is linked to locations that are determined by The Housing (Right to Acquire or Franchise) (Designated Rural Areas in the East) Order 1997 (SI 1997/623) and The Housing (Right to Enfranchise) (Designated Protected Areas) (England) Order 2009 (SI 2009/2098).
The Planning Obligations SPD will be reviewed, and any appropriate changes/additions included. This will include additional text from some of the published Planning Advice Notes.
The Planning Advice Notes that provide more detailed housing needs information will be reviewed and updated as appropriate.
Further information on the approach to housing is set out in the Preferred Options Housing Topic Paper.

Gypsy and Traveller Accommodation

Key statistics:

Question	Yes	No	Comments	Total number of responses
33. Do you support the approach being taken? If you disagree, please explain why?	18	6	14	38
34. Do you have any views on the Council's current Gypsy, Traveller and Travelling Showpeople policies and the decisions they lead to?	N/A	N/A	16	16
35. Have we missed anything? Where possible, please support your answer with reference to any evidence.	N/A	N/A	10	10

Summary of Specific and DTC consultees comments:

- Support for the approach and expect CCC to meet its own accommodation needs for this group through appropriate allocations (Essex County Council, Braintree District Council, Great Waltham Parish Council)
- If any needs are not able to be met CCC would need to follow the Essex Planning Officers' Association (EPOA) Mechanism for the consideration of Unmet Gypsy and Traveller Need (2018)) as would any authority seeking CCC to accommodate any of its unmet need for this group (Essex County Council)
- Consideration should be given to the allocation of sites outside of residential growth allocations provided they are in sustainable locations (Braintree District Council)
- More specific reference to the need for Transit sites may be needed (Braintree District Council)
- A better explanation of para 8.24 of the existing Plan is required for Policy DM3 (South Woodham Ferrers Town Council).

Summary of General Consultees Comments:

- A new Gypsy and Traveller Accommodation Assessment (GTAA) needs to be undertaken as it is out of date (The Showmen's Guild of Great Britain London and Home Counties)
- Welcome new sites being included within new strategic allocations but request that local Showpeople and local residents, as well as the Guild are involved in the design to ensure they provide suitable sites (The Showmen's Guild of Great Britain London and Home Counties)
- A positive criteria-based policy approach towards other sites, outside strategic allocations, is also needed (The Showmen's Guild of Great Britain London and Home Counties)
- Consider taking sites out of the Green Belt where they are not of great Green Belt value (The Showmen's Guild of Great Britain London and Home Counties)
- Welcome a review of the needs for this group and the allocation of sites (CHP).

Summary of Developer/Landowner/Agent Comments:

- Additional requirements to accommodate this groups needs within new residential allocations needs to be the subject of appropriate needs and viability testing (Taylor Wimpey)
- Question the appropriateness of continuing to include provision for this group within strategic allocations and suggests specific standalone site allocations are made outside of the strategic allocations instead (Obsidian Strategic Asset Management Ltd, Gleeson Land)
- Objection to the allocation and planning permission granted at Drakes Lane (W & H Marriage & Sons Limited).

Summary of Public Comments:

- Important for the Council to provide for these groups
- The Council should engage with these groups as part of the Local Plan process
- Impact on surrounding local residents from such sites needs to be considered
- Suggest a site outside of strategic allocations would be more suitable and developers could pay towards funding it
- There is a lot of NIMBYism to proposed sites
- There is a need for more suitable short-term and longer-term sites, properly equipped/serviced
- Unfamiliar with the demand for accommodation for these communities.

Our evidence says
The provisional findings of the Gypsy and Traveller Accommodation Assessment (2024) that covers the period 2023 to 2041 identifies a need for a range of between 36 and 77 Gypsy and Traveller pitches and 25 Travelling Showpeople plots within Chelmsford.
The need for transit sites has not yet been established and will be confirmed when the Essex wide Gypsy and Traveller Accommodation Assessment (2024) has been completed for all the Essex authorities.
The Preferred Options IIA 2024 considers that the approach would the requirements for Gypsies and Travellers and Travelling Showpeople over the Plan period. Overall, the development requirements are expected to have a significant positive effect on housing.

The Preferred Options Local Plan
Policy S6 (Housing and Employment Requirements) reports the provisional findings of the Gypsy and Traveller Accommodation Assessment (2024) for Chelmsford. The Reasoned Justification notes that the Council will expect to see Gypsy and Traveller Pitches and Travelling Showpeople accommodation provided on all suitable large strategic development allocations.
Policy S7 (The Spatial Strategy) provides information on the proposed location of 30 Gypsy and Traveller pitches and 25 Travelling Showpeople plots.
Policy DM1 Cii (Size and Type of Housing) requires the provision of Specialist Residential Accommodation within all development of more than 100 dwellings. This includes gypsy and traveller needs identified in the Gypsy and Traveller Accommodation Assessment (2024) and not met through site allocations.
A criteria-based approach already exists in Policy DM3 (Gypsy, Traveller and Travelling showpeople sites, which includes considerations such as a suitable living environment, service provision, no adverse impact on the amenity of nearby residents and safe/convenient vehicular access.
The Planning Obligations SPD will be reviewed, and any appropriate changes/additions included.
The Travelling Showpeople Sites Planning Advice Note that provides advice on the design and layout of Travelling Showpeople provision will be reviewed to determine if it should be incorporated in the Planning Obligations SPD.

The Preferred Options Local Plan
Further information on the approach to Gypsy and Travellers and Travelling Showpeople is set out in the Preferred Options Housing Topic Paper.

6 Fostering growth and investment and providing new jobs

Jobs/Employment and Economic Growth

Key statistics:

Question	Yes	No	Comments	Total number of responses
36. Do you support the approach being taken? If you disagree, please explain why?	28	4	23	55
37. Do you have any views on the Council's current employment policies and the decisions they lead to?	N/A	N/A	17	17
38. Do you have any views on the key economic and employment related issues identified so far?	N/A	N/A	27	27
39. Have we missed anything? Where possible, please support your answer with reference to any evidence.	N/A	N/A	24	24

Summary of Specific and DTC consultees comments:

- Support expressed in general for the approach (Essex County Council, Braintree District Council, Basildon Borough Council, Brentwood Borough Council, Rochford District Council, South Woodham Ferrers Town Council, Writtle Parish Council, Broomfield Parish Council, Rochford District Council, Great Waltham Parish Council)
- The issue 'Allocating additional employment space to meet future needs' should be expanded to clarify that quality is as important as quantity. Existing employment sites should not simply be rolled forward particularly where there is no reasonable prospect of particular sites being used for such purposes (Essex County Council)
- The Town and Country Planning Association's (TCPA's) Garden City Principles should continue to be integral to the more detailed design of Chelmsford Garden Community (Essex County Council)
- The plan is Chelmsford City Centre focused with no mention of South Woodham Ferrers which is receiving the highest proportion of residential growth but negligible employment opportunities, leading to higher levels of commuting (South Woodham Ferrers Town Council)

- Policy DM4 should be revised to refer to the need for affordable start-up accommodation, Policy DM23 should require the Essex Design Quality Review Panel to be used for large employment areas, and Policy DM24 should make it clear that the principles listed which all new major development should reflect relate to employment uses as well as residential developments (Essex County Council)
- Paragraphs 5.73 and 5.77 which refer to various sector specialisms lacks commentary on typical occupier needs (Essex County Council)
- CCC should consider the need to remove permitted development rights to help retain new employment space in the longer term. Provision of employment along strategic transport networks such as the A12 should also be supported (Braintree District Council)
- Sites to meet local business and community needs in rural areas may have to be located adjacent to or beyond existing settlements. Decisions should exploit opportunities to make a location more sustainable and the use of previously developed land, and sites physically well-related to existing settlements should be encouraged (Essex County Council)
- Economic development should integrate smoothly in rural areas without disrupting its existing character such as small businesses operating former agricultural premises (Great Waltham Parish Council)
- The plan needs to ensure that rural areas are supported by both the fastest broadband possible and EV charging facilities (Great Waltham Parish Council)
- Home working and internet connectivity needs to be considered as part of the review (see the Digital Strategy for Essex) and issues relating to viability should be considered in the employment needs study to be commissioned (Essex County Council)
- The role of agriculture and rural businesses in the local economy and opportunities for residents to establish micro-businesses and work from home should be emphasised (Chignal Parish Council)
- Village halls may have a role in supporting homeworking by providing affordable meeting rooms for home workers, to enable networking and reduce the danger of social isolation (Broomfield Parish Council)
- More emphasis is needed on supporting the green economy and better incentives to encourage retrofitting and adapting existing buildings to reduce heat-loss and energy (South Woodham Ferrers Town Council)
- The review should address the need for economic growth and job creation, and to take account of and seize opportunities to grow the linkages between the Chelmsford economy and the South Essex economy. Relevant projects are the Thames Freeport and Lower Thames Crossing, which are likely to create both direct and indirect growth in jobs and supply chains beyond the boundaries of South Essex (Brentwood Borough Council, Rochford District Council)
- Thames Freeport needs to be reflected in the Local Plan. Joint working between The Association of South Essex Local Authorities and CCC is necessary (Castle Point Borough Council).

Summary of General Consultees Comments:

- General support expressed for the approach (Newlands Springs Residents Association, Chelmer Housing Partnership).

Summary of Developer/Landowner/Agent Comments:

- Support expressed in general for the approach (C J H Farming Ltd, Dominvs Group, Hill Farm (Chelmsford) Ltd, Cliffords Group Ltd, David Lloyd Leisure and Aquila Development Ltd, Rosehart Properties Ltd, Pembridge Land Group, Gray & Sons, Gladman Developments Ltd, Taylor Wimpey, Grosvenor Property UK and Hammonds Estates LLP, Gray & Sons, Mr & Mrs Andrew Parker
- Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (Tritton Farming Partnership LLP)
- Additional emphasis needed on Chelmsford City Centre as being a key economic driver for employment for which growth should be directed (Dominvs Group)
- Allocate sufficient sites with good access to the strategic road infrastructure and accessible by sustainable modes of travel (Tritton Farming Partnership LLP)
- Provide choice and flexibility in allocating a wide range of employment opportunities in Chelmsford in proximity to housing (Rosehart Properties Ltd)
- A holistic approach to be encouraged for the provision of employment opportunities in tandem with childcare, housing, local facilities and services, in order to facilitate easier working patterns for all (Grosvenor Property UK and Hammonds Estates LLP
- Employment policies should be coordinated to ensure that homes are located in areas with easy access to jobs and public transport, therefore development within the city centre should be encouraged as part of the overall economic strategy (Dominvs Group)
- The almost exclusive focus on strategic sites to meet employment requirements fails to secure much needed new floorspace and delays its delivery. Allocations need to be significantly more flexible in scale and type to secure the full range of employment opportunities (Aquila Developments)
- Employment policies should provide choice and flexibility in allocating a wide range of employment opportunities in Chelmsford. There should be clear links between development and the provision of jobs. Sites should be prioritised that would be directly accessible to employment provision thus not reliant on the car for commuting consistent with the NPPF (Wates Development Limited)
- Support for the role of Chelmsford Garden Community (CGC) in boosting and securing economic growth, by the development of new employment floorspace as an integral part of the CGC masterplan (Ptarmigan Chelmsford A Limited)
- Support CCC's aim to promote economic growth including concentrating large new scale employment development sites as part of strategic new development sites on the edge of Chelmsford Urban Area (Taylor Wimpey)
- Economic growth should be supported in the towns and villages, as well as the city and the rural areas (Obsidian Strategic Asset Management Ltd)
- It is critical to ensure that adequate job opportunities and provision of employment generating uses/development come forward outside of the main

city centre and urban area capturing local demand amongst rural communities, this should be reflected in the development strategy (Cliffords Group Ltd, David Lloyd Leisure and Aquila Development Ltd)

- CCC should bring forward environmental benefits, green infrastructure and BNG through certain economic uses that are harmonious with the countryside, such as garden nurseries and tree planting (Cliffords Group Ltd)
- Local economic policy should seek to positively enhance the quality of jobs for the local community and empower hard to reach groups (Dominvs Group)
- Policies currently lack reference to enable business uses particularly outside of DSBs or allocated employment areas in line with the NPPF (Mr N Halls)
- Policies currently play insufficient attention to the requirement for conventional industrial / distribution shed space which previous studies have recognised in their aspiration for either neighbourhood integration of Small and Medium Sized Enterprises (SMEs) or attraction of high technology sectors (Aquila Developments)
- Due to current trends in post-Covid working practice, new homes should provide specific space for homeworking and high-speed internet (Pembridge Land Group)
- The needs of the logistics sector are not acknowledged in Policy S8, hence there is a lack of allocated sites to meet the needs of this growing sector. Opportunities should also be sought along the strategic road network outside Chelmsford administrative area as part of e.g. Essex Economic Board and London (Greystoke CB)
- The delivery of leisure facilities can also be valuable sources of employment by offering a diverse range of job opportunities especially where they have a mix of ancillary uses such as retail, food and drink supporting the core leisure uses (Cliffords Group Ltd, David Lloyd Leisure and Aquila Development Ltd)
- There is no detail in the consultation document of the flexible rolling employment land supply across the plan period as indicated in the IIA (5.4.2) (Tritton Farming Partnership LLP)
- Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (Writtle University College).

Summary of Public Comments:

- Some general support for the proposed approach
- Focus is on small employers; how will large employers be supported?
- Support is needed to encourage businesses to set up and locate to Chelmsford. Hundreds of office blocks are empty because of high business rates and council tax
- Employment to be provided at all skill levels
- Need to recognise high number of residents commuting to London and not drive housing demand by building more business space
- Providing facilities where people from different businesses can share working spaces or premises as well as supporting services is good but also needs to include shared equipment like that found in “MAKERSPACE” or “HACKSPACE” facilities in Colchester and Southend
- Consider additional costs of home working (electricity and heating) and impact on mental well-being for solitary home workers. Work hubs would alleviate

some of these issues but having them only in the city centre would create a village/city divide
- Consider the lasting effect of the Covid lockdown on employment sites, working from home, hotelling/hotdesking
- The promotion and facilitation of future proof broadband is critical in attracting employers, and assisting new start-ups. Homeworking is more challenging without excellent connectivity
- It is hard to see how, in some areas, the 15/20 minute walk for residents to open spaces could be achieved with the planned industrial employment development
- Question if new industrial areas are required when we have many empty offices including a large building on Parkway
- Policies may not provide work nearby for the expanding Chelmsford
- Concern over lack of quantification of contribution of each policy
- Question how delivery will be funded
- Support for cottage based industries that may require extending their present home.

Our evidence says
The Employment Land Review 2023 considers the employment needs arising from economic and employment growth in Chelmsford to 2041. The review encourages the delivery of more industrial land across Chelmsford as a shortfall was identified through quantitative analysis.
The Employment Land Review 2023 reviews existing Employment and Rural Employment Areas and finds it reasonable for them to continue to be protected for employment uses. It also recommends that future Local Plan policy identify the need for infrastructure improvements across the main employment locations and future allocations to support the identified intensification opportunities on employment land.
National policy - A significant reform of The Use Class Order was announced in July 2020 with effect from September 2020. A new use class, a broad Use Class E (commercial, business and service), was formed merging the former Use Classes labelled A1, A2, A3, B1, B2, D1 and D2.
The Preferred Options IIA 2024 considers that the approach will have a significant positive effect in respect of the economy, which will help to maintain and enhance Chelmsford's strategic economic role, support existing businesses and attract inward investment.

The Preferred Options Local Plan
In line with the Employment Land Review 2023, new strategic employment development is promoted along strategic transport networks including the A12 – Policy SGS16a (East Chelmsford Garden Community) and Policy SGS16b (Land Adjacent to A12 Junction 18 Employment Area). New employment is also promoted in Chelmsford City Centre which is highly accessible by public transport. There are also two smaller allocations in the rural area meeting more local demand for employment floorspace.

The Preferred Options Local Plan
No new residential or employment site allocations are proposed for South Woodham Ferrers in the Preferred Options Local Plan over and above those allocated in the adopted plan.
Most existing designated Employment Areas and Rural Employment Areas are proposed to remain in employment use in line with recommendations in Employment Land Review 2023. Exceptions are Kay Metzeler, Brook Street and Marriages Mill, Hoffmans Way as these may no longer be viable for employment and are promoted for residential development in the Preferred Options Local Plan.
National policy - Policy S6 (Housing and Employment Requirements) and DM4 (Employment Areas and Rural Employment Areas) are updated to reflect changes to the Use Class Order including a new Use Class E(g), formerly Use Class B1.
Policy S8 (Delivering Economic Growth) introduces a requirement for Employment and Skills Plans for strategic scale proposals to improve local skills and access to employment opportunities. The policy is amended to reflect updated the employment growth sectors and to reflect the merger of Writtle University College and Anglia Ruskin University College.
Policy DM4 (Employment Areas and Rural Employment Areas) is updated with new/amended criteria to protect neighbouring uses and ensuring uses are appropriate to their location and not detrimental to the local transport network. The policy also promotes infrastructure improvements in designated employment areas, to reflect the Employment Land Review 2023, and sustainable and active travel opportunities.

Strategic Priorities for Place

7 Creating well designed and attractive places, and promoting the health and social wellbeing of communities

Community assets

Key statistics:

Question	Yes	No	Comments	Total number of responses
40. Do you support the approach being taken? If you disagree, please explain why?	27	3	22	52
41. Do you have any views on the Council's current community asset policies and the decisions they lead to?	N/A	N/A	16	16
42. Have we missed anything? Where possible, please support your answer with reference to any evidence.	N/A	N/A	18	18

Summary of Specific and DTC consultees comments:

- Needs to be more commitment to provision of community assets including primary schools, play areas and community centres for South Woodham Ferrers (South Woodham Ferrers Town Council)
- Retention of community facilities is supported (Braintree District Council)
- Consider role of Broomfield Hospital in the wider area including access by a variety of transport options from outside the authority's area (Braintree District Council)
- Strongly support ensuring sufficient school and nursery places are provided through either expanding existing or building new schools (Essex County Council)
- Adequate provision of complementary community assets is often an area for concern (Great Waltham Parish Council)
- New developments create additional pressure on local transport, educational, health and recreational assets. This can be a matter of timing, but there also seems to be an assumption of being able to take up a slack within current provisions which does not actually exist (Great Waltham Parish Council)
- Need to account for changing requirements in respect of community sports facility needs (Sport England)
- Council's evidence base on community sports facilities (both indoor and outdoor) is out of date (Sport England)
- Policy is not robust enough to protect community facilities (Writtle Parish Council)
- Provision of natural green space is encouraged in new developments (Natural England)
- Co-ordinate with the Local Nature Reserves Strategy (LNRS) as it develops (Natural England)
- New greenspace should follow the guidance in Suitable Alternative Natural Greenspace (SANG) (Natural England).

Summary of General Consultees Comments:

- Support (Newland Spring Residents Association).

Summary of Developer/Landowner/Agent Comments:

- Support for the proposed approach (Gray & Sons, Grosvenor Property UK and Hammonds Estates LLP, Dandara, Chelmsford Garden Community Consortium, Bellway Strategic)
- Approach accords with the NPPF (Dandara, Bellway Strategic)
- Support for the current policies (Dominvs Group, Mr Alexander Micklem)
- Supportive of CCC's intention to work with infrastructure providers such as ECC and NHS (Cliffords Group Ltd, Miscoe Enterprises Ltd, Mr Alexander Micklem)
- Welcome that the Council will seek to include relevant site allocation policies for community uses such as crematoriums (Gray & Sons)
- Support the broad principles of the existing policies and their retention in the new Local Plan (Dominvs Group)

- Refresh policies to reflect the updated Use Classes Order (Mr Alexander Micklem)
- Priorities and policies should encourage facilities based on local need and engagement (Wates Developments Limited)
- Developers should be empowered to co-ordinate delivery of infrastructure on adjacent or/adjoining sites (Dominvs Group)
- Allocating larger sites can contribute towards the improvement of existing or delivery of new infrastructure through on site provision or financial contributions (Bellway Strategic)
- Important to ensure that existing facilities in rural villages are supported (Dandara)
- Recognise sports, leisure and recreation facilities as community facilities (Cliffords Group Ltd, David Lloyd Leisure and Aquila Development Ltd)
- Opportunity for uses of land for nature centres for schools and the community (Cliffords Group Ltd)
- Boreham Neighbourhood Plan identifies a need for accessible facilities (Wates Developments Limited).

Summary of Public Comments:

- The review provides an opportunity to add new locations as community assets
- New development must have adequate and timely services and facilities
- Need closer working with infrastructure providers to ensure new community facilities are provided before homes are occupied
- Any planned development needs to have all the support/funding in place and locked in before it starts
- CCC could top up funding for public services or lobby ECC or Government for change
- Development must have the facilities and infrastructure to be self-contained
- Provision for young people is inadequate
- Large scale developments have not provided facilities for young people
- Lost many of the community spaces used by young people and older people as the number of halls for hire at community level has been decimated
- No slack in public services, existing infrastructure or facilities
- If development is not self-contained transport and pollution problems continue
- Concern about pollution from new developments
- Foot and cycle mobility must be encouraged for environmental and health benefits
- Parking around schools during school run time is a constant problem and new facilities need to address this
- Construction of healthcare facilities are not the issue, it is providing the staff
- Housing developments seem to be looked at in isolation from the existing housing and ignoring any local community need for facilities
- A cycle path/footpath does not knit a new development into the existing
- Analysis is needed of how far residents have to travel to access services and other community assets
- Closure of centralised facilities to those out of town means residents no longer have access unless they have private vehicles.

Our evidence says
National Policy - The NPPF continues to require LPAs to protect community facilities.
There is pressure on existing DIY livery yards across the Council's area for redevelopment to alternative uses.
The emerging Open Space, Sports and Recreational Facilities Study and Sports Facilities Strategy is assessing the need for community sports facility provision across the Council's area over the new plan period to 2041. It will help the Council ensure that the community has access to high quality facilities, helping communities to increase their levels of physical activity and improve their health and well-being. Any changes required to the review plan will be addressed at the Pre-Submission stage.
The Preferred Options IIA 2024 considers that policies to deliver and protect community assets would make a significant positive contribution to a number of the IIA objectives, including the economy, health and wellbeing, and urban renaissance, and help to ensure that there is sufficient provision of services and facilities to support growth and promote healthy lifestyles.
The EqIA conducted as part of the Preferred Options IIA 2024 records positive effects of policies relating to community services and infrastructure, accessible greenspace, and improved air quality on protected groups including the disabled, young and elderly people, and pregnant women.

The Preferred Options Local Plan
Policy DM20 (Delivering Community Facilities) and DM21 (Protecting Community Facilities) are amended to ensure facilities are flexible in their use so that they are suitable for a variety of uses and groups of people.
Policy DM21 (Protecting Community Facilities) increases protection for livery yards, catteries, doggy day care facilities and pubs; due to the increasing number of applications for the change of use of livery yards and pubs, and to reflect the increasing importance of catteries and doggy day care facilities post the Covid-19 pandemic.
The proposed site allocation policies and Strategic Policy S9 (Infrastructure Requirements) will ensure that new development is supported by necessary infrastructure and services including primary schools, green space, health provision.
New and improved infrastructure, services and facilities proposed in the Preferred Options Local Plan has been informed by discussions with service and infrastructure providers (including Essex County Council, National Highways and Anglian Water).
The design of, and access arrangements for, new schools will be considered at the more detailed masterplan/planning application stage in consultation with the Education Authority and Local Highways Authority.
Other policies in the Preferred Options Local Plan address issues such as minimising pollution (DM30 – Contamination and Pollution).

Design

Key statistics:

Question	Yes	No	Comments	Total number of responses
43. Do you support the approach being taken? If you disagree, please explain why?	28	5	26	59
44. Do you have any views on the Council's current design policies and the decisions they lead to?	N/A	N/A	20	20
45. What would you consider to be 'beautiful' in terms of development?	N/A	N/A	26	26
46. Do you have any views on the proposed ideas for new policies or significant changes?	N/A	N/A	35	35
47. Have we missed anything? Where possible, please support your answer with reference to any evidence.	N/A	N/A	16	16

Summary of Specific and DTC consultees comments:

- Support the proposed approach (Great Waltham Parish Council, Essex County Council)
- The proposed approach would address design issues connected with healthy lifestyles (Broomfield Parish Council)
- Approach does not take account of more obvious issues about architecture and design for example around the historic environment and how new development can integrate this successfully (Broomfield Parish Council)
- Support the reference made to the EDG in respect of new design policies (South Woodham Ferrers Town Council)
- Missed a reference to Village Design Statements as these can have a good input for local design codes (Broomfield Parish Council)
- The current policy needs to be more joined up with the net zero target of 2050 (South Woodham Ferrers Town Council)
- The current policy works best in master planned areas and is less successful in single or smaller developments (Broomfield Parish Council)
- Decision making should be more heavily informed by local residents (Great Waltham Parish Council)
- Any new design policies should not impact on the natural environment (South Woodham Ferrers Town Council)
- Beautiful is subjective and a wide range of policies are needed (Writtle Parish Council, Great Waltham Parish Council, Broomfield Parish Council)

- Beauty should reflect the democratic views of the local community (Broomfield Parish Council)
- Professionals should design developments with influences around the traditional views of beauty (Broomfield Parish Council)
- Beautiful is development which is not different in style or design to the existing (Great Waltham Parish Council)
- Beauty is about developments which amongst other matters fit in with the local architecture, landscape, has adequate open space, is safe and attractive and have sufficient provision for sustainable waste management (Broomfield Parish Council)
- Electricity pylons being visible in the landscape would not be beautiful (Great Waltham Parish Council)
- A beautiful place can be secured through the development of masterplans, design guides or codes, area-based character assessments, The Building Better, Building Beautiful Commission's report 'Living with Beauty' and the National Design Guide and National Model Design Code (Essex County Council)
- The South Woodham Ferrers Neighbourhood Plan sets out clear design principles which amongst other matters includes eco-friendly design as very important (South Woodham Ferrers Town Council)
- Support any new policies that highlight the need for Health Impact Assessments on large housing sites and bring the Livewell Accreditation into policy (Mid and South Essex Integrated Care Board (ICB), Sport England, Essex County Council)
- Health Impact Assessments should use the latest guidance from Essex County Council and Sport England (Sport England)
- Livewell Accreditation only encourages developers and appears weak. Should developers not need to provide evidence of how it has been considered and achieved (Great Waltham Parish Council)
- A flexible, site-specific approach should be followed for any housing density standards (Essex County Council)
- A minimum density standard should be introduced in certain locations where it is considered appropriate (Essex County Council)
- Reference should be made to the EDG on higher density development, which provides detailed guidance on a wide range of density matters (Essex County Council)
- Green Infrastructure (GI) provision and Integrated Water Management (IWM) is central to creating a framework for well designed, sustainable, and attractive places, and promoting the health and social wellbeing of communities (Anglian Water Services Ltd, Essex County Council)
- Welcome design guidance and design codes on relevant site allocations which sets out how the development would be made accessible and inclusive for all regardless of disability or impairment as well as the consideration of dementia friendly principles and autism friendly communities in the development of public and community spaces (Essex County Council)
- Welcome new policies that make explicit reference to planning and designing new developments with regard to the needs of the health and well-being of the whole population including older people and people with disabilities (Essex County Council)

- Within denser developments, green infrastructure and open space should be approached from a multifunctional perspective, combining uses such as sustainable drainage, public open space, walking and cycling routes and biodiversity conservation to combine functional uses with amenity benefits (Essex County Council)
- Support the use of Design Codes which imbed GI and IWM to help deliver sustainable development (Anglian Water Services Ltd)
- Support the creation of design codes and suggest that reference be made to the Essex Design Guide (EDG) and other ECC documents (Essex County Council)
- Greater emphasis should be placed on local design codes. How are they agreed and how can the local community and Parish Council get involved and be resourced and skilled to lead this process? (Broomfield Parish Council)
- The use of design policies and codes reflect the latest thinking and best practice in terms of delivering 'net zero' development (Essex County Council)
- Garages are not well used and too small for modern cars. Removing garages could create more space for on-plot parking or other more useful spaces for future residents (South Woodham Ferrers Town Council)
- Should be recognition of the central spine of South Woodham Ferrers as the High Street. This would help the expansion of the existing retail offer (South Woodham Ferrers Town Council)
- Greater emphasis on shared power locally in any new or amended policies (South Woodham Ferrers Town Council)
- Give greater recognition to the East of England Ambulance Service NHS Trust in promoting the health and social wellbeing of communities, as it fulfils a clear 'community cohesive and safety focused role'. This is through community first responders, the provision of life saving equipment such as defibrillators, and other 'first response' medical resources located in a community buildings and other locations (East of England Ambulance Service NHS Trust)
- The National Design Guide 2019 and EDG make specific reference to planning and designing new developments with regard to the needs of the ageing population. This can be achieved by ensuring homes and communities are flexibly designed and can adapt to user needs; providing options for self-care and self-support through digital connectivity; and supporting general health and wellbeing through the delivery of high-quality, considered design (Essex County Council)
- It is important that the new Local Plan recognises that good design goes beyond simply visual considerations. The Plan should require development proposals to make reference to the sustainable planning of building materials as well as the management of waste arising during construction (Essex County Council)
- Should include reference to the Essex Minerals Local Plan (Essex County Council)
- For new developments, whole life carbon assessments should be carried out and measures taken to reduce embodied carbon emissions targeting best practice (Essex County Council).

Summary of General Consultees Comments:

- Supportive of the proposed policies (CHP, L&Q)
- Beautiful is ensuring all people have access to the services and facilities they need (CHP)
- Beauty is development which has enough parking which is not on-street, and well-lit accessible dwellings with outdoor space including outdoor spaces interspersed with housing and community buildings, outdoor spaces with sympathetic planting that encourages wildlife and biodiversity and, elevated green space such as hedges and street trees (CHP)
- Concerned about all the proposed extra on site requirements proposed and the impact that will have on the site capacity/viability (CHP)
- Support a more design led approach to determining acceptable density levels (L&Q)
- Suggest that any proposed density guidance is expressed as a minimum figure to protect against the inefficient development of land. The policy should make clear that the appropriate density for each scheme will differ subject to various design factors including character, setting, layout, typology, landscape and open spaces (L&Q)
- CCC should carry out extensive engagement with stakeholders including developers and city residents in regard to the creation of design codes (L&Q).

Summary of Developer/Landowner/Agent Comments:

- Support the proposed approach which includes introduction of design codes (Bellway Homes Ltd, Obsidian Strategic Asset Management Ltd, Bellway Strategic, Taylor Wimpey, Persimmon Homes, Grosvenor Property UK and Hammonds Estates LLP, Gladman Developments Ltd)
- Proposed approach would be in line with national policy and guidance including the National Design Guide and National Model Design Guide (Bellway Homes Ltd, Bellway Strategic, Persimmon Homes, Mr Alexander Micklem, Gladman Developments Ltd)
- Support the current policy (Dominvs Group, Taylor Wimpey, Rosehart Properties Ltd, Pembridge Land Group, Persimmon Homes)
- Support the current policy as it is consistent with other good practice guides including the policy on Tall Buildings (Dominvs Group)
- Current policy will need updating in accordance with latest national policy and guidance (Rosehart Properties Ltd, Pembridge Land Group)
- Current wording is imprecise and views on architectural quality vary (Persimmon Homes)
- Question whether public art is required on all major development sites (Persimmon Homes)
- Express a commitment to the creation of beautiful, healthy, sustainable, distinctive and safe places and their essential role in high quality design (Obsidian Strategic Asset Management Ltd, Dandara Eastern, Taylor Wimpey, Dandara, Hill Residential Ltd, Persimmon Homes, Graham Dines, Gladman Developments Ltd)
- Support the proposed introduction of housing density standards (A.G. & P.W.H Speakman, The Bucknell Family, Mr Alexander Micklem, Bolton, S&D, Bellway Strategic, Chris Buckenham, Cliffords Group and Mr Mark Peters)
- The housing density standards could look at increasing housing densities around transport nodes (Countryside Partnerships)

- Housing density standards could be contained within a design code (Wates Developments Limited)
- Housing density standards should be created for different site locations across the local authority's area (Bellway Strategic)
- Housing density standards should be guidance and not policy (Countryside Partnerships)
- Not supportive of the proposed housing density standards as these should be on a site-specific basis (Dominvs Group, Wates Developments Limited)
- Housing density standards could slow down the planning process unnecessary, harm viability and the deliverability of sites (Wates Developments Limited)
- Not appropriate to set housing density standards as a blanket policy across all major sites as each site context is different (Gleeson Land)
- A number of stakeholders and disciplines should be involved in the process to shape future development (Gladman Developments Ltd)
- Support the introduction of design codes (Grosvenor Property UK and Hammonds Estates LLP, A.G. & P.W.H Speakman, The Bucknell Family, Mr Alexander Micklem, Bolton, S&D, Taylor Wimpey, Persimmon Homes, Dandara, Chris Buckenham, Cliffords Group and Mr Mark Peters)
- National design guides provide advice on how to achieve good design (Pembridge Land Group, Rosehart Properties Ltd, Persimmon Homes)
- Design codes should provide guidance on sites which are not of strategic scale (Hill Residential Ltd, Dandara Eastern, Graham Dines, Dandara)
- Do not support the introduction of design codes on major sites and no definition of major is provided in the I&O consultation document (Bellway Homes Ltd, Bellway Strategic, Gleeson Land)
- Design codes are only appropriate on strategic major sites where there are multiple developers (Gleeson Land)
- Requirement for a design code should be in site specific/allocation policies (Bellway Homes Ltd, Bellway Strategic)
- Separate design codes should be created for each settlement/local area (Persimmon Homes, Pembridge Land Group, Rosehart Properties Ltd)
- Planning policy should place great emphasis on outstanding or innovative design (Dominvs Group)
- There is no policy commitment to ensuring participatory design and planning throughout the development process for the strategic allocated sites (Grosvenor Property UK and Hammonds Estates LLP)
- Appendix B is not needed as some developers prefer to use the EDG which is more regularly updated and referred to in the Local Plan. EDG and Appendix B not always compatible. Either Appendix B should be more aligned with EDG or removed (Persimmon Homes)
- Concern about policy which aspires to achieve 'beautiful' development and that in aspiring 'beautiful' this is not disproportionately prioritised (Bellway Homes Ltd, Mr Alexander Micklem)
- Beautiful is subjective (Pembridge Land Group, Rosehart Properties Ltd, Bellway Strategic, Bellway Homes Ltd, Persimmon Homes)
- Should avoid the approach and use of the EDG as this produces ubiquitous design which is not beautiful (Pembridge Land Group)

- Use of the term ‘beautiful’ is resisted as it is ambiguous. Does not comply with the NPPF which requires Local Plans to be clearly written and unambiguous (Bellway Strategic, Bellway Homes Ltd)
- Local Plan should avoid defining beautiful as it stifles innovation and unique design (Dominvs Group)
- Beautiful development is compatible with its local surroundings and one where there has been engagement with the local community (Persimmon Homes)
- Beautiful is development which is defined by people who and live in the local area in line with the Government’s ‘Building Better, Building Beautiful’ Commission which recommended that public engagement be ‘wide, deep and early’ (Living with Beauty, 2020) (Grosvenor Property UK and Hammonds Estates LLP)
- Support to bring Livewell Accreditation in as a policy requirement (Grosvenor Property UK and Hammonds Estates LLP, Dominvs Group, Wates Developments Limited, Chris Buckenham, Cliffords Group, Mr Mark Peters)
- Concern that some of the new policies could hinder development (A.G. & P.W.H Speakman, The Bucknell Family, Bellway Homes Ltd, Mr Alexander Micklem, Bolton, S&D, Bellway Strategic, Chris Buckenham, Cliffords Group and Mr Mark Peters)
- Flexibility and collaboration are needed particularly between stakeholders (A.G. & P.W.H Speakman, The Bucknell Family, Mr Alexander Micklem, Bolton, S&D, Chris Buckenham, Cliffords Group and Mr Mark Peters)
- Critical that the employment strategy reflects and responds to emerging and rapidly changing trends in various key sectors by delivering a flexible supply of employment land across the local authority’s area throughout the plan period (Pigeon (Sandon) Ltd)
- Need for housing growth and economic needs to be considered and reviewed jointly (Pigeon (Sandon) Ltd).

Summary of Public Comments:

- Better design is required
- Developments physically separated from existing settlements cannot become integrated
- Needs a plan to mitigate impact on local ecology
- The planting of trees would not make up for the destruction of local habitats
- The current policies have led to some examples of good design
- The wording used in the proposed policies is too vague
- There are too many large houses on small plots or blocks of apartments
- Private outdoor amenity space is essential
- Sustainable development is important
- Support the introduction of housing density standards and design codes
- Safe design is paramount
- Housing densities should increase to encourage new commercial and leisure development
- There should be a maximum housing density standard
- Design standards in some recent developments has led to congestion, lack of personal space and gardens, and all developments looking the same

- On-shore wind turbines should be considered to power new development
- Attractiveness is subjective and does not always equal good design
- Beautiful development doesn't exist
- Beauty includes screening
- Beautiful means development which is in line with local building materials, design and scale and the local vernacular
- Beautiful is well-designed, meets the needs of its occupiers, is a variety of structures and finishes, means few or no cars, is redeveloping brownfield sites and is about creation of a shared community
- Symmetry is beautiful
- Beautiful is green with trees, gardens and communal green spaces, and communal ponds
- Beautiful is development with native trees, hedgerows and biodiverse gardens
- Beautiful is having your own driveway, access to travel services which are affordable and reliable, a variety of affordable homes and houses using modern technologies such as solar panels and heat pumps
- Need to identify locations for public realm enhancement
- Developers should be made accountable to provide safe, affordable, desirable developments that promote and safeguard people's physical and mental well-being
- Healthy places can only be achieved if they are located in large urban areas providing the facilities within walking/cycling distances, thus encouraging a healthier lifestyle and reducing pollution and the carbon footprint
- Support Health Impact Assessments but these should be used on applications of most relevance.
- The consultation misses the need to achieve integrated communities.

Our evidence says
National Model Design Guide and Code 2022 – these set out the characteristics of well-designed places and demonstrate what good design and beautiful places means in practice. Regard should be had to the Guide and the Code, which will be used to inform an update of the Making Places SPD.
Essex Part 1 Parking Guidance 2023 – sets out revised requirements for parking provision and electric vehicle charging infrastructure.
Report 2: Essex Net Zero Policy, and the Essex Design Guide 2023, set out design guidance and advice which underpins Policy DM31 (Net Zero Carbon Development (In operation)).
Historic England Advice Note 4 2022: Tall Buildings contains updated content which includes the need for high quality architecture and consideration of the viewpath.
The Preferred Options IIA 2024 considers that policies aimed at delivering high quality places would make a significant positive contribution to a number of the IIA objectives, including housing, health and wellbeing, climate change, landscape and townscape, and urban renaissance, including the requirement for net zero carbon development.

The Preferred Options Local Plan
Policy DM23 (High Quality and Inclusive Design), DM26 (Design Specification for Dwellings), DM27 (Parking Standards), and DM30 (Contamination and Pollution) are largely unchanged as they remain consistent with national policy and guidance. Reference has been added to design guidance contained in Neighbourhood Development Plans.
Policy DM24 (Design and Place Shaping Principles in Major Developments) has been expanded to include the requirement for developers to have regard to the National Model Design Guide and National Model Design Code. A link has also been included to tree planting advice; the requirement for development at a certain threshold to submit a Health Impact Assessment; and links to design resources for enhancing safety for girls and women in new development. Reference has been added to design guidance contained in Neighbourhood Development Plans.
Policy DM25 (Sustainable Buildings) includes updated requirements for water efficiency and rainwater harvesting, and access to electric vehicle charging infrastructure. Content relating to zero carbon development has been merged into Policy DM31 (Net Zero Carbon Development (In operation)).
Policy DM31 (Net Zero Carbon Development (In operation)) is a new policy developed with Essex Planning Officers Association and Essex County Council, for new buildings to be designed and built to be net zero carbon in operation.
Policy DM28 (Tall Buildings) has been updated to reflect the advice note published by Historic England.
Health and social wellbeing of communities, including design considerations, is now covered by the new Strategic Policy S14 (Health and Wellbeing).
The Making Places SPD will be reviewed, and any appropriate changes/additions included.
The Preferred Options Local Plan does not propose the use of minimum density standards. Policy DM23 (High Quality and Inclusive Design) recognises that good design relates to a consideration of the character and context of the area rather than imposing arbitrary density requirements. The use of 'around' housing figures allows for an appropriate degree of flexibility in provision and for higher density development to be brought forward where this conforms with other policies in the Plan as a whole. Strategic Policy 1 also supports the use of higher densities where appropriate on previously developed sites, particularly near public transport interchanges on previously developed sites and as reflected in site policy SGS1e (Civic Centre Land).

8 Delivering new and improved infrastructure to support growth

Infrastructure

Key statistics:

Question	Yes	No	Comments	Total number of responses
48. Do you support the approach to be taken? If you disagree, please explain why?	31	6	34	71

49. Do you have any views on the Council's current infrastructure policies and the decisions they lead to?	N/A	N/A	23	23
50. Have we missed anything? Where possible, please support your answer with reference to any evidence.	N/A	N/A	20	20

Summary of Specific and DTC consultees comments:

- Once there is more certainty on future growth locations Anglian Water will be able to plan investment to support that growth. This is likely to be in the plans for Asset Management Period 9 (AMP9) 2030-2035 (Anglian Water Services Ltd)
- Welcome the proposed approach and will provide necessary information to support the Council reviewing its Infrastructure Delivery Plan (IDP) and infrastructure required to support sites in a viable and sustainable manner (Anglian Water Services Ltd, Essex County Council, Mid and South Essex Integrated Care Board)
- Welcome reference for continuing to prepare site specific planning documents and adopt a master planning approach for major developments/growth areas with the emphasis on implementation and delivery to ensure the necessary infrastructure requirements, design codes, funding, phasing and delivery are fully addressed (Essex County Council)
- It is important to note that existing primary schools in the urban area have limited space to expand to accommodate any increase in demand (Essex County Council)
- In considering where new development should be located consideration should be given to both spare educational capacity and where existing education capacity has limited or no additional capacity (Essex County Council)
- Infrastructure in the current Plan was based on the 'around' site numbers and policies do not factor in any uplift on these regarding infrastructure requirements (South Woodham Town Council)
- Developments or potential site allocations that are unsustainable in school transport terms should be resisted (Essex County Council)
- Need for continued cross-boundary engagement should the growth strategy selected create infrastructure demands beyond Chelmsford's administrative boundary including the A12 transport corridors between Chelmsford and the M25, and onward impacts onto the A127 (Brentwood Borough Council, Rochford District Council)
- Connectivity needs to go beyond the development site for transport (active and sustainable), secondary schools, health and well-being, social and cultural and sewage disposal (South Woodham Town Council)
- More CIL money should be used for local infrastructure so there is a proper link between where the money is generated and where it is used. Developments outside Chelmsford should not be contributing to the infrastructure of the Chelmsford City area (South Woodham Town Council)

- Support strengthening health and wellbeing measures and facilities, placing stronger emphasis on improving sustainable and active travel infrastructure and opportunities (Mid and South Essex Integrated Care Board, Sport England)
- Identifying Strategic Priorities for community sports infrastructure will be particularly important in view of the widening range of competing infrastructure that CIL and planning obligations are expected to fund, the viability constraints of new development and limited external funding (Sport England)
- Would like to be involved with agreeing the scope and content of the IDP and Viability Study. Without involvement the Town Council will disagree with the approach taken as not being representative nor fair (South Woodham Ferrers Town Council)
- No issue with the approach and requirements for infrastructure but concern over the time items take to be delivered (Great Waltham Parish Council)
- Need to ensure agendas of all stakeholders are clearly aligned and infrastructure items can be delivered before sites are allocated (Broomfield Parish Council)
- Review should seek to ‘maximise’ the amount of on site infrastructure and contributions on new development, not simply ‘ensure’ infrastructure is provided subject to viability (Essex County Council)
- Need to refer to wider administration area and not just focus on 'city centre infrastructure' as currently drafted in this section (Rochford District Council, South Woodham Town Council)
- The section understates the value of new garden communities and their ability to deliver infrastructure, unlike the difficulties faced when trying to expand existing facilities (Broomfield Parish Council)
- ECC presently has no formal role in the CIL governance process. This has led to some difficulties in securing monies for infrastructure projects that ECC is required to deliver with any degree of certainty or when they may be required (Essex County Council)
- Policy S9 should be revised to support future proofing digital connectivity and high-quality mobile coverage for all homes and businesses. The policy refers to superfast broadband, but not fixed line gigabit-cable broadband and/or 5G connectivity (Essex County Council)
- A commitment to deliver infrastructure is missing from this section (South Woodham Town Council)
- More openness is needed to be able to prove to the public what can be achieved (Writtle Parish Council)
- Widen the Plan’s treatment of the term ‘infrastructure’ to also make reference to medical facilities (East of England Ambulance Service NHS Trust)
- Request a definition of ‘ambulance facilities’ is included either within the Local Plan or IDP to guide developers and decision makers (East of England Ambulance Service NHS Trust).

Summary of General Consultees Comments:

- Support a viability study being undertaken (CHP)
- New station at Beaulieu will open up new opportunities to locate sustainable development close to this important hub (North West Parishes Group)

- There needs to be a greater commitment to achieving safe cycle routes across the district (North West Parishes Group)
- The section understates the value of new garden communities and their ability to deliver infrastructure, unlike the difficulties faced when trying to expand existing facilities (North West Parishes Group).

Summary of Developer/Landowner/Agent Comments:

- Support the need to deliver the appropriate and timely infrastructure to support sites (Taylor Wimpey, Dandara, Obsidian Strategic Asset Management Ltd, Dandara Eastern, Grosvenor Property UK and Hammonds Estates LLP, Bellway Strategic, Hill Residential Ltd)
- Support the review of the IDP and further transport studies being undertaken (Chelmsford Garden Community Consortium)
- Any future infrastructure requirements need to be viability tested to ensure they can be delivered (Taylor Wimpey, Gleeson Land, Dandara, Dominvs Group, Dandara Eastern, Bellway Strategic, Hill Residential Ltd, Greystoke CB)
- Policies and requirements need to allow for flexibility to take account of any changes, as the Government is currently considering different options to the current CIL and S106 (Dandara, Dandara Eastern, Hill Residential Ltd)
- The aims and aspirations of the Council's Waterways Working Group should be reflected in the policies, particularly regarding infrastructure provision (Vistry Group)
- Support a review of important social infrastructure to promote mental health and wellbeing (Cliffords Group Ltd, David Lloyd Leisure and Aquila Development Ltd)
- Support a review to securing BNG and strengthening health and wellbeing measures (Cliffords Group Ltd)
- Sites which can enable the creation of new active travel corridors should be actively supported (Obsidian Strategic Asset Management Ltd)
- Support the need for community led infrastructure to respond to identified need amongst new and existing communities (Gray & Sons, Grosvenor Property UK and Hammonds Estates LLP, Miscoe Enterprises Ltd)
- Developments in rural villages and the Green Belt can also help increase the viability and the vitality of existing services and facilities and make provision for future facilities in the form of CIL payments and any site-specific infrastructure requirements (Dandara, Hill Residential Ltd, Graham Dines)
- Likely changes in Government planning legislation and policy may require fundamental changes to CIL (Pembridge Land Group, Rosehart Properties Ltd).

Summary of Public Comments:

- No development should be allowed to take place until the necessary infrastructure is in place
- Needs to be more concise about what will actually be done to support developments
- Delivery of necessary infrastructure should not be compromised at the expense of developer profit

- More needs to be done to reduce traffic from developments
- Consideration of the necessary infrastructure needs should be done much earlier in the process
- The Council has limited ability to influence provision/improvement of infrastructure such as hospitals, medical centres or the A12
- Paragraph 5.97 only considers Chelmsford and not, other Towns and Villages
- Need to take account of infrastructure required to address flood risk
- Consider trams, monorails or new branch lines to connect keys settlements with Chelmsford.

Our evidence says
In accordance with national policy and guidance infrastructure required to be delivered by a site must be generated by needs arising from the site. The Infrastructure Delivery Plan (IDP) 2023 sets out a high-level baseline of assumptions regarding infrastructure required to support the Preferred Options Local Plan proposed site allocations. The IDP will be reviewed and updated as the Plan progresses and covers the whole Plan area.
The Local Plan Viability Report (2023) provides a high-level viability of different typologies of development sites that could come forward through the new Local Plan allocations. The assessment supports the site allocations in the preferred Spatial Strategy, which can be achieved in combination with all policy requirements (including infrastructure requirements).
The Preferred Options IIA 2024 considers that policies to secure infrastructure would make a significant positive contribution to a number of the IIA objectives, including the transport, water and flood risk, including positive effects on water resources and quality, and mitigating flood risk.

The Preferred Options Local Plan
The Preferred Options Spatial Strategy has been informed by infrastructure providers, such as Anglian Water Services Ltd, Essex County Council, Mid and South Essex Integrated Care Board, and the Council will continue to work with providers to ensure the necessary infrastructure required is identified in the Infrastructure Delivery Plan (IDP). Further information on the approach to the Spatial Strategy and site selection is set out in the Preferred Options Spatial Strategy and Strategic Sites Topic Paper.
Master planning for strategic site allocations continues to be a policy requirement for relevant sites.
All infrastructure requirements in the Preferred Options Local Plan are based on current known housing numbers in the April 2023 Housing Site Schedule.
In accordance with national policy and guidance infrastructure required to be delivered by a site must be generated by needs arising from the site.
Strategic Policy S9 (Infrastructure Requirements) has been updated to reflect current infrastructure needs for the Preferred Options Local Plan. This includes the need for gigabit broadband, emergency services infrastructure, health and wellbeing facilities and measures, and flood mitigation measures, along with many other types of infrastructure provision.
The delivery of infrastructure will continue to be through a combination of on and off-site provision, through the combination of planning conditions and/or planning obligation and/or financial contributions through the Community Infrastructure Levy

The Preferred Options Local Plan
or its successor, in accordance with Strategic Policy S10 (Delivering Infrastructure) and site policy allocations and their relevant requirements.
Strategic Policies S4 (Conserving and Enhancing the Natural Environment) and S17 (Future of Chelmsford City Centre), and relevant site policies include the need for development to take into account the Council's Plan for Improving Rivers and Waterways 2022 (Item 7 on Agenda available via the link), which sets out opportunities to improve these assets.

9 Encouraging resilience in retail, leisure, commercial and cultural development

Retail and Designated Centres

Key statistics:

Question	Yes	No	Comments	Total number of responses
51. Do you support the approach to be taken? If you disagree, please explain why?	21	1	7	29
52. Do you have any views on the Council's current retail policies and the decisions they lead to?	N/A	N/A	15	15
53. Have we missed anything? Where possible, please support your answer with reference to any evidence.	N/A	N/A	12	12

Summary of Specific and DTC consultees comments:

- Support for the proposed approach (Essex County Council, Braintree District Council, Great Waltham Parish Council, Writtle Parish Council, Broomfield Parish Council)
- Consider the implications of significant flexibilities provided through the revised Use Class E and the permitted change use between Commercial, Business and Service (Class E) to residential (C3). Issues to consider include the potential reduction in design quality and potential for mitigation measures given the decrease in developer contributions. It is unclear how town centres and high streets will be plan-led as the permitted development rights undermine the ability of Local Plan policies to manage the development of places appropriately (Essex County Council)
- CCC's retail policies generally seem to have had a positive impact on South Woodham Ferrers Town Centre with new local shops and businesses opening in the past five years. CCC's retail policies need to recognise local partnerships such as the 'business forum'. Would also like to see a 'place

branding' strategy introduced for South Woodham Ferrers (South Woodham Ferrers Town Council)
- Visiting city/town centres has to be made attractive, and this is likely to be less so if a primary focus on retail is maintained (Great Waltham Parish Council)
- Current retail policies are not flexible enough to reflect current and future trends. At present the future function and use of centres is very volatile. A greater range of sustainable solutions should be available to offset potential conventional retail challenges. Vitality should be encouraged at almost all costs to prevent potential central urban decay (Writtle Parish Council).

Summary of General Consultees Comments:

- General support for the proposed approach (Newlands Springs Residents Association).

Summary of Developer/Landowner/Agent Comments:

- General support for the proposed approach (Rosehart Properties Ltd, Pembridge Land Group, Dominvs Group, Bellway Strategic, Mr & Mrs Andrew Parker, Taylor Wimpey)
- Conventional retail has been subject to substantial structural change with many goods available conveniently and cost effectively on-line having a noticeable impact on high streets and city centres. Maintaining a vibrant city requires a wide range of uses, including residential which will enhance footfall benefitting local shops and services (Dominvs Group)
- Whilst siting of new residential development can assist in ensuring the continued vitality and viability of centres, allowing settlements to expand through new development outside of the existing settlement boundary can allow the population of settlements to grow. This will increase footfall to existing shops and services especially where there is good pedestrian connectivity to the town centre (Bellway Strategic)
- Major changes in retail shopping patterns and activity, together with changes to the Use Classes Order necessitate a significant review and updating of current retail policies. The current economic downturn and rising inflation will also influence current trends (Rosehart Properties Ltd, Pembridge Land Group)
- Existing retail polices recognise the primacy of Chelmsford City Centre in retail terms and this is welcome (Aquila Developments Ltd)
- Policy DM5 is predicated on managing the proportions of A1, A2 and A3 uses in key frontages, and now redundant with the introduction of Class E (Dominvis Group)
- The city centre focus needs to be retained via a clearly defined Primary Shopping Area irrespective of the changes introduced by the Use Classes Order. Frontage classification within this wider definition is of lesser significance (Aquila Developments Ltd).

Summary of Public Comments:

- Why do policies (5.107) apply to Chelmsford City but not the rest of the Chelmsford area? Disagree because the approach is not being enforced
- A mixture of uses in town centres makes them more interesting. Focussing solely on retail is unrealistic with the popularity of online shopping
- Consider increased leisure uses in town centres where the demand for shopping is reduced
- There is scope for high rise residential development in urban centres, especially Chelmsford to provide accommodation particularly for single people and students. This would also help CCC achieve its residential development targets
- South Woodham Ferrer's retail space needs to be improved. The layout and flow of the town is enclosed, unappealing and limits foot traffic. The properties and paving are in a bad state of repair and disconnected from green spaces.

Our evidence says
The Retail Capacity Study Update 2023 finds that there is no need to allocate new sites for retailing in the review plan and that there are no significant gaps in the provision of larger commercial leisure facilities.
National Policy - The requirement to designate primary and secondary retail frontages has been removed from the NPPF.
The Retail Capacity Study Update 2023 recommends changes to the boundaries of Chelmsford City Centre to focus on the area of the city centre's main function as a retail and leisure destination.
The Retail Capacity Study Update 2023 recommends that the boundary of Beaulieu Principal Neighbourhood Centre is changed to better reflect the centre's provision of shops and services.
The Retail Capacity Study Update 2023 recommends that a Primary Shopping Area is defined for The Vineyards Principal Neighbourhood Centre to protect the core area of this centre for town centre use purposes.
A significant reform of the Use Class Order was announced in July 2020 with effect from September 2020. A new use class, a broad Use Class E (Commercial, Business and Service) was formed merging the former Use Classes labelled A1, A2, A3, B1, B2, D1 and D2.
The Chelmsford Retail Capacity Study 2023 recommends that a 500sqm gross threshold for impact assessments should apply to leisure as well as retail proposals (for retail proposals outside of designated primary shopping areas and for leisure proposals outside of town centre boundaries).
The Chelmsford Retail Capacity Study 2023 supports the amalgamation or subdivision of existing uses to encourage investment; 'meanwhile' uses to temporarily occupy long-term vacant units where they support the vitality and viability of the town centre, and complementary initiatives such as click and collect hubs and outdoor space for public events.

The Preferred Options Local Plan
No floorspace for additional new convenience or comparison shopping is proposed in the Preferred Options Local Plan in line with the Chelmsford Retail Capacity Study 2023.
National Policy - Primary and secondary retail frontages have been removed from Strategic Policy S12 (Role of City, Town and Neighbourhood Centres) and DM5 (Designated Centres) to reflect updates to the NPPF.
Strategic Policy S12 (Role of City, Town and Neighbourhood Centres) and DM5 (Designated Centres) are changed to reflect changes to the Use Classes Order, downturn in economy, changing retail shopping habitats and to provide greater flexibility for a mix of uses.
A new Strategic Policy S17 (Future of Chelmsford City Centre) is added to the Preferred Options Local Plan. This policy seeks to improve the City's cultural offer, achieve increased footfall, activity and vibrancy.
In line with Chelmsford Retail Capacity Study 2023, the boundaries of Chelmsford City Centre and Beaulieu Principal Neighbourhood Centre are reduced, a new Primary Shopping Area is proposed at The Vineyards Principal Neighbourhood Centre, and no amendments are proposed to Chelmsford and South Woodham Ferrers Primary Shopping Areas or to South Woodham Ferrers Town Centre.
Some matters raised in the representations are too detailed for a Local Plan such as 'place branding' of South Woodham Ferrers Town Centre.

<u>Encouraging resilience in leisure, commercial and cultural development</u>

Key statistics:

Question	Yes	No	Comments	Total number of responses
54. Do you support the approach to be taken? If you disagree, please explain why?	19	3	14	36
55. Do you have any views on the Council's current leisure, commercial and cultural policies and the decisions they lead to?	N/A	N/A	13	13
56. Have we missed anything? Where possible, please support your answer with reference to any evidence.	N/A	N/A	15	15

Summary of Specific and DTC consultees comments:

- General support for the proposed approach (Sport England, South Woodham Ferrers Town Council, Great Waltham Parish Council, Writtle Parish Council)
- Up-to-date and robust evidence base on community sports facilities is required to support the updated policies as the existing evidence base is out-of-date (Sport England)

- South Woodham Ferrers has a good leisure centre including a swimming pool and Marsh Farm but no cultural facilities (such as cinemas and art galleries). Cultural assets are focused in Chelmsford. Any approach to leisure should recognise this shortcoming (South Woodham Ferrers Town Council)
- There should be a commitment from CCC to work with Town Council and ECC to improve the outdoor cultural offer such as commissioning of sculptures to place within the green necklace which reflect historic and environmental aspects of our town. South Woodham Ferrers should also be more fully integrated into CCC's cultural offering so that our residents can have access to outdoor performances without having to travel to Chelmsford e.g. the 3 foot festival. The Town Council are looking into setting up a museum/cultural centre in South Woodham Ferrers, so that artifacts and records of the town can be available for residents and visitors (South Woodham Ferrers Town Council)
- Larger new-build developments should be concentrated in existing built-up areas, and this should follow through into many aspects of the provision of leisure, commercial and cultural facilities (Great Waltham Parish Council)
- Local evidence is needed to property and accurately assess growth needs of individual settlements (Writtle Parish Council).

Summary of General Consultees Comments:

- General support for the proposed approach (Newlands Spring Residents Association, Theatres Trust, Chelmer Housing Partnership)
- The existing Local Plan has strong policies on the promotion and protection of valued community and cultural facilities. We would wish to see these retained (The Theatres Trust)
- Object to multiple aspects of this plan and consultation. Development should be infrastructure led, rather than just meeting targets. Roads, schools, GP practices and bus routes need to connect and join our communities. The Government's baseline for affordable housing is not truly affordable, what percentage will be social housing including shared ownership and rent, 35% is recommended. A mixture of three and two bed housing is needed, not luxury five bedrooms houses. Have the figures for housing development been peer reviewed by development experts? (Chelmsford Labour Party)
- Include something to reflect the ongoing opportunities for residents to help shape the local communities that are developing. For example, your policy on hearing the resident's voice in the developments of place. It should connect to CCC participation policies or strategies. Communities are made by people not just infrastructure and the ambition could be stronger in this area (Chelmer Housing Partnership).

Summary of Developer/Landowner/Agent Comments:

- General support for the proposed approach (Taylor Wimpey, Rosehart Properties Ltd, Mr & Mrs Andrew Parker, Pembridge Land Group, Dominvs Group, Grosvenor Property UK and Hammonds Estates LLP, Cliffords Group Ltd)
- Adopted Local Plan policy directs community facilities to areas well served by public transport which is supported (Dominvs)

- Existing policies have led to delivery of enhanced leisure, commercial and cultural facilities in the city, but the economic downturn and recession may act as a constraint to delivery of future schemes. It is important that the major growth sites provide sufficient and a balanced range of such facilities (Rosehart Properties Ltd, Pembridge Land Group)
- The output from the updated retail and leisure needs study is awaited but we believe that previous studies have already indicated that adequate provision is required for indoor commercial sport & leisure. Policy initiatives have been largely directed to public facilities which will not fully meet this need. Urban growth to the north of Chelmsford should be an important factor in securing additional provision across a range of leisure types (Aquila Developments Ltd)
- Leisure, commercial and cultural related priorities and policies should encourage developments to facilitate such facilities based on local need and engagement with local communities (Wates Developments Ltd).

Summary of Public Comments:

- There appears to be no coherent plan for the city centre to attract small independent business or perhaps change the usage to residential to bring a vibrancy back. It is a classic doughnut effect where high rates, a lack of investment and out of town shopping centres destroy traditional high streets
- The approach should reflect the need for balance between demand for land for recreational use and making room for nature to ensure biodiversity targets are met
- It is refreshing to see places other than Chelmsford City being considered
- The city is lacking in cultural amenities e.g. art galleries, theatres, purpose-built, flexible open spaces for exhibits/ multi-media. All such additions will bring multiple streams of revenue through the venues, hospitality etc
- Waterways in the area provide excellent opportunities for leisure and healthy living
- Consider how policies might need to be changed or introduced in order to cope with Covid and future pandemics.

Our evidence says
The Retail Capacity Study 2023's qualitative and quantitative assessment of leisure need does not identify any significant gaps in the provision of larger commercial leisure facilities in the plan area.
An updated Open Space, Sports and Recreational Facilities Study and Sports Facilities Strategy has been commissioned and will be used to inform the final draft Local Plan (Pre-Submission Local Plan).
The Retail Capacity Study 2023 recommends that a 500sqm gross threshold for impact assessments should apply to leisure as well as retail proposals.
The Cultural Strategy 2023 provides a long-term vision that recognises the value of culture to us all. It will set our priorities for improving the culture services of the entire district of Chelmsford, including its parishes, the town of South Woodham Ferrers, and the city centre.

The Preferred Options Local Plan
No new floorspace for additional leisure or culture development is proposed in the Preferred Options Local Plan in line with the Retail Capacity Study 2023.
The emerging Open Space, Sports and Recreational Facilities Study and Sports Facilities Strategy will provide up-to-date and robust evidence base on community sports facilities required to support the updated policies in the Pre-Submission Local Plan.
Strategic Policy S5 (Protecting and Enhancing Community Assets) is updated to reflect new Strategic Priority 2 (Promoting smart, active travel and sustainable transport) to change how people make their journeys towards more sustainable and active travel choices. The policy also encourages extensions to existing facilities in line with the NPPF and is updated to reflect changes to the Use Classes Order.
The proposed site allocation policies and Strategic Policy S9 (Infrastructure Requirements) ensure that new development is supported by necessary infrastructure and services including primary schools, green space and health provision.
Strategic Policy S12 (Role of City, Town and Neighbourhood Centres) is amended to reflect changes to the Use Classes Order, downturn in economy, changing retail shopping habitats and to provide greater flexibility for a mix of uses. It also requires leisure proposal to carry out impact assessments, to reflect the findings of the Retail Capacity Study 2023.
A new Strategic Policy S17 (Future of Chelmsford City Centre) is added to the plan. This policy seeks to improve the City's cultural offer, achieve increased footfall, activity and vibrancy, having regard to the Chelmsford Cultural Strategy 2023.
Local Plan policies support the provision in principle of new community facilities such as art galleries and cinemas including Policy DM20 (Delivering Community Facilities).
National Policy - Policy DM20 (Delivering Community Facilities) is updated to encourage flexibility in design and shared use to enhance the sustainability of communities and residential environments, in line with the NPPF.
Policy DM21 (Protecting Community Facilities) is updated to reflect the needs to increase protection of public houses to resist further losses to alternative uses.
There will a further round of public consultation on the final draft or Pre-Submission Local Plan.
There will be additional opportunities to help shape new developments and communities once the new Local Plan is adopted including through the development of site masterplans and planning applications.

Part 6 – Spatial Principles and Spatial Options

This section of the consultation document considers the Spatial Principles that will be used to ensure growth is planned in a sustainable way and underpin the choice of sites to accommodate growth. It also presents five Spatial Approaches for how growth could be distributed in the future review plan.

Spatial Principles

Key statistics:

Question	Yes	No	Comments	Total number of responses
57. Do you agree with the proposed updates to the Spatial Principles? If not, please give the reasons for your answer. Please refer to the Spatial Principle number in Table 7.	52	17	86	155
58. Are there any Spatial Principles you think should be added? Where possible, please support your answer with reference to any evidence.	N/A	N/A	27	27

Summary of Specific and DTC consultees comments:

- General support for the Spatial Principles (Essex County Council, Braintree District Council, Rochford District Council, Anglian Water Services Ltd, Essex Police Fire and Crime commissioner, Mid and South Essex Integrated Care Board)
- None of the Spatial Principles can be measured or used effectively to steer planning applications. They need to be more vigorously and precisely worded and made SMART (South Woodham Ferrers Town Council)
- These principles are not generally being met in the immediate area of some developments and are not being considered across sufficiently wide areas to address impacts in neighbouring parishes (Great Waltham Parish Council)
- Support the additional references to reducing carbon emissions g) and protecting the Green Belt from inappropriate development, as opposed to all development b) (Broomfield Parish Council)
- The use of the word ‘promote’ in c) indicates a more watered-down approach to building on previously developed land than in the adopted local plan
- Disagree with including development at all settlements set out in the Settlement Hierarchy (Broomfield Parish Council, Great Waltham Parish Council)
- Support spatial principle f), to respect the character and appearance of landscapes and the built environment and preserve or enhance the historic environment and biodiversity (Historic England)
- Reference to the need to protect the best and most versatile (BMV) agricultural land from significant, inappropriate or unsustainable development proposals should be added to f) (Chignal Parish Council)
- Wording of principle g) should be strengthened to ‘radically reduce carbon emissions’ in line with the NPPF (Essex County Council)
- Enhance principle j) to say ‘Ensure that developments and the required infrastructures are deliverable’ (South Woodham Ferrers Town Council)
- Add a principle that considers proposed national Infrastructure projects that are known about (South Woodham Ferrers Town Council)
- Add a principle that considers neighbouring Borough developments on the borders (South Woodham Ferrers Town Council, Maldon District Council)

- A spatial principle to encourage the incorporation of renewable energy schemes and energy efficiency into all development sites would make the issue of tackling climate change more central within the Local Plan (Braintree District Council).

Summary of General Consultees Comments:

- Agree to all but the exclusion of the Green Belt from development (Newlands Spring Residents Association).

Summary of Developer/Landowner/Agent Comments:

- General support for the Spatial Principles (Croudace Homes, Gleeson Land, Dandara, Landvest Developments Ltd, Obsidian Strategic Asset Management Ltd, Bolton, S&D, Persimmon Homes, Dandara Eastern, Mr Alexander Micklem, Ptarmigan Chelmsford A Ltd, Grosvenor Property UK and Hammonds Estates LLP, Redrow Homes & Speakman Family, Bellway Strategic, Richborough Estates, Hill Residential Ltd, Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern), Harris Strategic Land Ltd, Graham Dines, Greystoke CB, Miscoe Enterprises Ltd, Cliffords Group Ltd, A.G. & P.W.H Speakman, The Bucknell Family, Cliffords Group and Mr Mark Peters, Pigeon (Sandon) Ltd, Bellway Homes Ltd)
- Broad support but consider the Draft Plan fails to actually apply them in practice (e.g. missing opportunities to facilitate delivery of flood risk alleviation measures by making partial amendments to the Green Belt) (Vistry Group)
- Plan will need to provide clarity as to how these Spatial Principles will be used and implemented (Dandara, Hill Residential Ltd, Graham Dines)
- Important for the Plan to recognise that it may be difficult for any one Spatial Principle to be considered in isolation (Sempra Homes Ltd, Marden Homes Ltd)
- Suggest condensing the number of principles into a shorter list, or an over-arching statement, which conveys the objectives succinctly but avoids unnecessary duplication (Bellway Homes Ltd)
- Paragraph 16 of the NPPF expects Local Plans to serve a clear purpose which avoids the unnecessary duplication of policies that apply to a particular area. It is not considered that Spatial Principles a), e), h), and i) effectively achieve this, or are necessary (Bellway Strategic)
- The replacement of “Optimise the use of suitable previously developed land for development” to “Promote the use of suitable previously developed land for development” unnecessarily dilutes a key Spatial Principle (Dominvs Group)
- Principle ‘e’ should also include reference to development in the Chelmsford Urban Area (Martin Grant Homes)
- There is a need to review the Green Belt as it has not been shown that development in the Green Belt is not the most sustainable pattern of development (Charterhouse Property Group & Charterhouse Strategic Land, Rosehart Properties Ltd, Martin Grant Homes, Taylor Wimpey Homes, Pembridge Land Group, Vistry Group, The Howgego Trust, Gray & Sons, Taylor Wimpey Strategic Land, Hill Residential Ltd)

- Support focusing development outside the Green Belt (Marden Homes Ltd, Sempra Homes Ltd, Mr A Smith)
- Smaller settlements such as Chatham Green should not be excluded from principle ‘e’, as the Essex Highways Sustainable Accessibility Mapping Appraisal suggests it is a very sustainable location on a transport corridor (Mr and Mrs Andrew Parker, Strutt and Parker (Farms) Ltd)
- Small settlements and those in the Green Belt require some growth to support ongoing provision of existing services and amenities (The Howgego Trust)
- Development should be located in sustainable locations but principal e) has an over reliance on the use of the settlement hierarchy to determine the Spatial Strategy and location of growth (H R Philpot & Sons, Chris Buckenham, C J H Farming Ltd)
- Principle (e) should recognise that locations in lower order settlements, or in the countryside and / or Green Wedge can accommodate modest levels of new development, subject to their sustainability and appropriateness (Hill Farm (Chelmsford) Ltd)
- Spatial Principle g) should be separated into two distinct Principles to ensure clarity in its application (Bellway Strategic)
- As the Council’s Settlement Hierarchy is informed by a review of available services, facilities and infrastructure, Principle h) and i) are not necessary (Bellway Strategic)
- Where there are sites located on the end of the existing urban area and meet all of the relevant Spatial Principles, their siting within the Green Wedge should not automatically discount them for development (Mr J Bolingbroke, Sempra Homes Ltd)
- Omission of any recognition for the need to support rural communities and rural economy to provide sustainable development in these locations (Mr and Mrs Richard and Sally Speakman, Cliffords Group Ltd, CJH Farming Ltd)
- More could be included on how development will support and enhance the rural environment and its linkages to the Green Wedge and the importance of social and green infrastructure (Cliffords Group Ltd)
- Could look to accommodate development in locations with the potential to expand further beyond 2041 (Taylor Wimpey)
- Add after e) ‘‘Enhance the vitality and sustainability of the other settlements in the local authority area’’ (Croudace Homes)
- Add the following words at the end of the sentence at e): ", including making appropriate provision for rural housing to maintain the viability and vitality of all villages" (Edward Gittins Associates)
- Add a ‘Transport Corridor Spatial Principle’ as development should be directed towards sustainable locations across the existing transport corridor to make use of the existing and new transport infrastructure (Strutt and Parker (Farms) Limited)
- Add ‘‘Locate development at locations which meet the needs of users and occupiers, and supports economic growth’’ to better reflect NPPF and PPG requirements (Greystoke CB)
- Add ‘‘Promote sustainable growth within the Green Wedge where it is appropriate and respects the role and function of the Green Wedge” (Cliffords Group Ltd, Miscoe Enterprises Ltd, Cliffords Group and Mr Mark Peters)
- Add ‘‘Continue and enhance the vitality of rural communities and the wider rural economy, promoting the Green Wedge to support this objective where

development aligns with the role, function and purposes of the Green Wedge'' (Cliffords Group Ltd)
- Add ''Ensure the delivery of social infrastructure to serve both existing and proposed communities'' (Cliffords Group Ltd, David Lloyd Leisure and Aquila Development Ltd)
- Could amalgamate h) and i) (Dominvs Group).

Summary of Public Comments:

- Admirable but unobtainable principles
- Unclear what 'inappropriate development' in the Green Belt would be
- Disagree with protecting the Green Belt as this automatically and unnecessarily limits growth in these areas and damages other areas
- Principle b) should include protecting Green Wedge and Rural Areas from inappropriate development
- Principles b) and f) should be strengthened and adhered to in planning decision-making
- Principle c) should be amend to ''Prioritise development on previously developed land''
- Principle e) results in existing settlements being overwhelmed by further development.
- Flood risk and carbon emissions should be separate Spatial Principles
- The link between ensuring necessary infrastructure and encouraging innovation is unclear
- Existing infrastructure should not be stretched so it worsens the experience for existing residence, new infrastructure should be built to support new development
- Add the need to avoid the development of high quality agricultural land
- Replace e) with ''Spread development proportionally throughout the Chelmsford Area''
- Review the Green Belt to see if development could be the most sustainable pattern of development.

Our evidence says
The Spatial Principles and supporting text reflect the local priorities in the Council's corporate plan Our Chelmsford, Our Plan.
The Preferred Options IIA 2024 considers that the Spatial Principles will result in diverse effects which reflect the complexity of delivering large-scale development. Generally positive effects are envisaged with development in the urban area, with urban fringe sites requiring mitigation for impacts on environmental resources. Most dwellings and employment land will be delivered in/adjacent to urban areas and Key Service Settlements which have greater capacity in terms of their sustainability to receive growth.

The Preferred Options Local Plan
The Spatial Principles are set out in Strategic Policy S1 (Spatial Principles) and remain largely unchanged as they continue to be consistent with national policy and guidance. Some clarification of wording is included in relation to inappropriate

The Preferred Options Local Plan
development in the Green Belt, carbon emissions, and innovative solutions for active and sustainable travel.
No review of the Green Belt is proposed; the Green Belt will continue to be protected from inappropriate development. It is considered that the purpose of the Green Belt is clear within the Preferred Options Local Plan, as set out in Strategic Priority 4 and Strategic Policy S1 (Spatial Principles).

Spatial Strategy and Strategic Housing and Employment Land Availability Assessment (SHELAA)

Key statistics:

Question	Yes	No	Comments	Total number of responses
59. Do you support the changes to the methodology and criteria note of the Strategic Housing and Employment Land Availability Assessment (SHELAA)? If you disagree, please explain why.	19	15	30	64

Summary of Specific and DTC consultees comments:

- Should be restricted to those areas which form part of the proposed Spatial Strategy (South Woodham Ferrers Town Council)
- Unsure where the proposed changes are set out (Broomfield Parish Council)
- Local Policy Constraints ‘‘Where a site has identified constraints that would prevent the implementation of a vehicle access route to the site’’ should be amended to refer to ‘…of a safe vehicle access route…’ (Essex County Council)
- The EDG recommends that any residential area should be no further than 600 metres walking distance from a primary school and 1,500 metres from a secondary school via a safe direct route and reference to schools should be amended accordingly (Essex County Council)
- Welcomes the inclusion of community facilities and renewable power generation in the 2022 SHELAA Assessment Criteria (Essex County Council)
- ECC will be undertaking a countywide assessment to identify potential areas of land which could be suitable for solar and wind schemes. The outputs could potentially be added to the SHELAA criteria (Essex County Council)
- Support the inclusion of a suitability criteria relating to ‘mineral and waste constraints’ but that this process also considers the land around the site in order that its allocation/development does not constrain any potential future use for mineral extraction and subsequent amendments be made to the suitability criteria for this section (Essex County Council)
- Whether prior extraction for minerals is practical at the site should be considered in the context of the non-mineral development, taking into account the estimated value of the mineral, a restoration scheme and the viability of the proposed non-mineral development (Essex County Council)

- To align with the ECC Developers Guide the threshold in the site assessment measure stated as ‘Development that would yield 10 or more dwellings is considered to add strain on existing facilities unless such facilities are incorporated within the proposal’ be increased from 10 to 20 (Essex County Council).

Summary of General Consultees Comments:

None.

Summary of Developer/Landowner/Agent Comments:

- Support for the proposed changes (Charterhouse Property Group & Charterhouse Strategic Land)
- There are gaps in the methodology (though not stated what those are) (Dominvs Group)
- Support the changes but note it must be carried out on a ‘‘policy-off’’ basis and allow for consultation on the outputs once published (Obsidian Strategic Asset Management Ltd)
- Welcome the introduction of a set of criteria and scoring for mixed use sites (Grosvenor Property UK and Hammonds Estates LLP)
- Needs to be more done to factor in large sites which contain features such as Heritage Assets to ensure these do not skew the results of the assessment (Grosvenor Property UK and Hammonds Estates LLP)
- A second ‘‘policy on’’ assessment, having regard to policy constraints identified and the extent to which these can be mitigated should be undertaken to ensure compliance with para 002 (Reference ID 3-002-20190722) of the PPG (Bellway Strategic)
- Needs to recognise that the presence of constraints, such as flood risk, on small areas of larger strategic scale sites does not represent an absolute constraint to the development of that site (Bellway Strategic)
- Needs to distinguish between policy constraints and physical constraints (Mr J Bolingbroke, Sempra Homes Ltd)
- Green Wedge should not be considered a constraint to residential development as land with this designation should be reviewed, and may be found it should not remain as Green Wedge as part of the review (Mr J Bolingbroke, Sempra Homes Ltd, Miscoe Enterprises Ltd, Cliffords Group Ltd)
- Consultation document does not provide details of changes to the methodology and criteria note of the SHELAA, further opportunity to comment on the methodology would be welcomed (Richborough Estates)
- Comments made on the previously published 2021 SHELAA methodology and scoring for sites, requesting these are reviewed (Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern))
- An additional level of refinement should be introduced such that sites within 400m of public transport are scored 3 under PROW and Cycling Connectivity (Greystoke CB)
- It should be made clear that the SHELAA is an evidence base document and that site allocations are made in the Local Plan (Greystoke CB)
- Criteria note and scoring mechanism is unduly complex (Martin Grant Homes)

- Scoring for minerals should be removed or significantly altered as it does not necessarily hinder development of a site (Martin Grant Homes)
- Premature to rule out Green Belt sites as it has not been established that a Green Belt Review is not required (Martin Grant Homes)
- Unreasonable to score a site as 0 out of 5 if it is anticipated that some level of ground remediation is required (Martin Grant Homes)
- Unreasonable to score a site negatively under 'Neighbouring Constraints' without providing a written explanation as to what the Council perceive to be a "constraint with no potential for mitigation'' (Martin Grant Homes).

Summary of Public Comments:

- Criteria listed seems to be incomplete and should include impact on neighbouring communities
- Approach is fair and balanced
- Greater protection should be given to the River Chelmer and the Chelmer Valley.

Our evidence says
The assessment of vehicle access includes where there is current access (highest score) and no visible constraints likely to prevent implementation of a route to enable vehicle access in paragraph 4.8 of the Criteria Note of the SHELAA 2022/2023. This avoids the qualitative determination of whether an access could be made safe, which is not something that can be determined in a desktop exercise.
No action was taken in relation to the Criteria Notes assessment of proximity to key services as current distances align with adopted Integrated Impact Assessment (IIA) for the Local Plan. The IIA will be kept under review in the Local Plan Review process and any relevant amendments will be made to the SHELAA Criteria to mirror any changes that might in future be made to the former.
The minerals and waste constraints assessment section in the Criteria Note was agreed with Essex County Council prior to publication of the SHELAA 2022/2023. The criterion was amended to align better with the Minerals Local Plan and Waste Local Plan and the capped criteria relating to Minerals and Waste has been removed.
The impact on community facilities was amended to a yield of 20 or more to align with the ECC Developers Guide in the Criteria Note of the SHELAA 2022/2023.
The impact on Designated Heritage Assets is not a capped constraint in the Criteria Note of the SHELAA 2022/2023 therefore cannot skew the results for any site.
National Planning Practice Guidance states that plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites. Whilst the key purpose is to identify sites and their constraints, this does not mean that they are completely ruled out. Also, the assessment does not in itself determine whether a site should be allocated for development. A comparison of sites based upon performance against specific criteria is already possible through the provision of individual scores against each criterion - to make this easier, we have added in a total score field to the site output report. The Green Belt designation is a national policy constraint and is consequently awarded a Red RAG rating in the Criteria Note of the SHELAA 2022/2023.

Our evidence says
A Green Wedge designation is a local policy constraint so is consequently awarded an Amber RAG rating in the Criteria Note of the SHELAA 2022/2023. This includes the river valleys and therefore recognises the contribution/value of these assets in the Criteria Note of the SHELAA 2022/23. This approach is in line with Local Plan policies and the IIA.
The impact on Flood Risk is not a capped constraint and is differentiated in the percentage area of the site affected in paragraph 4.17 of the Criteria Note of the SHELAA 2022/2023.
It was not considered appropriate to combine cycling/PROW with public transport.
Neighbouring constraints are explained in paragraph 4.20 of the Criteria Note of the SHELAA 2022/2023.

The Preferred Options Local Plan
The SHELAA assesses on a high-level basis the likely development potential of sites submitted by landowners and developers.
Paragraph 69 of the NPPF sets out that local authorities are required to undertake land availability assessments to establish an understanding of what sites within the administrative area may be suitable, available, and achievable for development.
The SHELAA serves as an evidence-based document identifying a wide range of site characteristics, highlighting the strengths and constraints that sites may face in achieving the local authority requirements and establishing the likelihood of site developability/deliverability. It is not the purpose of the SHELAA to allocate land for future development, that is for the Local Plan. The role of the SHELAA is discussed in the alternative for the proposed site policies identified for delivering the preferred Spatial Strategy.

Key statistics:

Question	Yes	No	Comments	Total number of responses
60. Do you support the approach taken to review the Spatial Strategy? If you disagree, please explain why.	32	17	59	108

Summary of Specific and DTC consultees comments:

- General support for the approach to the review or the need to review the Spatial Strategy (Essex County Council, Basildon Borough Council, Braintree District Council, Rochford District Council, Braintree District Council, Maldon District Council, South Woodham Ferrers Town Council, Chignal Parish Council, Writtle Parish Council)
- The review should lead to something conclusive that can be taken forward. Currently, the strategy just allows everyone to propose a site to be assessed on rules or approaches that cannot be measured or understood within the context of the Local Plan (South Woodham Ferrers Town Council)

- The review should reflect the new Vision for a greener approach to building stronger communities with community and transport infrastructure and improved health and wellbeing (Chignal Parish Council)
- Unclear whether the review is a fundamental review or whether it is just monitoring the outcomes of the Strategy so far and applying the same Strategy to updated circumstances. Support a more fundamental re-alignment of the Spatial Strategy because: a) There is now an even greater national emphasis on the need to reduce carbon emissions through transport; and a greater emphasis on well-being and quality of life; b) The new Vision is more about achieving ' a greener, fairer and more connected community and not so much about 'cementing the existing successes ..from growth' and from new City Status (Broomfield Parish Council)
- Welcome CCC meeting its full housing needs within its administrative boundary to 2041 including the 20% buffer. Any preferred spatial approach will need to have regard to the settlement hierarchy (Essex County Council)
- CCC should work with the Climate Change Unit to deliver on net zero and improve climate resilience by building with nature. It is important to embed climate change in local plan-making (Essex County Council)
- The carbon impact of the preferred spatial approach should be assessed and used to help steer the Spatial Strategy in a way which responds to the stated priorities on climate and ecological emergency and demonstrate alignment with local and national climate targets (Essex County Council).

Summary of General Consultees Comments:

- General support for the need to review the Spatial Strategy (North West Parishes Group, Chelmer Housing Partnership)
- The Chelmer Valley landscape is of great visual, natural, historic and archaeological interest and needs greater recognition and enhanced conservation. The Green Wedge should be extended to include more of the valley slopes. It is an ideal location to develop landscape scale nature recovery and an integrated approach to the historic and natural environment (Chelmer Valley Landscape Group)
- CCC should not rely on strategic sites and new settlements in the short to medium term given such allocations are often slow to come forward. This does not mean we do not support the delivery of new settlements, but it can often reduce the number of smaller sites allocated that are essential to supporting SME house builders (Home Builders Federation)
- Growth in allocated sites to west of the city is not agreed as local infrastructure especially roads is inadequate and cannot easily be upgraded resulting in overloading. Growth should be allocated where there will be good transport along transport corridors – North-East Bypass and A131/130 (Newlands Springs Residents Association)

Summary of Developer/Landowner/Agent Comments:

- General support for the approach to review or the need to review the Spatial Strategy (Bellway Strategic, Croudace Homes, Dandara, Taylor Wimpey, Taylor Wimpey Strategic Land, Obsidian Strategic Asset Management Ltd, Grosvenor Property UK and Hammonds Estates LLP, Richborough Estates, Gladman Developments Ltd, Gleeson Land, Cliffords Group Ltd, David Lloyd

Leisure and Aquila Development Ltd and Mr Mark Peters, Bolton, S&D, Pembridge Land Group, Rosehart Properties, Wates Developments Ltd, Inland Homes, Strutt and Parker (Farms) Limited, Redrow Homes & Speakman Family, Mr and Mrs Andrew Parker, A.G. & P.W.H Speakman, Chris Buckenham, Mr Alexander Micklem, Robert Robarts & Susan Balls, Wates Developments Limited)

- Simply continuing or extending the existing adopted Spatial Strategy, without a review, will be a much riskier approach, particularly as the existing strategy relies on a small number of very large allocations, which have long lead-in times and face significant challenges. The latest NPPF emphasises the contribution that small and medium sized sites can make and recognises that these sites are often built out relatively quickly (Croudace Homes)
- The timing of the new strategic transport infrastructure coming forward represents a strong opportunity for Chelmsford to take a holistic approach to new housing locations (Wates Developments Limited)
- There are a number of issues with the methodology and conclusions of CCC's assessment of the five spatial approaches. The approach to sites in ECC's Accessibility Mapping is not consistent. A suggested Potential Accessibility score has been attached (Grosvenor Property UK and Hammonds Estates LLP).

Summary of Public Comments:

- Agree with the principle of reviewing the Spatial Strategy
- Current Spatial Strategy is fit for purpose and does not need modification
- CCC has allocated development to South Woodham Ferrers without looking at the full picture of the area such as the need for new infrastructure and by carrying out traffic surveys at the wrong time of day
- Increase in traffic generated to the North of South Woodham Ferrers cannot be measured because the development does not yet exist, and the existing traffic studies are significantly flawed so there can be no confidence in any projections post development
- The proliferation of urban sprawl is detrimental to the character of the countryside. Hammonds Farm is typical of this encroachment of the town into the countryside
- Support the retention of the Green Wedges which are absolutely vital for the continued success of the city being an invaluable corridor for both people and wildlife
- Disagree with growth in allocated sites to the West of the city. Local infrastructure especially the roads are inadequate and cannot be upgraded to increase capacity resulting in overloaded and a congested road network. Growth should be allocated to sites where there are good transport links, along transport corridors and with access to the new railway station, and where the local infrastructure, particularly the roads, can be easily upgraded
- The agricultural land in West Chelmsford beyond Newlands Spring is excellent for that purpose. The UK needs to retain and increase its own agricultural especially in view of the effects of the war in the Ukraine. Chelmsford needs to take into account this bigger picture and play its part in a new way forward for the UK

- Stop the Sandford Mill development if you care about the planet. Politicians, councils and governments only care about money and the interests of big business. Your actions are contrary to your words
- Growth in allocated sites to west of the city is not agreed as local infrastructure especially roads is inadequate and cannot easily be upgraded. Growth should be allocated where there will be good transport along transport corridors – North East Bypass and A131/130.

Our evidence says
The Strategic Housing Needs Assessment (SHNA) 2023 supports the housing requirement of 1,000 new homes per annum for the preferred Spatial Strategy.
Experience has shown that applying a supply buffer of around 20% will help provide flexibility in the supply of housing sites and to ensure that the housing requirement is met.
The Employment Land Review 2023 considers current economic trends and future requirements for new employment floorspace up to 2041. The preferred Spatial Strategy proposes new employment sites totalling around 110,000sqm in addition to existing allocated employment sites in the adopted Local Plan. These seek to meet an employment land shortfall of around 110,000sqm (Scenario 3 in the review).
The Retail Capacity Study Update 2023 finds that there is no need to allocate new sites for retailing and that there are no significant gaps in the provision of larger commercial leisure facilities in the area. In line with the study, no proposed new retail allocations are proposed in the Preferred Options Local Plan.
The Parish Audit 2024 is a technical assessment of key services, facilities, and bus provision available to residents within villages and parishes across the Council's area. It supports the Settlement Hierarchy in the preferred Spatial Strategy.
The Local Plan Viability Report 2023 provides a high-level viability of different typologies of development sites that could come forward through Local Plan allocations. The assessment supports the site allocations in the preferred Spatial Strategy.
The Strategic Housing and Economic Land Availability Assessment (SHELAA) 2023 assesses land promoted for new housing and employment development. This is supplemented by the Urban Capacity Study 2024. The sites identified in the preferred Spatial Strategy are promoted for development and supported by the SHELAA 2023 and Urban Capacity Study 2024.
Drawing on the wider plan evidence base, national planning policy and guidance and the Issues and Options consultation responses to the five Spatial Approaches, three Spatial Strategies were developed for detailed technical testing in 2023. The Transport Impact Appraisal of Spatial Approaches 2023 assesses the relative impact of additional development traffic on the future capacity of links and junction on the road network of the three Strategies. The Landscape Sensitivity and Capacity Study 2024, considers the landscape sensitivity and resulting capacity for the development proposed in the three Strategies. The Water Cycle Study Scoping Report 2024 provides a high-level assessment of the three Strategies on water infrastructure. The outputs from the technical studies identify positives and negatives associated with each Strategy. The outputs have been used alongside other plan evidence and national policy, to inform the employment and housing

Our evidence says
site allocations included within the preferred Spatial Strategy which has been subject to further technical testing – see below.
The following traffic modelling has been undertaken: Sustainable Accessibility Mapping and Appraisal of Sites 2022 – this assessed 25 settlement areas identified across the five spatial approaches in the Issues and Options consultation document on their level of sustainable connectivity to key urban centres, employment, rail stations, bus services and bus stops, healthcare and education. They were also assessed on their digital connectivity highlighting the ability for residents to work from home thereby reducing peak hour journey trips on the local transport network. It should be noted that the appraisal assesses the current accessibility and connectivity of the locations and at this stage does not take into account future uncommitted infrastructure improvements which might come forward to support new development. Transport Impact Appraisal of Spatial Approaches 2023 – this sets out the modelling methodology, results, and findings of the traffic impact appraisal of three selected Spatial Strategy options, identified following the Issues and Options consultation. The evidence shows that, in terms of overall network impact (severity and breadth) and without considering the scope for mitigation, option 2 is modelled as having the smallest impact, and option 3 as having the largest. Option 1 is characterised as having a broader, but less pronounced impact on the road network. The wider cross boundary impacts are included in the relevant assessments. Transport Impact Appraisal of the Preferred Spatial Approach 2024 - sets out the modelling methodology, results, and findings of the traffic impact appraisal of the Spatial Strategy included within the Preferred Options. It concludes that impact on traffic is largely limited to the A12 corridor, the junctions along it and, to a lesser extent, the A1114 and A132 corridors into Chelmsford City Centre. Overall, the allocation of development in the Preferred Options consultation document provides the opportunity to make good use of existing and potential sustainable accessibility to and from proposed sites. However, this will be dependent on the delivery of the bus, cycling and walking infrastructure proposed, as well as additional measures required to provide the necessary connectivity to the wider sustainable transport network. This will be crucial to ensure that the growth in trips associated with the proposed development is managed and does not have a negative impact on the surrounding local area. By maximising the potential for sustainable accessibility to and from the sites along the A12 corridor, the impact on the strategic highway network should not be considered severe.
The Water Cycle Study Reports 2024 indicates no major concerns with respect to water supply to cater for proposed level of new growth. Chelmsford Water Recycling Centre (WRC) catchment, where the majority of development is being proposed for the plan period up to 2041, has significant spare capacity and can accommodate the proposed development including the East Chelmsford Garden Community, Bicknacre, East Hanningfield and the employment allocations. They also identify constraints to development growth in Chatham Green due to constraints at Great Leighs WRC. The studies support the preferred Spatial Strategy.
The Preferred Options IIA 2024 assesses positives and negatives associated with the preferred Spatial Strategy and reasonable alternatives in terms of sustainability, health and equality. The Preferred Spatial Strategy is assessed to

Our evidence says
be the most sustainable especially in terms making best use of previously developed land, meeting the housing need and supporting sustainable economic growth.
The Infrastructure Delivery Plan (IDP) 2023 supports the levels of growth and locations of growth over the new plan period and considers that the required new infrastructure improvement and investment is feasible and deliverable. Overall, the IDP supports the preferred Spatial Strategy.
The Housing Sites Schedule April 2023 details allocated sites for housing and non-allocated sites which have come forward in the planning process. It supports the proposed housing allocations in the preferred Spatial Strategy.

The Preferred Options Local Plan
The Preferred Spatial Strategy has been developed using national policy, relevant policies and strategies, engagement with key stakeholders, feedback from the Issues and Options consultation, and the plan evidence base including testing of options through the IIA (as described above).
The Preferred Spatial Strategy reflects the proposed updated Vision and Strategic Priorities of the plan including Strategic Priority 1 Addressing the Climate and Ecological Emergency.
The Preferred Spatial Strategy is an evolution of the five spatial approaches tested at Issues and Options stage and three Spatial Strategies tested in 2023.
Overall, the preferred Spatial Strategy meets housing, employment and Travelling Showpeople needs in full, protects the Green Gelt, and allocates new development in sustainable locations.
Unbuilt site allocations in the adopted Spatial Strategy including West of Chelmsford and North of South Woodham Ferrers have been rolled forward into the preferred Spatial Strategy as they continue to represent sustainable and sound development allocations.
The Preferred Spatial Strategy includes a mix of different types and sizes of site allocations that will come forward throughout the plan period.
Alternative Spatial Strategies and site allocations have been considered, tested and rejected as they perform less well than the preferred Spatial Strategy and site allocations. Discounted locations for further housing growth include South Woodham Ferrers, Boreham, Broomfield and West of Chelmsford. These are too constrained and unsuitable for further development growth over and above that in the adopted plan.
Further information on the approach to the Spatial Strategy and site selection is set out in the Preferred Options Spatial Strategy and Strategic Sites Topic Paper.
The Green Wedge boundaries are around the main river valleys as set out in the Green Wedge evidence base reports.

Key statistics:

Question	Yes	No	Comments	Total number of responses
61. Do you agree with the scope and classification of individual settlements within the Settlement Hierarchy? If you disagree, please explain why. Where possible, please support your answer with reference to any evidence.	33	13	42	88

Summary of Specific and DTC consultees comments:

- General support for the proposed Settlement Hierarchy (Essex County Council, Braintree District Council, Rochford District Council, South Woodham Ferrers Town Council, Writtle Parish Council)
- Supports the conclusions of the Sustainable Accessibility Mapping and Appraisal. If Spatial Approach E (including Hammonds Farm) were selected, consideration would be required as to where this would sit within the settlement hierarchy, and whether its position in the hierarchy would be phased relative to when key services are provided etc (Essex County Council)
- Boreham and Great Leighs are Key Service Settlements in close proximity to Great Notley and Hatfield Peverel in Braintree District. They are classified as a District Centre and Key Service Village respectively reflecting the significant population in that area, and the fact that they offer services which support nearby smaller communities, including residents from cross border communities. It is important to retain and improve services close to the communities they serve, and this can be helped by providing appropriate growth to support those services in terms of population and additional financial contribution to existing services (Braintree District Council)
- Disagree that South Woodham Ferrers is well-connected. It is unsuitable for any further large scale development which would mean further loss of open space/agricultural land and the green necklace (South Woodham Ferrers Town Council).

Summary of General Consultees Comments:

- General support for the Settlement Hierarchy (Newlands Springs Residents Association, Chelmer Housing Partnership)
- The use of the existing Settlement Hierarchy as a way of allocating new development in a sustainable way is not supported as it is too broad-brush and simplistic. All settlements are different (North West Parishes Group).

Summary of Developer/Landowner/Agent Comments:

- Support expressed for the proposed Settlement Hierarchy (Landvest Developments Ltd, Vistry Group, Dandara, Bellway Strategic, Bellway Homes Ltd, Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern), Richborough Estates, Marden Homes Ltd, Croudace Homes, Rosehart Properties Ltd,

Strutt and Parker (Farms) Ltd, Gladman Developments Ltd, Gleeson Land, Pembridge Land Group, Grosvenor Property UK and Hammonds Estates LLP, Cliffords Group Ltd and Mr Mark Peters, Mr Alexander Micklem, Robert Robarts & Susan Balls)

- Given the magnitude of difference between the scale and services of the city and the town of South Woodham Ferrers, it is worthy of its own separate classification (Dominvs Group)
- Owing to its vastly superior service provision and employment opportunities and its status as a regional centre, Chelmsford should sit alone at the top of the Settlement Hierarchy. It should be cited as Chelmsford Urban Area reflecting the glossary which confirms that Great Baddow, Springfield and Broomfield form part of the Chelmsford Urban Area and reflecting the excellent sustainability credentials of these areas (Martin Grant Homes)
- There should be an updated Settlement Hierarchy study. Broomfield is much better connected to the main regional centre of Chelmsford. It contains the Council's largest single employer, Broomfield Hospital, a secondary school and other services. It would be more appropriate to have a top tier – "Greater Chelmsford", with Broomfield and South Woodham Ferrers at the second tier (Obsidian Strategic Assess Management)
- The most sizeable proportion of new growth should be directed to Chelmsford City, which provides the greatest opportunity to address the Council's Strategic Objectives at scale, and in a way that is most sustainable. This is supported by the Employment Land Review (2015) and the IIA (Dandara)
- The Spatial Strategy should be strongly informed by the proposed Settlement Hierarchy (Bellway Strategic)
- The 'category' names used within the Settlement Hierarchy do not align with the 'location types' used with the growth approaches outlined by the Council in the Issues and Options document (Pegasus Group)
- Boreham should be identified at a higher level in the Settlement Hierarchy than other Key Service Settlements or at least as a higher priority for development due to the new rail station and employment nearby in Springfield and planned at Beaulieu Park (Wates Developments Limited)
- Given CCC's objective to maintain protection of the Green Belt, it is important that the distinction remains between Key Service Settlements within and outside the Green Belt. This creates an 'A' and a 'B' list of Key Service Settlements ensuring that growth is distributed to the most sustainable locations (Bellway Homes Ltd)
- Rettendon Place could become a 'Key Service Settlement' in due course. Disagree with some findings presented in ECC's Sustainable Accessibility Mapping & Appraisal. The findings for "SA6e. Rettendon Place" in Appendix E of the Technical Note should be amended to address a number of errors which will lead to the Site Average RAG Score for increasing from 1.43 (Red) to 1.79 (Amber) (Croudace Homes)
- Chatham Green has scored 1.79 in Essex Highways Sustainable Accessibility Mapping Appraisal of the New Local Plan Review for Sustainability. This score is higher than many bigger villages including Great Leighs. The classification of individual Settlements within the Settlement Hierarchy should be changed to allow smaller sustainable settlements such as Chatham Green to be considered for development (Mr & Mrs Andrews)
- Note the potential of new development to increase the sustainability of a settlement which would change its position in the hierarchy such as Chatham

Green which has the potential to become a service settlement (Strutt and Parker (Farms) Ltd)

- The Settlement Hierarchy should be used as a guide, and not as a robust tool, to inform the Spatial Approaches. For example, Chatham Green is identified as a small settlement and is typically categorised as a less sustainable settlement based on its limited facilities. However, through the emergence of planned strategic infrastructure (Chelmsford North East Bypass) and potential associated strategic level growth of a critical mass to deliver community infrastructure, the sustainability of a smaller settlement should be viewed in a wider spatial context (Mr Alexander Micklem)
- Query the clarity of Table 8 and Approach C as to exactly which settlements are to be regarded as "Smaller Settlements". The six "Smaller Settlements" listed in Approach C are the "Service Settlements" in Table 8, but these are different villages to the "Smaller Settlements" in the Adopted Local Plan (Edward Gittins Associates).

Summary of Public Comments:

- Support expressed for the proposed Settlement Hierarchy
- Ford End should not be classed as a Service Settlement as the only 'service' available is a small village school. It is a small village and should be classified as a small village only
- Smaller villages need to be protected to ensure they remain distinct and are not built into a super urban area. Chelmsford has swallowed Writtle, Broomfield and Sandon and is now encroaching on the Walthams, Boreham, Great Leighs and Danbury. In 20 years, there will be no obvious boundary between Maldon, Chelmsford, Witham and Braintree
- Some of the "larger" villages are already at the maximum point of size (schools, doctors, traffic etc). Better to put development in Chelmsford where people can walk or cycle to all services
- Writtle may have a few services, but these are diminishing as businesses close and as services become overloaded. There is also little opportunity for expansion within the village boundaries themselves so should it be declassified or have a finer grain of settlement classification?
- Consider that Rettendon Common has been thought to have facilities which is does not have. If more houses are put here, there will be more traffic on the A1245, the Turnpike and East Hanningfield Road, which is already a problem with fast cars.

Our evidence says
The Parish Audit 2024 is a technical assessment of key services, facilities and bus provision available to residents in the settlements across the Council's area, excluding Chelmsford and South Woodham Ferrers. It concludes that the amount and types of services and facilities for each settlement remains very similar to the 2018 Audit which informed the adopted Local Plan. The 2024 Parish Audit supports the Settlement Hierarchy in the preferred Spatial Strategy.

The Preferred Options Local Plan
In accordance with the Parish Audit 2024, no changes have been proposed to the Settlement Hierarchy. Likewise, all settlements fit within the definitions of the different categories of settlements provided in the Audit and it is not considered necessary to provide any additional tiers or amended categories as suggested by some respondents.
No additional growth is proposed in South Woodham Ferrers over and above that allocated in the adopted Local Plan.
Distributing growth based on the settlement hierarchy (amongst other considerations including site availability and constraints) is an appropriate approach.

Key statistics:

Q62. How do you feel about the types of locations for potential housing development growth?

	Strongly support	Support	Neither oppose or support	Oppose	Strongly oppose	Comments
Growth in urban areas	38	20	6	0	4	652
Expanding allocated sites	10	19	15	9	13	
Growth along transport corridors	20	24	18	6	4	
Development at larger villages	11	21	17	13	12	
Development at smaller villages	4	13	12	18	21	
Large new settlement/garden community	19	10	9	31	486	

This question focused on the type of location as set out in the above table, to which many respondents addressed their comments. However, the same section of the document (Part 6) set out the five potential Spatial Approaches. Each of these comprised a mix of the types of location, and therefore drew specific comments to those Approaches. The summary comments below are ordered by the Spatial Approaches, the type of location, followed by other comments, for each of the consultee groups.

Summary of Specific and DTC consultees comments:

Approach A, and mixed approaches

- Development at Danbury & Bicknacre and to the East of Chelmsford would have a higher degrading effect on the road users (both bus and car) of South

Woodham Ferrers; place a significant weighted increase on the A12/A130 junctions and the 'back-roads' from South Woodham Ferrers to Chelmsford; and require multiple car transports for the average family (South Woodham Ferrers Town Council)

- A and B - development in the city centre and at the Chelmsford Garden Community is logical; expansion in East and West Chelmsford can be accommodated within existing infrastructure; limited expansion of Boreham, Broomfield, or Great Leighs could be accommodated, but Danbury and Bicknacre are at capacity. Concern is for South Woodham Ferrers infrastructure where rail services are running at optimum levels and the single carriageway A132 through Rettendon Turnpike is at hopelessly congested levels now (Rettendon Parish Council)
- A and C – any further allocation of housing to Danbury would not be sustainable; the Neighbourhood Plan is allocating sites for around 100 houses and has selected those with the least impact on the A414, rural/protected lanes, heritage and environmental assets, landscape and the Air Quality Management Area; other sites are significantly constrained; growth in the settlements that are served by Danbury would also impact on traffic, local services, and recreational pressure on the Sites of Special Scientific Interest (SSSIs) (Danbury Parish Council)
- A, C and E - would have a significant impact on the road network leading to Maldon and Burnham, not only the main roads but also the rural road network; particular concern over the level of development proposed in South Woodham Ferrers, Woodham Ferrers, Bicknacre and in and around Danbury and impact on inward and outward traffic flows for employment and education purposes (Maldon District Council)
- A to D – each propose additional houses at South Woodham Ferrers, with a detrimental effect on the only major route to and from the Dengie. The B1012/A132 is a key road corridor, including for Dengie residents who are highly dependent on it for commuting, commercial deliveries, and emergency services. Concerned about the impact on emergency response times for ambulance and fire services (North Fambridge Parish Council)
- A to D - although no housing growth is indicated for Chignal parish, development in the neighbouring parishes could impact Chignal's rural landscape and identity and have visual impact on the Pleshey and Writtle Farmland Plateau, increase rat running traffic on narrow rural lanes and add to the pressure on already stretched community services such as GP surgeries and primary schools (Chignal Parish Council)
- A to D - further expansion of West Chelmsford is not supported, and the current plans for 880 houses should not be exceeded; a larger allocation was rejected during previous consultation (Writtle Parish Council)
- A to E - any future expansion of Chelmsford Garden Community area must be undertaken with regard to the capacity of infrastructure and roads and the impact on local services including health provision and schools (Little Waltham Parish Council).

Approach B

- Potentially provides the least carbon intensive approach but would need to be supported by a whole life carbon assessment (Anglian Water Services)
- Unclear as to why only option B seeks to fully optimise growth in the city centre by aiming to secure 2,500 new homes there, when all other options

only seek to secure an additional 1,000 homes in this location. Optimisation of brownfield sites in town centre locations is supported (Castle Point Borough Council)

- Would best serve the residents of South Woodham Ferrers, apart from possible degradation of the peak time train through service to London due to extra track slots being required to carry more commuters from Chelmsford. It would attract less road use of all the options, more cycle use, and more car-pooling (within the central city area). In addition, the small development to the East of Chelmsford may assist South Woodham Ferrers in receiving a better bus service. 1,500 properties in total is sufficient for this site (South Woodham Ferrers Town Council)
- Favoured for its combination of growth in urban areas and expansion of allocated sites (Springfield Parish Council).

Approach C

- Do not believe that developing numerous smaller sites will be beneficial to those communities. Effectively, there would be 7 communities that would have increased residential use, and this would place a high burden on all the roads between South Woodham Ferrers and Chelmsford (South Woodham Ferrers Town Council)
- Adding more housing to the 118 houses that have permission (adding 25% to the current housing number) would overwhelm the local infrastructure and destroy the character of the village. The school has no additional capacity, and the shop cannot expand (East Hanningfield Parish Council)
- Chelmsford Garden Community remains logical but reducing the number in the city centre misses a golden opportunity to fully develop brownfield options close to all facilities. East and West expansion remain a favourite given the proximity of facilities and networks there. Limited expansion of Boreham, Broomfield, or Great Leighs could accommodate development with current road networks, but Danbury and Bicknacre are at capacity already (Rettendon Parish Council)
- Development in the Smaller Settlements will cause difficulties due to lack of infrastructure even if spread equally to all 6 settlements. Concerns about Rettendon Place proposal due to poor access, extensive street parking causing access problems; lack of adequate infrastructure; cannot sustain a further doubling of homes. Better to carefully consider modest expansion of each village envelope to allow organic growth of developments of 5-10 units (Rettendon Parish Council)
- C and D - unlikely to be as sustainable as other approaches in terms of capital carbon and investments required in future infrastructure requirement (Anglian Water Services).

Approach D

- Opposed to the potential development of Chatham Green, a small rural hamlet of considerable charm with a number of listed properties. Development would be detrimental to the historic character and appearance of the area and would overwhelm the hamlet, which should be preserved rather than developed (Little Waltham Parish Council)
- Would cause extreme problems for the A130 and connecting to it as well as turning the old A130 into a major road again, resulting in more congestion at Rettendon Turnpike and at the A130/A12 interchange. It’s already poorly

designed and will carry a lot more traffic when the Lower Thames Crossing, and the Chelmsford North East Bypass open. It creates largely isolated communities away from the current urban areas (South Woodham Ferrers Town Council)

- Concerns relating to infrastructure, development, retail and commercial (Galleywood Parish Council)
- Support, apart from the inclusion of West Chelmsford which does not fit with the locations on transport corridors in this Approach (Writtle Parish Council)
- Development at Chatham Green, Howe Green and Rettendon Common is not supported – all have already been extensively developed with very limited infrastructure and facilities. Rettendon Common has a poor road network without access/junction to the A130, so all traffic has to use the old road. There is no school, doctors nor shopping facilities in Rettendon Common; local transport is either infrequent or non-existent (Rettendon Parish Council)
- D and E - there are existing capacity challenges at the junctions along this route, we wish to understand how these issues have been considered and addressed as a part of the spatial approach (Castle Point Borough Council).

Approach E

- Would require significant infrastructure but it offers significant opportunities for a sustainable, zero carbon community where integrated water management can be delivered from the outset e.g. community rainwater harvesting and water reuse. The lead-in times for new settlements are considerable and only a proportion of the growth required for the plan period could be accounted for if this strategy is selected (Anglian Water Services)
- It will become a car-centric development despite all the schemes promoted to alleviate it; attract all the available infrastructure investment for many years; prioritise solving the Dengie area traffic problem through Danbury rather than through South Woodham Ferrers; create a burden for the road systems east of Chelmsford without the benefits of city centre living; and cause the loss of a large area of green/agricultural land at a time when the UK should be considering how it can be more self-reliant on food production (South Woodham Ferrers Town Council)
- Oppose for multiple reasons:
- Transport infrastructure - including minor and major arterial roads and A12 congestion; the potential impact of the creation of a new rail station at Boreham; completion of the development of additional housing and related development in Northeast Chelmsford; pressures arising from further development at Maldon and Heybridge; creation of an East-Chelmsford bypass; impact of the new Thames underpass to Kent; the A414 through Danbury traffic modelling has shown acute pressures arising at peak times from traffic travelling between Maldon and Chelmsford, and beyond; impact on protected lanes; impact on traffic in Boreham itself; potential traffic for power station construction
- Infrastructure - existing schools are at full capacity; the existing medical practice is struggling to meet community needs; Danbury has only small shops with limited parking; there are restricted Leisure facilities (Danbury community hall and sports field and Paper Mill Lock) which are at capacity
- Other Considerations - the A12, and the Chelmer and Blackwater Valley, together provide a natural and coherent eastern boundary to Chelmsford and should be used to limit to strategic development avoid urban sprawl;

development would have a profoundly destructive effect on the countryside; farmland should be retained for food production; a new settlement is likely to be harmful and destructive of the integrity of that community (Little Baddow Parish Council)

- The reasons that Hammonds Farm was rejected following assessment for the adopted Local Plan are still valid; concerns about traffic flows, loss of a buffer between Sandon and the A12, increased pressure on services (Danbury Parish Council)
- The best fit with the Spatial Principles, and would be a well-planned sustainable development (Chignal Parish Council)
- A preferred area that can take around 12,000 homes and would be best placed in the next local plan from 2036, the favoured option is Option E and then after that Option B and then option D. The Parish Council are looking for minimal further development to be considered for the Leighs area of the plan, due to designated development already included (Great and Little Leighs Parish Council).

Other comments

- Propose a combination of elements from Approaches B (Chelmsford City Centre and Urban Area at 2,500), D (Howe Green and Rettendon Common at 1,500) and E (North East Garden Community at 4,500) – to exceed the 8,000 shortfall (Writtle Parish Council)
- A full housing scenario test will be needed to assess the impact of and suitability of individual development sites, particularly in terms of available school capacity, need for new schools, expansion of existing schools, and any need for school transport (Essex County Council)
- Large-scale development will be expected to provide for the needs of post 16 education, and Special Educational Needs (Essex County Council)
- Increased density of development should maximise sustainable movement infrastructure, and more innovative ways to tackle behavioural change, rather than by simply monitoring travel patterns (Essex County Council)
- High density or taller buildings should be equipped to re-use rainwater to fulfil community's water demand (Essex County Council)
- Growth within the Key Service Settlements and Service Settlements should be at a level that helps to secure the delivery of viable and sustainable infrastructure. Where there are groups of smaller settlements, development in one village may support services in a village nearby (Essex County Council)
- A whole life carbon assessment could help inform the optimal spatial distribution of growth for Chelmsford, including whether a combination of approaches would be more suitable to achieve positive benefits towards a net zero carbon society (Anglian Water Services)
- If the level of additional growth proposed to 2041 in the new plan and existing planned growth in the adopted Local Plan leads to a higher population this would have implications for the medium and long-term strategy. Dependent on the spatial approach taken, there could be implications for growth at South Woodham Ferrers and Great Leighs Water Recycling Catchments (Anglian Water Services)
- Capacity for growth whilst maintaining an area's historic environment should be a key consideration, so that the quality and character of neighbourhoods, towns and villages is conserved. The density, scale, character and detailed

designed of new housing be appropriate for its context. The historic environment is a critical factor in this analysis in terms of considering the ability of sites and locations to accommodate new housing without undue harm to heritage assets and their settings – both for new sites and expanding existing allocations (Historic England)

- The Chelmsford North East bypass is only planned to be a single carriageway road and therefore there is doubt over whether it would be able to cope with increased traffic capacity (Little Waltham Parish Council)
- Consideration should be given to the capacity of roads and the modelling of junctions and roundabouts to mitigate the impact upon neighbouring areas (Great Notley Parish Council)
- Consideration should be given to the impact upon school and health facilities locally so that existing schools and GP surgeries are not overwhelmed (Great Notley Parish Council)
- Strong support for locating development outside of Green Belt locations. Proposals for development to the south of the city in locations including South Woodham Ferrers and Rettendon Common could impact on the need for infrastructure within Basildon Borough - joint working between the Local Planning Authorities is envisaged (Basildon Borough Council)
- Growth should be of a scale which is capable of delivering the necessary service and infrastructure. Pepper potting of development should be avoided as this would not provide the necessary quantum of growth to do that (Braintree District Council)
- There tables listed under each Approach for North East Chelmsford Garden Community indicates the number of indicative new homes, as well as the 3,000 within the adopted Local Plan. This adopted plan number is not shown for the allocated sites at South Woodham Ferrers or West Chelmsford and East Chelmsford – this would have been useful for consistency (Maldon District Council)
- Would welcome further clarification of the long term expansion and timetable proposed for North East Chelmsford Garden Community at Para 6.41 (Springfield Parish Council)
- We expect to work together to ensure that the growth options for both authorities integrate appropriately (Maldon District Council)
- Colchester City Council welcome continued discussion on strategic matters such as housing need, transport, infrastructure and Gypsy and Traveller accommodation through existing joint working arrangements and wish to continue to be engaged in discussion on strategic matters as part of the Local Plan process (Colchester City Council)
- Encourage CCC to promote a strategy that makes best use of previously developed land and areas with the best access to infrastructure, including both built facilities and the strategic road and sustainable transport networks. Important to ensure compatibility with Brentwood's own emerging Local Plan, and understand likely cross-boundary impacts (Brentwood Borough Council)
- Would like to see an assessment of the impact of the five different scenarios on carbon reduction energy/water usage. The route to net zero will largely be affected by to traffic movements at the strategic scale but an assessment of the policy content and high-level infrastructure requirements arising from the spatial options at the more detailed development level would be instrumental (Uttlesford District Council)

- The strongly preferred option of development is along the A12 rather than anywhere in South Woodham Ferrers (Stow Maries Parish Council)
- Concerned about the impact on Boreham and other local villages. Boreham should remain a village separated from Chelmsford by green space, and its character protected. Recent development has resulted on the Primary School and GP Surgery reaching capacity. Village roads are very congested with local and passing traffic. Boreham and the surrounding road network cannot support any additional significant housing development (Boreham Parish Council)
- Broadly support growth in urban areas on the basis that they provide easy access to a range of facilities, from stations to small shops (Broomfield Parish Council)
- Concerned that the Local Plan does not afford the Chelmer River and Valley the same protections and status as other local rivers even though the length of the Chelmer Blackwater Navigation is a conservation area (Boreham Parish Council)
- The more logical option to make provision for local needs in such settlements as Rettendon Common and others in this category will be to carefully consider modest expansion of each village envelope to allow organic growth of developments of 5-10 units - rather than the imposition of a huge 1,500 or even 500 homes. Also, Rettendon Place and Rettendon Common has already and is continuing to benefit from the St Lukes development in Runwell for affordable housing (Rettendon Parish Council)
- There may be some merit in adding small numbers of houses to some existing larger villages to support community facilities and services such as village schools, but this needs the support of those communities (Chignal Parish Council)
- Support the focus on growth in urban areas and the expansion of allocated sites, but have a preference for avoiding developments in villages. Support the process of identifying different Spatial Approaches, but not all of the proposed Approaches (Great Waltham Parish Council)
- It is of concern that four of the suggested approaches include expansion of existing allocated sites. It is hoped this is not indicative of a ‘business as usual’ approach given the urgent need to re-balance transport in a more sustainable direction (Broomfield Parish Council)
- Encourage a strategy that makes the best use of previously developed land and areas with the best access to built facilities and the strategic road and sustainable transport networks. Acknowledge the advantages of planning at scale, and broadly support expanding Chelmsford Garden Community. Support further engagement as the review progress to ensure broad compatibility with Rochford District Council’s emerging Local Plan strategy, in particular impacts on shared infrastructure such as transport corridors (Rochford District Council).

Summary of General Consultees Comments:

Approaches A to D

- A to C - great care should be taken to ensure that any physical or visual intrusion into the Chelmer valley is avoided (Chelmer Valley Landscape Group)

- D - this seems to be the best option, as it appears that development would avoid the valley (Chelmer Valley Landscape Group).

Approach E

- Would have a severe adverse impact on the Chelmer Valley, introducing urban development would be a major physical and visual intrusion; it would greatly increase traffic in the valley and increase visitor pressure at hotspots; the Chelmer Valley is one of Chelmsford's key environmental and cultural assets (Chelmer Valley Landscape Group)
- The A414 is already at full capacity, particularly at Danbury, and with increased traffic from developments south of Maldon and the proposed route for construction traffic from the proposed nuclear power station at Bradwell, the situation will become quite untenable (Little Baddow Society)
- The Chelmer Valley is unique both for its natural landscape beauty and its profusion of wildlife (Little Baddow Society)
- The popularity of the Chelmer Blackwater Navigation for swimming, water sports and informal recreation displays a social need for the benefits of the natural environment (Little Baddow Society)
- The worst of the approaches, which would have a significant effect on Boreham sandwiching it between major development of Beaulieu Park, Chelmsford Garden Community and Hammonds Farm Development and would ruin Boreham Village and its setting above the Chelmer Valley Conservation Area (Boreham Conservation Society)
- The Bradwell B project has identified land near J18 of the A12 as a potential park and ride facility (one of 6 search areas) which would reduce traffic impact on Danbury. Although detailed preparation has paused, we request to be kept up to date on any development proposals (Bradwell Power Generation Company Ltd).

Growth in urban areas

- Strongly support, as they benefit from a good range of existing facilities, including sustainable transport hubs. There is also an opportunity to re-allocate land use and ensure that urban areas remain attractive and vibrant (North West Parishes Group).

Expanding allocated sites

- Strongly oppose as larger allocated sites (West Chelmsford and north of Broomfield) were rejected for good reasons. They are further away from the city centre, leading to longer, less sustainable journeys, and overall, they are not supported by sustainable transport infrastructure (North West Parishes Group)
- Broadly oppose. The capacity of allocated sites was determined through a rigorous process, including independent examination, so they should only be expanded where fresh study demonstrates there are clear benefits for service provision and that constraints (such as roads) allow. We oppose the further expansion of the West Chelmsford and 'north of Broomfield' allocated sites (Broomfield Parish Council).

Growth along transport corridors

- Strongly support to limit carbon and realise the new Vision (North West Parishes Group

- Strongly support, especially where these include sustainable transport such as rail (Broomfield Parish Council).

Development at larger and smaller villages

- Support an approach where each village is audited, in collaboration with the local community, to identify feasible growth opportunities; and oppose an approach that villages of whatever size should automatically expand. Opposed to the notion that Key Service Settlements should automatically expand, which has had limited success in the adopted Local Plan (North West Parishes Group
- The size of the village is irrelevant, but whether it would be sustainable. Strongly oppose the idea that larger villages should be expanded simply because they are larger (Broomfield Parish Council).

Large new settlement/garden community

- Strongly support if it is located close to existing/planned transport corridors (North West Parishes Group, Broomfield Parish Council)
- It is important for this one to start before 2041, even if the majority of housing is achieved in the following review period (North West Parishes Group)
- Strongly support the concept of Hammonds Farm, due to the advantages of a garden community, location close to the new Beaulieu rail station and the A12 and A130 (Broomfield Parish Council).

Other comments

- The selected approach should aim to minimise physical or visual intrusion into the valley landscape; minimise additional traffic into and through the valley; preserve the character of views from north, south and along the valley (Chelmer Valley Landscape Group)
- Boreham needs recognition of its special character and value and new developments should be sustainable and where possible be on brownfield sites or low grade farmland; if numbers were limited to that which can be accommodated within the Village envelope, then this may be workable (Boreham Conservation Society)
- Green Belt land to the south and south-west of Chelmsford should be considered (Newlands Spring Residents Association).

Summary of Developer/Landowner/Agent Comments:

Approach A and mixed approaches

- A to C – strongly supported. Extending the West Chelmsford allocation can evolve long term and deliver the same benefits that north-east Chelmsford is delivering (Taylor Wimpey)
- A to C – strongly supported as sustainable options to utilise, support and expand infrastructure; aligns with Strategic Priorities (Redrow Homes and Speakman Family); and to reinforce Chelmsford's role as the main centre; to provide significant benefits through access to services; would reinforce the role of the Green Wedge; would realise best in class transport network (Dandara)
- A to C – strongly support, it has been identified that delivery of over 6,000 homes will be possible at Chelmsford Garden Community within the adopted

allocated land, allowing CCC to maximise the delivery of homes on allocated land and reduce the need for further development on greenfield land elsewhere (Chelmsford Garden Community Consortium, Countryside Partnerships)

- A and C preferred as they would balance growth in terms of locations and scale (Wates Developments Ltd)
- A and C – strong support for their ability to relieve pressure on urban areas. Evidence should be provided for two different figures shown (Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern))
- A and C – broadly supported, to deliver a balanced Spatial Strategy with an appropriate scale of allocations in sustainable settlements (Graham Dines)
- A and C – Great leighs could accommodate the higher figure of 1,500 homes due to sustainability improvements from allocated sites coming forwards (Bellway Homes Ltd)
- A and C – could also explore sites in the Green Wedge as part of a robust review (Miscoe Enterprises Ltd, Cliffords Group and Mr Mark Peters)
- A, C, D and E – these should be consistent with Approach B i.e. 2,500 dwellings in all scenarios (Essex Police, Fire and Crime Commissioner)
- Approaches A and B would each build on and strengthen the existing adopted Spatial Strategy, whilst Approaches C, D and E would, to differing degrees, weaken elements of that existing strategy (Ptarmigan Chelmsford A Limited)
- Welcome a flexible approach recognising that there are several ways to accommodate growth, and therefore support seeking to distribute growth to several different potential locations (A.G. & P.W.H Speakman).

Approach B

- Cannot support as it does not reflect the opportunity for the Local Plan to deliver sustainable development at the edge of urban area locations. Development requirements and the limited number of available brownfield sites will mean that greenfield land adjacent to the urban areas will be required to accommodate growth (Martin Grant Homes)
- Support for the focus on previously developed land within the urban area of Chelmsford, and the benefits of development in sustainable locations (Essex Police, Fire and Crime Commissioner)
- The best approach, but the figure quoted could be exceeded over a 19 year plan period; it provides the greatest annual growth in the city centre; and could support retail, cultural and leisure growth and public realm improvements (Dominvs)
- Unrealistic, and may lead to high density and apartments, which may not meet identified needs (Richborough Estates)
- Makes the most of the good levels of sustainable accessibility in these locations and therefore ranks a clear first in the comparison of Spatial Approaches. The principal of development to the south-east of Chelmsford is therefore supported (Greystoke CB)
- Is solely reliant on Chelmsford and existing allocations being expanded and places a heavy reliance on Chelmsford Garden Community coming forward at a high rate of delivery. This does not lend itself to a balanced mix of sites, or a choice of locations for future residents in terms of scale or location (Wates Development Ltd).

Approach C

- The most sustainable because it distributes housing across the area giving geographical diversity and a choice of housing types, with more certainty of early delivery (Inland Homes)
- The most suitable, although it neglects the Green Belt. Unlike the other approaches it does not result in heavy reliance on large sites; has shorter lead-in times; facilitates growth in smaller settlements and supports services (The Howgego Trust)
- Supported as it will support objectives for urban growth and renewal as well as ensuring the continued vitality of rural communities and settlements (Chris Buckenham)

Approach D

- Do not support the notion of strategic scale growth being directed away from the city at the expense of more sustainable options; it would enhance the viability and vitality of well-connected existing villages, but this should be part of a balanced spatial strategy (Dandara)
- Should include growth along the A12 within the transport corridors (Bolton, S&D), including for employment allocations (Gray & Sons)
- Broomfield should be allocated a greater number than other Key Service Settlements which are less sustainable (Persimmon Homes)
- Support, but CCC has underpromoted the true potential and scope for sustainable strategic growth of new housing, jobs and infrastructure close to existing and planned strategic infrastructure and the broader strategic road network. Inclusion of Chatham Green supported due to its ability to accommodate a significant scale of growth, and deliver social and physical infrastructure for new and existing communities (Alexander Micklem)
- Strongly support, because the additional allocation for Chelmsford Garden Community would allow for a shift in urban design over time, which could allow for more dense forms of development (Chelmsford Garden Community Consortium, Countryside Partnerships)
- Support; the potential capacities for East and West Chelmsford have been reduced but there is more scope here to provide a greater number of homes in already established locations that would not compromise designated landscapes or ecological areas (Redrow Homes and Speakman Family)
- Question why Great Leighs is not included in this approach (Tritton Farming Partnership)
- This approach, and specifically allocating growth to Chatham Green, will allow the opportunity to benefit from planned infrastructure improvements already approved. This ensures that growth can be delivered at an early stage in the plan period. This should complement other aspects of the spatial option, including larger scale urban extensions and smaller, brownfield developments, which are recognised as sometimes taking longer to develop (Strutt and Parker (Farms) Limited)
- No evidence to suggest that the required level of infrastructure, services and amenities proposed as part of the existing North East Chelmsford Garden Community allocation would be able to accommodate such a large increase in the number of houses; it also fails to meet the housing needs of larger villages (Richborough Estates)

- The Chelmsford North East Bypass should also be included as a transport corridor (Cliffords Group Ltd)
- Provides access to London and other areas of Essex, but it should instead focus on local employment opportunities (The Bucknell Family, Pigeon (Sandon) Ltd)
- Has the potential to provide a more balanced approach to growth across the Chelmsford area than options B or E but is still significantly less balanced and flexible than options A or C since growth outside of urban areas or allocated sites would be restricted to growth along transport corridors. Such an approach would be at strong risk from any delays to the delivery of planned new strategic transport infrastructure (Wates Developments Limited).

Approach E

- Would cause significant harmful environmental impact compared with some modest changes to the Green Belt on the edge of Chelmsford in sustainable locations (Rosehart Properties)
- Cannot be supported as it does not reflect a balanced Spatial Approach. Housing growth is needed on a variety of scales and in different locations to support the vitality of local services and provide housing choice for residents (Martin Grant Homes)
- Such major allocations can be subject to delays and viability issues, which could place the future housing land supply of the Council at risk and fail to meet housing needs (Martin Grant Homes, Richborough Estates)
- The least sustainable and the least aligned to the Vision and Strategic Priorities; less likely to encourage sustainable transport; and would create unnecessary over-reliance on one approach (Dandara)
- Scores poorly in the SHELAA assessment, and so is not suitable (Persimmon Homes)
- Not supported as the potential further allocation of only 3,000 homes at Chelmsford Garden Community would not optimise the housing delivery on site (Countryside Partnerships).

Growth in urban areas

- Important to ensure that sites allocated on brownfield land are viable and deliverable; the supply of suitable brownfield land is limited and certainty of delivery is needed; density should be appropriate to location; parking standards be realistic; policy requirements should not make sites unviable (Gleeson Land)
- Strongly support as the main focus for major residential development should be in and around the city (Vistry Group)
- Supported, although brownfield sites are likely to deliver smaller accommodation units rather than family houses (Bellway Strategic)
- An opportunity for modest growth which would reduce reliance on private vehicles and be supported by infrastructure, to enable the delivery of growth over short timescales and on low risk, viable sites (Sempra Homes Ltd, Mr A Smith).

Expanding allocated sites

- Needs to ensure there are sufficient services and facilities to support additional homes, or has a sensible size already been reached (Gleeson Land)
- Strongly oppose because of placing reliance on a small number of large allocations, with long lead in times and delivery challenges e.g. North East Chelmsford where mineral extraction, land restoration and development would need to take place before any further allocation can be delivered (Croudace Homes)
- Oppose because there is a lack of evidence to demonstrate it would be suitable and deliverable within the plan period without adversely affecting the communities already planned (Vistry Group)
- Does not necessarily mean additional land take, as there may be opportunities (such as at South Woodham Ferrers) to optimise dwelling delivery within existing allocation boundaries; Countryside have successfully achieved this at other strategic allocations without any adverse impact on design quality or the original design vision for the new communities, minimising the loss of greenfield sites, and maximising the benefits of investment in infrastructure (Countryside Partnerships)
- Supported to help ensure that important infrastructure is delivered, and to provide new homes in sustainable locations and reduce pressure for growth to other larger and smaller villages which may be disproportionate to their existing scale and facilities (Marden Homes Ltd).

Growth along transport corridors

- Support, although Rettendon Place should be identified rather than Rettendon Common (Croudace Homes).

Development at larger villages

- Greenfield sites on the edge of settlements can deliver sustainable development with an attractive environment; provide a range of new homes people want to live in, with easy access to local services and facilities, as well as open space for recreation and mental wellbeing (Gleeson Land)
- Strongly support as they are capable of accommodating additional residential development commensurate with their role and status in the settlement hierarchy (Vistry Group, Bellway Strategic, Medical Services Danbury, A.G & P.W.H Speakman)
- An opportunity for modest growth which would ensure continued support of existing services and facilities whilst not incurring wholesale infrastructure requirements, to enable the delivery of growth over short timescales and on low risk, viable sites (Marden Homes Ltd).

Development at smaller villages

- May be appropriate if they are of a scale commensurate with the existing size of the village to ensure new development can be properly integrated (Gleeson Land, Richborough Estates)
- Strongly support to reinforce and enhance the vitality and sustainability of smaller villages (Chris Buckenham, Croudace Homes, Cliffords Group Ltd, C J H Framing Ltd) and reduce the need to travel to other centres (Croudace Homes)

- A very modest amount of additional housing provision might be appropriate in order to meet local needs, but not a substantive level (Vistry Group, Bellway Strategic)
- Should not be limited to settlements with defined settlement boundaries, but also smaller settlements and hamlets to complement other approaches (Mr & Mrs Richard and Sally Speakman).

Large new settlement/garden community

- Strongly support due to the benefits of housing and employment delivery in comparison to alternative approaches. Potential to deliver 4,000 homes in plan period and 1,500 later, with an opportunity for significant investment in infrastructure including sustainable low carbon transport (Grosvenor Property UK and Hammonds Estates LLP)
- Welcome the consideration of a large new settlement at Hammonds Farm and that the preferred approach is likely to be a combination of the most sustainable and deliverable elements of each of the five Spatial Approaches. Hammonds Farm has the potential for delivery under a number of scenarios, and is complementary with the Chelmsford Garden Community, with the ability for the two settlements to utilise shared infrastructure (Grosvenor Property UK and Hammonds Estates LLP)
- Needs to be carefully considered; new Garden Communities are often very complex and prone to delays; a high degree of certainty for delivery would be needed (Gleeson Land)
- Strongly oppose because it is the worst performing approach according to ECC's Sustainable Accessibility Mapping & Appraisal: Technical Note (July 2022) and would not enhance the sustainability of any of the existing settlements in the local authority area (Croudace Homes)
- Strongly oppose due to not being able to deliver in the plan period, risks having only one strategy, and result in homes being delivered away from where they are needed most (Vistry Group, Bellway Strategic)
- As half of the indicative number of new homes would need to be provided on one site it places a heavy reliance on it coming forward at a high rate of delivery. This does not lend itself to a balanced mix of sites, or a choice of locations for future residents in terms of scale or location (Wates Developments Limited).

Other comments

- Agrees that exceptional circumstances do not exist at this stage for the review of Green Belt boundaries (Richborough Estates)
- The Council is wrong to dismiss the Green Belt and preclude it from the Spatial Approaches; Green Belt sites can deliver much needed housing in sustainable locations (Charterhouse Property Group & Charterhouse Strategic Land, The Howgego Trust)
- By prematurely ruling out Green Belt release, the Council are missing out on key opportunities to deliver sustainable development on the edge of Chelmsford urban area. The Local Plan Review process should provide evidence as to why suitable sites, as assessed and highlighted by the SHELAA, are not capable of release from the Green Belt (Martin Grant Homes)

- The absence of an alternative strategy to review the Green Belt – in association with a hybrid of the other spatial options being proposed - is not justified because there is no up to date evidence which demonstrates that “exceptional circumstances” requiring a review of the green boundaries will not exist during the plan extended period (Taylor Wimpey Strategic Land)
- The Council should provide evidence to support their rationale for how it has distributed growth between the Approaches (Martin Grant Homes)
- A robust spatial strategy would direct growth to all of these different types of locations to ensure that a range of development needs are met, and a robust and delivery housing trajectory is put in place for the Plan period (Strutt and Parker Farms Ltd)
- No objection to any of the five Approaches. Agree that a balanced and robust spatial delivery should steer varying proportions of growth to these locations to ensure the spatial strategy fully captures and delivers the development needs of specific groups throughout the plan period (Chris Buckenham)
- Strongly support additional development in the Key Service Settlements including Broomfield, which is a highly sustainable location given its major employment, health and education facilities and services, and sustainable links to Chelmsford (Obsidian Strategic Asset Management Ltd)
- Some appropriate provision for growth should be made in villages. Welcome the references to the NPPF instruction that a minimum of 10% of the housing requirement should be found via sites no larger than one hectare as this should assist in ensuring additional new housing provision in villages. The text in paragraph 6.30 should refer to "a minimum of 10% (Edward Gittins Associates)
- Should recognise the A12 as a potential location for further sustainable growth in Chelmsford, particularly in connection with A12 widening (Bolton, S&D)
- Housing delivery should be focused in areas with good existing or emerging transport connections and access infrastructure which will help support the delivery of sustainable development - in particular we encourage exploring growth along existing transport corridors and existing urban areas (L&Q)
- South Woodham Ferrers, in the top tier of the settlement hierarchy, benefits from a significant range of services and facilities. So, it should be accommodating a significant proportion of additional development. New settlements can provide housing for periods beyond the Local Plan, but if the Council were to focus on a new settlement, the growth of existing settlements would be stagnant. These major allocations should be supplemented with a combination of large, medium and smaller allocations in a balanced spatial strategy (Dandara Eastern)
- Strongly support the potential further allocation of land at the Chelmsford Garden Community as part of the review, where the additional housing capacity will bring increased certainty regarding the delivery and future funding of ongoing infrastructure requirements. However, the current allocations should be carried forward without change (Ptarmigan Chelmsford A Limited)
- Any new settlement, such as at Hammonds Farm, will take many years to reach any sort of critical mass whereby meaningful infrastructure contributions can be made, and potentially will be well beyond the Plan period (Ptarmigan Chelmsford A Limited)

- The Local Plan Review will be expected to address city-wide health infrastructure capacity in line with CCC's identified development needs of circa 8,000 new homes in the next plan period, regardless of the spatial approach selected (Grosvenor Property UK and Hammonds Estates LLP)
- Additional planning flexibility in the Writtle University Campus area will provide the ability for WUC to respond to the changing needs and opportunities in the locality. We propose taking WUC SPA out of the Green Belt, or to identify WUC as a major developed site where Green Belt policy does not apply (Writtle University College)
- An additional location for smaller rural communities that have access to public transport to nearby settlements and services can accommodate modest levels of housing should be considered as a spatial option (H R Philpot & Sons)
- Should carefully consider whether an additional 2,500 dwellings is capable of being delivered within the proposed Plan period within Chelmsford Garden Community; it should also be required to provide key infrastructure in the early phases to prevent unsustainable trips to services and facilities (Vistry Group)
- Disagree that all the Spatial Approaches will have broadly similar effects as we do not believe those that would result in the need for a greater level of travel are as sustainable as options that involve a concentration of development as close by to the city as possible (Vistry Group)
- Housing numbers for site allocations are termed as 'around' a housing number to allow for an appropriate degree of flexibility in provision. The proposed clarification of this in the updated Plan is supported as it provides the ability for site allocations to best meet the needs of the community as well as CCC's housing supply (Redrow Homes & Speakman Family)
- It is difficult to see how the proposed Spatial Approaches can be fully assessed against the economic IIA objectives when employment need, distribution and site allocations are still to be determined within the draft spatial strategy. Employment needs and economic growth should be considered as early as possible in the plan-making process to ensure it is aligned with the assessment of how other types of growth will be delivered as part of a well-balanced spatial strategy (Pigeon (Sandon) Ltd)
- Ahead of the publication of the updated employment needs study CCC should have close regard to the PPG in determining the specific locational requirements of specialist or new sectors including the logistics industry markets likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour (Pigeon (Sandon) Ltd).

Summary of Public Comments:

Approach A, B and mixed approaches

- A - Support with enhancements to services, to reduce sprawl with less condensed, greener, detached housing
- A and B - a combination of these would appear to be the most logical development areas and would be more cost effective than a proposal for developing a completely new settlement
- A and B - should be a higher strategic allocation with supporting policy to allow Danbury and other Key Service villages to take a greater portion of the housing and employment growth than envisaged in these approaches

- A and C – the separation and green gap between Boreham and Chelmsford is essential to keep Boreham a rural village; Boreham doctors and school are already at capacity
- A and C - rather than building houses on arable land more bias should be applied to development of brownfield sites within towns. We should preserve as much arable land as possible
- A and C - Boreham will suffer many adverse effects from the A12 widening, including from traffic from Hatfield Peverel. CCC expressed significant concerns about these impacts upon Boreham which seems at odds with proposals for extra houses and therefore traffic for Boreham; Waltham Road/Main Road junction is predicted to be above capacity with no improvement proposed; Plantation Road/Church Road/Hammonds Road is regularly used as a by-pass for the A12 which is congested on a daily basis
- A to D – object due to the impact on protected lanes, traffic problems, and the impact that building in Maldon has already had on services
- B - appears to be the better of the alternatives
- B - maximising development in the town centre is good but tends to limit housing provided to singles, couples or very small families. It still should continue on a compatible low rise level
- C to E - expansion of Danbury and other key service villages should be included. These villages have the capacity to accept more development due to the fringes of these settlements not being of high landscape value; development will support existing services and facilities of the villages and provide further community assets.

Approach D

- Support, especially at intersections like the new Chatham Green roundabout as it will provide better transport links for the area and create an obvious place for development
- Strongly support, as there is already infrastructure in place and an opportunity to improve services for existing residents
- Can augment existing settlements with good access to road and other infrastructure, and without the destructive effect on the countryside that would be caused by Approach E
- May just produce a modern form of ribbon development.

Approach E

- Petition of 2202 signatures stating a strong objection to Approach E; and proposing integration of Approach B and Approach D. Concerns include a lack of transport infrastructure, areas of flood plain, impact on GP and hospital facilities, a previous proposal was not supported by the 'Plan Evidence Base' including the 'Landscape Sensitivity and Capacity Assessment Preferred Option'
- The best proposal with the least disruption to residents, providing a new town (effectively) at Hammonds Farm. Little or no new infrastructure would be required except for the Hammonds Farm area
- Support due to better infrastructure in these locations
- Support, if development is done sensitively within the surroundings of the river and woodland this could be a beautiful location for wildlife and residents

- Support for new sustainable developments for people without changing the fabric of the local villages or asking the services in local villages to cope with more demands
- Limiting to around 1,800 dwellings, rather than the 4,000 proposed, will still be viable and provide all the independent services to support this population. E.g. Great Notley Garden Village of 1,800 dwellings provided shops, services , a country park , formal and informal play space, a dual carriageway and strategic landscaping
- Strong objection as a proposal to develop Hammonds Farm was rejected by CCC in 2017 because it was not supported by the 'Landscape Sensitivity and Capacity Assessment' – the landscape has not changed in the last 5 years
- The most significant negative environmental impact compared to all the other options. This option should be discarded on legal, environmental and commercial grounds
- Concern about availability of schools/nurseries, doctors and dentists, impact of additional residents' needs on Broomfield Hospital, services for people with special needs, policing, access to shops
- Concern about the impact on the A414. A12 especially junction 18 & 19, A130, congestion on minor roads in the area and rat-running, combined with additional traffic from developments in Maldon & Heybridge, unsustainable peak traffic pressure, traffic in Boreham, river bridge towards Boreham
- There is the yet unknown impact on Chelmsford roads and traffic from wider proposals such as new Thames crossing, potential power station at Bradwell
- There are no proposals to widen this section of the A12; and closing the Hatfield Peverel A12 junctions will cause more traffic in Boreham
- Would increase use of Chelmsford railway station; access to new railway station would be via the already congested A12
- The location is unsuitable for cycling routes to Danbury or Chelmsford and the alternative of buses would need massive long-term support if it is to become a trusted alternative; current cycle routes are on very busy roads and are unsuitable as a real alternative to car use (to Danbury and Chelmsford)
- Would put pressure in the Park and Ride service
- The intrusion on nature is much more than 4,000 houses; there is the need to build all the infrastructure for site from scratch, the desire to create the space for 4,000+ jobs, the need to enhance all the communication links to the site
- Concern that 4,000 houses will become 8,000 or even 12,000
- Concern about making Little Baddow and Danbury into suburbs of Chelmsford
- Concern about sewage treatment capacity
- Should not consider building on the flood plain or water meadow, particularly with the current climate issues; flood risk is already a problem with roads often flooding and having to be closed, this would make things worse; development should be on areas of lower flood risk first
- Currently the area offers access to the river, lakes, walking and cycling, and beauty spots which serve the broader community; it was a sanctuary during lockdown; it's a natural environment for the city's inhabitants; it provides an important resource for mental health and well-being; the Chelmer Valley deserves the same recognition as the Stour Valley
- Concern about the impact on the village character of Little Baddow and Danbury; there will be housing estates from Chelmsford to Heybridge with not a field in sight in a few years; the villages and their character will be gone

- The A12 forms a natural boundary which should contain development and prevent sprawl
- The views of Danbury Ridge would be adversely affected, as would views out from the War Memorial
- Heritage impact on the Chelmer Valley; impact on Great Graces and Graces Walk, Boreham Hall, St Clere's Hall, Danbury Palace
- Wildlife impacts including wildlife sites and ancient woodland, largely untouched in the past; wildlife will not survive; numerous wildlife species are recorded here including rare breeds; ECC gave an environmental award for wildlife survey work of this area, so it seems illogical to consider development
- Trying to restore this damage through biodiversity offset does not match the loss of precious habitat, and ignores the timing difference between immediate increase in carbon release through the development work and the many years absorption of carbon through the offset planting
- Loss of productive prime agricultural farmland which is highly productive
- Appears to be at odds with many of the Spatial Principles (particularly a, e, f, g, h, i)
- Garden communities are really new dormitories and are the worst for sustainability
- A number of Garden Community planning applications have been rejected recently as unsustainable
- There is a big difference between North-East Chelmsford which is not of spectacular beauty and Approach E which is on land which has beauty and attracts people from all over the county for views, walks, peace and tranquillity
- The assumption that garden communities will generate sufficient new jobs is misguided, jobs and services should precede residential development. Businesses may relocate but they will take their staff with them; new residents will already have jobs elsewhere
- The Garden Community approach is good as it may allow existing communities to keep some necessary local green space.

Other comments

- Support growth in urban areas, particularly South Woodham Ferrers. There is better access to main round networks, and would create greater spending power for new businesses and leisure facilities
- The major employers (Stansted, Broomfield Hospital, University) and new station and bypass are on the north side of the A12, so houses should be built north of Boreham to reduce traffic crossing and rat-running
- The Consultation does not seem to consider the impact on neighbouring areas or consider the impact of planning decisions in neighbouring districts. All the developments in Maldon have created a demand for services that Maldon cannot meet, e.g. medical facilities designed for Danbury and Little Baddow are now swamped with those who live in Maldon; increased traffic from Maldon on the A414 and the lanes
- It looks like most of the new development is in the East of the borough; I believe that developments could also be sustained in the West and possibly also Galleywood
- There is a need for small units for downsizing, and also to enable young local people to get a foothold in a village where they have grown up. Large

imposing mansions/houses should be prohibited in both large and small villages

- Support brownfield development; empty offices and retail units should be converted to new housing with priority for those near public open space, transport and cycle routes; empty commercial units further away could be refurbished for business use; and proper facilities for young people are needed
- Further allocation of housing to Danbury would not be sustainable; the Neighbourhood Plan is allocating sites for around 100 houses and has selected those with the least impact on the A414, rural/protected lanes, heritage and environmental assets, landscape; growth in Danbury and Little Baddow would also impact on traffic, local services, and recreational pressure on the SSSIs
- Concern about proposals at South Woodham Ferrers, due to traffic and pressure on services. Potential development in the Maldon district at Stow Maries and potential Bradwell power station will add to the pressure.
- Seems to be no clear reason why growth is desirable or necessary
- The maps give no detail on which fields and footpaths are threatened by development
- The Plan should concentrate on improving the city by promoting an environmentally friendly city
- Should refurbish empty homes for occupation, rather than build new ones
- New housing should be close as possible to the new railway station, the A12 and the centre of Chelmsford. People are more likely to walk and cycle if journey distances are shorter.

Our evidence says
The Strategic Housing Needs Assessment (SHNA) 2023 supports the housing requirement of 1,000 new homes per annum for the preferred Spatial Strategy.
Housing monitoring has shown that applying a supply buffer of around 20% will help provide flexibility in the supply of housing sites and ensure the housing requirement is met. This follows the approach used in the adopted Local Plan and the Core Strategy before that.
The Employment Land Review 2023 considers current economic trends and future requirements for new employment floorspace up to 2041. The Spatial Strategy proposes new employment sites totalling around 110,000sqm in addition to existing allocated employment sites in the adopted Local Plan.
The Retail Capacity Study Update 2023 finds that there is no need to allocate new sites for retailing and that there are no significant gaps in the provision of larger commercial leisure facilities in the area. In line with the study, no proposed new retail allocations are proposed in the Preferred Options Local Plan.
The Parish Audit 2024 is a technical assessment of key services, facilities, and bus provision available to residents within villages and parishes across the Council's area. It supports the Settlement Hierarchy in the preferred Spatial Strategy.
The Local Plan Viability Report 2023 provides a high-level viability of different typologies of development sites that could come forward through Local Plan allocations. The assessment supports the site allocations in the preferred Spatial Strategy.

Our evidence says
The Strategic Housing and Economic Land Availability Assessment (SHELAA) 2023 assesses land promoted for new housing and employment development. This is supplemented by the Urban Capacity Study 2024. The sites identified in the preferred Spatial Strategy are promoted for development and supported by the SHELAA 2023 and Urban Capacity Study 2024.
Drawing on the wider plan evidence base, national planning policy and guidance and the Issues and Options consultation responses to the five Spatial Approaches, three Spatial Strategies were developed for detailed technical testing in 2023. The Transport Impact Appraisal of Spatial Approaches 2023 assesses the relative impact of additional development traffic on the future capacity of links and junction on the road network of the three Strategies. The Landscape Sensitivity and Capacity Study 2024, considers the landscape sensitivity and resulting capacity for the development proposed in the three Strategies. The Water Cycle Study Scoping Report 2024 provides a high-level assessment of the three Strategies on water infrastructure. The technical outputs from each study identify positives and negatives associated with each Strategy. The outputs have been used alongside other plan evidence and national policy, to inform the employment and housing site allocations included within the preferred Spatial Strategy which has been subject to further technical testing – see below.
The Water Cycle Study Reports 2024 indicate no major concerns with respect to water supply to cater for proposed level of new growth. Chelmsford Water Recycling Centre (WRC) catchment, where most development is being proposed for the plan period up to 2041, has significant spare capacity and can accommodate the proposed development including the East Chelmsford Garden Community, Bicknacre, East Hanningfield and the employment allocations. They also identify constraints to development growth in Chatham Green due to constraints at Great Leighs WRC. The studies support the preferred Spatial Strategy.
The Preferred Options IIA 2024 considers that the preferred Spatial Strategy, which is a hybrid of Approaches A to E, will focus new housing and employment growth to the most sustainable locations when considered against national planning policy, analysis of responses to the I&O, environmental constraints, discussions with key stakeholders, availability/viability of land, the settlement hierarchy, and draft Vision/Spatial Principles.
The Infrastructure Delivery Plan (IDP) 2023 supports the levels of growth and locations of growth over the plan period and considers that the required new infrastructure improvement and investment is feasible and deliverable. Overall, the IDP supports the preferred Spatial Strategy.
The Housing Sites Schedule April 2023 details allocated sites for housing and non-allocated sites which have come forward in the planning process. It supports the proposed new Local Plan housing allocations in the preferred Spatial Strategy.

The Preferred Options Local Plan
The preferred Spatial Strategy has been developed using national policy, relevant policies and strategies, engagement with key stakeholders, feedback from the Issues and Options consultation, and the plan evidence base including testing of options through the IIA, traffic modelling and landscape capacity (as described above).

The Preferred Options Local Plan
The preferred Spatial Strategy reflects the proposed updated Vision and Strategic Priorities of the plan including Strategic Priority 1 Addressing the Climate and Ecological Emergency
The preferred Spatial Strategy is an evolution of the five spatial approaches tested at Issues and Options stage, which overall received a mixed reception in the comments and three hybrid Spatial Strategies tested in 2023. It continues to focus new housing and employment growth to the most sustainable locations in three Growth Areas informed by the settlement hierarchy, site availability, environmental constraints, and factors of delivery. Growth will be accommodated on unbuilt allocated sites rolled forward from the adopted Local Plan and new proposed site allocations.
The amount of new development in the preferred Spatial Strategy is informed by updated evidence base and data, including the Strategic Housing Needs Assessment 2023, Employment Land Review 2023 and provisional findings of the Gypsy and Traveller and Travelling Showpeople Accommodation Assessment 2023 to 2041.
The Issues and Options consultation document suggested a need for around 8,000 additional new homes, over and above those allocated in the adopted plan. More recent monitoring data in the Housing Sites Schedule (April 2023) indicates that the residual requirement is around 4,860 dwellings, primarily due to an increase in sites with planning permission and increased capacities on adopted Local Plan allocations to 2036. This lower figure is used in the preferred Spatial Strategy.
Overall, the preferred Spatial Strategy meets development needs for new housing, employment and Travelling Showpeople in full, protects the Green Belt, and allocates new development in sustainable locations.
Unbuilt site allocations in the adopted Spatial Strategy have been rolled forward into the preferred Spatial Strategy as they continue to represent sustainable and sound development allocations.
It is not considered proportionate or necessary to undertake a carbon impact assessment in addition to the IIA (and there is also no requirement to undertake this). The Local Plan and the IIA are considered to be in accordance with guidance on carbon impact assessment.
Alternative Spatial Strategies and site allocations have been considered, tested in the evidence base, and rejected as they perform less well than the preferred Spatial Strategy and site allocations – see below.
Additional growth in Chelmsford Urban Area (Spatial Approaches A-E) was supported as a sustainable approach in the Issues and Options consultation responses. The preferred Spatial Strategy makes the best use of previously developed land in Chelmsford Urban Area by proposing new sites for housing and employment in line with the Urban Capacity Study 2024. However, it is not possible to accommodate all future growth needs on brownfield sites, so further greenfield sites are identified in the preferred Local Plan.
Spatial Approach D included housing growth in settlements with good proximity to transport corridors). This received some support in the Issues and Options consultation responses. A new Garden Community in East Chelmsford and strategic employment site at Junction 18 of the A12 form part of the preferred Spatial Strategy. These sites will have good access to the strategic road network and provide active and sustainable transport connections into Chelmsford Urban

The Preferred Options Local Plan
Area and City Centre. Chatham Green has been discounted given its relative isolated location from the strategic highway network and new railway station. Howe Green has been discounted as a new primary school would need to be provided but no site of a suitable size is promoted. Rettendon Common has been discounted due to its distance from the wider transport network and existing services and facilities.
Spatial Approaches A and C included a large new settlement at Hammonds Farm. This was generally opposed in the Issues and Options consultation responses, although limited support was shown for a sensitive approach. A new Garden Community in East Chelmsford forms part of the preferred Spatial Strategy. The site allocation policy (SGS16a) will require the development to be a high-quality comprehensively planned landscape-led new sustainable Garden Community based on TCPA Garden City Principles that is supported by a wide range of services, facilities, and infrastructure including schools, employment, neighbourhood centres and a new Country Park. The site policy also requires development impacts are suitably mitigated. The site performs well in the IIA when considered against the evidence base, constraints and opportunities, and is supported by the plan evidence base including the 2024 Water Cycle Study Reports. Specific concerns identified in the consultation responses are addressed in the site policy requirements including landscape, traffic and heritage impacts.
Spatial Approaches A and C considered housing growth in Key Service Settlements and Service Settlements and received a mixed reaction in the consultation responses. The preferred Spatial Strategy proposes limited housing development in Bicknacre, East Hanningfield and Ford End. These villages have existing primary schools with capacity and community facilities making them suitable for limited new development. Development will also provide opportunities to contribute towards and enhance the existing facilities and services of the villages and help towards the national planning policy requirement to accommodate at least 10% of the housing requirement on sites no larger than one hectare. Growth in other Key Service Settlements and Service Settlements above that in the adopted Local Plan has been rejected as they are too constrained and unsuitable for further development growth. Reasons include a lack of known capacity in respect of highways and/or primary school provision, Green Wedge constraints and a lack of available sites promoted.
Spatial Approaches A-D included housing growth as extensions to the edge of Chelmsford and North of South Woodham Ferrers. This received a mixed reaction in the consultation responses. This approach has been rejected as the evidence base shows that these locations perform less well than the preferred Spatial Strategy and proposed site allocations. Reasons include a lack of known capacity in respect of highways and/or primary school provision.
Further expansion of Chelmsford Garden Community (Spatial Approaches A-E) has been discounted as it is not deliverable within the plan period given permitted mineral extraction and land remediation works.
The preferred Spatial Strategy includes a mix of different types and sizes of site allocations across a variety of locations that could come forward throughout the plan period.
The preferred options document details the supporting infrastructure which would be required to be delivered alongside the proposed new employment and housing allocation. This includes provision of appropriate school facilities and highways

The Preferred Options Local Plan
infrastructure. The Council will continue to engage with infrastructure providers to ensure appropriate infrastructure can and will be provided and planned for.
Policies in the plan including the site specific and development management policies contain requirements to ensure new development will be acceptable in highways and landscape terms.
In line with national planning policy, there are no 'exceptional circumstances' demonstrated to release Green Belt within the City Council Area. The preferred Spatial Strategy indicates that additional development requirements can be sustainably delivered at locations outside the Green Belt. Therefore, a review of the Green Belt is not appropriate or necessary.
Confirmation from Duty to Cooperate Bodies that they will continue to engage with the Council during the plan-making process is welcomed.
The Preferred Options Local Plan includes updated information on the delivery of the Chelmsford North East Bypass and new railway station.
Further information on the approach taken in distilling the options available including testing three Spatial Strategy options from the Issues and Options and the reasoning for the preferred Spatial Strategy, is set out in the Preferred Options Spatial Strategy and Strategic Sites Topic Paper.
The Green Wedge boundaries are appropriately defined around the main river valleys as set out in the Green Wedge evidence base reports.

Key Statistics:

Question	Yes	No	Comments	Total number of responses
63. Are there any Spatial Approaches that the Council has missed?	N/A	N/A	44	44

Please not that many respondents used Question 62 to comment on the Spatial Approaches presented in the consultation document and any the Council may have missed. As such, the responses below should be read alongside those in Question 62.

Summary of Specific and DTC consultees comments:

- More development to the west of Chelmsford including challenging the Green Belt to the west/south-west of Chelmsford; protecting the green belt is pushing development to its borders (South Woodham Ferrers Town Council)
- A combination of approaches B, D and E - Hammonds Farm could be smaller, it uses rail infrastructure, A12 and A130 corridors, minimises car use, meets the new Vision and meets the climate and ecology emergency (North West Parishes Group, Broomfield Parish Council) and it complements the existing commuting patterns (Broomfield Parish Council)
- A combination of D and E would provide flexibility given that delivery at Hammonds Farm would extend beyond 2041 (Chignal Parish Council).

Summary of General Consultees Comments:

None.

Summary of Developer/Landowner/Agent Comments:

- Carry out a Green Belt review (Rosehart Properties Ltd, Pembridge Land Group, Taylor Wimpey Strategic Land, Barratt David Wilson)
- There is insufficient evidence to demonstrate that some alterations to Green Belt boundaries in the most sustainable locations, immediately adjacent to the existing defined Chelmsford Urban Area, should not be considered (Rosehart Properties Ltd, Pembridge Land Group)
- The historic and existing spatial strategies that did not review the Green Belt has led to a distorted settlement pattern for Chelmsford. This cannot continue with substantial growth to the north, north east and west without creating harmful impacts on other important sustainability considerations including transport and the environment (Pembridge Land Group, Rosehart Properties)
- Should consider growth in the Green Wedge along the A130, as part of a review of all spatial options (Hill Farm (Chelmsford) Ltd)
- CCC consider that the additional development requirements identified through the Local Plan review can be sustainably delivered outside the Green Belt, and that these areas also have significant infrastructure improvements planned as part of the adopted Local Plan. Therefore, CCC do not believe that there are exceptional circumstances which would warrant a departure from national planning policy. This is questioned as CCC has not published their updated Employment Needs Study hence the full employment needs are not fully understood, and the challenges associated with such delivering such growth (Gray & Sons)
- The Strategy fails to consider a spatial strategy which reviews the green belt boundaries where it would meet an identified community and housing need. The alternative options are not justified because the identified brownfield sites are assumed to all be available and deliverable or developable during the plan period, the proposed growth sites outside the Green Belt are assumed to be viable and the necessary infrastructure are assumed to be funded and completed during the plan period. In addition, the evidence base on the city's housing need and land supply has not been updated (Taylor Wimpey Strategic Land)
- There is no reference to the location of non-strategic employment areas. As part of the spatial approach, we expect to see consideration of and distribution of employment growth to rural areas beyond the Chelmsford Urban Area to help sustain and enhance the vitality of rural communities in line with para 84 of the NPPF (The Bucknell Family, Hill Farm (Chelmsford) Ltd)
- Do not support the approach. There is substantial development potential in the city centre that is not being recognised (Dominvs Group)
- Approach D but with Chatham Green as the only transport corridor proposal as it scores highly in sustainability terms (Mrs and Mrs Andrew Parker)

- Less additional growth at allocated sites and more across Service Settlements to enhance their sustainability, including Rettendon Place rather than Rettendon Common (Croudace Homes)
- Revisit the Settlement Hierarchy so Broomfield can be considered an urban area, and then allocated development in its own right as one of the most sustainable settlements (Obsidian Strategic Asset Management)
- The Council should recognise the A12 as a potential location for further sustainable growth in Chelmsford, as a transport corridor (Bolton, S&D)
- The Council could adopt a more diverse strategy, with site allocations in all sustainable settlements across the plan area to support existing services and facilities and maintain viability of communities (Dandara Eastern, Hill Residential Ltd)
- Should include a category for 'Chelmsford Urban Area and adjoining land' to recognise that there are highly sustainable and suitable greenfield sites within or immediately adjacent to the Chelmsford Urban Area (Martin Grant Homes, Mr J Bolingbroke)
- There should be a balance of growth across the settlement hierarchy with a focus on growth in areas well connected to new transport infrastructure. Boreham should be considered more favourably than the other Key Service Settlements of Danbury and Great Leighs due to its strategic location and access to the new rail station, employment space and Chelmsford North East Bypass. Boreham has seen limited growth or housing allocations compared with other settlements (Wates Developments Limited)
- Consider a site with cross-boundary potential to deliver a sustainable pattern of growth, of satellite villages along the A131 northbound all the way up to Braintree from Chatham Green, around Great Leighs, terminating at Great Notley before reaching Braintree Town Centre. This would maximise the potential for sustainable distribution of growth throughout the plan period (Mr Alexander Micklem).

Summary of Public Comments:

- To be more sustainable, that means increasing the concentration of housing, not spreading it ever more widely; focus on increasing the density in Chelmsford without spreading the urban footprint into the countryside
- A130 corridor is flat, potential for mitigation from road noise, not of high visual quality, so would be worth considering
- Development could be sustained in Galleywood
- All communities of 50+ residences should be provided with an allocation for 'natural' growth and down-sizing elderly who wish to remain in their community
- Due to constraints elsewhere, logically the developments should be West on the A414 (extension of the Writtle area) or East on the A414 in the Danbury or Little Baddow area. There are vast tracts of land in this area which is ripe for development. Suggest a top down approach where the parish councils are asked where the best locations would be.

Our evidence says
Following the Issues and Options consultation three Spatial Strategies were developed for detailed technical testing in 2023. The Preferred Options Spatial Strategy has evolved from the outputs of the technical testing on the three Spatial Strategy options alongside other evidence, and national policy and has been subject to further technical testing.
The Preferred Options Local Plan is supported by a number of evidence base studies such as the Preferred Options Integrated Impact Assessment (IIA), Employment Land Review, Water Cycle Studies, Transport Assessments, Strategic Flood Risk Assessments and Landscape Sensitivity and Capacity Study 2024.

The Preferred Options Local Plan
The consultation responses, call for site submissions, national planning policy, evidence base including the final development requirements inform the preferred Spatial Strategy.
The Preferred Options Spatial Strategy and Strategic Sites Topic Paper outlines the approach taken in distilling the options available including testing three Spatial Strategy options following the Issues and Options and the reasoning for the Spatial Strategy shown in Preferred Options Local Plan.
The Preferred Options Local Plan does not include sites in the Green Belt. National planning policy makes clear that Green Belt boundaries should only be altered in exceptional circumstances. The additional development requirements needed through the review of the adopted Local Plan can be sustainably delivered at locations outside the Green Belt. These locations also have significant infrastructure improvements planned as part of the adopted Local Plan. There are no exceptional circumstances which would warrant a departure from national planning policy.
The preferred Spatial Strategy proposes new employment sites totalling around 110,000sqm in addition to existing allocated employment sites in the adopted Local Plan.
Additional growth in Chelmsford Urban Area was supported as a sustainable approach in the Issues and Options consultation responses. Several additional housing and employment site allocations are included within the Preferred Spatial Strategy to meet additional needs to 2041.

See also tables under Q62.

Part 7 – Development Standards

This section of the consultation document sets out standards that normally apply to all new residential development which seek to ensure that new development will meet the needs of their occupiers, minimise the impact of new developments on adjacent occupiers and encourage recycling.

Key statistics:

Question	Yes	No	Comments	Total number of responses
64. Do you support the approach being taken? If you disagree, please explain why?	20	3	15	38
65. Do you have any views on the Council's current development standards and the decisions they lead to?	N/A	N/A	14	14
66. Are any development standards missing, should anything be changed or do some standards require further clarification to aid interpretation? Where possible, please support your answer with reference to any evidence.	N/A	N/A	17	17

Summary of Specific and DTC consultees comments:

- Welcome the additional design standards proposed and the attempt to reduce the carbon footprint of new housing. Building standards need to go further if we are to meet targets for net zero carbon by 2050. Request a greater commitment towards net biodiversity gain. In order to succeed, this will require specific targets with regular monitoring and reporting (Boreham Parish Council)
- Continue the following as part of the review of the Local Plan - use of community spaces as a hub for our Prevention teams to deliver Fire Safety and Education visits; adherence to the requirements of the Fire Safety Order and relevant building regulations, especially in relation to smoke alarms/sprinkler systems; implementation of vision zero principles where there are introductions of or changes to the road network; appropriate planning and mitigations to reduce risks around outdoor water sources; suitable principles in design to avoid deliberate fire setting (Essex County Fire and Rescue Service)
- In relation to access during and post construction the following should be considered - road widths to be accessible whilst not impeding emergency service vehicle response through safe access routes for fire appliances including room to manoeuvre (such as turning circles); implementation of a transport strategy to minimise the impact of construction and prevent an increase in the number of road traffic collisions; no negative impact on the

Service's ability to respond to an incident in the local area arising from the development; a risk reduction strategy to cover the construction and completion phases of the project and the implementation of a land management strategy (Essex County Fire and Rescue Service)

- Support the proposed approach (Great Waltham Parish Council, Essex County Council)
- Support the reference to the EDG in the standards (Essex County Council)
- Recommend that the proposed development standards are more closely aligned with the EDG and refer to a number of ECC documents relating to net zero development, solar farms, 5G and drainage (Essex County Council)
- The 'Essex Healthy Places Advice - Notes for planners, developers and designers' should be incorporated into the new Health Impact Assessment policy (Essex County Council)
- Current policy is inconsistent with the other policies in the document (Writtle Parish Council)
- Development standards could be more ambitious with integrated water management on larger sites. Improvements can be made particularly around water efficiency and reuse (Anglian Water Services Ltd)
- The Council's area is within an area designated by the Environment Agency as in serious water stress. As such, plan policies should require new homes to meet the optional tighter standard of 110 litres per person per day (Essex County Council).

Summary of General Consultees Comments:

- Support proposed approach (Newland Spring Residents Association).
- Current policy does not offer flexibility, as not all development will be able to meet the standards (CHP)
- Missed standards relating to net zero (CHP)
- The review of the Council's evidence base for community sport should be used to inform a review of the Council's current approach to securing provision for sports provision in new development (Sport England)
- The approach to provision should now be informed by needs assessments e.g. Playing Pitch Strategies and not generic quantity and access standards (Sports England).

Summary of Developer/Landowner/Agent Comments:

- Support the proposed approach (Bellway Strategic, Chelmsford Garden Community Consortium)
- Support the review of the development standards (Taylor Wimpey, Hill Residential Ltd, Dandara, Dandara Eastern)
- Should be viability tested (Vistry Group)
- Should avoid being overly prescriptive and could be contained within an SPD as they are a non-strategic policy (Bellway Strategic)
- Policy should be based upon existing provision and standards should not be proposed that are not yet commercially viable or proven to be technically feasible - particularly in relation to recycling and waste collection on strategic sites) (Chelmsford Garden Community Consortium)

- Missing changes to the private garden sizes. Lowering the amenity provision for three bed units in close proximity to the city centre would result in the better use of brownfield land, providing more new homes, of a size which is of greater demand and more affordable (Broadfield Homes Ltd).

Summary of Public Comments:

- Support the proposed development standards
- Private back gardens/personal open space is needed as more people are using them as play spaces or for growing food
- Concerned that gardens on new houses are now much smaller
- There is less opportunity to extend new dwellings
- Need to increase capacity for increase in refuse/recycling provision
- Should be more radical to respond to the climate emergency with solar panels, EV charging points and facilities to recycle grey water
- Houses should be carbon neutral
- Council should have an all-in-one recycling bin
- Ensure green buildings with well insulated homes
- Ensure mandatory EV charging points
- There is a missing requirement for solar panels and heat pumps along with other measures to increase self-sufficiency.

Our evidence says
The Essex Design Guide emphasises the importance of the design of private amenity spaces.
An updated Open Space, Sports and Recreational Facilities Study and Sports Facilities Strategy has been commissioned. It will provide up-to-date and robust evidence base on community sports facilities required to support the updated policies and will inform the final draft plan (the Pre-Submission Local Plan).
A key action in the Council's Our Chelmsford Our Plan and the Council's Climate and Ecological Emergency Declaration Action Plan is to significantly increase the amount of woodland and tree cover in Chelmsford.
Essex Net Zero Policy – Summary of Policy, Evidence and Validation Requirements sets out the requirements for Net Zero Carbon dwellings in Local Plans across Essex.

The Preferred Options Local Plan
Changes have been made to the privacy, private amenity space and natural light sections for clarity, to aid interpretation, to align with Essex Design Guide and to make reference to good practice guidance. Information on maisonettes has also been included.
Appendix B is focused on standards, so more detailed design advice for private amenity spaces will be more appropriately included in an updated Making Places SPD.
The open space section has been simplified to make it more effective with references to the Council's Open Space Advice Note, the Planning Obligations SPD and the pending updated Open Space, Sports and Recreational Facilities Study and Sports Facilities Strategy.

The Preferred Options Local Plan
A new tree planting section has been added to reflect the Council's corporate plan 'Our Chelmsford, Our Plan', the Council's Climate and Ecological Emergency Action Plan and to align with updated Policy DM17 (Trees, Woodland and Landscape Features).
The Waste and Recycling section is amended with updated key design standards and collection vehicle dimensions. A link to the Council's Recycling and Waste Collection Policy is also added. References to documents no longer in use have been removed.
The Development Standards do not deal with energy and water efficiency standards which falls under Policy DM25 (Sustainable Buildings). This policy includes updated requirements for water efficiency and rainwater harvesting, and access to electric vehicle charging infrastructure. Content relating to zero carbon development has been merged into Policy DM31 (Net Zero Carbon Development (In operation). This is a new policy developed with Essex Planning Officers Association and Essex County Council, for new buildings to be designed and built to be net zero carbon in operation.
Issues such as access by fire & rescue services and use of community spaces as a hub for prevention teams to deliver Fire Safety and Education visit, are details to be considered at site masterplanning and planning application stages.

Appendix 1: Organisations consulted and copies of key consultation materials

APPENDIX 1

List of organisations consulted

Consultation Statement

Exhibition Panels

Pop-Up Stand

Pop-Up Stand on Site

Local Plan Video

Local Plan Virtual Exhibition

Essex Chronicle Adverts

City Life Articles

South Woodham Focus Article

Local Plan Poster

Examples of Social Media Posts

Local Plan Newsletter

LIST OF ORGANISATIONS CONSULTED

The Council notified nearly 2,100 contacts registered on its Consultation Portal.
This included the specific and general contacts listed below, and members of the public who are not listed.

1st Chelmsford Scouts
A Dunn & Son
Abbess, Beauchamp & Berners Roding Parish Council
Abellio Greater Anglia
Accord Energy Limited
Active Workspace Ltd
Age UK Essex
Aggregate Industries UK Ltd
Alan Wipperman & Co
Aldi Stores
Alun Design Consultancy
Anchor Housing
Andrew Martin - Planning Limited
Angel Stores
Anglia Ruskin University
Anglian Water Services Ltd
Aquila Developments
Archerfield Homes
Arriva The Shires and Essex
Ashton KCJ
ASP
Atkins Telecom
Avison Young
Aviva
b3 Architects llp
Baddow Hall Junior School
Bakers Lane Action Group
Barking & Dagenham CCG
Barking & Dagenham London Borough Council
Barnes Farm Infant School
Barnes Farm Junior School
Barnston Parish Council
Barratt Eastern Counties
Barton Willmore
Basildon & Brentwood CCG
Basildon Borough Council
Baya Homes
BDB Design
BDP
Beehive Lane County Primary School
Bennetts BMW Specialists
Berkeley Strategic
Billericay Town Council
Bishops Primary School
Black Notley Parish Council
Blackmore, Hook End & Wyatts Green Parish Council
Bloor Homes
BNP Paribas Real Estate UK
Boreham Conservation Society
Boreham Parish Council
Boreham Primary School
Bowler Energy LLP
Braintree District Council
Brentwood and Chelmsford Green Party
Brentwood Borough Council
Bressole Limited
British Toilet Association
Broomfield Neighbourhood Plan Steering Group
Broomfield Parish Council
Broomfield Primary School
BT National Notice Handling Centre
BT Openreach, Southend ATE
Building Research Establishment
CAAG
Campaign for Real Ale Limited
Campaign for the Protection of Rural Essex
CAODS (Chelmsford Amateur Operatic & Dramatic Society)
Capita Property and Infrastructure
Capital Property & Construction Consultants Ltd
Carter Jonas
Castle Point & Rochford CCG
Castle Point Council
CBRE
Cemex UK Properties Ltd
Centrica Barry/ Generation/ KL/ PB/ RPS LTD
CERA (Chignal Estate Residents Association)
Chancellor Park Primary School
Charisma Spatial Planning
Chartplan (2004) Limited
Chelmer & Blackwater Navigation Co Ltd
Chelmer Canal Trust
Chelmer Cycling Club
Chelmer Housing Partnership
Chelmer Residents Forum
Chelmer Valley High School
Chelmsford and District Model Railway Club
Chelmsford Biodiversity Forum
Chelmsford Business Board
Chelmsford Business Forum
Chelmsford City Centre Retailers Group
Chelmsford City Football Club
Chelmsford Civic Society
Chelmsford College
Chelmsford Community Transport Limited
Chelmsford Commuters & Rail Travellers
Chelmsford County High Schools for Girls
Chelmsford CVS
Chelmsford Cycle Action Group
Chelmsford Hindu Society
Chelmsford Labour Party
Chelmsford Liberal Democrats
Chelmsford Liberal Party
Chelmsford Mencap
Chelmsford NAG
Chelmsford Rivers And Canal Link Group
Chelmsford Rugby Football Club
Chelmsford Safety Supplies
Chelmsford Social Club Ltd
Chelmsford Star Co-operative Society Ltd
Chelmsford Taxi Association Limited
Chelmsford Theatre Workshop
Chelmsford Young Generation Amateur Musical Society
Cheltenham Borough Council
CHESS
Chignal Parish Council
CHP
CHP Customer Review Panel
Chris Marten Architectural Services
Chris Tivey Associates
Christian Growth Centre Chelmsford
Church of Our Lady Immaculate
Churchill Retirement Living
Civil Aviation Authority
Claremont Planning

Clarke & Simpson
Coal Authority
CODE Development Planners
Code for Consideration Constructors
Colchester City Council
Cold Norton Parish Council
Collingwood Primary School
Colt Technology Services
Columbus School & College
Commercial Estates Group
Company of Proprietors of the Chelmer & Blackwater Navigation Ltd
Confederation of Passenger Transport UK (Hedingham/Chambers)
Cool Heat Services
Corona Energy Retail 4 Ltd
Countrywide Farmers Plc
CPRE Essex
Craintern Ltd
Crest Nicholson
Crouch Vale Brewery Ltd
Crown Energy Ltd
CSJ Planning Consultants Ltd
D2 Planning Limited
Danbury Mission
Danbury Neighbourhood Plan Steering Group
Danbury Park Community Primary School
Danbury Parish Council
Danbury Society
Dandara
Data Energy Management Services Ltd
Defence Infrastructure Organisation (DIO)
Department for Education
Department for Levelling Up, Housing and Communities
Department for Transport (DfT)
Department of Trade and Industry
Derbyshire Gypsy Liaison Group
Design Council
detoxpeople ltd
Development Land & Planning Consultants Ltd
DevPlan UK
DHA Planning
Diageo Pension Trust Fund
Diocese of Chelmsford
Dominic Lawson Bespoke Planning Ltd
Dominvs Group
Downham CE (VC) Primary School
DTI
DWD Property & Planning
E & M Design
E.ON UK Plc
E2V Technologies
East Anglia London Properties Ltd
East Hanningfield Parish Council
East Hanningfield Parish Plan Committee
East Herts District Council
East of England Ambulance Service NHS Trust
East Thames Housing
Eastlight Homes
Ecotricity
EDF Energy
Education & Skills Funding Agency
Edward Gittins & Associates
Edward Parsley Associates Ltd
EE
Elim Christian Centre
Elm Green Preparatory School
Elmwood Primary School
Energy Environment and Sustainability Group
Enfield CCG
Enfield London Borough Council English Rural Housing Association
ENI UK Ltd
Enplan
Environment Agency
Epping Forest District Council
ERGOTECHNICS
esperance energies
Essex & Suffolk Water
Essex Ambulance Service
Essex ARG
Essex Association of Local Councils
Essex Badger Protection Group
Essex Biodiversity Project
Essex Bridleways Association
Essex Chamber of Commerce
Essex Chronicle
Essex County Council
Essex County Fire & Rescue Service
Essex Herts Air Ambulance Trust Essex Local Nature Partnership
Essex Police
Essex Police, Fire and Crime Commissioner
Essex Respite and Care Association
Essex Squash & Racketball Association
Essex Waterways Ltd
Essex Wildlife Trust
Estuary Design Ltd
Estuary Housing Association
Exolum Pipeline System Ltd
Farleigh Hospice
Felsted Parish Council
Fenn Wright
Fergusons
First Essex Buses Ltd
Fisher German LLP
Flagship Housing Group Ltd
Flaternity Residents Association
Flitch Green Parish Council
Football Association
Ford End Church of England Primary School
Ford End Village Design Statement Committee
Forestry Commission England
Frazer Halls Associates
Friends, Families and Travellers and Traveller Law Reform Project
G.T.C/Utility Grid Installations
Galleywood Infant School
Galleywood Parish Council
GB Partnerships
Good Easter Parish Council
Great Baddow High School
GL Hearn Limited
Gladman Developments Ltd
Graham Anthony Associates
Great Baddow High School
Great Baddow Parish Council
Great Baddow St Mary
Great Notley Parish Council
Great Waltham C of E (VC) Primary School
Great & Little Leighs Parish Council
Great Waltham Parish Council
Greater London Authority
Green Planning Studio Ltd
Greenfields Community Housing Ltd
Greenwood Estates Ltd
Grosvenor Developments Ltd
GVA Grimley
H M Prison Service
Hamilton Bentley & Partners

Harlequin Ltd
Harlow District Council
Hastoe Housing Association
Hatfield Peverel Parish Council
Havering CCG
Havering London Borough
Health and Safety Executive
Heart of Essex Local Enterprise Partnership
Heathcote School
Heatons
Help The Aged
Helping Hands Essex
Heritage Writtle
Hertfordshire County Council
High Easter Parish Council
High Ongar Parish Council
Highwood Parish Council
Highwood Primary School
Hill
Historic England
HLR Consulting Ltd
Home Builders Federation
Homes England
House Of Commons
Howe Green Community Association
Hullbridge Parish Council
Hunter Page Planning
Hylands School
Iceni Projects
Ideas Hub
Indigo Planning Ltd
Ingatestone and Fryerning Parish Council
Ingatestone Village Design Statement
Intergen
J. Aron & Company
James Development Ltd
JB Planning Associates Ltd
JCN Design Ltd
John H Bayliss & Co
Keeble Brothers
Keeran Designs Ltd
Kemsley LLP
King Edward Grammar School
Kings Hardware Ltd
Kings Road Primary School
Kings Road/North Avenue Community Action Group
Lambert Smith Hampton
Landscape Planning Group Ltd
Langford and Ulting Parish Council
Lanpro
Larkrise Primary School
Larmar Engineering
Latimer Homes
Lawford Mead Primary & Nursery School
Lawns Action Group
Little Baddow Conservation Society
Little Baddow Parish Council
Little Dunmow Parish Council
Little Waltham C E V A Primary School
Little Waltham Parish Council
Lodge Coaches
London Borough of Barking and Dagenham
London Borough of Enfield
London Borough of Redbridge
London Borough of Waltham Forest
London Gypsies and Travellers Unit
LSL Partners
Maldon District Council
Maltese Road Primary School
Mansfield Monk Limited
Marconi Plaza Residents Association
Margaretting CE (VC) Primary School
Marine Management Organisation (MMO)
Mark Jackson Planning
Margaret Roding Parish Council
Margaretting Parish Council
Mashbury Parish Council
Maypole Press & Publishing Co
McDonald's Restaurants
Meadgate Primary School
Meadows Shopping Centre
Melville Dunbar Associates
Michael Benham Acquisition/Disposal of Land & Property
Mid and South Essex Health and Care Partnership
Mid Essex CCG
Mid Essex Gravel Pits (Chelmsford) Ltd
Mid Essex Hospital Services NHS Trust
Mid-Essex Business Group
Mildmay Infant and Nursery School
Moat Housing Group
Mobile Broadband Network Limited
Mono Consultants Ltd
Montagu Evans
Moody Homes Ltd
Moulsham High School
Moulsham Infant School
Moulsham Junior School
Mountnessing Parish Council
N Clark Welding & Fabrication
Nathaniel Lichfield and Partners
National Grid
National Highways
Natural England
Neos Networks
Network Rail
New Hall School
Newlands Spring Primary School
Newlands Spring Residents Association
NFGLG
NGB Essex Angling
NGB Essex Athletics
NGB Essex Basketball
NGB Essex Boccia
NGB Essex Bowls
NGB Essex Cricket
NGB Essex Cycling
NGB Essex Dodgeball
NGB Essex Fencing
NGB Essex Football
NGB Essex Golf
NGB Essex Gymnastics
NGB Essex Handball
NGB Essex Hockey
NGB Essex Lacrosse
NGB Essex Movement and Dance
NGB Essex Orienteering
NGB Essex Petanque
NGB Essex Rowing
NGB Essex Rugby League
NGB Essex Rugby Union
NGB Essex Sailing
NGB Essex Squash
NGB Essex Triathlon
NGB Essex Volleyball
NHS England, East
NHS Mid and South Essex Sustainability and Transformation Partnership
NHS South East and South West Essex
NIBS Buses
Nigel Chapman Associates
North Essex Partnership NHS Foundation Trust

North Fambridge Parish Council
North West Parishes Group
Northern Trust
Oaklands Infants School
Office of Rail Regulation
Opus Energy Ltd
Our Lady Immaculate R C Primary School
Parkway and Town Centre Neighbourhood Action Panel
Parkwood Academy
Paul Dickinson & Associates
Peacock & Smith
Pegasus Group
Pegasus Planning Group Ltd
Perryfields County Infants School
Perryfields Junior School
Persimmon Homes Essex
Phase 2 Planning & Development Ltd
PKC Retail Ltd
PlanIt Planning and Development Ltd
Planning Potential
Planware Ltd
Plater Claiborne Architecture & Design
Pleshey Parish Council
Pomery Planning Consultants
Premier Homes
Prestige Pianos
Princes Rd Allotment Association
Priory Primary School
PS Planning & Design
Ptarmigan Land Ltd
Purleigh Parish Council
Ramblers Essex Area
Ramsden Bellhouse Parish Council
Ramsden Crays Parish Council
Rapleys
Rawreth Parish Council
Rayleigh Town Council
Raymond Stemp Associates
Rayne Parish Council
RCCE
Redbridge CCG
Redbridge London Borough Council
Regal Busways
Rentplus (Agents Tetlow King Planning)
Reprohouse Limited
Resting Places Limited
Retail Focus
Rettendon Common Residents Association
Rettendon Parish Council
Rettendon Primary School
River Crouch Conservation Trust
Road Haulage Association
Robert Brett & Sons Ltd
Robinson and Hall
Rochford District Council
Roxwell CofE (VC) Primary School
Roxwell Parish Council
Royal Mail Group
Royal Society For Protection of Birds
RPS Group
RPS Planning & Development Ltd
RSPCA
Rugby Football Union
Rugbytots Central Essex
Runwell Parish Council
Rural Solutions Ltd
Ruston Planning Limited
Sandon School
Sandon Parish Council
Savills (UK) Limited
Scott Brownrigg
Scottish & Southern Energy Pipelines
Sellwood Planning
Shirley Smith & Co
Shotgate Parish Council
Sky Telecommunication Services Ltd
Smart Planning
Smiths Environmental Products Ltd
South East LEP
South Molton Real Estate Ltd
South Woodham Action Group
South Woodham Ferrers Health & Social Care Group
South Woodham Ferrers Town Council
Southend City Council
Southend CCG
Southern Electric
South Hanningfield Parish Council
SP PowerSystems
SPD Studio
Sphere 25
Sport England
Springboard Housing Association Ltd
Springfield Parish Council
Springfield Primary School
Springfields Planning & Development Limited
SSE Pipelines Ltd
St Anne's Preparatory School
St Augustine's Catholic Church
St Cedd's School
St John Payne Catholic School
St John's C of E Primary School
St Joseph's Catholic Primary School
St Mary's CE Primary School
St Mary's Church Great Baddow
St Peters Primary School
St Pius X Catholic Primary School
St. Michael's Junior School
Stephenson's of Essex Ltd
Stevens VW Dismantlers
Stock CE Primary School
Stock Parish Council
Stonebond Properties Ltd
Stow Maries Parish Council
Strutt & Parker LLP
Swan Housing Association
Sworders
Tarmac
Telecom Plus PLC
Tendring District Council
Terence O'Rourke Ltd
Terling and Fairstead Parish Council
Thames Gateway South Essex Partnership Ltd
The Beaulieu Park School
The Boswells School
The British Horse Society
The Cathedral School Chelmsford
The Chelmsford Ballet Company
The Chelmsford Labour Party
The Chelmsford Society
The Coal Authority
The Downes Planning Partnership
The Essex Badger Protection Group
The Gypsy Council
The Inland Waterways Association (Chelmsford Branch)
The John Bishop Partnership
The JTS Partnership LLP
The Land Trust
The Landscape Conservation Trust
The National Cycling Charity – CTC
The National Federation of Gypsy Liaison Groups

The Owen Partnership
The Royal Horticultural Society
The Sandon School
The Showmen's Guild of Great Britain
The Theatres Trust
The Tyrells Primary School
The Wilderness Foundation UK
The Writtle Surgery
Third Dimension Group Ltd
Three
Thriftwood School
Thurrock Borough Council
TMA Chartered Surveyors
Tolhurst Fisher LLP Solicitors
Total Gas and Power Ltd
Transition Chelmsford
Transport East
Transport for London
Traveller Law Reform Project
Travelling Showmans Guild
Tree Fella Plc
Trinity PPP Limited
Trinity Road Primary School
Trinity St Mary's CE (VA) Primary School
Tritton Family Trust
Turley Associates
UK Power Networks
Uttlesford District Council
Village Hall Committee
Virgin Media Services
Vitol Gas Ltd
Vodafone and O2
W & H Marriage & Sons Ltd
Waitrose Ltd
Wallace Land Investments
Waltham Forest CCG
Waltham Forest London Borough Council
Warwick Court Property Company
Waterhouse Farm Residents Association
WEA Sec
Wernick Buildings Ltd
West Essex CCG
West Hanningfield Parish Council
West Register (Realisations) Ltd
Westlands Community Primary School
WH Marriage & Sons Ltd
Whirledge and Nott
Widford Lodge Preparatory School
William de Ferrers School
Willingale Parish Council
Wilson Construction Ltd
Womens Institute
Woodham Ferrers and Bicknacre Parish Council
Woodham Mortimer with Hazeleigh Parish Council
Woodham Walter Parish Council
Woodland Trust
Woodville Primary School
Woolf Bond Planning
Writtle University College
Writtle Infant School
Writtle Junior School
Writtle Neighbourhood Plan Group
Writtle Parish Council
Writtle VDS
YMCA Chelmsford
Essex Local Nature Partnership

CONSULTATION STATEMENT

REVIEW OF CHELMSFORD LOCAL PLAN
REGULATION 18 - ISSUES AND OPTIONS

Chelmsford City Council has published its Regulation 18 Issues and Options consultation on the Review of its adopted Local Plan. This consultation is accompanied by an Integrated Impact Assessment.

The consultation runs for eight weeks from **10am on Thursday 11 August 2022 until 4pm on Thursday 6 October 2022.**

Regulation 18 Issues and Options Consultation Document
This Regulation 18 Issues and Option consultation is the first formal stage in the preparation of the review of the adopted Chelmsford Local Plan, and the first opportunity for residents, businesses, developers, and other interested parties to get involved.

The main purpose of the document is to ensure that the review of the adopted Local Plan will cover the right issues and that all suitable options for accommodating change are considered. The main areas we are consulting on include:

- Updated challenges and opportunities to address over the reviewed Local Plan period to 2041
- Updated draft Strategic Priorities
- New draft Vision
- The approach to calculating future development requirements, including homes and jobs
- Spatial Approaches for accommodating additional future development growth, and
- The approach to reviewing planning policies.

Regulation 18 Issues and Options Integrated Impact Assessment (IIA) Consultation Document
The adopted Local Plan was developed alongside a comprehensive Sustainability Appraisal (SA) and Habitats Regulations Appraisal (HRA) process. For this review process, the Council is including other aspects of sustainable development in an Integrated Impact Assessment (IIA), which covers the following:

- Sustainability Appraisal
- Strategic Environmental Assessment
- Habitats Regulations Assessment
- Health Impact Assessment
- Equality Impact Assessment.

Where to view the documents and how to make representations:

View and comment online
You can view and comment on the consultation documents on the City Council's Consultation Portal at: www.chelmsford.gov.uk/planningpolicyconsult This is our preferred method to comment.

If you have not used this system before or have any difficulties logging in please see our guidance notes at:www.chelmsford.gov.uk/lp-portal-guide or call us (01245) 606330.

View in person
Paper copies can be viewed at the City Council Customer Service Centre, Civic Centre, Duke Street, Chelmsford, CM1 1JE Monday to Friday 10am to 4pm (Please note we are closed on bank holidays).

Comment via email
Comments may be submitted by email: planning.policy@chelmsford.gov.uk

Paper comments
You can submit your comments by post or deliver them in person in the following ways:
Post: Spatial Planning Services, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE
By hand: Monday to Friday 10am to 4pm - Customer Service Centre, Civic Centre, Duke Street, Chelmsford, CM1 1JE (outside of these hours you can use the post box outside the Customer Service Centre).

If you do not have access to a computer, you can request paper copies. A charge will be made to cover printing and postage costs.

If you have difficulties making representations by e-mail or post due to a disability, please call us (01245) 606330.

How to find out more:
We will be hosting an online virtual exhibition as well as having an in-person exhibition at the Council Offices. Here you can view our exhibition boards which contain a summary of the consultation (please note both forms of exhibition will have the same information available).

Virtual exhibition: Will be available to view via www.chelmsford.gov.uk/lp-exhibition

In-person exhibition: Drop in exhibitions will take place at the Civic Centre, where you will be able to speak to a representative of the Council. There is no booking required to attend these exhibitions, which will take place at the Chelmsford City Council Chamber, accessed via Customer Service Centre, Civic Centre, Duke Street, Chelmsford, CM1 1JE on the following dates and times:

- Thursday 8th September 2022, 6pm to 9pm
- Friday 9th September 2022, 10am to 1pm
- Friday 9th September 2022, 2pm to 5pm
- Saturday 10th September 2022, 10am to1pm

Local Plan Website: Please visit our website www.chelmsford.gov.uk/lp-review for further information on the consultation and the Local Plan review process.

Please note that any representations made by you must be received by the Council no later than 4pm on Thursday 6 October 2022.

The Council will acknowledge receipt of your comments and fully consider them, although we will not enter into individual correspondence.

All duly-made comments will be published on the Council's Consultation Portal in accordance with the General Data Protection Regulations.

Section 149 of the Equality Act 2010 requires that the Council should avoid any form of discrimination and also foster good relations between different ethnic groups. Comments which are deemed to be discriminatory will be inadmissible and will not be accepted.

David Green
Director of Sustainable Communities August 2022

EXHIBITION

Welcome

Thank you for visiting today

What is the Local Plan

Our Local Plan shapes future growth and development of Chelmsford City Council's area. It sets out a positive vision, identifies where and how new development should take place in the future as well as areas and land uses that will be protected.

Why are we reviewing the adopted Chelmsford Local Plan?

We adopted our current Local Plan in May 2020. We need to review the plan at least every five years, to see if we need to update it. This is to make sure it remains up to date and meets the changing needs of our current and future residents.

This consultation is called the Issues and Options. It is our first stage towards updating the adopted Local Plan and is a starting point for us to engage with our communities.

We need to make sure that we are planning for new housing, jobs and infrastructure to meet local needs until 2041. If the Local Plan becomes out of date, the Council could have very little influence over the location of new development and supporting infrastructure.

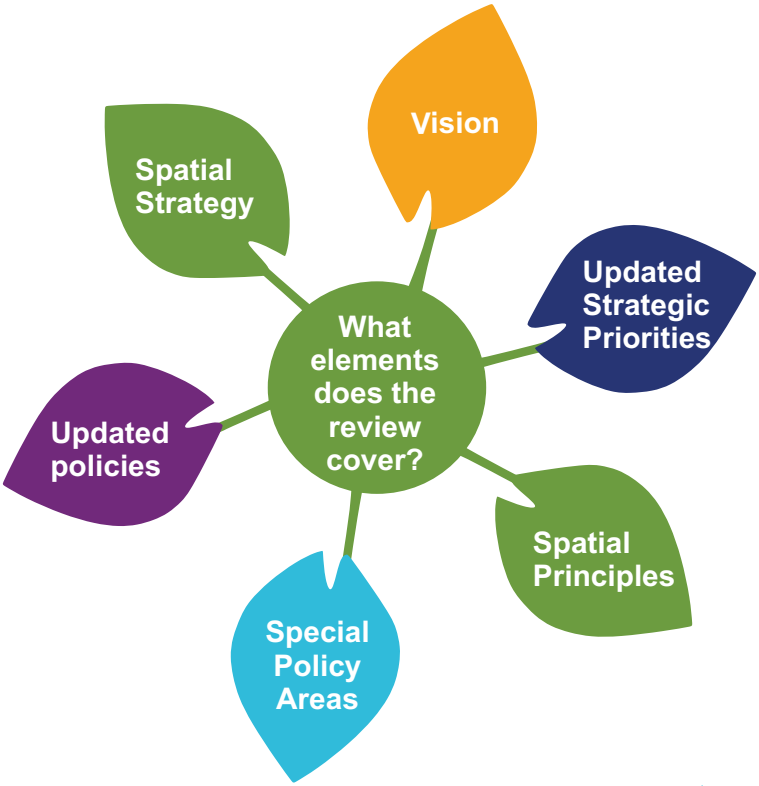
What is included in the consultation?

We want to make sure we cover the right issues and that all the suitable options for accommodating change are considered. The main areas we are consulting on are:

- Updated draft Strategic Priorities
- New draft Vision
- The approach to future development numbers, including homes and jobs
- Spatial Strategy Approaches for accommodating additional future growth to 2041
- The approach to reviewing our planning policies.

We think that many parts of the adopted Local Plan and its policies are still up to date and generally performing well, so may require no or only partial changes. Other parts will need updating alongside additional new policies that are required to reflect the latest national planning policy requirements, the Council's new ambitions and aspirations, and to meet new development growth to 2041.

As such, the review process is expected to result in changes to the adopted Local Plan – but we are not working on a completely new plan. Also, the review will not reopen any debates about sites already allocated in the Local Plan.



Chelmsford Local Plan

Key Challenges and Opportunities

There are a number of key challenges and opportunities for the Local Plan to address over the period to 2041. These cover requirements of national planning policy and regulations that we must meet, as well as local issues that we need to respond to.

Key challenges that we have identified include:

- Meeting Chelmsford's new housing and employment requirements to 2041
- How can we address the climate and ecological emergency?
- What can we do to address the affordable housing crisis?
- How will economic change impact employment opportunities including recovery from Covid-19?
- The future role of City/town centre retail areas including changes in how people shop, and changes to the Use Classes Order, including Permitted Development
- The role of Special Policy Areas (SPA) for large institutions that lie outside the built-up areas, where ordinarily policy would constrain new development
- The need to build stronger communities with community infrastructure, improved health and wellbeing
- How do we protect and increase biodiversity (net gain)?
- Ensuring that development provides great places and spaces
- How can sustainable and active travel be incorporated further into the Local Plan?

Key opportunities that we have identified include:

- Chelmsford is ranked as one of the least deprived local authorities in England, however there are pockets of deprivation in the urban area of Chelmsford
- Essex is forecast to experience significant new growth and change over the coming decades
- A strong and growing economy and employment base, with opportunities for sector development, innovation, and new technologies
- Good connectivity by road and rail with a new Chelmsford North East bypass and rail station opening in North East Chelmsford in the mid-2020s
- A high-quality environment with a growing multifunctional green infrastructure offer including new country parks, play areas, green spaces and greening the built environment
- A growing network of cycleways and an extensive Green Wedge network providing opportunities to increase active and sustainable transport
- New development will contribute through S106 contributions and Community Infrastructure Levy payments towards new and improved services, facilities and infrastructure in the area
- Tackling the climate and ecological emergency can support the development of green jobs, reduce flood risk and create new habitats
- Planned new community facilities and services, including schools, early years and childcare and shops can improve social integration.



Chelmsford was the first town granted **City status** in Essex

The population of Chelmsford has increased by 7.8% from around 168,300 in 2011 to **181,500 in 2021**

Chelmsford is at the **heart of Essex**, being centrally located within the County and adjoined by seven neighbouring local authorities

Chelmsford Local Plan

Vision (Chelmsford in the future)

The Local Plan Vision is a high-level guiding statement that sets out what is important for a place and how change will be managed in the future. It is a core part of a Local Plan and all the policies in the Plan will together deliver the Vision.

How we are reviewing the Vision

We have reviewed the Local Plan Vision to reflect the new local priorities within Our Chelmsford, Our Plan, which is the Council's updated Corporate Plan. We have also considered other national and local priorities and Chelmsford's challenges and opportunities. It has also been simplified, shortened and purposefully aligned to the Council's new corporate plan, to make it easier to use.

The Vision is also designed to contribute to creating sustainable development and provides a good foundation for the review of the remainder of the adopted Local Plan.

The proposed updated Vision is:

Guiding Chelmsford's growth towards a greener, fairer and more connected community.

Our Strategic Priorities

Our Strategic Priorities are the key priorities that the Local Plan is based on. It is very important that we consider these issues which might have a wider impact, not only within but also outside the Council's area. They look at what Chelmsford is like today, how things are changing, the issues that need to be addressed, and what opportunities may be created in future. These priorities set the overall policy direction for all the strategic policies, site allocations and development management policies in the Local Plan.

We are proposing some new priorities to help us act on the climate change and ecological emergency, and others have been updated to reflect new opportunities. We have also grouped the priorities to make sure the links between them are clear and that they can act together to achieve the best outcomes.

Priorities for climate



Addressing the Climate and Ecological Emergency (NEW priority)



Promoting smart, active travel and sustainable transport (NEW priority)



Protecting and enhancing the natural and historic environment, and support an increase in biodiversity and ecological networks

Priorities for growth



Ensuring sustainable patterns of development and protecting the Green Belt



Meeting the needs for new homes



Fostering growth and investment and providing new jobs

Priorities for place



Creating well designed and attractive places, and promoting the health and social wellbeing of communities



Delivering new and improved infrastructure to support growth



Encouraging resilience in retail, leisure, commercial and cultural development

Chelmsford Local Plan

How much growth are we planning for?

The adopted Local Plan has allocated sites for development which are now coming forward, with Masterplans being approved and planning applications decided or in progress.

In reviewing the Local Plan, we need to work out how many more houses and jobs we need to plan for until 2041. Using a formula set by the Government, called the standard method, we can work out a minimum figure for the number of houses needed. Then we add a buffer to make sure we can be flexible if some sites do not come forward, to meet the housing needs of specific groups, and to significantly boost the supply of different sizes and types of homes in the Council's area.

We estimate this to be an additional 7,966 homes by 2041.

The Local Plan will also need to meet future employment needs, and it may mean allocating some additional sites for employment development. We are carrying out a study of employment needs to make sure we can update our policies to support the economy in terms of providing sites for new jobs if required.

Spatial Principles

Our aim is to get the right type of development in the right places to meet the growing needs of local people and businesses while protecting our environment. We will consider a number of things to guide development to the most sustainable locations. We call these the Spatial Principles.

We want to update these through the review of the Local Plan. They are similar to what we have adopted in the Local Plan, with some changes to wording to make sure they are up to date.

Proposed Spatial Principles
a) Locate development at well-connected and sustainable locations
b) Protect the Green Belt from inappropriate development
c) Promote the use of suitable previously developed land for development
d) Continue and enhance the renewal and vitality of Chelmsford City Centre and its Urban Area
e) Focus development at the higher order settlements outside the Green Belt and respect the development pattern and hierarchy of other settlements
f) Respect the character and appearance of landscapes and the built environment, and preserve or enhance the historic environment and biodiversity
g) Locate development to avoid or manage flood risk and reduce carbon emissions
h) Ensure development is served by necessary infrastructure and encourage innovation
i) Locate development to utilise existing and planned infrastructure effectively
j) Ensure development is deliverable

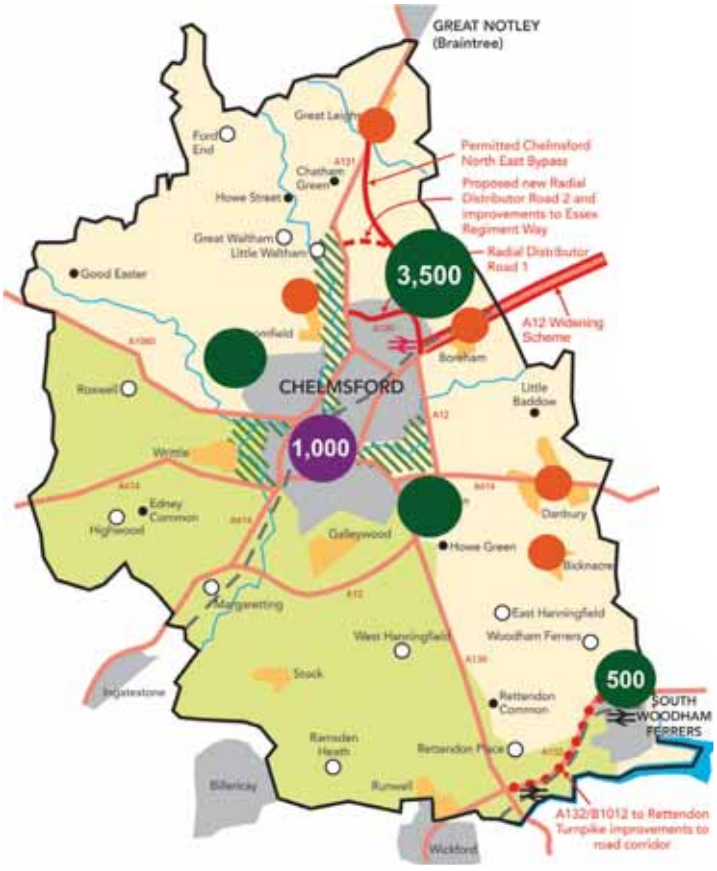
Where could growth be located?

There are several ways that growth can be accommodated, and therefore where sites are allocated. We consider an area's population, proximity to facilities, wellbeing of residents, land availability, what you tell us during the consultation, and lots of evidence on important matters.

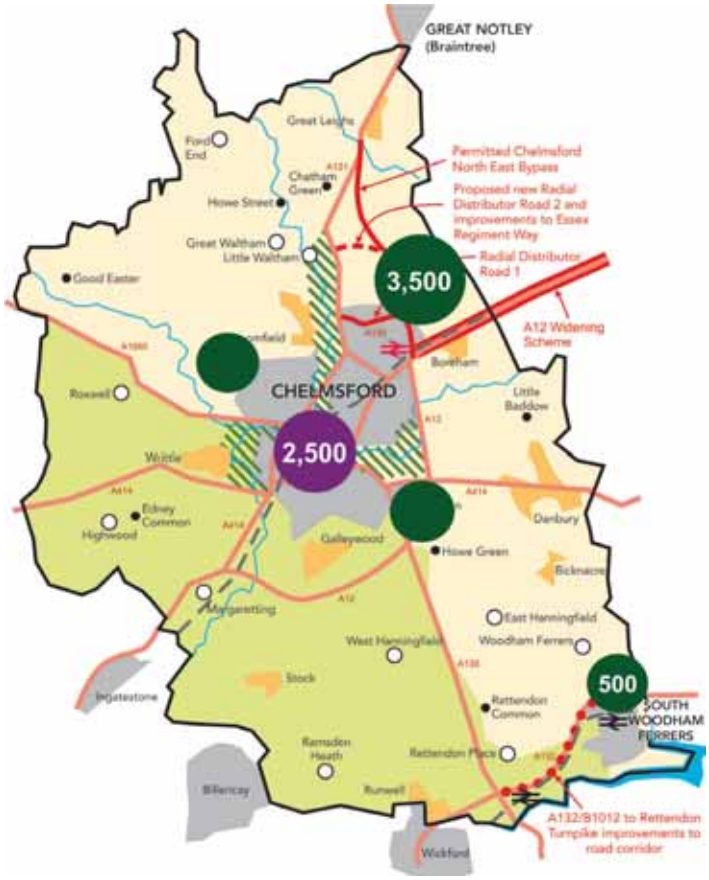
We are looking at different approaches to see how the growth we need can be accommodated. The five approaches (referenced A to E) set out the same amount of growth but use different types of location. We do not identify any preferred options or specific development sites. We have shown an indicative number of homes for each location, which will be refined and informed by the results of the consultation and the evidence.

None of these include areas in the Green Belt, which is not being considered for new development allocations.

The feedback we receive during the consultation will be key to deciding which approach to follow, which might not be one of the five listed, but a combination of the most sustainable and deliverable elements.



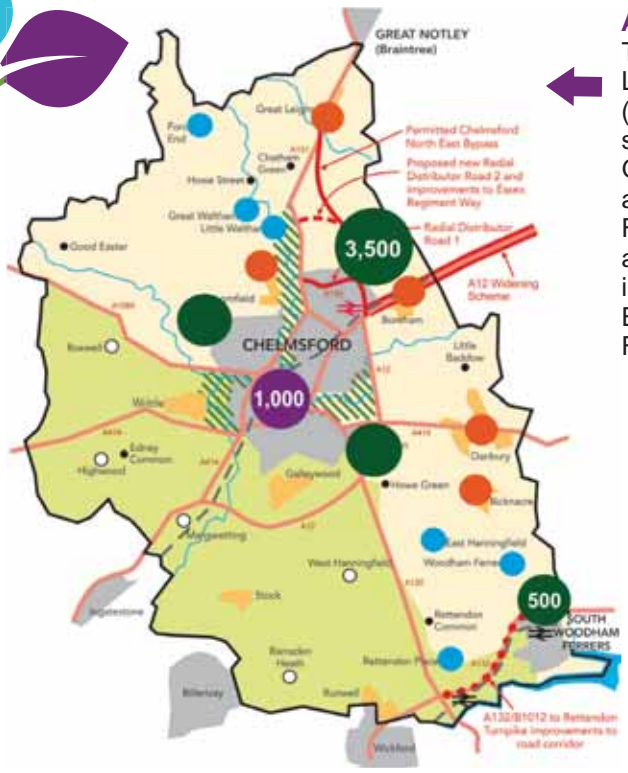
Approach A – Growing the existing strategy - This continues the approach already being used in the adopted Local Plan, with new allocations on previously developed land (1,000) and at larger villages (1,500 in total across one or more of the settlements of Bicknacre, Boreham, Broomfield, Danbury or Great Leighs) and expanding allocated sites (1,500 in total across West and East Chelmsford, 500 at South Woodham Ferrers and 3,500 at Chelmsford Garden Community).



Approach B – Concentrating growth in urban areas - This continues the approach already being used in the adopted Local Plan, but maximises development in the City Centre and urban area (2,500) and expands allocated sites (1,500 in total across West and East Chelmsford, 500 at South Woodham Ferrers and 3,500 at Chelmsford Garden Community).

Chelmsford Local Plan

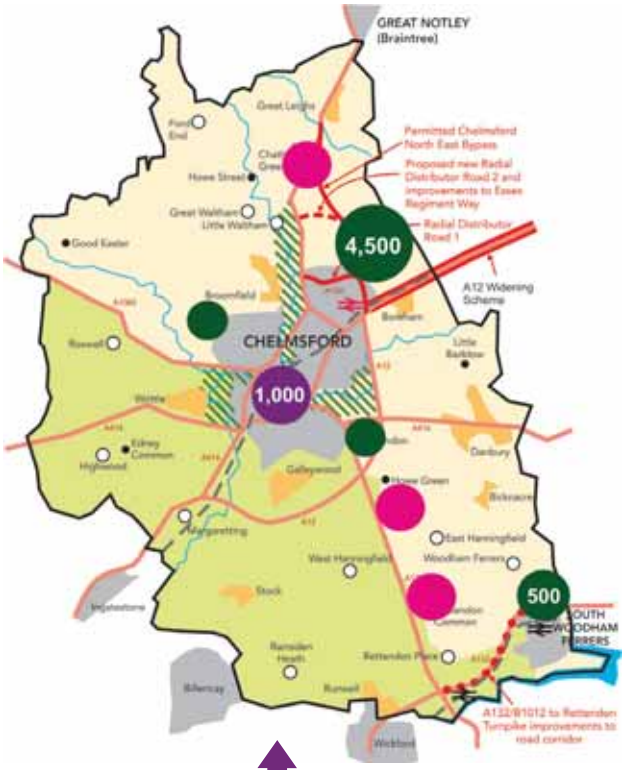
Where could growth be located?



Approach C – Exploring a wider strategy -
This continues the approach already being used in the adopted Local Plan, with new allocations on previously developed land (1,000) and at larger villages (1,000 in total across one or more settlements of Bicknacre, Boreham, Broomfield, Danbury or Great Leighs), and expanding allocated sites (1,500 in total across West and East Chelmsford, 500 at South Woodham Ferrers and 3,500 at Chelmsford Garden Community). In addition, it proposes some development at smaller villages (500 in total across one or more settlement of East Hanningfield, Ford End, Gt Waltham, Lt Waltham, Rettendon Place and Woodham Ferrers).



Approach E – Exploring a new settlement -
This continues the approach already being used in the adopted Local Plan, with new allocations on previously developed land (1,000) and expanding the Chelmsford Garden Community (3,000). In addition, it proposes a large new settlement/garden community (4,000 at Hammonds Farm, east of A12/north of A414).



Approach D – Exploring growth along transport corridors -
This continues the approach already being used in the adopted Local Plan, with new allocations on previously developed land (1,000), expanding allocated sites (500 in total across West and East Chelmsford, and 500 at South Woodham Ferrers), and maximising growth at Chelmsford Garden Community (4,500). In addition, it proposes some growth along main transport corridors (1,500 in total across one or more settlement of Chatham Green, Howe Green and Rettendon Common).

Chelmsford Local Plan

Sustainable development

It's very important to make sure the Local Plan is focused on the most sustainable way of meeting the area's needs.

This covers a number of aspects, which we are reviewing through an independent Integrated Impact Assessment (IIA). This assesses social, economic and environmental effects of the review of the Local Plan, alongside health and equality impacts. We will be asking some separate questions about this as part of the consultation.

The IIA advises on ways in which any adverse effects could be avoided, reduced or mitigated or how any positive effects could be maximised. This helps us to ensure that any changes to the policies and allocations in the Local Plan are promoting sustainable development. The IIA covers the following:

- Sustainability Appraisal (SA)
- Strategic Environmental Assessment (SEA)
- Habitats Regulations Assessment (HRA)
- Health Impact Assessment (HIA)
- Equality Impact Assessment (EqIA).

This will be repeated at each stage of the Local Plan review. We will publish a report to accompany each consultation showing the assessment, the outcomes of previous consultation stages, how comments have been taken into consideration, and any changes which are proposed to the review of the Plan as a result.



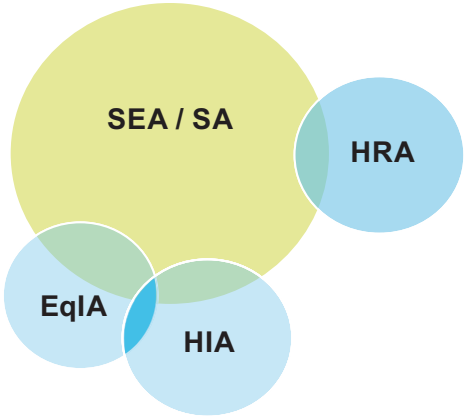
Other evidence

Local Plans are not developed in isolation, they must be based on evidence. We will be updating some existing evidence base studies and producing some new ones to inform the review of the Local Plan. These include:

- Strategic Housing Needs Assessment
- Employment Needs Study
- Strategic Housing and Employment Land Availability Assessment (SHELAA)
- Retail and Leisure Needs Study
- Village/Settlement Audits
- Infrastructure Delivery Plan
- Viability Assessment
- Strategic Flood Risk Assessment
- Water Cycle Study
- Transport studies and highways modelling
- Heritage Impact Assessment
- Open Space Assessment.

These will all be published on our website as they are produced so you can see what we have based our decisions on. As the review progresses, we will also summarise key evidence into 'topic papers' which will give an overview of what the evidence is saying.

Overlap between the different forms of assessment



Chelmsford Local Plan

How to comment

This is your opportunity to feed into the review process at an early stage and help to shape the plan and the future of your area.

You can view the consultation documents on our specially designed consultation portal www.chelmsford.gov.uk/planningpolicyconsult

The consultation documents are:

- Issues and Options Consultation Document 2022 (with questions included)
- Integrated Impact Assessment (IIA) of the Review of the Adopted Local Plan

Our preferred means of receiving comments is through the consultation portal. This ensures that your comments are recorded accurately and are processed quickly. This system also allows you to download the consultation documents and sign up for alerts to future consultation events.

You can also make comments:

- By email to planning.policy@chelmsford.gov.uk
- By post to Spatial Planning Services, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE.

There will be opportunities to meet with planning staff face-to-face at public drop-in exhibitions or to attend a webinar during the consultation period.

We have also published a summary newsletter.

You can find out more on our website www.chelmsford.gov.uk/lp-review

The consultation on the Issues and Options document runs for ten weeks from 10am on Thursday 11 August to 4pm on Thursday 20 October 2022.

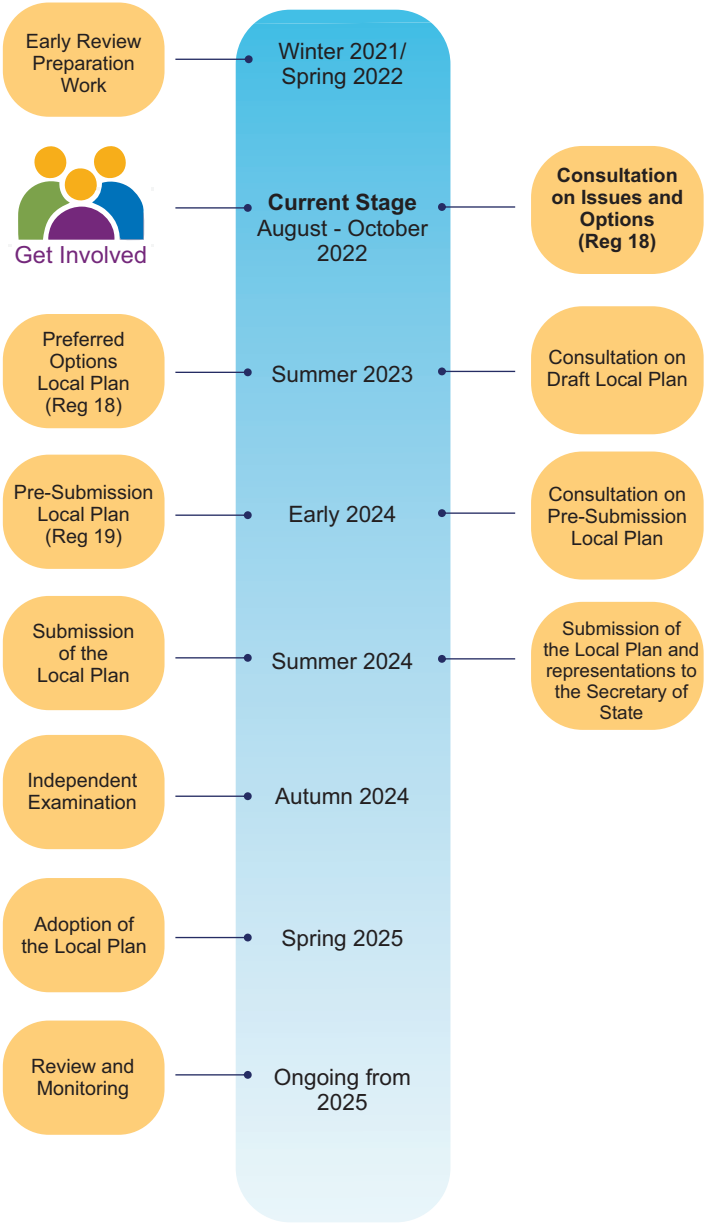
What happens next

We will consider all the comments received alongside further studies, the findings of the IIA and national planning policy to develop preferred options and specific proposals for sites and policies.

This will be set out in a Preferred Options Review Plan, which will be published for public consultation in summer 2023.

The key stages in the new Local Plan preparation are:

Timetable of Local Plan review



Chelmsford Local Plan

Frequently Asked Questions

What status does the Issues and Options Local Plan have?

In accordance with the NPPF, as this is the first stage of the Review of the Local Plan (which is early in the Plan making process) limited weight in the determination of planning applications will be given to this consultation document.

What will happen to the current Local Plan?

The current adopted Local Plan will remain in place until such time as the review is complete. At this point the review Plan will replace the current adopted Local Plan.

How can I bring land forward for development?

You can promote land to us through our Call for Sites facility. Sites submitted to us will be assessed through our Strategic Housing and Employment Land Availability Assessment (SHELAA) following the close of the Issues and Options Consultation.

More information can be found on our website at: **https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-local-plan/call-for-sites-shelaa-and-parish-maps/**

What does the Review mean for Neighbourhood Planning?

South Woodham Ferrers and Writtle have adopted Neighbourhood Plans which form part of the adopted Local Plan. They will be checked when the reviewed Local Plan is adopted to ensure they remain compatible.

Work will continue on the emerging Neighbourhood Plans for Boreham, Broomfield, Danbury, East Hanningfield, Little Baddow, and Sandon. They will need to reflect the current stage of the review of the Local Plan as they progress.

What has new development brought to Chelmsford?

The priorities of the adopted Local Plan, delivery of allocated sites and developer contributions are bringing new development, improvements and infrastructure to Chelmsford, including:

- Housing and commercial development
- Community facilities
- Transport infrastructure
- Community Infrastructure Levy (CIL) contributions.

Are there other Local Plan exhibitions?

We have rearranged in-person exhibitions at the Chelmsford Council Chamber to the following dates:

- Friday 7th October 2022, 11am to 2pm
- Saturday 8th October 2022, 10am to 1pm

SCAN ME

Chelmsford Local Plan

POP-UP STAND

Review of Chelmsford Local Plan

Chelmsford City Council is reviewing its adopted Local Plan. This will set out where new development will take place up to 2041.



Find out more at
www.chelmsford.gov.uk/lp-review
Get involved by registering at
www.chelmsford.gov.uk/planningpolicyconsult

Chelmsford Local Plan

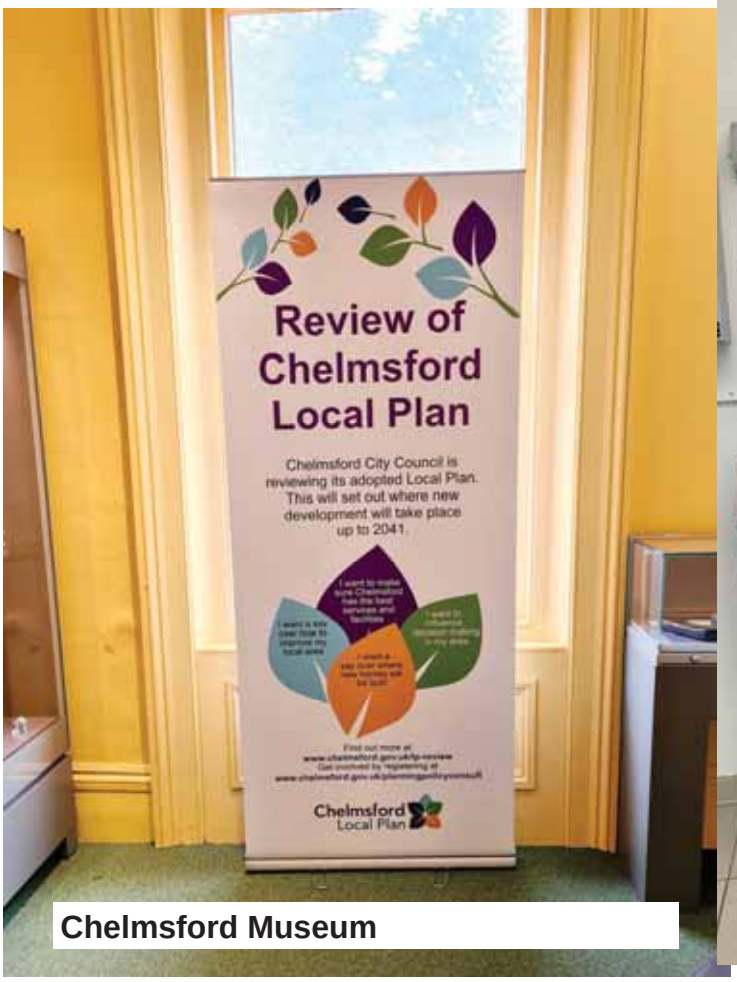
POP-UP STANDS ON SITE



Chelmsford Sport and Athletics Centre



Riverside Leisure Centre



Chelmsford Museum



South Woodham Ferrers Leisure Centre

Click on the link, or copy and paste into your browser, to view the consultation materials.

Local Plan Video: https://youtu.be/ZGpTRMhDIhw



Online virtual exhibition: https://chelmsford.vercel.app/



Review of the Chelmsford Local Plan - Get involved now!

The Council's Local Plan was adopted in 2020 and guides growth and development across Chelmsford City Council's area to 2036. It sets out how much new development is needed and identifies land for housing, schools, shops and jobs as well as areas for protection, such as open space and sites important for wildlife.

The Council is commencing a review of its adopted Local Plan with the first Issues and Options consultation running from 11 August to 6 October 2022.

The review process is expected to result in changes to the adopted Local Plan – but we are not working on a completely new plan from scratch. It is also not a reopening of any debates about already allocated sites.

The purpose of the consultation is to ensure that the review covers the right issues and that all suitable options for accommodating change are considered. The main areas we are consulting on include:

- Updated challenges and opportunities to address over the reviewed Local Plan period to 2041
- Updated draft Strategic Priorities
- New draft Vision
- The approach to calculating future development requirements, including homes and jobs
- Spatial Approaches for accommodating additional future development growth, and
- The approach to reviewing planning policies.

For more information go to **www.chelmsford.gov.uk/lp-review**

Why **should I** get involved?



Chelmsford Local Plan

Essex Chronicle 11 August 2022

Review of the Chelmsford Local Plan - CONSULTATION PERIOD EXTENDED TO 20 OCTOBER 2022 & NEW EXHIBITION DATES

Thank you to those who have already made comments. If you haven't yet it's not too late!

The Council's Local Plan was adopted in 2020 and guides growth and development across Chelmsford City Council's area to 2036. It sets out how much new development is needed and identifies land for housing, schools, shops and jobs as well as areas for protection, such as open space and sites important for wildlife.

The Council is commencing a review of its adopted Local Plan with the first Issues and Options consultation running from 11 August to the extended date of 20 October 2022.

The review process is expected to result in changes to the adopted Local Plan – but we are not working on a completely new plan from scratch. It is also not a reopening of any debates about already allocated sites.

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- Updated draft Strategic Priorities
- New draft Vision
- The approach to calculating future development requirements, including homes and jobs
- Spatial Approaches for accommodating additional future development growth, and
- The approach to reviewing planning policies.

For more information visit our virtual exhibition at **https://chelmsford.vercel.app/**, or go to **www.chelmsford.gov.uk/lp-review**

In-person public exhibitions rescheduled at The Civic Centre, Duke Street, Chelmsford, CM1 1JE on the following dates and times:

- **Friday 7th October 2022, 11am to 2pm**
- **Saturday 8th October 2022, 10am to 1pm**

Why **should I** get involved?



Chelmsford Local Plan

Essex Chronicle 22 September 2022

17 January 2023 3:20 pm

News

Chelmsford City Council reviews Local Plan to address climate and affordable housing crises

By Charlotte Maltby

JUL 6, 2022 business, consultation, green spaces, housing, leisure

Chelmsford City Council has now started to review its Local Plan, to take account of changes in City Council priorities and Government policies. This will affect how the city will grow up to 2041 and the City Council is keen to involve local people in shaping the city's future.

This is all set out in a report to the Chelmsford Policy Board on 14 July 2022. The council is proposing a new strategic vision, to guide Chelmsford's growth to be a greener, fairer and more connected community.

Local Plans must be reviewed every five years

The council must produce a Local Plan or else decisions about development are left in the hands of the Government and developers. The Government requires all councils to review their Local Plan every five years. As Chelmsford City Council adopted its Local Plan in May 2020, the council must review it by May 2025 and that needs to start now, to properly involve the community.

To address changes in council and government policy, growing population and other issues including the climate crisis, the review extends the document to 2041. When extending the framework by five years, the council has to take into account rising population and growth in the city, so must recalculate housing demand. This affects how and where development should go.





Your feedback will guide the Local Plan

The Local Plan allows local decision-making on how to meet a community's economic, environmental, housing and social needs. Following consultation in 2015 to 2018, the Council adopted the Local Plan 2013-2036 in May 2020.

The council will be consulting with you on the review, and it is very important that you take part.

Looking ahead, the council has developed five broad approaches to address the city's growth. Feedback from residents will guide the council on which approach the council should adopt or adopt a mix of approaches.

Local Plan review consultation begins in August

At this early stage, the consultation document does not present updated policy or specific site allocations for housing or other uses. This will follow further work, feedback from this consultation and evidence gathering, and will be presented in the next stage which covers the preferred options. Throughout the document residents are asked questions to help capture views.

"Population and housing growth is inevitable," said **Cllr. Stephen Robinson, leader of Chelmsford City Council.** "It is vital that we guide that growth to address the climate and ecological emergency and the housing affordability crisis, and deliver the infrastructure and services we need to be a more connected community.

"We need you to help us make the important decisions and shape our future community," emphasised Cllr. Robinson.

"We will be starting the formal consultation on 11 August, and it will run for eight weeks to give people time to take part.

"There are five broad approaches to allocating growth around the district and no decisions have been made about any of this. The Local Plan review is an open consultation, and I really urge all residents to take part.

"We will ensure there will be lots of opportunities for you to get involved. You can listen online when the review is discussed at the Chelmsford Policy Board on 14 July, and we'll regularly remind you about it on social media. Don't forget, you can read all the documents on the council website."

More details about the consultation soon

We'll have an update on the Local Plan review consultation soon and we'll be streaming the council's policy board meeting on 14 July. Details of how to tune in will be posted on the Chelmsford City Council website.

Chelmsford City Council recommended to object to new power line proposals »
« Live music grant for Hylands Estate



By Charlotte Maltby

Charlotte writes stories about recycling and waste, parks, economic development, local democracy and planning.

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17 January 2023 3:13 pm

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News

Chelmsford's future – have your say!

By Charlotte Maltby

AUG 11, 2022 city, green spaces, planning

Chelmsford's Local Plan - have your say

Did you know that a lot of how Chelmsford develops in the next 20 years could be influenced by you?

The council has to have a Local Plan to guide its future growth so that Chelmsford is a greener, fairer and more connected community. **We want you to be part of this process.**

The Local Plan affects every resident of Chelmsford. It sets out how Chelmsford will grow, where businesses and homes will be located, and how we will protect our green environment and heritage.

The Government requires every council to have a local plan, otherwise developers and the Government can decide where to build houses.

We're reviewing the plan

Councils have to review their local plan every five years. Chelmsford City Council adopted its current Local Plan in 2020 and must therefore start a review in order to complete it by 2025. The review will also extend the horizon of the Local Plan from 2036 to 2041.

This means we have to reassess our housing and employment needs to take into account projected rising population and growth in the city. So we're asking for your views.

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Share your LGBTQ+ journey for an exhibition coming to @ChelmsMuseum in June 2023. 🏳️‍🌈 Co-produced by @EssexPride and @ChelmsMuseum,

Travel

Options for Chelmsford's future growth

Looking ahead, the council has developed **five different approaches** that could be followed to address the city's growth. **It is likely that the preferred approach might not be one of the five listed, but a combination of the most sustainable and deliverable elements**.

The consultation is not a vote on which specific location is the most or least popular, but a way of assessing issues and finding the most sustainable overall strategy for delivering the area's needs. That includes our environment, infrastructure, business and education opportunities.

This is the first stage of consultation, so there will be many opportunities to be involved. There will be further consultations as the plan evolves and you will be asked for your views along the way.



Public consultation – your voice counts

Starting Thursday, 11 August you can have your say as the council starts its public consultation on the review.

> "Chelmsford City Council must address the climate & ecological emergency, the housing crisis and the need to create a more connected community. In addition, the council must take into account Government legislation and other council policies. We need to build communities (with infrastructure) not just houses.
>
> "The council wants input from residents to help shape the city for current and future generations and to guide how to address these priorities. This is your opportunity to influence the future of your city, so it's really important that you do have your say. There are many ways you can get involved, so do please take part in this consultation."
>
> *Cllr Stephen Robinson, Leader, Chelmsford City Council*

Consultation starts Thursday 11 August

There will be many opportunities to find out more and voice your views.

The consultation on the Issues and Options document runs for an extended period of eight weeks from **10am on Thursday 11 August to 4pm on Thursday 6 October 2022**.

Tweets from @Essex_Travel

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Where you can view Local Plan documents

Online

You can view the consultation documents and make comments on the Council's planning policy consultation portal www.chelmsford.gov.uk/planningpolicyconsult..

They will also be available to read during normal opening hours at the Council's Customer Service Centre at the Civic Centre, Duke Street, Chelmsford.

You can view an online exhibition available during the consultation period – this can be found at www.chelmsford.gov.uk/lp-exhibition.

In person

We will also be holding in-person exhibitions at the Civic Centre. These exhibitions will provide an opportunity for you to find out more and discuss the consultation with a planning officer.

Exhibition dates are:

- Thursday 8 September 6pm – 9pm
- Friday 9 September 10am – 1pm
- Friday 9 September 2pm – 5pm
- Saturday 10 September 10am – 1pm

How to respond with your views

- Via our consultation portal at www.chelmsford.gov.uk/planningpolicyconsult
- By email to planning.policy@chelmsford.gov.uk
- By post to Spatial Planning Services, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE.

All comments will be used to inform the next stage of the process which is when the council chooses its preferred option.

What has the plan delivered so far?

Feedback from earlier consultations is already reflected in the current plan. It has delivered new space for business and employment, 5,000 homes to cater for different household sizes, including affordable housing, and infrastructure such as schools and green spaces. It has expanded sustainable transport, including cycleways, with a new railway station in north Chelmsford planned to open in the next four years.



Council calls for an end to major tax avoidance by businesses »

« Gaia comes to Chelmsford Cathedral



By Charlotte Maltby

Charlotte writes stories about recycling and waste, parks, economic development, local democracy and planning.

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17 January 2023 3:12 pm

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News

Open house about Chelmsford's future

By Charlotte Maltby

SEP 6, 2022 culture, democracy, green spaces, housing, planning



Now is your chance to speak to the team who are reviewing proposals for Chelmsford's future to 2041 as part of our Local Plan. The plan will affect everyone who lives, works or studies in Chelmsford.

What will it mean for you?

Options for Chelmsford's future growth

The Local Plan will shape how Chelmsford develops in the next 20 years.

The council has developed **five different approaches** that could be followed to address the city's growth. **It is likely that the preferred approach might not be one of the five listed, but a combination of the most sustainable and deliverable elements**.

The consultation is not a vote on which specific location is the most or least popular, but a way of assessing issues and finding the most sustainable overall strategy for delivering the area's needs. That includes our environment, infrastructure, business and education opportunities.

Speak to us: 8-10 September

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Share your LGBTQ+ journey for an exhibition coming to @ChelmsMuseum in June 2023. Co-produced by @EssexPride and @ChelmsMuseum, Behind the Rainbow will share experiences of LGBTQ+ people in Chelmsford and Essex.

Travel



The first public consultation about the review of the plan will run until 6 October. The Local Plan is reviewed every five years, so don't miss the chance to have your say at this stage.

We'll be inviting you into the Civic Centre this week to meet our policymakers. They'll be available at a real time exhibition to tell you more and help with any questions you may have.

There are three dates to choose from:

Thursday 8 September 6pm – 9pm

Friday 9 September 10am – 1pm

Friday 9 September 2pm – 5pm

Saturday 10 September 10am – 1pm

The exhibition will be at the Civic Centre, Duke Street, Chelmsford, CM1 1JE.

Virtual tour of the Local Plan review

If you can't get to one of these sessions, don't worry, you can view a virtual exhibition online. This will allow you to see the proposals and options and explains how you can take part in the consultation: https://chelmsford.vercel.app/.



Tweets from @Essex_Travel

Essex T... @... 17m

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The full Local Plan document is available online: Local Plan Review 2022 – Chelmsford City Council. However, to make it more convenient, the exhibition offers a summary where you can focus on the area that is most relevant to you.

We're reviewing the plan

The council has to have a Local Plan to guide its future growth so that Chelmsford is a greener, fairer and more connected community. Without an up-to-date local plan, the council could have very little influence over the location of new development and the provision of infrastructure.

Councils have to review their local plan every five years. Chelmsford City Council adopted its current Local Plan in 2020 and must therefore start a review in order to complete it by 2025. The review will also extend the horizon of the Local Plan from 2036 to 2041.

This means we have to reassess our housing and employment needs to take into account projected rising population and growth in the city. So we're asking for your views.

Have your say on Chelmsford's future

This is the first stage of consultation, so there will be many opportunities to be involved. There will be further consultations as the plan evolves and you will be asked for your views along the way.

> "Chelmsford City Council must address the climate and ecological emergency, the housing crisis and the need to create a more connected community. In addition, the council must take into account Government legislation and other council policies. We need to build communities (with infrastructure) not just houses."
>
> The council wants input from residents to help shape the city for current and future generations and to guide how to address these priorities. This is your opportunity to influence the future of your city, so it's really important that you do have your say. There are many ways you can get involved, so do please take part in this consultation."
>
> *Cllr Stephen Robinson, Leader, Chelmsford City Council*

Where to view documents

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By Charlotte Maltby

Charlotte writes stories about recycling and waste, parks, economic development, local democracy and planning.

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News

Local Plan review consultation extended

By Charlotte Maltby

SEP 23, 2022 city, green spaces, housing, planning



Owing to the period of national mourning for Her Majesty Queen Elizabeth II, we postponed some scheduled drop-in exhibitions about our Local Plan review.

The consultation period for the review has consequently been extended until 4pm on 20 October 2022 and new dates have been announced for the drop-in sessions.

New drop-in exhibition dates

The rescheduled drop-in exhibitions at the Civic Centre (Duke Street, Chelmsford, CM1 1JE) will take place on the following dates:

Friday 7 October 11am to 2pm
Saturday 8 October 10am to 1pm

Come along and speak to the team who are reviewing proposals for Chelmsford's future to 2041.

Local Plans decide where new developments go

This won't be the only chance to have your say on Chelmsford's future, but it is an important one. **Local Plans decide where new development goes in principle and once sites are allocated it means they will almost certainly be developed.**

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Share your LGBTQ+ journey for an exhibition coming to @ChelmsMuseum in June 2023. 🏳️‍🌈 Co-produced by @EssexPride and @ChelmsMuseum,

Travel

This is the first stage of our current 5-yearly review and there will be further steps before the Local Plan review is finalised, but **this is a crucial time to share your views about how and where the city develops.**

To help explain why the Local Plan is such a key part of our planning process and why you should get involved now, we've produced this summary. It shows at a glance how residents' views feed into the different stages of planning the future of Chelmsford.



Approaches for Chelmsford's future growth

The council has developed **five different approaches** that could be followed to address the city's growth. **It is likely that the preferred approach might not be one of the five listed, but a combination of the most sustainable and deliverable elements**.

The consultation is not a vote on which specific location is the most or least popular, but a way of assessing issues and finding the most sustainable overall strategy for delivering the area's needs. That includes our environment, infrastructure, business and education opportunities.

Virtual tour of the Local Plan review

If you can't get to one of these sessions, don't worry, you can view a virtual exhibition online. This will allow you to see the proposals and approaches and explains how you can take part in the consultation: https://chelmsford.vercel.app/.

The full Local Plan document and more information is available online on the Chelmsford City Council website.

Tweets from @Essex_Travel

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Where to view documents

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All comments will be used to inform the next stage of the process which is when the council chooses its preferred option.

Mayor of Chelmsford leads city's Proclamation »
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By Charlotte Maltby

Charlotte writes stories about recycling and waste, parks, economic development, local democracy and planning.

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News

Chelmsford's future! Deadline approaching

By Charlotte Maltby

OCT 14, 2022

Consultation closes this Thursday, 20 October

The planning team at Chelmsford has been gathering views from across the city since August. Chelmsford has to have a **Local Plan** to guide future growth. We are reviewing the adopted Local Plan to ensure it remains up to date and continues to meet the changing needs of our residents.

Our planners are urging residents: don't miss out on the last few days to have your say – it's your chance to help shape plans for your city's future!



Views will feed into evolving plan

One of the routes for feedback was a webinar held this week. Affordable housing, changing housing needs and sustainable transport infrastructure were some of the issues very much on people's minds. You can read points raised and responses here https://www.chelmsford.gov.uk/media/232mjbkl/issues-and-options-faq.pdf

What's important to you and your family?

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Over the weekend @ChelmsTheatre hosted its first shows following a six-month refurbishment. We're thrilled to share the first photos of the stylish new front-of-house spaces

Travel

Make sure you take the opportunity to have your say too. **But hurry – it's the last few days of the first stage of public consultation on the current review of the plan – it ends at 4pm this Thursday, 20 October!**

This won't be the only chance to have your say on Chelmsford's future, but it is an important one. The Local Plan is reviewed once every five years, so now is a crucial time. There will be further steps as the Local Plan evolves, but this is the time to share your views about how and where the city develops.



Approaches for Chelmsford's future growth

The council has developed five different approaches that could be followed to address the city's growth. It is likely that the preferred approach might not be one of the five listed, but a combination of the most sustainable and deliverable elements.

The consultation is not a vote on which specific location is the most or least popular, but a way of assessing issues and finding the most sustainable overall strategy for delivering the area's needs. That includes our environment, infrastructure, business and education opportunities.

Virtual tour of the Local Plan review

You can view a virtual exhibition that summarises the plan online. This will allow you to see the proposals and approaches and explains how you can take part in the consultation: https://chelmsford.vercel.app/

The full Local Plan document and more information is available online on the Chelmsford City Council website.

Tweets from @Essex_Travel

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Where to view documents

You can view the consultation documents and make comments on the Council's planning policy consultation portal: www.chelmsford.gov.uk/planningpolicyconsult

They are also available to read during normal opening hours at the Council's Customer Service Centre at the Civic Centre, Duke Street, Chelmsford.

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By post to Spatial Planning Services, Chelmsford City Council, Civic Centre,

Duke Street, Chelmsford, CM1 1JE

All comments will be used to inform the next stage of the process which is when the council chooses its preferred option.

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Review of Chelmsford's Local Plan - get involved!

Chelmsford City Council's Local Plan was adopted in 2020 and it currently guides growth and development across Chelmsford City Council's area to 2036.

It sets out how much new development is needed and identifies land for housing, schools, shops, and jobs as well as areas for protection, such as open space and sites important for wildlife. The Government requires that all councils review their Local Plan every five years, so the review needs to be complete by May 2025. The first consultation stage towards updating the adopted Local Plan is open now and runs until 6 October 2022.

The consultation document only identifies broad locations rather than specific boundaries for development. Does the **"Issues and Options consultation"** document identify new development around South Woodham Ferrers?
Yes, it does! North of South Woodham Ferrers is identified as a location as having the potential for 500 new homes in Spatial Approaches A, B, C and D.

Where to view and comment on the documents?
All information on this consultation is available at: www.chelmsford.gov.uk/lp-review
View and Comment online
You are encouraged to view and comment online, using a specially designed Consultation Portal. This helps record comments accurately so they can be processed quickly.

Go to www.chelmsford.gov.uk/planningpolicyconsult

View in person
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Paper comments - You can submit your comments by post or deliver them in person in the following ways:
Post: Spatial Planning Services, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE
By hand: Monday to Friday 10am to 4pm - Customer Service Centre, Civic Centre, Duke Street, Chelmsford, CM1 1JE (outside of these hours you can use the post box outside the Customer Service Centre).

Your Town Council will be making comments and also encourages residents to make their own comments directly to CHELMSFORD CITY COUNCIL.

South Woodham Focus 2 September 2022

LOCAL PLAN ISSUES AND OPTIONS CONSULTAION
Local Plan Issues and Options Appendix 1 Policy Board 140722. A consultation has begun and residents are encouraged to read the consultation and take part. Please see link attached.

Visit our website To view the documents from Chelmsford City Council.

CUS Council News

Residents can also view a hard copy of the document from the Town Council office at Champions Manor Hall. A visual display will be placed in the foyer (date to be confirmed with Chelmsford city Council) and this will be advertised when available on our website and on social media.

South Woodham Focus 16 September 2022

POSTER

Review of Chelmsford Local Plan – Get Involved Now!

The Council is starting a review of its adopted Local Plan. We would like your views on the key issues facing Chelmsford and options for planning the City's future – including the amount and potential locations for new development of homes, jobs and infrastructure.

Chelmsford's Local Plan was adopted in 2020 and guides growth and development across Chelmsford City Council's area to 2036. We are reviewing it to identify land for further housing, schools, shops and jobs as well as areas for protection, such as open space and sites important for wildlife, up until 2041.



Have Your Say!

The Issues and Options Consultation runs from 10am on Thursday 11 August 2022 until 4pm on Thursday 6 October 2022.

Read and comment on the documents at **www.chelmsford.gov.uk/planningpolicyconsult.**

They will also be available to read during normal opening hours at the Council's Customer Service Centre in Chelmsford.

There is an online exhibition available during the consultation period – this can be found at **www.chelmsford.gov.uk/lp-exhibition.**

We will also be holding in-person exhibitions at the Civic Centre. These exhibitions will provide an opportunity for you to find out more and discuss the consultation with a Planning Officer.

Visit an exhibition:

Thursday 8th September 2022	Civic Centre	6pm - 9pm
Friday 9th September 2022	Civic Centre	10am - 1pm
Friday 9th September 2022	Civic Centre	2pm - 5pm
Saturday 10th September 2022	Civic Centre	10am - 1pm

Find out more at **www.chelmsford.gov.uk/lp-review**, telephone (01245) 606330 or email **planning.policy@chelmsford.gov.uk**

Chelmsford Local Plan

SCAN ME

Chelmsford City Council

EXAMPLES OF SOCIAL MEDIA POSTS

Chelmsford City Council
August 11 at 12:07 PM ·

What will #Chelmsford look like in 20 years' time?

It's your city and now is the time to have your say

We're looking at the Local Plan which will guide:... See more



Chelmsford City Council
22h ·

Don't miss your chance to have a say on #Chelmsford's future

The consultation period on the Local Plan review has been ext

We also have new dates for our drop-in sessions, when you c
proposals in the plan.

Or you can visit the virtual exhibition which outlines proposal
years.

Read more here:



CITYLIFE.CHELMSFORD.GOV.UK
Local Plan review consultation extended
The consultation period for the review has been extended until 20 October 2

Chelmsford City Council
4h ·

Speak to us about plans for Chelmsford

8-10 September

Come to the Civic Centre this week to talk about #Chelmsford's future. We're holding four sessions and it's your chance to see an exhibition and discuss proposals included in our Local Plan review which will guide the city's growth to 2041 and where future development will happen ... See more



CITYLIFE.CHELMSFORD.GOV.UK
Open house about Chelmsford's future
Now is your chance to speak to the team who are reviewing proposals for Chelmsford's future ...

2

Chelmsford City Council @ChelmsCouncil · Aug 12

Did you know that how #Chelmsford develops in the next 20 years could be influenced by you?

A consultation on the next phase of our Local Plan is running until 6 October and it's really important to have your say

Find out more



youtube.com
Chelmsford's Local Plan - have your say
Did you know that a lot of how Chelmsford develops in the next 20 years could be influenced by you? ...

2 2 2

Chelmsford City Council @ChelmsCouncil · Aug 12

Information about how to take part can be found at chelmsford.gov.uk/lp-review

Please remember that only comments made via the official consultation can be accepted ✅

Comments on social media cannot be considered ❌

1 1

Chelmsford City Council @ChelmsCouncil · Sep 16

1/3
Owing to the period of national mourning for Her Majesty the Queen, our Local Plan review consultation has been extended.

The deadline to take part in the consultation is now 20 October.



1 1

Chelmsford City Council @ChelmsCouncil · Sep 16

2/3
Drop-in sessions due to take place on 9 and 10 September have been rescheduled.

We will now be holding sessions on 7 and 8 October at the Civic Centre where you'll be able to see an exhibition of the Local Plan review, talk to planners and ask questions.

1 1

Chelmsford City Council @ChelmsCouncil · Sep 16

3/3
There is no need to book, just come along to the Civic Centre: chelmsford.gov.uk/.../getting-to...

You can find out more about the Local Plan review and visit a virtual exhibition on the council website: chelmsford.gov.uk/.../local-plan...

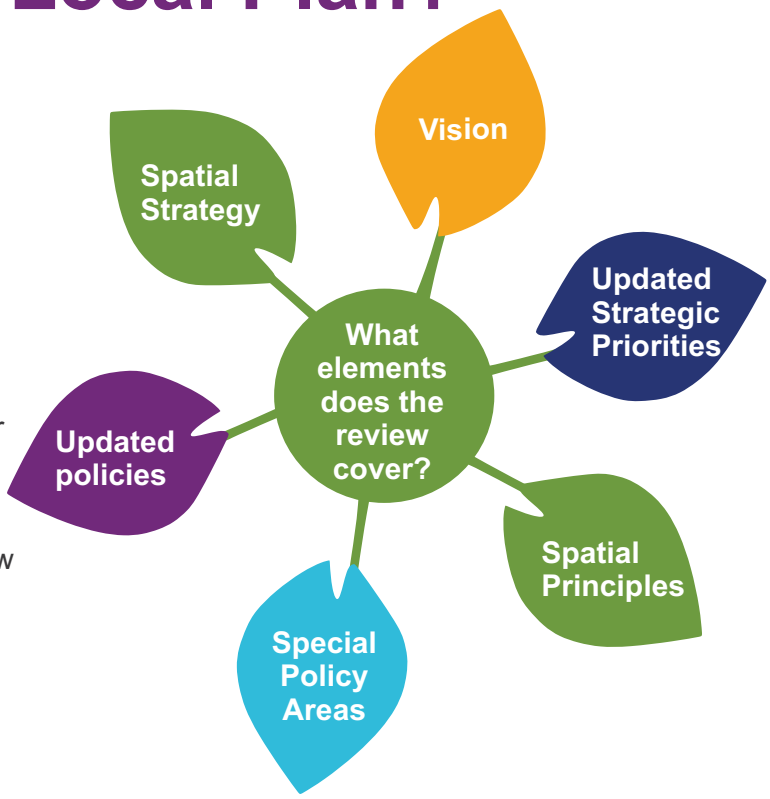
Chelmsford Local Plan

Local Plan Review Newsletter

NUMBER 1 August 2022

What is a Local Plan?

The Local Plan will shape future growth and development of the City Council's area. It sets out a positive vision, identifies where and how new development should take place in the future as well as areas and land uses that will be protected.



Why are we reviewing the adopted Chelmsford Local Plan?

The Government requires all councils to review their Local Plan every five years. This will ensure that it remains up to date and continues to meet changing needs of our current and future residents. As we adopted the Local Plan in May 2020, we must review it by May 2025 and so the process is starting now.

This consultation, known as Issues and Options, is the first stage towards updating the adopted Local Plan and provides a starting point for engagement with our communities.

What is included in the consultation?

The main areas we are consulting on are:

- Updated draft Strategic Priorities
- New draft Vision
- The approach to future development numbers, including homes and jobs
- Spatial Strategy Approaches for accommodating additional future growth to 2041
- The approach to reviewing our planning policies.

We think that many parts of the adopted Local Plan and its policies are still up to date and generally performing well, so may require no or only partial changes. Other parts, however, will need updating alongside additional new policies that are required to reflect the latest national planning policy requirements, the Council's latest ambitions and aspirations and to meet new development growth to 2041. Therefore, the review process is expected to result in changes to the adopted Local Plan – but we are not working on a completely new plan from scratch. It is also not a reopening of any debates about already allocated sites.

What are the Spatial Strategy Approaches?

In reviewing the Local Plan, we propose to accommodate the growth needed until 2041. The consultation proposes we plan for an additional 7,966 homes over and above those allocated in the adopted plan - but our aim is to get the right type of development in the right places to meet the growing needs of local people and businesses while protecting our environment.

The consultation document sets out five approaches for accommodating the additional development growth needed. The approaches all set out the same amount of development overall, but use different elements of the locations for potential growth, which could also include new employment development. We are not considering growth in the Green Belt, which is the light green shading on the plans below.

This consultation does not identify any preferred options or specific development sites. The preferred approach will be informed by the outcome of this consultation and future evidence gathering.



Approach A – Growing the existing strategy - This continues the approach already being used in the adopted Local Plan, with new allocations on previously developed land (1,000) and at larger villages (1,500 in total across one or more of the settlements of Bicknacre, Boreham, Broomfield, Danbury or Great Leighs) and expanding allocated sites (1,500 in total across West and East Chelmsford, 500 at South Woodham Ferrers and 3,500 at Chelmsford Garden Community).



Approach B – Concentrating growth in urban areas - This continues the approach already being used in the adopted Local Plan, but maximises development in the City Centre and urban area (2,500) and expands allocated sites (1,500 in total across West and East Chelmsford, 500 at South Woodham Ferrers and 3,500 at Chelmsford Garden Community).



Approach C – Exploring a wider strategy - This continues the approach already being used in the adopted Local Plan, with new allocations on previously developed land (1,000) and at larger villages (1,000 in total across one or more settlements of Bicknacre, Boreham, Broomfield, Danbury or Great Leighs), and expanding allocated sites (1,500 in total across West and East Chelmsford, 500 at South Woodham Ferrers and 3,500 at Chelmsford Garden Community). In addition, it proposes some development at smaller villages (500 in total across one or more settlement of East Hanningfield, Ford End, Gt Waltham, Lt Waltham, Rettendon Place and Woodham Ferrers).



Approach D – Exploring growth along transport corridors - This continues the approach already being used in the adopted Local Plan, with new allocations on previously developed land (1,000), expanding allocated sites (500 in total across West and East Chelmsford, and 500 at South Woodham Ferrers), and maximising growth at Chelmsford Garden Community (4,500). In addition, it proposes some growth along main transport corridors (1,500 in total across one or more settlement of Chatham Green, Howe Green and Rettendon Common).



Approach E – Exploring a new settlement - This continues the approach already being used in the adopted Local Plan, with new allocations on previously developed land (1,000) and expanding the Chelmsford Garden Community (3,000). In addition, it proposes a large new settlement/garden community (4,000 at Hammonds Farm, east of A12/north of A414).

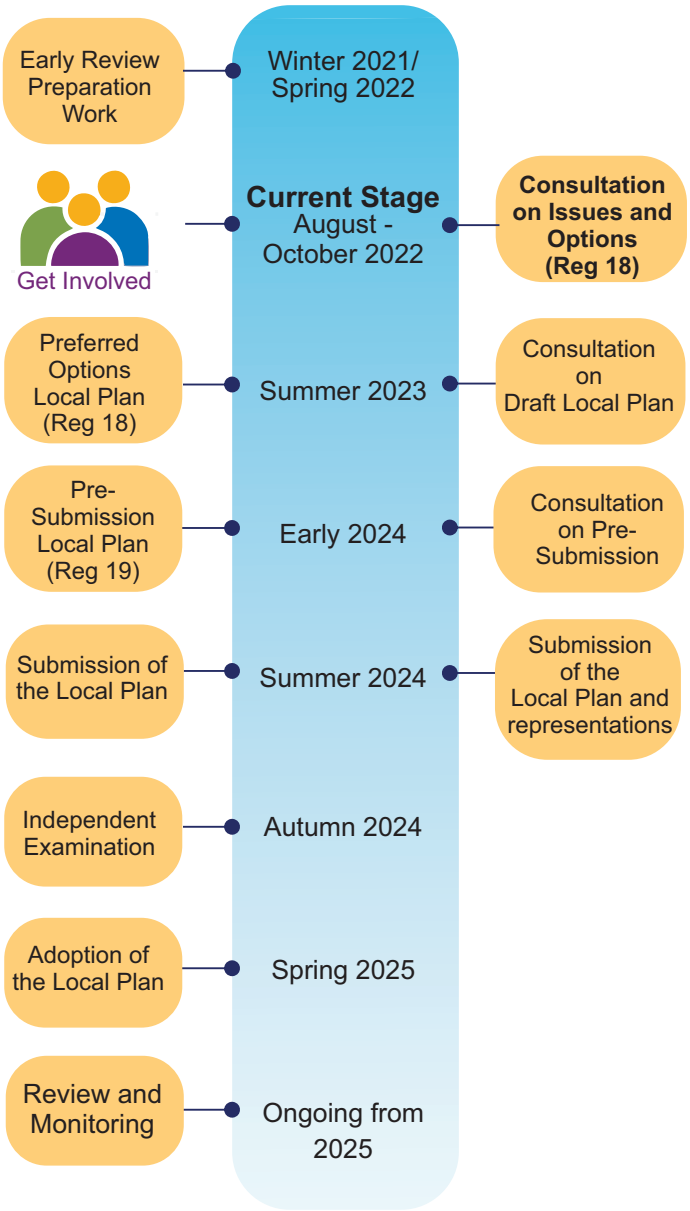
What is the Integrated Impact Assessment (IIA)?

The IIA identifies the key sustainability issues for the review of the Local Plan. These feed into a framework against which the proposals will be assessed. It will cover the potential environmental, social, economic and health performance of the Local Plan and any reasonable alternatives. The IIA will assess the following aspects of sustainable development:

- Sustainability Appraisal (SA)
- Strategic Environmental Assessment (SEA)
- Habitats Regulations Assessment (HRA)
- Health Impact Assessment (HIA)
- Equality Impact Assessment (EqIA)

We will be consulting on the IIA as part of the Issues and Options consultation.

What is the Local Plan timetable?



Where can I view the consultation documents?

The consultation documents will be available to view and comment on the Council's planning policy consultation portal **www.chelmsford.gov.uk/planningpolicyconsult.**

They will also be available to read during normal opening hours at the Council's Customer Service Centre in Chelmsford.

There is an online exhibition available during the consultation period – this can be found at **www.chelmsford.gov.uk/lp-exhibition.**

We will also be holding in-person exhibitions at the Civic Centre. These exhibitions will provide an opportunity for you to find out more and discuss the consultation with a Planning Officer.

In-person exhibition dates are:

- Thursday 8th Sept 6pm – 9pm
- Friday 9th Sept 10am – 1pm
- Friday 9th Sept 2pm - 5pm
- Saturday 10th Sept 10am – 1pm

Have Your Say

Consultation dates and how to have your say

The consultation on the Issues and Options document runs for an extended period of eight weeks from 10am on Thursday 11 August to 4pm on Thursday 6 October 2022.
You can respond:

- Via our consultation portal at www.chelmsford.gov.uk/planningpolicyconsult.
- By email to planning.policy@chelmsford.gov.uk
- By post to Spatial Planning Services, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE.

All comments will be used to inform the next stage of the process, the Preferred Options Review Plan.

Chelmsford City Council



This publication is available in alternative formats including large print, audio and other languages

Please call 01245 606330

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Chelmsford City Council
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www.chelmsford.gov.uk

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Chelmsford City Council

Appendix Ai Issues and Options List of Respondents (Organisations)

Anglian Water Services Ltd

Aquila Developments ltd

Barratt David Wilson

Basildon Borough Council

Bellway Homes Ltd (Essex)

Bellway Homes Ltd (Essex)

Bellway Strategic

Black Notley Parish Council

Bloor Homes (Eastern)

Bolton, S&D

Boreham Conservation Society

Boreham Parish Council

Bradwell Power Generation Company Ltd

Braintree District Council

Brentwood Borough Council

Broadfield Homes Ltd

Broomfield Parish Council

C J H Farming Ltd

Castle Point Council

Charterhouse Property Group & Charterhouse Strategic Land

Chelmer Valley Landscape Group

Chelmsford Garden Community Consortium

Chelmsford Labour Party

Chignal Parish Council

CHP

Cliffords Group Ltd

Cliffords Group Ltd, David Lloyd Leisure and Aquila Development Ltd

Colchester City Council

Countryside Partnerships

Crest Nicholson

Croudace Homes

Danbury Parish Council

Dandara

Dandara

Dandara Eastern

Dominus Chelmsford Limited

East Hanningfield Parish Council

East of England Ambulance Service NHS Trust

Edward Gittins Associates

Environment Agency

Essex & Suffolk Water

Essex Bridleways Association

Essex County Council

Essex County Fire and Rescue Service

Essex Local Nature Partnership

Essex Police Fire and Crime Commissioner

Galleywood Parish Council

Gladman Developments Ltd

Gleeson Land

Gray & Sons

Great & Little Leighs Parish Council

Great Baddow Parish Council

Great Notley Parish Council

Great Waltham Parish Council

Greystoke CB

H R Philpot & Sons

Harris Strategic Land Limited

Hill Farm (Chelmsford) Ltd

Hill Residential Ltd

Historic England

Home Builders Federation

Hylands Construction Company Ltd

Inland Homes

Inspired Villages

L&Q

Landvest Developments Ltd

Little Baddow Parish Council

Little Baddow Society

Little Waltham Parish Council

London & Cambridge Properties Limited

Maldon District Council

Marden Homes Ltd

Martin Grant Homes

Medical Services Danbury

Mid and South Essex Integrated Care Board (ICB)

Miscoe Enterprises Ltd

Natural England

Newlands Spring Residents Association

North Fambridge Parish Council

North West Parishes Group

Obsidian Strategic Asset Management Ltd

Pembridge Land Group

Persimmon Homes

Pigeon (Sandon) Ltd

Place Services Historic Environment Team

Ptarmigan Chelmsford A Limited

Ravenscraig Close Ltd

Redrow Homes & Speakman Family

Richborough

Rochford District Council

Rosehart Properties Ltd

Save Sandford Mill Campaign

Saxtons 4x4

Sedum Ltd

Sempra Homes Ltd.

SJT Developments Ltd

South Woodham Ferrers Town Council

Sport England

Springfield Parish Council

Stonebond (Chelmsford) Ltd.

Stonebond Properties Ltd

Stow Maries Parish Council

Strutt and Parker (Farms) Limited

Tarmac

Taylor Wimpey

Taylor Wimpey Strategic Land

The Bucknell Family

The Coal Authority

The Essex Badger Protection Group

The Howgego Trust

The Planning Bureau

The Showmen's Guild of Great Britain London and Home Counties

The Woodland Trust

Theatres Trust

Transport for London

Tritton Farming Partnership LLP

Uttlesford District Council

Vistry Group

W & H Marriage & Sons Limited

Wates Developments and Hammonds Estates LLP

Wates Developments Limited

Woodham Walter Parish Council

Writtle Parish Council

Writtle University College and Endurance Estates

Appendix B



Chelmsford Local Plan

Preferred Options Consultation Document

You Said We Did Feedback Report

February 2025

Our Planning Strategy 2022 to 2041

Chelmsford Local Plan

PREFERRED OPTIONS YOU SAID WE DID

Contents

Abbreviations 1
Executive Summary 2
Introduction 8
Purpose of this 'You Said We Did' Report 8
Section 1: Summary of Consultation Undertaken 9
Section 2: Summary of Representations 11
Section 3: How the evidence base has informed the Pre-Submission Local Plan 15
Section 4: Main Issues Raised in Consultation Responses and high-level summary of how they have informed the Pre-Submission Local Plan 22
List of Appendices 171

Abbreviations

BNG	Biodiversity Net Gain
CCC	Chelmsford City Council
CIL	Community Infrastructure Levy
CNG	Compressed Natural Gas
CLT	Community Land Trust
DSB	Defined Settlement Boundary
ECC	Essex County Council
EDG	Essex Design Guide
EPOA	Essex Planning Officers Association
ESP	Employment and Skills Plan
EqIA	Equality Impact Assessment
EV	Electric Vehicle
GI	Green Infrastructure
GTAA	Gypsy and Traveller Accommodation Assessment
HAR	Heritage At Risk
HIA	Health Impact Assessment
HMO	House in Multiple Occupation
IDP	Infrastructure Delivery Plan
IIA	Integrated Impact Assessment
IWM	Integrated Water Management
LCWIP	Local Walking and Cycling Infrastructure Plan
LNR	Local Nature Reserve
LNRS	Local Nature Recovery Strategy
LPA	Local Planning Authority
LTP	Local Transport Plan
MMO	Marine Management Organisation
NCN	National Cycle Network
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
SANG	Suitable Alternative Natural Greenspace
SFRA	Strategic Flood Risk Assessment
SGS	Strategic Growth Site
SME	Small and Medium Sizes Enterprises
SHELAA	Strategy Housing and Employment Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SHNA	Strategic Housing Needs Assessment
SPA	Special Policy Area
SRA	Specialist Residential Accommodation
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
TCPA	Town and Country Planning Association
UAB	Urban Area Boundary

Executive Summary

This report sets out:

- Summary of the Preferred Options consultation (Section 1)
- Summary of representations received (Section 2)
- Summary of how the Chelmsford Local Plan Pre-Submission (Regulation 19) Document (shortened to 'Pre-Submission Local Plan' throughout the rest of this document) has been informed by more recent evidence base studies (Section 3)
- The main issues raised in the representations received and a high-level summary of CCC's response to the comments made and how they have informed the Pre-Submission Local Plan (Section 4).

It supersedes the Preferred Options Feedback Report published in October 2024.

The Preferred Options Consultation Document set out the preferred spatial strategy for new homes and jobs for the future growth and development of the city up to 2041. It also contained updated and new policies which would be used to determine planning applications.

About the Consultation

A comprehensive six-week programme of consultation took place during the formal consultation period from 10am on Wednesday 8th May 2024 to 4pm on Wednesday 19th June 2024. The consultation was promoted through a range of activities including email/letter notifications to more than 2,800 contacts registered on the Council's Consultation Portal, on the Council's website, press releases, adverts in local publications and social media. Consultation activities included placing consultation documents on deposit at the Council's Customer Service Centre, organised stakeholder presentations, Duty to Co-operate meetings, a virtual exhibition and staffed physical exhibitions.

Summary of responses to the Preferred Options Local Plan

A total of 10,418 comments were received to the consultation from 3,678 respondents. The respondents are from a wide variety of groups and individuals including residents, developers, landowners and their agents, businesses and statutory bodies such as other local authorities and Parish/Town Councils. All the comments received can be viewed on the Council's Consultation Portal.

An overview of the key issues raised to the draft plan is provided below.

Overall:

- A wide range of feedback was received ranging from general comments to technical observations on detailed policy wording
- New policies, policies proposed for more substantive changes, and some new land allocations for development attracted the greatest level of comments
- Some policies of the plan did not attract any comments

- Most Government or national bodies either support the plan outright or offer qualified support subject to some proposed amendments
- Mix of support and opposition from Town/Parish Councils, with many suggesting changes from minor amendments to the deletion of site allocations
- Most public comments were objecting to one or more aspects of the plan, though there was limited support
- Hammonds Farm and Junction 18 of the A12 (SGS16a-b) received very large numbers of public objections, with an organised campaign established by Little Baddow, Danbury, Boreham and Sandon Parish Councils coordinating responses
- Many developers/landowners support development proposed on their sites, with some seeking changes to the allocations policies and boundaries
- Many developers/landowners object where the plan did not allocate specific land or sites for development and call for Green Belt and Green Wedge reviews.

Strategic Priorities:

- Support for the preferred Strategic Priorities including new Strategic Priorities 1 and 2
- Some detailed wording amendments proposed including strengthening the emphasis on addressing climate change and on meeting housing needs in full
- References to some other strategies and plans are proposed including the Essex Local Nature Recovery Strategy and the Council's Plan for Improving Rivers and Waterways
- Some call for a review of the Green Belt to identify sites which may be more suitable for development and to provide a more balanced/sustainable Spatial Strategy.

Vision:

- Overall support for the Vision
- Requests for more explanation on how the Vision bullet points relate to the Vision and will be used in future decision making
- Some detailed wording amendments proposed to the Vision bullet points including adding references to multifunctional green/blue infrastructure and Biodiversity Net Gain
- Additional bullet points proposed including around supporting rural areas and rural tranquillity
- Some comments suggesting that Hammonds Farm is contrary to the Vision.

Spatial Principles:

- Good level of general support
- Some developers consider there should be a Green Belt review to identify sustainable development opportunities in this area
- Some developers call for more development to be focused on lower order settlements
- Some detailed wording amendments, and an additional principle proposed around integrating strategic green infrastructure with ecological networks and the wider landscape.

Strategic Policies for creating sustainable development:

- Overall support for the Strategic Policies including new policies S14 (Health and Wellbeing) and S16 (Connectivity and Travel)
- Many objections from the development industry to policy requirements which exceed national planning policy including net zero homes (Policy S2) and 20% biodiversity net gain (Policy S4)
- Concerns over the evidence base for some new policy requirements, including net zero homes (Policy S2) and Health Impact Assessments (Policy S14)
- Some detailed wording changes proposed to expand, amend, clarify and update policies
- Some additional policy requirements proposed including to assist with the delivery of biodiversity net gain and ecosystems restoration (Policy S2)
- References to some other strategies and guidance are proposed including the Chelmsford Health and Wellbeing Plan (Policy S14)
- Support for promoting sustainable travel methods but concerns are raised about how feasible and deliverable these will be in some areas
- Support for the investment and improvements to key infrastructure, although some concerns about the funding and timing of infrastructure.

Strategic Policies for how future development growth will be accommodated:

- Mix of support and opposition to Development Requirements (Policy S6) and the Spatial Strategy (Policy S7)
- Requests from Castle Point and Southend-on-Sea City Councils as to whether Chelmsford City Council can accommodate any of their unmet housing need
- Adjustments requested to the Settlement Hierarchy
- Some developers are calling for higher housing and employment requirements
- Some developers request a specific requirement around meeting the housing needs of older people
- Objections to some site allocations in particular, Hammonds Farm (SGS16a) and Junction 18 A12 Employment Area (SGS16b) and calls for their removal/replacement. There is also limited support for these development proposals
- Concerns that the Spatial Strategy is too reliant on larger strategic sites and that a sufficient range of reasonable alternatives approaches, and site options have not considered or appraised
- Concerns over lack of evidence for and delivery of the Gypsy and Travellers and Travelling Showpeople requirements
- Broad support from the promoters of allocated sites with some requesting higher development capacities and larger site areas
- Many developers propose alternative development land and sites including within the Green Belt and Green Wedge
- Calls for the expansion of the North-East Chelmsford Garden Community site and clarity sought over why this option is rejected

- Broad support for other Strategic Policies including Delivering Economic Growth (Policy 8) and Connectivity and Travel (Policy S16)
- Concerns over existing infrastructure capacity constraints and the delivery of new infrastructure including transport, education and healthcare
- Some detailed wording changes proposed to expand, amend, clarify and update policies
- Some additional policy requirements proposed including supporting regional growth sector priorities (Policy S8)
- References to some other strategies, guidance and projects proposed including Thames Freeport (in Policy S9).

Site allocation policies for new development growth:

- Support expressed for many proposed site allocation policies
- Support for site allocations and development on brownfield land, but public opposition to removal of car parks to allow for development in Chelmsford Urban Area
- Significant levels of opposition to Hammonds Farm (SGS16a) and Junction 18 A12 Employment Area (SGS16b) for multiple reasons including traffic, landscape, flood risk and heritage impacts, with calls for their removal. There is also some limited support for these development proposals
- High level of objections to some other site allocations in particular Waltham Road Employment Area (GS9a), Land at Kingsgate, Bicknacre (GS11b) and Land West of Barbrook Way, Bicknacre (GS11c) for multiple reasons including traffic, landscape and flood risk impacts and calls for their removal
- Some detailed wording changes proposed to expand, amend, clarify and update site policies including in relation to active travel, green infrastructure, waste water, heritage and flood risk
- Broad support from the promoters of allocated sites with some requesting higher development capacities and larger site areas
- Many developers propose alternative development land and sites including within the Green Belt and Green Wedge
- Concerns over existing infrastructure capacity constraints and the delivery of new infrastructure including transport, education and healthcare
- Calls for changes to masterplans requirements for strategic sites and Special Policy Areas
- Requests for policy and boundary changes to some Special Policy Areas including ARU Writtle.

Development Management Policies:

- Broad support for many policies including biodiversity net gain (in Policy DM16) and net zero homes (in Policy DM31)
- Opposition from the development industry to some new policies and/or requirements including housing policies DM1 and DM2, sustainable buildings DM25 and DM16 and DM31
- Requests for clarifications, more detail, greater justification for and wording changes to many policies
- Essex County Council and Anglian Water Services recommend a more ambitious water efficiency standard in sustainable buildings (DM25)

- Some developers are seeking a more flexible approach to development within the Green Belt and Green Wedge
- Concerns over the evidence base to justify some new policy requirements, and how they will affect development viability and delivery including net zero homes (Policy DM31)
- Three new plan policies suggested – one from Natural England to address the cumulative increased recreational pressure on SSSIs and two from Essex County Council to mitigate overheating risk in new development, and to address embodied carbon emissions from new development.

Monitoring Framework:

- Some suggested additional monitoring indicators relating to Health Impact Assessments.

Policies Map:

- Suggested changes to some notations and designations including settlement boundaries, the Green Wedge and the Hammonds Farm site (SGS16a).

Consultation:

- Some criticism regarding the length of the consultation period and the process for making comments using the online portal.

How the comments have been used

The 'CCC response to the comments made' tables provide a high-level response to the main issues raised within the comments, explaining how they have been considered. A high-level overview of the main changes made to the plan in response to the preferred options consultation responses is provided below:

- Minor changes have been made to the Strategic Priorities, Vision and Spatial Principles
- Most Strategic Policies have been subject to limited changes – policies which have been subject to more substantive changes include S4, S9, S6 and S7
- Site allocation changes including the deletion of Kay Metzeler site, Brook Street (Site 1x) which is longer available for housing development, the deletion of Land west of 20 Back Lane, Ford End (Site 14a) as it is no longer considered suitable, the allocation of a new housing site at Andrews Place, West of Rainsford Lane (Site 1cc) which is being activity promoted for redevelopment in the plan period, and increasing the capacity of Meadows Shopping Centre allocation (Site 1w) in line with the recent submitted planning application and the assessment of representations submitted by the applicant
- Updated site allocation policies including new requirements, amended requirements and some deleted requirements
- Most Development Management Policies have been subject to limited changes – policies which have been subject to more substantive changes include DM1, DM2 and DM25
- Limited changes to the Draft Policies Map

- An updated and expanded glossary.

In addition to the preferred options comments, the Pre-Submission Local Plan has also been updated to:

- Provide greater clarification and consistency
- Respond to more recent discussions with Duty to Cooperate bodies about their Preferred Options responses and any changes sought
- Respond to more recent discussions with infrastructure providers about their services, such as education and healthcare
- Reflect the outputs of new evidence studies including an updated Infrastructure Delivery Plan, Strategic Housing Needs Assessment Addendum Report, Archaeology Assessment, Open Space Study Local Wildlife Sites Review
- Reflect more recent information and updates including the 2024 Annual Monitoring Report, April 2024 housing land supply data and the latest planning status of allocated sites
- Respond to more recent discussions with promoters about their sites identified in the Preferred Options Consultation Document
- Improve its effectiveness for decision making following feedback from Development Management colleagues, and
- Have regard to the housing numbers and transitional arrangements for the progression of Local Plans at an advanced stage of preparation set out in the revised NPPF December 2024.

Introduction

The Preferred Options consultation represented the second formal stage in the preparation of the Review of the Adopted Chelmsford Local Plan. The consultation document set out the preferred spatial strategy for new homes and jobs for the future growth and development of the city up to 2041. It also contained updated and new policies which would be used to determine planning applications. The consultation was undertaken in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

This consultation was preceded by an Issues and Options consultation carried out in 2022 and also undertaken in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Purpose of this 'You Said We Did' Report

This report sets out the consultation feedback received on the Preferred Options Consultation Document from a wide variety groups and individuals including residents, developers, landowners and their agents, businesses and statutory bodies such as other local authorities and Parish/Town Councils.

This report is constructed in four parts:

- Section 1 provides a summary of the public and stakeholder consultation undertaken
- Section 2 gives a summary of the representations received
- Section 3 provides a summary of how the Chelmsford Local Plan Pre-Submission (Regulation 19) Document (shortened to 'Pre-Submission Local Plan' throughout the rest of this document) has been informed by more recent evidence base studies (Section 3)
- Section 4 provides a summary of the main issues raised in the responses received and summary of how the Pre-Submission Local Plan has been informed by the responses. The report is set out in document order and therefore the policy numbers may not be in sequence.

This report supersedes the Preferred Options Feedback Report published in October 2024.

Section 1: Summary of Consultation Undertaken

A comprehensive six-week programme of consultation took place during the formal consultation period from 10am on Wednesday 8th May 2024 to 4pm on Wednesday 19th June 2024.

This programme of consultation followed (and exceeded) the requirements set out in legislation, and the commitments in the Council's adopted Statement of Community Involvement (September 2020).

The package of documents published on 8 May comprised:

- Preferred Options Local Plan Consultation Document; and
- Preferred Options Integrated Impact Assessment (subject of a separate Feedback Report); and
- Consultation Statement outlining full details about the consultation process.

This package of documents was placed on deposit at CCC Customer Service Centre, with electronic versions available to view at most Parish/Town Council offices and local libraries across Chelmsford.

The Council notified more than 2,800 contacts registered on its Consultation Portal. These included public, statutory agencies such as Essex County Council and Town/Parish Councils, utility companies, businesses, interest groups, and voluntary and community bodies. Council Members and staff were also notified.

A number of consultation events were arranged:

- Six staffed exhibitions, visited by 111 attendees
- 14 days of unstaffed exhibitions
- Four pop-up displays for the whole consultation period
- A bespoke Local Plan video, attracting 885 views
- An online virtual exhibition, visited by more than 455 views
- Officers also held targeted engagement including a Parish/Town Council Forum, Agent/Developers Forum and Local Authority Duty to Co-operate meeting.

Printed/online materials and advertisements were produced as follows:

- Web page with links to key materials including a Preferred Options Local Plan Tracked Changes May 2024 and the exhibition panels
- Advertisements in a local newspaper (Essex Chronicle)
- Six articles in City Life (CCC's online news website) and two in South Woodham Focus (independent community magazine)
- 24 social media posts
- Posters distributed to Parish/Town Councils, CCC offices and leisure facilities, post offices, doctors' surgeries, churches and local shops
- Summary newsletters widely available, in addition to being handed out at South Woodham Ferrers railway station
- 89 site notices placed around new potential site allocations
- Three GovDelivery mailshots to 12,000 recipients.

A list of organisations consulted, and copies of key consultation materials are given in Appendix 1.

Integrated Impact Assessment of the review of the Adopted Local Plan: Preferred Options Consultation

The Local Plan Integrated Impact Assessment (IIA) was also subject to consultation at the same time. The IIA brings various strands of assessment together, consisting of the Sustainability Appraisal, Strategic Environmental Assessment, Habitats Regulations Assessment, Health Impact Assessment, and Equalities Impact Assessment. Feedback on this document is summarised in a separate report prepared by the Council's IIA Consultants.

Call for Sites and SHELAA

In addition to the Local Plan and IIA consultations, the Council undertook a Call for Sites to identify available land for consideration for future development. Nine new submissions and nine amendments to existing sites were submitted through this process. All the sites have been assessed in the Strategy Housing and Employment Land Availability Assessment (SHELAA) Autumn 2024 Report.

Section 2: Summary of Representations

For this report, people and organisations who made a comment to the consultation are called ‘respondents’.

Methodology

Respondents had a choice of ways to make their comments, by:

- Answering questions included in a complete version of the consultation document published on the consultation portal
- Answering questions using a stand-alone online questionnaire published on the consultation portal
- Sending written comments in an e-mail
- Sending written comments by post.

The questionnaire mostly consisted of a main question with related questions seeking views and any information the Council may have missed, plus two monitoring questions.

Whichever method respondents used, all comments have been entered into the Council’s Consultation Portal. Where respondents did not state which paragraph/section/policy or site they were commenting on, officers have assigned responses to the most relevant part of the Local Plan, with miscellaneous responses being recorded against the Foreword.

Where a Yes/No preference was invited to a question (for example, ‘Do you agree with this section/policy/paragraph/table/figure?’ and ‘Are you a resident within the Chelmsford City Council area?’), these have been recorded only where the respondent stated their preference.

The questions for both online methods of response were identical and have been combined for this report.

A small number of representations were received after the consultation closed, by prior agreement with officers, these have been analysed and included in the figures in this report. In addition, a small number of representations were ‘inadmissible’ due to their content. In these cases, as far as possible, the main point of the representation has been recorded minus the offending remarks.

To ensure proper consideration of issues, respondents have been divided into types depending on their interface with the Council. Some fall into more than one category, so totals may exceed the overall number of respondents.

Similarly, some respondents made their comments via more than one method so the totals for how comments were made is greater than the total number of comments received.

The assessment of responses is high level and focuses on the main issues raised, rather than the number of representations to any individual question.

Overview of responses

A total of 10,418 comments were received to the consultation from 3,678 respondents.

These respondents are from a wide variety groups and individuals including residents, developers, landowners and their agents, businesses and statutory bodies such as other local authorities and Parish/Town Councils.

It should be noted that the numbers included under the 'Key statistics' sections in this feedback report, and the number of responses received to each question will not amount to the totals set out above as people did not have to answer every question.

Comments by respondent type:

Type of Respondent	Explanation	Number of Respondents
Duty to Co-operate (DTC) bodies	Key bodies consulted on strategic matters, including Essex County Council, adjoining local authorities, Historic England, Natural England, Environment Agency	17
Specific bodies/groups	Parish/Town Councils, utility bodies, health and transport consultees etc	40
General and Other bodies/groups	Voluntary groups, religious groups, housing providers, businesses etc	27
Developers/landowners	Landowners, promoters of land and their agents	99
Public	Individual members of the public	3495

How people made their comments:

Method of making comments	Number of Comments	Percentage
Online Consultation Portal	410	3.9%
E-mail	9877	94.8%
Letter	131	1.3%

A large number of representations were received by email from 'Say no to Hammonds Farm' - a coalition of Councillors from Boreham, Sandon, Danbury and Little Baddow Parish Councils, expressing opposition to new development at Strategic Growth Sites 16a Chelmsford East Garden Community and 16b Land Adjacent to A12 Junction 18 Employment Area.

All the comments received can be viewed in full on the Council's planning policy consultation portal.

When viewing the portal, you will see the list of recent consultation events. Events which are open for consultation show a green timeline and the word ‘open’. Those which are closed show a red timeline and the word ‘closed’.

To view comments, you need to:

- Choose the event you would like to view comments for
- Select 'learn more' to open the event page
- Click on the ‘what people say’ tab to display a list of all the comments.

You can read all comments, or sort by name or date we received them. Where additional information such as reports or maps were submitted with a comment, these are listed at the end of the comment in PDF format and can be viewed or downloaded.

Responses to Preferred Options consultation included in the complete version of the full document are prefixed PO24. Responses to the stand-alone questionnaire are prefixed POQ24. You can find out more about using the consultation portal in our guidance notes.

Monitoring Questions

Two optional monitoring questions were included in the consultation. This was to help us understand the reach of the consultation and inform future engagement activities.

Optional Monitoring Question	**Number of Responses**	**Yes**	**No**
OM1. Are you a resident within the Chelmsford City Council area?	193	104	89

If you answered yes, please select the settlement which you live in or near to:	**Number of Reps**
Bicknacre	23
Boreham	0
Broomfield	1
Chatham Green	0
Chelmsford Urban Area	7
Danbury	8
Downham	0
East Hanningfield	20
Edney Common	0
Ford End	15
Galleywood	0
Good Easter	0
Great Baddow	0
Great Leighs	3
Great Waltham	1
Highwood	0
Howe Green	0
Howe Street	0

Little Baddow	3
Little Waltham	0
Margaretting	0
Ramsden Heath	0
Rettendon Common	0
Rettendon Place	0
Roxwell	0
Runwell	0
Sandon	2
South Woodham Ferrers	3
Stock	0
West Hanningfield	0
Woodham Ferrers	0
Writtle	0
Other	12

Optional Monitoring Question OM2 How did you hear about the consultation?	**Percentage**
Direct notifications email/letter	59.3%
Chelmsford City Council website	27.1%
Social media	10.9%
Local Plan newsletter	4.5%
Parish Council website/newsletter	9.5%
Newspaper advert	0.5%
Poster	9.5%
Attended a Local Plan exhibition	1.8%
Word of mouth	8.6%
Other	1.4%

Note: The percentage total exceeds 100% as respondents were able to select more than one answer.

Section 3: How the evidence base has informed the Pre-Submission Local Plan

As well as comments to the previous rounds of consultation in 2022 and 2024, the Pre-Submission takes account of recently completed evidence base documents across a wide range of issues. These documents are summarised in the table below:

Document	Purpose	How it has informed the Pre-Submission Local Plan
Updated Viability Assessment 2024	Considers the cost and value changes since the 2023 Viability Update was conducted, proposed changes to the NPPF and Pre-Submission policy amendments, as well as the Preferred Options Infrastructure Delivery Plan costs to developers for strategic sites on viability, and whether it is necessary to fully update the viability evidence before submitting the Local Plan for examination.	The impact of changes in costs and values on the preferred set of policies in the Pre-Submission Local Plan documents, including sensitivity testing, are broadly like those presented in the 2023 Local Plan Viability Update. Review mechanism text included in Policy DM2 to take account of sensitivities to changes in costs and values over the plan period.
Strategic Housing Needs Assessment Addendum Report 2024	Partially updates the 2023 Strategic Housing Needs Assessment (SHNA) to review the implications of moving from housing delivery up to a figure of 1,206 dwellings per annum over the plan period. Whilst updating the analysis for a new housing number, the report also updates other aspects of the SHNA where new data exists.	Increased affordable housing need has been reported in Policy DM2 and resultant clarification on the requirements for affordable private rent dwellings added. Findings on the demand for discounted market housing updated in the Reasoned Justification for Policy DM2. Updated demand for Specialist Residential Accommodation for older people supporting new requirement for older persons market housing on greenfield sites of more than 500 dwellings in Policy DM1.
Preferred Options Infrastructure Delivery Plan 2024	Sets out the infrastructure requirements of the Spatial Strategy incorporating findings from the Stage 1 baseline infrastructure	Estimate costs have been incorporated in the Updated Viability Assessment where appropriate. Infrastructure requirements have been aligned with sites specific policy requirements.

Document	Purpose	How it has informed the Pre-Submission Local Plan
	capacity analysis and providing further analysis showing planned projects across the administrative area of the Council. Appendix A and B record all identified project requirements, including the infrastructure type, location, delivery mechanism, cost, and funding gap based on the Preferred Spatial Strategy.	
Strategic Housing and Employment Land Availability Assessment (SHELAA) Autumn 2024	Provides a high-level assessment of promoted sites using criteria developed from National and Local Plan policy.	The assessment enables Officers to identify site characteristics, highlight site strengths and potential constraints, and establish likeliness of developability or deliverability of promoted sites. It does not allocate sites for development but is a starting point for reviewing sites against the promoted Spatial Strategy alongside other evidence base documents/considerations.
Gypsy and Traveller Accommodation Assessment (GTAA) 2024	Provides an assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in Chelmsford City Council area.	The assessment, together with other evidence base documents, informs the allocation of Pitches and Plots for Gypsy and Travellers that meet the definition of Gypsies and Travellers used in the Planning Policy for Travellers Sites in Strategic Policy S6. It also informs the criteria-based considerations in Policy DM3 and well as the approach to Specialist Residential Accommodation in Policy DM1Cii.
Employment Land Review – Focused Update 2024	A provide updated economic evidence specifically to inform the approach to economic growth and employment	The updated employment floorspace requirement forecasts have informed Strategic Policy S6.

Document	Purpose	How it has informed the Pre-Submission Local Plan
	land policies within the Pre-Submission Local Plan. It draws on the most up-to-date assumptions and data regarding future economic growth prospects for Chelmsford between 2022 and 2041.	
Addendum to Heritage Assessment 2024	A report providing a brief assessment of the setting of designated and non-designated heritage assets within or in the vicinity of a new development site under consideration for the Pre-Submission Local Plan, i.e. Andrews Place to the west of the City Centre.	The report identifies any designated and non-designated heritage assets within or in the vicinity of new housing site allocation Andrews Place (Growth Site Policy 1cc) and has been used to inform the site policy in the plan.
Updated Indoor and Outdoor Sports Assessment and Strategy 2024	Assesses the indoor and outdoor sports provision within the City Council's area and provides a framework for the prioritisation, provision and development of sports facilities across the public, private and independent sectors. It covers all formal playing pitch and outdoor sport facilities across the authority area to strategically plan for the future.	Has been used to inform requirements relating to on and off-site sports provision in the IDP.
Open Space Assessment 2024	Audit of Open Space within the City Council's area to inform the provision of accessible, high quality, sustainable provision for open spaces.	Has been used to inform and update Open Space notations on the Policies Map, as well as setting standards for Open Space requirements for new development.
Air Quality Assessment 2024	This provides an assessment of the air quality impact of the draft Local Plan.	Overall, the assessment concludes that the impact of the Local Plan in 2041 can be considered negligible for all pollutants.

Document	Purpose	How it has informed the Pre-Submission Local Plan
Archaeology Assessment 2024	A high-level assessment of archaeological impact of the proposed new site allocations. The report defines the heritage significance of (archaeological) designated and non-designated heritage assets which may be impacted by development proposals.	The report identifies where specific archaeological work is required for future planning applications and where archaeological work may be required pre or post determination. The conclusions of the report have informed relevant Local Plan policies including Policy S3 and Policy DM15. In addition, where mitigation measures are identified this has informed relevant site allocation policies such as Growth Site Policy 9a, Strategic Growth Site Policy 16a and Strategic Growth Site 16b.
Local Wildlife Sites Review 2024	A review of designated Local Wildlife Sites (LOWS) in the vicinity of proposed new site allocations forming part of the Local Plan Review.	The study supports LOWS defined on the Draft Policies. The changes include some new LOWS, deleted LOWS and amendments to LOWS boundaries.
Strategic Flood Risk Assessment (SFRA) Level 2 – new and updated Site Summary Tables and mapping	The SFRA provides a comprehensive and robust evidence based on flood risk issues to support the plan review. It assesses land promoted for potential development, changes to the proposed development sites within the city, and changes in national planning policy and guidance. It also builds on identified risks from the Level 1 assessment for proposed development sites, to provide a greater understanding of fluvial, surface water, groundwater, and reservoir related flooding	The new and updated information has been used to inform decisions on the location of future development and flood risk policies, reflecting the implications of the August 2022 changes to the Planning Practice Guidance. They have also informed site allocation boundaries on the Policies Map for the Pre-Submission Local Plan and the Sequential and Exception Test Focused Update (see below).

Document	Purpose	How it has informed the Pre-Submission Local Plan
	risks for sites most at risk.	
Sequential and Exception Test Focused Update, 2024	The report provides updates to the Flood Sequential and Exception tests undertaken to inform the Pre-Submission Local Plan. It should be read alongside the report CC012: Sequential and Exception Tests of Preferred Options Site Allocations, May 2024.	The focused update has been used to inform decisions on the location of future development and flood risk implications which may need to be considered during development of the site. These updates reflect the updates made through the Level 2 SFRA and includes updates to the site allocations for Growth Sites 17a, SGS1cc and SGS16a.
Small Sites Planning Briefs/Concept Frameworks, 2024	This document details the constraints and opportunities of the five new small housing sites allocated in Ford End, Bicknacre and East Hanningfield.	The report supports and informs the site allocation policies (Growth Sites 11b, 11c, 14b, 17a and 17b) and identifies suitable site boundaries shown on the Draft Policies Map.
Preferred Options IIA, 2024	The IIA is a detailed technical document, which assessed the Preferred Options Local Plan proposals and policies against a set of assessment objectives to	The Preferred Options IIA includes recommendations which have been considered as part of the Pre-Submission plan. This includes amendments to policies S2, S4 and DM15.

Document	Purpose	How it has informed the Pre-Submission Local Plan
	identify any significant effects and recommend measures to mitigate these effects and enhance the positive effects.	
Pre-Submission IIA, 2024	The IIA is an iterative process, which has assessed the Pre-Submission Local Plan proposals and policies against the same assessment objectives as the Preferred Options version, to identify any further significant effects and recommend measures to mitigate these effects and enhance the positive effects.	The Pre-Submission IIA includes recommendations which have been considered as part of the Pre-Submission plan. This includes amendments to policies S2, S4 and DM15.
Transport impact appraisal Of Local Plan Review Pre-Submission (2024)	Assesses the impact the development proposed in the Pre-Submission Local Plan will have on the road network. This is a strategic assessment appropriate for a Local Plan.	Concludes that by maximising the potential for sustainable accessibility to and from the sites along the A12 corridor, the impact on the strategic highway network should not be considered severe.
Local Neighbourhood Centres 2024	Describes the approach to defining the Local Neighbourhood Centres boundaries on the Pre-Submission Local Plan Draft Policies Map.	Retail frontages for Local Neighbourhood Centres are currently identified on the adopted Local Plan Policies Map. There has since been a shift in national policy away from defining retail frontages. The report supports the Local Neighbourhood Centres boundaries on the Draft Policies Map.
Essex Open Legal Advice – Energy Policy and Building Regulations (February 2024)	Considers the ability of local planning authorities to set local plan policies that require development to achieve energy efficient standards above Building Regulations.	Supports Local Authorities having statutory powers to set planning policies which require energy efficiency standards that are better than Building Regulations as long as these are evidenced and justified, and policies can be expressed using energy

Document	Purpose	How it has informed the Pre-Submission Local Plan
		metrics if they are supported by an evidence base that justifies their viability. This supports the approach taken in Policy DM31.
Essex Net Zero Policy – Technical Evidence Base (July 2023)	Provides the technical evidence to support the specific policy requirements identified to ensure that new development in Essex in built to net zero carbon in operation.	This evidence advances the high-level Essex Net Zero Carbon Viability and Toolkit Study (August 2022) and has informed the CCC Viability testing and demonstrates that the requirements of Policy DM31 are viable for developments within CCC. This supports the approach taken in Policy DM31.
Essex Net Zero Specification Guidance (July 2024)	Provides technical information to support the delivery of Essex Net Zero development with consistent planning policy approach towards reducing carbon emissions from new development in Essex.	Supports the requirements in Policy DM31.

All the plan evidence base is available online via Local Plan Review.

Section 4: Main Issues Raised in Consultation Responses and high-level summary of how they have informed the Pre-Submission Local Plan

A brief overview of the content of each section of the consultation document is set out below. This is followed by a summary of the feedback received by section. After that, a table is provided which provides a high-level summary of CCC's response to the consultation comments made and how they have been used to inform the Pre-Submission Local Plan.

We have specified who has made comments from public sector bodies, infrastructure or service providers and developers/landowners in brackets at the end of relevant bullet points in the feedback received text. This is because it is useful to understand the nature of respondents, particularly where a stakeholder has a legal duty or responsibility over a matter that they are making comments about. We have not specified who has made comments from members of the public as to do so would result in a very long report, so bullet points from the public do not a have brackets. It should be noted that in some cases, members of the public raised similar points to stakeholders. This is especially the case in relation to comments made by Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group to Strategic Growth Sites 16a (Hammonds Farm) and 16b (Junction 18 of the A12) which have been replicated and amplified by many individuals. To avoid duplication, these comments have not been repeated in the public comments. However, this does not affect the consultation process as this report focuses on the main issues received rather than the number of representations to any individual section of the plan.

The 'CCC response to the comments made' table provide a high-level summary on how the main issues raised in the responses have been used to inform the Pre-Submission Local Plan. This includes details of the key changes made and suggestions not taken forward and why.

A high-level overview of the main changes made to the plan in response to the preferred options consultation responses is provided below:

- Minor changes have been made to the Strategic Priorities, Vision and Spatial Principles
- Most Strategic Policies have been subject to limited changes – policies which have been subject to more substantive changes include S4, S9, S6 and S7
- Site allocation changes including the deletion of Kay Metzeler site, Brook Street (Site 1x) which is longer available for housing development, the deletion of Land west of 20 Back Lane, Ford End (Site 14a) as it is no longer considered suitable, the allocation of a new housing site at Andrews Place, West of Rainsford Lane (Site 1cc) which is being activity promoted for redevelopment in the plan period, and increasing the capacity of Meadows Shopping Centre allocation (Site 1w) in line with the recent submitted planning application and the assessment of representations submitted by the applicant
- Updated site allocation policies including new requirements, amended requirements and some deleted requirements

- Most Development Management Policies have been subject to limited changes – policies which have been subject to more substantive changes include DM1, DM2 and DM25
- Limited changes to the Draft Policies Map
- An updated and expanded glossary.

In addition to the preferred options comments, the Pre-Submission Local Plan has also been updated to:

- Provide greater clarification and consistency
- Respond to more recent discussions with Duty to Cooperate bodies about their Preferred Options responses and the changes sought
- Respond to more recent discussions with infrastructure providers about their services, such as education and healthcare
- Reflect the outputs of new evidence studies including an updated Infrastructure Delivery Plan, updated Strategic Housing Needs Assessment, Archaeology Assessment, Open Space Study and Local Wildlife Sites Review
- Reflect more recent information and updates including the 2024 Annual Monitoring Report, April 2024 housing land supply data and the latest planning status of allocated sites
- Respond to more recent discussions with promoters about their sites identified in the Preferred Options Consultation Document
- Improve its effectiveness for decision making following feedback from Development Management colleagues, and
- Have regard to the housing numbers and transitional arrangements for the progression of Local Plans at an advanced stage of preparation set out in the revised NPPF December 2024.

It is important to note that the report does not summarise all the representations received or identify every individual issue. The ‘CCC response to the comments made’ table also does not provide a response to each individual comment.

CCC responses to site allocation consultation comments appear under the relevant specific site policy.

The Council commissioned Essex Highways to review and consider the key issues raised in the highway and transportation responses received to the consultation. This report entitled Preferred Spatial Approach - Response to Representations (November 2024) is given in Appendix 2 and includes a review of the Transport Technical Note, prepared by Stomor (June 2024) on behalf of Little Baddow, Danbury, Boreham and Sandon Parish Councils. The Preferred Spatial Approach - Response to Representations (November 2024) report has been used by CCC to understand and respond to matters of concern raised in this You Said We Did report and to inform the Pre-Submission Local Plan.

It is important to note that all comments received to the preferred options consultation have been reviewed and are noted. Overall, all support for the plan is welcomed. Objections/concerns raised are also acknowledged including the significant and high level of opposition to some sites including Hammonds Farm (SGS16a), Junction 18 A12 Employment Area (SGS16b) and Land West of Barbrook Way, Bicknacre (GS11c). To avoid duplication support for and objections to the plan have not been stated in the 'CCC response to the comments made' under each policy/section.

All the comments received can be viewed in full on the Council's planning policy consultation portal.

Key statistics are included at the top of each section. Where relevant these include the number of yes/no responses and the number of written comments received to.

Foreword

This section of the consultation document provides a foreword from the Leader of the Council. Miscellaneous comments that do not relate to a specific or obvious section of the consultation document have been summarised here.

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Foreword	3	0	3	3

Summary of Representations – main issues and suggested changes:

- Supportive of focus on climate action in response to the Council's declared climate and ecological emergency in 2019 and proposed work towards reaching net zero by 2030 (CNG Fuels)
- Supportive of the spatial strategy and policy approach to climate change and the multifunctional benefits of green and blue infrastructure. Some limitations which need to be addressed within the Local Plan regarding sustainable and resilient growth and infrastructure capacity. In terms of locating growth where there is headroom to accept and treat additional flows at our water recycling centres within existing permits, and where new infrastructure is provided, the quantum of growth means carbon efficiencies can be achieved. Ongoing engagement will continue (Anglian Water)
- Add reference to a new sports stadium to be an aspiration and supported in principle within the Local Plan. Current Melbourne Park venue, used primarily by the Athletics Centre and Football Club, is not ideal as a shared facility for either sport.

CCC response to the comments made
Strategic Priority 1 has been amended to promote carbon resilience.
Requirements for developments to provide sufficient wastewater treatment capacity have been strengthened in the plan, for example, site policies 7a-c.
There are no proposals in the Local Plan for a new sports stadium.

Sustainability is at the heart of the Pre-Submission Local Plan.

Introduction

This section of the consultation document describes the consultation document and key information about the review process.

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Introduction	4	4	40	40

Summary of Representations – main issues and suggested changes:

- Document needs to be re-ordered in policy sequence and is too long and repetitive
- Several obstacles in the way for residents to respond including that the portal is overly complicated and a short consultation period
- Papers published one week before the Policy Board meeting did not give adequate time to review
- Consultation deadline should have been extended to allow for additional meetings following announcement of the General Election (Great Baddow Parish Council)
- Welcome continued engagement with CCC in relation to the authorities' respective local plan preparation (Southend-on-Sea City Council)
- Support the allocation of sites for Gypsy, Traveller and Travelling Showpeople housing needs (Basildon Borough Council)
- Development in Growth Area 3 could impact on the need for infrastructure within Basildon Borough. Regular Duty to Co-operate meetings requested to ensure that any emerging cross boundary issues are fully discussed and addressed (Basildon Borough Council)
- Cumulative traffic impacts could occur, especially along the A130 and A1245 towards the Fairglen interchange and the A12 towards J28 of the M25. Encourage collaboration with the local Highway Authority and National Highways to identify potential road network impacts for the IDP and plan policies (Rochford District Council, Brentwood Borough Council)
- Support the proposed Strategic Priorities and policies and recommend Statement of Common Grounds at the appropriate stage (Rochford District Council, Brentwood Borough Council)
- Chelmsford has engaged with us through the Duty to Co-operate, we are content with the contents and accuracy of the plan and satisfied it would be in general conformity with the basic conditions (Braintree District Council)
- Two cross boundary issues not adequately reflected in the plan are sustainable connectivity with South Essex and Thames Freeport. This requires joint working between South Essex authorities through SEC, CCC and ECC (Castle Point Council)

- Amend para. 1.35 to clarify that ECC is not required to be consulted on all non-mineral related development proposed within Safeguarded Areas (Essex County Council)
- Amend para. 1.39 to clarify that ECC is not required to be consulted on all non-waste related development proposed within Waste Consultation Areas (Essex County Council)
- Amend para. 1.42 to refer to ECC documents required to be submitted with planning applications and update the Council's Local Validation List to list these (Essex County Council)
- Non-Technical summary appears missing from the HRA (Natural England)
- Plan should draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups (Historic England)
- Work with your neighbours including London to ascertain whether any unmet needs will arise which will impact on the demand for new homes in Chelmsford (Home Builders Federation)
- Evidence base documents will require updating to reflect the change in circumstances, such as landscape, sustainable accessibility mapping, further IIA work and Infrastructure and Viability Report (Gladman Development Ltd)
- Refer to the South East Marine Plan remit which ranges from Mean High Water Springs (MHWS) or the tidal limit out to the territorial limit (Marine Management Organisation)
- The Chelmer Valley landscape is of great interest, and, through its association with Baker's writing, it can now also be regarded as nationally significant cultural landscape (Chelmer Valley Landscape Group)
- Continue to engage with the NHS and ICB on the Infrastructure Delivery Plan (IDP). Appropriate healthcare costs should be factored into the Local Plan Viability Assessment for relevant typologies (NHS Property Services Ltd)
- More needed on sustainability and reducing litter/waste
- More services/facilities should be provided in the town centre for youth groups.

CCC response to the comments made
The plan policies are shown in the order they would appear in the final plan and will be renumbered in later versions.
The consultation exceeded requirements set out in legislation and the Council's Statement of Community Involvement.
The Committee papers were published in line with Council policy.
Request for continued Duty to Cooperate engagement is welcomed.
Reasoned Justification amended to include the Thames Freeport cross-boundary issue.
Reasoned Justification amended to clarify that ECC is not required to be consulted on all non-mineral related development proposed within Safeguarded Areas or all non-waste related development proposed within Waste Consultation Areas.
Reasoned Justification amended to refer to ECC documents required to be submitted with planning applications.
Reasoned Justification amended to clarify the remit of the South East Marine Plan and to refer to marine licences.
As Non-Technical Summary has not been produced for the HRA as it is an inherently technical report aimed at a technical audience, and there is no

requirement for it in the legislation. However, an executive summary has been produced.
The Pre-Submission Local Plan and evidence base has been informed by engagement with Duty-to-Cooperate bodies including service providers through the updated Infrastructure Delivery Plan.
Measures to reduce the impact of development on the Chelmer Valley landscape are set out in the updated East Chelmsford Garden Community Site Policy 16a.
Sustainability is at the heart of the Pre-Submission Local Plan.

About Chelmsford

This section of the consultation document sets out the key challenges and opportunities to address over the plan period to 2041.

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
About Chelmsford	6	1	12	12

Summary of Representations – main issues and suggested changes:

- The Great Eastern mainline rail route (GEML), Elizabeth line and A12 provide key strategic transport links and important commuting flows in both directions. (Transport for London)
- New green and blue infrastructure should accord with our Green Infrastructure Framework - Principles and Standards for England. Add references to protecting and enhancing the natural environment (Natural England)
- Reference the Essex Local Nature Recovery Strategy in paras 2.38, 2-39, 2.42 (Natural England)
- Where relevant there should be linkages with the Biodiversity Action Plan, Local Nature Partnership, Rights of Way Improvement Plans, Green Infrastructure Strategies and Nature Recovery Network (Natural England)
- Amend para. 2.14 to (i) add a reference the growing population of people with disabilities (ii) clarify that the growing and ageing population also covers Chelmsford as part of Central Essex and (iii) to add additional references to sustainable transport opportunities (Essex County Council)
- Amend Figure 6 and para. 2.23 to refer to the Great Eastern Mainline connections to Colchester, Ipswich and Norwich (Essex County Council)
- Comment from landowner/developer suggesting that their proposed development site will accord with the preferred plan/spatial strategy (Saxtons 4x4)
- Support key strategic objectives of the authorities to provide sufficient new homes (Mrs Mary Rance)
- Supportive of the Council key objectives
- Figure 15 misrepresents the size of the distance SWF is from The Dengie
- Urban area should be the focus for any new development.

CCC response to the comments made

Reference added to the Essex Local Nature Recovery Strategy in the Reasoned Justification.
No change to the Reasoned Justification in respect of strategic objectives of North and Central Essex authorities as this has previously been agreed between the Councils and cannot be altered unilaterally by CCC.
Amendments made to Figure 6 and transport section to refer to the Great Eastern Mainline connections to Colchester, Ipswich and Norwich.
Amendments made to regional context section to include reference to South Essex and Thames Freeport.
Figures updated to include latest data and provide clarity.

What are our Strategic Priorities

This section of the consultation document sets out the Strategic Priorities which are the key priorities that the Local Plan is based on.

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
What are our Strategic Priorities	20	11	50	50

Main issues are listed under the Strategic Priority they relate to. The abbreviations in the sub-headings below relate to the Strategic Priorities as follows:

SP1	Strategic Priority 1	Addressing the Climate and Ecological Emergency
SP2	Strategic Priority 2	Promoting smart, active travel and sustainable transport
SP3	Strategic Priority 3	Protecting and enhancing the natural and historic environment, and support for an increase in biodiversity and ecological networks
SP4	Strategic Priority 4	Ensuring sustainable patterns of development and protecting the Green Belt
SP5	Strategic Priority 5	Meeting the needs for new homes
SP6	Strategic Priority 6	Fostering growth and investment and providing new jobs
SP7	Strategic Priority 7	Creating well designed and attractive places, and promoting the health and social wellbeing of communities
SP8	Strategic Priority 8	Delivering new and improved infrastructure to support growth
SP9	Strategic Priority 9	Encouraging resilience in retail, leisure, commercial and cultural development

SP1

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Southend-on-Sea City Council, Rochford District Council, Chignal Parish Council, North Chelmsford Villages

Community Group, Anglian Water Services Ltd, Sport England, Rosehart Properties, Hammonds Estates and Wates Developments, CNG Fuels, Dominus Chelmsford Ltd, Croudace Homes)

- Support the increased emphasis on addressing climate change and sequence of priorities (Broomfield Parish Council)
- Add emphasis on climate resilience, particularly in terms of flood risk management and move reference to the 10-year tree planting campaign under priority 3 (Anglian Water Services Ltd)
- Add reference to the Essex Local Nature Recovery Strategy in combating climate change, the role of nature-based solutions and the whole catchment approach to managing water resources (Natural England)
- Add reference to the remit of the South East Marine Plan remit and requirement of a marine licence (Marine Management Organisation)
- Support priority but it will not be achieved through housing allocations beyond the Green Belt away from the city. Undertake a Green Belt Review to identify more sustainable development options (Vistry Group)
- Plan does not have sufficient regard to the Council's wider corporate responsibilities including the aims of the Waterways Working Group (Vistry Group)
- The requirement for net zero development must be considered in terms of overall impact on development viability as the Local Plan continues (Dandara Eastern, Dandara) and align with national policies and regulations (Higgins Group, Hill Residential).

SP2

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Essex County Council, Sport England, Rochford District Council, Chignal Parish Council, North Chelmsford Villages Community Group, Rosehart Properties, Hammonds Estates and Wates Developments, CNG Fuels, Dominus Chelmsford Ltd, Croudace Homes)
- Amend para. 3.6 to refer to ECC's Safer Greener Healthier campaign (Essex County Council)
- Hammonds Farm is not the most sustainable location with regards to transport connections and facilities available within the immediate community and does not fully accord with this priority (Dandara Eastern)
- Plan should prioritise development to areas which are already in sustainable well-connected locations (Dandar, Obsidian Strategic, Hill Residential) and avoid isolated development proposals (Higgins Group)
- Priorities should support opportunities to enhance the sustainability of existing service villages in line with the NPPF
- Support for promoting and encouraging active and sustainable travel but need to overcome barriers e.g., badly maintained pavements, pavement parking and scooting, bike thefts, poor and costly bus services
- Support expressed from public.

SP3

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Rochford District Council, Chignal Parish Council, Environment Agency, North Chelmsford Villages Community Group, Rosehart Properties, Hammonds Estates and Wates Developments, Dandara, Hill Residential, Dominus Chelmsford Ltd, Croudace Homes)
- Ensure the plan is underpinned by up-to-date environmental evidence including local ecological networks and Local Biodiversity Action Plans. Explore opportunities for development to enhance ecological networks and ensure development decisions consider impact on soils. CCC is referred to various advice and guidance for more information (Natural England).

SP4

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Rochford District Council, Essex County Council, Writtle Parish Council, Chignal Parish Council, North Chelmsford Villages Community Group, Hammonds Estates and Wates Developments, Dominus Chelmsford Ltd, Croudace Homes)
- Revise to refer to re-using suitable excavated materials and the following guidance 'The Definition of Waste: Development Industry Code of Practice; and The Waste Management' (Environment Agency)
- Amend para. 3.22 to be consistent with the NPPF e.g., to refer to practical and environmentally feasible prior extraction (Essex County Council)
- Include reference to directing new development to locations close to existing or proposed local facilities, so that people can walk, cycle or use public transport and be less reliant on the car (Richborough)
- Move reference to 'protecting the Green Belt' into priority 3 (Broomfield Parish Council)
- Insufficient evidence available to support approach that exceptional circumstances do not exist to review Green Belt boundaries (Rosehart Properties)
- A Green Belt review is required to identify suitable development areas currently within the Green Belt and to provide a more balanced/sustainable Spatial Strategy (Vistry Group, Whirledge & Nott, Higgins Group, Croudace Homes, Hill Residential)
- Should assess opportunities for sustainable development in the Green Belt
- Ignoring the Green Belt skews development to areas which have already experienced significant growth.

SP5

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Rochford District Council, Essex County Council, Chignal Parish Council, North Chelmsford Villages Community Group, Rosehart Properties, Hammonds Estates and Wates Developments, Dandara, Higgins Group, Hill Residential, Dominus Chelmsford Ltd, Croudace Homes)
- Amend para. 3.24 to be consistent with the Strategic Housing Needs Assessment (SHNA) to refer to the significant demand for affordable housing, particularly rented affordable (Essex County Council)
- Add reference to meeting qualitative and quantitative housing needs in full in line with the NPPF (Richborough)
- Strengthen by referring to providing homes for those of working age to support the local economy (Hammonds Estates and Wates Developments)
- Strengthen ambition to meet the range of housing needs in full and make clear that growth is supported outside of Chelmsford (Obsidian Strategic Asset Management Ltd)
- Support expressed from public.

SP6

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Rochford District Council, Chignal Parish Council, North Chelmsford Villages Community Group, Rosehart Properties, Hammonds Estates and Wates Developments, CNG Fuels, Dominus Chelmsford Ltd, Croudace Homes).

SP7

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Rochford District Council, Chignal Parish Council, North Chelmsford Villages Community Group, Sport England, Rosehart Properties, Hammonds Estates and Wates Developments, Dominus Chelmsford Ltd)
- Insufficient consideration is being given to the health benefits of and creation of Public Rights of Way (PROWs) and bridleways (Essex Bridleway Association)
- Add that the built environment should prioritise safety, particularly for young women and girls, to create a more inclusive environment. Add reference to stewardship to reflect the Garden Community allocations (Hammonds Estates and Wates Developments, Croudace Homes).

SP8

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Rochford District Council, Chignal Parish Council, Essex County Council, Environment Agency, North Chelmsford Villages Community Group, Sport England, Anglian Water

Services Ltd, Rosehart Properties, Hammonds Estates and Wates Developments, Dominus Chelmsford Ltd, Croudace Homes)

- Amend para.3.39 to provide reassurance that the Preferred Option represents the best option in transport terms (Essex County Council)
- Add reference to support the shift to a low carbon community, prevent worsening congestion and encourage a variety of modes of travel behaviours (Hammonds Estates and Wates Developments)
- Include references to facilities and police, ambulance and fire and rescue (Essex Police)
- Support reference to service providers within this priority (Hill Residential)
- Expand para. 3.37 to refer to a sufficient rolling supply of employment land, meeting local and wide strategic needs and allocating new employment areas (Greystoke GB)
- The Spatial Strategy focuses pressure on existing infrastructure to a few limited locations. Exceptional reasons exist to justify a Green Belt review to identify sustainable Green Belt development locations (Whirledge & Nott, Croudace Homes)
- Traffic modelling needs to provide evidence that the A132 and B1012 has been modelled to include all the traffic from the Dengie to 2041.

SP9

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Rochford District Council, Chignal Parish Council, North Chelmsford Villages Community Group, Rosehart Properties, Hammonds Estates and Wates Developments, Dominus Chelmsford Ltd)
- The Council's Plan for Improving Rivers and Waterways should have a greater prominence given that significant change is planned to the River Chelmer during the plan period (Hammonds Estates and Wates Developments, Croudace Homes)
- Include actions to repair and increase the sea wall height around SWF by 2041.

Other

Summary of Representations – main issues and suggested changes:

- The three priority groupings (climate, growth and place) effectively balance the demands of the planning system and provide coherent plan priorities (Basildon Borough Council)
- Add additional priority to pursue opportunities to enhance the sustainability of existing service villages to prevent them from stagnating (Croudace Homes)
- Plan policies and site allocations are not based on accurate evidence or NPPF complaint (Vishal Sharma PO24-9579).

CCC response to the comments made

The Council can meet its development requirements without needing to undertake a Green Belt review. This approach accords with National Planning Guidance.
Table of the propriety groupings has been added for clarity.
SP1 – Supporting text amended to include the need for resilience to climate change, nature based mitigation solutions and tree planting, and reference to the Essex Local Nature Recovery Strategy.
SP2 – Supporting text amended to include reference to ECC's Safer, Greener, Healthier campaign.
SP3 – Supporting text amended to include reference to Natural England's Green Infrastructure Framework.
SP4 – Supporting text updated to include reference to the Waste Development Industry Code of Practice (DoWCoP); and clarification on prior extraction of minerals.
SP5 – Supporting text amended to include rented affordable housing.
SP7 – Built environment safety and stewardship matters are covered by SP6, Policy DM24 and Garden Community site policies SGS6 and SGS16.
SP8 – Supporting text adjusted to refer to facilities alongside infrastructure, and to police, ambulance and fire and rescue.
SP9 – already refers to the Council's Plan for Improving Rivers and Waterways – no further reference is considered necessary.

Our Vision and Spatial Principles

This section of the consultation document describes the long-term Vision and Spatial Principles for managing and accommodating growth within Chelmsford up to 2041 and beyond.

Vision for Chelmsford

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Vision for Chelmsford	7	5	21	21

Summary of Representations – main issues and suggested changes:

- Support (Essex County Council, Anglian Water, Broomfield Parish Council, Chignal Parish Council, North Chelmsford Villages Community Group, Dandara, Basildon Borough Council, Dominus Chelmsford Limited, CNG Fuels Limited, Sport England, Wates Developments and Hammonds Estates LLP)
- Avoid repetition by translating into a broader statement around sustainable growth and addressing the climate and ecological emergency (Anglian Water)
- Add two additional bullet points to celebrate, conserve and enhance the City's rural hinterland, and to maximise the opportunities of the countryside for healthy leisure activities, tranquillity and wellbeing (Broomfield Parish Council)
- Expand to encompass providing better village bus services and improving the safety of rural roads to encourage cycling and walking. Rural employment

sites should be accessible by sustainable means of transport (Chignal Parish Council)

- Expand to support our vibrant urban centres and very rural areas. Add new bullet on the health benefits of environmental tranquillity (North Chelmsford Villages Community Group)
- Explain how the bullet points relate to the vision and strategic priorities and will be used in future decision making (Hill Residential Ltd, Higgins Group, Dandara)
- Include reference to Green Belt (Higgins Group)
- Expand to refer to guiding growth towards a more sustainable community (Rosehart Properties Ltd, Croudace Homes)
- Amend to support opportunities to decarbonise the HGV sector (CNG Fuels Limited)
- Hammonds Farm is separated from the City by the A12 and contrary to the Vision. There are also questions over its deliverability (Dandara Eastern)
- Expand bullet 2 to support the logistics sector (Greystoke CB)
- The plan vision and our vision for Hammonds Farm strongly align. Enhance by referring to safety in bullet 10, the creation of new forms of connectivity in bullet 5, and by clarifying what is meant by modal shift (Wates Developments and Hammonds Estates LLP)
- Expand bullet 9 to refer to multifunctional green/blue infrastructure (Essex County Council)
- Expand bullet 9 to include reference to police facilities (Essex Police)
- Add new bullet to deliver Biodiversity Net Gain and wider environmental net gains, that forms an important component of nature recovery (Essex County Council)
- Do not support. Vision should acknowledge that development needs are to be met in full, including for housing (Richborough, Obsidian Strategic Asset Management)
- Various comments from landowners/developers suggesting that their proposed development sites will accord with the preferred Vision.

CCC response to the comments made
Brief explanation added of how the bullet points relate to the Vision.
Protection of the Green Belt is addressed by Strategic Policy S1.
Reference added to facilities alongside infrastructure relating to police, ambulance and fire and rescue.
Safety, the creation of new forms of connectivity, modal shift and Biodiversity Net Gain are adequately addressed elsewhere in the Plan.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.

Spatial Principles

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Policy S1 - Spatial Principles	27	11	59	59

Summary of Representations – main issues and suggested changes:

- Support expressed (Essex County Council, Anglian Water, Chelmer Housing Partnership (CHP), Cliffords Group Ltd, Tritton Farming Partnership LLP, Cliffords Group Ltd, Dominus Chelmsford Limited, Dandara Eastern, Wates Developments and Hammonds Estates LLP, Mr J Bolingbroke, Bloor Homes (Eastern), C J H Farming Ltd, Chignal Parish Council, Miscoe Enterprises Ltd, Tritton Farming Partnership LLP, Dandara Eastern, This Land, Hill Farm (Chelmsford) Ltd, A.G. & P.W.H Speakman, The Bucknell Family, Crest Nicholson, Dandara, Richborough, Pigeon (Sandon) Ltd, Daniel James Developments, Chris & Helen Copping, Martin Grant Homes)
- Support all except e. The settlement hierarchy is not a robust basis for identifying sustainable development locations. Amend to enable settlements outside the Green Belt to protect or create local services through targeted development, where appropriate (Broomfield Parish Council)
- Part c - Brownfield land may have high value for invertebrates and ecological surveys should be carried out to inform allocations and planning decisions (Natural England)
- Providing housing should be given more prominence and weight in the plan (Chelmer Housing Partnership (CHP))
- Disagree/concern expressed to part b. A Green Belt review is required to identify sustainable development opportunities in the Green Belt (Hill Residential Ltd, Higgins Group, Vistry Group, Whirledge & Nott, Croudace Homes, Martin Grant Homes)
- Include reference to the presumption in favour of sustainable development (Martin Grant Homes)
- Amend e to include identifying sustainable growth opportunities within the Green Belt which respect the development pattern and settlement hierarchy (Whirledge & Nott, Croudace Homes)
- Expand to also include service settlements e.g., Ford End which is proposed for new development (Dandara)
- Hammonds Farm is contrary to the principles (Obsidian Strategic, Dandara Eastern)
- The former BAE site should be allocated as a Special Policy Area (SPA) to guide its future redevelopment (Rosehart Properties Ltd)
- Place more emphasis on previously developed land (Dominus Chelmsford Limited)
- Expand h to include low carbon transport related infrastructure close to strategic transport junctions (CNG Fuels Limited)

- Plan proposals and site allocations fail to apply the principles in practice (Dandara Eastern, Vistry Group)
- Swap paras. 4.15 and 4.16 or merge h and i. Actively engaging with partners in 4.16 should apply to all new development not just significant new greenfield housing development (Wates Developments and Hammonds Estates LLP)
- Recommend an additional principle around integrating strategic green infrastructure with ecological networks and the wider landscape to deliver multiple environmental, social and economic benefits (Essex County Council)
- Object to plan reliance on the proposed garden communities, raising concerns over delivery in the early years of the plan period and disproportionately skewing new growth up to 2041 (Crest Nicholson)
- Expand supporting text of h and i to include references to police facilities (Essex Police)
- Various comments from landowners/developers suggesting that their proposed development sites will accord with the preferred Spatial Principles
- Do not agree. Need to include protection of Grade 2 agricultural land
- Parts a, h and I – for the policy to succeed it needs a strategy to link SWF to Chelmsford by regular public transport.

CCC response to the comments made
The Council can meet its development requirements without needing to undertake a Green Belt review. This approach accords with National Planning Guidance.
Additional references to providing police facilities have been added to other parts of the plan including the Vision and Strategic Priorities – no further changes considered necessary.
Reasoned Justification for Principles h and i to remain as written, as these are most applicable to the Spatial Principles they sit under. It should be noted that the Spatial Principles are not presented in any order of priority.
Integration of strategic green infrastructure is more appropriately dealt with under strategic policies including S4, S9, S16 and site allocation policies.
Other proposed development sites are dealt with in the consideration of Strategic Policy S7, and addressed by the Pre-Submission Integrated Impact Assessment.
The Settlement Hierarchy is just one of a number of considerations for the Spatial Strategy, along with the Vision and Spatial Principles, and is considered to be a robust approach.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.

Creating Sustainable Development

This section of the consultation document sets out Strategic Policies which underpin and guide the Spatial Strategy by addressing climate change, promoting social inclusion, conserving and enhancing the historic and natural environment and safeguarding community assets.

Strategic Policy S2 – Addressing Climate Change and Flood Risk

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Policy S2 – Addressing Climate Change and Flood Risk	13	5	36	36

Summary of Representations – main issues and suggested changes:

- Support expressed for policy (Natural England, Anglian Water Services Ltd, Crest Nicholson, This Land, Essex County Council, Wates Developments and Hammonds Estates LLP, Obsidian Strategic Asset Management Ltd, C J H Farming Ltd, Chelmsford & Central Essex RSPB Local Group, Sport England, Chris & Helen Copping, Pigeon (Sandon) Ltd)
- Add direct reference to our Green Infrastructure Framework and recognition of Green Infrastructure's role in strengthening climate change resilience (Natural England)
- Ensuring new development minimises flooding impact should be more ambitious towards delivering resilient growth and addressing opportunities for new strategic development to provide betterment in terms of flood risk (Anglian Water Services Ltd)
- Support expressed but emission reduction targets should consider the forthcoming 2025 Future Homes Standards (FHS) and not set a policy expectation that cannot be delivered and create viability issues. Review the viability assessment to consider Ministerial Statement 'Local Energy Efficiency Standards Update' and Government's appraisal of the FHS. Amend policy to 'encourage' net zero emissions 'as encouraged' by DM31 (Chelmsford Garden Community Consortium, Vistry Group)
- Support expressed but optimise housing densities to reflect additional costs and constraints of Net-Zero carbon new homes on developers (Dominus Chelmsford Limited)
- Concern that net zero requirements is being applied retrospectively to existing allocated sites (Hopkins Homes Ltd)
- Requirements go beyond current policy and guidance, may impact viability and deliverability of residential development, are not justified by the evidence base (Whirledge & Nott, Hopkins Homes Ltd) and are inappropriate as standards will change/evolve over the plan period (Hill Residential Ltd, Higgins Group, Dandara, Dandara Eastern). Policy requirements should instead be ambitions and applied flexibly (Croudace Homes, Whirledge & Nott)
- Do not support. Exceeding Building Regulations Part F and L is unsound. Relying on building regulations should be considered a policy reasonable alternative as it is the preferred approach by government (Home Builders Federation)

- The South East Marine Plan policies such as SE-EMP-1 should be used as evidence to support the local plans policies (Marine Management Organisation)
- Add reference to the South East Marine Plan remit and requirements for marine licences (Marine Management Organisation)
- Recommend reference to the marine/coastal/intertidal element of the policy area, particularly where both terrestrial and marine habitats have the potential to be impacted by the policy (Marine Management Organisation)
- Reference the name of the future flood resilience scheme in the policy (Environment Agency)
- Add additional bullet to assist the delivery of net gain for biodiversity that will restore our ecosystems and deliver mitigation and adaptation benefits (Essex County Council)
- Include actions to repair and increase the sea wall height around South Woodham Ferrers by 2041
- Policies should set out appropriate nature-based solutions for climate mitigation and adaptation such as woodland or wetland creation or peatland restoration. Consider the Climate Change Adaptation Manual, Carbon Storage and Sequestration by Habitat and National biodiversity climate change vulnerability model (Natural England)
- Addressing climate change must be compatible with other planning objectives including housing delivery (Gladman Developments Ltd)
- Add support for the decarbonisation of the road freight industry (CNG Fuels Limited)
- Support expressed but amend to direct growth to sustainable settlements to reduce travel by private car and promote active travel modes of transport, and to locations served by new strategic infrastructure including the Chelmsford North East Bypass (Bloor Homes (Eastern))
- Policy should support viable housing delivery and allow for site-specific Viability Assessment at the planning application stage (Bloor Homes (Eastern))
- The Exception Test should describe that 100% of the built development (for vulnerable uses) at Hammonds Farm is in Flood Zone 1, outside of the floodplain. The new Garden Community will incorporate measures to mitigate flood risk both within and off-site in all flood zones (Wates Developments and Hammonds Estates LLP)
- There is a discrepancy between the Environment Agency Peak Rainfall allowance and the SFRA 1. According to the Environment Agency, Table 4-2 in the SFRA Level 2 should be in accordance with the table submitted alongside this comment (Wates Developments and Hammonds Estates LLP)
- Various comments from landowners/developers suggesting that their allocated or proposed development sites will accord with this policy
- Plan does not acknowledge CO2 emissions from the construction industry
- Plan must contain a policy requiring all new development, where practical, to install solar panels on roofs.

CCC response to the comments made
Reference to Natural England's Green Infrastructure Framework has not been included in Policy S2 as it is covered elsewhere in the Local Plan, notably section 3.
Biodiversity Net Gain is addressed in other plan policies, notably Policy S4 and DM16 – it is not necessary to duplicate references in Policy S2.
Additional bullet to restore our ecosystems and deliver mitigation and adaptation benefits has been included.
The South East Marine Plan has been used as evidence to inform the Pre-Submission plan policies.
Additional references to the South East Marine Plan remit and requirements for marine licences have been added to Section 1. As the plan is read as a whole, no further reference is considered necessary.
Policy DM31 requires all new development to have rooftop solar photovoltaic (PV) panels.
Amendments made to the policy and Reasoned Justification referencing integrated water management techniques.
Whilst a named flood resilience cannot be stated at this time, reference has been added to a 'future flood resilience scheme'.
Amendments made to the Reasoned Justification to include a reference to latest technical guidance, including the Environment Agency's and CIRIA.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.

Strategic Policy S14 - Health and Wellbeing

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Policy S14 - Health and Wellbeing	14	2	30	30

Summary of Representations – main issues and suggested changes:

- Support policy and welcome reference to Sport England Active Design Principles (Sport England)
- Support expressed (Essex County Council, Anglian Water, Mid and South Essex Integrated Care Board (ICB), Wates Developments and Hammonds Estates LLP, Cliffords Group Ltd, Hill Farm (Chelmsford Ltd), Dominus Chelmsford Ltd)
- Amend to reference that tranquil landscapes can support mental health and wellbeing (Broomfield Parish Council)
- Define what is meant by an initial assessment to make the text clear that all larger scale developments should be the subject of a health impact assessment (Mid and South Essex Integrated Care Board (ICB))
- A site level HIA would repeat the plan IIA. HIAs may only be appropriate for larger unallocated sites where the impacts may not have been fully considered through the plan HIA (Home Builders Federation)

- Policy needs to be flexible, not every development will achieve each requirement given site constraints and characteristics. Add clarity on how a decision maker balances requirements when judging development proposals (Hill Residential Ltd and Higgins Group)
- Concern that requirements e.g., Livewell Development Accreditation Scheme, Sport England and National Design Guide Active Design principles are outside of the Local Plan process and subject to change without the same consultation and examination as other requirements (Hill Residential Ltd)
- Concern on how the viability of the policy has been considered (Hill Residential Ltd)
- Concern about the level of engagement needed with health care providers and identifying and delivering requirements in a timely manner to not delay developments (Hill Residential Ltd and Higgins Group)
- Suggest amendments to provide consistency and links with further guidance such as the Chelmsford Health and Wellbeing Plan, interconnectivity between the wider determinants of health, adaptable housing, Essex Design Guide and supplementary guidance (A New Development Model for Essex, October 2023) and Chelmsford Food Plan (2023) (Essex County Council)
- Policy does not address the needs of older people
- Healthcare facilities need to meet the needs of new communities.

CCC response to the comments made
Policy is designed to ensure that health and wellbeing is promoted within new development, rather than to identify existing places/areas which may help support mental health and wellbeing e.g. tranquil landscapes.
Reasoned Justification amended to clarify what and when HIAs will be required and to recommend early engagement with the Council and Essex County Council to inform decisions on development proposals
Reasoned Justification amended to provide consistency and links with further guidance such as the Chelmsford Food Plan (2023).
Site level HIAs will provide more detail on the health and wellbeing impacts of specific development projects.
The Pre-Submission Local Plan is supported by an updated Viability Assessment 2024.
Other plan policies seek to ensure that new development is supported by healthcare facilities, where appropriate, including site allocation policies and S9.
Policy DM1 ensures that the plan provides for a mix of housing including for older people.
No requirement to contribute towards priorities in the Essex Joint Health and Wellbeing Strategy added, as this document is subject to change and outside the control of CCC.
Bullet 8 is specifically about access to nature, reference to services and facilities would be inappropriate.
Other proposed amendments are not considered necessary/ appropriate/ or workable.

Strategic Policy S15 – Creating Successful Places

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Policy S15 – Creating Successful Places	1	2	11	11

Summary of Representations – main issues and suggested changes:

- Support as a key priority. Could refer to stewardship as well as place-keeping (Wates Developments and Hammonds Estates LLP)
- The policy aligns with developer's own development principles and is supported (Dominus Chelmsford Limited)
- Add a reference to the importance of providing the right amount and type of employment and business opportunities, particularly in larger developments and garden communities (Essex County Council)
- Considerations are suggested to minimise fire risk and spread of fire, ensure safe access, and reduce risks to water sources (Essex County Fire and Rescue Service)
- Concern that the policy could pose an unnecessary planning burden on functional development and do not support design codes which will be inflexible in some circumstances (CNG Fuels Ltd)
- This policy is already covered by S14 (bullet 3) (Dandara Eastern) and repeats the NPPF (Dandara, Higgins Group, Hill Residential).

CCC response to the comments made
Stewardship is an example of place keeping – so the specific reference is considered to be necessary.
Providing the right amount and type of employment opportunities is already addressed in Plan policies including site allocation policies – no further references are necessary.
Fire risk is covered by Building Regulations and other legislation, which does not need to be repeated in the Plan.

<u>Strategic Policy S3 – Conserving and Enhancing the Historic Environment</u>

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Policy S3 – Conserving and Enhancing the Historic Environment	6	1	10	10

Summary of Representations – main issues and suggested changes:

- Support (Historic England, Dominus Chelmsford Limited, C J H Farming Ltd, This Land, Pigeon (Sandon) Ltd)
- Recommend use of the South East Marine Plan policies as evidence to support the plan policies (Marine Management Organisation)

- Do not support. Delete ‘rare’ in reference to the canal water feature at Boreham House in para. 5.36 as this is misleading (CNG Fuels Limited)
- Policy wording should state the specific designated heritage assets on site and nearby, and specific mitigation measures identified in site Heritage Impact Assessments. Where there are impacts policies should read: "Development should conserve or where appropriate enhance the significance of heritage assets …. including any contribution made to their significance by their settings. Appropriate mitigation measure including … will be required (Historic England).

CCC response to the comments made
Additional references to the South East Marine Plan remit and marine licences have been added to Section 1. As the plan is read as a whole, no further reference is considered necessary.
It is rare to have a linear canal water feature at Boreham House. It is unique to Essex and the only other known early eighteenth-century example is Shotover in Oxfordshire. The description as ‘rare’ is therefore justified.
Heritage Impact Assessments were undertaken and published alongside the Preferred Options Local Plan. Site policies consider significance of designated and non-designated heritage assets.

Strategic Policy S4 – Conserving and Enhancing the Natural Environment

Key statistics:

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
Strategic Policy S4 – Conserving and Enhancing the Natural Environment	8	6	31	31

Summary of Representations – main issues and suggested changes:

- Support for the policy (Environment Agency, Natural England, Wates Developments and Hammonds Estates LLP, Chelmsford and Central Essex RSPB Local Group, CJH Farming Ltd, Pigeon (Sandon) Ltd)
- The policy ambition for 20% BNG is welcomed (Anglian Water Services Ltd)
- Suggest referencing other relevant evidence documents and the Local Nature Recovery Strategy and Networks (Essex County Council, Anglian Water Services Ltd)
- Add a reference to our Local Character Landscapes study, which highlights important and distinctive rural landscapes which should be valued and protected (Chignal Parish Council)
- Local Plan could draw on policies in the South East Inshore Marine Plan (Marine Management Organisation)
- The importance of the underlying aquifer/groundwater resource should be noted, with references added to pollution and protection guidance (Environment Agency)

- Make the distinction between public green spaces and wildlife habitats, with greater focus on integrating biodiversity rather than segregation; planting and biodiversity features should use native species; and call for riparian corridors to maintain a buffer zone for public space rather than private gardens (Environment Agency)
- RAMS contributions are welcomed, but additional accessible greenspace may also be required (Natural England)
- Contributions are no longer required to be secured towards recreational mitigation measures at Hatfield Forest SSSI/NNR (Natural England)
- Protection of best and most versatile agricultural land should be strengthened to support food security and shorten supply routes (Broomfield Parish Council)
- Opposition to a requirement for 20% BNG on the Garden Community Sites as it exceeds national requirements, and has not taken the cumulative effect of this and required tree planting into account (Bellway Homes Ltd)
- Concerns about the deliverability of 20% BNG on large greenfield sites; the policy should be more flexible to express this as a target and not a requirement (Whirledge and Nott, Croudace Homes, Vistry Group)
- Clarification of the BNG provision is needed, e.g. is delivery per phase or for overall development; offsite provision may be more appropriate so greater flexibility is suggested (Chelmsford Garden Community Consortium)
- The requirement for 10% BNG on most development is welcomed; a higher percentage of BNG would need robust evidence (Obsidian Strategic Asset Management, Dandara Eastern, Dandara, Hill Residential Ltd, Dominus Chelmsford Limited)
- Higher BNG requirements should take account of viability considerations, and a take more realistic view of the costs than assumed in the evidence base, which appear to be too low (Dandara Eastern).

CCC response to the comments made
References added to other relevant evidence documents and the Local Nature Recovery Strategy.
The plan is supported by its own landscape evidence base.
The South East Marine Plan has been used as evidence to inform the Pre-Submission plan policies.
10% BNG is a national requirement. 20% BNG for the Garden Community allocations has been subject to viability testing and is deliverable.
References to contributions towards recreational mitigation measures at Hatfield Forest SSSI/NNR have been removed as they are no longer required.
The distinction between public green spaces and wildlife habitats, biodiversity integration, use of native species and riparian corridor a buffer zones added to DM16. As the plan is read as a whole, no further reference is considered necessary.
Additional accessible greenspace is addressed in the Reasoned Justification and relevant site policies - no further reference is considered necessary.

Strategic Policy S5 – Protecting and Enhancing Community Assets

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Policy S5 – Protecting and Enhancing Community Assets	8	1	15	15

Summary of Representations – main issues and suggested changes:

- Support for the policy as it recognises the importance of sports and leisure facilities in new development and the need to secure new provision through planning obligations or CIL (Sport England)
- The proposal that existing community assets will need to be protected from inappropriate changes of use or redevelopment is supported as this is necessary for meeting current and future community needs (Sport England)
- Support for the policy (Dominus Chelmsford Limited, Cliffords, Hill Farm (Chelmsford) Ltd, Dandara/Dandara Eastern, Obsidian Strategic)
- Add references in policy and para. 5.59 to safe and cohesive communities and the protection of police facilities (Essex Police)
- Policy could be extended to community coastal assets using the South East Marine Plan policies as evidence (Marine Management Organisation)
- Support for the provision of sufficient, quality community facilities but the policy should be more flexible to avoid unjustified delays to vital reinvestment in health facilities and services for the community. The disposal of no longer suitable or redundant healthcare sites and properties helps to fund new or improved services (NHS Property Services Ltd).

CCC response to the comments made
Reasoned Justification amended to refer to safe and cohesive communities and the protection of police uses.
Policy covers a wide range of community assets – listing all types of assets is not considered necessary.
The policy is consistent with national planning policy, and appropriately covers healthcare facilities.

How will Future Development Growth be Accommodated?

This section of the consultation document sets out Strategic Policies which underpin and guide the Spatial Strategy including policies related to securing infrastructure and delivering growth.

How will Future Development Growth be Accommodated? (paragraph 6.1)

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Paragraph 6.1	0	0	1	1

Summary of Representations – main issues and suggested changes:

- Add that the strategic policies in this section secure 'facilities' as well as infrastructure (Essex Police).

Strategic Policy S6 – Housing and Employment Requirements

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Policy S6 – Housing and Employment Requirements	19	24	74	74

Summary of Representations – main issues and suggested changes:

- Support/some support for requirements and approach (Essex County Council, Basildon Borough Council, Rochford District Council, Brentwood Borough Council, Castle Point Council, Anglian Water Services Ltd, Broomfield Parish Council, S J R Farming, Hawridge Land, Dominus Chelmsford Limited, Obsidian Strategic Asset Management Ltd, Dandara Eastern, Cliffords Group Ltd, Wates Developments and Hammonds Estates LLP, Vistry Group, C J H Farming Ltd, Seax Development, Miscoe Enterprises Ltd, Home Builders Federation, This Land, Hill Farm (Chelmsford) Ltd, Van Diemans Property Company, Mrs A Mossman, A.G. & P.W.H Speakman, The Bucknell Family, Redrow Homes & Speakman Family, Crest Nicholson, Whirledge & Nott, Croudace Homes, Dandara, Pigeon (Sandon) Ltd, Daniel James Developments, Woolsington One, Welbeck Strategic Land V Limited)
- Support supply buffer (Broomfield Parish Council, Wates Developments and Hammonds Estates LLP, Dandara)
- Use some supply buffer to target affordable homes for local people in perpetuity e.g., through a Community Land Trust (Broomfield Parish Council)
- Expand para 6.16 for employment growth and skills capacity to aim to match levels of housing growth to help reduce out commuting (Essex County Council)
- Request whether Chelmsford can accommodate any of their unmet housing need (Castle Point Council and Southend-on-Sea City Council)
- Amend Part A to read 'at least' 1,000 net new homes (Mrs A Mossman)
- Use updated annual housing requirement (913 as stated in Turley, March 2024) and give high priority to bring empty properties back into use (Danbury Parish Council)
- Explore a higher housing requirement to meet all the housing needs of the area's residents including those living in unsuitable accommodation and newly forming households (Tritton Farming Partnership LLP)
- Need to consider how the ageing population affects housing needs as there is a significant growing need for more specialist housing units (Opus Little Waltham Developments Ltd)

- Housing for older people should have its own requirements and standalone policy (McCarthy Stone)
- Include requirements for elderly persons within the policy. Allocated sites will not meet needs alone (Mrs Mary Rance)
- Increase requirements above the minimum Standard. Reasons cited include to deliver greater choice and more affordable housing, address the housing crisis, reduce reliance on windfall sites, help meet neighbouring area's unmet needs, past housing delivery records and the significant new infrastructure coming to the area (Hill Residential Ltd, Tritton Farming Partnership LLP, Higgins Group, Gladman Developments Ltd, Bloor Homes (Eastern), Richborough, Martin Grant Homes)
- Expand Table 1 to reflect the amendments made to the yields of existing allocations and increase supply buffer to 20% to address in part an historic under delivery of affordable housing (Richborough)
- Need a more balanced/diverse pool of allocations, including small-medium sites (Martin Grant Homes) which are not/less constrained by infrastructure burdens rather than relying on Garden Communities (Richborough, Welbeck Strategic Land V Limited)
- Based on previous delivery rates, apply a non-implementation rate to allow for an element of under-implementation (Obsidian Strategic Asset Management Ltd), allocate more housing sites (Dandara, Welbeck Strategic Land V Limited) and identify Green Belt and non-Green Belt reserve sites (Newell Properties Development Ltd)
- No evidence that windfalls will continue to come forward given likely declining opportunities within built up areas. Affordable housing delivery will likely be lower than required. There is no assessment of the potential for double counting with the 3,745 homes that have permission and are capable of being built out in the next 5 years and beyond (Martin Grant Homes)
- The Duty to Co-operate Statement is unclear on what co-operation has taken place in relation to housing delivery and any unmet housing needs (Obsidian Strategic Asset Management Ltd)
- Plan needs to allocate more sites that could deliver more quickly based on previous housing delivery records and given Hammonds Farm will come forward later in the plan period (Dandara Eastern, Welbeck Strategic Land V Limited)
- Until the Gypsy and Traveller Accommodation 2024, we are unable to comment on numbers (IBA Planning Ltd, Vistry Group)
- Reconsider if the large strategic allocations will meet Gypsy and Travellers and Travelling Showpeople needs within a reasonable timescale. Confirm if the Gypsy and Traveller Accommodation Assessment includes Roselawn Farm in the baseline (IBA Planning Ltd)
- Do not support/object to policy (IBA Planning Ltd, Vistry Group, Chelmsford Garden Community Consortium, Mrs Mary Rance, McCarthy Stone, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- The evidence base and planning logic for Hammonds Farm is questionable (Dandara Eastern)

- No need to allocate sites 16a and 16b and their potential benefits do not out outweigh the significant adverse impacts. Alternative locations with less harmful impacts have not been properly considered. Hammonds Farm is not needed to address the area's housing requirements (as recommended by the Strategic Housing Needs Assessment). Existing employment allocations and commitments can meet minimum employment requirements, so Junction 18 of the A12 employment allocation is not needed (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- As Little Boyton Hall Farm Rural Employment Area (Location 15) is inaccessible by bus, walking or cycling it will lead to an increase in congestion on local roads (Chignal Parish Council)
- Spatial Strategy should support the rural and City economy and Chelmsford's status as a regional hub for employment (Hill Farm (Chelmsford) Ltd, Van Diemans Property Company)
- Encourage development of existing employment sites in sustainable locations given long lead-in times for large strategic site allocations (Rosehart Properties Ltd)
- Scenario 3 of the Employment Land Review (ELR) 2023 does not fully account for the planned growth in the economically active population
- The employment requirements are insufficient to meet the growing need of logistics in the area, given the locational advantages on the A12 corridor and the shift to larger warehouses and greater automation. In line with national policy, an objective assessment of the requirements of the logistics sector across the sub-region is required (Greystoke CB)
- Need to consider sites for employment in rural areas (The Bucknell Family)
- Spatial Strategy lacks a proportionate, district wide distribution of growth and infrastructure (Whirledge & Nott, Croudace Homes)
- Extend plan period to 2042/3 to allow for any timetable slippage and increase developments requirements accordingly (Gladman Developments Ltd, Greystoke CB)
- Various comments from landowners/developers promoting their proposed development sites will accord with the proposed Spatial Strategy
- There should be a high priority to bring empty properties back into use
- Support housing requirements
- Do not agree. An additional 4,000 homes are unnecessary, unsustainable, and make compliance with the Vision impossible.

CCC response to the comments made
Policy updated to reflect the proposed transitional arrangements for housing need and use of the new Standard Method to set housing figures and annual targets.
Policy updated to reflect the Gypsy and Traveller Accommodation Assessment (GTAA) 2024 which has been published.
Policy updated to reflect the Employment Land Review Focused Update 2024 which considers the most up-to-date assumptions and data regarding future economic growth prospects for Chelmsford between 2022 and 2041.
This plan seeks to meet and where appropriate exceed the minimum employment requirements over the plan period.

The size and type of housing, including that for new households and older people, is set out in policy DM1, and it is not appropriate to include it here.
Do not amend Reasoned Justification as employment growth and skills capacity is addressed in Policy S8 and reducing out commuting is not a plan requirement.
References to the employment evidence are included within the policy.
CCC has engaged with Castle Point Council and Southend-on-Sea City Council through the Duty to Co-operate and advised that Chelmsford cannot accommodate any of their unmet housing need.
Site allocation policies have been amended to require contributions towards police facilities.
See relevant site allocation policies for responses to site specific comments.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.

Strategic Policy S7 – The Spatial Strategy

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Policy 7 – The Spatial Strategy	21	32	144	144

Summary of Representations – main issues and suggested changes:

- Support/broad support expressed (Essex County Council, Anglian Water Services Ltd, Richard Speakman, Hawridge Land, Hallam Land Management, Cliffords Group Ltd, Gladman Developments Ltd, Wates Developments and Hammonds Estates LLP, Mr J Bolingbroke, C J H Farming Ltd, Seax Development, North Chelmsford Villages Community Group, Miscoe Enterprises Ltd, Cliffords Group Ltd, A.G. & P.W.H Speakman, The Bucknell Family, Redrow Homes & Speakman Family, Dandara, Pigeon (Sandon) Ltd, Daniel James Developments, Welbeck Strategic Land V Limited)
- Most new allocations will come forward from 2029 which will enable alternative wastewater treatment solutions to be developed where capacity is constrained (Anglian Water Services Ltd)
- Mostly support but using the Settlement Hierarchy to allocate future development is not effective or sustainable in practice. Delete references to the Settlement Hierarchy in the policy (Broomfield Parish Council)
- Delete requirement for GS9a to make a financial contribution to the Chelmsford North East Bypass as it is not needed (Essex County Council)
- Amend paras 6.43 and 6.49 and site policies to read that SGS6, 7, 8, 16a and 16b will help to deliver strategic infrastructure including the Chelmsford North East Bypass (Essex County Council)
- Amend para 6.24, bullet 1 to read ‘Sustainable urban extensions of Chelmsford, Great Leighs and South Woodham Ferrers for new housing and employment’ (Essex County Council)

- Add to all site policies infrastructure requirements to ensure wastewater treatment and disposal is available, including any required mitigation with the sewerage network (Environment Agency)
- After ‘infrastructure’ in line 2 of the penultimate paragraph add ‘and facilities’ (Essex Police)
- Site allocations and their respective policies need to be informed by Heritage Impact Assessments (Historic England)
- Reconsider if the large strategic allocations will meet Gypsy and Travellers and Travelling Showpeople needs within a reasonable timescale. Confirm if the Gypsy and Traveller Accommodation Assessment includes Roselawn Farm in the baseline (IBA Planning Ltd)
- Support rejection of Chatham Green and to expansion of SGS2 and SGS8 (Broomfield Parish Council)
- Expand reasons for rejecting expansion of Broomfield village to include landscape capacity and sensitivity, risk of settlement coalescence and primary school capacity concerns (Broomfield Parish Council)
- Agree with dismissal of alternative development sites (Wates Developments and Hammonds Estates LLP)
- Clarify in reasonable alternative text that significant expansion of North East Chelmsford is proposed during the plan period to 2041 (Wates Developments and Hammonds Estates LLP)
- There are no overriding constraints to the allocation of land at Junction 17 A12 (Greystoke CB)
- Enlarge Little Boyton Hall Rural Employment Area (Growth Site 15) and allocate for E(g)(i-ii) alongside B2 and B8 (C J H Farming Ltd)
- Requirements for masterplans on strategic sites should be on a site-by-site basis to reflect issues such as land use and landownership (C J H Farming Ltd, Pigeon (Sandon) Ltd)
- Object to 10 Traveller pitches for SGS6 (Chelmsford Garden Community Consortium) and additional travelling showpeople plot (Vistry Group)
- Unable to comment on Gypsy and Traveller requirements in absence of the Gypsy and Traveller Accommodation 2024 (Chelmsford Garden Community Consortium, Vistry Group)
- Reinstate adopted plan wording for around 1,200 new homes and around 1,000sqm of business floorspace for SGS10 (Vistry Group)
- Do not support/opposition expressed for policy (IBA Planning Ltd, Obsidian Strategic, Dominus Chelmsford Limited, Bloor Homes (Eastern), Vistry Group, Tritton Farming Partnership LLP, Dandara Eastern, This Land, Crest Nicholson, Mr Paul Hopkins, Richborough, ARU, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Mr and Mrs Andrew Parker, Mrs Fiona McCallum, Taylor Wimpey, Martin Grant Homes, Croudace Homes, Barratt David Wilson (Eastern Counties))
- Increase the housing requirement to help deliver more homes (Hallam Land Management), ensure development needs are met (Farming Partnership LLP, Newell Properties Development Ltd) and to address uncertainties with windfall sites (Urban Provincial, Martin Grant Homes)

- Proposed allocations fall short of housing requirements (Opus Little Waltham Developments Ltd)
- Housing trajectory is unrealistic without more allocations including within the Green Belt (Newell Properties Development Ltd)
- Existing allocated large-scale sites are not meeting the time-scales as predicted in the draft Plan (Dandara)
- The 20% buffer is largely formed by dwellings which are potentially undeliverable in the Plan period (Martin Grant Homes)
- Projected housing supply in the first five years is too ambitious and needs to be revised. Confirm status of allocated sites rolled forward to demonstrate delivery (Martin Grant Homes)
- Provide evidence to explain (i) how the preferred options were selected and (ii) the availability of services, functional relationships and sustainability used to inform the Settlement Hierarchy (Martin Grant Homes)
- Amend Settlement Hierarchy to read 'Chelmsford Urban Area'
- Allocate more small/medium housing and employment sites (Opus Little Waltham Developments Ltd, Richard Speakman, H R Philpot & Sons, Hill Farm (Chelmsford) Ltd, Van Diemans Property Company, Dandara, Mrs Carolyn Morling, Mr James Gardner, Bellway Strategic Land, Martin Grant Homes) including housing sites under 1ha (Tritton Farming Partnership LLP)
- Allocate a greater variety of site sizes cross more parts of the plan area including in/on the edge of Chelmsford Urban Area and in/around villages e.g., to ensure a more balanced distribution of growth and support rural areas and (Bloor Homes (Eastern), Seax Development, Gladman Developments Ltd, S J U 2016 discretionary settlement trustees, Dominus Chelmsford Limited, Hill Residential Ltd, Higgins Group, Miscoe Enterprises Ltd, Tritton Farming Partnership LLP, Bellway Homes Ltd, H R Philpot & Sons, Cliffords Group Ltd, Mr Graham Weal, A.G. & P.W.H Speakman, The Bucknell Family, Crest Nicholson, Mrs Carolyn Morling, Mr James Gardner, Taylor Wimpey, Martin Grant Homes, Barratt David Wilson (Eastern Counties))
- Provide Almshousing to help meet local affordable housing needs (Seax Development, Miscoe Enterprises Ltd)
- Provide housing for the elderly to meet local needs (J & T Wardrop and the Wardrop Trust)
- Plan needs a co-living policy (Highgate Capital Ltd)
- Review the Green Belt to identify the most sustainable strategy and sustainable Green Belt releases (Obsidian Strategic, Vistry Group, Mrs R Armstrong and Mr B Howard, H R Philpot & Sons, Newell Properties Development Ltd, Whirledge & Nott, Croudace Homes, Taylor Wimpey, Martin Grant Homes, J & T Wardrop and the Wardrop Trust, Barratt David Wilson (Eastern Counties))
- Not undertaking a Green Belt Review has led to unsustainable development patterns e.g., increased journey times to the City Centre, a lack of community infrastructure in areas and poor cohesivity with existing communities (Barratt David Wilson (Eastern Counties))

- Allocate additional/expand existing employment sites (including in the Green Belt) to provide flexibility and support existing employment areas/businesses (S J R Farming, Hill Farm (Chelmsford) Ltd, Saxtons 4x4)
- Policies S7, S8 and S11 should more clearly support rural businesses changing, expanding, adapting and improving to avoid disagreements at planning application stage (Strutt & Parker)
- Review of the role of the Green Wedge to promote active travel corridors and improve accessibility of the Green Wedge to areas of wildlife/ecological value (Cliffords Group Ltd)
- Review the Green Wedge to establish areas of land that serve little contribution to the role and function of the Green Wedge and to identify the most sustainable development options (Miscoe Enterprises Ltd, Hill Farm (Chelmsford) Ltd, Mr Graham Weal, The Bucknell Family, Mr Paul Hopkins)
- Plan is too reliant on large strategic sites (e.g. Garden Communities) making it inflexible/unreliable. There are delivery and viability risks/issues with such sites, long lead in times and the housing trajectory is over ambitious (Urban Provincial, Opus Little Waltham Developments Ltd, Richard Speakman, Hill Residential Ltd, Obsidian Strategic, Tritton Farming Partnership LLP, Bloor Homes (Eastern), Dandara, Bellway Homes Ltd, This Land, Dandara, Martin Grant Homes, Bellway Strategic Land, Martin Grant Homes, Croudace Homes, Welbeck Strategic Land V Limited, Barratt David Wilson (Eastern Counties))
- Concern/objection to Hammonds Farm allocation. Comments cited include previously scored poorly, physically and spatially detached from Chelmsford, requires significant infrastructure investment and too optimistic modal shift targets. More sustainable, accessible locations have been dismissed (Dandara, Bellway Homes Ltd, This Land, Bellway Strategic Land, Croudace Homes, Barratt David Wilson (Eastern Counties), Gladman Developments Ltd, Vishal Sharma)
- Council has ignored its evidence base (Croudace Homes) including by selecting Hammonds Farm over better performing sites (Mr and Mrs Andrew Parker)
- SGS16a and b are not needed to meet the area's housing and employment requirements; are in unsustainable and inaccessible locations; would have significant adverse impacts that cannot be adequately mitigated including on flood risk, highway network, landscape, heritage, loss of agricultural land, wildlife, ecology and minerals safeguarding; are situated within a highly sensitive setting; would significantly impact multiple Parishes and contradict relevant 'made' and emerging Neighbourhood Plans, and are premature as the land is a potential new area for a 'National Landscape' designation (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Croudace Homes)
- There is large-scale public objection to Hammonds Farm and there have been no changes since the plan adoption to warrant removing the land's current level of high protection (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)

- The proposed benefits of the Hammonds Farm development (e.g. new country park) do not outweigh the harm; the Council's evidence base is questionable/unsound and not all impacts have been properly assessed. More sustainable options to SGS16a and have been rejected without proper interrogation including the continued expansion of NEC, smaller-scale allocations across the Settlement Hierarchy and Green Belt development through a review. A landscape assessment, heritage assessment, flood risk statement and transport technical note are submitted alongside the representation (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- Hammonds Farm would be a long-term option and commencing before completion of North East Chelmsford will split available infrastructure funding and market interest. The Spatial Strategy fundamentally departures from the adopted Local Plan and 'made' Neighbourhood Plans, and the rationale for this 'U'-turn is unclear and unjustified (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- Separation between Chelmsford and Danbury would largely disappear with Hammonds Farm contrary to the Spatial Principles (The Danbury Society)
- Hybrid Spatial Strategy options were not part of the consultation (The Danbury Society)
- Constraints at SGS6 and Great Leighs SGS7 (e.g. heritage, Critical Drainage Area) could delay delivery (Wates Developments Limited, Urban Provincial)
- Splitting the Settlement Hierarchy by Outside and Within the Green Belt is not justified and fails to reflect development opportunities across the plan area (Hill Residential Ltd, Higgins Group)
- South Woodham Ferrers should be its own category in the hierarchy given its scale and service provision
- Delete requirement for proposals within Special Policy Areas to be considered against an approved masterplan as education priorities date quickly requiring regular costly updates. Instead assess proposals against prevailing plan policies (ARU)
- Spatial Strategy should specifically recognise the needs of the logistics sector in Chelmsford (Greystoke CB)
- Increase capacity of GS17b to at least 30 dwellings in line with the SHELAA (Mrs A Mossman)
- Expand allocations 3b, 3c and 3d at East Chelmsford (Redrow Homes & Speakman Family)
- Expand 14b for 50 homes (Dandara)
- 20 units at 11c fails to make effective use of land. Allocate for more homes to help deliver improvements to local services and facilities (Welbeck Strategic Land V Limited)
- Increase allocation for Danbury. Question suitability of allocating through the Neighbourhood Plan which is not time-controlled risking delayed site delivery (Richborough)
- Provide more flexibility on growth outside settlement limits (Park View Group)

- Various comments from landowners/developers/promoters promoting that their proposed development sites should be allocated in the Spatial Strategy and added to the Key Diagram
- Various comments disagreeing with the Council's SHELAA 2024 site assessment methodology and/or scoring of their submitted sites
- The A132/B1012 Improvements fail to consider the increase in traffic flows from the development to the east of SWF
- The Secretary of State regarded about 1000 homes acceptable for SGS10
- Better to build on brownfield land or the edge of large towns
- Consider traffic impacts of RHS Hyde Hall Special Policy Area which will be improved/enlarged causing increased traffic on Willow Grove
- Support expressed including protection of the Green Wedge and Green Belt
- Opposition expressed e.g., development proposals will spoil the countryside, adversely impact on road safety and congestion
- Build on brownfield land or the edge of large towns
- Opposition expressed to Hammonds Farm allocation. Reasons include it is not properly evidenced or justified; loss of agricultural land; more sustainable locations are available; lack of existing infrastructure; landscape, biodiversity and heritage impacts, increased traffic impacts and congestion; no guarantee that the development and infrastructure can be delivered in the time scale; shortage of GPs; pollution; detached from Chelmsford; not close to new and existing transport infrastructure such as the new bypass; would require disproportionate investment in highways infrastructure, and lack of existing utility provision
- There is no advantage to Hammonds Farm over North East Chelmsford
- Hammonds Farm should not be the sole major growth area
- Need to undertake a Green Belt Review to identify sustainable new housing Green Belt settlements to sustain their vitality and services
- Unclear why expansion of North East Chelmsford is no longer deliverable since the Issues and Options consultation
- There is nothing to prevent mineral extraction and housing development in North East Chelmsford over the plan period
- Plan is premature as Labour propose 'grey belt' land which could be a better alternative to Hammonds Farm
- Re-distribute growth around planned new infrastructure i.e. North East Chelmsford and away from Hammonds Farm
- Concerns about 14a and 14b e.g., loss of agricultural land and flood risk
- Question classification of Ford End as a Service Settlement as it lacks services including a shop
- Opposition expressed to SGS2 and SGS3
- Consider growth east of Great Baddow, north of Writtle village, and land surrounding Galleywood and Danbury instead of proposed spatial strategy
- Large solar farms should be designated and shown as semi industrial on Local Plan diagrams.

CCC response to the comments made

Wording added to Settlement Hierarchy to clarify that ‘Chelmsford’ includes its Urban Area such as Chelmer Village, Great Baddow and Springfield.
The Settlement Hierarchy ranks settlements according to their size, function, characteristics and sustainability. It is one of many factors used to inform where development is most sustainable and informs planning decisions so is retained.
Reference to exception sites in the Policy expanded to include affordable and community-led developments.
Reference to ‘sustainable urban extensions’ in the Reasoned Justification expanded to clarify these include extensions at Great Leighs and South Woodham Ferrers, as well as Chelmsford.
Reasoned Justification updated to reflect latest predicted losses of Grade 2 and Grade 3 agricultural land as a result of development in the Plan.
Requirement for GS9a to make a financial contribution to the Chelmsford North East Bypass deleted as evidence shows it would be unreasonable to require this site to contribute to this.
Reasoned Justification amended to refer to SGS6, 7a, 7b, 7c and 8 helping to deliver strategic infrastructure including Section 1a of the Chelmsford North East Bypass.
All numbers and locations updated to reflect latest housing, employment and Gypsy and Traveller numbers and site allocations.
Site policies have been amended to ensure wastewater treatment and disposal is available, including any required mitigation with the sewerage network.
Reference to the need for police facilities has been added to Policy S9 and relevant site policies. The Plan should be read as a whole, so it is not necessary to duplicate in this Policy.
Heritage Impact Assessments were published alongside the Preferred Options Local Plan and have been used to inform site allocation policies.
Large strategic allocations will meet Travelling Showpeople needs in full with delivery on some sites within the first five years of the Plan.
The 2024 Gypsy and Traveller Accommodation Assessment includes Roselawn Farm in the baseline and is published as part of the evidence base.
Due to the lack of available and suitable alternative sites for Gypsies, Travellers and Travelling Showpeople, and the need to build cohesive and inclusive communities, the most appropriate way to meet these needs is through larger strategic site allocations.
Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Consultation Document and IIA.
The housing supply includes a small supply buffer, and the Council can demonstrate a Five Year Housing Land Supply which will be monitored through the Authority Monitoring Report throughout the Plan period. Housing figures are ‘around’ and allow for more units to come forward if sites can accommodate them in a sustainable manner. For these reasons no further housing allocations are required.
The Housing Trajectory and timings within it are considered deliverable as established through the Council’s Five Year Housing Land Supply Methodology (April 2024). The Trajectory is updated annually, and the Pre-Submission Local Plan uses the latest available Housing Site Schedule (April 2024).
The site allocations, with the addition of existing permissions and windfall sites as set out in the April 2024 Housing Site Schedule, creates a good range of site sizes to assist in delivery of sites to meet housing needs over the Plan period.

The Council can meet its development requirements without needing to undertake a Green Belt review. This approach accords with National Planning Guidance.
The 'small sites' (under 1ha) are an important part of the Plan to ensure delivery of a variety of sites in a timely manner, and to meet NPPF requirements to provide 10% of small sites. The enlargement of these sites would be likely to put greater pressure on local facilities and infrastructure which could make such sites unsuitable for development.
Policy DM1 has been amended to introduce a new requirement for 10% market housing for Older Persons on greenfield sites of more than 500 dwellings.
There is no requirement or local need for the Plan to include a co-living policy.
The employment allocations alongside existing commitments are expected to meet the identified employment needs. The use of 'around' employment floorspace figures in specific site allocation policies allows for an appropriate degree of flexibility in provision. DM4 protects, and allows for expansion of, existing employment uses – the Plan should be read a whole, so it is not necessary to repeat in Policy S7.
Suitable brownfield sites have been allocated within the Urban Area. There are not sufficient brownfield sites to meet the Local Plan's development requirements so greenfield sites must be allocated.
The requirement for Masterplans for strategic sites and SPAs goes beyond just land use and ownership and are required to ensure wider community and stakeholder engagement at an early stage of the planning process. Reference to these being approved before a planning application is submitted has been amended to require them to be approved before a planning application is determined. It is noted that a masterplan for ARU was approved in 2024.
Policies DM8 and DM11 provide support for the growth and expansion of rural businesses – no need to add further details to Strategic Policies.
The SHELAA has been updated to inform the Pre-Submission Local Plan and any appropriate changes or updates have been made.
It is not necessary to allocate specific sites for renewable energy production as the suite of policies within the Plan allow for such developments to come forward. A number of planning applications for such large-scale development, including a large DCO for 'Longfield Solar Farm' have been approved in the Council's administrative area, demonstrating that the policies are sufficient to allow for such development to come forward and that there is no specific need to allocate sites.
See relevant site allocation policies for responses to site specific comments.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.

CCC responses to site allocation consultation comments appear under the relevant specific site policy. For example, see page 112 for CCC responses to Hammonds Farm (SGS16a).

Strategic Policy S8 - Delivering Economic Growth

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses

Strategic Policy 8 - Delivering Economic Growth	8	1	22	22

Summary of Representations – main issues and suggested changes:

- Policy is broadly supported (Gladman, C J H Farming Ltd, Van Diemans Property Company, Wates Development and Hammonds Estates LLP)
- Bullet 1 should also refer to active modes of transport (Essex County Council)
- Add a new bullet supporting regional growth sector priorities and clustering of economic activity (Essex County Council)
- Add reference in para 6.58 to the need for an appropriate mix of uses to reflect market need (Essex County Council)
- Amend para 6.59 to remove the reference to South East Local Enterprise Partnership and include a reference to the Local Skills Improvement Plan (Essex County Council)
- Paragraph 6.62 should refer to the importance of the strategic sites and Garden Communities creating the agglomeration for economic development (Essex County Council)
- Reference ECC's Developers Guide to infrastructure contributions in the Reasoned Justification. Para 6.63 should reflect the need for Employment and Skills Plans to be agreed by the LPA and ECC ahead of agreeing S.106 Agreements (Essex County Council)
- Concerns expressed that the SGS15 scored lowest in average sustainable accessibility in the Transport Impact Appraisal (Chignal Parish Council)
- In accordance with the NPPF and PPG, the policy should be amended to reference the logistics sector (Greystoke CB)
- Additional smaller employment sites should be allocated to further diversify Chelmsford's economy (Hill Farm (Chelmsford) Ltd, Van Diemans Property Company)
- Add an additional bullet to refer to low carbon transport infrastructure (CNG Fuels Ltd)
- The South East Marine Plan policies such as SE-EMP-1 should be used as evidence to support the local plans policies (Marine Management Organisation).

CCC response to the comments made
Various amendments to strengthen and update the policy including references to active and sustainable modes of transport and support for regional growth sector priorities and clustering of economic activity.
The policy includes B8 development as stated in Reasoned Justification – no further change considered necessary.
Additional references to the South East Marine Plan have been added to Section 1 (Introduction) of the plan. As the plan is read as a whole, it is not considered necessary to repeat this in Policy S8.
The policy already refers to the sectors which will be nurtured - reiterating this in the Reasoned Justification in relation to strategic sites would be duplication.

The plan will allow for a range of different employment uses to come forward, where appropriate – there is no evidence to justify a specific reference to low carbon transport infrastructure.
The policy for SGS15 Little Boyton Hall Farm requires a range of measures to promote active travel safe to the site.
The plan allocates a range of employment sites to meet the employment floorspace requirements in the Policy S6 – no further allocations required.

Strategic Policy S16 – Connectivity and Travel

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Policy 16 – Connectivity and Travel	14	2	26	26

Summary of Representations – main issues and suggested changes:

- Support for the policy (Essex County Council, Sport England, Wates Developments and Hammonds Estates LLP, Cliffords Group Ltd, Dandara / Dandara Eastern, Gladman Developments Ltd, Hill Residential, Dominus Chelmsford Ltd, CJH Farming Ltd, The Bucknell Family, Chris & Helen Copping, Pigeon (Sandon) Ltd, Daniel James Developments
- Welcome further text relating to Bio/CNG and alternative fuels (CNG Fuels)
- Add a reference to how the policy can support the LCWIP routes through physical provision or financial contributions (Essex County Council)
- Include actions to remove barriers to travel for vulnerable users (Essex County Council)
- Encourage the plan to take account of the challenging targets for mode share and road safety as already in place in London (Transport for London)
- Walkable neighbourhood principles may not always be achievable, particularly for logistics development (Greystoke CB)
- Clarification sought on definition and thresholds for major and strategic development (ARU)
- Add reference to development proposals having regard to the principles in Active Design as well as the Essex Design Guide as the Walkable Communities Principle provides guidance on practical measures for implementing walkable neighbourhoods (Sport England)
- Include reference to the modal hierarchy, distinguish between the bullets points in Part A and clarify alternatives for commercial vehicles (Wates Developments and Hammonds Estates LLP)
- Concerns about future traffic and impact on Great Baddow and the Baddow bypass
- There needs to be greater provision for disabled parking close to the shops in the City Centre, and better public transport
- Better public transport is needed particularly from Chelmer Village to Springfield and Beaulieu Park.

CCC response to the comments made
Strategic Policy S1 includes the modal hierarchy – the plan should be read as a whole, so it is not necessary to repeat it in Policy S16.
The bullet points under Section A seek to achieve different measures to achieve active and sustainable transport and are retained.
Reasoned Justification describes alternatives for commercial vehicles – no further change considered necessary.
Reasoned justification amended to include a wider definition of vulnerable users.
Reference to how development can support the delivery of LCWIP routes added to the Reasoned Justification.
The definition and thresholds for major and strategic development in the policy are appropriate – no further change considered necessary.
Reference to the London Plan is noted. The Chelmsford Local Plan includes targets for mode share and seeks to improve safety and connectivity.
Reference added to development proposals having regard to the principles in Active Design.
Walkable neighbourhood principles are already addressed adequately in the policy – no further change considered necessary.

Strategic Policy S9 – Infrastructure Requirements

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Policy 9 – Infrastructure Requirements	23	3	48	48

Summary of Representations – main issues and suggested changes:

- Support for the policy (Sport England, Environment Agency, Gladman, Anglian Water, Tritton Farming Partnership LLP, Dominus Chelmsford Limited, Whirledge and Nott, Croudace Homes, Vistry Group)
- The list of transport infrastructure measures should better reflect the correct user hierarchy prioritisation of sustainable modes (Wates Developments and Hammonds Estates LLP)
- The policy fails to specifically address the potential impacts of sites 16a and 16b on Danbury, combined with planned housing growth in Maldon, South Woodham Ferrers and Danbury, and the potential new power station. Modelling has already shown that mitigation is needed for Eves Corner and Well Lane junctions, without additional growth (Danbury Parish Council)
- Add active and sustainable travel to education and health facilities (Essex County Council)
- Separate Chelmsford North East Bypass and new Park and Ride sites bullets, refer to bypass phasing and future actions, and separate bus priority and inter-urban public transport bullets (Essex County Council)
- Update route-based strategies for the A414 and A132, including requirements for physical or financial contributions where development adds traffic (Essex County Council)

- Provide evidence to support the strategy for the A132, it is close to capacity and improvements may not deliver the required improvements
- Support principle of a sustainable bridge connection from Site 16a directly into Sandon Park and Ride but some qualifying text is needed (Wates Developments and Hammonds Estates LLP)
- There are opportunities to improve the National Cycle Network in the area, namely improvements to NCN1 and an additional route the junction 19 which would link to Beaulieu Station and North Chelmsford, as well as providing a link to the countryside for leisure cyclists and is a better alternative to the existing cycle route (Cycling UK)
- Would not support buses through the Park and Ride site, and would prefer a connection nearby (Essex County Council)
- The supporting text refers to new development creating demand for cycling, rail and road use only. The wording should be updated to include reference to walking and buses (Wates Developments and Hammonds Estates LLP)
- Clarify the supporting text to evidence the requirement and timing for the Chelmsford North East Bypass (CNEB) Phases 1b and 2. The requirement appears to be associated primarily with background increases in traffic using the A12, rather than trips from Hammonds Farm (Wates Developments and Hammonds Estates LLP).
- Support for the conclusion of the Transport Impact Appraisal of Preferred Spatial Approach (March 2024) that by maximising the potential for sustainable accessibility to and from the site along the A12 corridor, the impact on the strategic highway network should not be considered severe – rather than a requirement to ensure that background traffic flows along the A414 are not unreasonably delayed by the addition of development trips as stated elsewhere in the appraisal (Wates Developments and Hammonds Estates LLP)
- Include a reference to the Chelmer Waterside access bridge, to be consistent with Strategic Policy S17 (Essex County Council)
- The Army and Navy improvements are wider than the junction itself and include connecting routes (Essex County Council)
- Further assessment work is underway on some road locations, and we will work with the Council on appropriate mitigation if necessary (Highways England)
- Any new Park and Ride site for West Chelmsford should be outside the Green Belt (Writtle Parish Council)
- There is a need for joint working between South Essex authorities to improve sustainable travel connectivity north-south, particularly for access to jobs; and to address implications and opportunities arising from Thames Freeport (Castle Point Council)
- Changes to the strategic road network should be considered in the context of potential impacts on the wider network, including the A12 in London (Transport for London)
- Concerns about future traffic and impact on Great Baddow and the Baddow bypass
- Add provision of 5G mobile service to the utilities section (Essex County Council)

- Encourage opportunities to enhance and establish green infrastructure along sustainable transport and the Public Rights of Way networks (Essex County Council)
- Include a policy reference to incorporating urban greening (Natural England)
- Strengthen reference to the capacity of foul drainage and waste water treatment to address pollution prevention (Chelmsford & Central Essex RSPB Local Group)
- Add further text relating to low carbon refuelling facilities (CNG Fuels)
- Reword policy to be consistent with Policy DM16, and to clarify that bespoke mitigation measures, where appropriate, would be in addition to RAMS contributions (Natural England).
- Add references to the requirement for a range of developer funded police facilities to provide for effective community safety, cohesion and policing to create sustainable new communities (Essex Police)
- The Cathedral School is at full capacity and would need to expand to two form entry to meet demand, but a strategic approach is required to include independent schools in overall longer-term education planning and funding as part of a cohesive strategy (The Cathedral School)
- All the required infrastructure should be set out in each site policy to make it clearer what they are expected to provide (Dandara, Hill Residential Ltd) and clearly linked to proposed growth
- It is unclear how infrastructure will be delivered, implemented and funded (Higgins Group)
- Policy should address the need to mitigate impacts on primary, community, acute and ambulance service capacity (Mid and South Essex Integrated Care Board (ICB))
- Lack of hospital capacity, with sufficient car parking, and GP capacity is an issue
- If we cannot provide the infrastructure, we should not build the houses and there should be legal requirements to ensure that schools, GPs, cycle routes, bus lanes are provided
- Evidence documents refer to uncertainty in forecasting forward beyond 2041 and therefore do not test more than 3,000 dwellings at East Chelmsford Garden Community (Hammonds Farm) (Wates Developments and Hammonds Estates LLP).

CCC response to the comments made
It is not necessary to list transport infrastructure by order of the modal hierarchy – no further change considered necessary.
Cross-boundary issues related to sustainable travel connectivity north-south, and to address Thames Freeport are addressed in Section 1 of the plan (or Introduction) – the plan should be read as a whole, so it is not necessary to repeat them here.
Qualifying text relating to the bridge connection from Site 16a is provided in the site policy (SGS16a).
Reasoned Justification refers to new development creating demand for measures to encourage sustainable travel choices which includes for walking and buses.
Reasoned Justification amended to the reflect the latest position regarding the funding for the Chelmsford North East Bypass (CNEB). With section 1a being funded by the Housing Infrastructure Fund, followed by section 1b and section 2,

which are anticipated to be subject to a future round of Department for Transport/Major Road Network funding combined with developer contributions and will be delivered at a later date.
Reference to ‘emergency services infrastructure’ replaced with “Police, ambulance and fire and rescue facilities” for completeness. Adding additional references to policing and police facilities would add unnecessary duplication.
Requirements for developer funded police facilities is addressed in the Infrastructure Delivery Plan and such detail is not appropriate within a Strategic Policy – no further change considered necessary.
Policy already contains a specific section on utilities which includes foul drainage and waste water treatment. Requirements for utilities is addressed in the Infrastructure Delivery Plan and relevant site allocation policies informed by the Water Cycle Strategy including SGS7a– no further change considered necessary.
It is not necessary to list other examples of sites that Beaulieu Park rail station will encourage sustainable travel to – no further change considered necessary.
The requirement for ‘Improvements to the Improvements to the Army and Navy Junction’ has been expanded to include the routes connecting to the junction as part of a sustainable transport package.
For completeness, reference to the A1016 has been added to ‘New foot/cycle bridge across A131’.
Reference to new and improved active and sustainable travel routes has been expanded to include reference to ‘bridges’ to reflect additional items identified by the updated IDP. The need for such routes to connect to education and health centres has also been added to this bullet point.
The need for a new active and sustainable route and bridge over the A12 from East Chelmsford Garden Community to connect to Sandon Park and Ride has been amended to connect ‘close’ to the Park and Ride.
Reasoned Justification amended to refer to 5G mobile connectivity.
The requirement for bus priority measures has been expanded to also include ‘bus services’ and has been separated into two bullet points from the requirement for ‘Improvements to inter-urban public transport’.
Measures to promote the greening of sustainable transport and Public Rights of Way is outside the scope of this Policy and is addressed by Policy S4 – no further change considered necessary.
Reasoned Justification updated to reflect the latest position with regards to the CNEB, Route Based Strategies for Mid Essex and Local Transport Plan.
The provision of new lock and replacement of weir gates at Chelmer Waterside, the provision of serviced moorings along the River Chelmer, and cemetery space and crematorium provision have been added to the policy requirements to reflect additional items identified by the updated IDP.
The IDP sets out how infrastructure will be delivered, implemented and funded so it is not necessary to repeat this detail in the policy - no further change considered necessary.
Contributions towards addressing cumulative recreational pressure on SSSIs has been added as a policy requirement to reflect the site specific policies requiring this.
Reasoned Justification updated to require major developments to provide suitable alternative and accessible natural greenspace on-site, in addition to financial contributions in accordance with the adopted RAMS Supplementary Planning Document.

Strategic Policy S10 – Securing Infrastructure and Impact Mitigation

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Policy 10 – Securing Infrastructure and Impact Mitigation	11	2	28	28

Summary of Representations – main issues and suggested changes:

- Supportive of the policy (Environment Agency, Anglian Water, Vistry Group, Chelmsford Garden Community Consortium, Essex County Council, NHS Property Services Ltd, Wates Developments and Hammonds Estates LLP)
- Include reference to 'facilities' within the policy and Reasoned Justification (Essex Police)
- Include reference to green and 'blue' infrastructure (Essex County Council)
- Amend 'emergency services' to 'police, ambulance and fire and rescue facilities' (Essex Police)
- Delete second policy paragraph as it should not be for a development, especially for one that has been allocated in the local plan, to subsequently demonstrate that there is sufficient capacity within local infrastructure to support that development (Home Builders Federation)
- Any reliance placed on planning obligations to fund infrastructure need to consider how much growth is being directed to locations that relate to such infrastructure, and whether such growth is sufficient to provide the requisite funding (Tritton Farming Partnership LLP)
- New housing sites necessitate developer funded police and healthcare facilities to be provided. Further changes are set out by Essex Police throughout the Plan (Essex Police, Mid and South Essex Integrated Care Board)
- Policies S9 and S10 should address the need to mitigate impacts on primary, community, acute and ambulance service capacity (Mid and South Essex Integrated Care Board)
- Greater clarity is sought within the evidence base with regards to specific details on the infrastructure being required for each site and how that will be secured. At present there is no link between Policy S9 and Policy S10 which should explain which infrastructure is relevant to which site and how delivery will be secured (Whirledge & Nott, Croudace Homes)
- Include reference to the fact the IDP is a living document that will continue to be updated in the Reasoned Justification (Essex County Council)
- Supportive of the reference to 'flood protection' in the Reasoned Justification (Environment Agency).

CCC response to the comments made
Last sentence of the policy regarding the need to ensure that the cumulative impact of planning policy, standards and infrastructure requirements do not render most sites and development identified in the Local Plan unviable and therefore undeliverable has been moved to the Reasoned Justification.

Definition of infrastructure expanded to include green and 'blue' infrastructure.
Reasoned Justification expanded to clarify that the Infrastructure Delivery Plan is a 'living' document that will be reviewed to ensure the most up-to-date information is used to inform the planning application process.
All site allocation policies have been updated to clarify that financial contributions for infrastructure listed in the site policy and Policy S9 will be sought in accordance with Policy S10.

Strategic Policy S11 – The Role of the Countryside

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Policy 11 – The Role of the Countryside	8	4	29	29

Summary of Representations – main issues and suggested changes:

- Support policies which prevent development on the land between the A12 Bypass and the Green Belt, even if the Green Belt boundary changes (Essex Local Access Forum)
- Preserve agricultural land within the Green Belt between Chelmsford and south of the A12 as a breathing space for inhabitants
- Amend policy to align with Council's response to the climate and ecological emergency to add significant material weight to developments that assist in delivering net zero emissions (CNG Fuels)
- Add more protection for the rural villages to prevent encroachment from larger settlements (Sandon Parish Council)
- Undertake a Green Wedge review (The Bucknell Family, Cliffords Group Ltd, Vistry Group, Obsidian Strategic Asset Management Ltd, Miscoe Enterprises Ltd and Hill Farm (Chelmsford) Ltd)
- Policy should be more flexible to allow sustainable development to come forward outside of defined built-up areas (Gladman Developments Ltd)
- Support principle of Green Wedges but no need for a specific Green Wedge Policy (Obsidian Strategic Asset Management Ltd)
- Support reference to Landscape Character Assessments, Historic Landscape Characterisation Study, Sensitivity and Capacity Assessments evidence base (Chignal Parish Council)
- Support policy (Writtle Parish Council)
- Question whether all areas of Green Belt serve the five key purposes as the context and role of these areas has evolved, particularly, land south of Chelmsford (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- A Green Belt Review should be undertaken (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Newell Properties Development Ltd, Hill Residential Ltd, Vistry Group, Higgins Group)

- Amend to refer to the Essex Green Infrastructure Strategy (2020) and the Essex Green Infrastructure Standards Technical Guidance, Essex Green Infrastructure Standards Non-Technical Guidance and the Local Nature Recovery Strategy (Essex County Council)
- Suggests policy wording in relation to rural economic development, with particular regard to existing businesses in rural locations, is clarified and more supportive of growth, expansion and diversification to avoid different interpretations at planning application stage (Strutt and Parker)
- Consider a small-scale alteration to the Green Wedge boundary and an extension to Widford Employment Area (Saxtons 4x4)
- Comments from landowners/developer suggesting alternative development sites are taken forward.

CCC response to the comments made
Plan seeks to prevent the encroachment of growth into undeveloped areas and the coalescence of existing built-up areas – no further changes needed.
Development growth in the Green Belt has been discounted as there is sufficient and suitable land is available outside the Green Belt to meet the development needs in a sustainable way. It would also undermine national planning policy. A Green Belt Review is not required.
The Green Wedge is a locally important designation. Changes to the Green Wedge boundaries to allow development growth has been discounted as there is sufficient and suitable land elsewhere to meet development needs in a sustainable way. No Green Wedge Review is required, and the deletion of Green Wedge policies would be inappropriate.
Other policies in the plan adequately deal with net zero carbon, Green Wedge and Rural Area development including DM8 and DM31. The plan should be read as a whole, so further provision in S11 would be duplication.
CCC has prepared its own Green Infrastructure Strategy and Action Plan for the plan area – it is not necessary to also refer to the Essex-wide documents.
Reasoned Justification amended to clarify that reference is made to the spatial role and function of land.
A range of alternative development sites have been considered and rejected when developing the Spatial Strategy. More information is set out in the IIA, Spatial Strategy Topic Paper and Preferred Options Local Plan.

Strategic Policy S12 – Role of City, Town and Neighbourhood Centres

Key statistics:

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
Strategic Policy S12 – Role of City, Town and Neighbourhood Centres	0	0	3	3

Summary of Representations – main issues and suggested changes:

- Support the distinction of centres with Chelmsford City Centre listed first (which is contrary to Policy S7) (Dominus Chelmsford Limited)
- Consider adding Hammonds Farm Neighbourhood Centre to the list of centres identified in para. 6.125 (Essex County Council)
- The policy lacks a reference to the benefits of/need for appropriate residential uses on upper floors in the city centre/designated centres (Dominus Chelmsford Limited/ Highgate Capital Limited).

CCC response to the comments made
As Hammonds Farm has not yet been built, the exact scale and location of a neighbourhood centre is currently unknown, so no change is proposed.
Strategic Policy S17 adequately covers the opportunities for residential uses on upper floors in Part C: Living in the City Centre. Residential use on the upper floors of designated centres is also covered by Policy DM5.

Strategic Policy S17 – Future of Chelmsford City Centre

Key statistics:

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
Strategic Policy S17 – Future of Chelmsford City Centre	6	1	9	9

Summary of Representations – main issues and suggested changes:

- Proposals for flood defences and flood management are welcome. The supporting text could include encouragement for developers to liaise with the Chelmsford Flood Resilience Partnership (The Environment Agency)
- Support for innovative and sustainable approaches, long-term resilience, nature-based solutions and natural flood management (Anglian Water Services Ltd)
- Support for policy approach, and specifically for The Meadows with some enhancements to text proposed (Dominus Chelmsford Limited)
- Amend text to refer to Park and Ride as part of bus connections (Essex County Council)
- Opportunity corridors supported – suggest amendment to reflect availability of planning tool for urban greening, and provide clarification of appropriate land uses (Essex County Council)
- The Meadows was only built in 1992 and does not need to be rebuilt, the proposal is unsustainable
- Proposals for The Meadows should include health facilities.

CCC response to the comments made
The policy has been redrafted to reduce its length and remove repetition. Detail that was contained within Part F. is now largely contained in the relevant site policies SGS1a and SGS1w.
Part D. Bullet 2, reference to Park and Ride has been added.

Figure 15, Area 5, has been updated to include the allocation of Andrews Place (SGS1cc).
Reference to the Chelmsford Flood Resilience Partnership is made in Strategic Policy S9. The plan should be read as a whole, so further provision in S17 would be duplication.

Strategic Policy S13 – Monitoring and Review

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Policy S13 – Monitoring and Review	4	0	6	6

Summary of Representations – main issues and suggested changes:

- Support for policy (Richborough, Vistry Group, Higgins Group, Hill Residential Group, Gladman)
- Add a commitment for the future review to be completed and adopted within five years to ensure a rolling up-to-date Local Plan (Richborough)
- A full review is always necessary over a focussed review (Hill Residential Ltd).

CCC response to the comments made
No changes have been made as the policy meets the necessary requirements and sets a date for a future review.

Where Will Development Growth be Focused?

This section of the consultation document provides the site policies for delivering the Spatial Strategy.

Section 7 – Where Will Development Growth be Focused? (Paragraph 7.1 to 7.6)

Consultation point	Yes	No	Comments	Total number of responses
Section 7 - Where Will Development Growth be Focused? (Paragraph 7.1 to 7.6)	0	0	3	3

Summary of Representations – main issues and suggested changes:

- Recommend policy wording relating to the capacity of water recycling centres is included in all site allocation policies (Environment Agency)
- Suggest adding reference to police facilities (Essex Police)
- Suggest change to the name of this area to better reflect its location (Dominus Chelmsford Limited).

CCC response to the comments made
Reference to the capacity of water recycling centres added to the relevant policies for affected sites at SGS7 and SGS10.
Plan text adjusted to refer to emergency services facilities.

Growth Area 1 – Central and Urban Chelmsford (paragraph 7.7-7.11 and Figure 16)

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Chelmsford Urban Area (paragraph 7.7 - 7.11 and Figure 16)	2	0	11	11

Summary of Representations – main issues and suggested changes:

- Support the approach to use brownfield land (Basildon Borough Council), the role of this area in the strategy (Gladman) and the opportunity for green/blue and natural infrastructure (Anglian Water Services Ltd)
- Suggest additional wording to ensure early discussions with developers (Anglian Water Services Ltd)
- Suggested wording changes to reflect education provision and delivery, and provision of bus services (Essex County Council)
- Additional site proposed for consideration for a co-living scheme (Highgate Capital Limited)
- Opposed to removal of car parks to allow for development

- Concern for the level of public service provision and securing promised infrastructure.

CCC response to the comments made
Support to using brownfield land noted.
Wording has been altered throughout Section 7 to clarify land and provision of primary and early years and childcare facilities, where this is a site policy requirement.
Contributions for bus services may not always be appropriate, depending on location, so this is covered through the requirement for development to maximise opportunities for active and sustainable travel for relevant site policies.
Plan is supported by an updated evidence base including an updated Infrastructure Delivery Plan.
Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes.

Location 1 – Chelmsford Urban Area (paragraph 7.12)

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Chelmsford Urban Area (paragraph 7.12)	0	0	1	1

Summary of Representations – main issues and suggested changes:

- Suggest wording changes to reflect opportunities for active and sustainable travel (Essex County Council).

CCC response to the comments made
Reference to active and sustainable travel has been included.

Strategic Growth Site Policy 1a - Chelmer Waterside

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Growth Site Policy 1a - Chelmer Waterside	4	0	9	9

Summary of Representations – main issues and suggested changes:

- Clarification sought on costs of any relocation and adequacy of width of waterside margin (Chelmsford Canoe Club)
- Suggest adding reference to police facilities (Essex Police)
- Early engagement will be required on sewer constraints (Anglian Water Services Ltd)

- Amend text to include a flood risk and management requirement and potential financial contributions (Environment Agency)
- Add reference to the role of multifunctional green infrastructure in water management (Essex County Council)
- The Cathedral School is at full capacity and would need to expand to meet demand, and a strategic approach is required (The Cathedral School)
- Additional site proposed for consideration in the allocation area, for co-living scheme (Highgate Capital Limited).

CCC response to the comments made
Reference added in the Reasoned Justification to the presence of a large diameter sewer through site CW1d.
The Policy and the Reasoned Justification have been adjusted to refer to facilities alongside infrastructure, and to police, ambulance and fire and rescue.
An additional bullet has been added for the requirement for financial contributions towards provision of a new lock and replacement weir gates.
Flood risk is covered within the Policy and at Para. 7.15.
CCC will continue to work closely with ECC as the Local Education Authority on the plan to ensure that education requirements are met.

Strategic Growth Site Policy 1w – Meadows Shopping Centre and Meadows Surface Car Park

Key statistics:

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
Strategic Growth Site Policy 1w – Meadows Shopping Centre and Meadows Surface Car Park	1	3	14	14

Summary of Representations – main issues and suggested changes:

- Additional text suggested in relation to education contributions, parking, pedestrian and cycle routes (Essex County Council)
- A Heritage Impact Assessment should be undertaken before the next consultation stage (Historic England)
- Amend text to include a flood risk and management requirement and potential financial contributions (Environment Agency)
- Suggest adding reference to police facilities (Essex Police)
- Consider sewer assets and easements, and the need for maintenance access, which should shape the layout (Anglian Water Services Ltd)
- Consider on-site health care facilities to meet growing needs (Mid and South Essex Integrated Care Board)
- Support allocation but propose greater development density and a higher number of homes (Dominus Chelmsford Limited)
- Do not agree with building homes here, it is not a sustainable option to demolish it

- Opposed to the removal of car parks to allow for development, and active travel should feature
- Concerns expressed about loss of shops and jobs, the centre has good occupancy and could be revamped for shopping
- Proposals for The Meadows should include health and education facilities.

CCC response to the comments made
Additional bullet added to the Policy and Reasoned Justification to require safeguarding of access for maintenance of foul and surface water drainage infrastructure, and the presence of a wastewater pumping station on the site.
Flood risk is covered within the Policy and through a link to Policy S10 at Para. 7.40.
Clarification made to bullet relating to loss of car parking, and enhancement of bus services.
An additional bullet has been added for the requirement for financial contributions towards provision of a new lock and replacement weir gates.
The Policy and Reasoned Justification adjusted to refer to facilities alongside infrastructure, and to police, ambulance and fire and rescue.
The site policy requires financial contributions to education provision and/or onsite provision of other community facilities including healthcare provision.
The site policy requires proposals to seek to retain an equivalent amount of commercial floorspace compared to the existing shopping centre.
Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes.

Strategic Growth Site Policy 1b – Former St Peter's College, Fox Crescent

Key statistics:

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
Strategic Growth Site Policy 1b – Former St Peter's College, Fox Crescent	1	0	9	9

Summary of Representations – main issues and suggested changes:

- Support for the policy requirement to provide or make financial contributions to sport, leisure and recreation facilities, and for commuted sums in lieu of loss of open space (Sport England)
- Add reference to police facilities (Essex Police)
- Add reference to specialised supported housing (Essex County Council)
- Change wording relating to how special schools are referred to (Essex County Council)
- Add additional text in relation to green infrastructure (Essex County Council).

CCC response to the comments made

The Policy and Reasoned Justification have been adjusted to refer to facilities alongside infrastructure, and to police, ambulance and fire and rescue.
An additional bullet has been added to outline the requirement for inclusion of 60 units of specialist residential housing.
Bullet 3 - the wording around special schools has been clarified.
Text added in relation to green infrastructure.

Strategic Growth Site Policy 1x – Former Kay Metzeler Premises, Brook Street

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Growth Site Policy 1x – Former Kay Metzeler Premises, Brook Street	2	0	7	7

Summary of Representations – main issues and suggested changes:

- The Cathedral School is at full capacity and would need to expand to meet demand, and a strategic approach is required (The Cathedral School)
- A Heritage Impact Assessment should be undertaken before the next consultation stage (Historic England)
- Add a reference to police facilities (Essex Police)
- Consider sewer assets and easements, and the need for maintenance access, which should shape the layout (Anglian Water Services Ltd)
- Add additional text in relation to green infrastructure and nature recovery networks (Essex County Council).

CCC response to the comments made
This site is no longer available for development and will not be allocated.

Strategic Growth Site Policy 1d – Riverside Ice and Leisure Land, Victoria Road

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Growth Site Policy 1d – Riverside Ice and Leisure Land, Victoria Road	2	0	11	11

Summary of Representations – main issues and suggested changes:

- The Cathedral School is at full capacity and would need to expand to meet demand, and a strategic approach is required (The Cathedral School)
- Amend text to include flood risk and management requirement and potential financial contributions (Environment Agency)
- Suggest adding reference to police facilities (Essex Police)

- Consider sewer assets and easements, and the need for maintenance access, which should shape the layout (Anglian Water Services Ltd)
- Add additional text in relation to pedestrian and cycle links, and active and sustainable travel (Essex County Council)
- Opposed to the removal of car parks to allow for development.

CCC response to the comments made
Additional bullet added to the Policy to require safeguarding of access for maintenance of foul and surface water drainage infrastructure, and the presence of a wastewater pumping station on the site.
Additional bullet added to the Policy to require provision of SuDs and flood risk management.
The Policy and Reasoned Justification have been adjusted to refer to facilities alongside infrastructure, and to police, ambulance and fire and rescue.
An additional bullet has been added for the requirement for financial contributions towards provision of a new lock and replacement weir gates.
CCC will continue to work closely with ECC as the Local Education Authority on the plan to ensure that education requirements are met.
Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes.

Strategic Growth Site Policy 1e – Civic Centre Land, Fairfield Road

Key statistics:

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
Strategic Growth Site Policy 1e – Civic Centre Land, Fairfield Road	0	0	5	5

Summary of Representations – main issues and suggested changes:

- Add reference to police facilities (Essex Police)
- Consider sewer assets and easements, and the need for maintenance access, which should shape the layout (Anglian Water Services Ltd)
- Add additional text in relation to active and sustainable travel, and Chelmsford Transport Interchange Project (Essex County Council)
- Opposed to the removal of car parks to allow for development.

CCC response to the comments made
Additional bullet added to the Policy to require safeguarding of access for maintenance of foul and surface water drainage infrastructure.
The Policy and Reasoned Justification have been adjusted to refer to facilities alongside infrastructure, and to police, ambulance and fire and rescue.
A proposed Chelmsford Transport Interchange Project is considered to be at too early a stage to be included in this iteration of the Plan.

Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes.

Strategic Growth Site Policy 1f – Eastwood House Car Park, Glebe Road

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Growth Site Policy 1f – Eastwood House Car Park, Glebe Road	0	0	5	5

Summary of Representations – main issues and suggested changes:

- Add additional text in relation to green infrastructure and nature recovery networks (Essex County Council)
- Consider sewer assets and easements, and the need for maintenance access, which should shape the layout (Anglian Water Services Ltd)
- Add reference to police facilities (Essex Police)
- Opposed to the removal of car parks to allow for development.

CCC response to the comments made
Additional bullet added to the Policy to require safeguarding of access for maintenance of foul and surface water drainage infrastructure.
The Policy and Reasoned Justification have been adjusted to refer to facilities alongside infrastructure, and to police, ambulance and fire and rescue.
Text added in relation to green infrastructure.
Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes.

Strategic Growth Site Policy 1y – Land Between Hoffmanns Way and Brook Street (Marriages Mill)

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Growth Site Policy 1y – Land Between Hoffmanns Way and Brook Street (Marriages Mill)	2	0	5	5

Summary of Representations – main issues and suggested changes:

- Add additional text in relation to green infrastructure and nature recovery networks (Essex County Council)

- Add reference to police facilities (Essex Police)
- Include reference to removal of modern buildings and retaining a link to the nearby Grade II listed Marconi 1912 Building (Historic England)
- The Cathedral School is at full capacity and would need to expand to meet demand, and a strategic approach is required (The Cathedral School).

CCC response to the comments made
The Policy and Reasoned Justification have been adjusted to refer to facilities alongside infrastructure, and to police, ambulance and fire and rescue.
Text added in relation to green infrastructure.
Bullets under 'historic and natural environment' amended to include the requirement for the removal of modern buildings, and retaining a visual link with the 1912 Building.
CCC will continue to work closely with ECC as the Local Education Authority on the plan to ensure that education requirements are met.

Policy GR1 – Growth Sites in Chelmsford City Centre/Urban Area

Key statistics:

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
Policy GR1 – Growth sites in Chelmsford City Centre/Urban Area	2	0	10	10

Summary of Representations – main issues and suggested changes:

- Support for requirements to make contributions towards new/enhanced sport, leisure and recreation facilities (Sport England)
- Add additional text in relation to active and sustainable travel, and additional bullet for sites to enhance existing pedestrian and cycle routes (Essex County Council)
- Add additional text in relation to green infrastructure and nature recovery networks (Essex County Council)
- Sustainable drainage systems should be a consideration on all proposed development sites, and aligned with green and blue infrastructure provision wherever possible (Anglian Water Services Ltd)
- Add reference to police facilities (Essex Police)
- Concerned about traffic generation in the City Centre, public transport, sustainable travel and car clubs should be considered
- Other sites could also be considered such as Andrews Place (Chelmer Housing Partnership (CHP)).

CCC response to the comments made
Policy amended to include the requirement for suitable SuDS and flood risk management.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.

The Policy and Reasoned Justification have been adjusted to refer to facilities alongside infrastructure, and to police, ambulance and fire and rescue.
Text added in relation to active and sustainable travel.
Text added in relation to green infrastructure.

Growth Site Policy 1g – Chelmsford Social Club, Springfield Road

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site Policy 1g – Chelmsford Social Club, Springfield Road	0	0	0	0

No comments.

CCC response to the comments made
No changes.

Growth Site Policy 1h – Ashby House Car Parks, New Street

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site Policy 1h – Ashby House Car Parks, New Street	0	0	1	1

Summary of Representations – main issues and suggested changes:

- Opposed to the removal of car parks to allow for development.

CCC response to the comments made
Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes.

Growth Site Policy 1i – Rectory Lane Car Park West

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site Policy 1i – Rectory Lane Car Park West	0	0	1	1

Summary of Representations – main issues and suggested changes:

- Opposed to the removal of car parks to allow for development.

CCC response to the comments made
Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes.

Growth Site Policy 1z – Granary Car Park, Victoria Road

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site Policy 1z – Granary Car park, Victoria Road	2	3	8	8

Summary of Representations – main issues and suggested changes:

- A Heritage Impact Assessment should be undertaken due to proximity to Grade II listed Springfield Water Mill (Historic England)
- The Cathedral School is at full capacity and would need to expand to meet demand, and a strategic approach is required (The Cathedral School)
- Scale of development should be much more modest due to its location, such as a small terrace to mirror existing nearby houses
- Retain site as City open space; this natural open space should be protected
- Concerns about increased strain on local infrastructure including education
- Previous proposals have not been financially viable
- Opposed to the removal of car parks to allow for development; it is a very important and convenient car park for the nearby hotel, sports events, shopping.

CCC response to the comments made
Bullet 7 amended to include layout, height and design considerations to reduce visual impact on the setting of the Grade II listed Springfield Water Mill.
The site is informed by a Heritage Impact Assessment published alongside the Preferred Options Consultation Document.
The plan is informed by a wide range of evidence base reports including an updated Infrastructure Delivery Plan, Viability Assessment, Housing Capacity in Chelmsford City Centre and Urban Area and Open Space Assessment.
CCC will continue to work closely with ECC as the Local Education Authority on the plan to ensure that education requirements are met.
Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes.

Growth Site Policy 1k – Former Chelmsford Electrical and Car Wash, Brook Street

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site Policy 1k – Former Chelmsford Electrical and Car Wash, Brook Street	0	0	0	0

No comments.

CCC response to the comments made
No changes. However, the site policy has been updated to reflect that a planning application has been submitted.

Growth Site Policy 1aa – Coval Lane Car Park

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site Policy 1aa – Coval Lane Car Park	0	1	4	4

Summary of Representations – main issues and suggested changes:

- Scale of development should be much more modest to be in keeping with surrounding development
- Concerns about increased traffic from new development
- Development should be conditional on provision of a further Park and Ride site at Widford
- Opposed to the removal of car parks to allow for development; loss of parking may impact on West End businesses; there is not enough on-street parking to accommodate the local residents' needs
- Cumulative effect of other nearby development should be considered including office to housing conversions at Paragon House.

CCC response to the comments made
The consequential change of adding SuDS and flood risk management to the over-arching Policy GR1 means that the bullet is deleted from this policy.
The plan is informed by a wide range of evidence base reports including an updated Infrastructure Delivery Plan, Viability Assessment, Transport Modelling, Housing Capacity in Chelmsford City Centre and Urban Area and Open Space Assessment.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
Policy S9 states that additional Park and Ride facilities will be considered in West Chelmsford.
Site policy already requires the development character, scale and layout to have regard and respond to the site's surrounding context.

Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes.

Growth Site Policy 1l – BT Telephone Exchange, Cottage Place

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site Policy 1l – BT Telephone Exchange, Cottage Place	0	0	0	0

No comments.

CCC response to the comments made
No changes.

Growth Site Policy 1m – Rectory Lane Car Park East

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site Policy 1m – Rectory Lane Car Park East	0	0	1	1

Summary of Representations – main issues and suggested changes:

- Opposed to the removal of car parks to allow for development.

CCC response to the comments made
Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes.

Growth Site Policy 1n – Waterhouse Lane Depot and Nursery

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site Policy 1n – Waterhouse Lane Depot and Nursery	0	0	0	0

No comments.

CCC response to the comments made
No changes.

Growth Site Policy 1o – Church Hall Site, Woodhall Road

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site Policy 1o – Chelmsford Social Club, Church Hall Site, Woodhall Road	0	0	0	0

No comments.

CCC response to the comments made
The site has been built-out as is therefore deleted from the plan.

Growth Site Policy 1p – British Legion, New London Road

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site Policy 1p – British Legion, New London Road	0	0	0	0

No comments.

CCC response to the comments made
No changes.

Growth Site Policy 1q – Land rear of 17-37 Beach's Drive

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site Policy 1q – Land rear of 17-37 Beach's Drive	0	0	1	1

Summary of Representations – main issues and suggested changes:

- Add reference to safe and convenient pedestrian and cycle access (Essex County Council).

CCC response to the comments made
Reference to safe and convenient pedestrian and cycle access added.

Additional bullet added for the layout to have regard to the presence of a wastewater pumping station on the site.

Growth Site Policy 1r – Garage Site, St Nazaire Road

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site Policy 1r – Garage Site, St Nazaire Road	0	0	1	1

Summary of Representations – main issues and suggested changes:

- Add reference to providing a safe and convenient pedestrian link (Essex County Council).

CCC response to the comments made
Reference to safe and convenient pedestrian access added.

Growth Site Policy 1bb – Glebe Road Car Park

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site Policy 1bb – Glebe Road Car Park	0	1	3	3

Summary of Representations – main issues and suggested changes:

- A Heritage Impact Assessment should be undertaken due to location in the West End Conservation Area (Historic England)
- Opposed to the removal of car parks to allow for development; this is the only overnight car park; there is already not enough parking for local residents
- Concern that overlooking and noise will be an issue.

CCC response to the comments made
The consequential change of adding SuDS and flood risk management to the over-arching Policy GR1 means that the bullet is deleted from this policy.
Bullet 4 amended to define the local context of 2-3 storeys, and that services should be screened from the streetscene.
The site is informed by a Heritage Impact Assessment published alongside the Preferred Options Consultation Document.
Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes.
Policy DM29 requires development proposals to not be overbearing or result in result in excessive noise.

Growth Site Policy 1s – Garage Site and Land, Medway Close

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site Policy 1s – Garage Site and Land, Medway Close	0	0	0	0

No comments.

CCC response to the comments made
No changes.

Growth Site Policy 1t – Car Park r/o Bellamy Court, Broomfield Road

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site Policy 1t –Car Park r/o Bellamy Court, Broomfield Road	0	0	1	1

Summary of Representations – main issues and suggested changes:

- Opposed to the removal of car parks to allow for development.

CCC response to the comments made
Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes.

Growth Site Policy 1u – Rivermead, Bishop Hall Lane

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site Policy 1u – Rivermead, Bishop Hall Lane	0	0	1	1

Summary of Representations – main issues and suggested changes:

- Add reference to provision of new bridges for safe and convenient connections to the pedestrian and cycle network (Essex County Council).

CCC response to the comments made

The site has been built-out as is therefore deleted from the plan.

Growth Site Policy 1v – Railway Sidings, Brook Street

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site Policy 1v – Railway Sidings, Brook Street	0	0	1	1

Summary of Representations – main issues and suggested changes:

- Add reference to provision of safe and convenient pedestrian and cycle routes (Essex County Council).

CCC response to the comments made
Reference to safe and convenient pedestrian and cycle access added.

Location 2 – West Chelmsford

Strategic Growth Site Policy 2 – West Chelmsford

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Growth Site Policy 2 – West Chelmsford	3	2	20	20

Summary of Representations – main issues and suggested changes:

- Add reference to ‘multifunctional’ green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Minor policy change suggested to reflect the provision of a primary school and early years nursery (Essex County Council)
- Add reference to active and sustainable modes of transport, where alternatives to the private car are prioritised, and financial contributions towards bus services (Essex County Council)
- Provide safe and convenient pedestrian and cycle connections, links to the urban area and accessibility for bus services (Essex County Council)
- Provide a safe traffic free environment around school pedestrian entrances having regard to the requirements set out in ECC’s Developers’ Guide to Infrastructure Contributions (Essex County Council)
- Support for requirements to make contributions towards new/enhanced sport, leisure and recreation facilities, and inclusion of these facilities in the masterplan (Sport England)
- Add reference to police facilities (Essex Police)

- Concerns of the impact from development on local services such as Writtle GP surgery (Good Easter Parish Council)
- Unclear what healthcare provision is envisaged as part of the proposed neighbourhood centre; a new GP surgery could be provided here (Good Easter Parish Council)
- Concerns about the potential traffic impact on Roxwell Road/A1060, a proportion of the traffic should be able to use Chignall Road via Trent Road/Avon Road (Good Easter Parish Council)
- The proposed multi-user crossing will cause further congestion, although its purpose and intended users is not clear (Good Easter Parish Council)
- Buses will be delayed by traffic queues without space to provide a bus lane
- The commitment to CIL funding is welcome, and assurance is sought that this will not change in future (Writtle Parish Council).

CCC response to the comments made
Text relating to provision of education has been updated to reflect ECC requirements, and types of provision have been clarified.
Reference to traffic free environments around school entrances are considered too detailed for the Policy but would be dealt with at masterplanning or planning application stage.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
Provision of a new stand-alone early years and childcare nursery removed from supporting on-site development and site infrastructure requirements to reflect latest ECC position regarding need.
Requirement for pedestrian and cycle connections expanded to ensure these are ‘safe and convenient’.
Additional requirements for a ‘new dedicated pedestrian and cycle links to the existing urban area’ and the need to ‘provide well-connected and integrated internal road layouts which allow good accessibility for bus services’ added to policy to reflect the removal of a bus link via Avon Road.
Policy and Reasoned Justification updated to expand reference to ‘multifunctional’ green infrastructure to ensure consistency across the Plan.
Policy and Reasoned Justification updated to expand reference to ‘active and’ sustainable transport to ensure consistency across the Plan.
Site infrastructure requirements updated to include reference to Police, ambulance and fire and rescue facilities.
The necessary contributions to healthcare are covered by site infrastructure requirements. Full details of what these may be will be informed through the planning application process and advice of NHS Mid and South Essex Integrated Care Board.

<u>Location 3 – East Chelmsford</u>

<u>Strategic Growth Site Policy 3a – East of Chelmsford, Manor Farm</u>

Key statistics:

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**

Strategic Growth Site Policy 3a – East of Chelmsford, Manor Farm	2	1	16	16

Summary of Representations – main issues and suggested changes:

- Support policy requirements including for development to provide or make financial contributions to new or enhanced sport, leisure and recreational facilities (Sport England)
- Add to policy requirements for a foul drainage strategy and SuDs as part of a multifunctional green and blue infrastructure delivery framework should an alternative development strategy be taken forward for this site (Anglian Water Services Ltd)
- Support the allocation ((Hopkins Homes Ltd)
- Para. 7.135 – The site has no existing or planned access for horse riders and any proposals could conflict with the residential area and country park users (Hopkins Homes Ltd)
- Do not support Para. 7.141 - Requirement for a Minerals Resource Assessment is inconsistent with Policy S8 of the Minerals Local Plan which exempts land already allocated in adopted plans (Hopkins Homes Ltd)
- Ensure any need for minerals extraction is factored into the housing trajectory to allow for the potential delays to delivery (Hopkins Homes Ltd)
- In absence of any justification, with reference to the CIL Regulations, delete the requirement to fund the creation of a visitors' centre at Sandford Mill (Hopkins Homes Ltd)
- Requirements for financial contributions for education, community and healthcare, sports, leisure and recreation duplicate S9 and S10. If retained in the policy, amend to state that contributions will be “appropriate and proportionate” (Hopkins Homes Ltd)
- A new plan policy is required to address the cumulative recreational pressure on Blakes Wood and Lingwood Common SSSI, Woodham Walter Common SSSI, Danbury Common SSSI and other wildlife sites from increased levels of recreational pressure arising from the new residents at Growth Sites 16a, 3a and 13 (Natural England)
- Add to SGS3a and d policies that active travel connections should be to existing and proposed development areas within East of Chelmsford and at East Chelmsford Garden Community (Wates Developments and Hammonds Estates LLP)
- Expand SGS3a and d to require appropriate measures to enable public transport access to and from the site, and to ensure public transport strategy proposals integrate with existing and proposed development areas within East Chelmsford and at the East Chelmsford Garden Community (Wates Developments and Hammonds Estates LLP)
- Amend Historic and Natural Environment, bullet 4 to refer to ‘multifunctional’ green infrastructure (Essex County Council)
- Amend Movement and Access bullet to refer to ‘safe and convenient’ pedestrian and cycle connections (Essex County Council)

- Amend Site infrastructure requirements bullet 7 to 'Provision of a new northwest safe and convenient pedestrian/cycle link through the Country Park to provide a connection to future off-site cycle links.' (Essex County Council)
- For consistency with other parts of the plan refer to `active and sustainable travel' in para. 1 of the policy (Essex County Council)
- Object to site for multiple reasons including potential contamination of land, flood risk, housing density and positioning, education and medical care, biodiversity and traffic impacts (Great Baddow Parish Council)
- Under 'Site infrastructure requirements' expand bullet point 10 to refer to police facilities as required by Essex Police (Essex Police)
- Support proposal to improve the cycle crossing of the River Chelmer at Sandon Mill (Cycling UK)
- Include requirement for a more direct cycle route to the city centre which follows Essex Yeomanry Way to the Army and Navy (Cycling UK)
- It appears that the extension to Sandon Park and Ride is now intended to serve Hammonds Farm development
- The SGS3a masterplan should consider pollution sampling from the former nearby landfill site and the nuclear bunker
- The Local Plan is undermined by speculative applications such as the proposed warehouse development at Sandon
- There aren't enough trained professionals to staff the new infrastructure needed e.g. schools
- Unsustainable to build new homes close to the flood plain adjacent to the Army and Navy
- Proposed new developments will increase flooding potential.

CCC response to the comments made
Policy S9 already requires developments to provide foul drainage infrastructure.
The site policy already requires flood mitigation measures including SuDS.
Various site policy adjustments have been made including deletion of horse-riding reference as there are no existing or planned access points for horse riders; new requirements to address the cumulative recreational pressure on nearby SSSIs; new requirement for multifunctional green infrastructure; new requirements for active and sustainable travel and connections with East Chelmsford Garden Community and, new requirement for financial contributions towards Police, ambulance and fire and rescue facilities.
Requirements for financial contributions are informed by the plan evidence base including the updated Infrastructure Delivery Plan.
A Minerals Resource Assessment remains a policy requirement.
The plan is informed by a wide range of evidence including a Strategic Flood Risk Assessments and Sequential and Exception Testing.
The Council cannot prevent planning applications from being submitted.
The site already has an approved masterplan.
The site policy already requires safe and convenient pedestrian and cycle connections.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.

Strategic Growth Site Policy 3b – East of Chelmsford, Land North of Maldon Road (Employment)

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Growth Site Policy 3b – East of Chelmsford, Land North of Maldon Road (Employment)	0	0	10	10

Summary of Representations – main issues and suggested changes:

- Expand policy to require the development to prepare a strategy for responding to the National Grid Electricity Transmission plc (NGET) overhead transmission lines within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design (National Grid Electricity Transmission)
- Under 'Site infrastructure requirements' expand bullet point 5 to refer to police facilities as required by Essex Police (Essex Police)
- Replace Site Infrastructure Requirements, bullet 1 with 'New 56 place stand-alone early years and childcare nursery (Use Class E(f)) on 0.13 hectares of suitable land allocated for education and childcare use (Essex County Council)
- Support allocation (Redrow Homes & Speakman Family)
- Amend Movement and Access bullet 3 to refer to 'safe and convenient' pedestrian and cycle connections (Essex County Council)
- Amend para. 7.151 to refer to 'safe and convenient cycle/footway' (Essex County Council)
- Amend Historic and Natural Environment, bullet 3 to refer to 'multifunctional' green infrastructure (Essex County Council).

CCC response to the comments made
Various site policy adjustments have been made including a new requirement to prepare a strategy for responding to the National Grid Electricity Transmission plc (NGET) overhead transmission lines; revised requirement for a 56 place stand-alone early years and childcare nursery; new requirement for multifunctional green infrastructure, and new requirements for active and sustainable travel connections and, new requirement for financial contributions towards Police, ambulance and fire and rescue facilities.

Strategic Growth Site Policy 3c – East of Chelmsford, Land South of Maldon Road

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses

Strategic Growth Site Policy 3c – East of Chelmsford, Land South of Maldon Road	0	0	5	5

Summary of Representations – main issues and suggested changes:

- Amend Movement and Access bullet 3 to refer to ‘safe and convenient’ pedestrian and cycle connections (Essex County Council)
- Given that SGS3c and SGS3d are at planning application stage, the policy should not include additional infrastructure requirements e.g., a Pegasus crossing unless some flexibility is given (Redrow Homes & Speakman Family)
- Support allocation, but expand the site allocation (Redrow Homes & Speakman Family)
- Object to site for multiple reasons including potential contamination of land, flood risk, housing density and positioning, education and medical care, biodiversity and traffic impacts (Great Baddow Parish Council).

CCC response to the comments made
Various site policy adjustments have been made including new requirements for safe and convenient pedestrian and cycle connections.
It is right that the site policy has been updated since the adoption of the Local Plan. Requirements are informed by the plan evidence base including the IDP.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
Objections to the site are noted. The plan allocation is rolled over from the adopted plan and is supported by evidence. Matters such as housing positioning are considered at planning application stage.

Strategic Growth Site Policy 3d – East of Chelmsford, North of Maldon Road

Key statistics:

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
Strategic Growth Site Policy 3d – East of Chelmsford, North of Maldon Road	0	0	6	6

Summary of Representations – main issues and suggested changes:

- Amend Movement and Access bullet 3 to refer to ‘safe and convenient’ pedestrian and cycle connections (Essex County Council)
- Amend para. 7.176 to read 'A safe and convenient cycle/footway should connect the site to Sandon Park and Ride to the east to maximise use of the existing Park and Ride site (Essex County Council)
- Amend Historic and Natural Environment, bullet 3 to refer to ‘multifunctional’ green infrastructure (Essex County Council)

- Support allocation but given that SGS3c and SGS3d are at planning application stage, the policy should not include additional infrastructure requirements e.g., a Pegasus crossing unless some flexibility is given (Redrow Homes & Speakman Family).

CCC response to the comments made
Various site policy adjustments have been made including requirements for safe and convenient cycle/footway connections and multifunctional green infrastructure.
It is right that the site policy has been updated since the adoption of the Local Plan. Requirements are informed by the plan evidence base including the IDP.

Location 4 – Growth Site Policy 4 – Land North of Galleywood Reservoir

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site Policy 4 – Land North of Galleywood Reservoir	0	0	4	4

Summary of Representations – main issues and suggested changes:

- For consistency with other parts of the plan, strengthen references to active travel in policy and para 7.190 (Essex County Council)
- Policy text should require multifunctional green infrastructure (Essex County Council).
- The viability and deliverability of this site is questioned as it has been allocated for over four years (Park View Group).

CCC response to the comments made
Policy adjustments include strengthened requirements for safe and convenient pedestrian and cycle connections and to provide multifunctional green infrastructure.
The site has planning permission and is expected to be delivered between 2025 and 2026.

Location 5 – Growth Site Policy 5 – Land Surrounding Telephone Exchange, Ongar Road, Writtle

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site Policy 5 – Land Surrounding Telephone Exchange, Ongar Road, Writtle	1	0	4	4

Summary of Representations – main issues and suggested changes:

- Support allocation. The site is expected to be surplus to operational requirements (as a telephone exchange) by 2031. Adjust boundary to fully reflect our land ownership and ensure deliverability (Telereal Securitised Property GP Limited)
- Use a minimum or indicative capacity of 25 to enable a future planning application to determine the exact quantum, layout, form, mix and tenure of new homes (Telereal Securitised Property GP Limited)
- Amend policy to enable a future planning application to be informed by an arboricultural impact assessment with regards to the potential retention of trees on site (Telereal Securitised Property GP Limited)
- Policy text in relation to infrastructure requirements should be modified to be appropriate and proportionate (Telereal Securitised Property GP Limited)
- For consistency with other policies, amend to strengthen references to active travel (Essex County Council)
- Split bullet 1 under Site Development Principles into two for consistency with other site policies (Essex County Council)
- Policy text should require multifunctional green infrastructure (Essex County Council).

CCC response to the comments made
Site boundary has been reduced to reflect the land promoted for development.
The use of the 'around' housing figure would allow for a higher density development to be brought forward where this conforms with other policies in the Plan as a whole.
Various site policy adjustments have been made including requirements for safe and convenient cycle/footway connections, to provide multifunctional green infrastructure, to provide new and enhanced cycle routes and footpaths where appropriate, and to include reference to an arboricultural impact assessment.

Growth Area 2 – North Chelmsford (paragraphs 7.200-7.205 and Figure 17)

Key statistics:

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
Growth Area 2 – North Chelmsford (paragraphs 7.200-7.205 and Figure 17)	2	1	9	9

Summary of Representations – main issues and suggested changes:

- Support for the importance of North East Chelmsford and Chelmsford Garden Community in delivering significant levels of growth (Cliffords Group Ltd, Daniel James Developments)
- Support for inclusion of Little Boyton Hall (C J H Farming Ltd)
- Excluding development at Boreham is a missed opportunity (Gladman)

- There is currently no right of way through the Green Wedge from Broomfield, so reference to this should be removed (Broomfield Parish Council).

CCC response to the comments made
It is appropriate to retain the reference to using the Green Wedge for sustainable travel to reflect local aspirations for active travel connectivity.
Figures have been updated to reflect the revised Spatial Strategy.
Development in Boreham village has been considered but rejected due to for example, the impact on the local road network and landscape capacity and sensitivity concerns.

Location 6 – North East Chelmsford (Chelmsford Garden Community)

Strategic Growth Site Policy 6 – North East Chelmsford (Chelmsford Garden Community)

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Growth Site 6 – North East Chelmsford Garden Community	7	0	31	31

Summary of Representations – main issues and suggested changes:

- Support for the policy (Cliffords Group Ltd, Hallam Land Management)
- Support the policy subject to detailed proposed amendments to wording including replacing 20% biodiversity with 10%, and replacing a new Country Park with three new destination parks and (Vistry Group, Chelmsford Garden Community Consortium)
- Support for measures to encourage physical activity and new or enhanced sport, leisure and recreation facilities (Sport England)
- Support for the inclusion of a country park and green infrastructure, and 20% BNG (Natural England)
- An assessment of what is being provided as suitable alternative natural greenspace is needed (Natural England)
- The distinction between public green spaces and wildlife habitats could be made, with greater focus on integrating biodiversity rather than segregation; planting and biodiversity features should use native species; and would like riparian corridors to maintain a buffer zone for public space rather than private gardens (Environment Agency)
- Ensure that sufficient flood risk measures are incorporated and, where possible, as part of multi-functional green and blue infrastructure; and nature based solutions to provide environmental gains, rather than carbon intensive ‘grey infrastructure’ mitigation (Anglian Water Services Ltd)
- Refer to ‘multifunctional’ green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Make a reference to active and sustainable travel (Essex County Council)

- Strengthen the supporting text to reference the importance of the innovation park, the critical success factors needed, skills and the employment mix (Essex County Council)
- Clarify the wording relating to the quantity and type of education provision (Essex County Council)
- Provide a safe traffic free environment around school pedestrian entrances having regard to the requirements set out in ECC's Developers' Guide to Infrastructure Contributions (Essex County Council)
- Policy should require renewable and low carbon energy schemes, rather than just encourage them (Essex County Council)
- Stewardship principles are supported. Add additional bullets requiring stewardship activities to be in place for the first housing occupations and for an Asset Schedule of ownership and responsibility for community assets to be prepared (Essex County Council)
- Add to the end of para. 7.216 "Appropriate funding will also need to be made for police facilities to provide for community safety, cohesion and policing as required by Essex Police." (Essex Police)
- Ten Gypsy and Traveller plots have already been provided through the adopted Local Plan; there is now sufficient provision within this community, and it would be desirable to consider locations elsewhere (Chelmsford Garden Community Council)
- Additional land proposed at Domsey Lane, Cranham Road, and Wheelers Hill (Daniel James Developments, Hallam Land Management).

CCC response to the comments made
The Policy and Reasoned Justification have been adjusted to refer to facilities alongside infrastructure, and to police, ambulance and fire and rescue.
Text relating to provision of education has been updated to reflect ECC requirements, and types of provision have been clarified. Reference to traffic free environments around school entrances are considered too detailed for the Policy but would be dealt with at masterplanning or planning application stage.
The distinction between public green spaces and wildlife habitats is now covered by updates to Policy DM16; but has also been added to the Reasoned Justification for this policy.
Policy amended to include reference to capacity for wastewater treatment and disposal, and safeguarding of access for the maintenance of foul and surface water drainage infrastructure.
References to safe and convenient travel have been included.
Reference to multifunctional green infrastructure has been added.
The references to country parks have been replaced with Destination Parks.
Stewardship requirements have been clarified, but an asset schedule will be part of stewardship arrangements and does not need to be included in the Policy.
Travelling Showpeople provision is now required instead of Gypsy and Traveller provision, in line with the revised Spatial Strategy.
Referring to only 10% BNG for new Garden Communities would be inconsistent with Policy DM16, which requires 20% BNG on these sites. The Local Plan is supported by the plan evidence base including an updated Viability Assessment.
A number of initiatives are underway in relation to employment uses and labour and skills, the suggested amendments are considered too detailed for this Policy.

The encouragement of appropriate development of renewable, low carbon and decentralised energy schemes within the site policy has been amended to state where these are deliverable and do not give rise to environmental or other amenity impacts. However, this remains something that will be encouraged and not required as there is insufficient evidence or policy to require this on site.

Location 7 – Great Leighs

Strategic Growth Site Policy 7a – Great Leighs – Land at Moulsham Hall

Consultation point	Yes	No	Comments	Total number of responses
Strategic Growth Site 7a – Great Leighs – Land at Moulsham Hall	2	3	19	19

Summary of Representations – main issues and suggested changes:

- Support for the policy (Environment Agency)
- Policy requirement to provide or make financial contributions to new or enhanced sport, leisure and recreational facilities is welcomed (Sport England)
- Policy change suggested to reflect Essex Police (Essex Police)
- Make reference to 'multifunctional' green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Policy change suggested to clarify wording for the primary school provision and childcare facilities (Essex County Council)
- Provide additional safe and convenient pedestrian and cycle connections to Great Leighs village, and ensure good accessibility for buses (Essex County Council)
- Add a reference to active and sustainable travel (Essex County Council)
- Provide a safe traffic free environment around school pedestrian entrances having regard to the requirements set out in ECC's Developers' Guide to Infrastructure Contributions (Essex County Council)
- There are woodlands on or in proximity to several allocations including those at Great Leighs, including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Decisions should be made in line with paragraph 186 (c) of the NPPF. Council is also referred to information in Natural England and Forestry Commission's Standing Advice on Ancient Woodland (Forestry Commission England)
- Phasing conditions may be needed to align development with Anglian Water's investment plans (Environment Agency)
- The policy does not mention the site location is within the RAMS zone of influence, meaning that an assessment of suitable alternative natural greenspace may be needed (Natural England)
- Clarify wording in relation to the capacity of Great Leighs Water Recycling Centre (Anglian Water)
- Further land is promoted adjacent to the site (Harris Strategic Land Ltd)

- The policy should include a clear requirement for buffer habitat to protect the Essex Wildlife Trust Phyllis Currie Nature Reserve and a financial contribution towards mitigating increased recreational impacts (Essex Wildlife Trust).

CCC response to the comments made
Policy wording has been amended to clarify the requirement for sufficient wastewater capacity and disposal. This leaves the reference to phasing conditions, and further references to constraints, as unnecessary.
Text relating to provision of education has been updated to reflect ECC requirements, and types of provision have been clarified. Reference to traffic free environments around school entrances are considered too detailed for the Policy but would be dealt with at masterplanning or planning application stage.
Requirement for pedestrian and cycle connections expanded to ensure these are 'safe and convenient'.
Policy and Reasoned Justification updated to expand reference to 'multifunctional' green infrastructure to ensure consistency across the Plan.
Policy and Reasoned Justification updated to expand reference to 'active and' sustainable transport to ensure consistency across the Plan.
Site infrastructure requirements updated to include reference to Police, ambulance and fire and rescue facilities.
The requirement for a habitat buffer is already covered by the Policy and Reasoned Justification.
The requirement for RAMS contributions has been removed from all site policies and is covered by Policy S4 and DM16. Policy S4, S9 and DM16 collectively cover an updated requirement for relevant major developments to provide suitable alternative and accessible natural greenspace on-site, in addition to financial contributions in accordance with the adopted RAMS Supplementary Planning Document – no change considered necessary to the site policy.
Policies S4 and DM17 protects sites of international, national, regional and local nature conservation importance including Ancient Woodlands.

Strategic Growth Site Policy 7b – Great Leighs – Land East of London Road

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
Strategic Growth Site 7b – Great Leighs – Land East of London Road	0	0	12	12

Summary of Representations – main issues and suggested changes:

- Add a reference to active and sustainable travel, and that bus enhancements should be funded by the developer (Essex County Council)
- Provide additional safe and convenient pedestrian and cycle connections to Great Leighs village, especially for older persons (Essex County Council)
- Add reference to 'multifunctional' green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Seek clarification on the affordable housing and specialist residential accommodation mix (Essex County Council)

- Policy changes suggested to reflect Essex Police (Essex Police)
- There are woodlands on or in proximity to several allocations including those at Great Leighs, including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Decisions should be made in line with paragraph 186 (c) of the NPPF. Council is also referred to information in Natural England and Forestry Commission's Standing Advice on Ancient Woodland (Forestry Commission England)
- Phasing conditions may be needed to align development with Anglian Water's investment plans (Environment Agency)
- Clarify wording in relation to the capacity of Great Leighs water recycling centre (Anglian Water)
- The policy does not mention the site location is within the RAMS zone of influence, meaning that an assessment of suitable alternative natural greenspace may be needed (Natural England).

CCC response to the comments made
Policy wording has been amended to clarify the requirement for sufficient wastewater capacity and disposal. This leaves the reference to phasing conditions, and further references to constraints, as unnecessary.
Requirement for pedestrian and cycle connections expanded to ensure these are 'safe and convenient'.
Policy and reasoned Justification updated to expand reference to 'multifunctional' green infrastructure to ensure consistency across the Plan.
Site infrastructure requirements updated to include reference to Police, ambulance and fire and rescue facilities.
Policy and reasoned Justification updated to expand reference to 'active and' sustainable transport to ensure consistency across the Plan.
The policy sets out that the site will be required to provide affordable housing - no change considered necessary to the site policy.
The requirement for RAMS contributions has been removed from all site policies and is covered by Policy S4 and DM16. Policy S4, S9 and DM16 collectively cover an updated requirement for relevant major developments to provide suitable alternative and accessible natural greenspace on-site, in addition to financial contributions in accordance with the adopted RAMS Supplementary Planning Document – no change considered necessary to the site policy.
Policies S4 and DM17 protects sites of international, national, regional and local nature conservation importance including Ancient Woodlands.

Strategic Growth Site Policy 7c – Great Leighs – Land North and South of Banters Lane

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
Strategic Growth Site 7c – Great Leighs – Land North and South of Banters Lane	0	1	13	13

Summary of Representations – main issues and suggested changes:

- Support for the allocation (Landvest and Harding Homes)
- Add a reference to active and sustainable travel, and that bus enhancements should be funded by the developer (Essex County Council)
- Provide additional safe and convenient pedestrian and cycle connections to Great Leighs village, especially for older persons (Essex County Council)
- Add a reference to 'multifunctional' green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Policy change suggested to reflect Essex Police (Essex Police)
- There are woodlands on or in proximity to several allocations including those at Great Leighs, including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Decisions should be made in line with paragraph 186 (c) of the NPPF. Council is also referred to information in Natural England and Forestry Commission's Standing Advice on Ancient Woodland (Forestry Commission England)
- Clarify wording in relation to the capacity of Great Leighs Water Recycling Centre (Anglian Water)
- Phasing conditions may be needed to align development with Anglian Water's investment plans (Environment Agency)
- The policy does not mention the site location is within the RAMS zone of influence, meaning that an assessment of suitable alternative natural greenspace may be needed (Natural England).

CCC response to the comments made
Policy wording has been amended to clarify the requirement for sufficient wastewater capacity and disposal. This leaves the reference to phasing conditions, and further references to constraints, as unnecessary.
Requirement for pedestrian and cycle connections expanded to ensure these are 'safe and convenient'.
Policy and reasoned Justification updated to expand reference to 'multifunctional' green infrastructure to ensure consistency across the Plan.
Site infrastructure requirements updated to include reference to Police, ambulance and fire and rescue facilities.
Policy and reasoned Justification updated to expand reference to 'active and' sustainable transport to ensure consistency across the Plan.
Reasoned Justification amended to include any enhancements to bus services required to support the site needing to be funded by the developer.
The requirement for RAMS contributions has been removed from all site policies and is covered by Policy S4 and DM16. Policy S4, S9 and DM16 collectively cover an updated requirement for relevant major developments to provide suitable alternative and accessible natural greenspace on-site, in addition to financial contributions in accordance with the adopted RAMS Supplementary Planning Document – no change considered necessary to the site policy.
Policies S4 and DM17 protects sites of international, national, regional and local nature conservation importance including Ancient Woodlands.

<u>Location 8 – Strategic Growth Site Policy 8 – North of Broomfield</u>

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Location 8 – Strategic Growth Site Policy 8 – North of Broomfield	7	0	33	33

Summary of Representations – main issues and suggested changes:

- Requirement to provide or make financial contributions to new or enhanced sport, leisure and recreational facilities and providing a coherent network of public open space, formal and informal sport, recreation and community space within the site is welcomed (Sport England)
- Address the missing link between Goulton Road and the start of the segregated cycle tracks on Broomfield Road as the current situation is a major barrier to active travel between the site and the city centre (Cycling UK)
- Need more religious facilities/community spaces including for Muslim population in North Chelmsford (Essex Muslim Centre)
- Policy change suggested to add ‘and police facilities as required by Essex Police’ (Essex Police)
- Refer to a robust traffic strategy for the local road network, in lieu of the hospital access road and to add flexibility about how the new health care facility could be achieved (Broomfield Parish Council)
- For consistency with other parts of the plan, strengthen references to active travel and refer to ‘safe and convenient’ pedestrian and cycle connections (Essex County Council)
- Amend to reflect ECC’s preferred wording for ‘new 56 place stand-alone early years and childcare nursery (Use Class E(f)) on 0.13 hectares of suitable land allocated for education and childcare use’, and refer to ‘nursery’ rather than ‘nursery school’ in supporting text (Essex County Council)
- Refer to `multifunctional’ green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Add individual bullets requiring financial contributions to the North East Bypass and education (Essex County Council)
- Amend reference to ‘good accessibility for buses’ rather than ‘bus priority measures’ (Essex County Council)
- The requirement for a health care facility could be met by a contribution for delivery on an alternative site (Broomfield Parish Council)
- Some allocations have woodland on/near to the site including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Proposals should reduce any impact on irreplaceable habitat. Decisions should reference Natural England and Forestry Commission’s Standing Advice on Ancient Woodland – plus supporting Assessment Guide and “Keepers of Time” – Ancient and Native Woodland and Trees Policy in England (Forestry Commission England).

CCC response to the comments made
Various site policy adjustments have been made including reference to active and sustainable travel, multifunctional green infrastructure, financial contributions towards Police, ambulance and fire and rescue facilities and good accessibility for

bus services. Amended requirement for financial contributions to delivery of Section 1a of the Chelmsford North East Bypass.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
Mitigation measures for the impact of development on the Main Road corridor will be included within a traffic assessment at planning application stage.
An alternative solution to delivering a healthcare facility is not relevant to the site allocation and would require a separate planning application.
Site policy already requires provision of pedestrian and cycle connections.
There are no specific proposals for a religious facility on this site. Policies and S9 and DM20 support the development of community facilities within the plan area.
The site policy includes requirements for a woodland buffer. Policies S4 and DM17 protects sites of international, national, regional and local nature conservation importance including Ancient Woodlands.

Location 9 – Growth Site Policy 9a – Waltham Road Employment Area

Key statistics:

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
Location 9 – Growth Site Policy 9a – Waltham Road Employment Area	1	11	16	16

Summary of Representations – main issues and suggested changes:

- Support for the allocation which is in a suitable location and complimentary to the existing provision with no known constraints (LVJ Maldon Limited)
- The use of ‘around’ 3,500sqm is supported but flexibility is needed so that further land can be included to meet employment needs. Boundary should be enlarged to include land to the north (LVJ Maldon Limited)
- Designated heritage assets in and outside the Boreham Roman Road/Plantation Road Conservation Area are unlikely to be impacted (Historic England)
- For consistency with other parts of the plan, strengthen references to active travel in the policy (Essex County Council)
- The existing employment area is a bad example of town planning, an eyesore with larger industrial type operations and in an inappropriate location for employment space, and this proposal would make it worse (Boreham Conservation Society)
- Any additional highway works would adversely infringe on the rural setting of this country road
- Concern over the loss of prime agricultural land, increased flood risk and that the site lacks mains utilities (Boreham Conservation Society)
- Concerns it would generate additional traffic movements through Boreham (already approaching capacity) on top of those already proposed due to the A12 widening scheme (Boreham Conservation Society)

- Existing cycle and walkways are poorly maintained (Boreham Conservation Society)
- The size boundary appears much larger than necessary so could lead to uncontrolled development
- The proposal contradicts ECC's Boreham Traffic Mitigation Scheme
- The planned solar farm development and train station would generate additional traffic movements on top of those from this site
- The proposal would ruin the countryside adjacent to a local wildlife site
- Would lead to increased pollution, the existing employment area is already a nuisance to neighbours
- The existing employment area does not benefit the local community as occupiers are mainly large operators and all employees must travel by car.

CCC response to the comments made
The site allocation, quantum and boundary are supported by the plan evidence base including the Heritage Impact Assessment, traffic modelling, Strategic Flood Risk Assessment and Employment Land Review – no changes proposed.
Waltham Road Employment Area is a well-established site and its expansion will provide further rural inward investment opportunities and also reflect the aspirations of national policy to support the sustainable growth and expansion of business in rural areas.
Site policy adjusted to require safe and convenient pedestrian and cycle links.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.

Location 14 – Ford End

Growth Site 14a – Land West of Back Lane, Ford End

Key statistics:

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
Growth Site 14a – Land West of Back Lane, Ford End	1	17	20	20

Summary of Representations – main issues and suggested changes:

- Ford End is within Great Leighs Water Recycling Centre catchment area which has some capacity to accommodate flows from small scale growth. There are no Anglian Water assets within the indicated areas for growth at Ford End (Anglian Water)
- A Heritage Impact Assessment (HIA) would be beneficial to identify any necessary mitigation and enhancement measures. Amend policy is require a Heritage Impact Assessment with a planning application (Historic England)
- Object to the allocation. Concerns include access, flooding, heritage impacts and neighbour amenity (Great Waltham Parish Council)
- Policy changes suggested relating to education provision (Essex County Council)
- Support the allocation expressed

- Concerns expressed relating to loss of Grade 2 agricultural land, impacts on heritage assets, flood risk, limited pedestrian and cycle connections to the site and, noise, air and light pollution
- Proposal will increase traffic and congestion, previous requests for road calming measures were rejected by Essex Highways
- Lack of existing infrastructure to support the development including a suitable road network, local shops, school and utility capacity and public transport
- Unsuitable/unsafe access and egress to the site, including roads being too narrow for vehicles and pedestrians
- Concerns over impacts on settlement character and countryside
- The development will not contribute to the local economy
- There more suitable sites within the vicinity as set out in the SHELAA
- Impact on neighbour amenity owing to (amongst other matters) the ground levels being higher at the allocation site.

CCC response to the comments made
Following further consideration, this site has been removed from the plan and it is no longer considered deliverable given existing site constraints including poor pedestrian access and impact on heritage assets.
Heritage Impact Assessments were published alongside the Preferred Options Local Plan and have been used to inform site allocation policies.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.

Growth Site 14b – Land South of Ford End Primary School

Key statistics:

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
Growth Site 14b – Land South of Ford End Primary School	2	18	24	24

Summary of Representations – main issues and suggested changes:

- Support but allocate the whole site (5.37ha) for around 50 homes. This would deliver substantial benefits (Dandara Eastern)
- Support and consider a greater quantum on a single site rather than Growth Site 14a (Great Waltham Parish Council)
- Development should include appropriate access arrangements, traffic management, and mitigation and contributions towards education (Great Waltham Parish Council)
- Development would not affect any designated heritage assets (Historic England)
- Ford End is within Great Leighs Water Recycling Centre catchment area which has some capacity to accommodate flows from small scale growth. There are no Anglian Water assets within the indicated areas for growth at Ford End (Anglian Water)

- Policy changes suggested relating to education provision (Essex County Council)
- Support expressed for site
- Concerns expressed relating to loss of Grade 2 agricultural land, impacts on heritage assets, flood risk and drainage, limited pedestrian and cycle connections to the site and, noise, air and light pollution
- Proposal will increase traffic and congestion, previous requests for road calming measures were rejected by Essex Highways
- Lack of existing infrastructure to support the development including a suitable road network, local shops, school and utility capacity and public transport
- Unsuitable/unsafe access and egress to the site, including roads being too narrow for vehicles and pedestrians
- Concerns over impacts on settlement character and countryside
- The development will not contribute to the local economy
- There more suitable sites within the vicinity as set out in the SHELAA
- Impact on neighbour amenity owing to (amongst other matters) the ground levels being higher at the allocation site.
- The development will conflict with the school's current access arrangements, impacting on the safety of children
- Concerns that houses will overlook the school and impact on the safety of children.

CCC response to the comments made
The site allocation is supported by the plan evidence base including Strategic Flood Risk Assessments, Water Cycle Studies, Landscape Sensitivity and Capacity Study, new Air Quality Assessment and traffic modelling. The Small Sites Planning Briefs/Concept Framework 2024 considers that there are no overriding site constraints which mean that the site is unsuitable or undeliverable.
The 'small sites' (under 1ha) are an important part of the Plan to ensure delivery of a variety of sites in a timely manner, and to meet NPPF requirements to provide 10% of small sites. The enlargement of these sites would be likely to put greater pressure on local facilities and infrastructure which could make such sites unsuitable for development.
This allocation will provide housing on a site no larger than one hectare to help meet requirements in national planning policy - the site boundary is acceptable.
The site policy sets our development principles including access arrangements and infrastructure requirements including contributions towards education.
The use of the 'around' housing figure would allow for a higher density development to be brought forward where this conforms with other policies in the Plan as a whole.
The Reasoned Justification has been amended to recognise that speeding by vehicles on Main Road (B1008) is an issue and as such traffic calming should be provided as part of the development including speed reduction measures.
Ford End is a Service Settlement with a primary school and bus service making it suitable for small scale development.
The allocation will help to support the services and facilities in the village and help to maintain a diverse housing supply.
The site policy requires appropriate active and sustainable travel connections to be provided within the site with links into the wider network, including the primary

school. It also includes provision for appropriate improvements, as necessary, to the local and strategic road network.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
The plan has been changed to recognise that there is limited parking and drop-off at the primary school and that future access arrangements into the development site could exacerbate this issue. Therefore, the plan provides a new area of parking for the primary school's use adjacent to the site allocation. This is shown on the Draft Policies Map.
The site policy has been expanded to require development to be set back from Main Road (B1008) and to restrict the height of new development to two-storey.
The site policy requires the development to be appropriate to the character of the area.
To meet our development needs it is inevitable that some agricultural land will be used for development.

Location 15 – Little Boyton Hall Farm Employment Area

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Location 15 – Little Boyton Hall Farm Employment Area	2	1	8	8

Summary of Representations – main issues and suggested changes:

- Existing and prospective tenants support the proposal. They respect for example, the location, provision of parking and landscaping (Christopher Philpot)
- Support but amend policy to optimise flexibility and deliverability of the site for example by removing the need for a masterplan or changing the timing of when it is required (CJH Farming Ltd)
- Expand the range of uses that can come forward, provide a flexible site capacity, and expand the allocation boundary (CJH Farming Ltd)
- Grade II listed Little Boyton Hall is adjacent to the site but impacts are considered unlikely. Amend policy text to ensure it is protected (Historic England)
- Add additional text in relation to green infrastructure (Essex County Council)
- For consistency with other parts of the plan, strengthen references to active travel (Essex County Council)
- Concerns expressed including loss of agricultural land, site is unsustainable, will be harmful to the landscape and adversely impact on views from the north which is largely ignored by the consultant (Chignal Parish Council)
- The site is near an Ancient Woodland. Consider direct and indirect effects of development during the construction and operational phases (Forestry Commission England)
- The site is very tranquil, is poorly served by public transport and difficult to cycle to, hence most users will drive

- Whilst the site is intended to be served from the A1060, occupiers might access from Chignal/Mashbury/High Easter where the lanes are in a very poor condition.

CCC response to the comments made
The plan requires masterplans all Strategic Growth Sites to inform the planning application process and to help ensure that the resulting development is amongst other considerations well designed and high quality.
The type of employment floorspace to be provided will help meet future needs as identified in the Employment Land Review 2024.
The site policy includes protection for the setting of Little Boyton Hall Grade II Listed Building.
Amendments have been made to strengthen references to active travel and to require 'multifunctional' green infrastructure.
To meet our development needs it is inevitable that some agricultural land will be used for development.
The site allocation is supported by the plan evidence base including a Landscape Sensitivity and Capacity Study 2024 and traffic modelling.
The site allocation requires the protection of the nearby Ancient Woodland Nightingale Wood.
The site allocation requires the provision of safe and convenient pedestrian and cycle connections and opportunities to maximise the provision of public transport.
The site allocation requires vehicular access to be via the existing site access road off the A1060.

Growth Area 3 – South and East Chelmsford (paragraphs 7.340-7.348 and Figure 18)

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Area 3 – South and East Chelmsford (Paragraphs 7.340-7.349 and Figure 18)	2	5	10	10

Summary of Representations – main issues and suggested changes:

- Support expressed (Pigeon (Sandon) Ltd, Cycling UK)
- In para. 7.341 add reference to 'multifunctional' green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Reword 'Site infrastructure requirements' sections in revised site policies to simply refer to school land requirements i.e. 'A new primary school (Use Class F1(a)) with co-located early years and childcare nursery (Use Class E(f)) on 2.1 hectares of suitable land allocated for education and childcare use' (Essex County Council)
- Expand para. 7.343 to refer to 'new' bus services as well as enhanced (Essex County Council)
- Amend para 7.345 to reflect that only Location 10 will provide improvements to the A132/B1012 Rettendon Turnpike Junction as development at Danbury

and Bicknacre will only provide site access and local walking and cycling improvements as appropriate (Essex County Council)
- Require financial contributions for provision of new and/or enhanced bus services in the 'Movement and Access / Site Infrastructure Requirements' sections of site policies (Essex County Council)
- Do not support. Need a Green Belt Review to identify a more sustainable distribution of new housing including within/around Key Service Settlements in the Green Belt (Whirledge & Nott, Croudace Homes)
- Various comments from landowners/developers promoting their proposed development sites including within the Green Belt.

Main issues raised in relation to locations in Growth Area 3 appear under the specific sites e.g. SGS16a.

CCC response to the comments made
Various text amendments made including reference to `multifunctional' green infrastructure and new bus services.
Site policies have been reworded in respect to school land requirements.
The amount of development required during the plan period 2022-2041 can be accommodated outside of the Green Belt so there is no need to carry out a Green Belt review. This accords with national policy and guidance.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.

Location 16 – East Chelmsford

Strategic Growth Site 16a – East Chelmsford Garden Community (Hammonds Farm)

Key statistics:

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
Strategic Growth Site 16a – East Chelmsford Garden Community (Hammonds Farm)	9	4410	4433	4448

It should be noted that in some cases, members of the public raised similar points to stakeholders listed in brackets. This is especially the case in relation to comments made by Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group to this Strategic Growth Site which have been replicated and amplified by many individuals. To avoid duplication, these comments have not been repeated in the public comments. However, this does not affect the consultation process as this report focuses on the main issues received rather than the number of representations to any individual section of the plan.

Summary of Representations – main issues and suggested changes:

- Supportive of Garden Communities and that they follow TCPA Garden City Principles, and recommend that East Chelmsford is progressed having regard to the key principles set out in the Essex Design Guide - Garden Communities (Essex County Council)
- Fully support the numbers and types of homes/employment proposed in the site allocation (Wates Developments and Hammonds Estates LLP)
- Support the introduction of new employment uses in the area that will help strengthen Chelmsford's economy (CNG Fuels)
- The delivery of Site 16b is conditional upon the masterplan of Site 16a, and consequently the expectation of delivery by 2030 maybe unrealistic (Greystoke CB)
- Identify in the policy that the Garden Community has potential to support an innovative and bespoke housing mix to assist in optimising delivery, and achieving Garden City Principles (Wates Developments and Hammonds Estates LLP)
- Inconsistent with two very recently adopted neighbourhood plans (Little Baddow Neighbourhood Plan (2023) and the Sandon Neighbourhood Plan (2023)) as well as with the Reg 15 Submission Version of the emerging Danbury Neighbourhood Plan (2024) (Croudace Homes)
- The site is not needed in the Plan, the housing numbers could be met by extending North East Chelmsford Garden Community
- Building more at North East Chelmsford Garden Community would be more suitable as it has the infrastructure in place already, and would preserve this rural area, its good quality farmland and protect the community here (Little Baddow Society, Danbury Parish Council)
- All of the previous five options included additional growth in North East Chelmsford Garden Community so why is development not going there
- The housing numbers are not needed until the end of the Plan period so it is premature to consider the site now
- Development should be on brownfield sites, not greenfield sites
- This is Green Belt land and should not be built on
- Green Belt land to the southwest of Chelmsford should be considered instead (Boreham Conservation Society, Barratt David Wilson (Eastern Counties))
- A continuation of development between Regiment Way and the route of the new NE Bypass to the West of Broomfield would be better (Boreham Conservation Society)
- The site is in an unsuitable location, detached from Chelmsford. Development would result in urban sprawl and there should be no development to the east of the A12 as it is a defensible boundary (Boreham Conservation Society, Richborough, This Land Ltd, Croudace Homes, Barratt David Wilson (Eastern Counties))
- Unacceptable loss of high grade agricultural land (Sandon Parish Council, Great Baddow Parish Council, CPRE Essex, Boreham Conservation Society, Danbury Parish Council)
- There is no evidence showing actual land quality, only general agricultural land classifications have been provided (Sandon Parish Council, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- Additional crime in the area

- The site was not selected in the current adopted Local Plan and nothing has changed for the reasons it was not selected then, so it should not go ahead now (This Land Ltd, Danbury Parish Council, Croudace, Barratt David Wilson (Eastern Counties))
- Support the allocation of sites for Gypsy, Traveller and Travelling Showpeople housing needs (Basildon Borough Council)
- No evidence that a Gypsy and Traveller site is needed, and this is not a suitable location for one
- Support for additional employment in the area
- 'Supporting on-site development', bullet 3 should be amended as it is premature to assume the school will be an all-through school. However, the primary and secondary school should be co-located to provide the option of an all-through school, but a statutory process is required to be followed to determine the type(s) of school(s) established (Essex County Council)
- ECC's document 'SEND Sufficiency Plan For Engagement Autumn 2023' identifies a lack of special educational needs schools in the east of Essex. Due to the number of schools proposed at site 16a, consider a SEND school for children aged up to 16 years (and beyond if possible) on the site for the provision of children and young people in east Essex (Maldon District Council)
- No infrastructure is in place to support this development (roads, healthcare – GPs and Hospitals, dentists, education, waste water and sewerage, emergency services) (Boreham Conservation Society, Woodham Walter Parish Council, Danbury Parish Council)
- The amount of infrastructure required will delay the delivery timeframe for the site (This Land Ltd, Croudace Homes)
- The site policy does not plan sufficiently for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments (Great Baddow Parish Council)
- Policy should be more positive requiring the development to provide renewable, low carbon and decentralised energy schemes on site (Essex County Council)
- Supports in principle the Movement and Access requirements for the site to provide substantive active and sustainable travel connections to the Chelmsford Urban Area and key destinations (Essex County Council)
- Site requirements should be amended to help ensure wider connectivity to and from the site is achieved (Essex County Council)
- Include in the site infrastructure measures to ensure the community is highly walkable with safe and lit pathways which connect forming a walking and cycling network to surrounding areas such as Danbury, Little Baddow, Sandon and Great Baddow (Great Baddow Parish Council)
- There are opportunities to improve the National Cycle Network in the area, including improvements to NCN1 which has some significant issues deterring its use (Cycling UK)
- The proposed cycle route link to Boreham junction will be very important to provide an active travel link to Beaulieu Station, North Chelmsford and a link to the countryside for leisure cyclists and is a better alternative to the existing cycle route (Cycling UK)

- No suitable mitigation measures set out for transport/highways impacts (Little Baddow Society)
- The impact assessment indicates that the development in this location will cause issues on the A12 between J17 and J19, which National Highways has no plans to mitigate
- The proposed mitigation to reduce congestion on the A414 acknowledges that this will drive more rat-running through Little Baddow and Sandon, exacerbating an already significant problem
- Traffic congestion will impact wider Villages and areas such as Little Baddow, Great Baddow, Bicknacre, Danbury, Sandon and Boreham, Woodham Walter, as well as residents from Maldon (Sandon Parish Council, Great Baddow Parish Council, Chelmer Valley Landscape Group, Little Baddow Society, Boreham Conservation Society, Little Baddow Society, Little Baddow History Centre, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Woodham Walter Parish Council, Danbury Parish Council)
- Unacceptable impact on the local (rat-running and congestion, including the A414 and Eves Corner) and strategic road (A12 capacity and junctions) networks with no evidence to support the proposal (Sandon Parish Council, Essex Waterways Ltd, Chelmer Valley Landscape Group, Little Baddow Society, Boreham Conservation Society, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, This Land Ltd, Woodham Walter Parish Council, Danbury Parish Council, Croudace Homes, Barratt David Wilson (Eastern Counties))
- Will result in delays along the A414 from Danbury for buses from SWF and Maldon unless dedicated bus lanes are factored into the road improvements along this section of the A414 (South Woodham Ferrers Residents Party, Danbury Parish Council)
- More traffic onto the A130/A12 causing further commuter delays at the Howe Green and Sandon junctions. There may also be negative effects on the use of the Sandon Park and Ride (South Woodham Ferrers Residents Party)
- Impact of wider projects including the Lower Thames crossing, A12 widening, Norwich to Tilbury Pylons, Bradwell power station on traffic flows has not been considered (Great Baddow Parish Council, Boreham Conservation Society)
- Impact of traffic using the new station has not been sufficiently accounted for in the traffic modelling (Sandon Parish Council)
- The impact of additional houses in North East Chelmsford Garden Community would be less on local roads and the A12 than this location
- No traffic modelling has taken place to support this site
- Traffic modelling evidence is insufficient and the impact of the proposed development on the main road network (A12 and A414) is highly likely to be severe (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Danbury Parish Council)
- Impact of construction traffic on already congested local road network (Chelmer Village Council)
- Encourage ongoing discussions with the Public Transport Operator and the Local Highway Authority to assist with the continuing delivery of infrastructure in Growth Area 3 (Basildon Borough Council)
- Further evidence on how active travel corridors will be made safe and lit to encourage sustainable travel is required (Great Baddow Parish Council)

- Challenge the deliverability of sustainable travel opportunities to deliver a 60% modal share for active and sustainable transport, particularly to the two Stations. If not achieved the impact on the A12 cannot be effectively mitigated (Strutt and Parker Farms Ltd, Gladman Developments Ltd, This Land Ltd, Croudace Homes)
- Increased use of City Centre train station which is nearing capacity (Barratt David Wilson (Eastern Counties))
- Remove the word 'dedicated', from bullet point 6 under Movement and access, so that all avenues for providing car clubs with operators can be explored (Wates Developments and Hammonds Estates LLP)
- Agree with the policy requirement for significant new multifunctional green and blue infrastructure, and this should form the framework for delivering suitable SuDS and flood risk management and achieving 20% BNG (Anglian Water)
- Support that at least half the gross site area is multifunctional green and blue infrastructure, to provide sufficient space to maximise all opportunities including public access and amenity (Anglian Water)
- A distinction between public green spaces and habitats for wildlife should be explicitly clarified in the site policy (Environment Agency)
- While the Local Plan promotes habitat enhancement and biodiversity through measures like vegetation planting, and encourages designs that incorporate biodiversity features, we would like to see it specified that native species are used in all cases (Environment Agency)
- Add an explicit preference to retaining riparian corridors as public open space over private gardens. Include buffer zones alongside rivers reserved as public space, rather than private land that backs directly onto a river (Environment Agency)
- Supports the Historic and Natural Environment masterplanning principles to include conserve and enhance biodiversity and avoid adverse effects on the River Chelmer, and Old Hare Wood Local Wildlife Sites, Waterhall Meadows Essex Wildlife Trust Nature Reserve, and Long Spring Wood and Hall Wood ancient woodlands, and Blakes Wood and Lingwood Common SSSI. Also reference Danbury Common SSSI (National Trust)
- The site currently floods, and this will be made worse both within and around the site if built on. It could impact rivers if suitable waste water/sewerage facilities are not sufficient to deal with flooding and climate change impacting the health of waterway users as well as pollution to wildlife (Sandon Parish Council, Great Baddow Parish Council, Chelmer Valley Landscape Group)
- Insufficient modelling has been undertaken to review the full effects of flood risk, including future climate change and if this will adversely affect flooding (Great Baddow Parish Council, Chelmer Valley Landscape Group, Little Baddow Society, Boreham Conservation Society, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Danbury Parish Council)
- Significant areas of the allocation lie within Flood Zone 2 and 3. The site allocation does not pass the sequential test as there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding (Strutt and Parker Farms Ltd, Richborough, This Land Ltd, Tayor Wimpey)
- Pollution and harm to the river environment from the development, including the Chelmer and Blackwater Navigation Landscape Conservation Area

(Sandon Parish Council, Great Baddow Parish Council, Chelmer Valley Landscape Group, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Woodham Walter Parish Council)

- Additional pressure on the Chelmer and Blackwater Navigation for recreational purposes including walking, cycling, canoeing, paddle-boarding and boating as well as visitor parking without any proposals to provide improvements or mitigation (Essex Waterways Ltd, Chelmer Valley Landscape Group)
- The proposed new bridge will split the development in half, be unduly prominent in the river valley, create noise and moving visual intrusion, and be detrimental to the character and appearance of the designated Chelmer and Blackwater Navigation Conservation Area and views from Boreham House. No amount of landscape enhancement will mitigate the harm it will cause (Essex Waterways Ltd, Chelmer Valley Landscape Group, Boreham Conservation Society)
- Impact on users' enjoyment of existing footpaths and rivers for recreation and pleasure
- Harm to the rural landscape and urbanisation of the area, including Waterhall Meadow, an ancient flood meadow (Sandon Parish Council, CPRE Essex, Little Baddow Society, Boreham Conservation Society, Essex Wildlife Trust, Danbury Parish Council, Croudace Homes)
- The impact on the landscape would be damaging and hard to mitigate (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- Increased air pollution
- Harm to the natural environment and protected areas of wildlife/habitats in the vicinity (Sandon Parish Council, CPRE Essex, Essex Wildlife Trust, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Richborough)
- Harm to wildlife in the area and loss of habitat for species including, muntjac, bats, badgers, foxes, birds (Sandon Parish Council, Little Baddow Society, Boreham Conservation Society, Essex Wildlife Trust, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- There are several areas of Lowland Mixed Deciduous Woodland, which are Priority Habitat Woodland, within or adjacent to the site which need to be considered. Lowland Mixed Deciduous Woodlands are on the Priority Habitat Inventory, England. Fragmentation of woodland reduces its ecological value and woodlands can suffer loss or deterioration from development nearby (Forestry Commission England)
- Any planning application for major residential development should be required to include a robust assessment of the residual recreational impact of the development on the nearby SSSI's, local wildlife sites and ancient woodlands, and that mitigation measures are included where appropriate. This should consider cumulative development in the area (National Trust, Natural England, Essex Wildlife Trust, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Richborough)
- The site has been submitted for consideration for it to be designated as an Area of Outstanding Natural Beauty/National Landscape and proposals for development are premature until this has been considered by Natural England (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Danbury Parish Council, Croudace Homes)

- Undertake a Heritage Impact Assessment (HIA) in advance of Regulation 19 to determine whether the site is suitable for allocation, to inform its capacity, and to identify any necessary mitigation and enhancement measures. If the site is deemed suitable incorporate any mitigation and enhancement measures into the site policy (Historic England)
- Impact on heritage and archaeological assets in the area (Little Baddow Society, Little Baddow History Centre, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Richborough)
- Maintain the character of and biodiversity along Graces Walk (Cycling UK)
- Agree with the principle of bullet 4 of Historic and Natural Environment, but adjust to reflect that all of the listed buildings are outside of the development's ownership, rendering it impossible to enhance the structures themselves (Wates Developments and Hammonds Estates LLP)
- The policy wording in relation to heritage assets utilises the statutory language of 'preservation'. Suggest a more appropriate term would be 'conservation', to reflect national planning policy (Wates Developments and Hammonds Estates LLP)
- Remove Church Lane as a 'Protected Lane' as the Protected Lanes Study for Chelmsford Borough Council: Summary Report 2009 states that it does not meet the 'protected lane' threshold (Wates Developments and Hammonds Estates LLP)
- It is not yet known whether the site contains a viable minerals resource that would require extraction prior to development (Little Baddow Society, Little Baddow History Centre, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Croudace Homes, Tayor Wimpey)
- Ensure any Anglian Water assets within and adjacent to the site that may be affected by the development are reflected in the site policy including a requirement for appropriate safeguarding of suitable access for the maintenance of foul and surface water drainage infrastructure (Anglian Water)
- Expand policy to require the development to prepare a strategy for responding to the National Grid Electricity Transmission plc (NGET) overhead transmission lines present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design (National Grid Electricity Transmission)
- Houses should not be built close to the pylons on site
- The National Grid Transmission Overhead Lines, UK Power Networks Overhead Lines and Cadent Local High Pressure Gas Mains constrain the site for development (This Land Ltd)
- Support the reference in `Site infrastructure requirements' regarding early years, primary and secondary provision subject to some minor amended wording including adding a reference to accordance with Policy S10 (Essex County Council)
- Support for the provision of open spaces, sports, and physical activity provided in the policy (Sport England)
- Under the subheading 'site infrastructure requirements' and in bullet point 8 at the end add "and police facilities as required by Essex Police" (Essex Police)
- Uncertainty over the viability of the site in respect of the scale and cost of highways improvements that will be required (Strutt and Parker Farms Ltd, Richborough, Gladman Developments Ltd, Tayor Wimpey)

- The site is in multiple ownerships and therefore constraints associated with land values and timely delivery (Richborough)
- Support bullet points 1-3 of Site Infrastructure Requirements, but welcome further flexibility through additional text stating “or the equivalent land take needed to deliver the school places identified as needed by the Local Authorities with Responsibility for Education (LARE)”, given the requirement could flex over time. References to the education provider should be renamed as the Local Authorities with Responsibility for Education (Wates Developments and Hammonds Estates LLP)
- Support the principle of providing contributions towards the facilitation of necessary highway transport infrastructure under bullets 4 and 5 Site infrastructure requirements, but add clarity that the appropriate improvements will be defined by the Transport Assessment (Wates Developments and Hammonds Estates LLP)
- In relation to bullet 6 of Site Infrastructure Requirements clarification is sought in the wording that the definition of bus-based rapid transit refers only to the sustainable modes bridge over the A12, and does not require the provision of dedicated bus corridors throughout the development (Wates Developments and Hammonds Estates LLP)
- Bullet 8 of Site Infrastructure Requirements could be interpreted as open-ended, add additional wording so it reads “Provide and/or financial contributions to healthcare provision as required by the NHS Mid and South Essex Integrated Care Board to address the needs of the development.” (Wates Developments and Hammonds Estates LLP)
- Stewardship principles are supported and should be established early on with an asset schedule prepared to outline management and maintenance of assets (Essex County Council)
- Do not support the description of a masterplanning principle within Para. 7.224 (Section 3) that there should be a “choice of unimpeded route corridors within the developed area, able to carry rapid transit services”. Whilst bus priority is supported in principle, this could suggest a need for a continuous dedicated bus-only corridor through the site. The principle of bus priority and rapid transit can be achieved through a combination of measures (Wates Developments and Hammonds Estates LLP)
- Add a new line at the end of para. 7.362 as follows “Appropriate funding will also need to be made for police facilities to provide for community safety, cohesion and policing as required by Essex Police.” (Essex Police)
- Joint working between the Councils is needed to ensure there are no detrimental impacts on Basildon Borough and its residents from development in Growth Area 3 (Basildon Borough Council).

CCC response to the comments made
As the site is allocated as a new Garden Community and the largest new Strategic Allocation, an additional requirement for a Travelling Showpeople site for 13 serviced plots has been included to ensure the Plan seeks to meet the higher identified Travelling Showpeople’s needs identified by the updated GTAA.
The policy has been amended to clarify that the new Country Park will be primarily informal and natural in nature to better reflect the aspiration for this area set out in the Reasoned Justification – that the area is expected to retain and improve habitats for wildlife and provide new and enhanced recreational opportunities, including the waterways.

The policy now includes a requirement to provide necessary mitigation to address the cumulative recreational pressure on SSSIs in proximity to the site.
Danbury Common has been added as a SSSI to be conserved and enhanced, and to avoid adverse effects on within the policy requirements and Reasoned Justification.
Site infrastructure requirements and Reasoned Justification have been expanded to include contributions towards addressing cumulative recreational pressure on SSSIs in proximity to the site.
The Reasoned Justification has been expanded to explain that high quality semi-natural greenspaces of at least 12ha each should be provided to meet Natural England's 8ha/1000 new population metric and minimum circular dog-walking route on or off site of 2.3km which make use of existing Public Rights of Way and/or highways.
Reference to the precise uses of the multifunctional green and blue infrastructure being defined through the masterplanning process has been added to the Reasoned Justification. This now sets out that this will include delineating specific areas where wildlife and ecological areas are prioritised.
For clarity the policy requirements now require the area to the east of Sandon Brook notated on the Policies Map for Future Recreation/SuDS/Biodiversity should focus on informal recreation, natural and semi natural green infrastructure uses rather than formal sports recreation requiring floodlighting or significant servicing.
The need to provide visual and acoustic screening to the A12 and minimise the impact of lighting in particular within the employment areas has been added as a requirement to the policy.
The Reasoned Justification has been expanded to include buffer zones alongside rivers, reserved as public space, as part of compensatory measures to provide landscape enhancement as part of a scheme.
The Reasoned Justification has been expanded to note that the achievement of 20% biodiversity net gain on site will be subject to site constraints.
Reference to the need for the new Country Park to include high quality semi-natural greenspace to be used in conjunction with the existing PROW network to provide circular dog-walking routes of at least 2.3km has been added to the Reasoned Justification.
To reflect that it is as yet unknown if the school on site will be a through school or not the policy wording and Reasoned Justification amended to include a co-located primary and secondary school with early years and childcare nursery (with potential for a sixth form centre).
Reference to traffic free environments around school entrances are considered too detailed for the Policy but would be dealt with at masterplanning or planning application stage. No changes required.
Policy requirement and Reasoned Justification for new and enhanced pedestrian, cycle and where appropriate bridleway connections within the site expanded to ensure both the Reasoned Justification and policy requirement include reference to links to the River Chelmer Navigation, Little Baddow and Great Baddow.
Reference to a 'dedicated' car club for residents and businesses on site has been amended to ensure it is also available to wider users in the area.
The Council has undertaken various Heritage Impact Assessments to inform the Local Plan, with a specific assessment being undertaken for the Hammonds Farm site. The levels of harm identified within the Hammonds Farm Heritage Impact Assessment are considered to be justified. Whilst parts of the site are identified as being of high heritage value, other parts, particularly to the south are of variable or

lower heritage value. The heritage harms identified do not necessarily rule out the development, rather they need to be avoided, minimise or mitigated as part of the masterplan for the proposals. Reference to heritage assets which require consideration have been updated in the policy requirements and Reasoned Justification.
The requirement for a detailed Heritage Impact Assessment to be prepared has been added as a policy requirement as the site, particularly land to the north of Rumbolds Farm, Hammonds Road, contains a significant number and configuration of crop marks requiring further investigation. The Reasoned Justification sets out the requirements for such an assessment, and that once complete the evaluation will inform the location of development parcels and open space within the masterplan.
The Little Baddow, Danbury, Boreham and Sandon Parish Councils response included a reference to Little Baddow Parish Councils proposals for three conservation areas to be designated; at Great Graces, St Marys Church and North Hill. Further work is being undertaken to explore a conservation area on North Hill by CCC. Conservation areas at Grace Graces and St Marys Church are not justified and the duty to preserve and enhance the setting of the various designated heritage assets at these sites is considered adequate.
Wording used in the description of how various heritage assets should be treated e.g. preserved/conserved etc, and their significance complies with National Policy and Guidance. No changes required.
The requirement for a sensitively designed new bridge to assist in preserving and enhancing the character or appearance of the Chelmer and Blackwater Navigation Conservation Area and its setting has been added to the policy.
The need to provide appropriate landscape buffers within the site to protect the settings of The Hammonds, Phillows and Rumbolds farmsteads which are within the site (the latter farmhouse being a non-designated heritage asset) has been added as a policy requirement.
Reference to Boreham has been added to the policy requirement to protect and celebrate landmark views, including those to Danbury, Little Baddow and Sandon Churches.
The need to provide substantial linear landscape buffers to retain the significance of the Hurrells Protected Lane and Graces Walk has been added as a policy requirement. Church Lane is identified within the 2010 Protected Lanes Study so is considered as such.
The requirement for heritage trails has been expanded to also require ecological trials to be delivered. The need to recognise and celebrate the site's rich historic, social and natural history through such trials has also been added to this policy requirement.
The Reasoned Justification has been expanded to ensure heritage, social history and natural environment celebration and interpretation plays a positive role in reinforcing local character and promoting heritage and understanding such as the works of renowned local nature writer J. A. Baker who has connections with this area.
The need for development on the eastern and northern margins of the site to be lower density and landscaped to reflect a transition to the open countryside beyond has been added as a policy requirement.
A further policy requirement to provide public art which contributes towards place creation and celebrates the historic, social and environmental context of the site and the local area has been added.

The need for the layout of the site to provide a strategy for responding to the National Grid Electricity Transmission overhead transmission lines present within the site has been added as a policy requirement with further guidance on this included within the Reasoned Justification.
The design and layout of the site needing to incorporate appropriate safeguarding of suitable access for the maintenance of foul and surface water drainage infrastructure has also been added as a new policy requirement and set out in the Reasoned Justification.
Financial contributions to the delivery of the Chelmsford North East Bypass (CNEB) has been removed as a policy requirement as the full CNEB is not required to support the Local Plan growth. Contributions towards, or the provision of, other sections of the CNEB are a requirement of site SGS6, 7a, 7b, 7c and 8 as they are directly related to the need for these sections.
The policy requirement to provide a new active and sustainable route and bridge over the A12 to connect to Sandon Park and Ride has been amended for it to be 'close to' Sandon Park and Ride.
The policy requirement for traffic calming measures has been expanded to clarify that this is to deter traffic on local roads from using Church Road and now also includes reference to Plantation Road and Main Road in Boreham.
For clarity and consistence, reference to 'active' and sustainable transport has been added to the Reasoned Justification.
The Council commissioned Essex Highways to review and consider the key issues raised in the highway and transportation responses received to the consultation. This is given in Appendix 2 and includes a review of the Transport Technical Note, prepared by Stomor (June 2024) on behalf of Little Baddow, Danbury, Boreham and Sandon Parish Councils. Essex Highways response has been used by CCC to understand and respond to matters of concern raised in this You Said We Did report and to inform the Pre-Submission Local Plan.
The highways modelling undertaken for the Local Plan is strategic and area-wide in nature. More detailed modelling to assess the impact of proposed development on the local road network and the detailed mitigation required to accommodate new trips associated with it, will be required and undertaken as part of the planning application process for allocated sites in the Local Plan.
Updated junction modelling has been undertaken as part of the Pre-Submission Local Plan Highways Modelling Appraisal. Early concept development accesses onto the wider road network are also included in the latest Local Plan Pre-Submission modelling, based on outline developer proposals.
Overall, the Pre-Submission Local Plan Highways Modelling Appraisal, undertaken by Essex Highways, concludes that by maximising the potential for sustainable accessibility to and from the sites along the A12 corridor, the impact on the strategic highway network should not be considered severe. However, continued discussions with National Highways will be necessary to best ensure that future development growth in Chelmsford can be supported by the strategic highway network over the long-term.
It is not within the practical scope of the Local Plan highways modelling to assess the scale of mitigation required along alternative sustainable corridors into the city centre from the Hammonds Farm site. However, the Local Plan transport modelling evidence base does recognise the need for a city centre sustainable access corridor study to be undertaken as part of the Hammonds Farm planning application, should proposals for a bus service to Beaulieu Rail Station be

compromised by access difficulties at the Boreham Interchange. No changes required.
Site infrastructure requirement has been amended to require the provision or contributions towards other community facilities, including police, ambulance and fire and rescue facilities.
The encouragement of appropriate development of renewable, low carbon and decentralised energy schemes, and mass waste collection systems within the site policy has been amended to state where these are deliverable and do not give rise to environmental or other amenity impacts. However, this remains something that will be encouraged and not required as there is insufficient evidence or policy to require this on site.
As with the North East Chelmsford Garden Community a further policy requirement has been added to require stewardship activities to be in place in advance of the first housing occupations to ensure timely delivery of community development activities. Any further references to the requirements to stewardship arrangements will be determined through the relevant Stewardship Strategy, once agreed.
As with other site allocations where there may be mineral recourses a Minerals Recourse Assessment is required to be undertaken. An initial assessment has bene undertaken and additional wording added to the Reasoned Justification which acknowledges that is a workable mineral resource that would be sterilised by the non-mineral development and thus the supporting statement to the application needs to demonstrate that the need for the built development is such that it outweighs the sterilisation of the mineral resource.
The plan is informed by an up to date and proportionate flood risk evidence base including Level 1 and 2 SFRAs and Sequential & Exception Test supported by detailed modelling. The flood risk reports make use the most recent national policy and legislation available at the time of writing (Autumn 2024, pre the 12th December 2024 NPPF) and are informed by discussions with the Environment Agency, considers risks from all sources of flooding and include climate change modelling.
In response to the Flood Risk Summary Statement prepared by Stomor (June 2024) on behalf of Little Baddow, Danbury, Boreham and Sandon Parish Councils, the Level 2 SFRA site summary table including the key messages section has been amended and updated. An updated site boundary has also been tested and included in the assessment.
The new SFRA Level 2 site summary table for 16a assessed the site allocation boundary included within the Pre-Submission Local Plan. Except for the bridge across the Chelmer approximately 400m east of the A12 and an access road, no development is proposed in Flood Zones 2 and 3. The bridge and access road are classed as ‘essential infrastructure and are therefore included in the assessment. At planning application stage, the site-specific Flood Risk Assessment (FRA) produced by the applicant will need to demonstrate that the bridge and access road will not increase flood risk elsewhere. As a water compatible use, the Country Park has not been assessed for flood risk.
Being a large strategic allocation, the wider site includes an area of flood risk. As shown on the Policies Map, development will only be located in areas at least risk of flooding. The areas at higher risk of flooding will form the country park, which will largely be natural in character, and other open space.
As stated in the NPPF, the exception test is a method used to demonstrate that flood risk to people and property will be managed appropriately, where alternative

sites at a lower flood risk are not available. The exception test is applied following the sequential test. The Sequential and Exception Test for this site has been informed by the Level 2 SFRA and IIA and has been updated to reflect updated information, the revised site boundary and considerations of reasonable alternatives as part of the IIA. This has informed the Pre-Submission Local Plan.
The Local Plan is informed by an Air Quality Assessment 2024 which overall concludes that the impact of the Local Plan in 2041 can be considered negligible for all pollutants.
The need to conserve and enhance biodiversity and wildlife sites is covered by the Policy requirement to Conserve and enhance biodiversity and avoid adverse effects on the River Chelmer, and Old Hare Wood local wildlife sites, Waterhall Meadows Essex Wildlife Trust Nature Reserve, and Long Spring Wood and Hall Wood ancient woodlands, and Blakes Wood, Danbury Common, and Lingwood Common. In addition, Policy DM16 requires all developments to conserve and enhance the network of habitats, species and sites (both statutory and non-statutory, including priority habitats and species) of international, national and local importance commensurate with their status and give appropriate weight to their importance. Collectively these requirements will ensure all habitats are protected appropriately. No further changes required.
The use of native species in planting on sites is set out in Policy DM16. The Plan should be read as a whole so it is not necessary to repeat this in site policies. No changes required.
Natural England has confirmed to CCC that they are not taking on any additional new Area of Outstanding Natural Beauty (AONB) designation projects at the current time. They have also advised that there is no formal application process for National Park or National Landscape (AONB) designation and that any future search will be England-wide. As such, the site allocation is not considered premature and Natural England are not objecting to the site allocation in principle. A copy of the Natural England letter confirming their position in December 2023 is attached at Appendix 3.
A full Plan Viability Assessment has been undertaken which shows the site, with the required infrastructure identified, is viable to develop. No changes required.
Where relevant design guidance in the Neighbourhood Plans for Little Baddow, Sandon and Danbury will be used to assist in masterplanning and planning application process for the site. No changes required.
To meet our development needs it is inevitable that some agricultural land will be used for development.
The site a greenfield site but not ‘Green Belt’ land, where different planning policy and guidance applies.
Policy S7 tested a range of reasonable alternative options and sites. Alternative spatial strategies and sites for allocation in the Local Plan are covered in more detail within the Spatial Strategy Topic Paper and IIA.
The detailed mix of employment uses and size and type of units will be determined through the masterplan process. No changes required.
The Housing Trajectory and timings within it are established through the Council’s Five Year Housing Land Supply Methodology (April 2024). The Trajectory is updated annually, and the Pre-Submission Local Plan uses the latest available Housing Site Schedule (April 2024).
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process.

Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.

Strategic Growth Site 16b – Land adjacent to A12 Junction 18 Employment Area

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Strategic Growth Site 16b – Land adjacent to A12 Junction 18 Employment Area	5	4331	4337	4348

It should be noted that in some cases, members of the public raised similar points to stakeholders listed in brackets. This is especially the case in relation to comments made by Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group to this Strategic Growth Site which have been replicated and amplified by many individuals. To avoid duplication, these comments have not been repeated in the public comments. However, this does not affect the consultation process as this report focuses on the main issues received rather than the number of representations to any individual section of the plan.

Summary of Representations – main issues and suggested changes:

- Inconsistent with two very recently adopted neighbourhood plans (Little Baddow Neighbourhood Plan (2023) and the Sandon Neighbourhood Plan (2023)) as well as with the Reg 15 Submission Version of the emerging Danbury Neighbourhood Plan (2024)
- The site is not needed in the Plan, the housing numbers could be met by extending North East Chelmsford Garden Community
- Building more at North East Chelmsford Garden Community would be more suitable as it has the infrastructure in place already, and would preserve this rural area, its good quality farmland and protect the community here (Little Baddow Society, Danbury Parish Council)
- All of the previous five options included additional growth in North East Chelmsford Garden Community so why is development not going there
- The housing numbers are not needed until the end of the Plan period so it is premature to consider the site now
- Development should be on brownfield sites, not greenfield sites
- This is Green Belt land and should not be built on
- Green Belt land to the southwest of Chelmsford should be considered instead (Boreham Conservation Society)
- A continuation of development between Regiment Way and the route of the new NE Bypass to the West of Broomfield would be better (Boreham Conservation Society)
- The site is in an unsuitable location, detached from Chelmsford. Development would result in urban sprawl and there should be no development to the east of the A12 as it is a defensible boundary (Boreham Conservation Society)

- Unacceptable loss of high grade agricultural land (CPRE Essex, Boreham Conservation Society, Danbury Parish Council)
- There is no evidence showing actual land quality, only general agricultural land classifications have been provided (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- Additional crime in the area
- The site was not selected in the current adopted Local Plan and nothing has changed for the reasons it was not selected then, so it should not go ahead now (Danbury Parish Council)
- No evidence that a Gypsy and Traveller site is needed, and this is not a suitable location for one
- Support the cluster of employment opportunities coming forward at Locations 3, 16a and 16b that will help strengthen Chelmsford's economy (Wates Developments and Hammonds Estates LLP, CNG Fuels)
- Support for the range and types of uses in the allocation but consider it should be a minimum of 55,000 sqm, or state in the policy that more than 43,000 sqm will be supported where it can be successfully demonstrated as deliverable through the planning application processes (Pigeon (Sandon) Ltd)
- The site is in single ownership and there has been pre-application engagement so there is no need for the requirement for a masterplan in the policy. If the requirement remains request paragraph 7.386 is amended to read 'The development of the site will be subject of a masterplan agreed with the Council prior to the determination of a planning application' (Pigeon (Sandon) Ltd)
- Standardise the buildings within the site for sustainability and emphasise active travel movement to the site for employees from the local area (Great Baddow Parish Council)
- The site should provide employment for higher paid/skilled employment areas. In particular, Business Innovation Hub, Corporate Offices, Research and Development Centres, Co-Working Spaces, Incubators and Accelerators, High-Tech Manufacturing, commitments to apprenticeships and working with local schools to develop career pathways, and research and new methods of food production, to mitigate the decrease in agricultural land (Great Baddow Parish Council)
- Employment space should be closer to the City Centre with better transport links
- The employment space should be smaller than proposed
- Support for additional employment in the area
- Support Movement and Access bullet 2 that site access must be provided "in a manner that complements and does not prejudice access to East Chelmsford Garden Community (Hammonds Farm)" (Wates Developments and Hammonds Estates LLP)
- Site can come forward via an access which is completely independent of Hammonds Farm and does not prejudice access to Hammonds Farm. Notwithstanding, fully committed to working collaboratively with 16a to ensure site access arrangements and connections are deliverable in respect of both sites (Pigeon (Sandon) Ltd)
- Essex County Council's document 'SEND Sufficiency Plan For Engagement Autumn 2023' identifies a lack of special educational needs schools in the east of Essex. Due to the number of schools proposed at site 16a, consider

the development of a SEND school for children aged up to 16 years (and beyond if possible) to be located to the east of Chelmsford for the provision of children and young people in east Essex (Maldon District Council)

- Remove reference to early years and childcare nursery in paragraph 7.389 as there is not a policy requirement for one on this site (Essex County Council)
- No infrastructure in place to support this development (roads, healthcare – GPs and Hospitals, dentists, education, waste water and sewerage, emergency services) (Boreham Conservation Society, Woodham Walter Parish Council, Danbury Parish Council)
- There are opportunities to improve the National Cycle Network in the area, including improvements to NCN1 which has some significant issues deterring its use (Cycling UK)
- The proposed cycle route link to Boreham junction will be very important to provide an active travel link to Beaulieu Station, North Chelmsford and a link to the countryside for leisure cyclists and is a better alternative to the existing cycle route (Cycling UK)
- Site infrastructure requirements, bullet 1, amend to read 'Provide safe and convenient pedestrian and cycle links to Sandon Park and Ride and to the east of the site, and routes associated with the East of Chelmsford allocations including East Chelmsford Garden Community (Hammonds Farm)' (Essex County Council)
- Pedestrian and cycle links to the south are not necessarily the most desirable in terms of connectivity and desire lines for movement. The policy should allow for greater flexibility including exploring options for links to the east of the site to connect to the wider road and footpath network (Pigeon (Sandon) Ltd)
- No suitable mitigation measures set out for transport/highways impacts (Little Baddow Society)
- There should be an emphasis of active and sustainable travel for workers on the site (Great Baddow Parish Council)
- Concern over the impact on A12 Junction 18 and if congested traffic will use local roads (Great Baddow Parish Council)
- The impact assessment indicates that the development in this location will cause issues on the A12 between J17 and J19, which National Highways has no plans to mitigate
- The proposed mitigation to reduce congestion on the A414 acknowledges that this will drive more rat-running through Little Baddow and Sandon, exacerbating an already significant problem
- Encourage ongoing discussions with the Public Transport Operator and the Local Highway Authority to assist with the continuing delivery of infrastructure in Growth Area 3 (Basildon Borough Council)
- Traffic congestion will impact wider Villages and areas such as Little Baddow, Great Baddow, Bicknacre, Danbury, Sandon and Boreham, Woodham Walter, as well as residents from Maldon (Chelmer Valley Landscape Group, Little Baddow Society, Boreham Conservation Society, Little Baddow History Centre, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Woodham Walter Parish Council, Danbury Parish Council)
- Unacceptable impact on the local (rat-running and congestion, including the A414 and Eves Corner) and strategic road (A12 capacity and junctions) networks with no evidence to support the proposal (Chelmer Valley

Landscape Group, Little Baddow Society, Boreham Conservation Society, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Woodham Walter Parish Council, Danbury Parish Council)

- Will result in delays along the A414 from Danbury for buses from SWF and Maldon unless dedicated bus lanes are factored into the road improvements along this section of the A414 (South Woodham Ferrers Residents Party, Danbury Parish Council)
- More traffic onto the A130/A12 causing further commuter delays at the Howe Green and Sandon junctions. There may also be negative effects on the use of the Sandon Park and Ride (South Woodham Ferrers Residents Party)
- Impact of wider projects including the Lower Thames crossing, A12 widening, Norwich to Tilbury Pylons, Bradwell power station on traffic flows has not been considered (Boreham Conservation Society)
- The impact of additional houses in North East Chelmsford Garden Community would be less on local roads and the A12 than this location
- No traffic modelling has taken place to support this site
- Traffic modelling evidence is insufficient and the impact of the proposed development on the main road network (A12 and A414) is highly likely to be severe (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Danbury Parish Council)
- The site currently floods, and this will be made worse both within and around the site if built on. This could impact rivers if suitable waste water/sewerage facilities are not sufficient to deal with flooding and climate change impacting the health of waterway users as well as pollution to wildlife (Chelmer Valley Landscape Group)
- Insufficient modelling has been undertaken to review the full effects of flood risk, including future climate change and if this will adversely affect flooding (Chelmer Valley Landscape Group, Little Baddow Society, Boreham Conservation Society, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Danbury Parish Council)
- Significant areas of the allocation lie within Flood Zone 2 and 3. The site allocation does not pass the sequential test as there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding
- Pollution and harm to the river environment from the development, including the Chelmer and Blackwater Navigation Landscape Conservation Area (Chelmer Valley Landscape Group, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Woodham Walter Parish Council)
- Additional pressure on the Chelmer and Blackwater Navigation for recreational purposes including walking, cycling, canoeing, paddle-boarding and boating as well as visitor parking without any proposals to provide improvements or mitigation (Chelmer Valley Landscape Group)
- The proposed new bridge will split the development in half, be unduly prominent in the river valley, create noise and moving visual intrusion, and be detrimental to the character and appearance of the designated Chelmer and Blackwater Navigation Conservation Area and views from Boreham House. No amount of landscape enhancement will mitigate the harm it will cause (Essex Waterways Ltd, Chelmer Valley Landscape Group, Boreham Conservation Society)

- Impact on users' enjoyment of existing footpaths and rivers for recreation and pleasure
- Harm to the rural landscape and urbanisation of the area, including Waterhall Meadow, an ancient flood meadow (CPRE Essex, Little Baddow Society, Boreham Conservation Society, Danbury Parish Council)
- The impact on the landscape would be damaging and hard to mitigate (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- Increased air pollution
- Harm to the natural environment and protected areas of wildlife/habitats in the vicinity (CPRE Essex, Essex Wildlife Trust, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- Harm to wildlife in the area and loss of habitat for species including, muntjac, bats, badgers, foxes, birds (Little Baddow Society, Boreham Conservation Society, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- There are several areas of Lowland Mixed Deciduous Woodland, which are Priority Habitat Woodland, within or adjacent to the site which need to be considered. Lowland Mixed Deciduous Woodlands are on the Priority Habitat Inventory, England. Fragmentation of woodland reduces its ecological value and woodlands can suffer loss or deterioration from development nearby (Forestry Commission England)
- Any planning application for major residential development at the East Chelmsford Growth location should be required to include a robust assessment of the residual recreational impact of the development on the nearby SSSI's, local wildlife sites and ancient woodlands, and that mitigation measures are included where appropriate. This should take account of cumulative development in the area (Essex Wildlife Trust, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- The site has been submitted for consideration for it to be designated as an Area of Outstanding Natural Beauty/National Landscape and proposals for development are premature unit this has been considered by Natural England (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Danbury Parish Council)
- Supportive of the Historic and Natural Environment, and Design and Layout principles (Pigeon (Sandon) Ltd)
- A Heritage Impact Assessment (HIA) should be undertaken in advance of Regulation 19 to determine whether the site is suitable for allocation, to inform its capacity, and to identify any necessary mitigation and enhancement measures. If the site is deemed suitable, incorporate any mitigation and enhancement measures into the site policy (Historic England)
- Impact on heritage and archaeological assets in the area (Little Baddow Society, Little Baddow History Centre, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- It is not yet known whether the site contains a viable minerals resource that would require extraction prior to development (Little Baddow Society, Little Baddow History Centre, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)

- The site falls below the threshold for the need to carry out a Minerals Resource Assessment so remove requirement from the site policy (Essex County Council)
- Houses should not be built close to the pylons on site
- Support for the provision of open spaces, sports, and physical activity provided in the policy (Sport England)
- The delivery of Site 16b is conditional upon the masterplan of Site 16a, and consequently the expectation of delivery by 2030 maybe unrealistic (Greystoke CB)
- Buildings should be sustainably built (Great Baddow Parish Council)
- A Waste Infrastructure Assessment is not required as the affected area will fall outside of the proposed red line boundary for future planning applications (Pigeon (Sandon) Ltd)
- Joint working between the Councils is needed to ensure there are no detrimental impacts on Basildon Borough and its residents from development in Growth Area 3 (Basildon Borough Council).

CCC response to the comments made
This site is for an employment allocation and matters raised which relate to housing or other issues directly within or relating specifically to Site 16a are covered in the feedback for Site 16a.
The policy requirement to protect important views into and through the site from across the Chelmer Valley has been expanded to also include reference to Danbury Ridge.
The policy requirement to mitigate the visual impact of the development has been expanded to include the impact of lighting.
The policy requirement to provide for a mix of building sizes and styles including building design measures to soften visual impact has been expanded to ensure layout, scale, massing and materials are included in this consideration.
The Landscape Sensitivity and Capacity Study 2024 notes that the site has moderate overall landscape sensitivity rating, with a low landscape value rating, and medium to high overall capacity rating. The policy includes requirements to conserve and enhance the local landscape character and has been amended to identify further views to be protected and measures to soften the developments visual impact.
As with all other relevant site allocations the requirement for a masterplan to be agreed with the Council prior to the submission of a planning application has been amended to be required prior to the determination of a planning application.
All site allocation figure is ‘around’ and would allow for more units to come forward if the site can accommodate it in a sustainable manner. This is the approach used consistently through the Plan. No changes required.
The policy requirement to provide safe and convenient pedestrian and cycle connections has been expanded to include connection within the site and to the wider area including to local bus stops, Sandon Park and Ride, Woodhill Road, routes associated with the East of Chelmsford allocations including East Chelmsford Garden Community (Hammonds Farm) and Danbury and the east of the site.
The requirement for a Waste Infrastructure Assessment has been removed following advice from the Waste Authority (ECC), as the entrance to site 16B is not within 250m of the Waste Consultation Area for Sandon Quary.

Suitable brownfield sites have been allocated within the Urban Area. There are not sufficient brownfield sites to meet the Local Plan's development requirements so greenfield sites must be allocated.
The site is allocated for the needs and uses as identified in the Council's Employment Land Review. For this site that is Use Classes E(g)(i-iii), B2 and B8. Thes site policy also allows for other appropriate ancillary employment generating uses so provides flexibility for a range or suitable uses. No changes required.
Reference to early years and childcare nursery in the Reasoned Justification has been removed as ECC has confirmed that there is not a requirement for one on this site.
The infrastructure necessary to support this site allocation is set out within the site policy and Policy S9. Relevant changes have been made to these policies based on the infrastructure needs identified in the updated IDP.
The Council undertook various Heritage Impact Assessments to inform the Local Plan, with a specific assessment being undertaken for the Hammonds Farm site and wider area which covers 16b. Reference to heritage assets which require consideration are included in the policy requirements and Reasoned Justification. No changes required.
CCC has raised the consideration of a special educational needs (SEND) school with ECC through the Duty to Cooperate. More certainty would be needed on the type of provision needed and the fit with ECC's overall strategy. Not enough detailed evidence to change the Plan currently, but CCC will review after Pre-Submission consultation.
Financial contributions to the delivery of the Chelmsford North East Bypass (CNEB) has been removed as a policy requirement as the full CNEB is not required to support the Local Plan growth. Contributions towards, or the provision of, other sections of the CNEB are a requirement of site SGS6, 7a, 7b, 7c and 8 as they are directly related to the need for these sections.
The Council commissioned Essex Highways to review and consider the key issues raised in the highway and transportation responses received to the consultation. This is given in Appendix 2 and includes a review of the Transport Technical Note, prepared by Stomor (June 2024) on behalf of Little Baddow, Danbury, Boreham and Sandon Parish Councils. Essex Highways response has been used by CCC to understand and respond to matters of concern raised in this You Said We Did report and to inform the Pre-Submission Local Plan.
The highways modelling undertaken for the Local Plan is strategic and area-wide in nature. More detailed modelling to assess the impact of proposed development on the local road network and the detailed mitigation required to accommodate new trips associated with it, will be required and undertaken as part of the planning application process for developments identified as preferred sites in the Local Plan.
Updated junction modelling has been undertaken as part of the Pre-Submission Local Plan Highways Modelling Appraisal. Early concept development accesses onto the wider road network are also included in the latest Local Plan Pre-Submission modelling, based on outline developer proposals.
Overall, the Pre-Submission Local Plan Highways Modelling Appraisal, undertaken by Essex Highways, concludes that by maximising the potential for sustainable accessibility to and from the sites along the A12 corridor, the impact on the strategic highway network should not be considered severe. However, continued discussions with National Highways will be necessary to best ensure that future

development growth in Chelmsford can be supported by the strategic highway network over the long-term.
As with other site allocations where there may be mineral recourses a Minerals Resource Assessment is required to be undertaken. No changes required.
CCC has raised the consideration of a special educational needs (SEND) school with ECC through the Duty to Cooperate. More certainty would be needed on the type of provision needed and the fit with ECC's overall strategy. Not enough detailed evidence to change the Plan currently, but CCC will review after Pre-Submission consultation.
The plan is informed by an up to date and proportionate flood risk evidence base including Level 1 and 2 SFRAs and Sequential & Exception Test supported by detailed modelling. The flood risk reports make use the most recent national policy and legislation available at the time of writing (Autumn 2024, pre the 12th December 2024 NPPF) and are informed by discussions with the Environment Agency, considers risks from all sources of flooding and include climate change modelling of surface water risk and fluvial risk from Sandon Brook.
As stated in the NPPF, the exception test is a method used to demonstrate that flood risk to people and property will be managed appropriately, where alternative sites at a lower flood risk are not available. The exception test is applied following the sequential test.
The Local Plan is informed by an Air Quality Assessment 2024 which overall concludes that the impact of the Local Plan in 2041 can be considered negligible for all pollutants.
Natural England has confirmed to CCC that they are not taking on any additional new Area of Outstanding Natural Beauty (AONB) designation projects at the current time. They have also advised that there is no formal application process for National Park or National Landscape (AONB) designation and that any future search will be England-wide. As such, the site allocation is not considered premature and Natural England are not objecting to the site allocation in principle. A copy of the Natural England letter confirming their position in December 2023 is attached at Appendix 3.
Where relevant design guidance in the Sandon Neighbourhood Plan will be used to assist in the Masterplanning and planning application process for the site. No changes required.
To meet our development needs it is inevitable that some agricultural land will be used for development.
The site a greenfield site but not 'Green Belt' land, where different planning policy and guidance applies.
Policy S7 tested a range of reasonable alternative options and sites. Alternative spatial strategies and sites for allocation in the Local Plan are covered in more detail within the Spatial Strategy Topic Paper and IIA.
The delivery of Site 16b is not conditional upon the masterplan of Site 16a. They can come forward independently of one another. The expected delivery timeframe is therefore considered reasonable. No changes required.
The policy requires the development to avoid ecological impacts and provide on-site ecological mitigation, compensation and enhancement measures. With the Reasoned Justification setting out that ecological assets on the site shall be maintained and enhanced, with the local wildlife sites Old Hare Wood to the north east and Sandon Pit to the south being protected. The design of the scheme should also enhance and protect Sandon Brook, which runs along the eastern

boundary of the site, and which is recognised as being important for biodiversity. No changes required.
Relevant buildings on site will be required to be built in accordance with Policy DM31 to ensure they are built in a sustainable manner. The Plan should be read as a whole, so no changes required.

Location 10 – South Woodham Ferrers

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Location 10 – South Woodham Ferrers	2	5	25	25

Summary of Representations – main issues and suggested changes:

- Support expressed (Sport England)
- Traffic concerns from this site and other sites proposed in both Chelmsford and Maldon
- Proposed capacity improvements on A132/B1012 are not sufficient
- Retail offer in SWF is limited, increasing the retail offering would provide employment opportunities
- Improve bus services that connect to Chelmsford, Baddow, Danbury and Bicknacre and employment areas
- Better pedestrian and cycle connection is needed including safe crossing points on Burnham Road
- Rail service is at capacity with little or no potential for future expansion (South Woodham Ferrers Residents Party)
- Increase inclusivity for accessibility and teens/young adults
- Flooding concerns
- New education and healthcare facilities are needed
- Habits have changed following Covid. Use more brownfield sites for housing need and retain green space for future generations and wildlife (South Woodham Action Group)
- Create a public woodland north of the site managed in perpetuity to encourage habitat improvement and countryside access (South Woodham Ferrers Residents Party)
- Minor policy change suggested to policy and supporting text to add ‘and police facilities as required by Essex Police’ (Essex Police)
- Refer to `multifunctional’ green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Amend to reflect the provision of proportionate financial contributions towards the co-located primary and early years nursery (Essex County Council)
- Refer to active and sustainable travel (Essex County Council)
- Provide a safe traffic free environment around school pedestrian entrances in line with in ECC’s Developers’ Guide to Infrastructure Contributions (Essex County Council)

- Support expressed but policy should remain generic in terms of its requirements including around 1,200 homes, around 1,000 sqm, avoid ‘maximise’, and for proposals to generally accord with an approved masterplan (Vistry Group)
- Amend to ensure CIL compliant requirements and reflect evidence provided with the recent planning application in terms of infrastructure (Vistry Group)
- There is limited capacity for growth at SWF Water Recycling Centre. Policy should require the need to demonstrate sufficient capacity for wastewater treatment and disposal to serve the site, including sewer connections and mitigation within the sewerage network (Anglian Water)
- The South East (Inshore) Marine Plan must be considered and a Marine Conservation Zone (MCZ) assessment may need to be undertaken. Project-level Habitats Regulations Assessment (HRA) must consider all impacts taken alone or in combination (Natural England)
- Refer to the marine/coastal/intertidal element particularly where both terrestrial and marine habitats have the potential to be impacted by the policy and interpretation of the South East Marine Plan (Marine Management Organisation)
- Expand policy to require the development to prepare a strategy for responding to the National Grid Electricity Transmission plc (NGET) overhead transmission lines within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design (National Grid Electricity Transmission).

CCC response to the comments made
Reference added to the Policy relating to layout responding to overhead transmission lines.
Changing the requirement from maximising sustainable travel would make the policy less effective; reference added to active and sustainable travel.
The Policy and Reasoned Justification have been adjusted to refer to facilities alongside infrastructure, and to police, ambulance and fire and rescue.
Text relating to provision of education has been clarified.
Any revised or subsequently approved masterplan would be the relevant and up to date masterplan against which development proposals would be assessed.
Infrastructure requirements are sufficiently flexible to accommodate on-site provision or financial contributions.
Reference to marine and terrestrial planning is addressed in Section 1 – adding here would be repetition.
Policy amended to demonstrate that there is sufficient capacity for wastewater treatment and disposal to serve the site, including any associated sewer connections and any required mitigation within the sewerage network.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
The amount and type of development reflects the resolution to grant planning permission and the number is reflected in the 5 year Housing Sites Schedule April 2024. If this permission is not implemented and a new proposal comes forward, the site capacity will be considered on its individual merit.

Location 11 – Bicknacre

Growth Site 11a – South of Bicknacre

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site 11a – South of Bicknacre	1	2	8	8

Summary of Representations – main issues and suggested changes:

- Support for 42 new homes whilst acknowledging the adopted plan was for 35 new homes (Woodham Ferrers and Bicknacre Parish Council)
- The site is near Thrift Wood SSSI and all identified impacts on the designated features of the SSSI will need to be considered. The cumulative effect on Thrift Wood SSSI of all the Bicknacre sites should be considered (Natural England)
- Minor policy changes suggested relating to green and blue infrastructure, education provision and pedestrian and cycle connections (Essex County Council)
- There are woodlands on the site or nearby including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Decisions should be made in line with the NPPF. The Council is also referred to Natural England and Forestry Commission's Standing Advice on Ancient Woodland (Forestry Commission England)
- Amend to reflect what has occurred on site, including the removal of large sections of hedgerow along the Main Road
- Insufficient infrastructure to support the development, including lack of public transport, the condition of roads and capacity at doctors' surgery
- Will place further strain on existing facilities
- Traffic, congestion, noise, light and road safety concerns during the construction phase of the development.

CCC response to the comments made
The site has been built-out as is therefore deleted from the plan.

Growth Site 11b – Land at Kingsgate, Bicknacre

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site 11b – Land at Kingsgate, Bicknacre	0	54	64	64

Summary of Representations – main issues and suggested changes:

- Object to the allocation. Reasons include the requirement for further housing in Bicknacre has already been satisfied since the adoption of the existing Local Plan (2020) and we are discussions to find an affordable housing site; any further housing need could be accommodated at Hammonds Farm or elsewhere; flooding concerns and drainage capacity and loss of Grade 3 agricultural land (Woodham Ferrers and Bicknacre Parish Council)
- All Bicknacre sites should take account of the cumulative effect on Thrift Wood SSSI (Natural England)
- There are woodlands on the site or nearby including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Decisions should be made in line with the NPPF. The Council is also referred to Natural England and Forestry Commission's Standing Advice on Ancient Woodland (Forestry Commission England)
- The site is approximately 300m of Bicknacre Priory Scheduled Monument. A Heritage Impact Assessment (HIA) should be undertaken in advance of Regulation 19 to determine whether the site is suitable for allocation, to inform its capacity, and to identify any necessary mitigation and enhancement measures. If the site is deemed suitable it is expected that mitigation and enhancement measures are incorporated into the Policy (Historic England)
- Minor policy changes suggested relating to education provision for clarification and consistency (Essex County Council)
- Insufficient infrastructure to support the development, including lack of public transport, police and fire services, the condition of roads and capacity at doctors' surgery and the school
- Will place further strain on existing facilities and utilities
- Bicknacre has met its housing requirement with circa. 77 new homes being built/under construction and further affordable housing may be delivered – the village does not need more housing/there is sufficient housing to meet local need
- Increase in traffic, congestion and on street parking and the degradation of the condition of existing roads – concerns on pedestrian and road safety and quality of life
- Impact on settlement character and the community
- Concerns on flooding, including Sandon Brook overflowing
- Drainage issues/lack of capacity and sewerage concerns
- Loss of agricultural land
- Impact on wildlife and their habitats
- Noise and air pollution impacts – Chelmsford's Air Quality Strategy June 2022 is out of date and air pollution is likely to increase
- Concerns on pedestrian safety, including children and the vulnerable and the lack of/suitable existing footways within the village
- Impact on adjacent bridleway
- Concerns on antisocial behaviour
- Traffic, congestion, noise, light and road safety concerns during the construction phase of the development.

CCC response to the comments made

The site allocation is supported by the plan evidence base including a Strategic Flood Risk Assessment, Landscape Sensitivity and Capacity Study 2024 and traffic modelling. The Small Sites Planning Briefs/Concept Framework 2024 considers that there are no overriding site constraints which mean that the site is unsuitable or undeliverable.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
To meet our development needs it is inevitable that some agricultural land will be used for development.
Site policy includes new requirements to undertake an archaeological assessment and to assess, and where appropriate mitigate, the potential cumulative effect on the designated features of Thrift Wood SSSI.
The 'small sites' (under 1ha) are an important part of the Plan to ensure delivery of a variety of sites in a timely manner, and to meet NPPF requirements to provide 10% of small sites. The enlargement of these sites would be likely to put greater pressure on local facilities and infrastructure which could make such sites unsuitable for development.
Heritage Impact Assessments have been undertaken and were published alongside the Preferred Options Local Plan. Site policies consider significance of designated and non-designated heritage assets.
The site policy requires financial contributions to services and facilities including education and healthcare provision, and to provide appropriate improvements, as necessary to the local and strategic road network.
The Local Plan is informed by an Air Quality Assessment 2024 which overall concludes that the impact of the Local Plan in 2041 can be considered negligible for all pollutants.
Policy DM17 provides protection for preserved woodlands.
Minor policy amendment made in respect to requirements for education provision.

Growth Site 11c – Land West of Barbrook Way, Bicknacre

Key statistics:

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
Growth Site 11c – Land West of Barbrook Way, Bicknacre	0	104	123	123

Summary of Representations – main issues and suggested changes:

- Support in principle but a greater site area and quantum of development should be allocated. The allocation ignores the Council's evidence base of the site's suitability and sustainability to deliver more houses – the wording of the policy is not justified or effective (Wellbeck Strategic Land V Limited)
- Consider the criteria of the Strategic Housing and Employment Land Availability Assessment has been applied inconsistently – the site should score higher (Wellbeck Strategic Land V Limited)
- Object to the allocation. Reasons include the requirement for further housing in Bicknacre has already been satisfied since the adoption of the existing Local Plan (2020) and we are discussions to find an affordable housing site; any further

housing need could be accommodated at Hammonds Farm or elsewhere; flooding concerns and drainage capacity; loss of Grade 3 agricultural land and there is a ransom strip between Barbrook Way and the site so the site is not deliverable (Woodham Ferrers and Bicknacre Parish Council)

- All Bicknacre sites should take account of the cumulative effect on Thrift Wood SSSI (Natural England)
- There are woodlands on the site or nearby including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Decisions should be made in line with the NPPF. The Council is also referred to Natural England and Forestry Commission's Standing Advice on Ancient Woodland (Forestry Commission England)
- Development would not affect any designated heritage assets (Historic England)
- Minor policy changes suggested relating to education provision for clarification and consistency (Essex County Council)
- Insufficient infrastructure to support the development, including lack of public transport, police and fire services, the condition of roads and capacity at doctors' surgery and the school
- Will place further strain on existing facilities and utilities
- Bicknacre has met its housing requirement with circa. 77 new homes being built/under construction and further affordable housing may be delivered – the village does not need more housing/there is sufficient housing to meet local need
- Increase in traffic, congestion and on street parking and the degradation of the condition of existing roads – concerns on pedestrian and road safety and quality of life
- Impact on settlement character and the community
- Concerns on flooding, including Sandon Brook overflowing
- Drainage issues/lack of capacity and sewerage concerns
- Loss of Grade 3 agricultural land – the site has always been used for animal grazing
- Impact on wildlife and their habitats
- Disagree with the site's rating in the Strategic Housing and Employment Land Availability Assessment – it has been incorrectly scored and should be lower
- Impact on neighbour amenity
- Junction/road safety concerns, including the location of the drop off point of The Sandon School bus at Barbrook Way/Priory Road
- Noise and air pollution impacts – Chelmsford's Air Quality Strategy June 2022 is out of date and air pollution is likely to increase
- Concerns on pedestrian safety, including children and the vulnerable and the lack of/suitable existing footways within the village
- There is a ransom strip at the entrance at the site – the site is not deliverable
- Site contributes to community wellbeing
- Concerns on soil composition and subsidence
- There is a water main running through the site – homes cannot be built on this or within its easements
- Concerns for protected trees within and near the site
- Concerns on antisocial behaviour

- Heritage impacts
- Traffic, congestion, noise, light and road safety concerns during the construction phase of the development.

CCC response to the comments made
The site allocation is supported by the plan evidence base including a Strategic Flood Risk Assessment, Landscape Sensitivity and Capacity Study 2024 and traffic modelling. The Small Sites Planning Briefs/Concept Framework 2024 considers that there are no overriding site constraints which mean that the site is unsuitable or undeliverable.
The Local Plan is informed by an Air Quality Assessment 2024 which overall concludes that the impact of the Local Plan in 2041 can be considered negligible for all pollutants.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
The Council is confident that the site can be accessed from Barbrook Way and that the site is deliverable – see Appendix 4 for a letter from the site promoters' Welbeck Land.
To meet our development needs it is inevitable that some agricultural land will be used for development.
Site policy includes new requirements to undertake an archaeological assessment and to assess, and where appropriate mitigate, the potential cumulative effect on the designated features of Thrift Wood SSSI.
The 'small sites' (under 1ha) are an important part of the Plan to ensure delivery of a variety of sites in a timely manner, and to meet NPPF requirements to provide 10% of small sites. The enlargement of these sites would be likely to put greater pressure on local facilities and infrastructure which could make such sites unsuitable for development.
Heritage Impact Assessments have been undertaken and were published alongside the Preferred Options Local Plan. Site policies consider significance of designated and non-designated heritage assets.
The site policy requires financial contributions to services and facilities including education and healthcare provision, and to provide appropriate improvements, as necessary to the local and strategic road network.
Policy DM17 provides protection for preserved woodlands.
The site policy requires the retention of existing natural landscaping and trees on the boundary of the site.
Minor policy amendment relating to requirements for education provision.

Location 12 – St Giles, Bicknacre

Growth Site 12 – St Giles, Moor Hall Lane, Bicknacre

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Growth Site 12 – St Giles, Moor Hall Lane, Bicknacre	1	1	5	5

Summary of Representations – main issues and suggested changes:

- Support the allocation (Woodham Ferrers and Bicknacre Parish Council)
- Minor policy changes suggested relating to 'multifunctional' green infrastructure and pedestrian and cycle connections (Essex County Council)
- All Bicknacre sites should take account of the cumulative effect on Thrift Wood SSSI (Natural England)
- Limited existing infrastructure to support the development, including public transport, the condition of road and capacity at doctors' surgery
- Will place further strain on existing facilities.

CCC response to the comments made
Minor policy wording changes to refer to 'multifunctional' green infrastructure and to 'safe and convenient' pedestrian and cycle connections.
Site policy includes new requirements to undertake an archaeological assessment and to assess, and where appropriate mitigate, the potential cumulative effect on the designated features of Thrift Wood SSSI.
The site policy requires financial contributions to services and facilities including healthcare provision, and to provide appropriate improvements, as necessary to the local and strategic road network.
The site policy requires the development is provide, or make financial contributions to, new or enhanced sport, leisure and recreation facilities.

Location 13 – Danbury

Strategic Growth Site Policy 13 – Danbury

Key statistics:

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
Strategic Growth Site Policy 13 – Danbury	1	3	9	9

Summary of Representations – main issues and suggested changes:

- Add additional text in relation to safe and convenient pedestrian and cycle connections, and active and sustainable travel (Essex County Council)
- Include reference to traffic management measures at Eves Corner (Essex County Council)
- Add reference to the proximity to proposed schools and social infrastructure offered by the Hammonds Farm proposal (Wates Developments and Hammonds Estates LLP)
- Recommend an additional policy to recognise the cumulative recreational pressure on SSSIs and wildlife sites (Natural England)
- There are woodlands on or in proximity to the allocation including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Decisions should be made in line with the NPPF and the

Council is referred to the Natural England and Forestry Commission's Standing Advice on Ancient Woodland (Forestry Commission England)
- Allocation is welcomed but it could deliver a greater number of homes (Martin Grant Homes)
- New housing could come forward in Danbury outside of the Neighbourhood Plan process if housing needs are not being met within an expected timeframe (Richborough)
- Concern about the recreational pressure and physical damage on vulnerable sites and land within the National Trust's ownership (National Trust)
- Additional site is promoted off Runsell Lane (Gleeson Land).

CCC response to the comments made
Bullet added to require contributions towards addressing cumulative recreational pressure on SSSIs in proximity to sites; and Reasoned Justification clarified on how measures will be costed.
Reference added to safe and convenient pedestrian and cycling connections.
Text relating to traffic management measures at Eves Corner has been updated.
Policies S4 and DM17 protects sites of international, national, regional and local nature conservation importance including Ancient Woodlands.
The allocation of around 100 homes is supported by the plan evidence base including a Strategic Flood Risk Assessment, Landscape Sensitivity and Capacity Study 2024 and traffic modelling.
Policy has been expanded to require contributions towards addressing cumulative recreational pressure on SSSIs in proximity to the site.

Location 17 – East Hanningfield

Growth Site 17a – Land North of Abbey Fields, East Hanningfield

Key statistics:

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
Growth Site 17a – Land North of Abbey Fields, East Hanningfield	1	16	18	18

Summary of Representations – main issues and suggested changes:

- Support the allocation and policy requirements, subject to the relevant legislation and planning policy (Chelmsford Diocese Board of Finance)
- A greater quantum of development may be possible on the site (Chelmsford Diocese Board of Finance)
- The delivery of site could be within two years of the adoption of the Local Plan (Chelmsford Diocese Board of Finance)
- Development would not affect any designated heritage assets (Historic England)
- Minor policy changes suggested relating to education provision for clarification and consistency (Essex County Council)
- Development would be out of keeping with the existing settlement pattern

- Impact on local services
- Lack of public transport
- Site access is below standards
- Junction/road safety concerns
- Concerns on flooding
- Increase/exacerbation of traffic, congestion and on street parking in Abbey Fields
- No sewerage capacity
- Loss of wildlife habitat/impact on biodiversity, trees (including preserved trees) and landscaping
- Noise and pollution impacts
- A right of access by the owners of the adjacent field may impact on the allocation.

CCC response to the comments made
Minor policy amendment relating to requirements for education provision.
The site allocation is supported by the plan evidence base including Strategic Flood Risk Assessments, Water Cycle Studies, Landscape Sensitivity and Capacity Study, new Air Quality Assessment and traffic modelling. The Small Sites Planning Briefs/Concept Framework 2024 considers that there are no overriding site constraints which mean that the site is unsuitable or undeliverable.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
The 'small sites' (under 1ha) are an important part of the Plan to ensure delivery of a variety of sites in a timely manner, and to meet NPPF requirements to provide 10% of small sites. The enlargement of these sites would be likely to put greater pressure on local facilities and infrastructure which could make such sites unsuitable for development.
Heritage Impact Assessments have been undertaken and were published alongside the Preferred Options Local Plan. Site policies consider significance of designated and non-designated heritage assets.
The site policy requires financial contributions to services and facilities including education and healthcare provision, and to provide appropriate improvements, as necessary to the local and strategic road network.
The site policy requires the character, scale and layout of the development to have regard and respond to the site's surrounding context.
The site policy requires the retention of existing natural landscaping and trees in and on the boundary of the site.

Growth Site Policy 17b – Land East of Highfields Mead, East Hanningfield

Key statistics:

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
Growth Site Policy 17b – Land East of Highfields Mead, East Hanningfield	1	15	18	18

Summary of Representations – main issues and suggested changes:

- Support the allocation (Hawridge Land and Mrs A Mossman)
- The allocation boundary should reflect the total site area (circa 1.25ha) and the quantum of housing should be flexible/increased (circa 30-35 dwellings) to maximise the site's deliverability (Hawridge Land and Mrs A Mossman)
- Development would not affect any designated heritage assets (Historic England)
- Minor policy changes suggested relating to education provision for clarification and consistency (Essex County Council)
- Limited existing infrastructure to support the development, including public transport and capacity at doctors' surgery and school
- Loss of wildlife habitat/impact on biodiversity, trees and landscaping
- Increase in traffic, congestion and on street parking
- Concerns on pedestrian safety
- Concerns on flooding and drainage
- Impact on settlement character
- Impact on neighbour amenity
- No sewerage and water capacity
- Noise and pollution impacts.

CCC response to the comments made
The site allocation is supported by the plan evidence base including Strategic Flood Risk Assessments, Water Cycle Studies, Landscape Sensitivity and Capacity Study, new Air Quality Assessment and traffic modelling. The Small Sites Planning Briefs/Concept Framework 2024 considers that there are no overriding site constraints which mean that the site is unsuitable or undeliverable.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
The 'small sites' (under 1ha) are an important part of the Plan to ensure delivery of a variety of sites in a timely manner, and to meet NPPF requirements to provide 10% of small sites. The enlargement of these sites would be likely to put greater pressure on local facilities and infrastructure which could make such sites unsuitable for development.
Heritage Impact Assessments have been undertaken and were published alongside the Preferred Options Local Plan. Site policies take into account significance of designated and non-designated heritage assets.
The site policy requires financial contributions to services and facilities including education and healthcare provision, and to provide appropriate improvements, as necessary to the local and strategic road network.
The site policy requires the retention of existing natural landscaping and trees on the boundary of the site.
Minor policy amendment relating to requirements for education provision.

Special Policy Areas (SPA)

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Special Policy Areas (paragraphs 7.464-7.465)	0	0	0	0
SPA1 – Broomfield Hospital Special Policy Area	0	1	1	1
SPA2 – Chelmsford City Racecourse Special Policy Area	0	0	1	1
SPA3 – Hanningfield Reservoir Special Policy Area	0	1	3	3
SPA4 – RHS Hyde Hall Gardens Special Policy Area	0	0	2	2
SPA5 – Sandford Mill Special Policy Area	1	0	3	3
SPA6 – ARU Writtle Special Policy Area	2	1	7	7

SPA1 – Broomfield Hospital Special Policy Area

Summary of Representations – main issues and suggested changes:

- Support SPA rationale. Designate the former BAE Systems site as a SPA given its unique and historical context and potential need to provide future specialist electronic technology floorspace related to defence (Rosehart Properties Ltd).

SPA2 – Chelmsford City Racecourse Special Policy Area

Summary of Representations – main issues and suggested changes:

- For consistency with other parts of the plan, amend policy to refer to ‘active and sustainable means of travel’ (Essex County Council).

SPA3 – Hanningfield Reservoir Special Policy Area

Summary of Representations – main issues and suggested changes:

- Welcome involvement early in application process to comment on details of avoidance and mitigation measures deemed necessary for proposed developments that may impact on Hanningfield Reservoir SSSI (Natural England)
- Support SPA policy approach but expand policy to include proposals for renewable energy which would reduce reliance on the grid and contribute towards achieving climate change goals (Essex & Suffolk Water)
- Remove policy requirement to show a demonstrable need for a renewable energy scheme as the treatment works is a regulated industry (Essex & Suffolk Water)
- Delete requirement for very special circumstances for water infrastructure and ancillary development to demonstrable need and be directly associated with

the role, function and operation of the operation of the site (Essex & Suffolk Water)
- Include new text to support, in principle, appropriate proposals including additional infrastructure requirements linking the site to the wider water infrastructure network, renewable energy and leisure activities (Essex & Suffolk Water).

SPA4 – RHS Hyde Hall Gardens Special Policy Area

Summary of Representations – main issues and suggested changes:

- For consistency with other parts of the plan, amend policy to refer to 'active and sustainable means of travel' (Essex County Council)
- RHS Hyde Hall causes significant traffic congestion at its special events, this will worsen as it expands but there is no provision to address this or improve the access road in application 21/01961/OUT.

SPA5 – Sandford Mill Special Policy Area

Summary of Representations – main issues and suggested changes:

- For consistency with other parts of the plan, amend policy to refer to 'active and sustainable means of travel' (Essex County Council)
- Fully support. This SPA needs to move forward as quickly as possible (Essex Waterways Ltd).

SPA6 – ARU Writtle Special Policy Area

Summary of Representations – main issues and suggested changes:

- Support. The facility is located within Writtle Key Service Settlement and is significant for educational excellence and driving the local economy. As such, the plan should provide new housing allocations near the ARU campus (Vistry Group)
- For consistency with other parts of the plan, amend policy to refer to 'active and sustainable means of travel' and 'safe and convenient' cycling and walking connectivity (Essex County Council)
- Expand to note the importance of ARU Writtle to supporting local employment to reduce inequality, opportunities to shift to a greener economy and investment into the rural economy (Essex County Council)
- Support the policy principles but the current designation will not ensure future development reflects the operational and functional requirements of ARU Writtle. The need for its growth and success is reflected throughout the plan. As such, amend policy to acknowledge that ARU intends to grow and expand to sustain its long-term future success and to delete the requirement to identify a 'demonstrable need' every time an application is determined (ARU)
- Expand the SPA boundaries of the Titchmarsh Campus and Rural Education and Training Centre along Cow Watering Lane to reflect the new and improved facilities/development that will be required (ARU)

- Inclusion of the Titchmarsh Campus does not affect any designated heritage assets (Historic England)
- Support sympathetic improvements to the ARU Writtle site in line with Green Belt policy. The Norwich to Tilbury powerline proposals will have a significant impact on ARU Writtle (Writtle Parish Council).

CCC response to the comments made
Changes proposed for SPA3 including deleting the requirement for water infrastructure and ancillary development to demonstrable very special circumstances have not been taken forward as this would contradict national planning policy.
Policy SPA2, SPA3, SPA4, SPA5 and SPA6 have been amended to include active and sustainable means of transport
Policy SPA6 has been updated to include reference to National Cycle Route 1 which runs through the site.
Policy and SPA boundaries has been amended to include the Titchmarsh Campus.
Reference to 'demonstrable need' in SPA6 has not been removed as this was retained at the previous Local Plan examination.

Protecting and Securing Important Assets

This section of the consultation document provides other non-strategic policies of the Local Plan that will shape Chelmsford's development opportunities whilst protecting its important physical attributes.

Securing the right types of homes

Key statistics:

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
Policy DM1 – Size and Type of Housing	3	9	20	20
Policy DM2 – Affordable Housing and Exception Sites	3	4	19	19
Policy DM3 – Policy DM3 – Gypsy, Traveller and Travelling Showpeople Sites	2	0	3	3

Policy DM1 – Size and Type of Housing

Summary of Representations – main issues and suggested changes:

- Support for the requirement for 100% of all new homes to be accessible and adaptable to enable people to live independently for longer (Mid and South Essex Integrated Care Board, Essex County Council, Dominus Chelmsford Limited)
- ECC has commissioned `Supported and Specialist Housing and Accommodation Needs Assessment' which will inform the Specialist

Residential Accommodation requirements when complete (Essex County Council)

- Give more support and priority to build to rent (Wates Development and Hammonds Estates LLP, Dominus Chelmsford Limited)
- Self and custom build plots should be taken forward on standalone sites not part of strategic housing allocations (Bloor Homes – Eastern)
- The 5% requirement for self and custom build plots should be capped at 5% (Bloor Homes – Eastern)
- Self-build homes should be encouraged rather than required by evidence of local need (Whirledge & Nott, Croudace)
- The impact of self-build homes on development viability should also be considered (Whirledge & Nott, Croudace)
- The Specialist Residential Accommodation requirement is too generic and needs to specifically allocate land to meet older persons housing need identified in the SHNA (Bloor Homes – Eastern, Sedum Ltd)
- Provision of Specialist Residential Accommodation for older and disabled people is too low to meet the identified needs and does not provide enough certainty that these needs will be met in a planned way which supports the optimum arrangement of support services (Lewis and Scott Retirement Living)
- A dedicated specialist housing policy which allows development adjacent to defined settlement boundaries would be more effective (Lewis and Scott Retirement Living)
- The process for determining when a commuted sum in lieu of on-site provision of Specialist Residential Accommodation is acceptable, how the sums will be used and what part ECC plays in this should be clarified (Essex County Council)
- All new homes should be required to have solar panels built in (Sandon Parish Council)
- Disagree with the requirement for 100% of new dwellings to be accessible and adaptable based on the additional cost of achieving these standards (Chelmsford Garden Community Consortium, Vistry)
- The policy might become outdated as building regulations and market requirements evolve across the plan period (Higgins Group, Hill Residential Limited)
- Need to justify requiring 100% of all new homes to be accessible and adaptable as it is not currently a requirement and if it does become a requirement, it does not need to be included in policy (Home Builders Federation, Dandara, Bellway)
- The requirement for 100% accessible and adaptable homes should only apply to houses and ground floor flats (Chelmer Housing)
- Set a requirement that a percentage of market homes are wheelchair accessible (Mid and South Essex Integrated Care Board)
- Specify M4(3)b to ensure the wheelchair housing is provided with adaptions already in place on completion (Chelmer Housing)
- The Specialist Residential Accommodation and self-build requirements should not apply to 100% affordable housing or affordable-led development and sites should be allocated to meet these needs rather than a requirement on strategic sites (Chelmer Housing)

- The changes to Table 4 in terms of specifying a range, not a specific percentage mix, of housing is supported but flexibility should be increased to 10 percentiles and include a link to the most recent evidence base (Dandara)
- Include Table 4 in the policy to ensure it is adhered to (Dandara PO24-9372)
- Include additional policy text to enable a flexible approach to the mix in Table 4 (Higgins Group, Hill Residential Limited, Dominus Chelmsford Limited)
- Need a clearer distinction between greenfield strategic allocations and urban developments on the requirement for and provision of housing mix, Specialist Residential Accommodation and self-build homes (Dominus Chelmsford Limited)
- Flawed assumptions underpin the Council's viability assessment and the evidence for conclusions in para. 8.6 on the viability of Build to Rent schemes is unsound (Dominus Chelmsford Limited)
- Proposal for a different mix of affordable housing expressed as a percentage range that should apply to all affordable housing tenures (Chelmer Housing)
- Explain the policy thresholds in supporting text (Whirledge & Nott, Croudace)
- Include a co-living policy to avoid potential appeals or unregulated forms of co-living. Wording for a dedicated policy provided (Highgate Capital Limited)
- Include reference to the Nationally Designed Space Standards or greater (Chelmer Housing).

CCC response to the comments made
Various policy amendments have been made including requiring 50% of new dwellings to be accessible and adaptable dwellings (Part A ii) and a new requirement for large greenfield sites to also provide older persons market housing.
How the sums will be used and what part Essex County Council will play in commuted sums in lieu of on-site provision of Specialist Residential Accommodation will be covered in Planning Obligations Supplementary Planning Document.
Requirements for the installation of solar panels on new homes is covered by Policy DM31.
The Planning Obligations Supplementary Planning Document will promote wheelchair user dwellings on ground floor in flatted schemes where possible, but the policy target is acceptable.
The Planning Obligations Supplementary Planning Document will encourage wheelchair accessible market homes in Specialist Residential Accommodation. This is supported by the updated Local Plan Viability Assessment, 2024.
The Planning Obligations Supplementary Planning Document will clarify that 100% affordable housing led schemes will be exempt from providing self-build requirements. The policy remains appropriate.
The policy thresholds are tested in the relevant evidence base documents and explained where not linked to an evidence base document.
The policy requirements reflect the most up to date national planning and guidance and the Local Plan evidence base including the latest Strategic Housing Needs Assessment (SHNA) (2023), including the 2024 addendum report.
The impact of self-build homes on development viability is considered in the updated Local Plan Viability Update, 2024.

The Local Plan Viability Update 2023 and 2024 has been undertaken in accordance with national policy and guidance and clearly sets out the balance of policy priorities.
The Council's expectations for co-living housing proposals will be set out in the Co-Living Housing Planning Advice Note which will be published for consultation in early 2025.
Requirements for all new dwellings to adhere to the Nationally Described Space Standards is addressed in Policy DM26.
The Local Plan will be reviewed every five years. This will address relevant changes such as changes to Building Regulations. Higher accessibility standards have been tested in the Local Plan Viability Update 2024 should Building Regulations change in the regard.

DM2 - Affordable Housing and Exception Sites

Summary of Representations – main issues and suggested changes:

- Support policy as drafted (Wates Developments and Hammonds Estates LLP)
- Support but amend to allow for the submission of a Viability Appraisal at application stage should there be any unique circumstances or changes to local market conditions (Bloor Homes (Eastern))
- Support but add to A) i that this is subject to viability to not undermine deliverability (Vistry Group)
- Support but unclear why community-led exception sites cannot include neighbourhood plan allocations (Broomfield Parish Council)
- Clarification sought on whether Broomfield is eligible for a Rural Exception Site following the Community Governance Review (Broomfield Parish Council)
- To not impact on the delivery of affordable homes, amend policy to state that First Homes will not be required on 100% affordable, affordable-led and rural exception site developments (Chelmer Housing Partnership (CHP))
- For clarification, add to para. 8.23 the requirements in terms of wider types of affordable (Chelmer Housing Partnership (CHP))
- To not jeopardise site viability, policy must recognise that a tenure mix in 2024 (at para. 8.23) will unlikely reflect the needs in subsequent years (Obsidian Strategic Asset Management Ltd)
- Policy should only allow 35% market homes to increase the number of genuinely affordable home supported by a return to council house building, suspension of the Right to Buy for 10 years and increased role for co-operative developers
- Policy should recognise that First Homes is not mandatory and no more than a material consideration (Obsidian Strategic Asset Management Ltd)
- Part ii is inconsistent with national policy and should be amended to expect the mix, size, type and cost of housing to have close regard to the most recent evidence on housing needs, such as the Strategic Housing Market Assessment and monitoring data (Home Builders Federation)
- Should be flexibility in the mix set out in para 8.23 especially on percentage discount on First Homes because of the national cap at £250,000 (Home Builders Federation)

- For clarification, amend policy to add where sites deliver 100% affordable schemes the revised mix should be 70% Affordable Rent, and 30% Shared Ownership and that the Local Housing Allowance cap should be removed on affordable rent where the site is delivered as 100% affordable or affordable-led development (Chelmer Housing Partnership (CHP))
- Table 5 should apply across all affordable tenures. Request that the affordable housing unit mix (including rent and shared ownership) is 1 Bed 5-10% 2 Bed 20-25% 3 Bed 40-50% 4 Bed 15-20% (Chelmer Housing Partnership (CHP))
- Clarify detail in Table 5 and that it is only to be used as a guide as opposed to absolute requirements in decision-making (Hill Residential Ltd, Higgins Group, Dandara)
- To ensure adherence with Table 5, add into the policy alongside a reference to using the most recent housing needs assessment (Dandara)
- A one-sized fits all 35% requirement discourages a brownfield first approach (Dominus Chelmsford Limited)
- Include reference to the national policy of Vacant Building Credit (Dominus Chelmsford Limited)
- To help the NHS recruit and retain staff, consider the need for affordable housing for NHS staff and those employed by other health and care providers in housing needs assessments, site selection and allocation policies (NHS Property Services Ltd)
- Amend to allow groups of affordable housing within large strategic allocations/development phases (rather than 'pepper potting') as this would achieve the policy's social objectives (Whirledge & Nott, Croudace Homes)
- Do not support. Amend policy to enable a viability case to be made at the planning application stage (Croudace Homes, Whirledge & Nott)
- Do not support. Amend policy to allow a transparent open book viability assessment to be undertaken and for development to come forward with an alternative approach to affordable housing delivery should site-specific viability matters arise at the planning application stage (Martin Grant Homes)
- Do not support. The Viability study should be re-run for sheltered and extra care housing incorporating our revised assumptions relating to for example, unit size, unit mix and non-chargeable/communal. This is likely to show that sheltered and extra care housing is unviable (McCarthy Stone)
- Consider the Retirement Housing Consortium paper 'A briefing note on viability' prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2016 ('RHG Briefing Note') (McCarthy Stone)
- An unprecedented housing crisis is currently affecting the Council, therefore a new policy DM2 Part C is proposed, which would supersede DM2 Parts A and B and come into force when more than 250 households are living in temporary accommodation, and it has been accepted by the Council that there is a duty to house them (Omtech Services Limited).

CCC response to the comments made
The policy requirements including those related to First Homes have been updated to reflect the Strategic Housing Needs Assessment (SHNA) 2024 addendum report.
Amendments added from the Planning Obligations Supplementary Planning Document to clarify how affordable housing should be designed within

developments to maximise tenure integration to achieve mixed, inclusive and sustainable communities
The policy requirements are supported by the Local Plan Viability Assessment, 2024.
Para. 73 of NPPF states that exception site for community-led housing should be on land which is not already allocated for housing – no change required to Policy DM1.
The rural exception site part of the policy relates to retention orders imposed by Statutory Instruments referenced in Planning Obligations Supplementary Planning Document.
Exemptions to First Homes requirements are set out in para. 66 of NPPF – no change required to Policy DM2.
The Local Plan will be reviewed every five years to reflect the most up to date national planning and guidance and any updated Local Plan evidence base.
Prioritisation mechanisms for First Homes will be set out in the updated Planning Obligations Supplementary Planning Document.
The 35% affordable housing requirement will help to address Chelmsford's housing crisis declared by the Council in 2022. Levels of homelessness also continue to rise and increasing the percentage of affordable housing on greenfield sites would be unviable. It is not necessary to introduce an additional threshold based on the numbers of households living in temporary accommodation but the proposed Housing Requirement is being increase, which in turn will increase affordable housing delivery across the plan period.
Changes have been made to explain the circumstances where the Council will consider a viability assessment at planning application stage.
Changes have been made to explain what the requirements for Affordable Private Rent dwellings in Build to Rent Schemes will be and the reasons for this.

Policy DM3 – Gypsy, Traveller and Travelling Showpeople Sites

Summary of Representations – main issues and suggested changes:

- Support (Wates Developments and Hammonds Estates LLP, Writtle Parish Council)
- Add 'Green Wedge' in (A)i to align with para. 8.42 (Broomfield Parish Council).

CCC response to the comments made
The policy requires new sites to be outside the Green Belt unless very special circumstances apply, in line with national planning policy. New text has been inserted to clarify that new sites shouldn't be in the Green Wedge unless it can be demonstrated that a development would not adversely impact on the role, function, character and appearance of the Green Wedge. Clarification has also been provided on new sites in the rural area not having a significant impact the intrinsic character and beauty of the countryside in the supporting / explanatory text.

Securing Economic Growth

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Policy DM4 – Employment Areas and Rural Employment Areas	7	0	8	8
Policy DM5 – Designated Centres	2	0	3	3

Policy DM4 – Employment Areas and Rural Employment Areas

Summary of Representations – main issues and suggested changes:

- Support for the policy (CNG Fuels Ltd, JH Farming Ltd, Pigeon Sandon Ltd, Wates Developments and Hammonds Estates LLP, Essex County Council)
- Expand policy criteria for allow redevelopment or changes of use from E(g), B2 and B8 Use Classes to uses which provide low carbon/renewable energy transport refuelling infrastructure" (CNG Fuels Ltd)
- Add additional text into para. 3 of the policy for proposals to consider opportunities to promote multifunctional green infrastructure (Essex County Council)
- Support for the approach but new allocations may not, per se, lead to overall economic growth if they lead to older premises becoming less attractive and lost through change of use (Basildon Borough Council)
- Consider amending to strengthen the policy for example, make it clearer that the redevelopment of existing employment areas should be for employment uses only and planning permission would only be granted for a change of use from employment where the first four criteria apply, and/or there is no reasonable prospect for the site to continue in those uses (Basildon Borough Council).

CCC response to the comments made
Policy adjusted to refer to multifunctional green infrastructure.
The criteria relating to redevelopment of existing uses offers flexibility and a positive approach as set out in the NPPF. Policy S2 supports development that provides opportunities for renewable and low carbon energy technologies and schemes so no changes are considered necessary to S8.
Policy already sets out the circumstances where redevelopment or change of use from E(g), B2 and B8 Use Classes will be granted.

Policy DM5 – Designated Centres

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP, Dominus)
- Car parking at South Woodham Ferrers must be protected if the town centre is to flourish.

CCC response to the comments made
There are no proposals affecting car parking in SWF in the plan.

Protecting the Countryside

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Policy DM6 – New Development in the Green Belt	2	0	6	6
Policy DM7 – New Buildings and Structures in the Green Wedge	7	1	14	14
Policy DM8 – New Buildings and Structures in the Rural Area	2	2	4	4
Policy DM9 – Infilling in the Green Belt, Green Wedge and Rural Area	1	0	4	4
Policy DM10 – Change of Use (Land and Buildings) and Engineering Operations	1	0	4	4
Policy DM11 – Extensions to Existing Buildings within the Green Belt, Green Wedge and Rural Area	1	0	4	4
Policy DM12 – Rural and Agricultural/Foresty Workers' Dwellings	1	0	3	3

Policy DM6 – New Development in the Green Belt

Summary of Representations – main issues and suggested changes:

- Support expressed (Chelmsford & Central Essex RSPB Local Group, and Wates Developments and Hammonds Estates LLP)
- Alter Green Wedge boundary and extend the western boundary of Widford Employment Area (Map 3) to support growth in this sustainable location, with existing transport and pedestrian links (Saxtons 4x4)
- Policy contradicts the strategy of resisting development in the Green Belt and contradicts the Settlement Hierarchy which confirms that settlements within the Green Belt are sustainable (Hill Residential Ltd and Higgins Group)
- Policy lacks clarity and fails to link to the strategic policies (Hill Residential Ltd and Higgins Group).

CCC response to the comments made
The Green Wedge is a locally important designation. Changes to the Green Wedge boundaries to allow development growth has been discounted as there is sufficient and suitable land elsewhere to meet development needs in a sustainable way.

The policy seeks to protect the Green Belt in accordance with National Planning Policy. The Settlement Hierarchy informs planning decisions in relation to the most sustainable settlements but does not override National Policy regarding Green Belt – no changes considered necessary.

Policy DM7 – New Buildings and Structures in the Green Wedge

Summary of Representations – main issues and suggested changes:

- Support expressed (Chelmsford & Central Essex RSPB Local Group, and Wates Developments and Hammonds Estates LLP, Broomfield Parish Council)
- An alteration to the Green Wedge boundary should be considered and an extension to Widford Employment Area (Map 3) allowed (Saxtons 4x4)
- For consistency with other parts of the plan refer to `active and sustainable travel' in criteria v (Essex County Council)
- In terms of C) replacement buildings within a floodplain, there is opportunity to seek betterment and long-term sustainability even if the flood hazard affecting existing development may not increase, this should be clarified in the policy (Environment Agency)
- Policy is overly restrictive without a detailed assessment to ensure land within the Green Wedge performs its intended purposes
- Be more flexible to residential development, particularly where it would provide opportunities to enhance the Green Wedge
- Supports the intentions behind the principle of the Green Wedge but questions the approach to the Green Wedge, when other less onerous planning policies can protect open countryside if the housing strategy is performing as it should (Obsidian Strategic Asset Management Ltd)
- Various comments from landowners/developers promoting their sites for development in the Green Wedge
- Expand policy to include small-scale commercial development that is sustainably located, accessible and well connected (Cliffords Group Ltd and Hill Farm (Chelmsford) Ltd).

CCC response to the comments made
For consistency with other parts of the Plan reference is made to 'active and sustainable travel' in Part A, criteria v.
The Green Wedge is a locally important designation. Changes to the Green Wedge boundaries to allow development growth has been discounted as there is sufficient and suitable land elsewhere to meet development needs in a sustainable way. No Green Wedge Review is required, and the deletion of Green Wedge policies would be inappropriate.
The Plan and its policies should be read as a whole. Flooding is covered by DM18 which requires measures to mitigate flood risk, safe means of escape, not increase flood risk elsewhere etc. Such issues will be addressed through site-specific Flood Risk Assessments – no changes considered necessary.
Policy will ensure that the Green Wedge is sufficiently protected and Part A, criteria vi allows for appropriate facilities e.g. for sport – no changes considered necessary.

The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.

Policy DM8 – New Buildings and Structures in the Rural Area

Summary of Representations – main issues and suggested changes:

- Support expressed (Chelmsford & Central Essex RSPB Local Group, and Wates Developments and Hammonds Estates LLP)
- Part B should be more flexible (Mr Parker)
- Address inconsistences regarding allowing new Buildings/Dwellings on Previously Developed Land (Mr Parker)
- Amend to refer to renewable energy and low carbon development, related transport infrastructure and specific locational requirements of different sectors to support the rural economy (CNG Fuels).

CCC response to the comments made
Requirements for renewable energy and low carbon development and transport infrastructure are adequately covered by Policies S2 and DM19. No changes considered necessary.
The policy is considered clear in how development on previously developed land will be considered. No changes considered necessary.

Policy DM9 – Infilling in the Green Belt, Green Wedge and Rural Area

Summary of Representations – main issues and suggested changes:

- Support expressed (Wates Developments and Hammonds Estates LLP)
- Policy needs to mention flood risk constraints (Environment Agency)
- Overly restrictive to development in the Green Wedge
- Unclear how a decision-maker will determine if a gap is ‘small’ and is contrary to the NPPF.

CCC response to the comments made
The Plan and its policies should be read as a whole. Flooding is already covered by DM18 which requires measures to mitigate flood risk, safe means of escape, not increase flood risk elsewhere etc. Such issues will be addressed through site-specific Flood Risk Assessments. No changes considered necessary.
The Reasoned Justification sets out how to determine a ‘small’ gap. No changes considered necessary.

Policy DM10 – Change of Use (Land and Buildings) and Engineering Operations

Summary of Representations – main issues and suggested changes:

- Support expressed (Wates Developments and Hammonds Estates LLP)
- Policy needs to mention flood risk constraints (Environment Agency)

- Refer to Policy S8 of the Essex Minerals Local Plan and emphasise the importance of effective early engagement with relevant site promoters (Essex County Council).

CCC response to the comments made
The Plan and its policies should be read as a whole. Flooding is already covered by DM18 which requires measures to mitigate flood risk, safe means of escape, not increase flood risk elsewhere etc. Such issues will be addressed through site-specific Flood Risk Assessments. No changes considered necessary.
Planning applications where consultation with the Minerals Planning Authority is required are already picked up at any relevant pre-application processes or the 'vetting' stage of a planning application. No changes considered necessary.

Policy DM11 – Extensions to Existing Buildings within the Green Belt, Green Wedge and Rural Area

Summary of Representations – main issues and suggested changes:

- Support expressed (Wates Developments and Hammonds Estates LLP)
- Policy needs to mention flood risk constraints (Environment Agency)
- Refer to Policy S8 of the Essex Minerals Local Plan and emphasise the importance of effective early engagement with relevant site promoters (Essex County Council).

CCC response to the comments made
The Plan and its policies should be read as a whole. Flooding is already covered by DM18 which requires measures to mitigate flood risk, safe means of escape, not increase flood risk elsewhere etc. Such issues will be addressed through site-specific Flood Risk Assessments. No changes considered necessary.
Planning applications where consultation with the Minerals Planning Authority is required are already picked up at any relevant pre-application processes or the 'vetting' stage of a planning application. No changes considered necessary.

Policy DM12 – Rural and Agricultural/Foresty Workers' Dwellings

Summary of Representations – main issues and suggested changes:

- Support expressed (Wates Developments and Hammonds Estates LLP)
- Policy needs to mention flood risk constraints (Environment Agency)
- Refer to Policy S8 of the Essex Minerals Local Plan and emphasise the importance of effective early engagement with relevant site promoters (Essex County Council).

CCC response to the comments made
The Plan and its policies should be read as a whole. Flooding is already covered by DM18 which requires measures to mitigate flood risk, safe means of escape, not increase flood risk elsewhere etc. Such issues will be addressed through site-specific Flood Risk Assessments. No changes considered necessary.

Planning applications where consultation with the Minerals Planning Authority is required are already picked up at any relevant pre-application processes or the 'vetting' stage of a planning application. No changes considered necessary.

Protecting the Historic Environment

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Policy DM13 – Designated Heritage Assets	3	0	3	3
Policy DM14 – Non-Designated Heritage Assets	2	0	2	2
Policy DM15 - Archaeology	0	1	2	2

Policy DM13 – Designated Heritage Assets

Summary of Representations – main issues and suggested changes:

- Support expressed (C J H Farming Ltd, Pigeon (Sandon) Ltd, Historic England).

CCC response to the comments made
No changes.

Policy DM14 – Non-Designated Heritage Assets

Summary of Representations – main issues and suggested changes:

- Support expressed (Historic England, Writtle Parish Council).

CCC response to the comments made
The policy has been updated to provide clarity in the considerations of identifying non-designated heritage assets in planning decisions.

Policy DM15 – Archaeology

Summary of Representations – main issues and suggested changes:

- Support expressed (Historic England)
- To reflect para. 8.128 and national policy, re-word the policy to recognise instances where the level of significance of the remains do not warrant protection, preservation or enhancement, and their loss could be justified. New policy text is proposed (Wates Developments and Hammonds Estates LLP).

CCC response to the comments made

Planning legislation and case law are based on preservation; therefore it is inappropriate to amend the wording.
Additional wording has been added to the policy and Reasoned Justification following the archaeological evidence base to clarity archaeological significance.

Protecting the Natural Environment

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Policy DM16 – Protection and Promotion of Ecology, Nature and Biodiversity	16	6	32	32
Policy DM17 – Trees, Woodland and Landscape Features	5	5	14	14
Policy DM18 – Flooding/SUDS	4	1	12	12
Policy DM19 – Renewable and Low Carbon Energy	2	1	6	6

Policy DM16 – Protection and Promotion of Ecology, Nature and Biodiversity

Summary of Representations – main issues and suggested changes:

- Support policy (Wates Developments and Hammonds Estates LLP, Dominus Chelmsford Limited, Natural England, (Pigeon (Sandon) Ltd, Chelmsford and Central Essex RSPB, Anglian Water)
- Local Plan should set criteria based policies to ensure the protection of designated biodiversity and geological sites. Such policies should clearly distinguish between international, national and local sites (Natural England)
- Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protection Areas) and Ramsar sites should be included on the Policies Map (Natural England)
- Reference to swift boxes and bricks is welcome but there is no indication which is preferable – policy change suggested to require swift bricks in accordance with best practice (Swifts Local Network: Swifts & Planning Group)
- Minor policy changes suggested relating to green infrastructure and reference to Essex Green Infrastructure Standards 2022 (Essex County Council)
- Would like to see a distinction between public green spaces and habitats for wildlife as it is not explicitly clarified (Environment Agency)
- Specify that native species should always be used for biodiversity landscaping/planting (Environment Agency)
- Plan makes no explicit preference to retaining riparian corridors as public open space over private gardens (Environment Agency)

- Add a link to the Essex LNRS in the policy (Anglian Water)
- Oppose the 20% BNG requirement on Garden Community sites as it exceeds national requirements (Bellway Homes, Bellway Strategic Land, Chelmsford Garden Community Consortium)
- No assessment of the cumulative impact of the 20% BNG requirement and the tree planting requirement (3 trees per dwelling) (Bellway Homes, Bellway Strategic Land)
- 20% BNG would undermine viability and significantly reduce the capacity of development sites which will impact the Council's growth requirements (Bellway Homes, Bellway Strategic Land)
- The viability impacts of the costs related to BNG habitat management and BNG credits has not been appropriately assessed. The Biodiversity Net Gain and Local Nature Recovery Strategies – Impact Assessment (BNG IA) is based on broad costs, not specific development sites and does not have up-to-date or realistic estimate costs (Dandara Eastern, Home Builders Federation)
- BNG IA makes no consideration to a potential reduction in the developable area to accommodate BNG provision – this assumption should be tested (Home Builders Federation)
- BNG IA underestimates the cost of delivery BNG off-site (Bellway Homes, Home Builders Federation)
- For typology testing, undertake sensitivity testing to understand the impacts of delivering BNG off-site (Home Builders Federation)
- Amend policy to clarify that developers would not be required to meet standards beyond national and local policy (Home Builders Federation)
- Concerns on the deliverability of providing 20% minimum on large sites, which are usually greenfield, as they usually have a relatively high BNG baseline value (Whirledge & Nott, Croudace Homes)
- The 20% biodiversity net gain requirement on large sites has not been justified in evidence base as being financially viable or practically deliverable/viable (Whirledge & Nott, Croudace Homes)
- The viability of delivery 20% BNG need to be tested locally and on current market prices (Chelmsford Garden Community Consortium, Vistry Group)
- 20% BNG should be expressed as a target/aspiration rather than a requirement (Whirledge & Nott, Croudace Homes, Chelmsford Garden Community Consortium, Vistry Group)
- No evidence demonstrating the implications of what a 20% (BNG) uplift would require and whether the proposed allocations can achieve this in comparison to omitted sites that have a stronger BNG potential (Obsidian Strategic Asset Management Ltd)
- More sites will be needed to deliver the Local Plan housing requirement as 20% BNG will reduce developable areas resulting in lower yield of dwellings on sites. Further work is needed with site promoters to identify sites (Obsidian Strategic Asset Management Ltd)
- Policy repeats the BNG requirements of Strategic Policy S4 and national policy – the policy should avoid unnecessary repetition/it is an unnecessary

duplication and remove references to the amount of BNG requirement (Dandara Eastern, Hill Residential Ltd, Higgins Homes)

- The requirement for Garden Communities to deliver 20% BNG should be clarified in terms of when it is delivered, i.e. per phase or on completion (Chelmsford Garden Community Consortium, Vistry Group)
- For Garden Communities the policy should require 10% BNG per phase with an aspiration of 20% overall net gain (Chelmsford Garden Community Consortium, Vistry Group)
- Policy should be flexible to take account of; site specific circumstances which may require off-site provision, the viability considerations of off-site vs. on-site and circumstances where off-site provision outside of the administrative may deliver substantial benefits (Chelmsford Garden Community Consortium, Vistry Group).

CCC response to the comments made
Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protection Areas) and Ramsar sites are shown on the Draft Policies Map.
Reasoned Justification has been amended to clarify the relationship between public open space and SANGS, and biodiversity net gain provision.
Reasoned Justification has been amended to include the use of native species for landscaping.
Reasoned Justification has been amended to include opportunities to retain riparian corridors as public open space.
Reasoned Justification has been amended to confirm that public open space requirements or the provision of SANGs are separate to biodiversity net gain and will not be considered as an alternative to or a replacement for net gain provisions, and that where possible, the provision of both on site should be segregated to ensure the quality of the habitat for wildlife is maximised.
The LNRS is at draft stage, and it is not considered appropriate to link to its specific priorities until they have been adopted.
Reasoned Justification has been expanded to clarify that major developments will be required to provide on-site measures in addition to paying the RAMS tariff to help mitigate increased recreational impacts on international coastal designated sites.
The policy requirements have been tested through the Local Plan Viability assessments.
Reasoned Justification has been amended to clarify where off-site provision will be considered.
The policy includes the BNG targets of 10% and 20% for clarity and completeness.
A range of biodiversity features that can be considered is included in the Reasoned Justification and in the Council's making Places SPD. Inclusion of a specific policy requirement to provide swift bricks is not supported. The use of swift boxes and/or bricks with depend on site-by-site circumstances and specifying a preference would be inappropriate.
Policy has been amended to note that the achievement of 20% biodiversity net gain on sites 6 and 16a will be subject to site constraints.

Policy DM17 – Trees, Woodland and Landscape Features

Summary of Representations – main issues and suggested changes:

- Support expressed (Chelmsford & Central Essex RSPB Local Group, Swifts Local Network: Swifts & Planning Group, Dandara, Pigeon (Sandon) Ltd)
- Consider adding to reasoned justification the contribution to the Big Green Internet Project that aims to connect woodlands from Tendring via Chelmsford to Epping Forest (Essex County Council)
- Add a reference to Ancient Woodlands and how they are irreplaceable habitats. As such, the policy requirement for replacement of trees of a "size and type suitable for location" may not be entirely appropriate (Forestry Commission)
- New development should consider any impacts on ancient woodland and ancient and veteran trees in line with the NPPF. Support for the Forestry Commissions conclusions (Natural England)
- Clarify the term 'preserved trees' and expand policy to include the strict protection of irreplaceable habitats (including ancient or veteran trees and ancient woodlands) as afforded by the NPPF (Wates Development and Hammonds Estates LLP)
- Amend policy to ensure existing nest sites for building-dependent species such as swifts and house martins are protected. Alternatively, mitigation should be provided (Swifts Local Network: Swifts & Planning Group)
- Part C – New Trees is supported but additional wording sought for Part C to ensure new tree planting is adequate (Wates Development and Hammonds Estates LLP)
- The requirements of Part C of three new trees per dwelling is questioned by a number of developers as:
    - Prioritising trees in the landscaping and layout may impact negatively on the design of a scheme (Dandara)
    - Quality of trees, specimen type and location best dictate tree coverage rather than a stringent quantum. For the Meadows, this would lead to over 2,400 trees which cannot be realistically accommodated (Dominus Chelmsford Ltd)
    - It may impact on viability and should be fully evidenced and considered along with the requirements for BNG (Obsidian Strategic Asset Management Ltd, Richborough, McCarthy and Stones)
- To avoid ambiguity, clarify 'significant' with regards the number of trees to be delivered on strategic employment sites (Pigeon (Sandon) Ltd, CNG Fuels).

CCC response to the comments made
The Reasoned Justification for DM16 has been amended to clarify irreplaceable habitats such as ancient woodland and ancient or veteran trees.
Policy covers ancient woodlands and aged and veteran trees found outside ancient woodlands.

Reasoned Justification has been amended to include the use of native species for landscaping.
Reasoned Justification has been to include opportunities to retain riparian corridors as public open space.
Protection for nesting birds is covered by separate legislation. However, the Reasoned Justification states that the presence of protected species is a material consideration when the Council is considering a development proposal which, if carried out, would be likely to result in harm to the species or its habitat – no further change considered necessary.
Reasoned Justification already states that trees for on-site planting will be determined by the size, position, and type of location available.
Reasoned Justification already states that a judgement will be made on a case by case basis over what will be considered 'significant' taking into account the nature, scale and size of the development, the site and immediate locality with more guidance to be set out in the Making Places SPD.
Reasoned Justification has been amended to clarify that a significant number of new trees on major new employment and infrastructure sites must be provided as part of landscaping requirements.
The policy requirements have been tested through the Local Plan Viability assessments.

Policy DM18 – Flooding/SUDS

Summary of Representations – main issues and suggested changes:

- Support expressed (Chelmsford & Central Essex RSPB Local Group, Wates Developments and Hammonds Estates LLP, Dominus Chelmsford Limited)
- Policy should not prohibit appropriate land uses such as open space or attenuation measures being in flood zones (Pigeon (Sandon) Ltd)
- Add 'unless it is demonstrated to be unviable' in relation to use of SuDS under Part C to ensure development viability is not undermined (CNG Fuels Ltd)
- Support the use of SuDS schemes where appropriate to support aquifer recharge and reduce flooding. However, use of infiltration SuDS is not appropriate on all sites. Recommend guidance be referenced: The Environment Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13; The CIRIA C753 SUDS Manual; The Susdrain website; The Sustainable Drainage Systems: Non-Statutory Technical Standards guidance on gov.uk and the Recommendations To Update (Environment Agency)
- Support the inclusion of SuDS into sites that may come forward for redevelopment and regeneration where such features would also be beneficial for the management of surface water flooding and environmental enhancement (Environment Agency)
- The policy should include: 'B) provide a safe dry refuge above the 0.1% (1 in 1000) AEP with allowance for climate change' and 'safeguarding land from development that is required, or likely to be required, for current or future flood management' (Environment Agency)

- Amend part B) ii) to clarify that brownfield sites will be treated as greenfield with discharge rates limited to the equivalent 1 in 1 year greenfield rate unless this is demonstrated as not practical (Anglian Water Services Ltd)
- Agree that opportunities for providing betterment should be explored on strategic and regeneration sites, and through retrofitting SuDS within existing urban areas at risk of surface water flooding (Anglian Water Services Ltd)
- Add reference to integrated water management measures such as rainwater/stormwater harvesting and reuse, to minimise potable water demands through utilising non-potable water for irrigation, and flushing toilets in residential properties (Anglian Water Services Ltd)
- Final paragraph of the policy is inadequate to address surface water connections to the public sewer network and amended wording suggested to reflect discharge of surface water following the sustainable drainage hierarchy (Anglian Water Services Ltd)
- Policy needs to have flexibility in approach and allow different techniques to address site specific characteristics. Integrate reference to the Lead Local Flood Authority into the policy (Higgins Group, Hill Residential Ltd)
- Amend section C to provide more consideration to the use of Green Infrastructure SuDS together to maximise benefits through multifunctionality (Essex County Council)
- Comment from landowners/developer suggesting that their proposed development site will accord with the preferred plan (Dandara).

CCC response to the comments made
The policy does not prevent development on sites at risk of flooding where they comply with the requirements of the policy and national planning policy and guidance.
In line with the NPPG, all new development is required to incorporate water management measures to reduce surface water run-off by using for example SuDS. The Pre-Submission plan is supported by an updated Viability Report (2024).
The policy supports using SuDS but is also flexible by allowing solutions for the disposal of surface water.
Various site policy changes have been made including new requirements to provide a safe dry refuge, to manage surface water run-off so that the discharge rate will not exceed the equivalent 1 in 1 greenfield rate, for rainwater / stormwater harvesting, to the sustainable drainage hierarchy, to include reference to the utilisation of Green Infrastructure, and to clarify surface water connections to the foul sewer.
A new sentence has been added to the Reasoned Justification of Strategic Policy S2 to for developments to accord with latest technical guidance, or as updated and amended, including The Environment Agency's Approach to Groundwater Protection; The CIRIA C753 SUDS Manual; and Sustainable Drainage Systems: Non-Statutory Technical Standards – adding to DM18 would be duplication.
Policy already results in an improvement on a current situation. The Council requires site specific FRAs to provide surface water flows that mimic the greenfield runoff rate which is an improvement on the present situation as it will require water to be held on site for longer and perhaps permanently. This has

been a long-standing technical requirement which can already be found in ECC's Sustainable Drainage Design Guide and the EDG – no further changes considered necessary.
Policy DM25 addresses measures to reduce non-potable water consumption, and the use of recovered water for tasks such as flushing toilets. No change required to DM18.
Amendments have been made to Policies S2, DM24 and DM25 to require to the use of integrated water management techniques. No change to DM18 as this is specific to flooding and the measures to address this.
No change in relation to safeguarding land from development that is required, or likely to be required, for current or future flood management. At this stage, we do not have a list of sites where we can identify land to be safeguarded for flood risk management interventions.
The policy supports open space and attenuation measures in flood zones.

Policy DM19 – Renewable and Low Carbon Energy

Summary of Representations – main issues and suggested changes:

- Support expressed (Chelmsford & Central Essex RSPB Local Group, Wates Developments and Hammonds Estates LLP, CNG Fuels)
- Policy should encourage biodiversity, not just impact on it, for example by the establishment of hedgerows and buffer strips (Chelmsford & Central Essex RSPB Local Group, Essex County Council)
- Para 8.163 should refer to the EDG – Solar Farm Guiding Principles (Essex County Council)
- Make the policy and supporting paragraphs more explicit at acknowledging evolving technological carbon reduction advances such as BIO-CNG fuel for the transport sector (CNG Fuels).

CCC response to the comments made
The promotion of biodiversity is addressed in the Solar Farm SPD.
The policy scope is considered appropriate and compliant with national policy.

Delivering and protecting Community Facilities

Key statistics:

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
DM20 – Delivering Community Facilities	3	1	6	6
DM21- Protecting Community Facilities	3	2	5	5
DM22 – Education Establishments	1	1	2	2

DM20 – Delivering Community Facilities

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP, Dandara, Sport England)
- There should be sufficient provision of cemetery space (Environment Agency)
- Refer in policy to vehicle parking being standards in accordance with Policy DM27 (Essex County Council)
- The policy of protecting the Green Belt is leading to other social and economic issues within some Green Belt settlements such as a decline in community infrastructure (Barratt David Wilson (Eastern Counties)).

CCC response to the comments made
It is not considered necessary to cross reference to Policy DM27 – this would also add duplication to the plan.
Development growth in the Green Belt has been discounted as there is sufficient and suitable land is available outside the Green Belt to meet the development needs in a sustainable way. It would also undermine national planning policy.

DM21 – Protecting Community Facilities

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP, Sport England)
- Support the need for applicants to provide evidence for the change of use of a public house, particularly focusing on the pub's economic viability and importance to the local community (Chelmsford & Mid Essex CAMRA)
- Support policy premise amend to make it more effective and robust in relation to the use of the term 'economically viable' as viability can be manipulated through intentionally undermining performance. A facility could be successful under an alternative operating model such as community ownership (Theatres Trust)
- Support for the provision of sufficient, quality community facilities but the policy is not flexible enough. The disposal of no longer suitable or redundant healthcare sites and properties helps to fund new or improved services. Having to meet criterion (ii) adds unjustified delay to vital reinvestment in facilities and services for the community (NHS Property Services Ltd)
- The Spatial Principles do not consider the need for sustainable new housing in Green Belt settlements to sustain their vitality and support existing community infrastructure and services (Barratt David Wilson (Eastern Counties)).

CCC response to the comments made
It is not reasonable to remove requirement Aii), proposals would still need to demonstrate these tests.
It is not necessary to add additional wording in relation to an alternative operating model.

DM22 – Education Establishments

Summary of Representations – Main Issues:

- Support as drafted (Wates Developments and Hammonds Estates LLP)
- Support principle of policy but delete requirement for expansion proposals to be considered against an approved masterplan as education priorities date quickly requiring frequent costly masterplan updates. Instead assess development proposals against prevailing plan policies (ARU).

CCC response to the comments made
Proposals for expansions would still be required to be considered against a masterplan (particularly for ARU) as it is located within a SPA where development would otherwise be constrained – no change.

Making High Quality Places

This section of the consultation document provides the basis for the promotion of Chelmsford as a high-quality place to live, work, visit and study in.

Section 9 - Making Places

Key statistics:

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
Policy DM23 – High Quality and Inclusive Design	4	1	10	10
Policy DM24 – Design and Place Shaping Principles in Major Developments	6	1	9	9
Policy DM25 – Sustainable Buildings	9	2	19	19
Policy DM31 – Net Zero Carbon Development (In Operation)	8	7	29	29
Policy DM26 – Design Specification for Dwellings	3	0	3	3
Policy DM27 – Parking Standards	1	0	1	1
Policy DM28 – Tall Buildings	2	0	4	4

Policy DM23 – High Quality and Inclusive Design

Summary of Representations – main issues and suggested changes:

- Overall support (Wates Developments and Hammonds Estates LLP, Hill Residential Ltd, Dominus Chelmsford Limited)
- Policies DM23 and DM24 appear to overlap especially in respect of major developments (Dandara)

- Expand policy to take a comprehensive and co-ordinated approach to development including respecting site constraints and utilities situated within sites (National Grid Electricity Transmission, National Grid Gas Transmission)
- A number of further design criteria are suggested to minimise fire risk and spread of fire, ensure safe access, and reduce risks to water sources (Essex County Fire and Rescue Service)
- Design should be flexible and not be over prescriptive and limiting, to account for changes in building techniques, market expectations, viability and best practice (Higgins Group)
- The cross reference to Policy DM25 is not necessary (Vistry Group)
- Clarify the supporting text to avoid contradiction with main part of policy (CNG Fuels Limited).

CCC response to the comments made
Site constraints and facilities are considered to be covered by Part A) of the Policy and specific site policies, so no change is required.
Design criteria is relation to fire safety are covered by Building Regulations, so it is not necessary to repeat them in the Policy.

Policy DM24 – Design and Place Shaping Principles in Major Developments:

Summary of Representations – main issues and suggested changes:

- Overall support for the policy (Wates Developments and Hammonds Estates LLP, Dominus Chelmsford Limited, Chelmsford & Central Essex RSPB Local Group); and in particular the reference to Sport England's Active Design Guidance (Sport England)
- Residential institutions (Class C2) should also be subject to Health Impact Assessment and to seek Livewell Accreditation (Essex County Council)
- Swift bricks should be required in accordance with best practice (Swifts Local Network: Swifts & Planning Group)
- Design codes would not be sufficiently flexible to respond to specific circumstances (CNG Fuels)
- Further definition of the circumstances where design codes would be expected would help to clarify whether both a design code and a masterplan would be required (CJH Farming, Pigeon (Sandon) Ltd).

CCC response to the comments made
Bullet 6 amended to include utilising integrated water management techniques.
A range of biodiversity features that can be considered is included in the Reasoned Justification and in the Council's making Places SPD. Inclusion of a specific policy requirement to provide swift bricks is not supported.
References in the Policy to Masterplans are considered to be clear and provide sufficient scope.

Policy DM25 – Sustainable Buildings

Summary of Representations – main issues and suggested changes:

- Overall support for the policy (Wates Developments and Hammonds Estates LLP, Chelmsford & Central Essex RSPB Local Group, CJH Farming, Pigeon (Sandon) Limited, Dominus Chelmsford Limited)
- Support the principle for a water efficiency target, but recommend a more ambitious standard of 80-100 litre/person/day (Essex County Council); 100 litre/person/day as a minimum using a fittings based approach (Anglian Water Services)
- Support for rainwater harvesting (Essex County Council, Anglian Water Services)
- SuDS can be utilised to minimise overall water use (Anglian Water Services)
- Support for development having regard to the Essex Parking Guidance, and the Electric vehicle Charge Point Strategy (Essex County Council)
- Swift bricks should be required in accordance with best practice (Swifts Local Network: Swifts & Planning Group)
- Concern at the introduction of requirements in S2, DM31 and DM25 that go beyond Building Regulations, which may impact viability and deliverability of residential development (Hopkins Homes Ltd, Dandara, Whirledge and Nott, Croudace Homes) and become out of date as standards evolve (Boyer Planning)
- Provision for electric vehicle charging is covered by Building Regulations so should not be duplicated (Hopkins Homes Ltd, Home Builders Federation, Dandara); or the policy should set out where requirements go beyond Building Regulations (Chelmsford Garden Community Consortium, Vistry Group)
- Include a threshold for provision of public EV charging points, which may not be a reasonable requirement on smaller sites (Whirledge and Nott, Croudace Homes)
- Water efficiency targets are covered by Building Regulations, and the policy does not allow for flexibility and therefore is likely to become out of date quickly (Dandara, Hill Residential Ltd)
- Policy should recommend rather than require rainwater harvesting and be limited to garden irrigation (Chelmsford Garden Community Consortium, Vistry Group)
- The threshold for BREEAM assessment should be raised to 1,000sqm, less is unlikely to lead to enhanced sustainable design (Chelmsford Garden Community Consortium, Vistry Group).

CCC response to the comments made
Policy amended to require a water efficiency standard of 90 litres/person/day; and for non-residential buildings above a threshold to meet a national water consumption measure.
Policy amended to include utilising integrated water management techniques.
EV charging point infrastructure requirements have been updated to reflect ECC's Parking Standards update; therefore the reference to the EV parking standards set out in the Policy is considered appropriate.
A range of biodiversity features that can be considered is included in the Reasoned Justification and in the Council's making Places SPD. Inclusion of a specific policy requirement to provide swift bricks is not supported.

Policy DM31 – Net Zero Carbon Development (In Operation)

Summary of Representations – main issues and suggested changes:

- Fully support the policy (Wates Developments and Hammonds Estates LLP, Dominus Chelmsford Limited, Obsidian Strategic Asset Management Ltd, Essex County Council)
- Supportive of the need to support net zero carbon development and the principles of what the policy in seeking to achieve (ARU, Chelmsford & Central Essex RSPB Local Group, Dandara, Vistry Group, Chelmsford Garden Community Consortium)
- Striving to achieve net-zero carbon homes at a faster rate than the Council's and the UK Government's target of net zero carbon emissions is commendable (McCarthy Stone, Gleeson Land)
- Support the principle of energy efficient and sustainable buildings but this should be in line with Building Regulations (Richborough, Home Builders Federation)
- Going beyond Building Regulations goes against the written Ministerial Statements, the NPPF and Planning Policy Guidance (McCarthy Stone, Croudace Homes, Whirledge & Nott, Home Builders Federation)
- Any over provision of Building Regulations should be advisory or supportive, rather than a policy requirement (Richborough)
- The impact of this policy on the viability and deliverability of residential development has not been considered in the plan, its evidence base, or by the IIA (Hopkins Homes Ltd, Home Builders Federation)
- The policy should be amended to provide flexibility with regard to achieving Net Zero Carbon depending on viability (Gleeson Land, Dandara, Croudace Homes, Whirledge & Nott, Higgins Group)
- Exceeding national requirements and setting local standards provide inconsistency across the country, hampering investment and has the potential to impact upon viability and the delivery of housing in the area (Richborough, Vistry Group, Chelmsford Garden Community Consortium, Gladman, Higgins Group, Hill Residential Ltd)
- For the policy to be flexible and justified over the plan period, the requirements need to better reflect the Building Regulations requirements and allow applicants to take a combined approach subject to each individual site (Hill Residential Ltd)
- The implications of such a policy have not been properly assessed in the supporting evidence base (Home Builders Federation)
- The Local Plan Viability Study should be updated to reflect the costs identified in Report 1 of the Essex Net Zero Policy Study – Technical Evidence (Essex County Council)
- The size threshold for requirements 1-5 to apply is too low (ARU)
- Requirement 2: Future Homes Standard will ensure all new homes to be zero carbon ready so it is unnecessary to include this as it will already be addressed through building regulations by the time the local plan review is adopted (Home Builders Federation)

- Supports the policy and the securing of financial contributions where on-site carbon mitigation requirements cannot be met. NHS property could benefit from carbon offset funds (NHS Property Services Ltd)
- Requirement 4: On-site renewable energy generation needs to be applied flexibly. The level of energy use from unregulated sources is beyond the control of the developer and as such it is unreasonable to require the developer to make a payment in order to offset use from these sources (Pigeon (Sandon) Ltd, Higgins Group, Hill Residential Ltd, Home Builders Federation)
- The use of solar PV is a key contributor to achieving Net Zero, but other technologies and approaches may be more suitable for various developments and there needs to be flexibility to deliver what is necessary for the site (Hill Residential Ltd, ARU)
- Requirement 5: Monitoring development for the first five years is beyond the scope of what local planning authorities can require of a developer. Energy use will depend significantly on the occupant and how they use it (Home Builders Federation)
- Suggest amendments to Table 7 to improve clarity, which will be reflected in a revised Essex 'model policy' document to support the policy (Essex County Council)
- Applying this policy retrospectively to allocations within the adopted Local Plan would impact their viability and deliverability (Hopkins Homes Ltd)
- Relying solely on renewable fuel provided on sites is too greater risk. A "safety net" of mains electricity from the grid should be available in case the installation, designs or calculations fall short of expectations (Chelmsford & Central Essex RSPB Local Group)
- Other local authorities are mentioning the use of sustainable building materials (such as the use of home grown timber) in their new local plans (Forestry Commission England)
- Consider developing the points raised on overheating in the Reasoned Justification into a specific plan policy to give greater weight to mitigating overheating risk in new development proposals (Essex County Council)
- The new Essex evidence-led 'model policy' to address embodied carbon emissions from new development, and its supporting evidence base, should be included as an additional policy (Essex County Council).

CCC response to the comments made
Local Authorities have statutory powers to set planning policies which require energy efficiency standards that are better than Building Regulations as long as these are evidenced and justified, and policies can be expressed using energy metrics if they are supported by an evidence base that justifies their viability. The legal justification is set out in the Essex Open Legal Advice - Energy Policy and Building Regulations (February 2024), which should be read alongside the TCPA resource page (16th July 2024) which addresses the latest situation regarding the Written Ministerial Statement (WMS) 13th December 2023, including a guest blog by Estelle Dehon KC which highlights important clarifications on the WMS 2023

confirmed through published correspondence directly with the former Secretary of State for Levelling Up, Housing and Communities. No changes required.
The Building Regulations set minimum standards that must be achieved for energy performance in new homes and buildings. These are a 'floor' and not a 'ceiling'. Planning policy is necessary to address the shortcomings within the Building Regulations 2021 and the proposed Future Homes Standard 2025, which do not adequately address operational carbon emissions from new development as they only cover a proportion of energy use of a building, namely regulated energy use and they rely on grid decarbonisation to achieve 'net zero'. Regulated energy use only makes up about half of the energy used in a building. The other half is known as 'unregulated' energy and this is not covered by Building Regulations at all. Policy DM31 covers both types and so ensures that carbon emissions from a buildings total energy use are addressed and hence delivers truly net zero carbon buildings in operation. No changes required.
It is widely acknowledged by industry that the 'Standard Assessment Procedure' (SAP) software is not an accurate software for predicting the energy performance of a building. It was never intended to be, it is a compliance software only. The former Government recognised this issue and began consulting upon the introduction of new software to replace SAP – known as the Home Energy Model. However, this has not progressed further yet. It is therefore reasonable to require major developments to use existing and well-established reliable and accurate predictive energy modelling software to demonstrate policy compliance. Minor developments may follow the 'minimum fabric specifications approach' as set out in the Reasoned Justification to provide some flexibility to smaller developers who may not wish to invest in predictive energy modelling software. In addition, as part of the wider Essex Authorities work on supporting the implementation of the net zero policy, a 'SAP conversion tool' which can be used on smaller developments to demonstrate policy compliance using SAP outputs has been created. Reference to this has been added to the Reasoned Justification.
Essex wide viability reports support the policy requirements and have fed into CCC Local Plan Viability testing and are shown to be viable. No changes required.
CCC Local Plan Viability testing has been updated to reflect the costs identified in Report 1 of the Essex Net Zero Policy Study – Technical Evidence (July 2023).
The policy applies to 1 dwelling and above, and this is supported by the Essex evidence base. The policy does seek to limit the potential burden of reporting requirements for minor developments (under 10 dwellings) by offering a 'minimum standards approach' to be followed as an alternative to submitting an energy strategy which includes the use of predictive energy modelling. No changes required.
The Future Homes Standard is not in place yet, it has only been consulted upon and the new Government has not yet responded. There is no guarantee it will be in place in a certain timescale. Therefore, to ensure all new homes and buildings are fossil fuel free in Chelmsford, the method that is under direct control of the local authority is the Local Plan and Policy DM31. No changes required.
Solar PV was selected to be modelled in the evidence base to demonstrate net zero because it is the cheapest, and most mature and commonly available renewable energy technology that is suitable for buildings to incorporate. Consideration has been given to the request to replace solar PV with renewable energy generation. However, as the Evidence is based on solar PV as this is the cheapest, most mature, commonly available and cost effective technology

reference to ‘rooftop’ before solar PV has been added to this policy requirement to make this clear, and is what the evidence justifies the policy requiring.
The Essex Net Zero Policy Study (July 2023) demonstrates that it is technically feasible at reasonable cost to accommodate sufficient rooftop solar PV on new homes to match the predicted annual average energy demand from the building. The Policy includes an energy offsetting clause that can be triggered in circumstances where it is not practically feasible to achieve this. The developable area of a site will not be reduced as a result of the Requirement 4 because evidence shows the requirement can be met through rooftop solar PV. The requirement is based on the buildings total energy use – and that includes both regulated and unregulated energy uses - because that is the true impact of the development proposal and can be reliably predicted at design stage through energy modelling.
Development sites will still be connected to the mains electricity grid as normal to ensure consistency in energy supply and meet the fluctuations in energy demand. The renewable energy generation on-site will also be connected to the electricity grid. It is just that roof top solar PV on buildings will be used by those occupiers in the first instance and any excess then is exported to the grid which benefits the decarbonisation of the grid too. Vice versa happens when not enough electricity is generated by the roof top solar PV to meet the energy needs of the occupiers, for example, in winter. No changes required.
The requirement for in-use monitoring applies to large scale developments of 100 dwellings or more and only requires energy information to be collated from a sample of dwellings equating to 10%. This is 10 homes on a 100 home scheme. It is considered a reasonable sample to require in order for a developer to benefit from a meaningful set of results which can then be used to aid continuous learning and improvement on the delivery of net zero homes. The Policy is flexible in how this information is to be collected, the developer can consider the most appropriate method for them and put forward a monitoring strategy at the appropriate time in the planning process. No changes required.
The energy offsetting mechanism enables flexibility in the policy to accommodate those developments where it is not technically feasible to achieve an on-site energy balance to still achieve ‘net zero’. This is a well established approach. No changes required.
The table relating to ‘Minimum Standards Approach Fabric Specifications (Domestic)’ has seen minor amendments to improve clarity, which is a reflection of changes to the revised Essex ‘model policy’.
Matters of overheating have been included into Policy S2 to give greater weight to mitigating overheating risk in new development proposals.
The new Essex evidence-led ‘model policy’ to address embodied carbon emissions from new development, and its supporting evidence base, was not available at an appropriate time to test and include as an additional policy in the Pre-Submission Local Plan. No changes required.
The policy supports delivery of the Council’s declared climate and ecological emergency in 2019 and proposed work towards reaching net zero by 2030.

Policy DM26 – Design Specification for Dwellings

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP)

- Swift bricks should be required in accordance with best practice (Swifts Local Network: Swifts & Planning Group)
- Support expressed for the overall policy objective, but further clarification on the Council's open space requirements and private amenity spaces would be helpful in this policy wording (Vistry Group).

CCC response to the comments made
A range of biodiversity features that can be considered is included in the Reasoned Justification and in the Council's making Places SPD. Inclusion of a specific policy requirement to provide swift bricks is not supported.

Policy DM27 – Parking Standards

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP).

CCC response to the comments made
No changes. However, policy changes have been made to reflect the latest ECC Parking Guidance.

Policy DM28 – Tall Buildings

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP, Historic England)
- More clarification is needed on how a site is assessed for its suitability for higher intensity development (Highgate Capital Limited)
- Add additional wording to include other locations that are well served by public transport (Vistry Group).

CCC response to the comments made
Suitability for higher intensity development is covered in the Reasoned Justification.
Proposals outside the City Centre will be considered on their merits, where a view on the suitability of other locations can be taken.

Protecting Living and Working Environments

Key statistics:

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
Policy DM29 – Protecting Living and Working Environments	1		1	1
Policy DM30 – Contamination and Pollution	2		3	3

Policy DM29 – Protecting Living and Working Environments

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP).

CCC response to the comments made
No changes. However, policy changes have been made for clarification.

Policy DM30 – Contamination and Pollution

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP, Chelmsford & Central Essex RSPB Local Group)
- Re-development of land affected by contamination is encouraged as it is a sustainable approach (Environment Agency).

CCC response to the comments made
Reasoned Justification amended to ensure developments accord with the latest technical guidance with regards to land contamination.

Monitoring Framework

This section of the consultation document deals with how the Council will monitor the Local Plan's success in meeting the challenges and opportunities set out in the Strategic Priorities to ensure that it is effective in delivering the objectives of the Local Plan.

Key statistics:

Consultation point	**Yes**	**No**	**Comments**	**Total number of responses**
Table 8	0	0	1	1

Summary of Representations – main issues and suggested changes:

- S14 Page 326 - Amend `Key Trigger' to read: 'Number of Health Impact Assessments on development for 50 or more dwelling, C2 (Residential Institutions) and non-residential development in excess of 1,000 m2' and `Trigger for Action' to read: '(1) Health Impact Assessment is not submitted on one or more development for 50 or more dwellings, one or more C2 (Residential Institutions) and one or more non-residential development in excess of 1000 m2' (Essex County Council)
- S14 Page 326 - Consider if reference should be made to `initial assessments' (Essex County Council)
- S14 Page 326 - Provide further clarification on the process and details for `an initial assessment' for developments for example, desktop, rapid and full/comprehensive (Essex County Council)

- S14 Page 326 - Consider an additional indicator that captures how HIA's are effectively and positively influencing proposals and achieving what they are set out to do (Essex County Council).

CCC response to the comments made
Not necessary to add Use Class after C2 and to do so would be inconsistent with the rest of the Local Plan.
Suggestions relating to types of HIA assessment are addressed in changes set out under Strategic Policy S14.
No change to include the proposed additional HIA indicators as it is unclear how this would be monitored.

Draft Policies Map

This section of the consultation document sets out the Draft Policies Map which illustrate sites for development or protection within the Local Plan.

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Draft Policies Map (Paragraphs 11.1-11.3)	1	4	5	5
Map 3 – Chelmsford Urban Area	1	4	5	5
Map 5 – South Woodham Ferrers	0	0	1	1
Map 8 - Bicknacre	0	2	2	2
Map 11 – Chatham Green	0	1	1	1
Map 12 - Danbury	0	1	1	1
Map 16 - Galleywood	0	0	1	1
Map 23 – Little Waltham	0	1	1	1
Rural Employment Areas				
None	0	0	0	0
Other Maps				
None	0	0	0	0
Legend	0	0	0	0

Chelmsford Urban Area (Map 3)

Summary of Representations – main issues and suggested changes:

- Revise Chelmsford Urban Area to include areas of development and land east and south of the A12 (along Main Road and Paynes Lane, Boreham) (Aquilia Developments, CNG Fuels)
- Revise to allocate Chantry Farm, Waltham Road, Boreham for Specialist Housing for the elderly (Mark Jackson Planning)
- SGS16a (Hammonds Farm) - Exclude land north of the River Chelmer from the Country Park and site boundary and retain in agricultural use, add the

indicative route for the access route to Junction 19, and reduce the eastern development boundary to exclude land in Flood Zones 2 and 3 adjacent to Sandon Brook (Wates Developments and Hammonds Estates LLP)
- Allocate land at north west Chelmsford, north of the existing settlement boundary (Dandara Eastern)
- Allocate land north of Runsell Lane to help meet local housing needs whilst minimising harm and protecting the purposes of the Green Belt (Obsidian Strategic)
- Expand Widford Industrial Estate to the west to support Saxtons 4x4 and to better align with the Spatial Strategy (Saxtons 4x4)
- Expand Growth Site 15 to include further land to the west to reflect the full extent of the deliverable site (CLH Farming Ltd).

South Woodham Ferrers (Map 5)

Summary of Representations – main issues and suggested changes:

- A dual carriageway on the A132 and a northern bypass on the B1012 are required rather than 'Route Capacity Improvements'.

Bicknacre (Map 8)

Summary of Representations – main issues and suggested changes:

- Revise settlement boundary to include the entire Priory Pet & Country Supplies Store site, Horseshoe Farm to reflect recent planning history (Strutt & Parker)
- Allocate land north of Roxwell Road as an extension to Location 2 – West Chelmsford which performs better when compared against Hammonds Farm (Taylor Wimpey)
- Object to allocation of a new Garden Community at Hammonds Farm which is not deliverable by 2041 or justified by the evidence base Farm (Taylor Wimpey)
- Unclear why the Defined Settlement Boundary cuts through gardens.

Chatham Green (Map 11)

Summary of Representations – main issues and suggested changes:

- Increase the settlement boundary to make it more sustainable by including Pondside Nursery and Yard and allocating it for employment or residential development (Mr and Mrs Andrew Parker).

Danbury (Map 12)

Summary of Representations – main issues and suggested changes:

- Allocate land north of Runsell Lane to help meet local housing needs whilst minimising harm and protecting the purposes of the Green Belt (Obsidian Strategic).

Galleywood (Map 16)

Summary of Representations – main issues and suggested changes:

- The defined settlement boundary has been drawn to exclude any worthwhile housing sites apart from site 4. The plan should be more flexible to allow the growth of Galleywood (Park View Group).

Little Waltham (Map 23)

Summary of Representations – main issues and suggested changes:

- Remove Green Wedge notation from land between 148 The Street and The Warren, Braintree Road and allocate for housing (Mr Paul Hopkins).

No comments to other maps.

CCC response to the comments made
The site boundaries have been reviewed ahead of publishing the Pre-Submission Draft Policies Map. Boundaries are supported by the plan evidence base including the Landscape Sensitivity and Capacity Study and Employment land Review 2023.
Boundary changes have been made for site policy 16a (Hammonds Farm) including change to the eastern boundary to remove flood zones 2 & 3, removal of section of the northern parcel and revised Country Park boundary and inclusion of areas for future recreation use for SuDS and or biodiversity – see more information under the site policy.
Further expansion at West Chelmsford (Location 2) and Broomfield (Location 8) have been considered and tested but rejected due to their impact on and the capacity of the local road network and their relative remoteness from the strategic road network. Unbuilt allocated sites rolled forward from the adopted Local Plan are considered to represent sustainable and sound development allocations which have been previously subject to Independent Examination.
There are no proposed changes to the Green Belt. Proposed site allocations are focused at settlements outside the Green Belt, informed by a Settlement Hierarchy to select sustainable locations.
The site boundary for Site 15 Little Boyton Hall Farm is supported by the evidence base including the Landscape Sensitivity and Capacity Study and therefore no changes are proposed.
There is no evidence to suggest that a dual carriageway on the A132 and a northern bypass on the B1012 are required.
The Bicknacre DSB was proposed for extension on the Preferred Options Draft Policies Map to include the building, not the garden in relation to the approved planning application at Priory Pet & Country Supplies Store site, Horseshoe Farm. The garden has not been included in line with criterion 7 of the DSB methodology i.e. exclude land of predominantly open character at the edge of a settlement.
The DSB methodology guidance states that the Urban Area Boundary/DSB will normally be drawn approximately 25m from the rear and side elevations of houses with large gardens (as well as pubs, churches and community halls).
Chatham green is not included within the spatial strategy as an area of growth. Chatham Green has been considered and tested but 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.
Minor adjustments are proposed to Defined Settlement Boundaries as part of the Pre-Submission Local Plan, and these are set out in the Urban Area and Defined Settlement Review Technical notes which forms part of the evidence base. These include changes around the proposed site allocations for new housing and employment. Chelmsford UAB will be extended with the inclusion of Location 16a (Hammonds Farm) and the employment site at Location 16b.
The Green Wedge is a locally important designation. Changes to the Green Wedge boundaries to allow development growth has been discounted as sufficient and suitable land elsewhere to meet development needs in a sustainable way.

Appendices

This section of the consultation document contains four appendices.

Key statistics:

Consultation point	Yes	No	Comments	Total number of responses
Appendix A – Schedule of Superseded Documents and Policies	0	1	1	1
Appendix B – Development Standards	0	0	0	0
Appendix C – Development Trajectories	0	0	2	2
Appendix D – Glossary	1	1	5	5

Appendix A – Schedule of Superseded Documents and Policies

Summary of Representations – main issues and suggested changes:

- One comment received which relates to Policy DM2.

Appendix B – Development Standards:

No comments.

Appendix C – Development Trajectories

Summary of Representations – main issues and suggested changes:

- It seems highly unlikely that housing sites expected to deliver within the next 12 months will do, so the plan needs to allocate more deliverable smaller sites (Opus Little Waltham Developments Ltd)
- There is no evidence that 3,000 new homes at Hammonds Farm will be completed within the plan period, with a potential further 1,000 homes beyond 2041. Although large sites can deliver more homes per year over a longer time, they also have longer lead-in times. To secure short-term immediate boosts in supply – a good mix of smaller sites is necessary (Taylor Wimpey).

Appendix D – Glossary

Summary of Representations – main issues and suggested changes:

- Add the following heritage related terms: listed buildings, conservation areas, scheduled monuments, registered parks and gardens and designated and non-designated heritage assets (Historic England)
- Add ‘constituted community organisation’ referred to in para. 1.43 (Essex County Council)
- Add terms related to specific cohorts for supported and specialist housing and accommodation such as older people and people with a learning disability (Essex County Council)
- Add a definition for Renewable and Low Carbon Energy (CNG Fuels Ltd)
- Add detail relating specifically to police, ambulance and fire and rescue facilities (Essex Police).

CCC response to the comments made
The Housing Trajectory and timings within it are established through the Council’s Five Year Housing Land Supply Methodology (April 2024). The Trajectory is updated annually, and the Pre-Submission Local Plan uses the latest available Housing Site Schedule (April 2024).
The heritage related terms proposed to be included were already in the Glossary but some have been updated or tweaked for clarity and consistency.
A definition has been added for ‘renewable and low carbon energy’ for completeness.
The definition of ‘infrastructure’ has been updated for clarity and completeness
It is not considered necessary to include the remaining terms suggested.

List of Appendices

Appendix 1: Organisations consulted and copies of key consultation materials

Appendix 2 - Essex Highways responses to highway and transportation representations (Preferred Spatial Approach - Response to Representations (December 2024)

Appendix 3 - Letter from Natural England regarding designating Areas of Outstanding Natural Beauty (December 2023)

Appendix 4 - Letter from Welbeck land regarding access to Barbrook Way (Site allocation 11c)

APPENDIX 1

List of organisations consulted

Consultation Statement

Exhibition Panels

Pop-Up Stand

Pop-Up Stand on Site

Local Plan Video

Local Plan Virtual Exhibition

Essex Chronicle Advert

City Life Articles

South Woodham Focus Article

Local Plan Poster

Examples of Social Media Posts

GovDelivery Mailshot

Example Site Notices

Staff Email Banner

Bus Stop Adverts

Local Plan Newsletter

List of organisations consulted

The Council notified more than 2,800 contacts registered on its Consultation Portal.

This included the specific and general contacts listed below, and members of the public who are not listed.

1st Chelmsford Scouts

A Dunn & Son

A.R. Property Designs Ltd.

Abbess, Beauchamp & Berners Roding Parish Council

Abellio Greater Anglia

Accord Energy Limited

Active Workspace Ltd

Age UK Essex

Agency of Architecture

Aggregate Industries UK Ltd

AGS Cemetery and Crematoria Services

Aldi Stores Ltd

Alun Design Consultancy

Anchor Housing

Andrew Martin - Planning Ltd

Angel Stores

Anglia Ruskin University

Anglian Water Services Ltd

Aquila Developments

Arcady Architects

Archerfield Homes

Arriva The Shires and Essex

ASP

Atkins Telecom

Avison Young

Aviva

b3 Architects LLP

Baddow Hall Junior School

Bakers Lane Action Group

Barking & Dagenham CCG

Barnes Farm Infant School

Barnston Parish Council

Barratt David Wilson

Barratt Eastern Counties

Barton Willmore

Basildon & Brentwood CCG

Basildon Borough Council

Baya Homes

BBC Essex

BDP

Beaulieu Residents

Belport Limited

Bennetts BMW Specialists

Berkeley Strategic

Bidwells

Billericay Town Council

Bishops Primary School

Black Notley Parish Council

Blackmore, Hook End & Wyatts Green Parish Council

Bloor Homes (Eastern)

BNP Paribas Real Estate UK

Boreham Conservation Society

Boreham Parish Council

Boreham Primary School

Bowler Energy LLP

Boyer Planning

Bradwell Power Generation Company Ltd

Braintree District Council

Brentwood and Chelmsford Green Party

Brentwood Borough Council

Bressole Limited

Bridgewater Property Group Limited

Broadfield Homes Ltd

Broomfield Neighbourhood Plan Steering Group

Broomfield Parish Council

Broomfield Parish Council, Chignal Parish Council, Great Waltham Parish Council, Little Waltham Parish Council, Writtle Parish Council and Newlands Spring Residents Association

Broomfield Primary School

BT National Notice Handling Centre

BT Openreach, Southend ATE

Building Research Establishment

CAAG

Campaign For Real Ale (CAMRA) Limited

Campaign to Protect Rural Essex

CAODS (Chelmsford Amateur Operatic & Dramatic Society)

Capital Property & Construction Consultants Ltd

Carter Jonas

Castle Point & Rochford CCG

Castle Point Council

Catton Homes

CBRE

Cemex UK Properties Ltd

Centrica Barry/ Generation/ KL/ PB/ RPS LTD

CERA (Chignal Estate Residents Association)

Chancellor Park Primary School

Channels Residents Community Group

Charterhouse Property Group & Charterhouse Strategic Land

Chartplan (2004) Limited

Chelmer & Blackwater Navigation Co Ltd

Chelmer Canal Trust

Chelmer Cycling Club

Chelmer Housing Partnership

Chelmer Residents Forum

Chelmer Valley High School

Chelmer Valley Landscape Group

Chelmer Village Parish Council

Chelmsford & Central Essex RSPB Local Group

Chelmsford and District Model Railway Club

Chelmsford Biodiversity Forum

Chelmsford Business Board

Chelmsford Canoe Club

Chelmsford City Centre Retailers Group

Chelmsford City Council

Chelmsford City Football Club

Chelmsford Civic Society

Chelmsford College

Chelmsford Community Transport Limited

Chelmsford Commuters & Rail Travellers

Chelmsford County High Schools for Girls

Chelmsford CVS

Chelmsford Cycle Action Group

Chelmsford Garden Community Council

Chelmsford Hindu Society

Chelmsford Labour Party

Chelmsford Liberal Democrats

Chelmsford Liberal Party

Chelmsford Mencap

Chelmsford NAG

Chelmsford Rugby Football Club

Chelmsford Safety Supplies

Chelmsford Social Club Ltd

Chelmsford Star Co-operative Society Ltd

Chelmsford Taxi Association Limited

Chelmsford Theatre Workshop

CHESS

Chignal Estate Residents Association

Chignal Parish Council

CHP

Chris Marten Architectural Services

Chris Tivey Associates

Christian Care

Christian Growth Centre Chelmsford

Church of Our Lady Immaculate

Churchill Retirement Living

Civil Aviation Authority

Claremont Planning

Clark Partnership

Clarke & Simpson

CODE Development Planners

Colchester City Council

Cold Norton Parish Council

Colliers International

Collingwood Primary School

Colt Technology Services

Columbus School & College

Commercial Estates Group

Company of Proprietors of the Chelmer & Blackwater Navigation Ltd

Confederation of Passenger Transport UK (Hedingham/Chambers)

Connexions & Careers Chelmsford

Cool Heat Services

Corona Energy Retail 4 Ltd

Countryside L&Q (North East Chelmsford) LLP

Countryside Properties (UK) Ltd

CPRE Essex

Craintern Ltd

Crest Nicholson

Crouch Vale Brewery Ltd

Croudace Homes

Crown Energy Ltd

CSJ Planning Consultants Ltd

CT Planning

Cycling UK

Danbury Mission

Danbury Neighbourhood Plan Steering Group

Danbury Parish Council

Danbury Park Community Primary School

Danbury Society

Dandara

Data Energy Management Services Ltd

Defence Infrastructure Organisation (DIO)

Department for Education

Department for Levelling Up, Housing and Communities

Department for Transport (DfT)

Department of Trade and Industry

Derbyshire Gypsy Liaison Group

Design Council

detoxpeople ltd

Development Land & Planning Consultants Ltd

DevPlan UK

DHA Planning

Diageo Pension Trust Fund

Diocese of Chelmsford

DMH Stallard

Dominic Lawson Bespoke Planning Ltd

Dominvs Group

Downham CE (VC) Primary School

DTI

DWD Property & Planning

E & M Design

E.ON UK Plc

E2V Technologies

East Anglia GREEN

East Anglia London Properties Ltd

East Hanningfield Parish Council

East Hanningfield Parish Plan Committee

East Herts District Council

East of England Ambulance Service NHS Trust

East Thames Housing

Eastlight Homes

Ecotricity

EDF Energy

Education & Skills Funding Agency

Edward Gittins Associates

Edward Parsley Associates Ltd

EE

Elim Christian Centre

Elm Green Preparatory School

Elmwood Primary School

Energy Environment and Sustainability Group

English Rural Housing Association

ENI UK Ltd

Enplan

Environment Agency

Epping Forest District Council

ERGOTECHNICS

Esperance energies

Essex & Suffolk Water

Essex ARG

Essex Association of Local Councils

Essex Biodiversity Project

Essex Bridleways Association

Essex Chamber of Commerce

Essex Chronicle

Essex County Council

Essex County Fire and Rescue Service

Essex Fire

Essex Herts Air Ambulance Trust

Essex Local Nature Partnership

Essex Police

Essex Police Fire and Crime Commissioner

Essex Record Office

Essex Respite and Care Association

Essex Squash & Racketball Association

Essex Waterways Ltd

Essex Wildlife Trust

Estuary Design Ltd

Estuary Housing Association

Evolution Town Planning

Exolum Pipeline System Ltd

Eyott Sailing Club

Farleigh Hospice

Felsted Parish Council

Fenn Wright

Fergusons

First Choice Residential Lettings

First Essex Buses

Fisher German LLP

Flagship Housing Group Ltd

Flaternity Residents association

Flitch Green Parish Council

Football Association

Ford End Church of England Primary School

Ford End Village Design Statement Committee

Forestry Commission England

Foster Partnership Farms

Fraser Halls Associates

Friends, Families and Travellers and Traveller Law Reform Project

G.T.C/Utility Grid Installations

Galleywood Infant School

Galleywood Parish Council

GB Partnerships

Gladman Developments Ltd

Gleeson Land

Going Places Leisure Travel Ltd

Good Easter Parish Council

Good Easter Village Hall

Graham Anthony Associates

Grangewood Brentwood Ltd

Great & Little Leighs Parish Council

Great Baddow Beehive Lane County Primary School

Great Baddow High School

Great Baddow High School

Great Baddow Parish Council

Great Baddow St Mary

Great Notley Parish Council

Great Waltham C of E (VC) Primary School

Great Waltham Parish Council

Greater London Authority

Green Planning Studio Ltd

Greenfields Community Housing Ltd

Grosvenor Developments Ltd

H M Prison Service

Hamilton Bentley & Partners

Harlequin Ltd

Harlow District Council

Hastoe Housing Association

Hatfield Peverel Parish Council

Havering CCG

Havering London Borough

Health and Safety Executive

Heart of Essex Local Enterprise Partnership

Heathcote School

Heatons

Help The Aged

Helping Hands Essex

Heritage Writtle

Hertfordshire and West Essex ICB

Hertfordshire County Council

hgh Consulting

Higgins Group

High Easter Parish Council

High Ongar Parish Council

Highways England

Highwood Parish Council

Highwood Primary School

Highwood Village

Hill Residential Ltd

Historic England

HLR Consulting Ltd

Home Builders Federation

Homes England

Hopkins Homes Ltd

House Of Commons

Howard Sharp & Partners LLP

Howe Green Community Association

Hullbridge Parish Council

Hunter Page Planning

Hylands School

Iceland Foods Ltd

Iceni Projects

Ideas Hub

Indigo Planning

Indigo Planning Ltd

Ingatestone & Fryerning Parish Council

Ingatestone Village Design Statement

Ingleton Wood (Billericay)

Intergen

J. Aron & Company

Jacobs UK Limited

James Development Ltd

JB Planning Associates Ltd

JCN Associates Ltd

JCN Design Ltd

JMS Planning & Development Ltd

John H Bayliss & Co

Keeble Brothers

Keeran Designs Ltd

Kemsley LLP

King Edward Grammar School

Kings Hardware Ltd

Kings Road Primary School

Kings Road/North Avenue Community Action Group

KLW Planning

KM Consulting

L&Q

Lambert Smith Hampton

Landscape Planning Group Ltd (including Landscape Planning & OCA)

Langford and Ulting Parish Council

Lanpro

Larkrise Primary School

Larmar Engineering

Latimer Homes

Lawford Mead Primary & Nursery School

Lawns Action Group

Little Baddow Parish Council

Little Baddow Society

Little Dunmow Parish Council

Little Waltham C E V A Primary School

Little Waltham Parish Council

Lodge Coaches

London Borough of Barking and Dagenham

London Borough of Enfield

London Borough of Redbridge

London Borough of Waltham Forest

London Gypsies and Travellers Unit

Longfield Solar Farm

Lower Thames Crossing

LSL Partners

Maldon District Council

Maltese Road Primary School

Mansfield Monk Limited

Marconi Plaza Residents Association

Margaret Roding Parish Council

Margaretting CE (VC) Primary School

Margaretting Parish Council

Marine Management Organisation (MMO) HM Government

Mark Jackson Planning

Marrons Planning

Mashbury Parish Council

Master Designs Essex

McDonald's Restaurants

Meadgate Primary School

Meadows Shopping Centre

Melville Dunbar Associates

Michael Benham Acquisition/Disposal of Land & Property

Mid and South Essex ICS

Mid and South Essex Integrated Care Board (ICB)

Mid Essex Gravel Pits (Chelmsford) Ltd

Mid Essex Hospital Services NHS Trust

Mid Essex Primary Care Trust

Mid-Essex Business Group

Mildmay Infant and Nursery School

MJD Planning

Moat Homes

Mobile Broadband Network Limited

Mono Consultants Ltd

Montagu Evans

Moody Homes Ltd

Moulsham High School

Moulsham Infant School

Moulsham Junior School

Moulsham Mill Partnership

Mountnessing Parish Council

N Clark Welding & Fabrication

Nabbotts County Infants School

Nathaniel Lichfield and Partners

National Gas Transmission

National Grid UK

National Highways

Natural England

Neos Networks

Network Rail

New Hall School

Newlands Spring Primary School Academy Trust

Newlands Spring Residents Association

Nexus Planning

NGB Essex Angling

NGB Essex Athletics

NGB Essex Basketball

NGB Essex Boccia

NGB Essex Bowls

NGB Essex Cricket

NGB Essex Cycling

NGB Essex Fencing

NGB Essex Football

NGB Essex Gymnastics

NGB Essex Hockey

NGB Essex Lacrosse

NGB Essex Movement and Dance

NGB Essex Orienteering

NGB Essex Rowing

NGB Essex Rugby Union

NGB Essex Sailing

NGB Essex Squash

NGB Essex Triathlon

NGB Essex Volleyball

NHS England East

NHS North East London

NHS South East and South West Essex

NHS Suffolk and North East Essex ICB

NIBS Buses

Nigel Chapman Associates

North Central London CCG

North Essex Partnership NHS Foundation Trust

North Fambridge Parish Council

North West Parishes Group

Northern Trust

Oaklands Infants School

Office of Rail Regulation

Our Lady Immaculate R C Primary School

Parkway and Town Centre Neighbourhood Action Panel

Parkwood Academy

Paul Dickinson & Associates

Pegasus Group

Perryfields County Infants School

Perryfields Junior School

Persimmon Homes Essex

Phase 2 Planning & Development

Pinnacle Planning

PKC Retail Ltd

Place Services Historic Environment Team

PlanIt Planning and Development Ltd

Planning Issues Ltd

Planning Potential

Planware Ltd

Plater Claiborne Architecture & Design

Pleshey Parish Council

Pomery Planning Consultants

Premier Homes

Princes Rd Allotment Association

Priory Primary School

PRS

PS Planning & Design

Ptarmigan Group and Chelmsford Land Ltd

Ptarmigan Land Ltd

Purleigh Parish Council

Ramblers Essex Area

Ramsden Bellhouse Parish Council

Ramsden Crays Parish Council

Rapleys

Rawreth Parish Council

Rayleigh Town Council

Raymond Stemp Associates

Rayne Parish Council

RCCE

Redbridge CCG

Rentplus (Agents Tetlow King Planning)

Reprohouse Limited

Resting Places Limited

Retail Focus

Rettendon Common Residents Association

Rettendon Parish Council

Rettendon Primary School

Rettendon Site Leaseholders Association

River Crouch Conservation Trust

Road Haulage Association

Robert Brett & Sons Ltd

Robinson and Hall

Rochford District Council

Roxwell CoE (VC) Primary School

Roxwell Parish Council

Royal Mail Group

Royal Society For Protection of Birds

RPS Planning & Development Ltd

RSPCA

Rubicon West Plc

Rugby Football Union

Rugbytots Central Essex

Runwell Parish Council

Rural Community Council of Essex

Rural Solutions Ltd

Ruston Planning Limited

S A Mynard Limited

Sandon Parish Council

Sandon school

Save Sandford Mill Campaign

Savills (UK) Limited

Scott Brownrigg

Scottish & Southern Energy Pipelines

Sellwood Planning

Shirley Smith & Co

Shotgate Parish Council

Sky Telecommunication Services Ltd

Smart Planning

Smiths Environmental Products Ltd

South East LEP

South Hanningfield Parish Council

South Molton Real Estate Ltd

South Woodham Action Group

South Woodham Ferrers Health & Social Care Group

South Woodham Ferrers Town Council

Southend Borough Council

Southend CCG

Southern Electric

SP PowerSystems

SPD Studio

Sphere 25

Sport England

Springboard Housing Association ltd

Springfield Parish Council

Springfield Primary School

Springfields Planning & Development Limited

SSE Pipelines Ltd

St Anne's Preparatory School

St Augustine's Catholic Church

St Cedd's School

St John Payne Catholic School

St John's C of E Primary School

St Joseph's Catholic Primary School

St Mary's CE Primary School

St Mary's Church Great Baddow

St Peters Primary School

St Pius X Catholic Primary School

St. Michael's Junior School

Stephenson's of Essex Ltd

Stevens VW Dismantlers

Stock CE Primary School

Stock Parish Council

Stonebond Properties Ltd

Stow Maries Parish Council

Strutt & Parker LLP

Swan Housing Association

Sworders

Tarmac

Telecom Plus PLC

Tendring District Council

Terence O'Rourke Ltd

Terling and Fairstead Parish Council

Tetlow King Planning

The Alternative Accommodation Agency Ltd

The Beaulieu Park School

The Boswells School

The Cathedral School Chelmsford

The Chelmsford Ballet Company

The Chelmsford Labour Party

The Chelmsford Society

The Downes Planning Partnership

The Essex Badger Protection Group

The Inland Waterways Association (Chelmsford Branch)

The John Bishop Partnership

The JTS Partnership LLP

The Land Trust

The Landscape Conservation Trust

The National Federation of Gypsy Liaison Groups

The National Trust

The Newspaper Society

The Owen Partnership

The Planning Bureau

The Royal Horticultural Society

The Sandon School

The Showmen's Guild of Great Britain

The Showmen's Guild of Great Britain London and Home Counties

The Tyrells Primary School

The Wilderness Foundation UK

The Women's National Commission

Theatres Trust

Third Dimension Group Ltd

Thomas Dixon Developments Ltd

Three

Thriftwood School

Thurrock Borough Council

Timpsons

TMA Chartered Surveyors

Tolhurst Fisher LLP Solicitors

Total Gas and Power Ltd

Transition Chelmsford

Transport East

Transport for London

Traveller Law Reform Project

Travelling Showman's Guild

Tree Fella Plc

Trinity PPP Limited

Trinity Road Primary School

Trinity St Mary's CE (VA) Primary School

Tritton Family Trust

Turley Associates

UK Power Networks

Uttlesford District Council

Valco UK Ltd

Village Hall Committee

Virgin Media Services

Vitol Gas Ltd

Vodafone and O2

W&H Marriage & Sons Ltd

Waitrose Ltd

Wardrop & Co Ltd

Warwick Court Property Company

Waterhouse Farm Residents Association

Wates Developments Limited

WEA Sec

Welbeck Strategic Land

Welsted Joinery Ltd

West Hanningfield Parish Council

West Register (Realisations) Ltd

Westlands Community Primary School

WH Marriage & Sons Ltd

Whirledge and Nott

Wickford Town Council

Widford Lodge Preparatory School

William de Ferrers School

Willingale Parish Council

Wilson Construction Ltd

WM Morrison Supermarket Plc

Women's Institute

Woodham Ferrers & Bicknacre Parish Council

Woodham Mortimer with Hazeleigh Parish Council

Woodham Walter Parish Council

Woodland Trust

Woodville Primary School

Woolf Bond Planning

Writtle Infant School

Writtle Junior School

Writtle Neighbourhood Plan Group

Writtle Parish Council

Writtle Surgery

Writtle VDS

YMCA

CONSULTATION STATEMENT
May 2024

REVIEW OF CHELMSFORD LOCAL PLAN

REGULATION 18 – PREFERRED OPTIONS

Chelmsford City Council has published its Regulation 18 Preferred Options consultation on the Review of its adopted Local Plan. This consultation is accompanied by a Preferred Options Integrated Impact Assessment.

The consultation runs for six weeks from **10am on Wednesday 8 June 2024 until 4pm on Wednesday 19 June 2024.**

Regulation 18 Preferred Options Consultation Document
This Regulation 18 Preferred Option consultation is the second formal stage in the preparation of the review of the adopted Chelmsford Local Plan, and a further opportunity for residents, businesses, developers, and other interested parties to get involved.

This is a full draft of the reviewed Local Plan. It includes updated and new policies and sets out proposed sites where new homes, employment and other facilities could be located. It also contains policies that we would use to decide planning applications.

Regulation 18 Preferred Options Integrated Impact Assessment (IIA) Consultation Document

The adopted Local Plan was developed alongside a comprehensive Sustainability Appraisal (SA) and Habitats Regulations Appraisal (HRA) process. For this review process, the Council is including other aspects of sustainable development in an Integrated Impact Assessment (IIA), which covers the following:

- Sustainability Appraisal
- Strategic Environmental Assessment
- Habitats Regulations Assessment
- Health Impact Assessment
- Equality Impact Assessment.

We are consulting on the Integrated Impact Assessment which assesses the Preferred Options against a range of social, environmental and economic indicators.

Broomfield and Danbury Neighbourhood Plans Regulation 16 Consultations

We are also consulting on two Neighbourhood Plans. These have been developed by Broomfield and Danbury Parish Councils, and cover a wide range of issues such as landscape, transport, recreation, heritage, building design, and business. When they are adopted, both Neighbourhood Plans will become part of the Local Plan and will be used for planning decision making.

Find out more at:
www.chelmsford.gov.uk/broomfieldplan and www.chelmsford.gov.uk/danburyplan.

Where to view the documents and how to make representations:

View and comment online
You can view and comment on the consultation documents on the City Council's Consultation Portal at: www.chelmsford.gov.uk/planningpolicyconsult. This is our preferred method to comment.

If you have not used this system before or have any difficulties logging in, please see our guidance notes at:www.chelmsford.gov.uk/lp-portal-guide or call us on (01245) 606330.

View in person
Paper copies can be viewed at the City Council Customer Service Centre, Civic Centre, Duke Street, Chelmsford, CM1 1JE Monday to Friday 10am to 4pm (Please note we are closed on bank holidays).

Comment via email
Comments may be submitted by email: planning.policy@chelmsford.gov.uk
Please include your name and postal address in your message.

A specially designed response form can be downloaded at www.chelmsford.gov.uk/lp-review or made available on request by telephoning (01245) 606330 or emailing planning.policy@chelmsford.gov.uk.

Paper comments
You can submit your comments by post or deliver them in person in the following ways:
Post: Spatial Planning Services, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE
By hand: Monday to Friday 10am to 4pm - Customer Service Centre, Civic Centre, Duke Street, Chelmsford, CM1 1JE (outside of these hours you can use the post box outside the Customer Service Centre).

If you do not have access to a computer, you can request paper copies. A charge will be made to cover printing and postage costs.

If you have difficulties making representations by e-mail or post due to a disability, please call us (01245) 606330.

How to find out more:

We will be hosting an online virtual exhibition for the Local Plan Preferred Options Consultation as well as having in-person exhibitions at the Council Offices. Here you can view our exhibition boards which contain a summary of the consultation (please note both forms of exhibition will have the same information available).

Local Plan Virtual exhibitions: Will be available to view via www.chelmsford.gov.uk/lp-exhibition

Local Plan in-person exhibition: Drop in exhibitions will take place at the Civic Centre, where you will be able to speak to a representative of the Council. There is no booking required to attend these exhibitions, which will take place at the Chelmsford City Council Chamber, accessed via Customer Service Centre, Civic Centre, Duke Street, Chelmsford, CM1 1JE on the following dates and times:

- Thursday 16 May 2024, 6pm to 8pm
- Friday 17 May 2024, 1pm to 3pm
- Saturday 18 May 2024, 10am to 12noon
- Thursday 13 June 2024, 6pm to 8pm
- Friday 14 June 2024, 1pm to 3pm
- Saturday 15 June 2024, 10am to 12noon *(with British Sign Language interpreter available on this date).*

Further Local Plan exhibitions will be on display as follows. These will not be staffed.

- Monday 20 May to Friday 24 May, 7am to 6.30pm at High Chelmer Shopping Centre, 15a Exchange Way, Chelmsford, CM1 1XB
- Thursday 30 May, Friday 31 May, Monday 3 June to Friday 7 June, Monday 10 June and Tuesday 11 June, 9am to 4pm, South Woodham Town Council, Champions Manor Hall, Hullbridge Road, SWF.

Local Plan Website: Please visit our website www.chelmsford.gov.uk/lp-review for further information on the consultation and the Local Plan review process.

Please note that any representations must be received by the Council no later than 4pm on Wednesday 19 June 2024. We are unable accept anonymous representations and any comments received after the closing date cannot be accepted.

The Council will acknowledge receipt of your comments and fully consider them, although we will not enter into individual correspondence.

All duly-made comments will be published on the Council's Consultation Portal in accordance with the General Data Protection Regulations.

Section 149 of the Equality Act 2010 requires that the Council should avoid any form of discrimination and also foster good relations between different ethnic groups. Comments which are deemed to be discriminatory will be inadmissible and will not be accepted.

Jeremy Potter
Spatial Planning Services Manager May 2024

Welcome

Thank you for visiting today

What is the Local Plan

Our Local Plan shapes future growth and development of Chelmsford City Council's area. It sets out a positive vision, identifies where and how new development should take place in the future as well as areas and land uses that will be protected.

Why are we reviewing the adopted Chelmsford Local Plan?

We adopted our current Local Plan in May 2020, and good progress is being made with implementing it.

We need to review the plan at least every five years to make sure it remains up to date and meets the changing needs for development growth to 2041.

This consultation is called the Preferred Options. It is the second of three stages of consultation towards updating the adopted Local Plan and has been prepared following the Issues and Options public consultation in 2022. It is your opportunity to feed into the review process and help to shape the plan and the future of your area.

Government requirements mean that we must provide more homes but our aim is to get the right type of development in the right places to meet the growing needs of local people and businesses, while protecting our environment.

If the Local Plan becomes out of date, the Council could have very little influence over the location of new development and supporting infrastructure. Sites could be promoted for development in locations that the Council and its communities want to protect, and which are not considered sustainable.

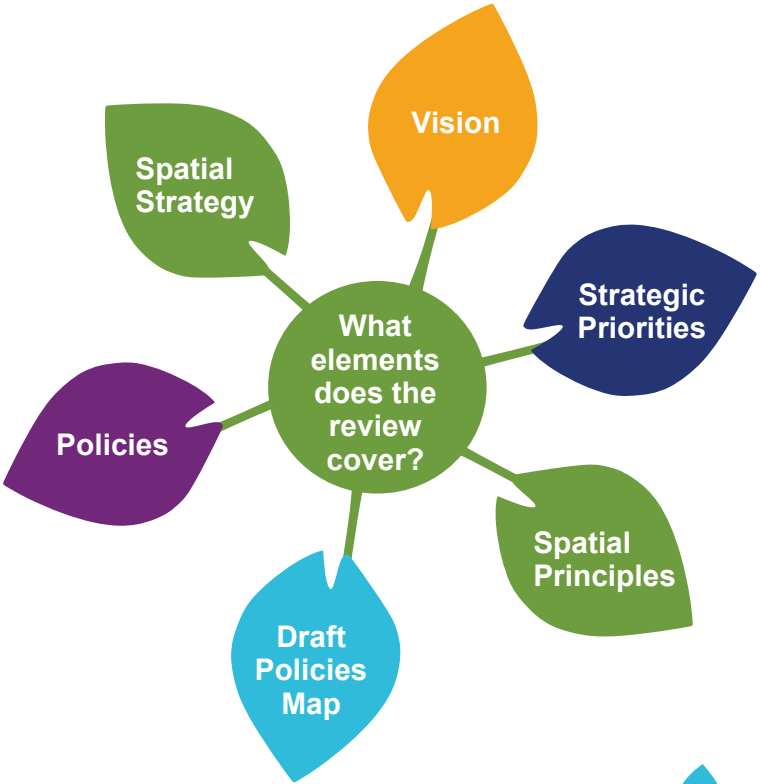
What is included in the consultation?

We want to make sure we cover the right issues and that all the suitable options for accommodating change are considered. The Preferred Options document is a full draft local plan, and includes the following key changes to the adopted Local Plan:

- Updated draft Strategic Priorities
- New draft Vision
- The amount of future development needed, including for homes and jobs
- Draft Spatial Strategy, including new site allocations, for accommodating this future development to 2041 and beyond
- Reviewed planning policies.

Many parts of the adopted Local Plan and its policies are still up to date and generally performing well, so they require no or only partial changes. Some changes and new policies are needed to reflect the latest national planning policy requirements, the Council's new ambitions and aspirations, and new development growth to 2041 and beyond.

The Local Plan is still evolving and no firm decisions have been made at this stage. However, we will not be reopening the debate on development sites which have already been allocated in the adopted Local Plan.



Chelmsford Local Plan

Preferred Options – Background and Challenges

Chelmsford is already an attractive place, comprising the City of Chelmsford, the town of South Woodham Ferrers, numerous villages within attractive countryside and a rich and diverse natural and historic environment. The growth that has taken place, over past 25 years, has helped shape Chelmsford into the successful place it is now.

Vital new infrastructure has been delivered alongside new homes, jobs, shops and leisure opportunities. Chelmsford's economy shows strengths across many sectors, but especially finance, health and education.

Taking into account the projected population increase, we are determined to ensure that future growth continues to take place in a sustainable way. This will bring further improvements to the quality of life for residents and much needed new community and transport infrastructure whilst at the same time protecting and enhancing the natural and historic environment.

The Local Plan will be forward looking, shaping the sustainable planning of Chelmsford's development and infrastructure needs not just in the foreseeable future but also providing a longer-term framework.

Previous consultation

We consulted on the first stage of reviewing the Local Plan, called the Issues and Options, from August to October 2022.

A total of 1,178 responses were received from 711 people or organisations, along with a petition. Responses came from a wide variety of groups and individuals including residents, developers, landowners and their agents, businesses and statutory bodies such as other Local Authorities and Parish/Town Councils.

We have published a document setting out a review of the consultation activity, a summary of the representations we received, and how these comments have been used to develop the Preferred Options document that we are consulting on now.

You can read this 'You said, We Did' feedback report on our website at **www.chelmsford.gov.uk/lp-review.**

All the comments received can also be viewed on the Council's planning policy consultation portal at **www.chelmsford.gov.uk/planningpolicyconsult.**

Challenges

Population – is predicted to increase by 11.5% to 202,300 by 2041. Demographic changes will shape the type and size of accommodation necessary over the Local Plan period.

Economy – 12.5% growth in jobs is anticipated by 2041. Due to its location and high education standards, Chelmsford is expected to accommodate a major share of the forecast new employment growth. Significant additional land for employment is proposed through the Local Plan.

Transport – Chelmsford occupies a key place on the regional road and rail network. New development can generate additional service provision and transport investment, through direct provision of facilities and/or financial contributions from developers.

Environment – Chelmsford enjoys a high quality environment including recreational space, parks, gardens, nature reserves and the designated Green Wedge – and over 1,000 Listed Buildings. Development proposals need to balance the needs of development with the preservation and enhancement of natural and historic assets.

Housing – The Council has declared a housing crisis, with many individuals and families in temporary or unsuitable accommodation, an often expensive private rented sector, and an overall limited supply of affordable housing. The Local Plan can help to address this through housing allocations, setting an appropriate mix of homes, and working with housing partners.

Climate change – A climate and ecological emergency was declared in 2019 to tackle the consequences of climate change and reduce our impact on the planet. Closer to home, the Local Plan can set requirements for zero carbon development, boost active and sustainable travel, require expansion of natural habitats, and improve water efficiency and flood risk management.

Communities – health inequalities and wellbeing opportunities can be tackled through the Local Plan by providing the conditions for stronger and more-connected communities.

Chelmsford Local Plan

What has been considered

The Spatial Strategy, setting out where new development should be located, takes the following as a starting point:

Strategic Priorities + Vision + Spatial Principles + Settlement Hierarchy

Our Strategic Priorities

Our Strategic Priorities are the key priorities which set the overall policy direction for the Local Plan.

Priorities for climate	Priorities for growth	Priorities for place
1. Addressing the Climate and Ecological Emergency	4. Ensuring sustainable patterns of development and protecting the Green Belt	7. Creating well designed and attractive places, and promoting the health and social wellbeing of communities
2. Promoting smart, active travel and sustainable transport	5. Meeting the needs for new homes	8. Delivering new and improved strategic and local infrastructure
3. Protecting and enhancing the natural and historic environment, and support an increase in biodiversity and ecological networks	6. Fostering growth and investment and providing new jobs	9. Encouraging resilience in retail, leisure, commercial and cultural development

The proposed updated Vision

Guiding Chelmsford's growth towards a greener, fairer and more connected community

The Local Plan Vision is a high-level guiding statement that sets out what is important for a place and how change will be managed in the future. It is a core part of a Local Plan and all the policies in the Plan will together deliver the Vision. We have reviewed the Local Plan Vision to reflect the new local priorities within the Council's Corporate Plan - Our Chelmsford, Our Plan. We have also considered other national and local priorities and Chelmsford's challenges and opportunities. It has also been simplified, shortened and purposefully aligned to the Corporate Plan, to make it easier to use.

Spatial Principles

The Spatial Principles will ensure that the Local Plan focuses growth in the most sustainable locations.

a) Locate development at well-connected and sustainable locations
b) Protect the Green Belt from inappropriate development
c) Promote the use of suitable previously developed land for development
d) Continue the renewal and enhance the vitality of Chelmsford City Centre and its Urban Area
e) Focus development at the higher order settlements outside the Green Belt and respect the development pattern and hierarchy of other settlements
f) Respect the character and appearance of landscapes and the built environment, and preserve or enhance the historic and natural environment and biodiversity
g) Locate development to avoid or manage flood risk and reduce carbon emissions
h) Ensure development is served by necessary infrastructure and encourage innovation
i) Locate development to utilise existing and planned infrastructure effectively
j) Ensure development is deliverable.

Settlement Hierarchy

Another factor for developing the Spatial Strategy and choosing areas for growth is the Settlement Hierarchy, which ranks towns and villages according to their size, function, characteristics and sustainability.

How much growth are we planning for?

The adopted Local Plan has allocated sites for development which are now coming forward, with Masterplans being approved and planning applications decided or in progress.

We need to work out how many more houses to plan for until 2041 using a formula set by the Government, called the standard method.

Housing requirement for Plan period	**22,567 homes**
Completions 2022-23	822
Adopted Local Plan allocations	12,677
Sites with planning permission	3,745
Windfall allowance (2026-2041)	1,461
New allocations needed	**3,862**

The Local Plan also plans to meet future employment needs by providing additional employment allocations.

Employment requirement for Plan period	**162,646 sqm**
Adopted Local Plan allocations	55,000 sqm
New allocations needed	**107,646 sqm**

New housing development, in particular, will be required to provide supporting infrastructure, services and facilities including for:

- Transport improvements including the New Beaulieu Park Rail Station, Chelmsford North East Bypass, Army and Navy junction improvements, and sustainable travel routes
- Community buildings, schools, healthcare, wellbeing measures, sports and cultural facilities
- Green infrastructure including new Country Parks, open space, green/blue networks, biodiversity and public realm improvements
- Preservation and enhancement of historic assets
- Flood risk management and utility infrastructure

New development allocations will be focused on three growth areas of Central and Urban Chelmsford, North Chelmsford and South and East Chelmsford. This distribution of growth is shown on the Key Diagram.



Discounted locations for development

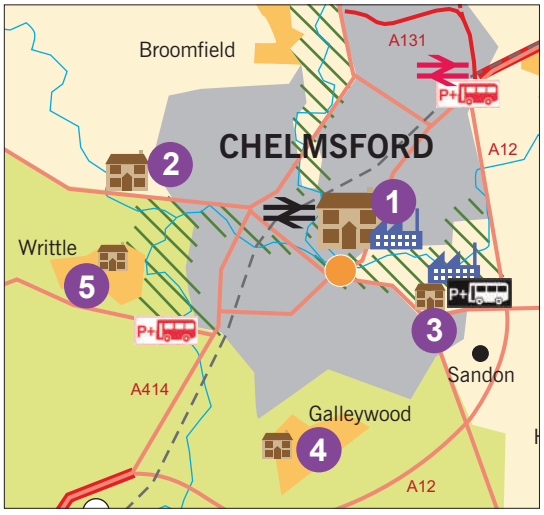
Areas have been discounted as follows:

- The Green Belt, a national designation to prevent encroachment of urban growth into undeveloped areas. This covers almost 34% of the land in the south and west of Chelmsford, shaded in green on the Key Diagram
- The Green Wedge, a key local landscape designation of a green network which prevents urban sprawl and provides for wildlife and nature conservation, flood storage and active travel routes. This covers the river valleys where they pass into Chelmsford's urban area, shaded in hatched green on the Key Diagram
- Areas with known severe constraints/capacities including highways and education
- Areas where no land was being promoted through the Call for Sites exercise
- Areas which did not appear in the Issues and Options consultation document (for housing development).

Chelmsford Local Plan

Growth Area 1 – Central and Urban Chelmsford

Development in this area will deliver a number of benefits including green infrastructure and city greening, enhanced bus services, and opportunities to maximise walking and cycling into the City Centre. Previously developed land in the City Centre will be used to strengthen and expand the City as a major residential and employment centre.



- STRATEGIC EMPLOYMENT LOCATION
- HOUSING: CENTRAL & URBAN CHELMSFORD
- GREEN BELT
- GREEN WEDGE
- RURAL AREA
- CITY/TOWN
- KEY SERVICE SETTLEMENT
- SMALL SETTLEMENT
- BEAULIEU PARK RAIL STATION
- RAIL STATION
- RAILWAY LINE
- AREA CONSIDERED FOR ADDITIONAL PARK AND RIDE FACILITIES
- PARK AND RIDE
- MAJOR ROADS
- A12 IMPROVEMENTS
- ARMY AND NAVY JUNCTION IMPROVEMENTS
- RIVER

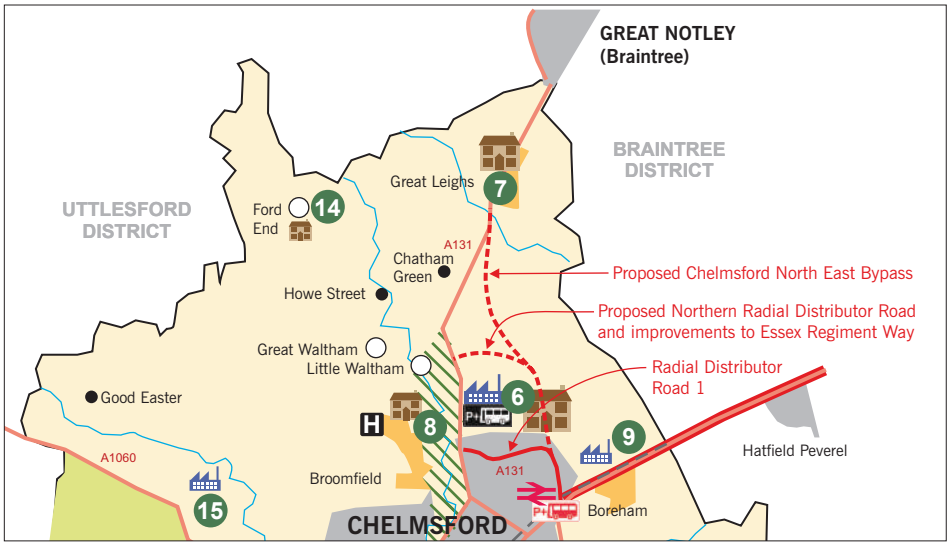
Growth Area 1 – Central and Urban Chelmsford			
Development Allocations		Total Homes	Employment Floorspace
1	Previously developed sites in Chelmsford Urban Area **New sites:** Meadows Shopping Centre/Surface Car Park Former Kay Metzeler, Brook Street Land between Hoffmanns Way and Brook Street Granary Car Park, Victoria Road Coval Lane Car Park Glebe Road Car Park	2,765	4,000sqm Use Class E(g)(i-ii)
2	West Chelmsford	880 plus 5 Travelling Showpeople Plots	
3a	East of Chelmsford - Manor Farm	360	
3b	East of Chelmsford - Land North of Maldon Road		5,000sqm Office/Business Park
3c	East of Chelmsford - Land South of Maldon Road	109	
3d	East of Chelmsford - Land North of Maldon Road	65	
4	Land North of Galleywood Reservoir	24	
5	Land surrounding Telephone Exchange, Ongar Road, Writtle	25	
Area Total		**4,228**	**9,000sqm**

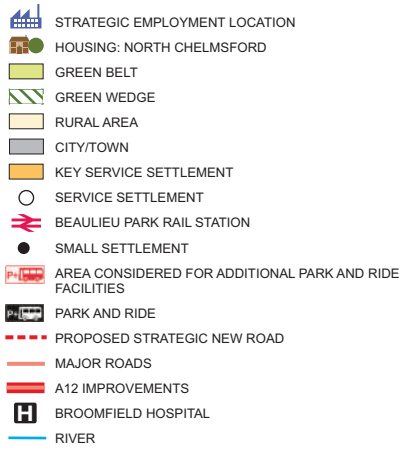
New supporting infrastructure in Growth Area 1
Primary school
Four early years and childcare nurseries
Two new special schools
Country park
Access to Sandford Mill and a visitor centre
Financial contributions to provision of education, community facilities, healthcare, sports and recreation facilities, sustainable transport, local mobility hub and road network enhancements

Chelmsford Local Plan

Growth Area 2 – North Chelmsford

Development in this area will deliver a substantial number of new homes and employment over the Local Plan period, underpinned by a comprehensive package of new infrastructure including new schools, early years and childcare provision, green infrastructure and neighbourhood centres. Significant growth is proposed to Chelmsford Garden Community, along with extensions to two employment sites, and two small village allocations.





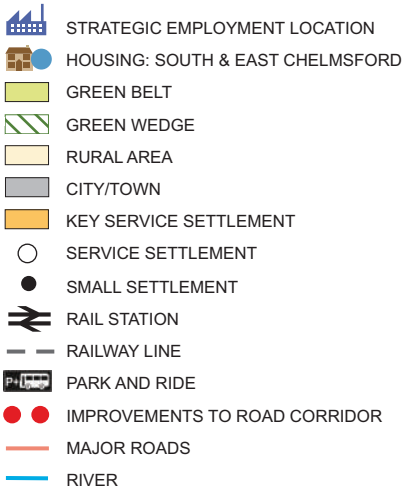
Growth Area 2 – North Chelmsford			
Development Allocations		Total Homes	New Employment Floorspace
6	North East Chelmsford (Chelmsford Garden Community)	6,250, plus 10 Traveller Pitches and 10 Travelling Showpeople Plots	56,946sqm Office/Business Park
7a	Great Leighs - Land at Moulsham Hall	750, plus 5 Travelling Showpeople Plots	
7b	Great Leighs - Land East of London Road	190	
7c	Great Leighs - Land North and South of Banters Lane	100	
8	North of Broomfield	512	
9a	New Site: Waltham Road Employment Area		3,500sqm B2/B8
14a	New Site: Land west of Back Lane, Ford End	20	
14b	New Site: Land south of Ford End Primary School, Ford End	20	
15	New Site: Little Boyton Hall Farm Rural Employment Area		6,000sqm B2/B8
Area Total		**7,842**	**66,446sqm**

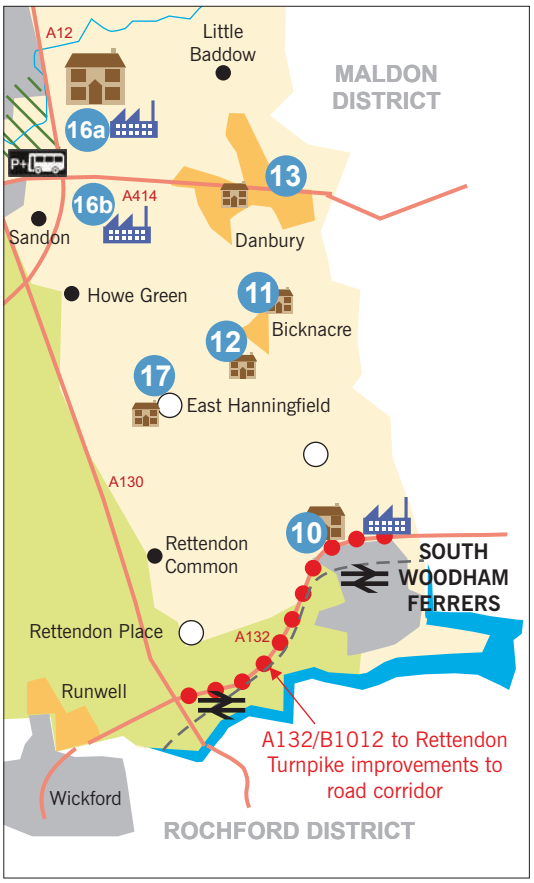
New supporting infrastructure in Growth Area 2
Transport including Phase 1 of Chelmsford North East Bypass, Northern Radial Distributor Road, bus infrastructure
Six village/neighbourhood centres
Secondary school
Five primary schools
Seven early years and childcare nurseries
Country park
Financial contributions to Beaulieu Park Railway Station, provision of education and community facilities, healthcare, sports and recreation facilities, sustainable transport and road network enhancements

Chelmsford Local Plan

Growth Area 3 – South and East Chelmsford

Proposals include a high quality and comprehensively planned new Garden Community to the East of Chelmsford at Hammonds Farm, with a wide range of supporting uses. Also proposed is a strategic employment site, along with four smaller village allocations to contribute towards supporting existing village facilities and services.





Growth Area 3 – South and East Chelmsford		
Development Allocations	Total Homes	New Employment Floorspace
16a New Site: East Chelmsford Garden Community (Hammonds Farm)	3,000 (plus 1,500 homes post 2041), plus 20 Traveller Pitches	43,000sqm Business Space
16b New Site: Land adjacent to A12 Junction 18		43,000sqm Business Space
10 North of South Woodham Ferrers	1,220, plus 5 Travelling Showpeople Plots	1,200sqm Business Space
11a South of Bicknacre	42	
11b New Site: Land at Kingsgate, Bicknacre	20	
11c New Site: Land west of Barbrook Way, Bicknacre	20	
12 St Giles, Bicknacre	32	
13 Danbury	100	
17a New Site: Land north of Abbey Fields, East Hanningfield	15	
17b New Site: Land east of Highfields Mead, East Hanningfield	20	
Area Total	**4,469**	**87,200sqm**

New supporting infrastructure in Growth Area 3
Secondary school, up to four primary schools and eight early years and childcare nurseries
Neighbourhood centres
Transport including Bus Based Rapid Transit infrastructure, safe multi-user access routes, and capacity improvements to A132
Country park
Financial contributions to provision of education and community facilities, healthcare, sports and recreation facilities, sustainable transport and road network enhancements

Chelmsford Local Plan

New Sites in Chelmsford City Centre and Urban Area

We are proposing to allocate some additional sites in Chelmsford City Centre.

Using previously developed – or brownfield – land will help to strengthen the City as a major residential centre to build on its past success and continue its regeneration. It will also reduce the amount of greenfield land we need to allocate.

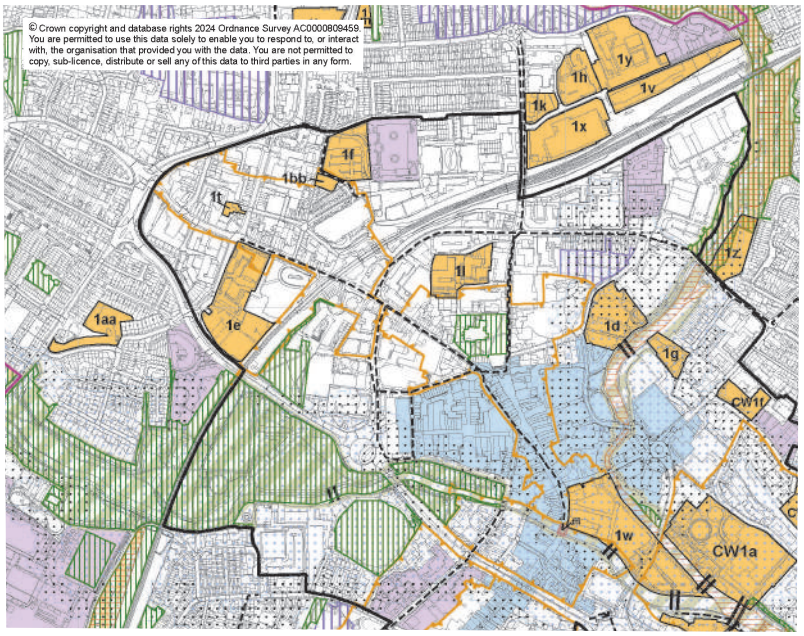
New proposed site allocations will provide around 2,765 new homes including affordable homes.

Site	Proposal	Supporting Infrastructure
1w Meadows Shopping Centre and Meadows Surface Car Park	Around 350 homes	Enhanced pedestrian and cycle routes Local mobility hub Improved access to waterways On-site open space
1x Former Kay Metzeler Premises, Brook Street	Around 185 homes	Play area with equipment Pedestrian and cycle connections Preserve nearby listed buildings Public realm improvements
1y Land between Hoffmans Way and Brook Street	Around 100 homes	Play area with equipment Pedestrian and cycle connections Preserve nearby listed buildings Public realm improvements
1z Granary Car Park, Victoria Road	Around 60 homes	Links to pedestrian/cycle network Preserve nearby listed buildings Retain natural landscaping and setting Make good use of the waterside location
1aa Coval Lane Car Park	Around 40 homes	Retain natural landscaping Provide sustainable drainage and flood risk management
1bb Glebe Road Car Park	12 homes	Conserve the setting of nearby listed buildings

There are 20 allocated sites in the City Centre being brought forward from the adopted Local Plan, including some where numbers have been slightly increased.

Sites in the Urban Area will also be brought forward, as they have already been allocated in the adopted Local Plan. These are at:

- West Chelmsford
- East of Chelmsford
- Galleywood
- Writtle



Chelmsford Local Plan

New Proposed Garden Community

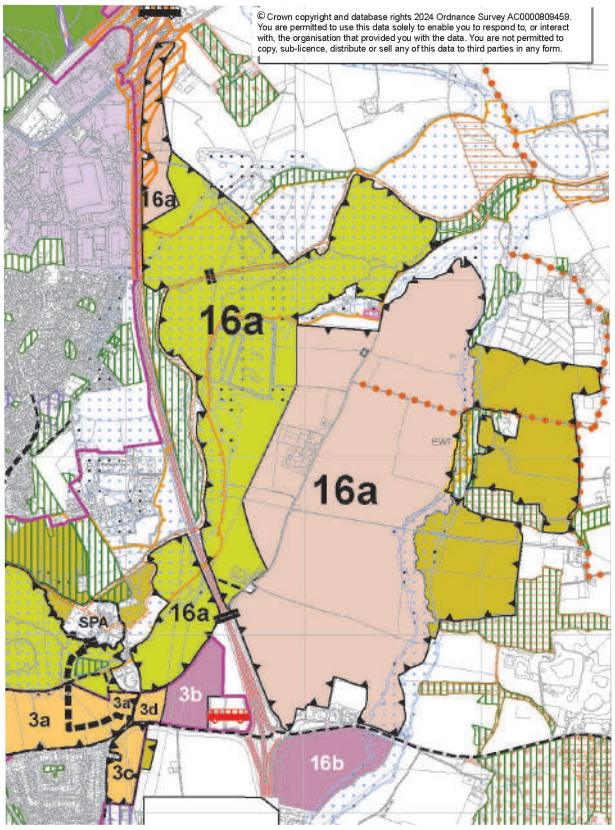
16a – East Chelmsford Garden Community (Hammonds Farm)

We are proposing to allocate land for a new East Chelmsford Garden Community. This is centred on Hammonds Farm, to the east of the A12 and north of the A414 Maldon Road.

New homes including affordable	3,000 (plus 1,500 homes post 2041), and 20 Traveller Pitches
New employment floorspace	43,000sqm
Supporting infrastructure	Country Park and significant new multi-functional green infrastructure and landscape
	Mixed use centres for food and other shopping, community uses, healthcare provision
	All through school, potential sixth form centre, three primary schools, six early years and childcare nurseries
	New access junction from A414 (shared with 16b); pedestrian and cycle connections; mobility hubs and bus transport; safe pedestrian/cycle access routes under and over the A12, including to Park and Ride site, and Beaulieu Park Rail Station
Historic and natural environment	Preserve the Conservation Areas and listed buildings Protect and retain the protected lanes and reinstate historic landscape features
	Conserve Local Wildlife Sites, Nature Reserves, ancient woodlands and SSSI
	Provide sustainable drainage and flood risk management
	Provide a minimum of 20% biodiversity net gain

High quality garden community development will be provided through Garden City Principles. These include:

- community and stakeholder involvement in design and delivery with long-term governance and stewardship arrangements
- meeting the housing needs of all local people
- providing integrated and sustainable transport systems



16b – Land adjacent to A12 Junction 18 – Employment Area

We are also proposing to allocate a separate area of land for new employment uses adjacent to Junction 8 of the A12, south of the A414.

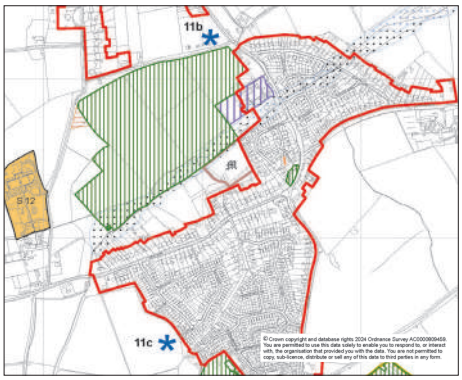
New employment floorspace	43,000sqm for mixed employment types
Supporting infrastructure	New access junction from A414 (shared with 16a) plus multi-user crossings
	Safe pedestrian/cycle access connections including to Park and Ride site, Hammonds Farm, bus stops and Danbury
Historic and natural environment	Preserve Danbury Conservation Area
	Retain boundary trees, plant new trees and extensive landscape buffers

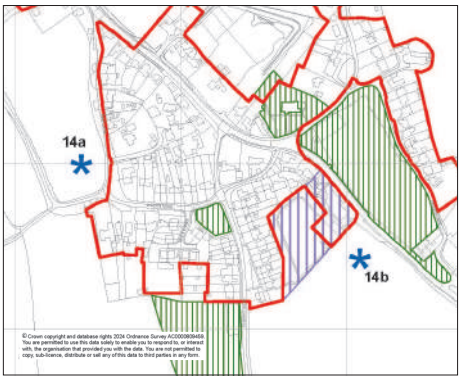
Chelmsford Local Plan

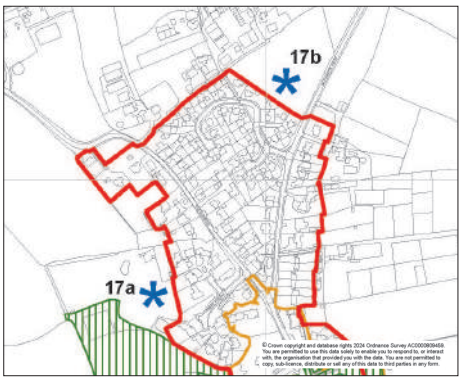
Proposals for Villages

Limited development is proposed in some villages including Bicknacre, Ford End, East Hanningfield, Boreham and Boyton Cross.

We aim to address the Government's requirement to allocate some smaller sites which can be built earlier in the Local Plan period and give smaller development companies the opportunity to build locally. Bicknacre, Ford End and East Hanningfield have primary schools and community facilities, making them suitable for small scale development, which will include affordable homes.

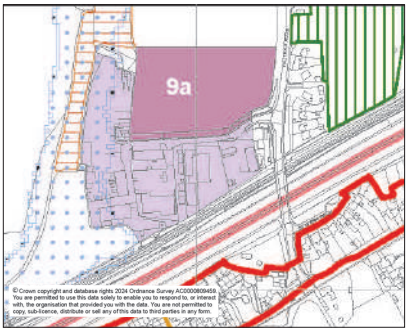


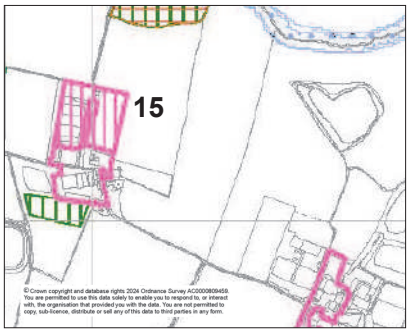




Village	Site	Proposal
Bicknacre	11b Land at Kingsgate, Bicknacre Road	Around 20 homes
	11c Land West of Barbrook Way	Around 20 homes
Ford End	14a Land West of Back Lane	Around 20 homes
	14b Land South of Ford End Primary School	Around 20 homes
East Hanningfield	17a Land North of Abbey Fields	Around 15 homes
	17b Land East of Highfields Mead	Around 20 homes

We also propose to expand two employment sites at Little Boyton Hall Farm, Boyton Cross and Waltham Road, Boreham. Expansion of these well-established employment sites will provide rural employment opportunities and support the sustainable growth and expansion of business in rural areas.





Site	Proposal
9a Waltham Road Employment Area, Boreham	3,500sqm B2/B8 use (general industrial, and storage and distribution)
15 Little Boyton Hall Farm Rural Employment Area, Boyton Cross	6,000sqm B2/B8 use (general industrial, and storage and distribution)

Chelmsford Local Plan

What else is in the Local Plan?

We use the Local Plan policies to deliver the Strategic Priorities (what we want to achieve overall) and the Spatial Strategy (locations for growth). The different types of policies are set out below.

Strategic Policies	High level policies including for climate change, social inclusion, the natural environment, infrastructure, and housing requirements
NEW	Proposed new Strategic Policies: Health and Wellbeing, Creating Successful Places, Connectivity and Travel, Future of Chelmsford City Centre
Site Policies	Covering the amount of development, design guidance, and infrastructure that must be provided
Development Management Policies	All planning applications are considered against these policies to make sure they provide what is needed and protect what is important
NEW	Proposed new Development Management Policy: Net Zero Carbon Development (In Operation)
Special Policy Areas	For Broomfield Hospital, Chelmsford City Racecourse, Hanningfield Reservoir, RHS Hyde Hall Gardens, Sandford Mill, ARU Writtle
Development Standards	For all new residential development including privacy, open space, and recycling and waste guidance
Policies Map	All the proposals shown on a map

Other consultations: Integrated Impact Assessment (IIA)

The Local Plan is subject to an ongoing process of assessing its proposals against a sustainability framework. This covers the potential environmental, social, economic and health performance of the Local Plan and any reasonable alternative approaches.

Other consultations: Neighbourhood Plans

Neighbourhood Plans have been developed by Broomfield and Danbury Parish Councils, and cover a wide range of issues such as landscape, transport, recreation, heritage, building design, and business. When they are adopted, both Neighbourhood Plans will become part of the Local Plan and will be used for planning decision making.

Both Neighbourhood Plans are proposing to allocate land for development as follows:

Broomfield	Community-led housing at Saxon Way with open space and a potential GP surgery A community facility for non-residential day facilities and local/informal green space at Broomfield Place You can find out more at: **www.chelmsford.gov.uk/broomfieldplan**
Danbury	Around 93 homes across five sites at Sandpit Field (around 10 homes) Tyndales Farm West (around 65 homes) South of Jubilee Rise (around 2 homes) Woodhill Road (around 14 homes) Mayes Lane (around 2 homes) You can find out more at: **www.chelmsford.gov.uk/danburyplan**

Chelmsford Local Plan

Have your say

Find out more

View the consultation documents on:

- our specially designed consultation portal **www.chelmsford.gov.uk/planningpolicyconsult**
- on our website **www.chelmsford.gov.uk/lp-review**

The consultation documents are:

- Preferred Options Consultation Document 2024
- Integrated Impact Assessment (IIA) of the Review of the Adopted Local Plan: Preferred Options 2024

Visit one of our exhibitions

Thursday 16 May	Council Chamber, Civic Centre	6pm – 8pm
Friday 17 May	Council Chamber, Civic Centre	1pm – 3pm
Saturday 18 May	Council Chamber, Civic Centre	10am – 12noon
Monday 20 May to Friday 24 May	High Chelmer Shopping Centre (unstaffed)	7am – 6.30pm
Thursday 30 May Friday 31 May Monday 3 June to Friday 7 June Monday 10 June Tuesday 11 June	South Woodham Town Council, Champions Manor Hall, Hullbridge Road, SWF (unstaffed)	9am – 4pm
Thursday 13 June	Council Chamber, Civic Centre	6pm – 8pm
Friday 14 June	Council Chamber, Civic Centre	1pm – 3pm
Saturday 15 June *	Council Chamber, Civic Centre	10am – 12noon

** with British Sign Language interpreter available*

How to comment

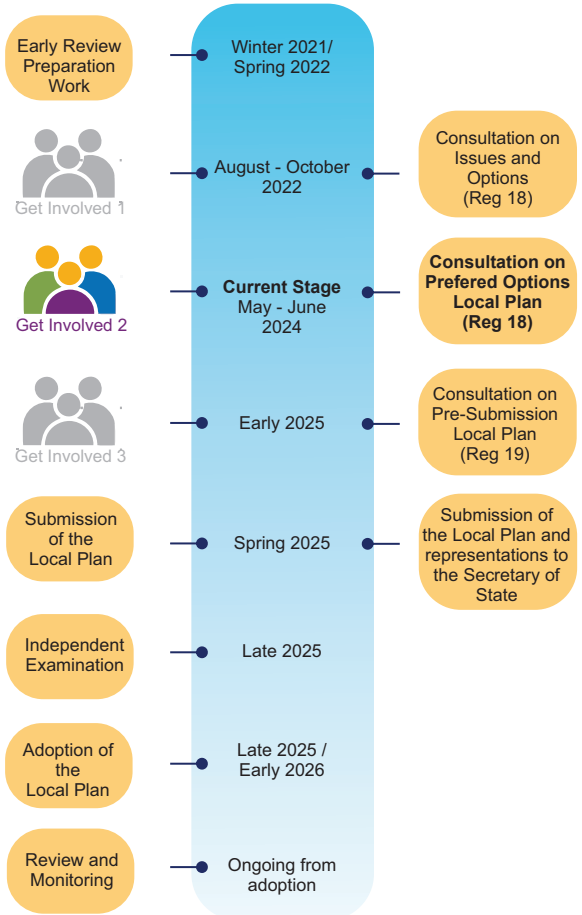
Making your comments through the consultation portal allows you to download the consultation documents and sign up for alerts to future consultation events.

You can also make comments:
By email to **planning.policy@chelmsford.gov.uk**
By post to Spatial Planning Services, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE.

The consultation on the Preferred Options documents runs for six weeks from 10am on Wednesday 8 May to 4pm on Wednesday 19 June 2024.

What happens next

We will consider all the comments received alongside further studies, the findings of the IIA and national planning policy to finalise the Pre-Submission Local Plan, for public consultation in early 2025.



Chelmsford Local Plan

Pop-Up Stand

Review of Chelmsford Local Plan

Chelmsford City Council is reviewing its adopted Local Plan. This will set out where new development will take place up to 2041.



Find out more at
www.chelmsford.gov.uk/lp-review
Get involved by registering at
www.chelmsford.gov.uk/planningpolicyconsult

Chelmsford Local Plan

Pop-Up Stand on Site

Pop up banners and leaflets displayed at the following venues during the PO consultation period May-June 2024.



Riverside Leisure Centre



Chelmsford Sports & Athletics Centre



SWF Leisure Centre



Chelmsford Museum

Click on the link, or copy and paste into your browser, to view the consultation materials.

Local Plan Video: https://youtu.be/ZGpTRMhDIhw



Local Plan Virtual Exhibition: https://chelmsford-2024.vercel.app/



Chelmsford Local Plan Review

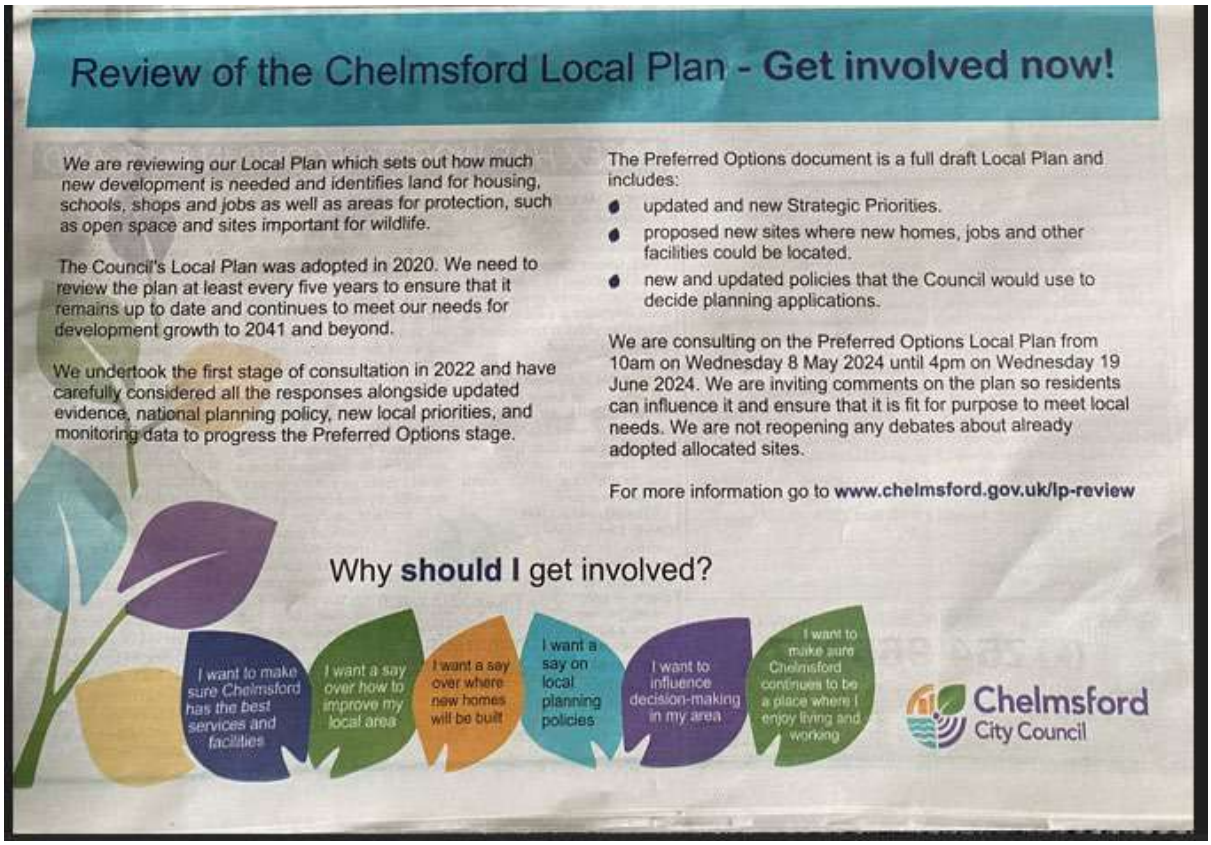
Chelmsford City Council is consulting on a review of its adopted Local Plan with the Preferred Options consultation running from **8 May 2024 to 19 June 2024.**

View our exhibition to find out more. There are also links to the main consultation material.

This is the second of three stages of consultation towards updating the adopted Local Plan, and has been prepared following initial consultation in 2022. We want to make sure we cover the right issues and that all the suitable options for accommodating change are considered. This is your opportunity to feed into the review process and help to shape the plan and the future of your area.

Essex Chronicle Advert

May 2024



City Life Articles

Chelmsford City Life

Home News What's on Community

Top topics culture outdoors green spaces

News Community

Next stage of public consultation on Chelmsford's Local Plan set to start in May

By **Charlotte Maltby**

6 March 2024 planning local plan



The city council is reviewing its Local Plan to guide sustainable growth to 2041.

Chelmsford City Life

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Top topics culture outdoors green spaces

News

Your opportunity to shape Chelmsford's future growth

By **Corporate Communications**

8 May 2024 planning local plan city consultation



...w do you want Chelmsford to look in twenty ...rs' time?

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Planning talking points: calming the waters

By **Corporate Communications**

9 May 2024 local plan planning sustainability consultation



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Planning talking points: can our homes be good for nature?

By **Corporate Communications**

17 May 2024 sustainable growth biodiversity local plan



...leavers are often celebrated by ecologists as 'nature's engineers'. When they build dams,

Chelmsford City Life

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Top topics culture outdoors green spaces

News

Planning talking points: planning beyond homes — the big picture

By **Corporate Communications**

22 May 2024 planning local plan



What image does 'planning' conjure up for you? Most people think of homes: houses, flats and maisonettes being built for the growing population. You might think about the national housing crisis and how difficult it is to afford a home in the UK right now, or about where is and isn't appropriate for new homes to go.

However, planning isn't all about homes. The Local Plan, which guides where and what

News

Planning talking points: how a city is shaped

By **Corporate Communications**

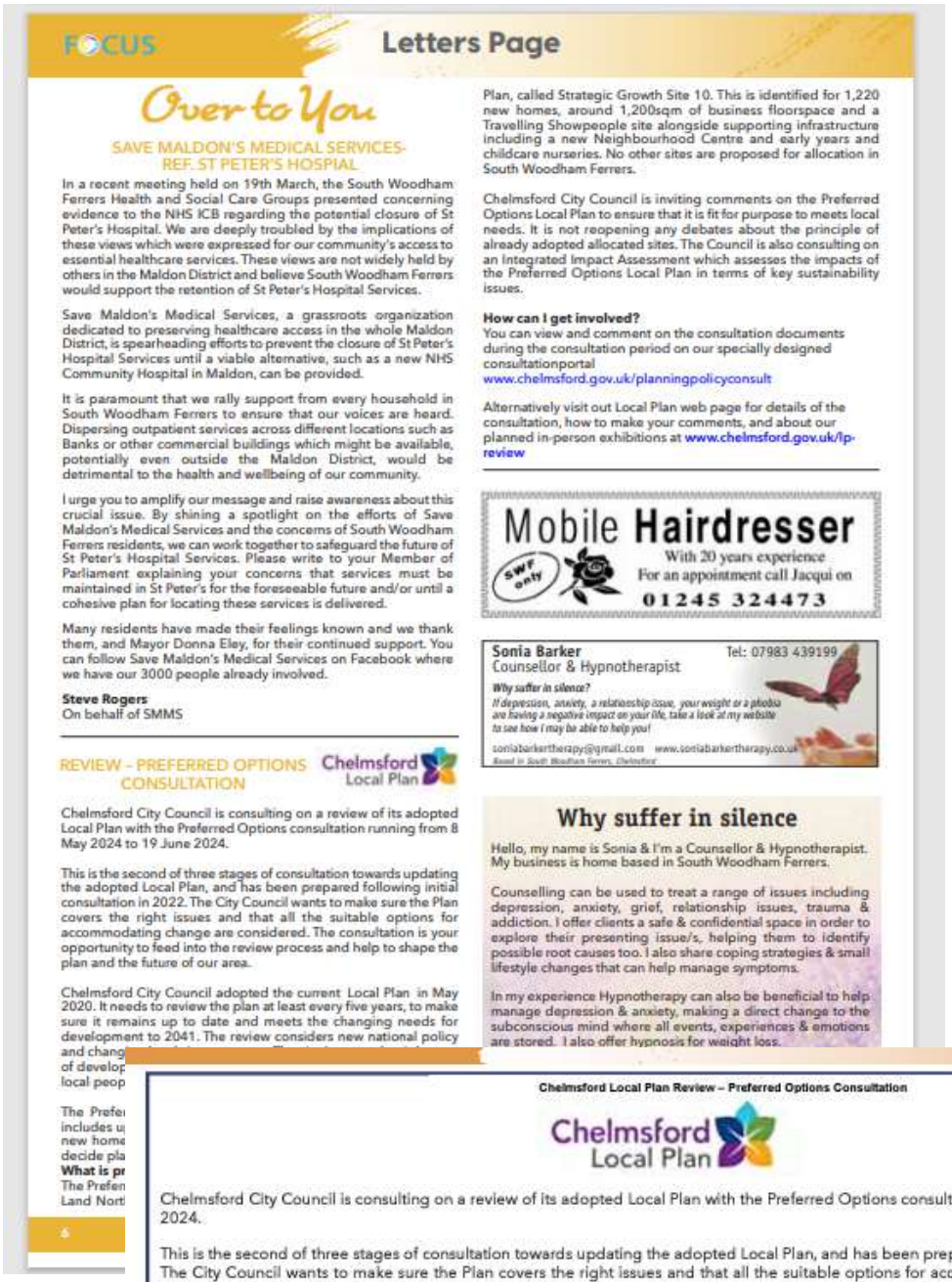
22 May 2024 planning local plan



How Half Moon Square in Chelmsford city centre looks in current day

Have you ever walked through your town or village and wondered how it came to be what it is today? Why the village hall, the church, the shops and houses are laid out in the way they are?

South Woodham Focus Articles - 26 April 2024 and 7 June 2024



FOCUS

Letters Page

Over to You

SAVE MALDON'S MEDICAL SERVICES- REF. ST PETER'S HOSPIAL

In a recent meeting held on 19th March, the South Woodham Ferrers Health and Social Care Groups presented concerning evidence to the NHS ICB regarding the potential closure of St Peter's Hospital. We are deeply troubled by the implications of these views which were expressed for our community's access to essential healthcare services. These views are not widely held by others in the Maldon District and believe South Woodham Ferrers would support the retention of St Peter's Hospital Services.

Save Maldon's Medical Services, a grassroots organization dedicated to preserving healthcare access in the whole Maldon District, is spearheading efforts to prevent the closure of St Peter's Hospital Services until a viable alternative, such as a new NHS Community Hospital in Maldon, can be provided.

It is paramount that we rally support from every household in South Woodham Ferrers to ensure that our voices are heard. Dispersing outpatient services across different locations such as Banks or other commercial buildings which might be available, potentially even outside the Maldon District, would be detrimental to the health and wellbeing of our community.

I urge you to amplify our message and raise awareness about this crucial issue. By shining a spotlight on the efforts of Save Maldon's Medical Services and the concerns of South Woodham Ferrers residents, we can work together to safeguard the future of St Peter's Hospital Services. Please write to your Member of Parliament explaining your concerns that services must be maintained in St Peter's for the foreseeable future and/or until a cohesive plan for locating these services is delivered.

Many residents have made their feelings known and we thank them, and Mayor Donna Eley, for their continued support. You can follow Save Maldon's Medical Services on Facebook where we have our 3000 people already involved.

Steve Rogers
On behalf of SMMS

REVIEW - PREFERRED OPTIONS CONSULTATION

Chelmsford Local Plan

Chelmsford City Council is consulting on a review of its adopted Local Plan with the Preferred Options consultation running from 8 May 2024 to 19 June 2024.

This is the second of three stages of consultation towards updating the adopted Local Plan, and has been prepared following initial consultation in 2022. The City Council wants to make sure the Plan covers the right issues and that all the suitable options for accommodating change are considered. The consultation is your opportunity to feed into the review process and help to shape the plan and the future of our area.

Chelmsford City Council adopted the current Local Plan in May 2020. It needs to review the plan at least every five years, to make sure it remains up to date and meets the changing needs for development to 2041. The review considers new national policy and chang
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Plan, called Strategic Growth Site 10. This is identified for 1,220 new homes, around 1,200sqm of business floorspace and a Travelling Showpeople site alongside supporting infrastructure including a new Neighbourhood Centre and early years and childcare nurseries. No other sites are proposed for allocation in South Woodham Ferrers.

Chelmsford City Council is inviting comments on the Preferred Options Local Plan to ensure that it is fit for purpose to meets local needs. It is not reopening any debates about the principle of already adopted allocated sites. The Council is also consulting on an Integrated Impact Assessment which assesses the impacts of the Preferred Options Local Plan in terms of key sustainability issues.

How can I get involved?
You can view and comment on the consultation documents during the consultation period on our specially designed consultationportal
www.chelmsford.gov.uk/planningpolicyconsult

Alternatively visit out Local Plan web page for details of the consultation, how to make your comments, and about our planned in-person exhibitions at www.chelmsford.gov.uk/lp-review

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Sonia Barker
Counsellor & Hypnotherapist
Tel: 07983 439199
Why suffer in silence?
If depression, anxiety, a relationship issue, your weight or a phobia are having a negative impact on your life, take a look at my website to see how I may be able to help you!
soniabarkertherapy@gmail.com www.soniabarkertherapy.co.uk
Based in South Woodham Ferrers, Chelmsford

Why suffer in silence

Hello, my name is Sonia & I'm a Counsellor & Hypnotherapist. My business is home based in South Woodham Ferrers.

Counselling can be used to treat a range of issues including depression, anxiety, grief, relationship issues, trauma & addiction. I offer clients a safe & confidential space in order to explore their presenting issue/s, helping them to identify possible root causes too. I also share coping strategies & small lifestyle changes that can help manage symptoms.

In my experience Hypnotherapy can also be beneficial to help manage depression & anxiety, making a direct change to the subconscious mind where all events, experiences & emotions are stored. I also offer hypnosis for weight loss.

Chelmsford Local Plan Review – Preferred Options Consultation

Chelmsford Local Plan

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Chelmsford City Council adopted the current Local Plan in May 2020. It needs to review the plan at least every five years, to make sure it remains up to date and meets the changing needs for development to 2041. The review considers new national policy and changing local circumstances. The aim is to get the right type of development in the right places to meet the growing needs of local people and businesses, while protecting our environment.

The Preferred Options Local Plan is a full draft Local Plan. It includes updated and new Strategic Priorities, site allocations for new homes and employment, and policies that will be used to decide planning applications.

What is proposed in South Woodham Ferrers?
The Preferred Options Local Plan carries forward the allocation of Land North of South Woodham Ferrers from the adopted Local Plan, called Strategic Growth Site 10. This is identified for 1,220 new homes, around 1,200sqm of business floorspace and a Travelling Showpeople site alongside supporting infrastructure including a new Neighbourhood Centre and early years and childcare nurseries. No other sites are proposed for allocation in South Woodham Ferrers.

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How can I get involved?
You can view and comment on the consultation documents during the consultation period on our specially designed consultation portal www.chelmsford.gov.uk/planningpolicyconsult

Alternatively visit out Local Plan web page for details of the consultation, how to make your comments, and about our planned in-person exhibitions at www.chelmsford.gov.uk/lp-review

Local Plan Poster

Review of Chelmsford Local Plan –
Get Involved Now!

We are reviewing our Local Plan which sets out how much new development is needed and identifies land for housing, schools, shops and jobs as well as areas for protection, such as open space and sites important for wildlife.

The Council's Local Plan was adopted in 2020. We need to review the plan at least every five years to ensure that it remains up to date and continues to meet our needs for development growth to 2041 and beyond.

We undertook the first stage of consultation in 2022 and have carefully considered all the responses alongside updated evidence, national planning policy, new local priorities, and monitoring data to progress the Preferred Options stage. The Preferred Options document is a full draft local plan and includes:

- updated and new Strategic Priorities
- proposed new sites where new homes, jobs and other facilities could be located
- new and updated policies that the Council would use to decide planning applications



Have Your Say!

The Consultation runs from 10am on Wednesday 8 May 2024 until 4pm on Wednesday 19 June 2024.

Read and comment on the documents at **www.chelmsford.gov.uk/planningpolicyconsult**. They will also be available to read during normal opening hours at the Council's Customer Service Centre in Chelmsford.

There will be an online exhibition and we will also be holding in-person exhibitions at the Civic Centre. These exhibitions will provide an opportunity for you to find out more and discuss the consultation with a Planning Officer. More information can be found at: **www.chelmsford.gov.uk/lp-review**

Visit an exhibition:

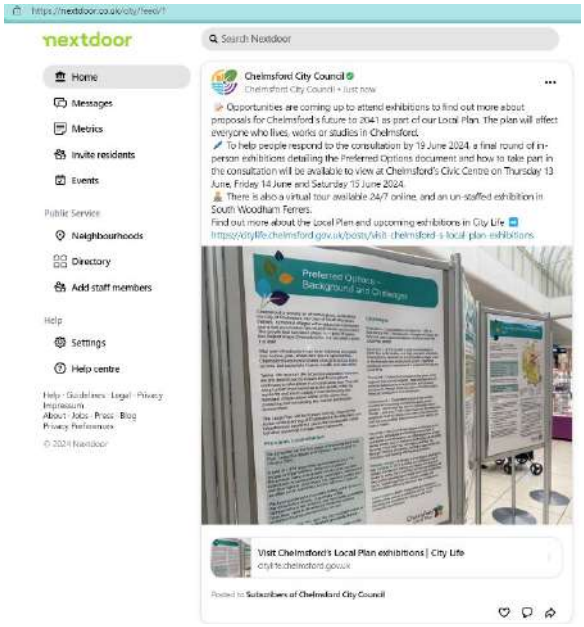
Thursday 16th May 2024	Civic Centre	6pm - 8pm
Friday 17th May 2024	Civic Centre	1pm - 3pm
Saturday 18th May 2024	Civic Centre	10am - 12pm
Thursday 13th June 2024	Civic Centre	6pm - 8pm
Friday 14th June 2024	Civic Centre	1pm - 3pm
Saturday 15th June 2024	Civic Centre	10am - 12pm
A British Sign Language interpreter will be available for the exhibition on 15 June		

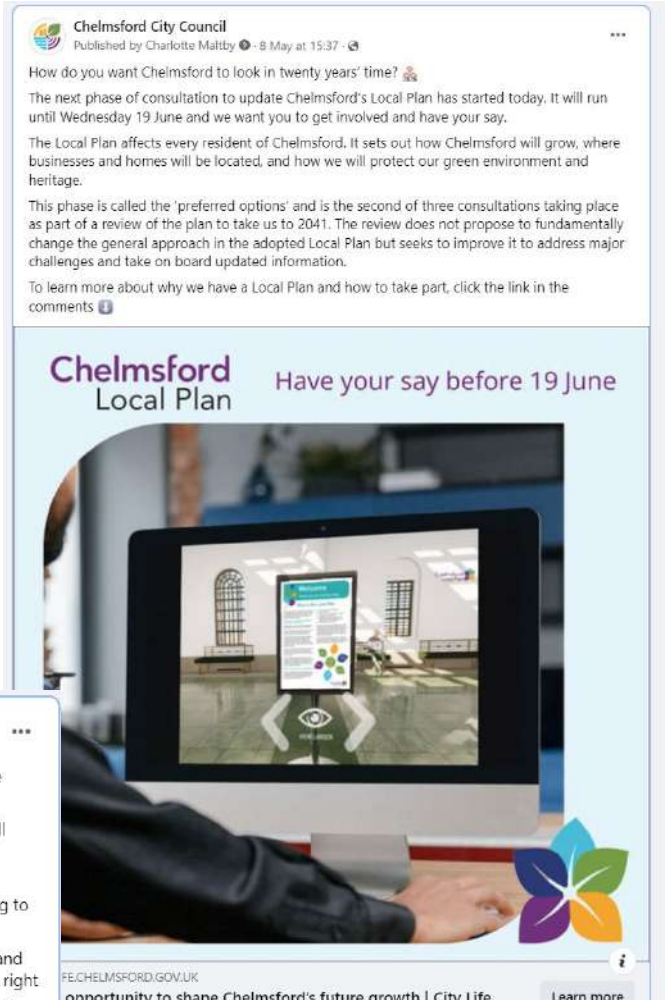
Find out more at **www.chelmsford.gov.uk/lp-review**, telephone (01245) 606330 or email **planning.policy@chelmsford.gov.uk**

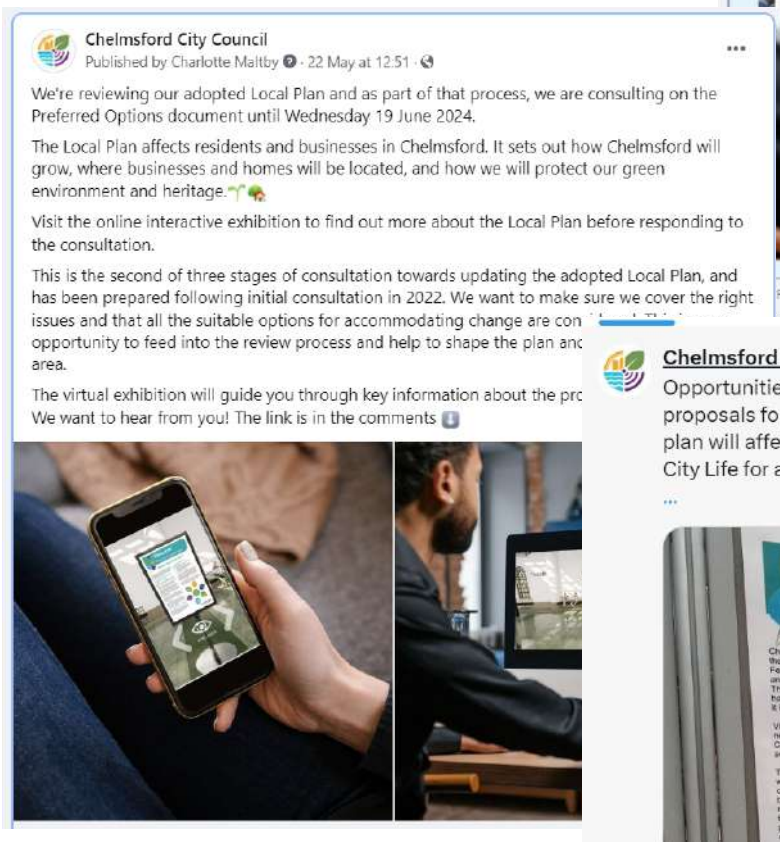
Chelmsford Local Plan

Chelmsford City Council

Examples of Social Media Posts









GovDelivery Mailshot (24th May, 31st May and 7th June 2024)

Visit a virtual exhibition of the Local Plan review

A consultation on Chelmsford's Local Plan is running until **19 June** and there's still plenty of time to take a look at our virtual exhibition. The Local Plan will shape how the district develops over the **next 20 years** and will affect every resident of Chelmsford. Find out more about the proposals and how to have your say.



Read more

Local Plan virtual exhibition

The council is reviewing its Local Plan and, as part of that process, a public consultation is currently running until **Wednesday 19 June.** Our online interactive exhibition is easy to navigate and it will guide you through key information about proposals for the Chelmsford district, which you can then respond to in the consultation.



Read more

Local Plan consultation exhibitions

Opportunities are coming up to attend exhibitions in Chelmsford and South Woodham Ferrers to find out more about proposals for Chelmsford's future to **2041** as part of the Local Plan consultation. Find out more about the exhibitions and how to respond to the consultation, which runs until **4pm** on **19 June.**



Read more

Example Site Notices





LOCAL PLAN CONSULTATION SITE NOTICE 2024

PREFERRED OPTIONS LOCAL PLAN SITE

1aa—Coval Lane Car Park

Chelmsford City Council have published for consultation its Preferred Options Local Plan.

This sets out future growth for Chelmsford up to 2041 and includes proposed site allocations for new residential and employment-led development. Site 1aa on the map shown is a new potential site allocation in the Preferred Options Local Plan.

Read and comment on the plan at www.chelmsford.gov.uk/planningpolicyconsult. Paper copies can also be viewed at the City Council's Customer Service Centre, Civic Centre, Duke Street, Chelmsford, CM1 1JE, Monday to Friday 10am to 4pm (closed on bank holidays).

All information on this consultation is available at www.chelmsford.gov.uk/lp-review

(THIS IS NOT A PLANNING APPLICATION)

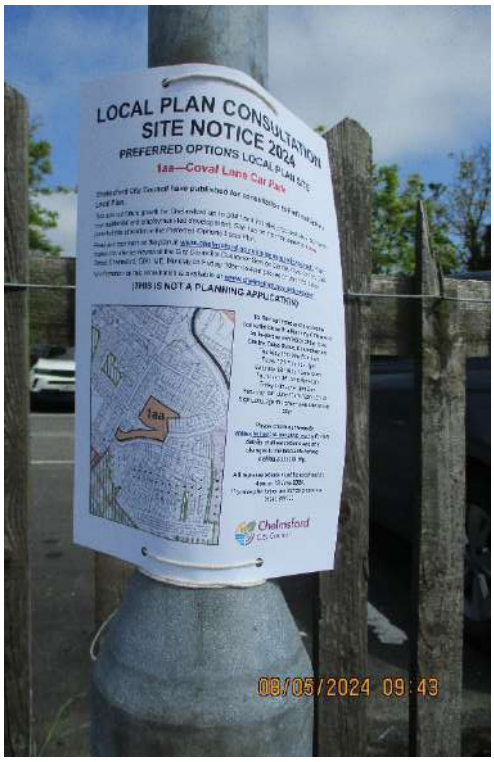


To find out more and discuss the consultation with a Planning Officer visit an in-person exhibition at the Civic Centre, Duke Street, Chelmsford on:
Thursday 16th May 6pm 8pm
Friday 17th May 1pm-3pm
Saturday 18th May 10am-12pm
Thursday 13th June 6pm-8pm
Friday 14th June 1pm 3pm
Saturday 15th June 10am-12pm (British Sign Language interpreter available on this day)

Please check our website www.chelmsford.gov.uk/lp-review for full details of all exhibitions and any changes to the timetable before making a special trip.

All representations must be received by 4pm on 19 June 2024.
If you require further assistance please call 01245 606330

Chelmsford City Council



Staff Email Banner



Bus Stop Adverts





Chelmsford Local Plan

Local Plan Review Newsletter

NUMBER 2 May 2024

What is a Local Plan?

A Local Plan shapes future growth and development of the City Council's area. It sets out a positive vision, identifies where and how new development should take place in the future as well as areas and land uses that will be protected.

Why are we reviewing the adopted Chelmsford Local Plan?

We adopted our current Local Plan in May 2020 and good progress is being made with implementing it. We need to review the plan at least every five years to ensure that it remains up to date and continues to meet our needs for development growth to 2041 including new homes, employment opportunities, and facilities for local people such as new schools, healthcare provision and upgraded transport infrastructure.

Government requirements mean we must provide more homes but our aim is to get the right type of development in the right places to meet the growing needs of local people and businesses while protecting our environment. If the Local Plan becomes out of date, the Council could have very little influence over the location of new development and supporting infrastructure.

What stage is the review at?

We are currently at the Preferred Options stage in the plan review process, with the plan due to be adopted in 2025/26. Many people and organisations commented on the first Issues and Options stage consultation in 2022. All the responses have been carefully considered and used to progress the Preferred Options alongside an updated plan evidence base, national planning policy, new local priorities, and monitoring data.

A 'You Said We Did' feedback report and the evidence base of technical studies can be read on our website: **www.chelmsford.gov.uk/lp-review**

The Preferred Options document is a full draft local plan. It includes updated and new policies and sets out proposed sites where new homes, jobs and other facilities could be located, and contains policies that the council would use to decide planning applications.

We are inviting comments on the plan so residents can influence it and ensure that it is fit for purpose to meets local needs. We are not reopening any debates about the principle of already adopted allocated sites.



New Development: Where and how much?

The Preferred Options plan follows the approach in the adopted Local Plan by continuing to focus new housing and employment growth to the most sustainable locations in three Growth Areas. The existing site allocations in the adopted plan which are not yet built are carried forward in the Preferred Options plan. Many of these sites are now coming forward, with masterplans being approved and planning applications decided or in progress and some sites have started building.

To meet additional growth needs to 2041 it is estimated that we need to allocate new sites for around 3,862 new homes with provision made for a further 1,500 new homes beyond 2041, and around 162,646sqm of new employment floorspace. This is over and above the new homes and employment land in the current plan. To accommodate this identified additional growth, we have reviewed the Spatial Strategy and are proposing new development sites. The preferred Spatial Strategy (Policy S7) shown in the consultation document has been informed by the outcome of the Issues and Options consultation and further evidence. **We are not considering growth in the Green Belt.**



Central and Urban Chelmsford

Continued focus on strengthening the city as a centre for residential, employment and retail. Two existing allocations carried forward to the west and east of Chelmsford maximise cycling and walking opportunities into the City Centre.

1 Previously developed sites in Chelmsford Urban Area
- 2,765 homes (of which around 750 are on proposed new site allocations)
- 9,000sqm Business space

2 West Chelmsford
- 880 homes
- 5 Travelling Showpeople Plots
- Primary school and 2 nurseries
- Neighbourhood Centre

3a-3d East of Chelmsford
- 3a Manor Farm: 360 homes
- 3b Land North of Maldon Road: 5,000sqm Office/Business Park
- 3c Land South of Maldon Road: 109 homes
- 3d Land North of Maldon Road: 65 homes
- Country Park
- New pedestrian and cycle bridge to Sandford Mill

4 Land North of Galleywood Reservoir
- 24 homes

5 Land surrounding Telephone Exchange, Ongar Road, Writtle
- 25 homes

North Chelmsford

North Chelmsford (Chelmsford Garden Community) will continue as a key area for new neighbourhoods and employment opportunities. New smaller allocations at Ford End and extensions to two existing employment areas. Existing allocations carried forward at Great Leighs and Broomfield.

6 North East Chelmsford (Chelmsford Garden Community)
- 6,250 homes
- 10 Gypsy and Traveller Pitches
- 10 Travelling Showpeople Plots
- 56,946sqm Office/Business Park
- Country Park
- Chelmsford North East Bypass
- 4 Neighbourhood Centres
- 1 all-through school
- 3 primary schools with nurseries
- 2 nurseries

7a-7c Great Leighs
- 7a Land at Moulsham Hall: 750 homes
- 5 Travelling Showpeople Plots
- 7b Land east of London Road: 190 homes
- 7c Land North and South of Banters Lane: 100 homes
- Neighbourhood Centre
- Primary school with nursery

8 North of Broomfield
- 512 homes
- Neighbourhood Centre
- Nursery

9a Waltham Road Employment Area
- 3,500sqm B2/B8 Use

14a & 14b Ford End
- 14a Land west of Back Lane, Ford End: 20 homes
- 14b Land south of Ford End Primary School: 20 homes

15 Little Boyton Hall Farm Rural Employment Area
- 6,000sqm B2/B8 Use

South and East Chelmsford

Proposals include a new garden community at East Chelmsford (Hammonds Farm), and a strategic employment site. New smaller allocations in Bicknacre and East Hanningfield. Existing allocations carried forward at South Woodham Ferrers, Bicknacre and Danbury.

10 North of South Woodham Ferrers
- 1,220 homes
- 5 Travelling Showpeople Plots
- 1,200sqm Business Space
- Neighbourhood Centre
- 2 nurseries and potential primary school

11a-c Bicknacre
- 11a South of Bicknacre: 42 homes
- 11b Land at Kingsgate: 20 homes
- 11c Land west of Barbrook Way: 20 homes

12 St Giles, Bicknacre
- 32 homes

13 Danbury
- 100 homes

16a East Chelmsford Garden Community (Hammonds Farm)
- 3,000 homes to 2041 (plus 1,500 homes post 2041)
- 20 Gypsy and Traveller Pitches
- 43,000sqm Business Space
- Country Park
- Neighbourhood Centres
- 1 all-through school
- 2 primary schools and nursery
- 3 nurseries

16b Land adjacent to A12 Junction 18
- 43,000sqm Business Space

17a & 17b East Hanningfield
- 17a Land North of Abbey Fields: 15 homes
- 17b Land east of Highfield Mead: 20 homes

Highlighted text: Proposed new development allocations in the review of Local Plan.

Local Plan policies

There are a number of new and updated policies included within the Preferred Options Local Plan. These cover many topics including housing, climate change, economy, environment, health and wellbeing, travel and transport, heritage, and design. We are not proposing to fundamentally change the general approach in the adopted Local Plan, but we want to take on board updated information and address some of our major challenges including acting on the climate emergency, responding to the housing affordability crisis and strengthening community ties.

It is important to note that the Local Plan is still evolving, and no firm decisions have been made at this stage. We will continue to gather evidence throughout the Local Plan preparation and the Preferred Options consultation will be an important aspect of this. **All the evidence and comments received will be used to prepare the final draft version of the Local Plan.**

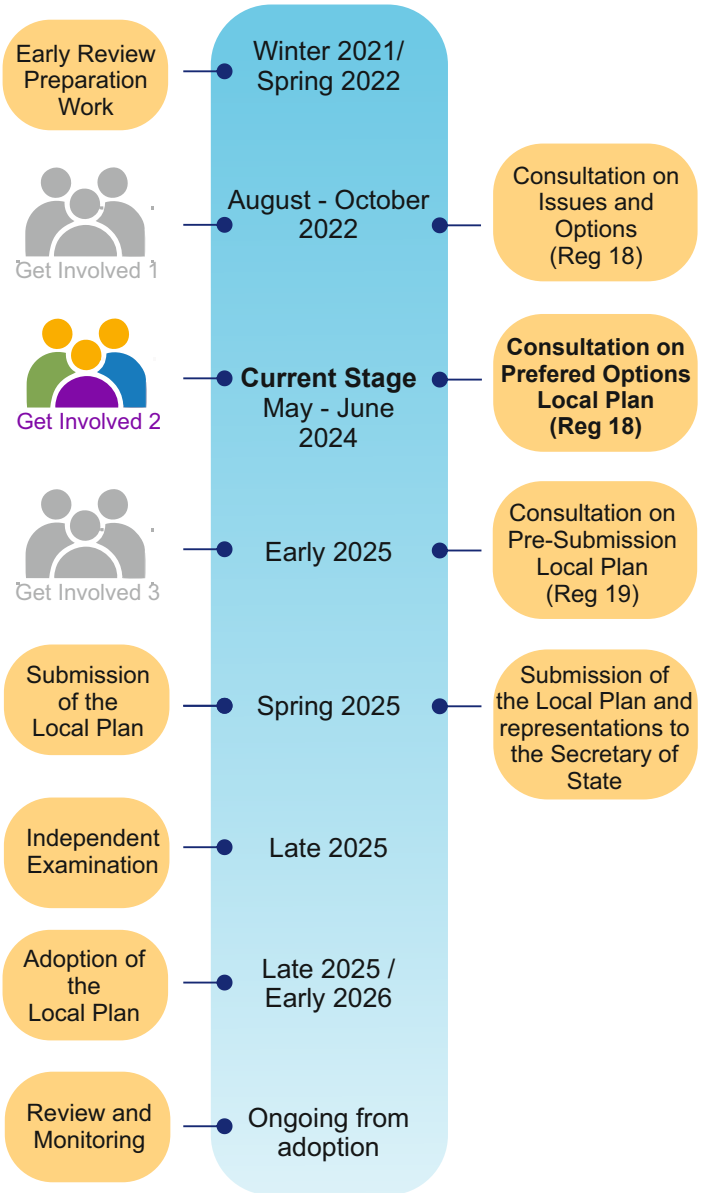
What is the Integrated Impact Assessment (IIA)?

The IIA identifies the key sustainability issues for the Review of the Local Plan. These feed into a framework against which the proposals have been assessed. It covers the potential environmental, social, economic and health performance of the Local Plan and any reasonable alternatives. The IIA includes:

- Sustainability Appraisal (SA)
- Strategic Environmental Assessment (SEA)
- Habitats Regulations Assessment (HRA)
- Health Impact Assessment (HIA)
- Equality Impact Assessment (EqIA)

We will be consulting on the IIA as part of the Preferred Options consultation.

What is the Local Plan timetable?



Where can I view the consultation documents?

The consultation documents will be available to view and comment on via our consultation portal at **www.chelmsford.gov.uk/planningpolicyconsult.** They will be available to read during normal opening hours at the Council's Customer Service Centre in Chelmsford.

There is an interactive online exhibition available during the consultation period – this can be found at **www.chelmsford.gov.uk/lp-review.** We will also be holding in-person exhibitions at Civic Centre, Duke Street, Chelmsford. These exhibitions will provide an opportunity for you to find out more and discuss the consultation with a Planning Officer. These will be held on

- **Thursday 16th May 2024 6pm - 8pm**
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- **Saturday 18th May 2024 10am - 12pm**
- **Thursday 13th June 2024 6pm - 8pm**
- **Friday 14th June 2024 1pm - 3pm**
- **Saturday 15th June 2024 10am - 12pm (with British Sign Language interpreter available)**

Consultation dates and how to have your say



The consultation on the Preferred Options documents runs for a period of six weeks from 10am on Wednesday 8 May 2024 to 4pm on Wednesday 19 June 2024. Comments made before or after these dates will not be considered.
You can respond:

- Via our consultation portal at www.chelmsford.gov.uk/planningpolicyconsult.
- By email to planning.policy@chelmsford.gov.uk
- By post to Spatial Planning Services, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE.

Next Steps
All comments will be used to inform the next stage of the process, the Pre-Submission Local Plan. We plan to consult on this in 2025.

Chelmsford City Council

Document Control Sheet

Essex Highways

Transport Planning
Victoria House
Chelmsford
CM1 1JR

W www.essex.gov.uk/highways

Project Number	B3553RA3
Status	Final
Revision	1
Control Date	12th December 2024

Record of Issue

Issue	Status	Author	Date	Check	Date	Review	Date
1	Draft	JW	12-11-24	SP	15-11-24	SP	15-11-24
2	Final	JW	11-12-24	SP	12-12-24	SP	12-12-24

Approved for Issue By	Date
KS (APM)	12-12-24

Distribution

Organisation	Contact	Number of Copies
Essex County Council	HN	Electronic
Chelmsford City Council	LP	Electronic

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The following table documents a summary of key representations made during the summer 2024 consultation on the transport modelling evidence base for Chelmsford City Council's Local Plan Review Preferred Spatial Approach, along with Essex Highways' response to queries raised.

Table Item ID:	Summary Point:	Summary of detailed representation made:	Essex Highways Modelling Response:
Comment by: Wates Developments and Hammonds Estates LLP – Comment ID: PO24-4653			
1.	Clarity needed on the requirement for CNEB contributions	It is unclear currently from the council's current transport evidence base why contributions to the CNEB are required, as this is not indicated by the results of the Transport Testing of the Preferred Option to 2041 (dated March 2024) and the Local Junction Capacity Assessment Modelling (dated May 2024); rather, the March 2024 document concludes that the completion of the CNEB is only required once capacity issues along the A12 mainline are addressed. On this basis, the requirement for the CNEB is associated primarily with background increases in traffic using the A12, rather than development trips at East Chelmsford Garden Community (Hammonds Farm). Clarification of this point, and therefore the robustness of this the policy requirement for S106 contributions towards this infrastructure, are sought and should be addressed more fully in the next iteration of the Plan.	Essex Highways understand that CCC and ECC are reviewing the funding options for delivery of the CNEB. Whilst the strategic modelling undertaken to support the Local Plan transport evidence base suggests that the distribution of trips between Hammonds Farm and the CNEB will be small (<10%), approximately one third of development trips to/from Hammonds Farm are shown in the forecast modelling to access the A12 Junction 19 Boreham Interchange, at the southern end of the CNEB.
Comment by: Wates Developments and Hammonds Estates LLP – Comment ID: PO24-4743			
2.	Disagreement on early conclusions regarding requirements for Hammonds Farm	Do not agree with some of the early conclusions about the requirements for the East Chelmsford Garden Community (Hammonds Farm). The executive summary on Page 11 of the Transport Appraisal of the Preferred Option (March 2024) states that: "Critical to the planning application process should be a requirement to ensure that background traffic flows along the A414 are not unreasonably delayed by the addition of development trips. This may well require significant highway measures in the vicinity of the site access".	The wording used in the Transport Appraisal of the Preferred Spatial Approach does not state that highway measures should be implemented to ensure a nil detriment impact of development at Hammonds Farm. Rather, that there is an expectation that sustainable and active mode measures, along with potential highway capacity improvements will be identified as part of the planning application process to mitigate against "unreasonable delays" to these modes –

Table Item ID:	Summary Point:	Summary of detailed representation made:	Essex Highways Modelling Response:
		We disagree with this statement as it is not consistent with NPPF Paragraph 115, where the key test relates to severity of impact, and not to protecting against "unreasonable delays" or providing "nil detriment" to motorists. Even if subsequent modelling evidence shows an increased period over which drivers would experience delay, it is not the aim of national or local policy to protect the convenience of commuting car drivers.	which could 'help to achieve' a nil detriment impact. By "unreasonable delays" we (Essex Highways) mean, for example, a notable increase in journey times for background traffic flows - including buses and emergency service vehicles and/or delays that lead to a notable worsening of noise and air quality along the A414 corridor.
Comment by: Walshingham Planning, on behalf of Little Baddow, Sandon, Boreham & Danbury Parish Councils – Comment ID: PO24-8576			
3.	5.1.10 Uncertainty in Hammonds Farm forecast beyond 2041	Both December 2023 and March 2024 evidence documents refer to uncertainty in forecasting forward beyond 2041 and therefore do not test more than 3,000 dwellings at East Chelmsford Garden Community (Hammonds Farm). There will always be uncertainty which requires addressing in forecasting, and whilst development locations beyond this Local Plan Review to 2041 are not known, it is considered that a sensitivity assessment of the East Chelmsford Garden Community in 2041 with 4,500 dwellings could provide an initial indication of the scale of impacts and mitigation required and may be helpful during the next stage of Local Plan evidence and formulation of the council's IDP. Trip Generation: The Strategic Growth Site Policy 16a (Hammonds Farm) includes residential proposals for up to 4,500 dwellings to the period 2048. The Chelmsford VISUM model is only forecast to 2041 and allows for only 3,000 dwellings at the Hammonds Farm site. Again, the impact on the local highway network and at key junctions is likely to be far greater than is currently predicted as a result of the additional trips generated by the extra 1,500 dwellings.	Alongside the challenges of forecasting background levels of demand and road infrastructure 20+ years into the future and beyond the current Local Plan period, an assessment of an additional 1,500 dwellings at Hammonds Farm would require an assumption to be made on the mitigation already in place to support a 3,000 dwelling development by 2041. The scope and delivery timeframes for this mitigation have yet to be agreed between developers and ECC/CCC. Observations from the strategic modelling suggest that without capacity improvements, additional development traffic added to the A12 corridor would result in a wider dispersal of background traffic and/or reductions in peak hour trips being modelled. Therefore, the scale of impact from a further 1,500 dwellings, and the mitigation required, would be difficult

Table Item ID:	Summary Point:	Summary of detailed representation made:	Essex Highways Modelling Response:
			to assess using the modelling methodology adopted for the Local Plan evidence base. It is, however, expected that any capacity improvement measures identified as part of the planning application process would be tested with a full 4,500 dwelling build-out, with assumptions to be agreed with developers on the volume of background growth to be applied.
4.	3.4.3 - 3.4.7 Lack of detailed modelling of site accesses at Hammonds Farm	No work has been undertaken to determine the location, type or scale of the Site access onto A414 Maldon Road required to accommodate the vehicle trips predicted to be generated by the Site.	The modelling undertaken for the appraisal of the Local Plan Preferred Approach, is strategic and area-wide in nature and further local/detailed modelling will be required and undertaken as part of the planning application process for the Hammonds Farm development. Whilst access proposals for Hammonds Farm have yet to be fully designed and assessed, the location of accesses onto the wider road network will be included in the Local Plan Pre-Submission modelling, based on outline developer proposals at this stage.
5.	3.4.8 Lack of detailed modelling of junction 19	Whilst it is also proposed to provide an additional access to serve Strategic Growth Site Policy 16a via the A12 Junction 19 to the north, the modelling undertaken in support of the Preferred Spatial Approach does not include detailed analysis of Junction 19 with Local Plan Review development trips and it is therefore unclear if such an access can be accommodated at this junction to serve the Site.	Outputs from a VISSIM microsimulation model of A12 Junction 19, built to assess National Highways' A12 widening DCO proposals, will be referenced and evaluated within the context of the Local Plan appraisal as part of the next stage of modelling.

Table Item ID:	Summary Point:	Summary of detailed representation made:	Essex Highways Modelling Response:
			Early concept development accesses onto the wider road network will be included in the latest Local Plan Pre-Submission strategic modelling, based on outline developer proposals.
6.	3.4.11 – 3.4.13 Future impact on approach to Beaulieu Station not properly assessed	The 'Transport Impact Appraisal of Spatial Approaches' (December 2023) report suggests that delays along the approach to the Beaulieu Rail Station should be monitored over time to determine the long-term viability of the route as a bus access link between the proposed allocated Site at Hammonds Farm and the railway station. Whilst this is typical for new developments as part of travel plan monitoring, proposing such a measure once infrastructure is already provided may be short sighted. The report goes on to say that "should future journey times to Beaulieu Station via the Boreham Interchange increase substantially, consideration should be given to placing additional focus on enhancing the provision of sustainable transport links to the existing rail station in Chelmsford city centre. Services could make use of the existing bus lane along the A1114 Essex Yeomanry Way (Baddow Bypass) and improved access through the redesigned Army and Navy Roundabout. However, PM peak traffic congestion along Parkway in the city centre would need to be managed to help improve travel times for buses heading out of the city centre." These statements and worded solutions do not appear to fully address likely issues of congestion on the local highway network. This highlights the fact that further modelling work would be required to assess this scenario.	It is expected that analysis of outputs from the VISSIM microsimulation model of A12 Junction 19 will help to infer the level of future bus accessibility between Beaulieu Station and the proposed Hammonds Farm development. It is not within the practical scope of the Local Plan appraisal to assess the scale of mitigation required along alternative sustainable corridors into the city centre from the Hammonds Farm site. However, the Local Plan transport modelling evidence base does recognise the need for a city centre sustainable access corridor study to be undertaken as part of the Hammonds Farm planning application – should proposals for a bus service to Beaulieu Rail Station be compromised by access difficulties at the Boreham Interchange.

Table Item ID:	Summary Point:	Summary of detailed representation made:	Essex Highways Modelling Response:
7.	3.4.16 – 3.4.17 Evidence does not demonstrate suitable access to Hammonds can be provided	Given that the proposed bus, walking, and cycling infrastructure improvements appear unlikely to achieve the necessary mode shift away from car use as set out above, there is concern as to the ability of appropriate Site access junctions to be provided to accommodate the likely vehicle trips generated by the proposed allocated Sites. The transport modelling evidence base does not clearly demonstrate suitable access can be provided to serve Strategic Growth Site Policy 16a at Hammonds Farm and Strategic Growth Site 16b to the south.	The modelling undertaken for the appraisal of the Local Plan Preferred Approach, is strategic in nature, but where available, early-stage access proposals provided by developers of Local Plan sites will be modelled as part of the Local Plan Pre-Submission appraisal. More detailed modelling to assess the impact of proposed development on the local road network and the detailed mitigation required to accommodate new trips associated with it, will be required and undertaken as part of the planning application process for developments identified as allocated sites in the Local Plan.
8.	4.2.2 - 4.2.8 Use of 2019 model and historic traffic surveys	Modelling for the critical A12 Junctions 18 and 19 are based upon 2019 traffic surveys that were used to support the strategic VISUM traffic model, which notably, has not been calibrated to turning movements at junctions. Traffic flows for modelling of the A12 Junction 18 have been based upon traffic surveys undertaken just prior to the Covid-19 pandemic. Whilst turning movement proportions have been checked against historic 2016 data, travel behaviour and patterns have changed since the pandemic and thus utilising data from this period may be unrepresentative of current conditions. Traffic survey data is typically valid for a period of three years and when considering the significance and scale of the proposed site allocations, use of recent and up to date traffic	The appendices of the 'T002 - Transport Impact Appraisal of Preferred Spatial Approach – March 2024' report contain the findings of a study undertaken to look at the differences in traffic flow patterns around Chelmsford in the years post-Covid-19. Whilst it is accepted that there are statistical differences between pre and post Covid-19 traffic flows at individual locations on the road network, at an aggregate level, there is no significant difference in either the AM or PM peak. This supports DfT findings that overall volumes are still at pre-pandemic levels and have not yet stabilised. Given that the VISUM model uses count data at an aggregate level, the 2019 validation is considered to still be

Table Item ID:	Summary Point:	Summary of detailed representation made:	Essex Highways Modelling Response:
		survey data would be more appropriate for creating a base scenario for junction assessment. The base traffic survey data used to create the Chelmsford VISUM and local junction models requires updating to reflect current travel behaviour and patterns Significant manipulation of historic pre-Covid-19 pandemic traffic survey data has been undertaken to create baseline survey data to support junction assessments. The base traffic survey data used to create the VISUM and local junction models is therefore questionable and requires updating to reflect current travel behaviour and patterns.	appropriate for use and provides a reliable, stable base for the modelling. Additional junction modelling will be undertaken as part of the Pre-Submission Local Plan appraisal which will use traffic data collected in September 2024 along the A12 corridor to improve base junction model validation/calibration in post-Covid conditions. It should be noted that calibration/validation to turning flows at junctions would not be expected for a strategic assignment model of the size developed for Chelmsford. Nevertheless, effort has been made to ensure that turning flows appear reasonable at key junctions, and where differences are noted, findings have been caveated in the analysis.
9.	4.3.1 - 4.3.13 Using 'Low' trip rates underestimates the volume of development trips	It is suggested that the trip rates used in the forecast modelling are low as a result of internalisation and sustainable and active travel mode-share, however, these vehicle trip rate reducing factors would already be accounted for in the trip rates determined from the TRICS database. As such, these low vehicle trip rates used would in fact be a double counting of sustainable and active travel mode-share trips and thus significantly underestimate the vehicle trip generation of the proposed allocated sites. Given that it has already been identified that the proposed bus, walking, and cycling infrastructure improvements proposed as part of the Strategic Growth Area Policy 16a are	The Local Plan appraisal makes use of the core trip rates already found within the VISUM forecast model, which have been used across several studies in Chelmsford. These include; the appraisal of Army & Navy junction design options (the modelling of which has been approved by DfT), the appraisal of the Chelmsford North-East Bypass, and the impact appraisal of the proposed Chelmsford Garden Community to the north of the city centre. It was considered appropriate to use the same trip rate assumptions to maintain consistency in approach across these studies.

Table Item ID:	Summary Point:	Summary of detailed representation made:	Essex Highways Modelling Response:
		unlikely to achieve the necessary mode shift away from car use, and the fact that a development proposal at Northeast Chelmsford of very similar nature to that proposed as part of the Site allocation at Hammonds Farm uses far higher, and as expected vehicle trip rates, for determining development vehicle trips suggests that vehicle trip rates used in the Chelmsford forecast model is significantly underestimated. Residential vehicle trip rates for the Local Plan Review Preferred Spatial Approach that are used in the Chelmsford forecast model appear to be significantly underestimated and the impact on the local highway network and at key junctions is likely to be far greater than is currently predicted	It is recognised that the trip rates used are representative of an aspirational approach to development planning and the levels of trip generation that could be achieved with the successful implementation and uptake of sustainable and active mode infrastructure through travel plan monitoring, penalties for failing to meet targets, monitor and manage practices etc. The trip rates are, however, not considered 'unrealistic', and are aligned with latest NPPF guidelines for Local Plan development.
10.	4.4.4 - 4.4.15 Impact on A12 J18 & lack of mitigation measures	The impact of a Site Access along A414 Maldon Road to serve Strategic Growth Site Policy 16a and Strategic Growth Site 16b is unknown and may cause additional delay and queuing along the A414 Maldon Road approach to the A12 Junction 18. The existing model only assesses the impact of the additional vehicle trips on the A12 Junction 18 without understanding how vehicles queued back along A414 Maldon Road may block or impact on the operation of a Site access junction. The 'Transport Impact Appraisal of Preferred Spatial Approach' (March 2024) document suggests that initial proposals to mitigate the impact on the A12 Junction 18 are contained in the October 2022 Stantec report 'Hammonds Farm Transport Technical Report'. These proposals will be refined through the ongoing Local Plan master planning and planning application process. A review of the Stantec report does not identify any other mitigation measures beyond those already proposed as part	Where available, early-stage access proposals provided by the Hammonds Farm developer will be modelled as part of the Local Plan Pre-Submission appraisal. However, the modelling undertaken for the appraisal of the Local Plan Preferred Approach, is strategic in nature, with a focus on the wider patterns of impact across the road network in Chelmsford. This is understood to be commensurate with the typical scope of modelling required for a Local Plan transport appraisal. More detailed modelling will be undertaken to assess the impact of development and access proposals on the local road network, and the detailed mitigation required, through developer Transport Assessments as part of the planning

Table Item ID:	Summary Point:	Summary of detailed representation made:	Essex Highways Modelling Response:
		of the Site allocation requirements, which include the sustainable and active travel bridge over the A12 and bus priority link to the north at the A12 Junction 19.	application process for the Hammonds Farm development.
11.	4.4.21 – 4.4.29 A12 J19 Boreham Interchange, insufficient evidence to demonstrate access at Hammonds can be accommodated	In order to demonstrate that the A12 Junction 19 can be considered a suitable option for providing access to the Hammonds Farm site, further modelling work is required Whilst the VISUM strategic forecast model incorporates the latest Junction 19 designs and signal timings published as part of the A12 Chelmsford to A120 widening scheme DCO, it does not allow for the Site access to the Strategic Growth Site Policy 16a at Hammonds Farm. It should also be noted that all modelled junctions except for two, one of which is the A12 Junction 19, were built using demand flows taken directly from the 2041 Chelmsford VISUM forecast model for scenarios with and without Local Plan Review development trips. Current modelling results related to the A12 Junction 19 that are presented in the evidence base in support of the Preferred Spatial Approach cannot be relied on and do not demonstrate that at this stage, an additional access from the A12 Junction 19 to serve the allocation of development at Hammonds Farm can be accommodated.	Updated junction modelling will be undertaken as part of the Pre-Submission Local Plan appraisal, including the use of outputs from a VISSIM microsimulation model of A12 Junction 19, built to assess National Highways' A12 widening DCO proposals. Where available, early-stage access proposals provided by the Hammonds Farm developer will be modelled at A12 Junctions 18 and 19.

14 December 2023

Ref: LBD/AONBAPP/DEC23

Mail Hub
Worcester County Hall
Spetchley Road
Worcester
WR5 2NP

<<By email only>>

Dear

Thank you for your email enquiry and for sharing your report on the natural, cultural, and historical significance of the Little Baddow and Danbury area in Essex with Natural England in support of the Danbury Ridge and the Chelmer Valley National Landscape Working Group's ambition for a National Landscape designation in this area. We acknowledge the accompanying letters of support for the Danbury Ridge and the Chelmer Valley National Landscape you propose submitted to us alongside your report from the National Trust, Essex Wildlife Trust, Essex Waterways & the Essex Bat Group.

By way of update, since our last written correspondence, Natural England are still working on the current round of National Landscape (Area of Outstanding Natural Beauty, AONB) designation projects announced in June 2021, these are:

- A new Yorkshire Wolds AONB
- A new Cheshire Sandstone Ridge AONB
- An extension to the Surrey Hills AONB
- An extension to the Chilterns AONB

Landscape designation is a multi-year process and we remain fully resourced and committed to the above four cases. Additionally, following on from Government's announcement on 29 November 2023, we will be starting work to consider the possibility of designating a new National Park. We are therefore not taking on any additional new designation projects at the current time.

It is important to note that there is no formal application process for National Park or National Landscape (AONB) designation. Natural England takes an evidence-led approach, using information such as the All-England Strategic Landscape Mapping Assessment Tool. We are also guided by government policy steers, and any future search will be England-wide.

Natural England is not in a position to confirm timescales for when our next landscape designation programme will commence, nor to confirm the format for the process. We will, however, keep the report you have submitted to us and supporting documentation on file in addition to any further appendices you wish to submit to us.

Yours sincerely,

West Anglia Area Team

WELBECK STATEGIC LAND V LIMITED

6TH FLOOR, ONE LONDON WALL, LONDON, EC2Y 5EB TEL: 020 7529 3800

By email only:
Jeremy.Potter@chelmsford.gov.uk

28th October 2024

Dear Jeremy,

Re: Land West of Barbrook Way, Bicknace (Draft Allocation 11c)

Further to our discussions, I write in relation to the above draft allocation, and in response to some third party comments received as part of the Preferred Options Consultation on the Local Plan Review that closed in June 2024. It is understood that concerns have been raised in relation to access being deliverable from Barbrook Way. This Statement seeks to provide comfort that the site is deliverable.

For context prior to entering the Promotion Agreement for the land Welbeck Land undertook significant due diligence into potential access points for the development. This included a detailed topographical survey and significant investigation into any legal issues related to land ownership.

The results of our highways search would indicate the extent of the adopted highway does not include this sliver of land albeit due diligence is ongoing to see if the underlying s38 agreement for Barbrook Way can be secured in order to check that the highways search result is correct and the sliver of land is not, indeed, adopted.

We have also undertaken detailed investigations into any potential third parties (persons or entities) that may be able to successfully claim ownership of the land. Our research has not identified any such party that could realistically make such a claim. With this information we have been able to secure an indemnity insurance policy which benefits the development site, successors in title, service providers and alike to protect against the risk, however slim, of any third party either seeking to claim ownership of the third party strip and being successful in doing so.

These indemnity insurance policies exist precisely for such scenarios which are not unusual, particularly given errors in the mapping on Land Registry UK, often owing to many of the boundaries being drawn historically. Therefore, we strongly believe that the Council should consider this sufficient to demonstrate that the site is deliverable, and there is no reason to discount it or remove its allocation for housing in the forthcoming Plan.

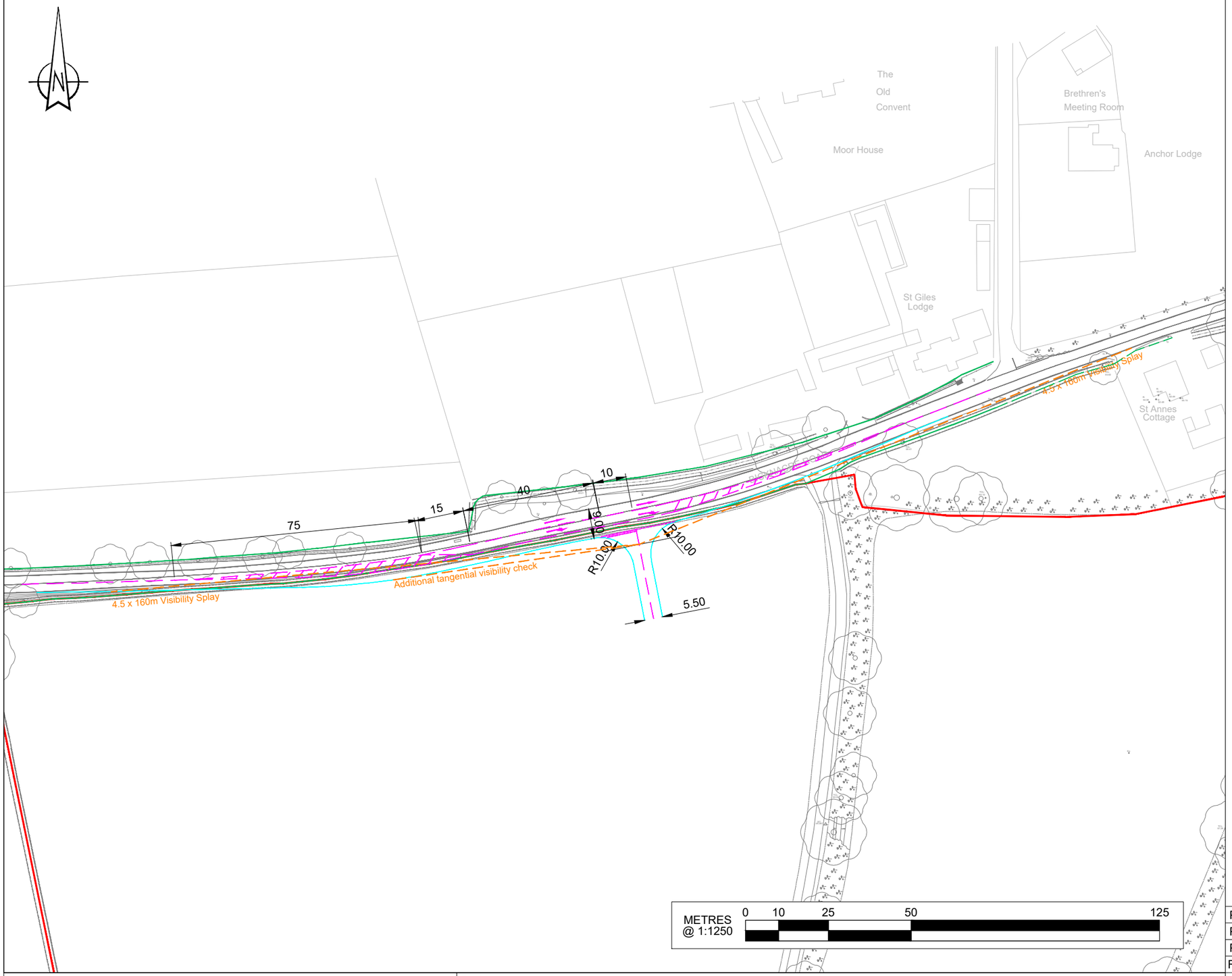
Furthermore, and as provided to the Council we have to date produced several indicative masterplans of varying scale from 160 to 250 dwellings. Given our confidence in our ability to rely on Barbrook Way we have indicated this as our primary access.

However, our detailed investigations have demonstrated that alternative access points are available from Priory Road. Although it is acknowledged that this is not the Council's preferred option, it does

assist in demonstrating that the site is not ransomed. Enclosed are the alternative options for information.

Yours sincerely

Alice Lack MRTPI
Director
Welbeck Strategic Land V Limited



NOTES:

1. Do not scale from this drawing, work to figured dimensions only.
2. Dimensions are in metres unless stated otherwise.

KEY:

4.5m x 160m Visibility Splay*

Highway Boundary confirmed by ECC

Interpolated Highway Boundary subject to confirmation by ECC

*Table 2.10 DRMB CD109 design speed 85kph (see below). Based on speed survey data of 85th percentile Eastbound: 76.2kph (Eastbound), 79.5kph (Westbound), August 2024

Table 2.10 Design speed related parameters

Design speed kph	120	100	85	70	60	50	V2/R
Stopping sight distance (metres)							
Desirable minimum	295	215	160	120	90	70	-
One step below desirable minimum	215	160	120	90	70	50	-

Designed in accordance with DMRB CD 109, CD123 and Essex Design Guide. See above for design speed

REV	DESCRIPTION	DRN	CHK	APP	DATE
P03	Amended Location	GR	PC	PC	11.10.24
P02	Confirmation of Highway and Site Boundaries	GR	MN	PC	11.09.24
P01	Initial	GR	PC	PC	28.08.24

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Project: Bicknacre

Title: Site Access Ghost Island
Bicknacre Road

Client: Welbeck Land

Status: INITIAL

Status Code: -

Drawn	GR	27.08.2024
Designed	GR	27.08.2024
Checked	PC	28.08.2024
Approved	PC	28.08.2024

Scale: 1:1250@A3

Revision: P03

Project No.: 109436-XXXX-DR-H-000003



NOTES:

1. Do not scale from this drawing, work to figured dimensions only.
2. Dimensions are in metres unless stated otherwise.

KEY:

4.5m x 160m Visibility Splay*

Highway Boundary

*Table 2.10 DRMB CD109 design speed 85kph (see below). Based on speed survey data of 85th percentile Eastbound: 76.2kph (Eastbound), 79.5kph (Westbound), August 2024

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One step below desirable minimum	215	160	120	90	70	50	-

Designed in accordance with DMRB CD 109, CD123 and Essex Design Guide. See above for design speed

REV	DESCRIPTION	DRN	CHK	APP	DATE
P02	Confirmation of Highway and Site Boundaries	GR	MN	PC	11.09.24
P01	Initial	GR	PC	PC	28.08.24

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Project: Bicknacre

Title: Site Access Ghost Island
Bicknacre Road

Client: Welbeck Land

Status: INITIAL

Status Code: -

Drawn	GR	27.08.2024
Designed	GR	27.08.2024
Checked	PC	28.08.2024
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Scale: 1:1250@A3

Revision: P02

Project No.: 1090436-XXXX-DR-H-000003



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Chelmsford City Council

Appendix Bi Preferred Options List of Respondents (Organisations)

Anglian Water Services Ltd

ARU

Barratt David Wilson (Eastern Counties)

Basildon Borough Council

Bellway Homes Ltd (Essex)

Black Notley Parish Council

Bloor Homes (Eastern)

Boreham Conservation Society

Braintree District Council

Brentwood Borough Council

Broomfield Parish Council

C J H Farming Ltd

Castle Point Council

Chelmer Housing Partnership

Chelmer Valley Landscape Group

Chelmer Village Parish Council

Chelmsford & Central Essex RSPB Local Group

Chelmsford & Mid Essex CAMRA

Chelmsford Canoe Club

Chelmsford Diocese Board of Finance

Chelmsford Garden Community Consortium

Chelmsford Garden Community Council

Chignal Parish Council

Cliffords Group Ltd

CPRE Essex

Crest Nicholson

Croudace Homes

Cycling UK

Danbury Parish Council

Dandara

Dandara Eastern

Daniel James Developments

Dominus Chelmsford Limited

Environment Agency

Epping Forest District Council

Essex & Suffolk Water

Essex Bridleways Association

Essex County Council

Essex County Fire and Rescue Service

Essex Local Access Forum

Essex Muslim Centre

Essex Police

Essex Waterways Ltd

Essex Wildlife Trust

Exolum Pipeline System Ltd

Ford End Village Hall

Forestry Commission England

Gladman Developments Ltd

Gleeson Land

Good Easter Parish Council

Great Baddow Lawn Tennis Club

Great Baddow Parish Council

Great Waltham Parish Council

Greystoke CB

H R Philpot & Sons

Hallam Land Management

Harris Strategic Land Limited

Hawridge Land

Higgins Group

Highgate Capital Limited

Hill Farm (Chelmsford) Ltd

Hill Residential Ltd

Historic England

Home Builders Federation

Hopkins Homes Ltd

IBA Planning Ltd

J & T Wardrop and the Wardrop Trust

Landvest & Harding Homes

Lewis & Scott Retirement Living

Little Baddow History Centre

Little Baddow Society

Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group

London Borough of Enfield

LVJ Maldon Limited

Maldon District Council

Marine Management Organisation (MMO) HM Government

Martin Grant Homes

McCarthy Stone

Mid and South Essex Integrated Care Board (ICB)

Miscoe Enterprises Ltd

National Gas Transmission

National Gas Transmission System

National Highways

National Trust

Natural England

Newell Properties Development Ltd

NHS Property Services Ltd

North Chelmsford Villages Community Group

Obsidian Strategic

Obsidian Strategic Asset Management Ltd

Omtech Services Limited

Opus Little Waltham Developments Ltd

Paper Mill Lock Cruises Ltd

Park View Group Ltd

Pigeon (Sandon) Ltd

Redrow Homes & Speakman Family

Richborough

Rochford District Council

Rosehart Properties Ltd

S J R Farming

S J U 2016 discretionary settlement trustees

Sandon Parish Council

Saxtons 4x4

Seax Development

Sedum Ltd

South Woodham Action Group

South Woodham Ferrers Residents Party

Southend Borough Council

Sport England

Strettons

Strutt & Parker

Strutt and Parker (Farms) Limited

Swifts Local Network: Swifts & Planning Group

Tarmac

Taylor Wimpey

Telereal Securitised Property GP Limited

The Bucknell Family

The Cathedral School

The Danbury Society

Theatres Trust

This Land

Transport for London

Tritton Farming Partnership LLP

Urban Provincial

Van Diemans Property Company

Vistry Group

Wates Developments and Hammonds Estates LLP

Wates Developments Limited

Weal Properties Ltd

Welbeck Strategic Land V Limited

Whirledge & Nott

Woodham Ferrers & Bicknacre Parish Council

Woodham Walter Parish Council

Writtle Parish Council

Appendix C

Chelmsford Local Plan

Pre-Submission (Regulation 19) Document

You Said We Did Feedback Report

May 2026



Our Planning Strategy 2022 to 2041

Chelmsford Local Plan

Pre-Submission You Said We Did Feedback Report

Abbreviations	**2**
Executive Summary	**4**
Introduction	**10**
Section 1: Summary of Consultation Undertaken	**11**
Section 2: Summary of Representations	**13**
Section 3: Main Issues Raised in Consultation Responses	**17**
Appendix 1	**203**
Appendix 2	**339**
Appendix 3	**372**

Abbreviations

ARU	Anglia Ruskin University
BAE	British defence, security and aerospace company
BNG	Biodiversity Net Gain
BREEAM	Building Research Establishment Environment Assessment Method
CCC	Chelmsford City Council
CGC	Chelmsford Garden Community
CFS	Call For Site
CIL	Community Infrastructure Levy
CNEB	Chelmsford North East Bypass
DFD	Development Framework Document
dpa	Dwellings per annum
DSB	Defined Settlement Boundary
ECC	Essex County Council
EA	Environment Agency
EPOA	Essex Planning Officers Association
EV	Electric Vehicle
FRA	Flood Risk Assessment
GI	Green Infrastructure
GS	Growth Site
GTAA	Gypsy and Traveller Accommodation Assessment
HGV	Heavy Goods Vehicle
HIA	Heritage Impact Assessment
IDP	Infrastructure Delivery Plan
IIA	Integrated Impact Assessment
LCWIP	Local Cycling and Walking Infrastructure Plan
LNRS	Local Nature Recovery Strategy
LPA	Local Planning Authority
MMO	Marine Management Organisation
MRA	Minerals Resource Assessment
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
RAMS	Recreational Avoidance Mitigation Strategy
SANG	Suitable Alternative Natural Greenspace
SEND	Special Educational Need and Disabilities
SFRA	Strategic Flood Risk Assessment
SGS	Strategic Growth Site
SHELAA	Strategy Housing and Employment Land Availability Assessment
SHNA	Strategic Housing Needs Assessment
SPA	Special Policy Area
SRN	Strategic Road Network
SuDS	Sustainable Drainage Systems
SWF	South Woodham Ferrers
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest

VDS	Village Design Statement
WCS	Water Cycle Study
WRC	Water Recycling Centre

Executive Summary

This report sets out:

- Summary of the Pre-Submission (Regulation 19) consultation (Section 1)
- Summary of representations received (Section 2)
- Summary of the main issues raised in the responses received on the Pre-Submission Local Plan and a high-level summary of CCC's response to the comments made, and where relevant, how they have informed any minor modifications proposed by CCC to be submitted to the Inspector examining the Plan (Section 3).

It supersedes the Pre-Submission Regulation 19 Document Feedback Report published in July 2025.

It should be noted that since the Pre-Submission consultation the need arose to carry out a further Regulation 19 Focused Additional Sites Consultation (shortened to 'Additional Sites Consultation' throughout this document). Comments on this Additional Sites Consultation are the subject of their own You Said We Did Feedback Report.

About the Consultation

A comprehensive six-week programme of consultation took place during the formal consultation period from 10am on 4th February 2025 to 4pm on 18th March 2025. The consultation was promoted through a range of activities including email/letter notifications to more than 6,200 contacts registered on the Council's Consultation Portal, on the Council's website, adverts in local publications, site notices and social media. Consultation activities included placing consultation documents on deposit at the Council's Customer Service Centre, organised stakeholder presentations, Duty to Co-operate meetings and public exhibitions.

Summary of responses to the Pre-Submission Consultation Document

A total of 6,725 duly made comments were received to the consultation from 2,798 respondents. The respondents are from a wide variety of groups and individuals including residents, developers, landowners and their agents, businesses and statutory bodies such as other local authorities and Parish/Town Councils. All the comments received can be viewed on the Council's Consultation Portal. An overview of the main issues raised to the plan is provided below:

- A wide range of feedback was received ranging from general comments to technical observations on detailed policy wording
- Most Government agencies or national bodies support the plan outright or offer qualified support subject to some proposed amendments
- Mix of support and opposition from Town/Parish Councils, with many suggesting changes including the deletion of site allocations
- Most public comments were objecting to one or more aspects of the plan, though there was limited support

- Some developers, Parish Councils and the public challenge compliance with the Duty to Cooperate including whether all bodies have been properly engaged and neighbouring unmet housing needs properly considered
- Concerns over the evidence base/ lack of justification for some policies including net zero homes (Policy S2 and DM31), development requirements (Policy S6) and sustainable development measures in DM25
- Mix of support and opposition to the development requirements (Policy S6) and the Spatial Strategy (Policy S7)
- Concerns that the Spatial Strategy is too reliant on larger strategic sites particularly the Garden Communities, has an insufficient supply buffer, is too reliant on windfall sites, and that a sufficient range of reasonable alternatives approaches, and site options have not considered or appraised
- Concerns there are not enough small site housing allocations which does not accord with national policy requirements
- Calls for the expansion of the North-East Chelmsford Garden Community site and clarity sought over why this option is rejected
- Calls from developers for Green Belt and Green Wedge reviews to identify sustainable development opportunities in these areas
- Many detailed wording changes proposed to expand/amend policies from minor changes to the deletion of policy requirements including to some site allocation policies to ensure they are viable and deliverable
- Many objections from the development industry to policy requirements which exceed national planning policy including net zero homes (Policy S2/ DM31) and 20% biodiversity net gain (Policy S4/ DM16)
- Some question the need for policies including a strategic design policy (Policy S15 Successful Places) and specific Green Wedge policies (Policy S11 Countryside)
- Many in the development industry call for an immediate/earlier review of the plan to meet housing needs in full as soon as possible (Policy S13 Monitoring and Review)
- Many in the development industry call for the housing requirement to be increased to meet or exceed the revised Standard Method figure of 1,454 dpa outlined in the 2024 NPPF
- Broad support from the promoters of allocated sites with some requesting higher capacities, larger site areas, more flexible types of employment floorspace and policy requirement changes
- Many alternative site allocations promoted by landowners/developers at a range of site sizes and locations
- Significant levels of opposition to Hammonds Farm (SGS16a) and Junction 18 A12 Employment Area (SGS16b) for multiple reasons including traffic, landscape, flood risk, infrastructure and heritage impacts, with calls for their removal. There is also some limited support for these sites
- High level of objections to some other site allocations in particular Land at Kingsgate, Bicknacre (GS11b) and Land West of Barbrook Way, Bicknacre (GS11c) for multiple reasons including traffic, infrastructure, landscape and flood risk impacts and calls for their removal
- Many developers challenge the delivery rates of strategic site allocations in particular SGS16a, and whether a 5-year housing land supply can be achieved and maintained

- Concerns from Parish Councils and the public that some site allocations do not reflect ‘made’ Neighbourhood Plans
- Calls for changes to masterplan requirements for strategic sites and Special Policy Areas
- Requests for policy and Policy Map changes to some Special Policy Areas including ARU Writtle and Hanningfield Reservoir, and additional Special Policy Areas proposed
- Development industry concerns on how the plan will be used alongside the 2024 National Planning Policy Framework (NPPF) for decision-making
- Criticism from some Parish Councils and the public regarding the consultation including a lack of adequate engagement, inaccessible information and that the process for making comments was too complicated.

Commentary on main issues raised and CCC response

The ‘CCC response’ tables provide a high-level response to the main issues raised within the comments throughout this report. A high-level commentary on the main issues raised in the representations to the Pre-Submission plan is set out below:

Housing requirement and delivery

- There is no longer a national requirement for a supply buffer to be allocated with the risks to supply instead managed through the need to maintain a 5-year land supply and the Housing Delivery Test. A range of development quantums, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. The NPPF directs Local Planning Authorities to consider historic windfall delivery rates. The Pre-Submission Housing Topic Paper shows trends over a considerable length of time and that assumed average rates are below the actual average allowing a higher figure to be predicted. The ‘small sites’ (under 1ha) are an important part of the Plan to ensure delivery of a variety of sites in a timely manner. This is not only to be met through allocations, but also a combination of windfall sites and custom build housing.
- At the time the Pre-Submission Consultation was carried out (using the Council’s Five-Year Housing Land Supply Methodology - April 2024) the Council could demonstrate a Five-Year Housing Land Supply at the point of submission of the Plan. Following the Pre-Submission Consultation the Council’s Five-Year Housing Land Supply (based on the August 2025 Housing Site Schedule) showed that at the point of submission (Years 2 – 6) it was estimated to be 8,010 dwellings. Using the August 2025 Housing Site Schedule, it was estimated that the housing requirement figure for the Five-Year Housing Land Supply calculation would be 1,622 dwellings per annum on submission. This was based on the proposed Housing Requirement figure of 1,210 dwellings per annum, the estimated shortfall in housing completions from the new base period of the emerging Local Plan (1,672 dwellings) and the required 5% buffer to ensure choice and competition in the market for land. Based on these figures this would only be 4.93 years of housing land

supply (8,010/1,622) on submission. As a result of this the Council undertook an Additional Site Consultation which seeks to rectify this situation and demonstrate that the Local Plan will meet its Five-Year Housing Land Supply at the point of submission. Using the latest housing supply figure in the April 2026 Housing Site Schedule (8,962), and the updated housing requirement figure (including the actual shortfall of 1,783 dwellings that reflects 407 net new completions in 2025/26), the revised Five-Year Housing Land Supply Calculation including a 5% buffer is 5.45 years (8,962/1,645). The housing requirement in the plan meets at least 80% of the revised standard method housing need in line with the Government's latest plan-making transitional arrangements. This is consistent with the NPPF's objective of preparing and maintaining up to-date plans in order to make consistent provision for housing and other needs.

- Delivery rates are set out in the Local Plan Housing Trajectory and are established through the Council's Five-Year Housing Land Supply Methodology. The Trajectory is updated annually, and the Pre-Submission Local Plan used the latest available Housing Site Schedule (April 2024). Minor modifications will be proposed to the Trajectory to reflect the latest published Housing Site Schedule ahead of submission (April 2026). A number of Strategic Growth Sites rolled forward from the adopted Local Plan including greenfield sites have planning permission or resolutions to grant planning permission including North of South Woodham Ferrers, North of Broomfield and North East Chelmsford.

Site allocations

- The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process. With the inclusion of the additional sites identified in the Additional Site Consultation the development requirements can be met within the Local Plan without needing to undertake a Green Belt review. This approach accords with National Planning Guidance, the adopted Local Plan, and the evidence base.
- Further expansion of North East Chelmsford (Chelmsford Garden Community - Location 6) was discounted following the Issues and Options consultation as promoted development sites were found to not be deliverable within the plan period given permitted mineral extraction and land remediation works.
- The site allocations for Hammonds Farm (SGS16a) and Junction 18 A12 Employment Area (SGS16b) are supported by the plan evidence base. All Highways modelling to support the Local Plan has been carried out at a strategic level, considering all proposed growth in the adopted Local Plan, background growth to 2041, neighbouring authorities' growth, and all newly proposed development sites.
- Impacts on the historic environment and landscape will be minimised through the masterplanning and mitigation strategies. The flood risk assessment shows that development would be directed to the areas at lowest risk of flooding. A wide range of site infrastructure is proposed through the requirements of the policy.

- The site allocations for Land at Kingsgate, Bicknacre (GS11b) and Land West of Barbrook Way, Bicknacre (GS11c) are supported by the plan evidence base including a Strategic Flood Risk Assessment, Landscape Sensitivity, Archaeology Assessment and Capacity Study, Heritage Impact Assessment, and traffic modelling. The Small Sites Planning Briefs/Concept Framework 2024 (appended to the Submission Spatial Strategy and Strategic Sites Topic Paper) considers that there are no overriding site constraints which mean that the sites are unsuitable or undeliverable.
- Special Policy Areas (SPAs) are defined within and around existing facilities and institutions to enable their operational and functional requirements to be planned in a strategic and phased manner. SPA6 at Writtle includes an area of open space which should remain unchanged. The requirement for Hanningfield Reservoir SPA to show a demonstrable need for any future proposals in the Green Belt is also unchanged. New SPAs are not considered appropriate as they can be decided against other policies.
- Site allocations are strategic matters for the Local Plan, but where applicable the made Neighbourhood Plans include detailed design and other guidance which can influence future detailed development proposals and planning applications.

General policy matters

- Policies such as S15 Successful Places and specific Green Wedge policies are included as they address and provide more detail for locally important issues which are not explicitly covered by the NPPF.
- Many objections from the development industry to policy requirements which exceed national planning policy including net zero homes (Policy S2/ DM31) and 20% biodiversity net gain (Policy S4/ DM16). These policy requirements are supported by the plan evidence base. The ‘net zero’ evidence base developed for Greater Essex, which supports the plan, demonstrates that the policy requirements are technically feasible to deliver and at reasonable cost, and legally sound for local authorities to set higher standards. A similar policy, based on the same Essex-wide ‘model policy’, has recently been found sound through Uttlesford District Council’s Local Plan examination.
- There is no reason for CCC to commit to an update of the Local Plan earlier than the timeframe set out in Policy S13, which is also set out in Paragraph 34 of the NPPF (2024). The Local Plan is being examined against the 2023 version of the NPPF, to meet the transitional arrangements set out in Annex 1 of the 2024 NPPF, specifically Para 234 a.
- The Council’s Masterplan Procedure (October 2025) has been updated to cover three Masterplan routes, including planning/site briefs for smaller, less constrained sites. Site policies will be updated to reflect the relevant route for each site but the continued requirement for Masterplans for strategic sites and Special Policy Areas will ensure that they satisfy the requirements of their respective plan policies. This can include delivery of all necessary infrastructure and ensuring that new development is delivered as part of a cohesive approach.

Duty to Co-operate and Consultation

- Key bodies were consulted on strategic matters, including Essex County Council, adjoining local authorities, Historic England, Natural England, and the Environment Agency. A total of 153 of these bodies responded to the consultation. Although the formal Duty to Co-operate has now been removed, the Council has co-operated with a range of bodies on strategic planning matters on an on-going basis as evidenced in the Duty to Co-operate Position Statements (evidence base documents DTC001, DTC002 and DTC005), and Statements of Common Ground including those with adjoining authorities who asked for their unmet needs to be considered. A Statement of Co-operation will be published to accompany the Local Plan Submission.
- The consultation exceeded requirements set out in legislation and the Council's Statement of Community Involvement. A full schedule of engagement activity is included in Section 1 of this report, and included direct notification, events, and publications which are included in Appendix 1. In addition, detailed step-by-step guidance for using the consultation portal was published specifically to guide users on how to make comments on the consultation events.

Next Steps

It should be noted that since the Pre-Submission consultation the need arose to carry out a further Regulation 19 Focused Additional Sites consultation. Comments on this Additional Sites Consultation are the subject of their own You Said We Did Feedback Report.

This report and the subsequent Additional Sites 'You Said We Did' Feedback Report will be presented in the Regulation 22 Consultation Statement which will accompany the plan when submitted for Examination.

Introduction

The Pre-Submission consultation represented the third formal stage in the preparation of the Review of the Adopted Chelmsford Local Plan. The consultation document set out the spatial strategy for new homes and jobs for the future growth and development of the city up to 2041. It also contained updated and new policies which would be used to determine planning applications.

The consultation was undertaken in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and was preceded by an Issues and Options consultation in 2022 and Preferred Options consultation in 2024 both undertaken in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Purpose of this 'You Said We Did' Report

This report sets out the consultation feedback received on the Pre-Submission document from a wide variety of groups and individuals including:

- Residents
- Developers/landowners and their agents
- Businesses
- Statutory bodies such as local authorities, Parish/Town Councils and utilities.

This report is constructed in four parts:

- An Executive Summary includes an overview of the main issues and a commentary on them
- Section 1 provides a summary of the consultation undertaken
- Section 2 gives a summary of the representations received
- Section 3 provides a summary of the main issues raised in the responses received on the Pre-Submission Local Plan and a high-level summary of CCC's response to the comments made, and where relevant, how they have informed any minor modifications proposed by CCC to be submitted to the Inspector examining the Plan. The report is set out in the Pre-Submission document order and therefore the policy numbers may not be in numerical sequence.

This report supersedes the Pre-Submission Regulation 19 Document Feedback Report published in July 2025.

Section 1: Summary of Consultation Undertaken

A comprehensive six-week programme of consultation took place during the formal consultation period from 10am on 4th February 2025 to 4pm on 18th March 2025.

This programme of consultation followed (and exceeded) the requirements set out in legislation, and the commitments in the Council's adopted Statement of Community Involvement (September 2020).

The documents published for consultation on 4th February were:

- Pre-Submission (Regulation 19) Local Plan Consultation Document; and
- Pre-Submission Integrated Impact Assessment (subject of a separate Feedback Report).

These documents were placed on deposit at CCC Customer Service Centre, with electronic versions available to view at most Parish/Town Council offices and local libraries across Chelmsford.

The Council notified more than 6,200 contacts registered on its Consultation Portal. These included the public, statutory agencies such as Essex County Council and Town/Parish Councils, utility companies, businesses, interest groups, and voluntary and community bodies. Council Members and staff were also notified.

A number of consultation events were arranged:

- Three staffed exhibitions, visited by 41 attendees
- 16 days of unstaffed exhibitions
- Four pop-up displays for the whole consultation period
- Five targeted presentations including a Parish/Town Council Forum, Agent/Developers Forum and Local Authority Duty to Co-operate meeting
- A bespoke Local Plan video, attracting 1,100 views since its launch in 2024.

Printed/online materials and advertisements were produced as follows:

- Web page with the consultation documents and links to supporting information including the exhibition panels, attracting 6,400 visits
- Advertisement in a local newspaper (Essex Chronicle), and The City Times and South Woodham Focus (independent community magazines)
- Information packs for all of Chelmsford's 29 Parish/Town Councils
- Six City Life emails via e-shot to approx.10,600 recipients and business bulletin to 5,100 recipients, linking to two City Life news website articles and/or Local Plan webpage
- 25 social media posts/stories/feeds/adverts seen by nearly 50,000 contacts and viewed over 100,000 times
- 140 posters distributed to Parish/Town Councils, CCC offices and leisure facilities, post offices, doctors' surgeries, churches and local shops
- Summary newsletters available at public exhibitions and on request
- 147 site notices placed around 15 proposed new site allocations
- 30 digital screens at CCC venues
- 7 digital screens at bus stops
- Staff e-mail banner and website banner.

A list of organisations consulted, and copies of key consultation materials are given in Appendix 1.

Integrated Impact Assessment of the review of the Adopted Local Plan: Preferred Options Consultation

The Local Plan Integrated Impact Assessment (IIA) was also subject to consultation at the same time. The IIA brings various strands of assessment together, consisting of the Sustainability Appraisal, Strategic Environmental Assessment, Habitats Regulations Assessment, Health Impact Assessment, and Equalities Impact Assessment. Feedback on this document is summarised in a separate report prepared by the Council's IIA Consultants.

Call for Sites and Strategy Housing and Employment Land Availability Assessment (SHELAA)

In addition to the Local Plan and IIA consultations, the Council undertook a Call for Sites to identify available land for consideration for future development. Four new submissions and four amendments to existing sites were submitted through this process. These have been assessed in an updated Strategic Housing and Employment Land Availability Assessment (SHELAA).

Section 2: Summary of Representations Received

For this report, people and organisations who made a comment to the consultation are called ‘respondents’.

Methodology

Respondents had a choice of ways to make their comments, by:

- Answering questions included in a complete version of the consultation document published on the consultation portal
- Answering questions using a stand-alone online questionnaire published on the consultation portal
- Sending written comments in an e-mail
- Sending written comments by post.

The consultation questions focused on whether the Council had met the legal requirements (including the Duty to Co-operate, required at that stage) and whether the plan meets the tests of soundness set out in the National Policy Planning Framework – that it is positively prepared, justified, effective and consistent with national policy.

Whichever method respondents used; all comments have been entered into the Council’s Consultation Portal.

Where respondents did not state which paragraph/section/policy or site they were commenting on, officers have assigned responses to the most relevant part of the Local Plan.

If questions were not answered by a consultee selecting a box, the Council has not sought to tick any boxes to avoid any misrepresentation.

The questions for both online methods of response were identical and have been combined for this report.

To ensure proper consideration of issues, respondents have been divided into types depending on their interface with the Council. Some fall into more than one category, so totals may exceed the overall number of respondents. Similarly, some respondents made their comments via more than one method so the totals for how comments were made is greater than the total number of comments received.

The assessment of responses is high level and focuses on the main issues raised, rather than the number of representations to any individual question. Where many people have made a similar main issue, these have been summarised as one main issue.

Overview of responses

A total of **6,725 comments** were received to the consultation from **2,798 respondents**. The vast majority (5,703 comments or 85%) of these were directed to proposed Strategic Sites 16a (Hammonds Farm) and 16b (Employment site adjacent

to J18 of A12) almost all of which are residents objecting to the inclusion of the sites in the Local Plan.

Comments by respondent type:

Type of Respondent	Explanation	Number of Respondents
Duty to Co-operate (DTC) bodies	Key bodies consulted on strategic matters, including Essex County Council, adjoining local authorities, Historic England, Natural England, Environment Agency	153
Specific bodies/groups	Parish/Town Councils, utility bodies, health and transport consultees etc	270
General and Other bodies/groups	Voluntary groups, religious groups, housing providers, businesses etc	208
Developers/landowners	Landowners, promoters of land and their agents	647
Public	Individual members of the public	5,838

How people made their comments:

Method of making comments	Number of Comments	Percentage (rounded)
Online Consultation Portal	413	6%
E-mail	6,257	93%
Letter	55	1%

The number of representations made to each question are shown in the tables below. These record where people selected an option, and/or where they made a written comment. The figure in brackets represents the percentage of total representations. It should be noted that the number of responses received to each question will not amount to the totals set out above as people did not have to answer every question.

Question 1: Do you consider the Local Plan legally compliant in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012?	
	Reps received
Yes	323 (5%)
No	5,132 (76%)
No Response	1,271 (19%)
Question 1: Please provide an explanation below	
Response	5,225 (78%)
No Response	1,500 (22%)
Question 1a: Please set out the modifications you consider necessary to make the Local Plan legally compliant including revised wording of any policy or text.	
Response	100 (1.5%)
No Response	6,625 (98.5%)

Question 2: Does the Local Plan comply with the Duty to Co-operate?	
	Reps received
Yes	286 (4%)
No	5,183 (77%)
No Response	1,256 (19%)
Question 2: Please provide an explanation below	
Response	5,251 (78%)
No Response	1,474 (22%)
Question 2a: Please outline any changes to the approach taken which you consider necessary to ensure the Duty to Co-operate is met.	
Response	100 (1.5%)
No Response	6,625 (98.5%)

Question 3: Do you consider the Local Plan 'sound'?	
	Reps received
Yes	174 (2.5%)
No	6,056 (90%)
No Response	498 (7.5%)
Question 3: If no this is because you consider the Local Plan is NOT:	
Positively Prepared	213 (3%)
Justified	359 (5%)
Effective	275 (4%)
Consistent with National Policy	291 (4%)
No Response	6,204 (92%)
Question 3a: Please provide an explanation below and identify the main issues.	
Response	6,595 (98%)
No Response	130 (2%)
Question 3b: Please set out the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text.	
Response	506 (7.5%)
No Response	6,219 (92.5%)

Question 4: If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?	
	Reps received
Yes	360 (5%)
No	188 (3%)
No Response	6,177 (92%)

Question 6: Do you wish to be notified of the following:	
	Reps received
Submission of the Local Plan for Examination	502 (7.5%)
Publication of the Inspector's Report	500 (7.5%)
Adoption of the Local Plan	500 (7.5%)
No Response	6,220 (92%)

*Note that these percentages will not all total 100% as respondents were able to tick as many options as they felt applicable.

A small number of representations were received after the closing date. Those that were received by email within two hours of the closing time (i.e. by 6pm on 18th March 2025) were deemed 'duly made' to allow for any potential delays in emails reaching the Council's mailbox. These have been analysed and included in the figures in this report. Others received after 6pm were deemed not 'duly made'.

29 of the representations were partly 'inadmissible' due to their content, so the comments have been included but with the inadmissible part redacted. An additional 3 representations had no address details and were not accepted.

A significant number of representations were received by email from 'Say no to Hammonds Farm' - a coalition of Councillors from Boreham, Sandon, Danbury and Little Baddow Parish Councils, expressing opposition to new development at Strategic Growth Sites 16a Chelmsford East Garden Community and 16b Land Adjacent to A12 Junction 18 Employment Area.

All the comments received can be viewed in full on the Council's planning policy consultation portal.

When viewing the portal, you will see the list of recent consultation events. Events which are open for consultation show a green timeline and the word 'open'. Those which are closed show a red timeline and the word 'closed'.

To view comments, you need to:

- Choose the event you would like to view comments for
- Select 'learn more' to open the event page
- Click on the 'what people say' tab to display a list of all the comments.

You can read all comments, or sort by name or date we received them. Where additional information such as reports or maps were submitted with a comment, these are listed at the end of the comment in PDF format and can be viewed or downloaded.

Responses to Pre-Submission consultation included in the complete version of the full document are prefixed PS25. Responses to the stand-alone questionnaire are prefixed PSQ25. You can find out more about using the consultation portal in our guidance notes.

Section 3: Summary of the main issues raised and CCC response

This section contains a high-level summary of the main issues and changes requested in the Pre-Submission Local Plan document order.

It specifies who has made comments from public sector bodies, infrastructure or service providers and developers/landowners in brackets at the end of relevant bullet points in the 'Summary of Representations' text. This is because it is useful to understand the nature of respondents, particularly where a stakeholder has a legal duty or responsibility over a matter that they are making comments about. It does not specify who has made comments from members of the public as to do so would result in a very long report, so bullet points from the public do not a have brackets.

It should be noted that in some cases, members of the public raised similar points to stakeholders. This is especially the case in relation to comments made by Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group to Strategic Growth Sites 16a (Hammonds Farm) and 16b (Junction 18 of the A12) which have been replicated and amplified by many individuals. To avoid duplication, these comments have not been repeated in the public comments. However, this does not affect the consultation process as this report focuses on the main issues received rather than the number of representations to any individual section of the plan.

Where respondents made the same Duty to Cooperate comments in multiple representations we have sought to report the main issues raised against the Introduction so they can be read together and to avoid duplication. We have also reported the main issues against the most relevant part of the Local Plan.

It is important to note that this report does not summarise every representation or identify every individual detailed issue, as the purpose is to identify main issues and requested changes.

Following the summary of main issues and changes requested for each Consultation Point a 'CCC Response' table provides a high-level summary of CCC's response to the comments made, and where relevant, how they have informed any minor modifications proposed by CCC to be submitted to the Inspector examining the Plan. This includes details of the key changes proposed to be made and suggestions not taken forward and why. Similarly, the 'CCC response' tables do not provide a response to each individual comment.

The Council commissioned Essex Highways to review and consider the key issues raised in the highway and transportation responses received to the consultation. This report entitled Local Plan Pre-Submission - Response to Representations (September 2025) is given in Appendix 2 and includes a review and focused response to representations received relating to the transport modelling evidence base. This has been used by CCC to understand and respond to matters of concern raised in this You Said We Did report and to inform any proposed modifications to the Pre-Submission Local Plan.

It should be noted that since the Pre-Submission consultation the need arose to carry out a further Regulation 19 Focused Additional Sites consultation. Comments on this Additional Sites Consultation are the subject of their own You Said We Did Feedback Report.

Summary of main issues raised to the Pre-Submission Plan

All the comments received can be viewed in full on the Council's Consultation Portal. A high-level commentary on the main issues raised in the representations to the Pre-Submission plan is set out below.

- A wide range of feedback was received ranging from general comments to technical observations on detailed policy wording
- Most Government agencies or national bodies support the plan outright or offer qualified support subject to some proposed amendments
- Mix of support and opposition from Town/Parish Councils, with many suggesting changes including the deletion of site allocations
- Most public comments were objecting to one or more aspects of the plan, though there was limited support
- Some developers, Parish Councils and the public challenge compliance with the Duty to Cooperate including whether all bodies have been properly engaged and neighbouring unmet housing needs properly considered
- Concerns over the evidence base/ lack of justification for some policies including net zero homes (Policy S2 and DM31), development requirements (Policy S6) and sustainable development measures in DM25
- Mix of support and opposition to the development requirements (Policy S6) and the Spatial Strategy (Policy S7)
- Concerns that the Spatial Strategy is too reliant on larger strategic sites particularly the Garden Communities, has an insufficient supply buffer, is too reliant on windfall sites, and that a sufficient range of reasonable alternatives approaches, and site options have not considered or appraised
- Concerns there are not enough small site housing allocations which does not accord with national policy requirements
- Calls for the expansion of the North-East Chelmsford Garden Community site and clarity sought over why this option is rejected
- Calls from developers for Green Belt and Green Wedge reviews to identify sustainable development opportunities in these areas
- Many detailed wording changes proposed to expand/amend policies from minor changes to the deletion of policy requirements including to some site allocation policies to ensure they are viable and deliverable
- Many objections from the development industry to policy requirements which exceed national planning policy including net zero homes (Policy S2/ DM31) and 20% biodiversity net gain (Policy S4/ DM16)
- Some question the need for policies including a strategic design policy (Policy S15 Successful Places) and specific Green Wedge policies (Policy S11 Countryside)
- Many in the development industry call for an immediate/earlier review of the plan to meet housing needs in full as soon as possible (Policy S13 Monitoring and Review)

- Many in the development industry call for the housing requirement to be increased to meet or exceed the revised Standard Method figure of 1,454 dpa outlined in the 2024 NPPF
- Broad support from the promoters of allocated sites with some requesting higher capacities, larger site areas, more flexible types of employment floorspace and policy requirement changes
- Many alternative site allocations promoted by landowners/developers at a range of site sizes and locations
- Significant levels of opposition to Hammonds Farm (SGS16a) and Junction 18 A12 Employment Area (SGS16b) for multiple reasons including traffic, landscape, flood risk, infrastructure and heritage impacts, with calls for their removal. There is also some limited support for these sites
- High level of objections to some other site allocations in particular Land at Kingsgate, Bicknacre (GS11b) and Land West of Barbrook Way, Bicknacre (GS11c) for multiple reasons including traffic, infrastructure, landscape and flood risk impacts and calls for their removal
- Many developers challenge the delivery rates of strategic site allocations in particular SGS16a, and whether a 5-year housing land supply can be achieved and maintained
- Concerns from Parish Councils and the public that some site allocations do not reflect 'made' Neighbourhood Plans
- Calls for changes to masterplan requirements for strategic sites and Special Policy Areas
- Requests for policy and Policy Map changes to some Special Policy Areas including ARU Writtle and Hanningfield Reservoir, and additional Special Policy Areas proposed
- Development industry concerns on how the plan will be used alongside the 2024 National Planning Policy Framework (NPPF) for decision-making
- Criticism from some Parish Councils and the public regarding the consultation including a lack of adequate engagement, inaccessible information and that the process for making comments was too complicated.

Summary of CCC response to main issues raised to the Pre-Submission Plan

The 'CCC response' tables in this section provide a high-level response to the main issues raised within the comments throughout this report. A high-level CCC response to the main issues raised in the representations to the Pre-Submission plan is set out below:

Housing requirement and delivery

- There is no longer a national requirement for a supply buffer to be allocated with the risks to supply instead managed through the need to maintain a 5-year land supply and the Housing Delivery Test. A range of development quantums, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. The NPPF directs Local Planning Authorities to consider historic windfall delivery rates. The Pre-Submission Housing Topic Paper

shows trends over a considerable length of time and that assumed average rates are below the actual average allowing a higher figure to be predicted. The ‘small sites’ (under 1ha) are an important part of the Plan to ensure delivery of a variety of sites in a timely manner. This is not only to be met through allocations, but also a combination of windfall sites and custom build housing.

- At the time the Pre-Submission Consultation was carried out (using the Council’s Five-Year Housing Land Supply Methodology - April 2024) the Council could demonstrate a Five-Year Housing Land Supply at the point of submission of the Plan. Following the Pre-Submission Consultation the Council’s Five-Year Housing Land Supply (based on the August 2025 Housing Site Schedule) showed that at the point of submission (Years 2 – 6) it was estimated to be 8,010 dwellings. Using the August 2025 Housing Site Schedule, it was estimated that the housing requirement figure for the Five-Year Housing Land Supply calculation would be 1,622 dwellings per annum on submission. This was based on the proposed Housing Requirement figure of 1,210 dwellings per annum, the estimated shortfall in housing completions from the new base period of the emerging Local Plan (1,672 dwellings) and the required 5% buffer to ensure choice and competition in the market for land. Based on these figures this would only be 4.93 years of housing land supply (8,010/1,622) on submission. As a result of this the Council undertook an Additional Site Consultation which seeks to rectify this situation and demonstrate that the Local Plan will meet its Five-Year Housing Land Supply at the point of submission. Using the latest housing supply figure in the April 2026 Housing Site Schedule (8,962), and the updated housing requirement figure (including the actual shortfall of 1,783 dwellings that reflects 407 net new completions in 2025/26), the revised Five-Year Housing Land Supply Calculation including a 5% buffer is 5.45 years (8,962/1,645). The housing requirement in the plan meets at least 80% of the revised standard method housing need in line with the Government’s latest plan-making transitional arrangements. This is consistent with the NPPF’s objective of preparing and maintaining up to-date plans in order to make consistent provision for housing and other needs.
- Delivery rates are set out in the Local Plan Housing Trajectory and are established through the Council’s Five-Year Housing Land Supply Methodology. The Trajectory is updated annually, and the Pre-Submission Local Plan used the latest available Housing Site Schedule (April 2024). Minor modifications will be proposed to the Trajectory to reflect the latest published Housing Site Schedule ahead of submission (April 2026). A number of Strategic Growth Sites rolled forward from the adopted Local Plan including greenfield sites have planning permission or resolutions to grant planning permission including North of South Woodham Ferrers, North of Broomfield and North East Chelmsford.

Site allocations

- The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process. With the

inclusion of the additional sites identified in the Additional Site Consultation the development requirements can be met within the Local Plan without needing to undertake a Green Belt review. This approach accords with National Planning Guidance, the adopted Local Plan, and the evidence base.

- Further expansion of North East Chelmsford (Chelmsford Garden Community - Location 6) was discounted following the Issues and Options consultation as promoted development sites were found to not be deliverable within the plan period given permitted mineral extraction and land remediation works.
- The site allocations for Hammonds Farm (SGS16a) and Junction 18 A12 Employment Area (SGS16b) are supported by the plan evidence base. All Highways modelling to support the Local Plan has been carried out at a strategic level, considering all proposed growth in the adopted Local Plan, background growth to 2041, neighbouring authorities' growth, and all newly proposed development sites.
- Impacts on the historic environment and landscape will be minimised through the masterplanning and mitigation strategies. The flood risk assessment shows that development would be directed to the areas at lowest risk of flooding. A wide range of site infrastructure is proposed through the requirements of the policy.
- The site allocations for Land at Kingsgate, Bicknacre (GS11b) and Land West of Barbrook Way, Bicknacre (GS11c) are supported by the plan evidence base including a Strategic Flood Risk Assessment, Landscape Sensitivity, Archaeology Assessment and Capacity Study, Heritage Impact Assessment, and traffic modelling. The Small Sites Planning Briefs/Concept Framework 2024 (appended to the Submission Spatial Strategy and Strategic Sites Topic Paper) considers that there are no overriding site constraints which mean that the sites are unsuitable or undeliverable.
- Special Policy Areas (SPAs) are defined within and around existing facilities and institutions to enable their operational and functional requirements to be planned in a strategic and phased manner. SPA6 at Writtle includes an area of open space which should remain unchanged. The requirement for Hanningfield Reservoir SPA to show a demonstrable need for any future proposals in the Green Belt is also unchanged. New SPAs are not considered appropriate as they can be decided against other policies.
- Site allocations are strategic matters for the Local Plan, but where applicable the made Neighbourhood Plans include detailed design and other guidance which can influence future detailed development proposals and planning applications.

General policy matters

- Policies such as S15 Successful Places and specific Green Wedge policies are included as they address and provide more detail for locally important issues which are not explicitly covered by the NPPF.
- Many objections from the development industry to policy requirements which exceed national planning policy including net zero homes (Policy S2/ DM31) and 20% biodiversity net gain (Policy S4/ DM16). These policy requirements are supported by the plan evidence base. The 'net zero' evidence base developed for Greater Essex, which supports the plan, demonstrates that the policy requirements are technically feasible to deliver and at reasonable cost,

and legally sound for local authorities to set higher standards. A similar policy, based on the same Essex-wide 'model policy', has recently been found sound through Uttlesford District Council's Local Plan examination.

- There is no reason for CCC to commit to an update of the Local Plan earlier than the timeframe set out in Policy S13, which is also set out in Paragraph 34 of the NPPF (2024). The Local Plan is being examined against the 2023 version of the NPPF, to meet the transitional arrangements set out in Annex 1 of the 2024 NPPF, specifically Para 234 a.
- The Council's Masterplan Procedure (October 2025) has been updated to cover three Masterplan routes, including planning/site briefs for smaller, less constrained sites. Site policies will be updated to reflect the relevant route for each site but the continued requirement for Masterplans for strategic sites and Special Policy Areas will ensure that they satisfy the requirements of their respective plan policies. This can include delivery of all necessary infrastructure and ensuring that new development is delivered as part of a cohesive approach.

Duty to Co-operate and Consultation

- Key bodies were consulted on strategic matters, including Essex County Council, adjoining local authorities, Historic England, Natural England, and the Environment Agency. A total of 153 of these bodies responded to the consultation. Although the formal Duty to Co-operate has now been removed, the Council has co-operated with a range of bodies on strategic planning matters on an on-going basis as evidenced in the Duty to Co-operate Position Statements (evidence base documents DTC001, DTC002 and DTC005), and Statements of Common Ground including those with adjoining authorities who asked for their unmet needs to be considered. A Statement of Co-operation will be published to accompany the Local Plan Submission.
- The consultation exceeded requirements set out in legislation and the Council's Statement of Community Involvement. A full schedule of engagement activity is included in Section 1 of this report, and included direct notification, events, and publications which are included in Appendix 1. In addition, detailed step-by-step guidance for using the consultation portal was published specifically to guide users on how to make comments on the consultation events.

Introduction

Consultation point	Total number of responses
Introduction	22

Summary of Representations – main issues and suggested modifications:

- Welcome the ongoing engagement with Historic England and the plan. Acknowledge the work to prepare the Heritage Impact Assessments and integrating their recommendations into the plan (Historic England PSQ25-5798 & 5800)

- Consider the plan ‘sound’ regarding the aspects relevant to our natural environment remit (Natural England PSQ25-6239)
- The Council has complied with the relevant regulations regards its duties to the Integrated Care Board as a statutory consultee (Integrated Care Board PSQ25-5122)
- Welcome the plan’s approach to health and wellbeing and is satisfied that it suitably addresses both creating healthy communities and securing healthcare infrastructure (Integrated Care Board PSQ25-5122)
- Duty to Co-operate requirements have been met. The Council is encouraged to continue to positively and constructively engage on strategic cross-boundary issues particularly in the context of infrastructure (Brentwood Borough Council PSQ25-6159, Rochford District Council PSQ25-6194)
- The Council has complied with its duty to cooperate with regards the county council’s statutory responsibilities. The plan and its evidence base reflect our active involvement throughout the plan preparation and ensures that ECC’s infrastructure and services are identified and can be delivered (Essex County Council PS25-181)
- Support for the Council’s decision to review their Local Plan and welcomes the clarity on its draft proposals (Uttlesford District Council PSQ25-5263)
- Significant cross-boundary engagement has taken place throughout the preparation of the plan, effectively addressing the requirements of Duty to Co-operate (Brentwood Borough Council PSQ25-6157)
- The Local Plan appears to be legally compliant and to align with the Duty to Cooperate (Chelmsford Garden Community Consortium PSQ25-6531, Vistry Group PSQ25-6373)
- Council must justify/do more to justify how they have considered the unmet housing needs of Basildon, Castle Point and/or Southend-on-Sea Councils including evidence of Duty to Cooperate engagement (Redrow Barratt PSQ25-5165, Obsidian Strategic Asset Management Ltd PSQ25-5667)
- Additional work is required to show that the Duty to Cooperate has been complied with following requests to help meet unmet needs from neighbouring Councils. The Duty to Cooperate evidence base is contradictory in this respect. The Plan should also consider unmet needs arising in London (Richborough PS25-165, PS25-177)
- Concern if the Council can demonstrate compliance with the duty to co-operate in relation to meeting unmet housing needs of other authorities despite formal requests, where it should be seeking to plan positively to assist them (Gladman Developments Ltd PSQ25-6316, PSQ25-6317, PSQ25-6309)
- The Statements of Common Ground fail to demonstrate adequate and meaningful engagement with neighbouring authorities on potential unmet needs, including Rochford, Castle Point, and Southend (A.G. & P.W.H. Speakman PSQ25-3043, Weal Properties Ltd PSQ25-3073, Mrs R Armstrong and Mr B Howard Ms Becky Armstrong PSQ25-3079, PSQ25-3038)
- Broad support for the preferred approach which moves Chelmsford further towards the new vision of a greener, more connected district (Broomfield Parish Council PSQ25-5149)
- Para 1.30 - request that the Council updates their Duty to Cooperate Statement and Statement of Common Ground prior to submission (Essex County Council PS25-182)

- The Plan needs to accommodate the 20% shortfall in the housing numbers arising from use of the transitional arrangements and identify safeguarded land from the Green Belt for growth beyond this Plan Period (Croudace Homes PSQ25-6053)
  Additional work is required to show that the Duty to Cooperate has been complied with (Home Builders Federation PSQ25-5471) including requests to help meet unmet needs from neighbouring Councils. The Plan should also consider unmet needs arising in London (Richborough PS25-173, PS25-167, PS25-170, PS25-174)
- General support the approach to growth but inadequate justification to not meet (at least some of) the unmet need of neighbouring councils. Expand SGS3 to assist with early delivery in the Plan period and in meeting the unmet need of Chelmsford and neighbouring authorities (Barratt Redrow PSQ25-5164)
- The Council must demonstrate how they have sought to engage with neighbouring authorities regards their unmet needs. The average annual completion rate has been considerably below the local housing needs figure of 1,210 since 2013. Plan should be meeting the full assessed need, as required by the NPPF and to significantly boost the supply of homes (Obsidian Strategic Asset Management Ltd PSQ25-5704)
- The consultation documents are complicated and difficult to navigate (Woodham Walter Parish Council PSQ25-5836)
- There are inconsistencies between satisfying the NPPF transitional arrangement for plan-making and those relating to decision-taking requiring an early review of the plan (Rosehart Properties Ltd PSQ-3144)
- The time frame from submission to adoption is unlikely to be achievable – extend the plan period to ensure it is 15 years (Martin Grant Homes PSQ25-2603, Greystoke CB PSQ25-6070)
- Plan is unsound. There is no direct evidence of engagement councils in South Essex to understand if they have any unmet needs (House Builders Federation PSQ25-5469)
- The plan should state when engagement with neighbouring authorities will take place and when and how the results of this will be made available to residents
- This plan should be put on hold until a new unitary authority has been created so that a plan will work for the new authority.

CCC Response
The Council has worked with statutory bodies to produce/update Statements of Common Ground for submission alongside the Local Plan.
The consultation exceeded requirements set out in legislation and the Council's Statement of Community Involvement.
The Council will follow the timeline in its latest Local Development Scheme (October 2025). This anticipates adoption in 2026 providing a plan period of around 15 years.
Request for continued co-operation and engagement is welcomed.
The Council has co-operated with other bodies on strategic planning matters on an on-going basis as evidenced in the Duty to Co-operate Position Statements

(evidence base documents DTC001, DTC002 and DTC005), and Statements of Common Ground.
National planning policy requires Councils to maintain an up to date Local Plan.

About Chelmsford

Consultation point	Total number of responses
About Chelmsford	10

Summary of Representations – main issues and requested changes:

- New green and blue infrastructure should be in accordance with Natural England's Green Infrastructure Framework – Principles and Standards for England (Essex Wildlife Trust PSQ25-5056)
- The Key Strategic Objectives at para 2.14 should also refer to the natural environment (Natural England PSQ25-6240, Essex Wildlife Trust PSQ25-5056)
- Update Figure 11 to list all 'outstanding' performing schools (Essex County Council PS25-185)
- Para 2.29 - the description of ARU is underplayed and should mention of its alliance with Cambridge and its campus there (J & T Wardrop and the Wardrop Trust PS25-104)
- Engage with Essex Police to ensure safe and secure communities for current and future residents (Essex Police PSQ25-2650)
- The Green Belt skews the development of Chelmsford towards damaging the arguably more important landscapes to the north and east of Chelmsford. Agree that flood control is important (Chelmsford Rivers and Canal Link group PS25-273)
- Figure 5 does not mention commuters from the North West corridors such as Cambridge.

CCC Response
Strategic Priority 3 already includes protection, management and enhancement of multifunctional green/blue infrastructure networks in line with Natural England's Green Infrastructure Framework.
Paragraph 2.14 contains objectives from an adopted Joint Plan between Colchester, Braintree and Tendring and cannot by amended by the Council. The commitment to the natural environment is set out in Strategic Priorities 1 and 3 and Policies S4 and DM16.
Para 2.39 references partners in the private and public sector.
Figure 5 illustrates the most popular destinations for Chelmsford residents and where the majority of Chelmsford's workforce comes from. This reflects the functional economic geography which Chelmsford shares with Braintree, Maldon and Colchester districts.
Minor modifications will be proposed to Figure 11 to expand list to include all 'outstanding' performing schools.

What are our Strategic Priorities

Consultation point	Total number of responses
What are our Strategic Priorities	46

Summary of Representations – main issues and requested changes:

- Support for all nine strategic priorities (Dominus Chelmsford PSQ25-6200, Croudace Homes PS25-350).

Strategic Priority 1

- Support for Strategic Priority 1 (Essex Wildlife Trust PSQ25-5057, Dandara PSQ25-6271, Sport England PS25-72)
- Welcome the reference relating to stand-alone renewable generation (Infrabee PSQ25-5731)
- Welcome the reference to nature-based solutions and the Essex Local Nature Recovery Strategy (Natural England PSQ25-6241)
- Recommend the use of Secured by Design (SBD) Police Preferred Security Products, which support sustainability agendas and last longer (Essex Police PSQ25-2651)
- Allocating a stand-alone new settlement at Hammonds Farm does not achieve the objective to allocate development in the most sustainable locations (Dandara PSQ25-6008)
- The current approach to defining sustainable locations for development based on settlement boundaries is overly reliant on arbitrary boundaries and a flexible greener outlook could be adopted i.e. walking distance to key services (Mrs Helen Sadler, PS25-32)
- This section seems to rely very heavily on planting trees and related activities with very little attention to care of the watercourses (Chelmsford Rivers and Canal Link group PS25-274)
- Requirements will be challenging for the developers; there are some very worthy, but very limited policies of how these challenges will be met for existing infrastructure without any plan or timescales of how this be achieved.

Strategic Priority 2

- Support for consideration of development layouts which create walkable communities (Sport England PS25-73)
- Recommend engagement to ensure new walking and cycling routes are designed to deter the fear of crime, and in new and existing public realm and green spaces so that women and girls feel included and comfortable (Essex Police PSQ25-2651)
- Consideration should be given to: Home Office strategy of reducing ‘Violence Against Women and Girls’; Safer Parks Executive Summary (greenflagaward.org) (Essex Police PSQ25-2651)

- The draft Plan does not prioritise development in already sustainable locations, such as a promoted site off Galleywood Road, Great Baddow (Obsidian PSQ25-5932), or North-West Chelmsford (Dandara PSQ25-6009)
- It is important that the Local Plan allocates homes in locations which are already accessible by these modes of transport (Dandara PSQ25-6278).

Strategic Priority 3

- Support for the protection of national and locally designated sites, wildlife habitats, and multi-functional green-blue infrastructure (Natural England PSQ25-6454)
- Local Plans should ensure that land of the least environmental value is allocated for development, with a mitigation hierarchy which informs opportunities for enhancement and to maintain connectivity through local ecological networks/wider Nature Recovery Network; and take into account the principles set out in the Nature Recovery Handbook and respond to the Essex LNRS (Essex Wildlife Trust PSQ25-5058)
- Agree that these enhancement measures should be incorporated into the layout of developments wherever possible (Dandara PSQ25-6280)
- It is imperative that the ongoing use of the allotment site at Princes Road, Chelmsford should be maintained, and any future change of use (due to potential sale of land) of should be resisted. Any change of use would increase the area's allotments deficit. It is a green space and wildlife corridor, allotment gardening promotes healthy living, and the allotment association has strong community links (Princes Road Allotment Association PS25-46)
- The current approach to defining sustainable locations for development based on settlement boundaries is overly reliant on arbitrary boundaries and a flexible greener outlook could be adopted i.e. walking distance to key services (Mrs Helen Sadler, PS25-33)
- Hammonds Farm offends Strategic Policy 3 (J & T Wardrop and the Wardrop Trust, PS25-108).

Strategic Priority 4

- Support for Strategic Priority 4 (Writtle Parish Council PSQ25-440, Mrs Mary Rance PSQ25-6496)
- Welcome the updates relating to waste management guidance (Environment Agency PSQ25-6263)
- Agree the Local Plan should ensure sustainable growth, which should be provided at a variety of settlements and sizes including smaller sites in urban areas where higher densities are appropriate (Dandara PSQ26-6281)
- Wording needs to be changed to reflect the new NPPF in respect of grey belt land (J & T Wardrop and the Wardrop Trust PS25-105)
- The next Local Plan Review should involve a full review of the Green Belt boundaries and seek to identify Grey Belt areas in order fully to accommodate the new NPPF calculated housing and employment needs (Rosehart Properties Ltd PSQ25-3167)

- Concerned that this places a restriction on development in the Green Belt without assessing the potential and opportunities for sustainable development in these locations (Higgins Group PSQ25-5621)
- Sustainable sites within the Green Belt should be safeguarded to meet future development needs, through a Green Belt review (Croudace Homes PSQ25-6039)
- The Local Plan needs to include more previously developed land in the rural area for development, and more smaller sustainable sites of 1 hectare or less in the rural area (Mr and Mrs Andrew Parker PS25-131)
- The current approach to defining sustainable locations for development based on settlement boundaries is overly reliant on arbitrary boundaries and a flexible greener outlook could be adopted i.e. walking distance to key services (Mrs Helen Sadler, PS25-35)
- This does not pursue opportunities to enhance the sustainability of existing service settlements, and to recognise that an opportunity exists to deliver new infrastructure, services and facilities which would benefit these settlements so they grow and thrive, especially where this will support local services. Suggest adding an additional strategic priority or amending Strategic Priority 4 (Croudace Homes PS25-350).

Strategic Priority 5

- Agree the Local Plan should meet housing needs in full, and allocate sites which are capable of delivery in the Plan period (Dandara PSQ25-6282)
- Questions how the requirement to significantly boost the supply of housing and achieve this strategic priority can be met without considering the whole of the plan area for growth and development opportunities (Higgins Group PSQ25-5622).

Strategic Priority 6

- Suggested modification to include reference to meeting local and wider strategic needs, and to allocating new employment areas (Greystoke CB PSQ25-6072)
- The Local Plan needs to include more previously developed land in the rural area for development, and more smaller sustainable sites of 1 hectare or less in the rural area. Also suggest changing the settlement boundary for Chatham Green as it allows for no growth in the village, to include the industrial site at Pondside Nursery (Mr and Mrs Andrew Parker PS25-131, PS25-99).

Strategic Priority 7

- Support for Strategic Priority S7 (Sport England PS25-74)
- Recommend engagement to ensure the built environment is designed to be safe, sustainable and inclusive for all future users, to align with Essex Police Fire and Crime Commissioners plan of creating safe communities (Essex Police PSQ25-2651)
- Advised that there may be a need to engage with specialist policing teams (such as Roads Policing, Counter Terrorism Security Advisors etc) when

designing new communities to ensure the necessary security measures are in situ including for alterations to road layouts or new road infrastructure (Essex Police PSQ25-2651)
- Recommends all new developments achieve Secured by Design (SBD) accreditation (secured via planning condition); and take consideration of the Home Office strategy of reducing 'Violence Against Women and Girls' (Essex Police PSQ25-2651)
- Recommends reference is made to the positive effect of good design on waste reduction and recycling and the Essex Waste Partnership's Waste Strategy for Essex 2024 – amended wording suggested to Para 3.32 (Essex County Council PS25-186)
- Recommends reference is made to waste infrastructure – amended wording suggested to Para 3.37 (Essex County Council PS25-187).

Strategic Priority 8

- Welcome the approach to ensuring that the community's sports and leisure needs generated by new development are met without placing pressure on existing facilities which may already be at capacity (Sport England PS25-75)
- Local Plan has been positively prepared with regards to water resources, and the Water Cycle Study should be regularly updated throughout the Plan's life cycle with ongoing engagement with Essex and Suffolk Water (Environment Agency PSQ25-6291)
- Suggested modification to include primary, acute, community and mental healthcare provision (East of England Ambulance Service NHS Trust PSQ25-5232)
- Sustainable sites within the Green Belt should be safeguarded to meet future development needs and address pressure on infrastructure, through a Green Belt review (Croudace Homes PSQ25-6040)
- Recommend adding a reference to further work being undertaken to consider the traffic impact on local junctions and proposed mitigation measures – amended wording suggested to para 3.40 (Essex County Council PS25-188)
- Recommend adding a reference to gigabit speed broadband for clarity and consistency with ECC best practice policy – amended wording suggested to Para 3.42 (Essex County Council PS25-189).

Strategic Priority 9

- Welcome the approach to ensuring that the community's sports facility needs are met to support the increased population of the district (Sport England PS25-76).

CCC Response
Reference to Secured by Design considered too detailed for this Strategic Priority, but it is covered in detailed design guidance published in the Making Places SPD.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process; and can meet its development requirements without needing to undertake a Green Belt review. This approach accords with National Planning Guidance.

Care of watercourses is considered to be covered by references throughout the Local Plan to green/blue infrastructure, along with supporting text to the Vision, Strategic Policy S4, and site policies close to waterways.
The Council is committed to enhancing safety for girls and women in new development through Policy DM24; minor modification will be proposed to Para 9.17 of DM24 to include reference to Home Office strategy 'Tackling Violence Against Women and Girls', and Safer Parks Guidance.
The Essex LNRS has now been adopted, and its importance is already referenced at Strategic Priority 3, Strategic Policies S4, S11, relevant site policies, and Policy DM16.
Engagement is carried out with Police and Fire authorities on Local Plan development, and through consultation on planning applications.
Minor modifications will be proposed to include reference to waste infrastructure, and in relation to the design of waste reduction and recycling; and to refer to gigabit speed broadband; and to reference further traffic impact work.
Minor modification will be proposed to include reference to primary, acute, community and mental healthcare provision.

Our Vision and Spatial Principles

Vision for Chelmsford

Consultation point	Total number of responses
Vision for Chelmsford	16

Summary of Representations – main issues and requested changes:

- Support expressed for Vision (Rosehart Properties Ltd and Bressole Ltd PSQ25-5300, Dandara PSQ25-6010, Dominus Chelmsford Limited PSQ25-6199, Wates Developments and Hammonds Estates LLP PS25-335, Sport England PS25-77, Broomfield Parish Council PSQ25-6492)
- The Local Plan aligns strongly with our vision for Site 16a East Chelmsford Garden Community (Hammonds Farm) (Wates Developments and Hammonds Estates LLP PS25-335)
- Welcome the opportunity to work in partnership on future development to design out crime (Essex Police PSQ25-2654)
- Plan should do more to at least meet minimum housing needs in full - there are a range of other housing sites which should be supported (Martin Grant Homes PSQ25-2606)
- Vision should include the recreational use of the canals, waterways and Sandford Mill (Essex Waterways Ltd PSQ25-5204)
- It is unclear how the bullet points will be used by decision-makers (Dandara PSQ25-6292)
- Clarify if bullets form part of the vision (Dandara PSQ25-6292, Richborough PS25-164)
- Clarify in the vision that development needs are to be met in full, including for market and affordable housing (Richborough PS25-164)

- Hammonds Farm will not lead to a more connected community and does not accord with the Vision for Chelmsford by 2041 or seek to achieve it (Dandara PSQ25-6010)
- Expand bullet two to specifically refer to supporting the logistics sector (Greystoke CB PSQ25-6073)
- For consistency, expand bullet nine to refer to 'fire and rescue facilities' (Essex County Fire & Rescue Service PSQ25-6093)
- Amend bullet 19 to refer to facilitating the provision of gigabit speed broadband (Essex County Council PS25-190)
- Add a reference to the Chelmer Valley landscape as a key asset at the heart of long-term spatial planning in Chelmsford and a long-term aspiration of achieving a formal designation, recognising its wider, indeed, national significance (Chelmer Valley Landscape Group PSQ25-5135)
- Amend vision to acknowledge the importance of community facilities (Chelmsford City Football Club PS25-212)
- The current approach to defining sustainable locations for development based on settlement boundaries is overly reliant on arbitrary boundaries and a flexible greener outlook could be adopted i.e. walking distance to key services (Mrs Helen Sadler PS25-42)
- Alternative strategies and site allocations promoted by landowners/developers.

CCC Response
Paragraph 4.2 already includes a brief explanation of how the bullet points relate to the Vision.
Minor modification will be proposed to refer to gigabit speed broadband and fire and rescue facilities.
The use of waterways, the Chelmer Valley, growing employment sectors and meeting development needs are adequately addressed already in the Vision or elsewhere in the Plan.
The Vision sets out the overarching aspirations for the Local Plan. The priorities and policies set out how the Vision will be delivered and will be used for decision making.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.

<u>Spatial Principles</u>

Consultation point	**Total number of responses**
Strategic Policy S1 - Spatial Principles	40

- Support expressed for Spatial Principles (Redrow Barratt PSQ25-5165, Obsidian PSQ25-5935, Crest Nicholson PSQ25-6069, Dominus Chelmsford Limited PSQ25-6201, Environment Agency PSQ25-6264, Gladman

Developments Ltd, PSQ25-6309, Richborough PS25-165, Vistry Group PS25-294, Wates Developments and Hammonds Estates LLP PS25-336)

- Support except b and f. A Green Belt is required to accommodate future growth requirements (Rosehart Properties Ltd and Bressole Ltd PSQ25-3173)
- Disagreement expressed to part e. A Green Belt review is required to identify sustainable development opportunities in the Green Belt and so that a more balanced approach to the spatial strategy can be achieved
- Support all except e. The settlement hierarchy is not a robust basis for identifying sustainable development locations. Amend to enable settlements outside the Green Belt to protect or create local services through targeted development, where appropriate (Broomfield Parish Council PSQ25-5150)
- Unclear how the principles will be used together and alongside the 2024 NPPF in decision making including for development proposals in the Green Belt (Higgins Group PSQ25-562)
- The Spatial Principles must also consider the urgent need for housing to avoid worsening housing supply and affordability in Essex (Obsidian Strategic Asset Management Ltd PSQ25-5667)
- A new settlement away from Chelmsford's urban area does not follow the principles promoted (Obsidian PSQ25-5935, Dandara PSQ25-6011, PSQ25-6293)
- Focusing new development upon higher order settlements outside the Green Belt (part e) will result in an increasingly unsustainable pattern of development. There has been a consistent failure to undertake a Green Belt Review to identify opportunities for sustainable development on land which no longer meets Green Belt purposes (Barratt David Wilson - Eastern Counties (BDW) PSQ25-6032)
- Amend part c to 'optimise' rather than 'promote' previously developed land for development to better reflect the 2024 NPPF (Dominus Chelmsford Limited PSQ25-6201)
- Parts a and e - Additional growth is required in villages to ensure that they retain their vitality and viability and help meet the housing requirements of the Standard Method (Dandara PSQ25-6293)
- Amend policy to state that the principles are a starting point for determining speculative applications (Gladman Developments Ltd PSQ25-6309)
- Policy should include express support for development that enables and supports healthy lifestyles and advance the well-being of communities (Chelmsford City Football Club PS25-212)
- Policy should be underpinned by a Green Belt Review, demonstrating that the Spatial Strategy is based upon the most sustainable options for meeting Chelmsford's long-term development needs. Exceptional circumstances exist to justify a Green Belt Review (Vistry Group PS25-294)
- Add an additional Spatial Principle to enhance the vitality and sustainability of existing service settlements (Croudace Homes PS25-353)
- The current approach to defining sustainable locations for development based on settlement boundaries is overly reliant on arbitrary boundaries and a flexible greener outlook could be adopted i.e. walking distance to key services (Mrs Helen Sadler PS25-37, PS25-38, PS25-40, PS25-41, PS25-43)

- Need to undertake a Green Belt Review to appraise the opportunities for sustainable development on land that does not contribute strongly to the purposes of the Green Belt
- Amend para 4.7 to reflect the new NPPF (J & T Wardrop and the Wardrop Trust PS25-106)
- Amend para 4.11 to align with para 4.12 to reflect that not only redevelopment within the city but also expansion around settlements can enhance its vitality (Crest Nicholson PSQ25-6069, Taylor Wimpey Strategic Land PS25-311, Higgins Homes PS25-346)
- Amend para 4.15 to include expanded/relocated healthcare services and expanded/relocated emergency services (East of England Ambulance Service NHS Trust PSQ25-5235)
- Amend para 4.15 to include waste infrastructure (Essex County Council PS25-191)
- Amend para 4.16 to include emergency services facilities (East of England Ambulance Service NHS Trust PSQ25-5237)
- Amend para 4.16 to include fire & rescue facilities as a type of infrastructure (Essex County Fire and Rescue Service PSQ25-6095)
- Amend para 4.16 to include police facilities as a type of infrastructure (Essex Police PSQ25-6125)
- Amend para 4.16 to include recycling and other waste infrastructure (Essex County Council PS25-192)
- Engage Essex Police to ensure new infrastructure during construction and the final building stage are safe and secure and do not compromise Emergency Service Access (Essex Police PSQ25-2655)
- Alternative strategies and new/expanded site allocations promoted by landowners/developers including 'Grey Belt' land.

CCC Response
The Council can meet its development requirements without needing to undertake a Green Belt review. This approach accords with National Planning Guidance.
Minor modification will be proposed to para 4.16 to clarity that the infrastructure types is not limited to those listed. It is not considered necessary to list additional types of infrastructure (such as waste and emergency services). New infrastructure requirements are also addressed elsewhere in the plan which should be read a whole.
The Settlement Hierarchy is just one of several considerations for the Spatial Strategy, along with the Vision and Spatial Principles, and is considered to be a robust approach.
Other proposed development sites are dealt with in the consideration of Strategic Policy S7 and addressed by the Pre-Submission Integrated Impact Assessment.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.
The Pre-Submission Local Plan will be examined under the 2023 NPPF which does not refer to Grey Belt.

Creating Sustainable Development

Strategic Policy S2 – Addressing Climate Change and Flood Risk

Consultation point	Total number of responses
Strategic Policy S2 – Addressing Climate Change and Flood Risk	16

Summary of Representations – main issues and requested changes:

- Welcome reference to South East (Inshore) Marine Plan (Natural England PSQ25-6242)
- Support new development to provide for active and sustainable travel modes in recognition of the contribution that this can make locally to addressing climate change (Sport England PS25-78)
- Support additions to reasoned justification to include the recommended guidance documents relating to SuDS. Consider additionally or alternatively referring to the guidance under Policy DM18 for improved visibility within the Plan (Environment Agency PSQ25-6265)
- Support the policy and evidence in relation to minimising the risk of flooding from development. To complement the Council's evidence and demonstrate the acceptability of the Hammonds Farm site in flood risk terms, a Flood Risk Strategy is submitted. This sets out the flood performance of the high-level masterplan proposals has been tested in detail with a hydraulic model constructed in 2025, building upon existing EA models. Based on this technical work, there are no flood risk technical constraints identified that would impact the site's deliverability in flood risk terms (Wates Developments and Hammonds Estates LLP PS25-308)
- Support for the policy, but suggest it should also explicitly emphasise support for large-scale renewable energy infrastructure, such as solar farms and energy storage systems (Infrabee PSQ25-5735)
- Future development should take into account and protect rural landscapes and character and also the impact upon drainage and SuDS (Chelmsford Garden Community Council PSQ25-4962)
- Supports the Council's ambition to reduce carbon emissions, however, any emission reduction targets that go beyond Part L of the Building Regulations should consider the forthcoming '2025 Future Homes Standards' and therefore not set a policy expectation that cannot be delivered and create viability issues, especially for existing Local Plan site allocations (Chelmsford Garden Community Consortium PSQ25-6347, Vistry Group PSQ25-6370, Hopkins Homes PS25-263, Vistry Group PS25-133)
- Supports the Council's ambition to reduce carbon emissions, but the policies as drafted (including DM31) go beyond national policy and guidance without evidence to justify the approach towards net zero operational and the use of on-site renewables to provide all (regulated and unregulated) operational energy. In line with the PPG that locally set energy performance standards for new housing should not exceed the equivalent of Level 4 of the Code for

Sustainable Homes. The policies should not be a requirement but applied flexibly (Croudace Homes PSQ25-6041)

- Requirements of the policy and subsequent Development Management policies (DM25 and DM31) have not been sufficiently tested regarding viability for older persons housing (Churchill Living and McCarthy Stone PSQ25-6332)
- The Regulation 19 Viability Note (November 2024) ascribes broad values across the plan area but does not address site specific matters insofar as they relate to Strategic Growth Site 3a. It suggests that the requirement for SANGs "…is only likely to apply to the Hammond's Farm strategic site". However, Natural England's Reg. 18 consultation response has asked that SSSI mitigation be included as a requirement for Strategic Site 3a and there is no indication that it has been considered as part of the Council's viability assessment (Hopkins Homes Ltd PS25-265)
- Although some interventions to mitigate and adapt to climate change will also have positive impacts for biodiversity, it should not be required of BNG measures to have to mitigate and adapt to climate change. The requirement "Assists the delivery of Biodiversity Net Gain that will deliver mitigation and adaptation benefits" will be difficult to evidence for applications and make it more difficult to deliver biodiversity enhancement schemes (Dandara PSQ25-6294)
- Clarify the policy purpose - second sentence should be deleted and first sentence amended to make clear that the bullets that follow are references to specific development management policies. The first two bullet points should be deleted (Vistry Group PS25-133).

CCC Response
Reference to the Environment Agency's Approach to Groundwater Protection; The CIRIA C753 SUDS Manual; and Sustainable Drainage Systems: Non-Statutory Technical Standards has also been added to Policy DM18 for improved visibility within the Plan.
The suite of policies in the Plan seek to protect the character of landscapes and ensure suitable drainage and SuDS support development.
Essex wide viability reports support the policy requirements and have fed into the Council's Local Plan Viability testing and are shown to be viable. No changes required.
Building Regulations (including the Future Homes Standard) set minimum standards that must be achieved for energy performance in new homes and buildings - but these are a 'floor' and not a 'ceiling'. Local authorities are allowed to set higher standards. Planning policy is necessary to address the shortcomings within the Building Regulations 2021 and the proposed Future Homes Standard 2025. These do not adequately address operational carbon emissions from new development as they only cover a proportion of energy use of a building, namely regulated energy use and they rely on grid decarbonisation to achieve 'net zero'.
The 'net zero' evidence base developed for Greater Essex demonstrates that the policy is technically feasible to deliver and at reasonable cost. There are no significant barriers to delivery in terms of skills and supply chains in Essex. In other areas (e.g. Cornwall, Bath and North East Somerset) where the equivalent policy has been in place has also shown that there has been no slowdown in the submission of planning applications or delivery of housing.

The Council's Viability Update Note 2024 adjusts the cost assumptions associated with achieving net zero in accordance with the latest information reported in the Essex Net Zero Policy – Technical Evidence Base produced by Introba Consulting Ltd with Currie & Brown and Etude for Essex Couty Council. Research referred to in the Essex Open Legal Advice – Energy Policy and Building Regulations (2025 update) (Para 54 – 55) (Pre-Submission Local Plan Evidence Base reference CC004) provides evidence of an uplift in values too which is also positive for viability.
When a Planning application is submitted for a site (regardless of whether it is allocated or not) planning law requires that it must be determined in accordance with the Development Plan (in place at the time) unless material considerations indicate otherwise. However, increasing weight should also be given to policies contained in the emerging Local Plan as it progresses through the Local Plan preparation process. It will be a matter for the Development Management process to determine the weight given to emerging policies in the planning balance when coming to a decision on an application.
The approach of using energy metrics to deliver net zero homes aligns with the recommendations of the Government's own advisors, the Climate Change Committee. They recommended a space heating target of 15-20 kwh/m2/year for all new homes by 2025. Policy DM31 sets a space heating requirement that reflects the Climate Change Committee's advice, and which is based on a robust and sound technical evidence base, which includes assessment of potential impact on viability.
It would inhibit the effectiveness of the policy if it was advisory only. Applying the policy 'flexibly in a stepped approach' would create uncertainty among developers regarding what is required and what is only advised, increasing the workload of local authority planning officers who will have to communicate these stepped changes to developers. This outcome can be avoided if all the standards in the policy are implemented as requirements from the point of plan adoption. It should also be noted that the policy itself has elements of flexibility within it. An offsetting mechanism is available as part of Requirement 4 to allow developments to achieve compliance where it is not technically possible to match on-site renewable energy generation with annual average energy demand. The energy performance standards are requirements but how they should be met is not specified which gives developers freedom and flexibility in the design choices adopted to achieve the standard. In addition, alternative routes to compliance are set out for minor development proposals and also for buildings that are certified Passivhaus.
For older persons housing that is in the form of self contained residential units then the policy requirements all apply. However, for 'non residential buildings' (which the reasoned justification notes includes older persons housing that is in the form of a residential institution) then the limit set in requirement 3 of the policy does not apply, and instead the Energy Use Intensity just needs to be reported – no specific target is required to be met. The technical evidence includes cost analysis of the typologies modelled and this has been used to inform the viability assessment for the Local Plan. An allowance has been made for the policy costs in the viability assessment and is shown to be viable.
Additional wording added to the reasoned justification to clarify that Biodiversity Net Gain is to be delivered in accordance with Policy DM16.

The policy supports delivery of the Council's declared climate and ecological emergency in 2019 and proposed work towards reaching net zero by 2030.

Strategic Policy S14 - Health and Wellbeing

Consultation point	**Total number of responses**
Strategic Policy S14 - Health and Wellbeing	12

Summary of Representations – main issues and requested changes:

- Support for policy (Broomfield Parish Council PSQ25-6493, Cliffords Group Ltd PSQ25-3028)
- Support the policy requirements accord with Sport England's Uniting the Movement Strategy and are consistent with the NPPF (Sport England PS25-79)
- All new development proposals should have early engagement with Essex Police, to support and expedite this policy and support and mitigate crime prevention (Essex Police PSQ25-2658)
- Welcome a reference to improving public angling opportunities where developments are adjacent to rivers or lakes (Environment Agency PSQ25-6270)
- Support for policy but it should be expanded to refer/reflect the needs of older people (Mrs Mary Rance PSQ25-6392)
- In the first bullet, also refer to the Essex Joint Health and Wellbeing Strategy to help reduce health inequalities including health and improve the opportunities for adults and children to live well (Essex County Council PS25-195)
- The Council should not view the provision of sports, leisure, and community facilities as a minimum requirement but should maximize opportunities to deliver such development in well-connected and accessible locations (Cliffords Group Ltd PSQ25-3028, PSQ25-4982)
- Remove the requirement on older persons housing providing a Health Impact Assessment as specialist housing for older people has a number of health benefits. Amended wording proposed (Churchill Living and McCarthy Stone PSQ25-6331)
- Health Impact Assessments should not be required on all developments over 50 homes especially if they are allocated in the plan and meet the policy requirements. It should only be required on unallocated developments of over 100 units which will not have had their health impacts assessed as part of the preparation of the local plan (Home Builders Federation PSQ25-5475)
- Amend para 5.26 to refer to `Use Class C2 (Residential Institutions)' to provide consistency with the policy and the EPOA Essex Healthy Places Advice notes for planners, developers and designers (Essex County Council PS25-196)
- Promoted sites (Land south of Pratts Farm Lane, Land at Essex Regiments Way and Back Lane) align with the vision of this policy by promoting active and healthier lifestyles (Cliffords Group Ltd PSQ25-3028)
- Alternative strategies and new/expanded site allocations promoted by landowners/developers.

CCC Response
No requirement to contribute towards priorities in the Essex Joint Health and Wellbeing Strategy added, as this document is subject to change and outside the control of the Council.
Minor modification will be proposed to para 5.26 to include a reference to Use Class C2.
Reference to promoting/supporting angling is considered too detailed for a Strategic Policy.
Site level Health Impact Assessments will provide more detail on the health and wellbeing impacts of specific development projects.
Requirements for Health Impact Assessments accord with the Essex Planning Officers Association (EPOA) – essex-healthy-places-advice-notes-for-planners-developers-and-designers.pdf
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process.

Strategic Policy S15 – Creating Successful Places

Consultation point	Total number of responses
Strategic Policy S15 – Creating Successful Places	2

Summary of Representations – main issues and requested changes:

- All new development proposals should have early engagement with Essex Police, to support the prevention and mitigation of crime across developments (Essex Police PSQ25-2659)
- Question need for the policy as it appears to be covered by other policies in the plan or NPPF (Dandara PSQ25-6014).

CCC Response
This Strategic Policy is considered necessary as it helps to address Strategic Priority 7.

Strategic Policy S3 – Conserving and Enhancing the Historic Environment

Consultation point	Total number of responses
Strategic Policy S3 – Conserving and Enhancing the Historic Environment	5

Summary of Representations – main issues and requested changes:

- Support policy (Historic England PSQ25-5815)

- Welcome the policy and great weight on the preservation/enhancement of designated heritage assets and their setting (Writtle Parish Council PSQ25-453)
- Welcome the recognition of the heritage and leisure importance of the waterway (Chelmsford Rivers and Canal Link group PS25-275)
- As operators of the Chelmer & Blackwater Navigation we are pleased to see that the significance of its structures, landscape character, leisure and recreational value are recognised (Essex Waterways Ltd PSQ25-5205)
- Support policy and its commitments including to celebrate Chelmsford's 'rich history. Support the creation of a Heritage Reference Group, for the waterways to be considered as Heritage Assets and a policy to educate young people on heritage. The Meadows development provides an opportunity to enhance riverside walks and there should be plans for the future use of Sandford Mill and Shire Hall (Chelmsford Civic Society PSQ25-2707).

CCC Response
The support for the policy is welcomed.
Some of the above comments are not Local Plan matters including the creation of a Heritage Reference Group and a policy to educate young people on heritage. Sandford Mill is allocated as a Special Policy Area.
The definition of a heritage asset in the NPPF does not include rivers. However, Springfield Basin is included on the local list and therefore a non-designated heritage asset. Parts of the river network are also within Conservation Areas, i.e. the part of the river can adjacent the High Street and also the entire Navigation, to be considered as part of the designated heritage assets. Parts of the river network have been considerably altered, most notably by the 1960s flood defence works, which created concrete embankments and altered the course of the river. As such it would not be appropriate to treat more of the river network as a heritage asset.
It is understood that Essex Shire Hall Trust propose to bring Shire Hall back into subject to planning permission. Proposals would be adequately considered against policies in the plan.

Strategic Policy S4– Conserving and Enhancing the Natural Environment

Consultation point	**Total number of responses**
Strategic Policy S4 – Conserving and Enhancing the Natural Environment	15

Summary of Representations – main issues and requested changes:

- Support for policy (Broomfield Parish Council PSQ25-6494)
- Pleased with policy wording and satisfied that wastewater treatment capacity and local water environment will be protected by the plan policies (Environment Agency PSQ25-6266)
- Supports the requirement for new development to maximise opportunities for the preservation and connection of natural habitats in accordance with the

Essex Local Nature Recovery Strategy (LNRS (Essex County Council PS25-198)

- Supports policy requirements for BNG. Viability assessments carried out by ECC demonstrates that a 20% BNG is achievable and viable and meets the NPPF requirements. The Environment Act sets 10% as the minimum standard nationally and does not set a maximum (Essex County Council PS25-197)
- Support expressed for the policy including 20% BNG in garden community developments but clear evidence will be required by the Planning Inspector to justify this policy requirement (Essex Wildlife Trust PSQ25-5059)
- Support for this policy which does not require applications to provide more than 10% BNG, other than the Garden Communities (Dandara PSQ25-6295)
- The Natural Environment section of the PPG has been recently updated to cover the role of Local Nature Recovery Strategies (LNRSs). This guidance helps local planning authorities to interpret their duty to “have regard” to LNRSs and integrate LNRSs into local plans and considering them in planning decisions as material considerations (Essex County Council PS25-198)
- The Council's 'Improvement Plan for Rivers and Waterways in and around Chelmsford is supported. We plan to work with the Council to implement its aims (Essex Waterways Ltd PSQ25-5206)
- Para 5.55 – Welcome the reference to additional recreational mitigation measures to address ‘alone’ impacts of new development within the RAMS Zone of Influence (Natural England PSQ25-6243)
- Expand last para of the policy to refer to ‘other mitigation measures’ and ‘future iterations’ of the RAMS in line with para 5.55 (Natural England PSQ25-6243)
- Para 5.47 - Planting around the waterways should not be allowed to interfere with the public enjoyment of the waterways or conceal the rivers from public view. The plan appears to be too heavily skewed away from use of the waterways and this imbalance should be addressed (Chelmsford Rivers and Canal Link group PS25-276)
- Para 5.49 should also require applicants to have regard to the Essex Green Infrastructure Standards (2022) to facilitate securing multifunctional green infrastructure. This has been endorsed by Natural England and aligns with the National Green Infrastructure Framework (Essex County Council PS25-200)
- Delete requirement for developers to demonstrate that wastewater treatment capacity is available ahead of any occupation of development as it is unnecessary and impractical. The Local Plan provides the means, through its evidence base (particularly the WCS), to ensure that new development is located in areas that have the potential to be served by sufficient waste-water capacity (Vistry Group PS25-135)
- The plan should give strong weight to LNRSs for development site allocation at a local level to avoid impacts to existing sensitive natural assets (The Woodland Trust PSQ25-1984)
- The plan should set standards for high-quality green infrastructure for development e.g. by requiring 5 trees per dwelling for major development or per 1,000sqm of non-residential floorspace, and by ensuring no one is more than 300m from their nearest natural green space and set a strong standard for the retention of trees within developments (The Woodland Trust PSQ25-1984)

- The Local Plan should go beyond minimum requirements for BNG and be an example of best practice, e.g. by requiring all developments to deliver 20 % BNG and all units to be maintained for at least 50 years (The Woodland Trust PSQ25-1984)
- The requirement for 20% BNG has not been justified in the Council's evidence base as being financially viable or practically deliverable/viable. It should be expressed as a target rather than an absolute requirement (Croudace Homes PSQ25-6042).

CCC Response
Policy support and partnership working noted.
The plan encourages use of the waterways and their environs including site policies 1a and Special Policy Area 5. Strategic Priority 9 also outlines how some of the ambitions of the Council's Plan for Improving Rivers and Waterways in and around Chelmsford have been translated into the Local Plan.
Part E of Policy S17 Future of Chelmsford City Centre, states that proposals should capitalise on the waterway network to enhance the visibility, access and recreational use of the rivers and Navigation, as appropriate.
Minor modifications will be proposed to para 5.49 to refer to the Essex Green Infrastructure Strategy and the Essex Green Infrastructure Standard.
The policy appropriately requires developments to demonstrate sufficient capacity for wastewater treatment and disposal to serve the site as supported by the plan evidence base and Anglian Water Services Ltd.
The policy does states that the Council will ensure that new development maximises opportunities for the preservation, restoration, enhancement, and connection of natural habitats in accordance with the LNRS or future replacements. Minor modifications will be proposed to para 5.45 to ensure the reference to the LNRS is up to date.
Policy DM16 already sets out the Council's expectations for biodiversity and geodiversity in development. In addition, Policy DM17 sets out the requirement for new tree planting. Access standards are set out in Appendix B and follow the NPPF and Sport England's guidance.
10% BNG is a national requirement. 20% BNG for the Garden Community allocations has been subject to viability testing and is deliverable. Although there is no maximum to the standard, the Council has no plans to go beyond the 10% BNG on all sites as this has not been viability tested.
Minor modifications will be proposed in relation to additional recreational mitigation measures and to subsequent revisions of the RAMS.

Strategic Policy S5 – Protecting and Enhancing Community Assets

Consultation point	**Total number of responses**
Strategic Policy S5 – Protecting and Enhancing Community Assets	8

Summary of Representations – main issues and requested changes:

- Support for policy (Sport England PS25-80, Dandara PSQ25-6013, Cliffords Group Ltd PSQ25-3007)
- It is imperative that the ongoing use of the allotment site at Princes Road, Chelmsford should be maintained, and any future change of use (due to potential sale of land) should be resisted. Any change of use would increase the area's allotments deficit. It is a green space and wildlife corridor, allotment gardening promotes healthy living, and the allotment association has strong community links (Princes Road Allotment Association PS25-46).
- Support policy in principle but it should be more flexible. Where it can be demonstrated that health facilities are surplus to requirements or will be changed, it should be accepted in principle that the facility is neither needed nor viable for its current use, with no requirement for retention of a community facility use on the land (NHS Property Services Ltd PSQ25-5602)
- For consistency, include a reference to "fire & rescue facilities" (Essex County Fire and Rescue Service PSQ25-6097)
- Para 5.58 – Include a reference to the Essex County Fire and Rescue Services role in creating 'resilient' communities (Essex County Fire and Rescue Service PSQ25-6098)
- Promoted sites (Land south of Pratts Farm Lane, Land at Essex Regiment Way and Back Lane) align with the policy (Cliffords Group Ltd PSQ25-3007)
- The allocation of promoted site adjacent to Great Baddow High School, provides an opportunity to address the objectives of this draft policy (Obsidian PSQ25-5936).

CCC Response
The policy is consistent with national planning policy and appropriately covers healthcare facilities.
Minor modifications will be proposed in response to comments from Essex County Fire and Rescue Services.
The Council can meet its development requirements without needing to undertake a Green Belt review. This approach accords with National Planning Guidance.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process.

How will Future Development Growth be Accommodated?

This section of the consultation document sets out Strategic Policies which underpin and guide the Spatial Strategy including policies related to securing infrastructure and delivering growth.

Para 6.1 and Strategic Policy S6 – Housing and Employment Requirements

Consultation point	**Total number of responses**
Para 6.1 and Strategic Policy S6 – Housing and Employment Requirements	72

Summary of Representations – main issues and requested changes:

Windfall allowance

- Need to justify the windfall allowance and why it has increased from 100 to 175 dpa. 100 dpa is most appropriate as set out in the Housing Windfall Assessment, April 2024. The windfall rate appears retrofitted to meet the transitional arrangements and artificially inflates the supply (Richborough PS25-173, PSQ25-166)
- Evidence is needed to support a higher rate of windfall across the entire plan period (Home Builders Federation, PSQ25-5471) and basing it on historic trends is not robust (Bellway Homes Ltd (Essex) PSQ25-6360, PSQ25-6388)
- Windfall allowance should be reviewed considering current market conditions and reduced to reflect current delivery levels (Hill Residential Ltd PS25-354)
- The past windfall average includes 2 years of unusually high supply (350 homes) which disproportionately impacts the calculation and is unlikely to be maintained at a constantly high level over the plan period (Strutt and Parker (Farms) Limited PSQ25-5519)
- Plan is flawed and likely to be ineffective – there is an over reliance on windfall sites (Dandara PSQ25-6015, Dandara Eastern PSQ25-6209) meaning the plan is at risk of falling short on housing delivery (Urban Provincial PSQ25-4972)
- The timing of new housing supply needs to be justified. Windfall sites should be allocated if the Council is certain they will get planning permission (J & T Wardrop and the Wardrop Trust PS25-109)

Housing Requirement

- Support use of the NPPF transitional arrangements and housing requirement of 1,210 dpa. Acknowledge the Plan allocates a 'minimum' of 162,646sqm of new employment floorspace which exceeds the recommended minimum employment space requirements over the period to 2041 (Essex County Council PS25-201)
- Broadly supportive of policy and CCC's commitment to meeting its identified housing and employment needs within the administration's boundary through-out the plan period (Brentwood Borough Council PSQ25-6159, Rochford District Council PSQ25-6194)
- Accept the plan housing requirements (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6133)
- Largely supportive of the plan. 1,210 dpa is below full local housing needs but the reference to "minimum" strikes an appropriate balance (Dominus Chelmsford Limited PSQ25-6203)
- Support the identified housing requirement of 22,990 new homes as evidenced by the Strategic Housing Needs Assessment. This will assist in addressing the Council's Housing Crisis declared in 2022. Support utilising the NPPF transition arrangements which will avoid plan-making delays and exceeding the 2023 Standard Method figure of 955 dpa (Wates Developments and Hammonds Estates LLP PS25-310)

- There is no requirement to meet in full the new 2024 Standard Method figure of 1,454 dpa through this Local Plan Review (Wates Developments and Hammonds Estates LLP PS25-310)
- Plan is technically sound but should seek to meet housing requirements in full to address the housing crisis more effectively and allocate more homes including at Ford End (Dandara PSQ25-6296)
- Plan should be meeting housing needs in full (1,454 dpa) (Bloor Homes (Eastern) PSQ25-6141, Richborough PS25-173, PS25-166, Martin Grant Homes, PSQ25-2609, PS25-147), as required by the new NPPF, given the high cost of housing, need to address the housing crisis and need for affordable housing. The greater risk with strategic site delivery requires a higher buffer (Home Builders Federation PSQ25-5471)
- Object to the 1,210 dpa housing requirement/ it is not justified (Martin Grant Homes PSQ25-2609, PS25-147, Cliffords Group Ltd PSQ25-4958, Welbeck Strategic Land V Limited PSQ25-3210, Catesby Land and Planning PSQ25-5603, Greystoke CB PSQ25-6084)
- The SHNA needs to be updated to reflect the up-to-date standard method. Plan should be meeting its minimum housing needs to avoid exacerbating additional unmet housing needs in a region, address chronic affordability issues and deliver needs for affordable homes (Martin Grant Homes PSQ25-2609, PS25-147)
- A modest increase in dwelling stock or affordability ratios could result in the proposed housing requirement falling below 80% of the Standard Method figure. The plan should remain flexible to accommodate potential updates to the Standard Method to avoid becoming outdated before its adoption (Miscoe Enterprises Ltd PSQ25-2987, Cliffords Group Ltd PSQ25-2999, A.G. & P.W.H. Speakman PSQ25-3038, Daniel James Developments PSQ25-3054, Weal Properties Ltd PSQ25-3070, Mrs R Armstrong and Mr B Howard Ms Becky Armstrong PSQ25-3076, Cliffords Group Ltd & Mr Mark Peters PSQ25-6502, Cliffords Group Ltd PSQ4954, PSQ25-4956, The Bucknell Family PS25-286, Taylor Wimpey Strategic Land PS25-315, Crest Nicholson, Dandara Strategic Land, and Taylor Wimpey Strategic Land PS25-326)
- In the absence of overriding constraints or exceptional circumstances, the Plan should be meeting the Council's housing and affordable needs in full. This will significantly boost housing delivery and address the Written Ministerial Statement of January 2025 and the Council's declared Housing Crisis (Barratt David Wilson – Eastern Counties (BDW), PSQ25-6034)
- Providing for 1,210 dpa will result in a shortfall of 4,636 dwellings over the plan period and exacerbate acute affordability issues in Chelmsford. The change from Preferred Options appears to have been made to simply meet the transitional arrangements - further justification is required to evidence why meeting 83% is appropriate. There has been time to consider the 2024 NPPF and additional site allocations could be made to meet needs in full (Bloor Homes (Eastern) PSQ25-6141)
- The evidence base to support the housing requirement and supply is inadequate. It is unclear why adopted allocations have failed to come forward. The plan is reliant on a small number of large sites. Additional allocations are needed. Housing requirement appears to have been arbitrarily set to meet the transitional arrangements and should be more ambitious (Hill Residential Ltd PS25-354)

- There is no plan evidence to justify the uplift from 913 to 1,210 by any of the exceptional circumstances outlined in the PPG. The plan does not meet the transitional arrangements, should be meeting housing need in full and identify additional sites for delivery in the first five years (Gladman Developments Ltd PSQ25-6313)
- Amend the housing requirement and allocate additional sites to increase the supply buffer. Rejection of a higher growth scenario and Land West of Chelmsford as it could result in 'too much' housing is contrary to national policy (Crest Nicholson, Dandara Strategic Land, and Taylor Wimpey Strategic Land PS25-326)
- Plan should allocate more sites to meet the full housing requirement of 1,454 dpa (Greystoke CB PSQ25-6084). Hammonds Farm is questionable based on the evidence base and planning logic and has unrealistic delivery rates as supported by 'Start to Finish' research from Lichfields. More sustainable sites have been dismissed without obvious reasoning including land at North-West Chelmsford and SWF (Dandara PSQ25-6015, Dandara Eastern PSQ25-6209)
- Need to increase housing requirement to help meet unmet needs outside Chelmsford (Strutt and Parker (Farms) Limited PSQ25-5519)
- Housing requirement should be increased to meet or exceed the revised Standard Method figure of 1,454 dpa to meet identified housing needs in full. 1,210 dpa will exacerbate housing affordability and fail to address the Council's declared Housing Emergency. Suggestions that meeting the full could lead to an oversupply of new homes is unsubstantiated, inconsistent with National Policy and not justified (Catesby Land and Planning PSQ25-5603)
- No objection to the new interim housing requirement, but advocate planning for the full 1,454 dpa and allocating further new sites in the plan including a combined site in Boreham (Wates Developments Limited PSQ25-5302)
- Completions in recent years is significantly below the new target of 1,210 net new homes risking a downward trend in housing delivery. Plan should allocate further sites including in the Green Belt/Grey Belt and increase the housing target to meet the NPPF (December 2024) requirements. The 1.8% supply buffer is inappropriate and not evidenced (Newell Properties Development Ltd PSQ25-5043)
- Notwithstanding the transitional arrangements, the plan should still seek to maximise opportunities to deliver housing. Rejecting a higher growth option as it could result in an 'oversupply' of housing is questionable (Taylor Wimpey Strategic Land PS25-315)
- Housing requirement should be reviewed considering Written Ministerial Statements (WMS) of 30 July and 12 December 2024 (Gearston Ltd PSQ25-3045). 1,210 dpa does not appear to be justified beyond its function in maintaining the plan within the transitional arrangements. Need to demonstrate how requirement aligns with current and future demographic trends and housing market signals. Need to reassess the site allocations and consider whether additional land could be released to ensure full housing needs are met (Miscoe Enterprises Ltd PSQ25-2987, Cliffords Group Ltd PSQ25-2999, A.G. & P.W.H. Speakman PSQ25-3038, Daniel James Developments PSQ25-3054, Weal Properties Ltd PSQ25-3070, Mrs R Armstrong and Mr B Howard Ms Becky Armstrong PSQ25-3076, Cliffords Group Ltd & Mr Mark Peters PSQ25-4966, Cliffords Group Ltd PSQ4954,

PSQ25-4956, The Bucknell Family PSQ25-286, Crest Nicholson, Dandara Strategic Land, and Taylor Wimpey Strategic Land PS25-326)

- Concerns that the housing supply has been artificially suppressed to remain within the transitional arrangements. Need to allocate additional housing sites (The Bucknell Family PS25-286) to provide a generous and resilient supply buffer to support housing delivery over the plan period (A.G. & P.W.H. Speakman PSQ25-3038, Daniel James Developments PSQ25-3054, Cliffords Group Ltd PSQ4954)
- The proposed approach to housing delivery and housing requirements under the transitional arrangements, should be seen in the context of the notable housing crisis. Written Ministerial Statements set out a clear expectation that LPAs should take a positive stance to opportunities to deliver housing (Gearston Ltd PSQ25-3045)
- The Plan provides minimal flexibility should sites be delayed and existing allocations should be increased including Growth Site Policy 11c (Welbeck Strategic Land V Limited PSQ25-3210)
- Table 1 – The plan is planning for an insignificant and insufficient amount, meaning the plan lacks flexibility, is vulnerable to changing circumstances and is inconsistent with the Government's wider objectives. Concerns that sites allocated in the adopted Local Plan have not come forward including SWF. Given devolution, the review plan could be in place for a decade so should seek to significantly boost the supply of housing land, rather than just meeting the minimum requirements under the transitional arrangements (Croudace Homes PS25-356)
- Plan is flawed and likely to be ineffective – the 1.5% is inflexible and there is an over reliance on one large strategic allocation. Completions rates are falling, and the delivery of allocated sites are slipping and unrealistic. Hammonds Farm is questionable based on the evidence base and planning logic and has unrealistic delivery rates as supported by 'Start to Finish' research from Lichfields. More sustainable sites have been dismissed without obvious reasoning including land at North-West Chelmsford and SWF (Dandara PSQ25-6015, Dandara Eastern PSQ25-6209)
- 100 dwellings are insufficient to meet Danbury's housing needs identified in the Danbury and AECOM Danbury Local Housing Needs assessments to the detriment of the vibrancy and health of the settlement. Plan should allocate additional land in Danbury (Gleeson Land PSQ25-6262)
- The housing figure is not robust given that historical evidence could mean the target is 10% below average delivery of annual windfall dwellings (Mrs Helen Sadler PS25-28)
- No consideration of constraints when determining the Housing Requirement. One such constraint is the dramatic rise in flood risk from historic overdevelopment observable in hydrometric data at Rushes Lock (Save Sandford Mill Campaign PSQ25-5163)
- The public have not been adequately consulted, and insufficient consideration has been given to the need to meeting affordable housing needs to address the Council's declared Housing Emergency
- The trajectory reflects the 1,400+ requirement rather than the 1,210 figure. If the plan is for 1,400+ homes, it should state that

- Alternative strategies and new/expanded site allocations promoted by landowners/developers.

Submission Date

- The Council is deliberately rushing to submission to avoid having to meet 1.454 dpa (Catesby Land and Planning PSQ25-5603, Barratt David Wilson – Eastern Counties (BDW) PSQ25-6034)
- Plan should meet Chelmsford's Local Housing Needs in full now and not avoid this by rushing submission

Supply buffer

- Reallocation of the supply buffer is pragmatic and appropriate, as the Council had already consulted on an evidence base to support a spatial strategy of this quantum and has updated it housing evidence to support a revised housing requirement. There is no national requirement for a buffer to be allocated in the supply trajectory, but if a supply buffer and/or a higher housing target would be beneficial, more sites could be sought via major modifications. There is land available within the allocation boundary of Strategic Growth Site 16a East Chelmsford Garden Community (Hammonds Farm) (Wates Developments and Hammonds Estates LLP PS25-310)
- The Plan should apply a 5% buffer (Bellway Homes Ltd (Essex) PSQ25-6360, PSQ25-6388, Hill Residential Ltd PS25-354, Strutt and Parker (Farms) Limited PSQ25-5519), a sufficient/higher buffer (Welbeck Strategic Land V Limited PSQ25-3210), a 20% buffer (Home Builders Federation PSQ25-5471, Wates Developments Limited PSQ25-5302, Richborough PS25-173)
- Identify additional residential allocations to ensure sufficiently flexibility and overcome any potential shortfall in projected delivery from strategic allocations. Amend Table 1 to show changes to the yields from the existing allocations and include a 20% buffer. The plan relies on garden communities that can be slow/fail as supported by 'Start to Finish' research by Lichfields. Identify additional residential allocations based on a more dispersed approach including within urban areas and existing sustainable settlements (Richborough PS25-170)
- The Plan is failing to plan for enough new homes. Concerns over the capacity and trajectory of Hammonds Farm. Allocate new development including in Great Leighs and Patching Hall Lane (Bellway Homes Ltd (Essex) PSQ25-6360, PSQ25-6388)
- Policy will exacerbate existing and increasing issues of unaffordability and may need to accommodate unmet needs from neighbouring authorities. Plan should promote delivery and wider benefits of the full CNEB including adding it to the Key Diagram. Plan should allocate additional sites to help fund it including land north of Wheelers Hill (Hallam Land Management PSQ25-6382)
- The plan focuses growth on the garden communities which require long lead in times and can stall – allocate a greater number of sites to help meet the higher Standard Method, provide flexibility and an appropriate buffer (Higgins Group PSQ25-5624)

- Chelmsford is likely to have an increased demand for housing because of new infrastructure developments. Some of Chelmsford's neighbours have significant unmet housing needs. It is unclear how such factors have been considered in determining the housing requirement (Tritton Farming Partnership LLP PSQ25-5672)
- The proposed housing requirement may not stay within 80% as dwelling stock estimates and affordability ratios change. Allocate more housing sites to increase the housing requirement (Gay Bowers Limited PS25-292) to achieve NPPF 2024 levels and increase the housing requirement and buffer. This is expected by recent Written Ministerial Statements (This Land Limited PSQ25-5755)
- Should be planning to meet 100% of the housing requirements and allocating more sites including in Danbury (Landvest Developments Ltd PSQ25-5789)
- Do not object to the quantum of new housing but given the 'built-in' shortfall in housing provision from the transitional arrangements the plan should remove areas from the Green Belt and allocate as safeguarded land for housing delivery after 2041 (Croudace Homes PSQ25-6043)
- The plan's housing requirement may not stay within 80% as dwelling stock estimates and affordability ratios change. Notwithstanding the transitional arrangements, the plan should maximise housing delivery opportunities. Allocate additional and smaller sites including West Chelmsford which are more flexible than larger strategic allocations (Crest Nicholson PSQ25-6076)
- More appropriate and sustainable options to SGS16a and b have been ruled out. The plan has not addressed our previous concerns and is unsound (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6133)
- Policy is not properly justified, effective or represent a positive approach to plan preparation, as other less harmful growth options have not been properly interrogated (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6133)

Review of the plan

- The Council should commit to an early/immediate review of the plan (Martin Grant Homes PSQ25-2609, PS25-147, Bloor Homes (Eastern) PSQ25-6141, Hallam Land Management PSQ25-6382, Crest Nicholson, Dandara Strategic Land, and Taylor Wimpey Strategic Land PS25-326, Higgins Homes PS25-347, Welbeck Strategic Land V Limited PSQ25-3210, Wates Developments Limited PSQ25-5302)

IIA comments

- The full standard method and/or a higher growth scenario needs to be tested in the IIA/plan (Martin Grant Homes PSQ25-2609, PS25-147, (Taylor Wimpey Strategic Land PS25-315, Higgins Homes PS25-347)
- The IIA needs updating to ensure all reasonable alternatives have been assessed (Welbeck Strategic Land V Limited PSQ25-3210)

- Support the IIA conclusion that the proposed housing requirement is an appropriate basis for plan-making in sustainability terms (Hammonds Farm) (Wates Developments and Hammonds Estates LLP PS25-310)
- It is unclear if the IIA has appropriately considered the higher growth option This appears to have been rejected because it results in an 'oversupply' of housing which conflicts with national policy (Crest Nicholson PSQ25-6076, Crest Nicholson, Dandara Strategic Land, and Taylor Wimpey Strategic Land PS25-326)
- The IIA does not appear to have tested an option of extending existing employment areas (Saxtons 4x4 PSQ25-6094)

Employment Requirement

- Should test spatial options in the Green Belt and/or Green Wedge land to address full housing and employment needs including unmet neighbouring council needs (The Bucknell Family PS25-286)
- Plan does not plan for sufficient employment land, allocate sufficient employment sites or align with the evidence base or national policy. The Employment Land Review 2024 Update calculation of employment land requirement should be treated as a minimum (Gearston Ltd PSQ25-3045)
- Plan should commit to an early review to deliver the full objectively assessed housing needs and consequential employment growth requirements. Provide new employment space to match the future growth of the resident workforce in Chelmsford and to reflect the 2024 NPPF local housing need requirements. Consider redeveloping existing established employment sites, such as the BAE site (Rosehart Properties Ltd PSQ25-3182)
- Reliance on Scenario 1 in the Employment Land Reviews, despite a strong office and industrial demand, risks a mismatch between jobs and housing growth. Reassess site allocations and consider other sites including in the Green Wedge. Restricting land release could constrain sustainable growth and infrastructure deficits (Cliffords Group Ltd PSQ25-4958)
- Support for the Employment Land Reviews but demand for logistics development is likely understated so keep the employment quantum as a minimum. The Savills Industrial & Logistical Needs Assessment (March 2022) (submitted alongside the representation) considers amongst other matters there will be future demand from London and the supply of industrial and logistics has been suppressed (Pigeon (Sandon) Ltd PS25-228)
- The identified additional employment floorspace is insufficient to meet the identified needs of the logistics sector in accordance with national policy. There should objectively assess the requirements of the logistics sector across the sub-region. This is expected to increase requirements for logistic space in the plan. Concerns raised over the Employment Land Review including the assumed jobs density (Greystoke CB PSQ25-6084)
- Plan's employment policies are not fully justified. Allocate more employment land including around existing employment areas. Amend the Grey Belt/Green Belt to extend Robjohns Employment Area (Saxtons 4x4 PSQ25-6094)
- The scale of additional employment land provision has not been properly justified, represents a deviation from the Council's evidence base and are over-inflated as there is no overriding quantitative or qualitative need for the

proposed employment floorspace of 162,646sqm and additional employment allocations SGS16a and b (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6133)

- The Employment Land Review shows that the City's employment land needs can be adequately met (with a buffer) by existing commitments / allocations over the plan period. SGS16a and b will result in significant adverse impacts and do not represent the most sustainable growth option. The over-provision of new employment floorspace, which far exceeds historic levels of supply, could saturate the market and dilute demand. Any additional employment land should focus on smaller employment sites, in a range of locations across the City, and include sites within existing built-up areas, where there is already local infrastructure in place to support delivery (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6133)

Gypsy and Traveller and Travelling Showpeople Requirements

- Support approach to meeting identified needs for additional Gypsy, Traveller and Travelling Showpeople accommodation. Continued close and effective working on Gypsy and Traveller accommodation across Essex, through the Essex Planning Officers Association and other strategic planning groups is needed (Brentwood Borough Council PSQ25-6159, Rochford District Council PSQ25-6194)
- Concerns expressed with policy. Acknowledge the GTAA but it is unclear whether the demand for travelling showpeople in the adopted plan and Chelmsford Garden Community DFD has been met. Replacing travelling showpeople provision for gypsy and traveller provision within SGS6 could represent a shortfall in another type of specialist residential accommodation elsewhere (Vistry Group PSQ25-6374)
- Increase the identified unmet need for new permanent plots for Travelling Showpeople from 38 to 41 to reflect the updated GTAA and recent Public Inquiry granting temporary consent for 11 families for 3-years. Allocate land east of Main Road, Broomfield to help provide a 5-year supply of deliverable sites. Object to meeting identified unmet needs through windfalls in Policy DM3 as this is uncertain, and the policy requirements are unworkable (Mr D Bibby and Family and Colleagues PSQ25-6356, PSQ25-6359).

Small Sites Requirement

- Based on a total housing requirement of 22,990, 6.9% of new dwellings could be delivered on small sites - short of the 10% requirement. Self and custom build houses are not within the definition of small sites and small windfall sites cannot be relied upon. Allocate additional small sites including in Little Baddow, Great Leighs and West Hanningfield (Essex Alms Housing PS25-302, PS25-307, PS25-309)
- The plan is not meeting 10% of their housing requirement on small sites and windfall sites are uncertain. More small sites should be allocated including in East Hanningfield (Mr and Mrs B Hearn PS25-171)
- Council should seek to review the approach to small sites given the pressing need for housing and new NPPF targets. The Plan is over reliant on major strategic regeneration and at risk of falling short on housing delivery given

past undersupply. Plan should allocate more smaller scale sites including in Boreham (Urban Provincial PSQ25-4972)

Miscellaneous

- The current approach to defining sustainable locations for development based on settlement boundaries is overly reliant on arbitrary boundaries and a flexible greener outlook could be adopted i.e. walking distance to key services. This would ensure contribution on merit for deliverable well connected sustainable edge of settlement sites including Great Leighs (Mrs Helen Sadler PS25-28, PS25-30, PS25-63).

CCC Response
The Council has co-operated with other bodies on strategic planning matters on an on-going basis as evidenced in the Duty to Co-operate Position Statements (evidence base documents DTC001, DTC002 and DTC005), and Statements of Common Ground including those with adjoining authorities.
At the time the Pre-Submission Consultation was carried out (using the Council's Five-Year Housing Land Supply Methodology - April 2024) the Council could demonstrate a Five-Year Housing Land Supply at the point of submission of the Plan. Following the Pre-Submission Consultation the Council's Five-Year Housing Land Supply (based on the August 2025 Housing Site Schedule) showed that at the point of submission (Years 2 – 6) it was estimated to be 8,010 dwellings. Using the August 2025 Housing Site Schedule, it was estimated that the housing requirement figure for the Five-Year Housing Land Supply calculation would be 1,622 dwellings per annum on submission. This was based on the proposed Housing Requirement figure of 1,210 dwellings per annum, the estimated shortfall in housing completions from the new base period of the emerging Local Plan (1,672 dwellings) and the required 5% buffer to ensure choice and competition in the market for land. Based on these figures this would only be 4.93 years of housing land supply (8,010/1,622) on submission. As a result of this the Council undertook an Additional Site Consultation which seeks to rectify this situation and demonstrate that the Local Plan will meet its Five-Year Housing Land Supply at the point of submission. Using the latest housing supply figure in the April 2026 Housing Site Schedule (8,962), and the updated housing requirement figure (including the actual shortfall of 1,783 dwellings that reflects 407 net new completions in 2025/26), the revised Five-Year Housing Land Supply Calculation including a 5% buffer is 5.45 years (8,962/1,645). The housing requirement in the plan meets at least 80% of the revised standard method housing need in line with the Government's latest plan-making transitional arrangements. This is consistent with the NPPF's objective of preparing and maintaining up to-date plans in order to make consistent provision for housing and other needs. Submission of the plan will be in June 2026 in accordance with the updated Local Development Scheme, October 2025. Submission is later than previously envisaged given the high number of consultation responses received which took longer than expected to process and analyse and to allow time for the Additional Sites Consultation to be undertaken. The Government deadline for plan submission under the new plan-making transitional requirements has also been pushed back to June 2026, allowing more time to prepare all submission documentation.

It is appropriate for the Council to elect to plan for higher growth than the 2023 Standard Method figure, given that the NPPF 2023 Paragraph 61 and PPG (Paragraph 2a-040-20241212) define the housing requirement as the “minimum number of homes a plan needs to provide”, which may exceed local housing need if appropriate. The Council’s decision to proceed with the transition arrangements is consistent with the NPPF’s objective of preparing and maintaining up to-date plans in order to make consistent provision for housing and other needs; the Government’s emphasis on plan-led growth and seeking universal Local Plan coverage.
Reallocating the supply buffer and undertaking an Additional Site Consultation to be able to demonstrate that we can achieve a revised Housing Requirement that meets the NPPF transition arrangements is pragmatic and appropriate as the Council had already prepared and consulted on an evidence base to support a spatial strategy of this quantum and has updated its housing evidence to support the revised housing requirement.
National Planning Policy Framework cannot be disregarded. This states that to determine the minimum number of homes needed, strategic housing policies should be informed by a local housing needs assessment conducted using the standard method. The Strategic Housing Needs Assessment Addendum Report (November 2024) reviews the implications of moving housing delivery to 1,206 homes pa as does the IIA.
As set out in Policy S13 a full or focused formal review of the Local Plan will commence two years after its adoption in line with national planning policy.
A range of development quantums, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Pre-Submission Spatial Strategy and Strategic Sites Topic Paper, Preferred Options Local Plan and the IIA. Responses to the IIA Regulation 19 representations are given in the Pre-Submission IIA Feedback Report.
There is nothing in NPPF that states that we need to meet the proportionate needs of existing settlements, and the Spatial Strategy determines how best to meet the Local Housing Need identified using the Standard Method.
The Pre-Submission plan met the 10% small sites requirement through a combination of windfall and self and custom build houses. Whilst the Additional Sites Consultation might reduce the proportion of allocated small sites because of the increase in the supply overall, the proportion of small sites will continue to exceed the 10% when combined with self and custom build houses.
It is acknowledged that flows at Rushes Lock are likely to increase in future as a result of climate change. Various steps are taken in the plan to reduce flood risk in general to mitigate the impacts of new development. This includes Policy DM18 which requires all new development to demonstrate that the site is safe from all types of flooding and does not worsen flood risk elsewhere. All major development is also required to incorporate integrated water management measures to reduce surface water runoff.
Policy is informed by the Chelmsford Employment Land Review (including the 2023 Report and Focused Update 2024) which considers the most up-to-date assumptions, guidance and data. The ELR considers the indigenous employment needs arising in Chelmsford and – where relevant – any needs identified from

across the relevant Functional Economic Market Area. The approach to the ELR aligns with the PPG and represents an appropriate and proportionate basis for planning for longer-term employment needs including in relation to B8 workforce jobs density. The plan exceeds the minimum employment requirements in the ELR over the plan period through flexible site allocations across a range of different locations and sizes alongside existing commitments. The use of 'around' employment floorspace figures in specific site allocation policies allows for an appropriate degree of flexibility in provision.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process; and can meet its development requirements without needing to undertake a Green Wedge review. This approach accords with the evidence base.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process; and can meet its development requirements without needing to undertake a Green Belt review. This approach accords with National Planning Guidance.
The Settlement Hierarchy is just one of several considerations for the Spatial Strategy, along with the Vision and Spatial Principles, and is considered to be a robust approach.
Windfall development comprises sites that have unexpectedly become available over time, and which were not anticipated by the council as part of a Local Plan. These sites are granted planning permission in accordance with adopted local and national policies and contribute towards housing figures.
Para 75 of the NPPF directs Local Planning Authorities to consider historic windfall delivery rates. The Pre-Submission Housing Topic Paper shows trends over a considerable length of time (12 years at the Pre-Submission Regulation 19 consultation). Average rates assumed at Pre-Submission stage (175) were below the actual average (196) so have been increased to 195 per annum in the Additional Sites Consultation as justified by historic windfall completions.
With the inclusion of the sites proposed by the Additional Sites Consultation a 5% buffer on the proposed new housing requirement will be shown in the 5 year land supply at submission although not a requirement of the 2023 NPPF which the plan will be considered against.
There is no national requirement for a buffer to be allocated in the supply trajectory as the NPPF manages risks to supply through the need to maintain a 5 year land supply and the Housing Delivery Test. Also Para 78c of the NPPF 2024 states that for decision-making a 20% buffer is applied to the 5 year supply of specific deliverable sites where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of the Framework and whose annual average housing requirement is 80% or less of the most up to date local housing need figure calculated using the standard method.
The timing of new supply which include a mix of site typologies utilises information from developers and is explained further in the Housing Pre-Submission Topic Paper and will be updated in the Submission Housing Topic Paper to reflect the latest Housing Site Schedule and the Additional Sites Consultation Document.
The Gypsy and Traveller Accommodation Assessment published in September 2024 identified the need for new permanent pitches against the then relevant Planning Policy for Traveller Sites (PPTS). The Assessment is considered appropriate and robust. The PPTS was amended in December 2024 and the impact of this is reviewed in the Submission Housing Topic Paper. We conducted

a specific 'Call For Sites' for Gypsies &Travellers and this only elicited two submissions both of which now have planning permission. All new proposed allocations are therefore both evidenced and justified.
At the time of the Gypsy and Traveller Accommodation Assessment (GTAA), only 8 plots had been established on land east of Main Road, Broomfield and the need associated with these plots was identified in the assessment. The 5-year supply of Travelling Showpeople Sites will be updated to reflect any new resolutions / grants of planning permission since the Pre-Submission (Regulation 19) Local Plan consultation and commentary on the subsequent impact on the need for Travelling Showpeople plots provided in the Submission Housing Topic Paper. Policies DM1 and DM3 enable the provision of windfall sites for Travelling Showpeople (and Gypsy and Travellers) where not met through allocations of land for those households that remain 'undetermined' in the GTAA following changes to the Annex 1 of the December 2024 PPTS. A response to the critique of Development Management Policy DM3 is provided against this policy.

Para 6.20 and Strategic Policy S7 – The Spatial Strategy

Consultation point	**Total number of responses**
Para 6.20 and Strategic Policy S7 – The Spatial Strategy	92

Summary of Representations – main issues and requested changes:

- Support expressed for the settlement hierarchy, but it is unclear how it is intended to be used by decision-makers. Move the table to the reasoned justification text if it simply explains the distribution of growth, and increase the number of new homes to be delivered through alternative means – see the emerging West Suffolk Local Plan as an example (This Land Limited PSQ25-5759, Miscoe Enterprises Ltd PSQ25-2990, A.G. & P.W.H. Speakman PSQ25-3040, Weal Properties Ltd PSQ25-3072, Mrs R Armstrong and Mr B Howard Ms Becky Armstrong PSQ25-3077, Gearston Ltd PSQ25-3141, Cliffords Group Ltd, PSQ25-4966, The Bucknell Family, PS25-289, Crest Nicholson PSQ25-6079, Taylor Wimpey Strategic Land PS25-316, Pigeon (Sandon) Ltd PS25-230, Crest, Dandara, and Taylor Wimpey Strategic Land PS25-328)
- Support the settlement hierarchy and that Great Baddow is part of Chelmsford Urban Area (Hill Residential Ltd PS25-382)
- Support the identification of Galleywood as a Key Service Settlement (Croudace Homes PSQ25-6048)
- Chelmsford is worthy of its own separate classification in the Settlement Hierarchy (Dominus Chelmsford Limited PSQ25-6204, Higgins Homes PS25-364, Crest Nicholson PSQ25-6079, The Bucknell Family PS25-289, Taylor Wimpey Strategic Land PS25-316)
- If the settlement hierarchy remains in policy, reword to state that 'Development will be brought forward in accordance with the Spatial Strategy Development Locations and Allocations, as well as through development within and adjoining existing settlements and in sustainable locations along

existing transport corridors having regard to other policies within this Plan and the NPPF, read as a whole.' (The Bucknell Family, PS25-289, Crest, Dandara, and Taylor Wimpey Strategic Land PS25-328)

- The settlement hierarchy is not a robust basis for identifying sustainable development locations. Amend to 'development at settlements outside the Green Belt, where this would support existing or new local services to meet the needs of that specific community' (Broomfield Parish Council PSQ25-5151)
- Settlement Hierarchy should remove the distinction in relation the Green Belt (Higgins Group PSQ25-5625, PSQ25-5631)
- Support expressed for the spatial strategy (Anglian Water Services Ltd PSQ25-6396)
- Support significant growth to North-East Chelmsford (Cliffords Group Ltd PSQ25-4966, Gearston Ltd PSQ25-3141, Halley Development PSQ25-3087, PSQ25-5045)
- Support expressed for the spatial strategy but need to consider the wider impacts of the planning growth on neighbouring authority areas, including Brentwood and Rochford Council. CCC should satisfy itself and the Planning Inspectorate that it has considered all reasonable options, including the Green Belt (Brentwood Borough Council PSQ25-6158, Rochford District Council PSQ25-6193)
- Broad support expressed for the spatial strategy which is supported by the plan evidence base including the IIA. Support SGS16a. Documentation submitted alongside our representations demonstrate that SGS16a is deliverable and that there are no fundamental barriers to bringing it forward. The plan is not unduly reliant on large scale garden community developments (SGS6 and 16a will deliver less than half of Chelmsford's total housing supply) and is supported by a wide range of sites at other scales (Wates Developments and Hammonds Estates LLP PS25-313)
- Support the principle of providing Gypsy and Traveller and Travelling Showpeople accommodation on large strategic development allocations, but the proposed site distribution is unfair and unbalanced between the garden communities. Amend this policy (and site allocation policies) to remove 13 Travelling Showpeople pitches from Site SGS16a and reinstate them at SGS6 as this site has sufficient land and access characteristics to accommodate them (Wates Developments and Hammonds Estates LLP PS25-313)
- The submitted Agricultural Land Classification survey and comparative appraisal show that for the Council to meet its development needs, the loss of BMV agricultural land is unavoidable, and that alternative sites to Hammonds Farm would have similar impacts (Wates Developments and Hammonds Estates LLP PS25-313, PS25-319)
- Support the spatial strategy for employment but question limiting employment uses to B2 and B8 of the Use Classes Order. Amend SGS15 to support development in Use Classes E(g)(i-ii), B2 and/or B8 (CJH Farming Ltd PS25-287)
- For clarity amend policy to confirm the numbers within the table are approximates and should not be treated as ceilings. Remove reference to all strategic growth sites requiring a masterplan and instead address on a site-

by-site basis, in the relevant site-specific policies (CJH Farming Ltd PS25-287, Pigeon (Sandon) Ltd PS25-230)

- Support SGS16b (Pigeon (Sandon) Ltd PS25-230)
- Identify the further expansion of Chelmsford Garden Community now or for growth beyond the current plan period to boost housing supply, to help address any unmet needs from elsewhere and to help deliver the full CNEB (Hallam Land Management PSQ25-6375)
- Although the residential strategic growth sites will need to provide specialist housing this will unlikely meet needs in full, so additional allocations are needed (Mrs Mary Rance PSQ25-6498)
- Objections/concerns expressed to the spatial strategy. Examples of reasons put forward include that there has been a failure to test all reasonable alternative spatial options to support higher housing delivery and meet unmet needs from neighbouring areas; too much reliance on the delivery of strategic sites/large-scale garden communities; concerns with proposed allocated sites including their delivery rates, concerns around achieving/maintaining a 5-year supply of homes and, the need to support rural communities and provide an adequate supply buffer. Plan should allocate additional sites including within the Green Belt and/or Green Wedge, smaller-sites and in all/more settlements in the hierarchy (Hill Residential Ltd PSQ25-5194, Mrs R Armstrong and Mr B Howard Ms Becky Armstrong PSQ25-3077, Miscoe Enterprises Ltd PSQ25-2990, Cliffords Group Ltd PSQ25-3004, PSQ25-4966, Weal Properties Ltd PSQ25-3072, A.G. & P.W.H. Speakman PSQ25-3040, Martin Grant Homes PS25-148 and PSQ25-2615, M Scott Properties Ltd PSQ25-6023/6026, Tritton Farming Partnership LLP PSQ25-5679, PSQ25-5685, W. D. Smith & Son PSQ25-6019, This Land Limited PSQ25-5759, Obsidian PSQ25-5937, Richborough PS25-175, Dandara Eastern PSQ25-6213, Bloor Homes (Eastern) PSQ25-6142, Gladman Developments Ltd PSQ25-6314, Croudace Homes PS25-358)
- The Council has not adequately tested alternative options for growth, and it is unclear why other reasonable options have been discounted, including Northwest Chelmsford. Disagree with IIA assessment/rejection of West and Northwest Chelmsford which also scores better in the SHELAA. The Council has discounted all Green Belt sites as a matter of principle, although some could represent more sustainable options for development than SGS16a – a Green Belt Review is required. There is no overriding need for the additional employment allocations at SGS16a and b which will have significant adverse impacts – delete both from the plan (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6137)
- Allocate additional sites across a wider variety of sites sizes to replace or supplement the major strategic allocations. Alternatively, identify land as a ‘reserve’ site including in Rettendon (Croudace Homes PS25-358)
- There are enough sites for Chelmsford to meet the higher growth scenario, including in South Woodham Ferrers. Plan is overly reliant on SGS16a which is questionable based on the evidence base, planning logic and deliverability (Dandara Eastern PSQ25-6213)
- There should be higher housing growth for Danbury (Martin Grant Homes, PS25-148 and PSQ25-2615); proportionate to the new housing requirement (A.G. & P.W.H. Speakman PSQ25-3040)

- Follow a twinned approach to allocating sites in Neighbourhood Plan areas, whereby the Local Plan and the Neighbourhood Plan's allocate sites to ensure houses come forward to help meet local housing needs within the plan period (Richborough PS25-175)
- Delete requirement for a Gypsy and Traveller site at SGS6 – this is not properly evidenced, is contrary to the approved Development Framework Document (DFD) and could result in a shortfall is another type of specialist residential accommodation elsewhere (Chelmsford Garden Community Consortium PSQ25-6339, PSQ25-6345, PSQ25-6354, Vistry Group PSQ25-6376)
- Concerns that the spatial strategy will not achieve at least 10% (2,229 homes) of its housing requirement on sites of less than one hectare in size (Home Builders Federation PSQ25-5473)
- Allocate more land to reinstate the previous housing supply buffer and meet housing requirements in full (Obsidian PSQ25-5937)
- Undertake a full Green Belt review and identify development in the Green Belt. Examples of reasons put forward include to meet housing needs in full, reduce reliance on the garden communities, provide an adequate housing supply buffer and provide a more even distribution of growth across the District (Rosehart Properties Ltd PSQ25-3189, M Scott Properties Ltd PSQ25-6023, PSQ25-6026, Taylor Wimpey Strategic Land PSQ25-5454, Obsidian PSQ25-5937, W. D. Smith & Son PSQ25-6019, Catesby Land and Planning PSQ25-5606, Higgins Group PSQ25-5625, PSQ25-5631, Vistry PS25-304, Barratt David Wilson – Eastern Counties (BDW) PSQ25-5783)
- Council needs to identify 'Grey Belt' sites and consider reasonable alternatives to meet the new standard method requirements and consequential employment growth (Rosehart Properties Ltd PSQ25-3189)
- Council needs to undertake a Green Wedge Review. Without this, the Green Wedge designation cannot be used to reject potential development sites (Mr J Bolingbroke PSQ25-5524)
- Strategic growth areas comprise 70% of the total housing supply and the allocated sites are not delivering as projected. Allocate more proportionate sites to provide some contingency including in Broomfield (Obsidian Strategic Asset Management Ltd PSQ25-5707)
- Number of dwellings for Danbury should be proportionally increased to reflect the need to plan for the Council's new housing requirements (Landvest Developments Ltd PSQ25-5794)
- The spatial strategy has not considered all opportunities to expand the Widford/Robjohns Employment Area Industrial Estate or far enough to provide economic space. The employment and sustainability policies are potentially incongruous. Amend the Green Wedge/Belt to extend Robjohns Employment Area (Saxtons 4x4 PSQ25-6099, PSQ25-6102)
- Policy should be clear that the housing figures are a minimum to be consistent with Strategic Policy 6 and para 61 of the NPPF (2024) to ensure the efficient use of allocated housing land (Vistry Group PS25-137)
- Support additional growth in line with the NPPF targets given the housing delivery targets fall short of the ambitions in the NPPF 2024 (Halley Development PSQ25-3087, PSQ25-5045)

- Add an additional table beneath the Growth Areas Tables to identify safeguarded land including in the Green Belt that could come forward after 2041 or where there is an early review to ensure a more balanced, equitable distribution of new housing and to meet future development needs (Croudace Homes PSQ25-6044, PSQ25-48).
- Allocate the Marriage Mill Cranham Road site as a new development/ employment allocation in S7 (W & H Marriage & Sons Limited PSQ25-6055)
- We need to be consulted for any works in the vicinity of the Exolum pipeline (map attached to representation) (Exolum Pipeline System Ltd PSQ25-480)
- The Strategic Housing Needs Assessment falls short of detailing how the market for co-living accommodate will be met. Allocate a co-living site in Chelmsford City Centre (Highgate Capital Limited PSQ25-5332)
- Amend policy to also focus new growth to accessible locations on the strategic road network to meet the needs of the logistics sector including land at Junction 17 A12. SGS16a and b are too small to meet the needs of the logistics sector (Greystoke PSQ25-6074)
- Changes to the strategic road network should consider potential impacts on the wider network including London's eastern corridor. To avoid reliance on A12 access into London, Growth Area 3 could explicitly refer to strategic connections to wider employment opportunities for Chelmsford's workforce who work in London. Expanded highways should provide improved infrastructure for sustainable modes such as bus lanes (Transport for London PSQ25-6500)
- The new housing figures appear speculative. Hammonds Farm is contrary to Strategic Priority 3 and other land should be released for housing, preferably inside the A12. Windfall sites should be allocated now if the Council is certain of them (J & T Wardrop and the Wardrop Trust PS25-107, PS25-108, PS25-109)
- Quantum allocated within the Chelmsford Urban Area is too low and the plan should be aiming for 4,000 new homes (Dominus Chelmsford Limited PSQ25-6204)
- The current approach to defining sustainable locations for development based on settlement boundaries is overly reliant on arbitrary boundaries and a flexible greener outlook could be adopted i.e. walking distance to key services. This would ensure contribution on merit for deliverable well connected sustainable edge of settlement sites including Great Leighs (Mrs Helen Sadler PS25-28, PS25-64, PS25-39, PS25-54, PS25-55, PS25-57)
- Settlement boundaries must be logical, easily identifiable and follow property boundaries, permanent features and encompass suitable undeveloped sites and historical use is acknowledged (Mrs Helen Sadler PS25-39, PS25-54, PS25-55, PS25-57).
- Chelmsford water recycling centre (WRC) has sufficient dry weather flow (DWF) headroom to accommodate the planned growth in and around the city (Anglian Water Services Ltd PSQ25-6396)
- The Water Cycle Study Stage 2 (WCS) has identified that the current consented Dry Weather Flow (DWF) will be exceeded at the SWF WRC (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 Anglian

Water PR24 Business Plan identifies a scheme at SWF WRC for AMP8 to enable growth to come forward (Anglian Water Services Ltd PSQ25-6396)

- There are some errors in 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 (Anglian Water Services Ltd PSQ25-6396)
- Engage Essex Police to ensure new infrastructure during construction and the final building stage are safe and secure and do not compromise Emergency Service Access (Essex Police PSQ25-2656)
- Support the settlement hierarchy, but allocate more growth to Bicknacre and test this as a reasonable alternative (Welbeck Strategic Land V Limited, PSQ25-3210, PSQ25-3215)
- Reject findings of the IIA including the conclusions of Option 2c and Option 3 in relation to land at West Chelmsford. Consider a potential spatial strategy with residential-led development at West Chelmsford along with employment development at Location 16b (not just Howe Green) and / or promoted sites as potential options (Crest, Dandara, and Taylor Wimpey Strategic Land PS25-328)
- Rejection of West Chelmsford in the IIA is not justified. Should assess an option based on smaller sites in West Chelmsford coming forward individually (Crest Nicholson PSQ25-6079) The Bucknell Family PS25-289, Taylor Wimpey Strategic Land PS25-316)
- Reasons for rejecting Option 2b in the IIA and the SHELAA conclusions have failed to have regard to our previously submitted technical evidence. The plan fails to provide a robust housing need and supply that addresses duty to cooperate requirements (Strutt and Parker (Farms) Limited PSQ25-5512, PSQ25-5520)
- SGS16a is not justified in favour of other options in West of Chelmsford. The reasons for rejecting this spatial option in the IIA are disputed including connectivity to the Chelmsford's urban area (Dandara PSQ25-6016, PSQ25-6017)
- Reasons for rejecting strategic growth at Chatham Green in the IIA are not applicable to Land East of Chatham Green e.g. isolated from the strategic highway network and limited capacity at the wastewater recycling facilities serving the area (Tritton Farming Partnership LLP PSQ25-5679, PSQ25-5685)
- The IIA must test growth in Boreham as a reasonable alternative and allocate development here. Reasons include because it is a Key Service Settlement and in proximity to other strategic development (Wates Developments Limited PSQ25-5303, PSQ25-5304, PSQ25-5313, This Land Limited PSQ25-5759, Gearston Ltd PSQ25-3141, Urban Provincial PSQ25-4975, Gladman Developments Ltd PSQ25-6314, Gladman Developments Ltd PSQ25-6314)
- The emerging Boreham Neighbourhood Plan infers that any future development will need to be to the east of the settlement (Wates Developments Limited PSQ25-5313)
- There is no evidence to support a lack of local education capacity as a key issue facing development in Boreham (Urban Provincial, PSQ25-4975)

- Development at Rettendon, Howe Green and East Hanningfield collectively has never been tested through the IIA (Gladman Developments Ltd PSQ25-6314
- Discounting a 'high growth' scenario based only on consideration of one selection of sites is unjustified. Other sites could be tested as a 'high growth' as a reasonable alternative to the spatial strategy (Martin Grant Homes PSQ25-2615)
- Need to explain why the viability assessment supporting the SHELAA (Part 5 of 9) makes different cost assumptions to those set out in 2023 viability assessment (Home Builders Federation PSQ25-5473)
- Amend para 6.26 to refer to healthcare 'provision with some additional provision for emergency services to meet mandated/target response times.' (East of England Ambulance Service NHS Trust PSQ25-5241)
- Para 6.27 - exclude reference to the Green Belt and allow growth in Green Belt Service Settlements to help housing affordability, increase flexibility in housing supply and support rural sustainability (M Scott Properties Ltd PSQ25-6025)
- Sandford Mill - support policy and the opportunity for a mixed-use development incorporating leisure in conjunction with use of the Chelmer & Blackwater Navigation. This should include the provision of Navigation mooring, launching and dry dock facilities in a marina basin re-purposing the Settled Water Tanks together with re-use of the heritage Filter House, and a Visitor Centre for the new Country Parks (Essex Waterways Ltd PSQ25-5207)
- Sandford Mill – the vehicular access to the Manor Farm development is from the A414 and should be extended to Sandford Mill. The road capacity from the north will be unsuitable for the vehicles expected to use the proposed new facilities and this should be reflected throughout the plan (Chelmsford Rivers and Canal Link group (CRACL) PS25-277)
- ARU Writtle - support SPA6 in principle but object to any future expansion being dependent on an approved masterplan – delete such a reference from para 6.55 (ARU PSQ25-6219)
- Refusal to undertaking a Green Belt Review and rushing through a flawed Local Plan under the Transitional Arrangements will result in a skewed and unsustainable growth strategy that fails to meet housing needs in full and an over-reliance on large Garden Communities that will take significant time and infrastructure to deliver.
- Concerns over why the proposed warehouse development at Howe Green has been considered
- Alternative strategies and new/expanded site allocations promoted by landowners/developers
- Various site promoters question the SHELAA assessment of their sites.

CCC Response
The policy shows a hierarchy for which settlements are sustainable and therefore suitable to accommodate future growth. The Spatial Strategy table sets out the specific development allocations whilst the Housing Supply is dealt with separately in Policy S6 and at Table 1. Although this approach may differ to the emerging West Suffolk Local Plan it is appropriate.

Delivering homes by alternative means is not an appropriate position or supported as a policy direction as the council intends to meet identified needs through the site allocations.
Minor modifications will be proposed to the Spatial Strategy table to update numbers of new homes to reflect the most recent housing site schedule ahead of submission (April 2026).
The Review of the Local Plan is proceeding using the transitional arrangements. These are designed for authorities such as Chelmsford that are well advanced with plan preparation. Submission of the plan will be in June 2026 in accordance with the updated Local Development Scheme, October 2025. This will enable the Council to fully consider the outcomes of the Regulation 19 consultations.
As set out in Policy S13 a full or focused formal review of the Local Plan will commence two years after its adoption in line with national planning policy.
A range of development quantums, broad distributions of development and site options available within the district have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy and Strategic Sites Pre-Submission Topic Paper, Preferred Options Local Plan and the IIA. Responses to the IIA Regulation 19 representations are given in the Pre-Submission IIA Feedback Report.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process; and can meet its development requirements without needing to undertake a Green Belt review. This approach accords with the evidence base.
The correct figure of 767 m3/day has been used in the WCS calculations for Great Leighs WRC and therefore the conclusions are unchanged.
The Green Wedge is a locally important designation. Changes to the Green Wedge boundaries to allow development growth has been discounted as there is sufficient and suitable land elsewhere to meet development needs in a sustainable way. No Green Wedge Review is required.
The Settlement Hierarchy is just one of several considerations for the Spatial Strategy, along with the Vision and Spatial Principles, and is considered to be a robust approach.
There is nothing in NPPF that states that we need to meet the proportionate needs of existing settlements, and the Spatial Strategy determines how best to meet the Local Housing Need identified using the Standard Method.
At the time the Pre-Submission Consultation was carried out (using the Council's Five-Year Housing Land Supply Methodology - April 2024) the Council could demonstrate a Five-Year Housing Land Supply at the point of submission of the Plan. Following the Pre-Submission Consultation the Council's Five-Year Housing Land Supply (based on the August 2025 Housing Site Schedule) showed that at the point of submission (Years 2 – 6) it was estimated to be 8,010 dwellings. Using the August 2025 Housing Site Schedule, it was estimated that the housing requirement figure for the Five-Year Housing Land Supply calculation would be 1,622 dwellings per annum on submission. This was based on the proposed Housing Requirement figure of 1,210 dwellings per annum, the estimated shortfall in housing completions from the new base period of the emerging Local Plan (1,672 dwellings) and the required 5% buffer to ensure choice and competition in the market for land. Based on these figures this would only be 4.93 years of

housing land supply (8,010/1,622) on submission. As a result of this the Council undertook an Additional Site Consultation which seeks to rectify this situation and demonstrate that the Local Plan will meet its Five-Year Housing Land Supply at the point of submission. Using the latest housing supply figure in the April 2026 Housing Site Schedule (8,962), and the updated housing requirement figure (including the actual shortfall of 1,783 dwellings that reflects 407 net new completions in 2025/26), the revised Five-Year Housing Land Supply Calculation including a 5% buffer is 5.45 years (8,962/1,645). The housing requirement in the plan meets at least 80% of the revised standard method housing need in line with the Government's latest plan-making transitional arrangements. This is consistent with the NPPF's objective of preparing and maintaining up to-date plans in order to make consistent provision for housing and other needs. The housing supply includes a small supply buffer although there is no national requirement for a buffer to be allocated in the supply trajectory and the NPPF manages risks to supply through the need to maintain a 5 year land supply and the Housing Delivery Test. Housing figures are 'around' and allow for more units to come forward if sites can accommodate them in a sustainable manner.
The Housing Trajectory and timings within it are considered deliverable as established through the Council's Five Year Housing Land Supply Methodology. The Trajectory is updated annually, and the Pre-Submission Local Plan uses the latest available Housing Site Schedule (April 2024). Minor modifications will be proposed to the Trajectory to reflect the latest published Housing Site Schedule ahead of submission (April 2026). A number of Strategic Growth Sites rolled forward from the adopted Local Plan including greenfield sites have planning permission or resolutions to grant planning permission including North of South Woodham Ferrers, North of Broomfield and North East Chelmsford.
The site allocations, with the addition of existing permissions and windfall sites as set out in the Council's Housing Site Schedule, creates a good range of site sizes to assist in delivery of sites to meet housing needs over the Plan period.
The 'small sites' (under 1ha) are an important part of the Plan to ensure delivery of a variety of sites in a timely manner, and to meet NPPF requirements to provide 10% of small sites.
There is no requirement or local need for the Plan to include a co-living policy. However, a Planning Advice Note was adopted by the Council in July 2025.
Policy is informed by the Employment Land Review 2023 and Focused Update 2024 which considers the most up-to-date assumptions and data regarding future economic growth prospects for Chelmsford between 2022 and 2041. The plan exceeds the minimum employment requirements over the plan period through flexible site allocations across a range of different locations and sizes alongside existing commitments. The use of 'around' employment floorspace figures in specific site allocation policies allows for an appropriate degree of flexibility in provision. DM4 protects, and allows for expansion of, existing employment uses – the Plan should be read a whole, so it is not necessary to repeat in Policy S7.
Policy S8 includes B8 development as stated in reasoned justification – the Plan should be read a whole, so it is not necessary to repeat in Policy S7.
Suitable brownfield sites have been allocated within the Urban Area. There are not sufficient brownfield sites to meet all of the Local Plan's development requirements so greenfield sites must be allocated.
The Council's Masterplan Procedure (October 2025) has been updated to cover three Masterplan routes, including planning/site briefs for smaller, less constrained

sites. Site policies will be updated to reflect the relevant route for each site but the continued requirement for Masterplans for strategic sites and Special Policy Areas will ensure that they satisfy the requirements of their respective plan policies. This can include delivery of all necessary infrastructure and ensuring that new development is delivered as part of a cohesive approach.
Policies DM8 and DM11 provide support for the growth and expansion of rural businesses – no need to add further details to Strategic Policies.
The SHELAA has been updated following the Pre-Submission Local Plan consultation and any appropriate changes or updates have been made.
See relevant site allocation policies for responses to site specific comments.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.
The windfall allowance is supported by the Housing Windfall Assessment April 2024 and 2025. Para 75 of the NPPF (December 2024) allows local planning authorities to make an allowance for windfall sites. Windfall development comprises sites that have unexpectedly become available over time, and which were not anticipated by the council as part of a Local Plan. These sites are granted planning permission in accordance with adopted local and national policies and contribute towards housing figures.
The intention is for most visitors to Sandford Mill to park in the country park car park south of the Navigation and access the site via a foot/cycle bridge. Details of access for commercial vehicles is part of further discussion relating to a current planning application for Site 3a.
The plan can meet the 10% small sites requirement through a combination of windfall and self and custom build houses.
The Gypsy and Traveller Accommodation Assessment published in September 2024 identified the need for new permanent pitches and plots against the then relevant Planning Policy for Traveller Sites (PPTS). The Assessment is considered appropriate and robust. The PPTS was amended in December 2024 and the impact of this is reviewed in the Submission Housing Topic Paper. We conducted a specific 'Call For Sites' for Gypsies &Travellers and this only elicited two submissions both of which now have planning permission. All new proposed allocations for Gypsy and Traveller and Travelling Showpeople sites are both evidenced and justified.

Strategic Policy S8 – Delivering Economic Growth

Consultation point	**Total number of responses**
Strategic Policy S8 – Delivering Economic Growth	6

Summary of Representations – main issues and requested changes:

- Support policy and the priority to use previously developed land in sustainable locations and to focus on locations well-served by active and sustainable travel modes and existing or planned public transport provision. Allocate the

former BAE site which is considered Grey Belt land (Rosehart Properties Ltd PSQ25-5301)

- Support in general but propose that the Cranham Road site be allocated as a rural employment area, or as an extension to Drakes Lane Employment Policy or as a Special Policy Area. The site has extant planning permission for employment development and will contribute towards the local economy (W & H Marriage & Sons Limited PSQ25-6059)
- Support expressed for policy but amend to identify logistics as one of the sectors that the new Local Plan will seek to nurture and grow (Pigeon (Sandon) Ltd PS25-232)
- Amend policy to include reference to nurturing and growing the logistics sector and to state that other employment will be acceptable in other locations beyond the allocations if there is a demonstrable unmet need arising during plan period (Greystoke, PSQ25-6074)
- Amend the 6th bullet point to include south of Chelmsford to be consistent with the spatial strategy and to meet the required increase in logistics space (Greystoke PSQ25-6074)
- Correct para 6.61 to refer to the Planning 'Obligations' SPD and to delete the date of the ECC Developers Guide as this will change over the life of the plan (Essex County Council, PS25-203)
- Plan has not properly considered all opportunities including an extension to Robjohns Employment Area or go far enough to provide key economic space in sustainable locations. Alter the Green Wedge/Belt to enlarge Robjohns Employment Area (Saxtons 4x4 PSQ25-6102).

CCC Response
Minor modifications will be proposed to para 6.61 to correctly reference the Planning 'Obligations' SPD and to delete the date of the ECC Developers Guide.
The policy includes B8 development as stated in reasoned justification – no further change considered necessary.
A range of development quantums, broad distributions of development and site options available within the district have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy and Strategic Sites Pre-Submission Topic Paper, Preferred Options Local Plan and the IIA. Responses to the IIA Regulation 19 representations are given in the Pre-Submission IIA Feedback Report.
Development growth in the Green Belt has been discounted as there is sufficient and suitable land is available outside the Green Belt to meet the development needs in a sustainable way. A Green Belt Review is not required.
The Green Wedge is a locally important designation. Changes to the Green Wedge boundaries to allow development growth has been discounted as there is sufficient and suitable land elsewhere to meet development needs in a sustainable way. No Green Wedge Review is required.
The plan allocates a range of employment sites to meet the employment floorspace requirements in Policy S6 and to allow for a range of different employment uses to come forward, where appropriate – no further modifications required.

A range of alternative development sites have been considered and rejected when developing the Spatial Strategy. One employment site is proposed for expansion in the Focused Consultation Additional Sites Document. More information is set out in the Pre-Submission Spatial Strategy and Strategic Sites Topic Paper, Preferred Options Local Plan and Focused Consultation Additional Sites Document.

Strategic Policy S16 – Connectivity and Travel

Consultation point	**Total number of responses**
Strategic Policy S16 – Connectivity and Travel	10

Summary of Representations – main issues and requested changes:

- Support for the policy as it would accord with Sport England's Uniting the Movement Strategy and Active Design Guidance (Sport England PS25-81)
- Support for the commitment to creating high quality, sustainable places which promote connectivity for all, especially that all new cycle and walking routes are designed to be safe and secure, and do not promote the fear of crime (Essex Police PSQ25-2661)
- Supportive of sustainable communities promoting a modal shift to active and sustainable modes of transport (Daniel James Developments PSQ25-3057)
- Significant cross-boundary engagement has been undertaken through-out the preparation of the Local Plan, effectively addressing the requirements of Duty to Co-operate. Would emphasise the importance of ongoing and meaningful collaboration between the local authorities in helping to address aspects across all identified strategic priorities, particularly in the context of infrastructure (Brentwood Borough Council PSQ25-6161, Rochford District Council PSQ25-6196)
- Broadly supportive of the policy and the wider sustainable travel strategy but emphasise the importance of ensuring the impacts of growth on sustainable transport networks are carefully considered and mitigated. This will require positive and constructive engagement between Councils to consider how transformational changes to travel patterns, and area wide modal shift, can be successfully delivered through a joined-up and strategic approach (Brentwood Borough Council PSQ25-6161, Rochford District Council PSQ25-6196)
- Improvements to active travel within Chelmsford City boundaries are considered beyond the Chelmsford's own LCWIP, which focuses largely on the urban area of Chelmsford. It should be recognised that the boundaries of Chelmsford's administrative area extend far beyond the city itself, and that active travel has a place for both intra- and inter-borough journeys. Alignment with ECC's County-wide LCWIP proposals and emerging proposals in neighbouring districts and boroughs should be sought and opportunities for joint working pursued (Brentwood Borough Council PSQ25-6161, Rochford District Council PSQ25-6196)
- Policy should recognise that due to the specific locational needs of the logistics sector, as outlined in PPG, the walkable neighbourhood principles may not always be achievable. The policy should be revised to state that

walkable neighbourhood principles within developments area should be achieved where appropriate (Greystoke CB PSQ25-6083)

- There is no evidence supplied to justify why it is considered that a 1,000 sqm non-residential development can reasonably secure the commitments of paragraph d) of policy S16, whilst this is only considered necessary for a far more substantial 100 dwelling development (i.e. ten times the scale of the major development definition). It should be increased to 10,000 sqm (Anglia Ruskin University PSQ25-6215)
- Part A requires caveats as to the extent of its applicability, by reference to scale/type of application and relevance to the scheme proposed (Vistry Group PS25-139)
- The wording "prioritise and maximise" should be deleted, as these provide unreasonable and inappropriate requirements for new development, and are not appropriate terms for use in development management policies (Vistry Group PS25-139)
- The requirement in Part B for new development to achieve a "significant" shift in mode share is imprecise. The scale of shift required will depend on the transportation impacts of the proposed development in question and is a matter to be determined in that context (Vistry Group PS25-139).

CCC Response
Request for continued engagement with neighbouring authorities is welcomed.
The policy is a strategic policy and is applicable to all forms of new development – no further change considered necessary.
The requirement in Part B for new development to achieve a "significant" modal shift is defined within the reasoned justification – no further change considered necessary.
The definition and thresholds for major and strategic development in the policy are appropriate – no further change considered necessary to this policy. Minor modifications will be proposed throughout other areas of the plan to ensure consistency with the definition of what strategic scale development is.
Maximising opportunities for new and improved active and sustainable travel is a key requirement of many site allocation policies. This will include consideration of relevant strategic proposals in the Chelmsford LCWIP, Essex LCWIP, and any adjoining council LCWIPs at site masterplanning/planning application stage – no further change considered necessary.
The Policy wording and reasoned justification set out clearly how walkable neighbourhood principles should be considered – no further change considered necessary.

<u>Strategic Policy S9 – Infrastructure Requirements</u>

Consultation point	**Total number of responses**
Strategic Policy S9 – Infrastructure Requirements	38

Summary of Representations – main issues and requested changes:

General

- Supports requirement for new development to be supported by infrastructure improvements which align with ECC Developers' Guide to Infrastructure Contributions (Essex County Council PS25-213)
- Support the policy and that development must be supported by the provision of infrastructure, services and facilities that are "identified as necessary to serve its needs (Wates Developments and Hammonds Estates LLP PS25-321)
- Supports this overarching policy which ensures the delivery of all necessary supporting infrastructure (Croudace Homes PSQ25-6045)
- Supports 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 (Anglian Water Services Ltd PSQ25-6397)
- Support this policy and satisfied that wastewater treatment capacity and local water environment will be protected by the plan policies (Environment Agency PSQ25-6267)
- Support for plan policies which seek to promote, active and sustainable travel and specifically the promotion of Chart (National Highways PSQ25-6446)
- Allocations close to/adjacent to our network may need to consider noise/air quality issues. Noise barriers or bunds are not allowed on the highway network. Consider suitable noise mitigation solutions during the early stages of design to achieve better outcomes. Recommend a specific policy which identifies how air quality and noise impacts would be monitored and managed and what interventions may be required (National Highways PSQ25-6446)
- As this policy is read in conjunction with Strategic Policy S10, re-instate the wording related to ensuring that the cumulative impact of planning policy, standards and infrastructure requirements do not render development in the Local Plan unviable/undeliverable (Dominus Chelmsford Limited PSQ25-6205)

Transport and Highways

- The infrastructure requirements are evidenced and provide an appropriate basis for determining the likely infrastructure improvements to the local and strategic road network (Wates Developments and Hammonds Estates LLP PS25-322)
- Support para 6.91 requiring more detailed analysis of traffic impacts and mitigation options testing as part of future planning applications (Wates Developments and Hammonds Estates LLP PS25-322)
- Overall, support the plan proposals. Request that the additional Park and Ride site for West Chelmsford is located outside the Green Belt (Writtle Parish Council PSQ25-455)
- Support expressed for the policy. It is important that infrastructure items listed are deliverable and viable (Tritton Farming Partnership LLP PSQ25-5681, PSQ25-5693)
- The latest highway modelling report shows that SGS16a and b have a direct impact on the capacity of A12 Junctions 18 and 19. The developers of these

sites will be required to identify and deliver the necessary junction capacity improvements alongside provision of sustainable and active mode infrastructure and services (Essex County Council PS25-208)

- The need for appropriate public transport should be taken into consideration and new road crossings installed at an early stage of the development (Chelmsford Garden Community Council PSQ25-4951)
- Recognise the considerable projects which support active travel in Chelmsford (Transport for London PSQ25-5922)
- Para 6.90 - amend third sentence to clarify that sustainable travel is encouraged from both garden communities (Essex County Council PS25-207)
- Para 6.98 – delete reference to the Army and Navy Sustainable Transport Package approval to avoid confusion with the three applications approvals (Essex County Council PS25-209)
- Para 6.99 – amend to reflect the latest position including the approval of the Army and Navy junction and expansion to Sandon and Chelmer Valley Park and Ride planning applications by ECC (Essex County Council PS25-210)
- Para 6.100 - amend the Route Based Strategy reference so that the strategies for Mid Essex are the focus and that their latest position is clear (Essex County Council PS25-211)
- Although well developed, the National Highways A12 Junction 19 Chelmsford to J25 Marks Farm improvement scheme is not guaranteed to be delivered due to the uncertain political environment. Therefore, a Local Plan traffic modelling scenario was required where the scheme is either delayed or doesn't go ahead at all. The Local Plan traffic modelling has identified a number of locations on the Strategic Road Network which would come under pressure from increased traffic flows. Namely Junctions 17,18 and 19 on the A12. National Highways previously recommended these locations need a more detailed assessment to understand the scale and nature of the impacts, ideally using a micro simulation model and if necessary suitable mitigation measures found to manage the impact on the junctions and the A12. Third party microsimulation modelling work commenced in 2024 in consultation with National Highways, Essex Highways and CCC. National Highways agreed the base model including methodology and baseline data inputs and have since received the future scenario model (including traffic associated with the Chelmsford Local Plan). We are optimistic that a lot of the issues raised will be resolved before the Examination and would like to continue working closely with CCC with the aim of resolving these issues. As part of this work, we will work to develop a greater understanding of the impact of the proposed development upon the A12 and the required mitigation which should go into the IDP (National Highways PSQ25-6446)
- The allocations in the Local Plan will increase the number of residents in proximity of the Strategic Road Network (SRN), in particular site 16a. It is likely that these locations will be impacted by noise pollution from the SRN and raise the potential for exceedances of air quality standards for which extraordinary measures in the form of permeant speed restriction may need to be considered. This could help with flow and may be required as this section of the A12 reaches capacity (National Highways PSQ25-6446)
- Several polices in the proposed Local Plan set out requirements for developments to reduce the impact on or improve local air quality that does not directly relate to the Strategic Road Network and what mitigation may be

required. National Highways will continue to work proactively with CCC on these matters but would recommend a specific policy which identifies how air quality and noise impacts would be monitored and managed and what interventions may be required (National Highways PSQ25-6446)

- Welcome consideration of a dedicated lorry parking facility ideally close to the strategic road network, or alternatively, a policy requiring adequate lorry parking and lay over facilities at proposed employment sites and roadside service facilities (a study is attached to the representation) (National Highways PSQ25-6446)
- Due to the critical nature of the proposed future infrastructure schemes, engagement with Essex Police is strongly advocated to ensure crime has been designed out and impacts upon emergency services minimised (Essex Police PSQ25-2662)
- Para 6.96 refers to Department for Transport/Major Road Network funding combined with potential developer contributions which is assumed will be through planning obligations. Need to ensure sufficient and timely development relating to Sections 1 and 2 of the CNEB. It is understood that without a complete CNEB, delivery of existing allocations (including Chelmsford Garden Community) could result in the A131 being over capacity (Tritton Farming Partnership LLP PSQ25-5681 and PSQ25-5693)
- Changes to the strategic road network should consider potential impacts on the wider network including London's eastern corridor. To avoid reliance on A12 access into London, Growth Area 3 could explicitly refer to strategic connections to wider employment opportunities for Chelmsford's workforce who work in London. Expanded highways should provide improved infrastructure for sustainable modes such as bus lanes (Transport for London PSQ25-5922)
- Explore further growth options in North Chelmsford to help deliver the CNEB including land around Chatham Green and Great Leighs (Tritton Farming Partnership LLP PSQ25-5681)
- There should be no further development within this parish until the CNEB has been completed or the impact on the existing road system will be overwhelming (Chelmsford Garden Community Council PSQ25-4951)
- Concerned about impacts on the road infrastructure around Maldon and Heybridge as reported in the IIA. Whilst there are no decisions on growth options in our emerging Local Plan, some scenarios include the potential for growth in larger villages like Heybridge (Maldon District Council PSQ25-4938)
- Identify further expansion of Chelmsford Garden Community now or for beyond the current plan period to provide additional funding towards the full CNEB, (Hallam Land Management PSQ25-6383)
- Suggests a wording change to the tenth bullet in relation to capacity improvement on the A132 corridor (Vistry Group PSQ25-6378).

Flood Risk Management

- Support the provision of a new lock and weir gates at Chelmer Waterside (Chelmsford Rivers and Canal Link group PS25-278) which will assist with flood risk and open up the rivers for increased recreational use (Essex Waterways Ltd PSQ25-5208)

- Consider surface water drainage needs early in the design process to ensure the most appropriate solution is found (National Highways PSQ25-6446)
- Do not support a new lock and weir gates at Chelmer Waterside which will impact the viability and deliverability of the Meadows allocation (Dominus Chelmsford Limited PSQ25-6205)
- The policy and IDP is being compromised by not reviewing Green Belt. Development near Writtle could reduce the risk of flooding by providing natural flood management interventions to slow the flow of the River Wid upstream of the City Centre (Vistry Group PS25-298).

Community Facilities

- Support the provision of serviced moorings along the River Chelmer which will enable recreational vessels to visit the City Centre and residents to enjoy the waterways (Essex Waterways Ltd PSQ25-5208)
- Support policy which refers to sport, leisure and recreational facilities. This supports the strategic priorities and is consistent with national policy (Sport England PS25-82)
- Supports the delivery of essential healthcare infrastructure in line with housing growth. Health infrastructure should be at the forefront of priorities for infrastructure delivery. Health providers should have flexibility in determining the most appropriate means of meeting healthcare needs from new development. The NHS and its partners will need to work with CCC in forming appropriate mitigation measures (NHS Property Services Ltd PSQ25-5597, PSQ25-5594)
- Sporting and recreational provision should be made in new developments in accordance with local needs (Chelmsford Garden Community Council PSQ25-4951)
- Bullet one should include a reference to SEND provision in line with ECC's Developers' Guide to Infrastructure Contributions (Essex County Council PS25-205)
- Para 6.79 – Add references to the Fire & Rescue Service and Essex Police for consistency (Essex County Fire and Rescue Service PSQ25-6101, Essex Police PSQ25-6126)
- Allotment deficits exist in north and east Chelmsford and at South Woodham Ferrers. Sites need a range of services/facilities including secure site fencing, good accessibility, wide enough access roads, car parking, raised beds, toilets and secure site hut (Princes Road Allotment Association PS25-47)
- Local schools are oversubscribed and there is inadequate health provision. Adequate services should be provided at an early opportunity in future developments (Chelmsford Garden Community Council PSQ25-4951)
- Challenges the requirement for developers to provide the land and pay the full cost of construction of education infrastructure (Vistry Group PSQ25-6378)
- Concern that there will not be a new doctor's surgery, medical centre or hospital despite all the schools, nurseries, housing and business parks to be built.

Green Infrastructure and Natural Environment

- Supports policy which includes multi-functional green infrastructure. This supports the strategic priorities and is consistent with national policy (Sport England PS25-82)
- Para 6.84 – Welcomes the possible need for additional recreational mitigation measures to address 'alone' impacts of new development. Suggests the policy text is amended to reference other measures outlined in any future iterations of the RAMS (Natural England PSQ25-6243).

Utilities

- Amend policy to refer to gigabit speed broadband (Essex County Council PS25-205)
- Currently there are no known new infrastructure interactions within the area (National Grid Electricity Transmission PSQ25-6238).

CCC Response
Minor modifications will be proposed to policy to reference SEND provision and gigabit speed broadband.
Minor modification will be proposed to para 6.79 to include references to sewers, fire & rescue, police and ambulance services and National Highways, the Environment Agency, utility companies, Essex Police, Essex County Fire & Rescue Service, the East of England Ambulance service NHS Trust and Sport England.
Minor modifications will be proposed to paras 6.90, 6.98, 6.99 and 6.100 to update the plan with the latest position and for clarity and consistency.
Reference to the cumulative impact of planning policy, standards and infrastructure requirements is in reasoned justification of Policy S10.
The reasoned justification to Site Policy 16a refers to Beaulieu Park Rail Station. The plan should be read as a whole, so it is not necessary to repeat it here.
The reasoned justification refers to new development creating demand for measures to encourage sustainable travel choices.
The Council's Infrastructure Delivery Plan (IDP) sits alongside the Local Plan. This assesses the status of infrastructure across Chelmsford and identifies what new infrastructure investment is required to support the Local Plan growth, when it is needed, and funding sources.
Development growth in the Green Belt has been discounted as there is sufficient and suitable land available outside the Green Belt to meet the development needs in a sustainable way. A Green Belt Review is not required.
The reasoned justification of S10 covers the need to ensure that the cumulative impact of planning policy, standards and infrastructure requirements do not render most sites and development identified in the Local Plan unviable and therefore undeliverable.
The Council commissioned Essex Highways to review and consider the key issues raised in the highway and transportation responses received to the consultation. This is given in Appendix 2 and includes a review of representations received from Walshingham Planning on behalf of Little Baddow, Sandon, Boreham & Danbury Parish Councils, National Highways, Vistry Group and Maldon District Council.

Essex Highways response has been used by CCC to understand and respond to matters of concern raised in this You Said We Did report and to inform any proposed modifications to the Pre-Submission Local Plan.
Continued work with National Highways has resulted in a statement of common ground with National Highways and Essex County Council (SOCG033 refers) with all parties agreeing that the Local Plan modelling to date indicates that the development in the Local Plan would have minimal impact upon the A12 and Junctions 17,18 and 19. Further modelling assessments with regards to these junctions are not required for the purposes of the Local Plan, and no modifications are required to be proposed to the Plan. With proportionate and reasonable mitigation strategies in place to support the Local Plan growth, development will ensure that severe impacts on the strategic highway network are avoided.
The Council has co-operated with other bodies on strategic planning matters on an on-going basis as evidenced in the Duty to Co-operate Position Statements (evidence base documents DTC001, DTC002 and DTC005), and Statements of Common Ground including those with adjoining authorities.
It is not considered necessary to amend the bullet point about RAMS as it only addresses recreational impacts, Policy S4 refers to future iterations.
A specific policy identifying how air quality and noise impacts would be monitored and managed and what interventions may be required is not necessary as this is already covered by other policies in the plan.
Paragraph 7.390 of the Pre-Submission Local Plan includes reference to other complementary uses, including roadside facilities, may be appropriate on Strategic Growth Site 16b. The request for a specific allocation for lorry parking at this stage of the Local Plan is not feasible but CCC will continue to work closely with National Highways on this matter to assist them in their need to provide such facilities.
The Local Plan transport modelling includes wider background growth along the A12 corridor. Minor modifications will be proposed to the plan to cover the fact that Growth Area 3 represents opportunities to help deliver employment opportunities both within the Chelmsford area and the wider area, including London.

Strategic Policy S10 – Securing Infrastructure and Impact Mitigation

Consultation point	**Total number of responses**
Strategic Policy S10 – Securing Infrastructure and Impact Mitigation	17

Summary of Representations – main issues and requested changes:

- Support expressed for policy (Essex County Council PS25-213, NHS Property Services Ltd PSQ25-5600)
- 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 (Anglian Water Services Ltd PSQ25-6398)

- Pleased with policy wording on water quality and satisfied that wastewater treatment capacity and local water environment will be protected (Environment Agency PSQ25-6268)
- Support policy but include a specific reference to the Chelmsford Flood Resilience Partnership Project (CFRPP) as the Strategic Flood Risk Assessment (SFRA) makes clear that financial contributions will be expected for this scheme from relevant strategic sites (Environment Agency PSQ25-6268)
- Acknowledges that new development will increase demands on physical and social infrastructure and advises contact is made with the Essex Police to minimise impact upon policing (Essex Police PSQ25-2663)
- Cross reference to Strategic Policy S9 and clarify what developers are expected to contribute towards, and the amounts required and/or the means of calculating them including which sites are expected to deliver which infrastructure and how contributions across all allocations/developments will be proportioned (Croudace Homes PSQ25-6046)
- Re-instate wording around ensuring that the cumulative impact of planning policy, standards and infrastructure requirements do not render the sites and development identified in the Local Plan unviable and therefore undeliverable (Dominus Chelmsford Limited PSQ25-6205)
- Regards infrastructure planning obligations, consider how much growth is directed to locations that relate to such infrastructure, and whether growth is sufficient to fund it (Triton Farming Partnership LLP PSQ25-5683)
- Amend second para to remove the requirement for future infrastructure to be provided solely from proposed development. This is unreasonable as infrastructure planned by a 3rd party could mitigate the development and Grampian conditions could prevent the development occurring until the 3rd party infrastructure was in place (Vistry Strategic Land PS25-136)
- Review the final para to ensure that the Local Plan viability assessment is not inadvertently used to fetter application stage assessment as there will always be site-specific instances where a whole plan viability exercise is not representative of true site costs. Concerns also raised to the Local Plan viability evidence base (Vistry Strategic Land PS25-136)
- ECC has assisted with the preparation of the plan evidence base which covers all main subject areas and seeks to align with the NPPF. Wish to agree the updated IDP prior to submission (Essex County Council PS25-213)
- Broadly support policy. Suggest additional wording to para 6.107 to state that the Council will have regard to the inherent scale and complexity and infrastructure needs of the Garden Communities when assessing the requirements for planning obligations and CIL and that consideration will be given to ringfencing CIL or the use of other bespoke infrastructure mechanisms to help fund infrastructure required to support their delivery. This will align with the draft Planning Obligations SPD, the Community Infrastructure Levy Governance Allocating and Spending CIL (March 2024) and PPG (Wates Developments and Hammonds Estates LLP S25-324)
- Amend para 6.104 to include fire and rescue facilities (East of England Ambulance Service NHS Trust PSQ25-5239) and to ‘Essex Police, Essex County Fire & Rescue Service and the East of England Ambulance service

NHS Trust' instead of 'emergency services' (Essex County Fire and Rescue Service PSQ25-6103, Essex Police PSQ25-6127)

- Amend para 6.105 to include 'fire and rescue, police and ambulance services' instead of 'emergency services' (Essex Police PSQ25-6128, Essex County Fire and Rescue Service PSQ25-6104)
- Notes that the IIA refers to the need to upgrade the Water Treatment Works at SWF and that a large Call for Site nearby could form part of Maldon's strategic site allocations, subject to further assessment work (Maldon District Council PSQ25-4937)
- Overall agree with the plan but seek assurance that the 25% CIL funding to the Parish Council will remain a commitment (Writtle Parish Council PSQ25-462)
- Identify the further expansion of Chelmsford Garden Community (SGS6) now or for growth beyond the current plan period to provide additional developer funding to help deliver the full CNEB (Hallam Land Management PSQ25-6384)
- Alternative strategies and new/expanded site allocations promoted by landowners/developers.

CCC response to the comments made
The reasoned justification covers the need to ensure that the cumulative impact of planning policy, standards and infrastructure requirements do not render most sites and development identified in the Local Plan unviable and therefore undeliverable.
Not considered necessary to refer to the Chelmsford Flood Resilience Partnership Project (CFRPP) in addition to S9. S10 is concerned with how payments will be made.
Minor modifications will be proposed to para 6.104 to include fire and rescue facilities and National Highways, Essex Police, Essex County Fire & Rescue Service and the East of England Ambulance service NHS Trust.
Minor modifications will be proposed to para 6.105 to include police facilities/services.
Information on site specific infrastructure requirements and the means through which they will be secured is set out in the IDP and will be updated annually. This includes administrative wide infrastructure items that are apportioned on a per unit basis across all allocated sites.
The infrastructure required by a development or its contribution towards the infrastructure required to mitigate the impact of a development will be set out in the IDP and updated annually. The IDP includes delivery mechanisms which extend beyond the developer where relevant.
Reference is made to the Local Plan Viability assessment as supported by NPPF and National Planning Practice Guidance.
Inclusion of additional information contained within other documents is not necessary to include in the reasoned justification as it would be unnecessary duplication
The plan is supported by an updated IDP which demonstrates that the plan is viable and deliverable. This is a 'living' document that will be reviewed to ensure the most up-to-date information is used to inform the planning application process.

Reference to the cumulative impact of planning policy, standards and infrastructure requirements can be found in the reasoned justification of this policy.
Engagement is carried out with Police on Local Plan development, and through consultation on planning applications.
A range of alternative development sites have been considered and rejected when developing the Spatial Strategy. More information is set out in the Pre-Submission Spatial Strategy and Strategic Sites Topic Paper and Preferred Options Local Plan.

Strategic Policy S11 – The Role of the Countryside

Consultation point	**Total number of responses**
Strategic Policy S11 – The Role of the Countryside	19

Summary of Representations – main issues and requested changes:

- Support policy (Writtle Parish Council PSQ25-452)
- Support the policy's strategic aims (Elteam PSQ25-5457)
- Broadly supports Part B, but expand the wording to acknowledge that development will be supported where land or buildings do not perform strongly against the Green Wedge, and comply with other relevant plan policies (Cliffords Group Ltd PSQ25-3010)
- Part A needs modifying to reflect the new NPPF (J & T Wardrop and the Wardrop Trust PS25-111)
- Concerns about effectiveness of Part A considering the 2024 NPPF. The plan should be positive on Green Belt development and set out criteria as to how residential development in sustainable locations can come forward to maintain the vitality and viability Chelmsford's communities (Higgins PSQ25-5626)
- Questions the need for a specific Green Wedge policy as less restrictive planning policies can protect the open countryside. Undertake a Green Wedge Review to allow growth in sustainable locations which protect Green Wedge purposes including in Broomfield (Obsidian Strategic Asset Management Ltd PSQ25-5711)
- Unclear if developments within the Green Wedge (Part B) are also assessed against the Rural Area (Part C) (Mr D Bibby and Family and Colleagues PSQ25-6359)
- Requirements for developments to have no adverse impact is too restrictive as Traveller and Travelling Showpeople developments are likely to have an adverse impact on the rural area but can be permitted under Policy DM3. Insert "unacceptable" before "adverse impact" (Mr D Bibby and Family and Colleagues PSQ25-6359)
- Policy should be more flexible and permissive to allow sustainable development to come forward outside of defined built-up areas to address housing land supply shortfalls. See example in Ashford Local Plan 2030 (Gladman Developments Ltd PSQ25-6315)
- There appear no proposals to revise the 'Green Wedges and Green Corridors: Defining Chelmsford's River Valleys 2017' study. Service

Settlements must be provided with housing provision to meet village needs (Mr Paul Hopkins PSQ25-6390)

- Amend the Green Wedge/Belt to extend Robjohns Employment Area. This site has limited value in the openness of the Green Belt, is inconsistent with the Green Wedge criteria and conflicts with Policy DM4 (Saxtons 4x4 PSQ25-6106)
- Exceptional circumstances exist to undertake a Green Belt review and to allocate sites in sustainable locations which comply with the overall Growth Strategy. Development in the Green Belt should be tested via public consultation and the IIA (Martin Grant Homes PS25-149)
- Amend the policy to align with the latest Green/Grey Belt national planning policy and guidance. This will avoid confusion for decision makers and help to meet Government ambitions to increase housing delivery. There may be Grey Belt sites including land in Galleywood (BDW Eastern Counties PSQ25-6030)
- Council should undertake a Green Belt review to help identify further for housing to help housing affordability, increase flexibility in housing supply and support rural sustainability (M Scott Properties Ltd PSQ25-6024)
- Undertake a full Green Belt review and identify development in the Green Belt to provide a more even distribution of growth and maintain the vitality of Green Belt settlements. Release Grey Belt land at Battlesbridge (W. D. Smith & Son PSQ25-6019
- It is inevitable that housing land supply will need to be increased. Amend the Great Baddow Green Belt/settlement boundary to allocate Grey Belt development opportunities (Newell Properties Development Ltd PSQ25-5049)
- Para 6.121 – for clarity and to strengthen the plan, add a new second sentence to read: 'New development will be required to have regard to the Essex Green Infrastructure Strategy (2020) and the Essex Green Infrastructure Standards' (Essex County Council PS25-214)
- Future development should consider and protect rural landscapes and character and the impact upon drainage and SuDS (Chelmsford Garden Community Council PSQ25-4960)
- The current approach to the DSB is overly reliant on arbitrary boundaries which does not feature in the NPPF. Rather than stifling growth in a Key Service Settlement, a flexible, sustainable outlook could be adopted. This would enable contribution on merit for deliverable well connected sustainable sites including in Great Leighs (Mrs Helen Sadler PS25-49, PS25-50, PS25-51)
- Alternative strategies and new/expanded site allocations promoted by landowners/developers.

CCC response to the comments made
Plan seeks to prevent the encroachment of growth into undeveloped areas and the coalescence of existing built-up areas – no further changes needed.
Development growth in the Green Belt has been discounted as there is sufficient and suitable land available outside the Green Belt to meet the development needs in a sustainable way. A Green Belt Review is not required. The Pre-Submission Local Plan will be examined under the 2023 NPPF which does not refer to Grey Belt.

The Green Wedge is a locally important designation. Changes to the Green Wedge boundaries to allow development growth has been discounted as there is sufficient and suitable land elsewhere to meet development needs in a sustainable way. No Green Wedge Review is required, and the deletion of Green Wedge policies would be inappropriate.
Other policies in the plan deal with Green Wedge and Rural Area development including DM8. The plan should be read as a whole, so further provision in S11 would be duplication.
Minor modification will be proposed to para 6.121 CCC to refer to ECC's Green Infrastructure Strategy and Standards.
At the time the Pre-Submission Consultation was carried out (using the Council's Five-Year Housing Land Supply Methodology - April 2024) the Council could demonstrate a Five-Year Housing Land Supply at the point of submission of the Plan. Following the Pre-Submission Consultation the Council's Five-Year Housing Land Supply (based on the August 2025 Housing Site Schedule) showed that at the point of submission (Years 2 – 6) it was estimated to be 8,010 dwellings. Using the August 2025 Housing Site Schedule, it was estimated that the housing requirement figure for the Five-Year Housing Land Supply calculation would be 1,622 dwellings per annum on submission. This was based on the proposed Housing Requirement figure of 1,210 dwellings per annum, the estimated shortfall in housing completions from the new base period of the emerging Local Plan (1,672 dwellings) and the required 5% buffer to ensure choice and competition in the market for land. Based on these figures this would only be 4.93 years of housing land supply (8,010/1,622) on submission. As a result of this the Council undertook an Additional Site Consultation which seeks to rectify this situation and demonstrate that the Local Plan will meet its Five-Year Housing Land Supply at the point of submission. Using the latest housing supply figure in the April 2026 Housing Site Schedule (8,962), and the updated housing requirement figure (including the actual shortfall of 1,783 dwellings that reflects 407 net new completions in 2025/26), the revised Five-Year Housing Land Supply Calculation including a 5% buffer is 5.45 years (8,962/1,645). The housing requirement in the plan meets at least 80% of the revised standard method housing need in line with the Government's latest plan-making transitional arrangements. This is consistent with the NPPF's objective of preparing and maintaining up to-date plans in order to make consistent provision for housing and other needs.
A range of development quantums, broad distributions of development and site options available within the district have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy and Strategic Sites Pre-Submission Topic Paper, Preferred Options Local Plan and the IIA. Responses to the IIA Regulation 19 representations are given in the Pre-Submission IIA Feedback Report.
The Settlement Hierarchy is just one of several considerations for the Spatial Strategy, along with the Vision and Spatial Principles, and is considered to be a robust approach.

Strategic Policy S12 – Role of City, Town and Neighbourhood Centres

Consultation point	Total number of responses
Strategic Policy S12 – Role of City, Town and Neighbourhood Centres	0

No main issues

Strategic Policy S17 – Future of Chelmsford City Centre

Consultation point	Total number of responses
Strategic Policy S17 – Future of Chelmsford City Centre	5

Summary of Representations – main issues and requested changes:

- Strong support for Section E Waterways (Chelmsford Rivers and Canal Link group PS25-279)
- Support the proposals to provide significant improvements to the environmental quality, attractiveness and recreational potential of the waterways and their associated spaces. The Meadows re-development must capitalise on the waterside location to support the Council's policies for the waterways in the City (Essex Waterways Ltd PSQ25-5209)
- It is imperative that crime has been considered a material consideration throughout the design process for town centre regeneration schemes, including the potential impact on operational policing of the night-time economy, ASB opportunities, and minimise the chances for crime and the fear of crime to occur, along with the draft Terrorism (Protection of Premises) Bill (Essex Police PSQ25-2664)
- Support the policy and the approach to use development proposals to support a sustainable and vibrant City Centre, but the effectiveness of this Policy is being compromised by the Council decision not to review its Green Belt boundaries when preparing the Local Plan Review (Vistry Group PS25-300)
- Text relating to small scale reconfiguration of units at The Meadows should be removed (Dominus Chelmsford Limited PSQ25-6486).

CCC Response
Engagement is carried out with Police on Local Plan development, and through consultation on planning applications.
Strategic Growth Site Policy 1w contains detailed guidance to capitalise on the waterside location including layout, water activity, wildlife, active travel and new bridges.
The Council can meet its development requirements without needing to undertake a Green Belt review. This approach accords with National Planning Guidance.

Options for development at The Meadows provide a broad description of potential development approaches which is considered appropriate for this Policy, with the site detail included within Strategic Site Policy 1w.

Strategic Policy S13 – Monitoring and Review

Consultation point	Total number of responses
Strategic Policy S13 – Monitoring and Review	17

- Policy should commit to submit the new plan within two years of adoption and have clear mechanisms to ensure the review will lead to meaningful policy changes (Miscoe Enterprises Ltd PSQ25-2991, Cliffords Group Ltd PSQ25-3016, Cliffords Group Ltd and Mr Mark Peters PSQ25-6503, A.G. & P.W.H. Speakman PSQ25-3043, Daniel James Developments PSQ25-5162, The Bucknell Family PS25-291)
- The submitted plan will conflict with para 231 of the 2024 NPPF for decision-making, so the review process should commence once the current plan is submitted for examination (Rosehart Properties Ltd and Bressole Ltd PSQ25-3193)
- The policy should commit the Council to an immediate update of the plan (Higgins Group PSQ25-5627, Vistry Group PS25-299) and to submit for examination within two years of this plan being adopted (Barratt David Wilson – Eastern Counties (BDW) PSQ25-6029). Policy should commit to the next plan meeting housing needs in full – see policy in the Bedford Local Plan 2030 as an example (Home Builders Federation PSQ25-5474)
- Amend policy to state that if a new plan fails to materialise in two years, that the policies relating to housing supply will be considered out of date (Miscoe Enterprises Ltd PSQ25-2991, Cliffords Group Ltd PSQ25-3016, A.G. & P.W.H. Speakman PSQ25-3043, Daniel James Developments PSQ25-516, Home Builders Federation PSQ25-5474, Barratt David Wilson – Eastern Counties (BDW) PSQ25-6029)
- The policy should commit to an immediate review and to meeting identified need in full. The review should be completed within the three years of adoption (Bloor Homes (Eastern) PSQ25-6146) and meet the full standard method need given the shortfall in the transitional Pre-Submission plan (Martin Grant Homes PS25-151)
- Support a review of the Local Plan within two years of adoption although this is at odds with an unjustified housing requirement. Provide greater certainty around timescales for a review like that in the Bedford Plan 2030 (Gladman Developments Ltd PSQ25-6316)
- Alternative strategies and new/expanded site allocations promoted by landowners/developers.

CCC Response
No changes have been made as the policy meets the necessary requirements and sets an appropriate date for a future review. There is no reason for CCC to commit to an earlier review. The Local Plan is a transitional plan being examined under the

December 2023 NPPF and is not subject to similar significant strategic infrastructure proposals to Bedford.
Other proposed development sites are dealt with in the consideration of Strategic Policy S7 and addressed by the Pre-Submission Integrated Impact Assessment.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.
The Council has co-operated with other bodies on strategic planning matters on an on-going basis as evidenced in the Duty to Co-operate Position Statements (evidence base documents DTC001, DTC002 and DTC005), and Statements of Common Ground.
There is no reason for CCC to commit to an update of the Local Plan earlier than the timeframe set out in Policy S13, which is also set out in Para 34 of the NPPF (2024). CCC Local Plan is being examined against the 2023 version of the NPPF, to meet the transitional arrangements set out in Annex 1 of the 2024 NPPF, specifically Para 234 a - and CCC is not subject to similar significant strategic infrastructure proposals to Bedford.

Where Will Development Growth be Focused?

This section of the consultation document provides the site policies for delivering the Spatial Strategy.

Section 7 – Where Will Development Growth be Focused? and Growth Area 1 – Central and Urban Chelmsford (Paragraphs 7.1 to 7.12 and Figure 16)

Consultation point	Total number of responses
Section 7 - Where Will Development Growth be Focused? and Growth Area 1 – Central and Urban Chelmsford (Paragraphs 7.1 to 7.11 and Figure 16)	9

Summary of Representations – main issues and requested changes:

- Support for Growth Area 1, and the protection of existing Anglian Water assets on relevant sites (Anglian Water Services Ltd PSQ25-6399)
- Support the significant role that central and urban Chelmsford take in the overall development strategy (Gladman Developments Ltd PS25-150)
- Suggest adding reference to fire and rescue to the list of infrastructure in para 7.1 (Essex County Fire and Rescue Service PSQ25-6107)
- This refers to unlocking access to Sandford Mill Special Policy Area, but this appears to have been omitted from Site Policy 3a (Essex Waterways Ltd PSQ25-5210)
- The current approach to defining sustainable locations for development based on settlement boundaries is overly reliant on arbitrary boundaries and a

flexible greener outlook could be adopted i.e. walking distance to key services (Mrs Helen Sadler PS25-52)

- Further sites should be allocated to meet the needs of the district, identified through a Green Belt review – including a promoted site at Galleywood Road, Great Baddow (Taylor Wimpey Strategic Land PSQ25-5448), a promoted site at Smithers Drive, Great Baddow (Martin Grant Homes PS25-150)
- Sustainable sites within the Green Belt should be safeguarded to meet future development needs, through a Green Belt review (Croudace Homes PSQ25-6048)
- Amend site infrastructure requirements related to education for all Strategic and Growth Site Policies (excluding SGS 6, 10 and 16a) to: 'Financial contributions to primary, secondary, early years education and childcare as required by the Local Education Authority.' (Essex County Council PS25-184).

CCC Response
Minor modification will be proposed to refer to fire and rescue facilities.
The intention is for most visitors to Sandford Mill to park in the country park car park south of the Navigation and access the site via a foot/cycle bridge. Details of access for commercial vehicles is part of further discussion relating to a current planning application for Site 3a.
The Council can meet its development requirements without needing to undertake a Green Belt review. This approach accords with National Planning Guidance.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process.
The site allocation policies refer to site specific education requirements as supported by the plan evidence base, rather than a generic requirement.

Strategic Growth Site Policy 1a - Chelmer Waterside

Key statistics:

Consultation point	**Total number of responses**
Strategic Growth Site Policy 1a - Chelmer Waterside	4

Summary of Representations – main issues and requested changes:

- Support the policy which will assist in realising the fuller amenity and recreational potential of the waterway, flood prevention, and habitats (Essex Waterways Ltd PSQ25-5211)
- Residential travel plans could also reference connectivity to London via rail (Transport for London PSQ25-5915)
- New residential development will need to rely on existing public open space, but some assessment should made to ensure these can meet the GI Standards, as well as information leaflets for new residents (Natural England PSQ25-6245)
- Land remediation should be a requirement rather than an expectation. The list of infrastructure needs should include specific reference to financial

contributions for flood risk management infrastructure (Environment Agency PSQ25-6277).

CCC Response
It is considered that travel and access to rail services is already covered within the Local Plan, not only for the Great Eastern Mail Line but also for the Crouch Valley Line.
Flood risk is widely covered within strategic and relevant site policies, with specific requirements also specified in the Infrastructure Delivery Plan.
The Plan should be read as a whole. Policy DM30 sets out the Council's requirements before permission can be granted for development on, or near to contaminated land.

Strategic Growth Site Policy 1w – Meadows Shopping Centre and Meadows Surface Car Park

Consultation point	Total number of responses
Strategic Growth Site Policy 1w – Meadows Shopping Centre and Meadows Surface Car Park	9

Summary of Representations – main issues and requested changes:

- The proposed bridges should provide navigational headroom to support navigation on the City's rivers (Essex Waterways Ltd PSQ25-5212, Chelmsford Rivers and Canal Link group PS25-280)
- Welcome the supporting heritage evidence to support this site allocation, and the heritage criteria, within the policy, for the mitigation measures which should be followed to protect and enhance the historic environment (Historic England PSQ25-5802)
- Support from a charity which would like to become involved with providing community and educational opportunities within the new development (Independence Project PSQ25-6035)
- Additional reference should be made to optimising development and raising the allocation figure to better reflect the current planning position (Dominus Chelmsford Limited PSQ25-6198)
- New residential development will need to reply on existing public open space, but some assessment should made to ensure these can meet the GI Standards, as well as information leaflets for new residents (Natural England PSQ25-6246)
- The list of infrastructure needs should include specific reference to financial contributions for flood risk management infrastructure (Environment Agency PSQ25-6286).

CCC Response
Bridge height is included within the reasoned justification at para 7.35.
Flood risk is widely covered within strategic and relevant site policies, with specific requirements also specified in the Infrastructure Delivery Plan.

Strategic Growth Site Policy 1b – Former St Peter's College, Fox Crescent

Consultation point	Total number of responses
Strategic Growth Site Policy 1b – Former St Peter's College, Fox Crescent	2

Summary of Representations – main issues and requested changes:

- The former playing pitches on the site have not been used for 14 years, the open space designation has been removed from the map and the text at para 7.45 should be deleted to reflect this and provide consistency (Essex Housing PSQ25-5548)
- Support the requirement to provide or make financial contributions to new or enhanced sport, leisure and recreation facilities and a commuted sum in lieu of the loss of the former school playing fields. Should refer to the Council's new Playing Pitch Strategy (2025) which confirms playing pitches should be protected or replaced even if they are disused or poor quality and identifies clear deficiencies which would support upholding the requirements of the policy (Sport England PS25-83).

CCC Response
The Playing Pitch and Outdoor Sport Strategy 2024 (evidence base document BG-003-E) confirms that there are deficiencies in the capacity of existing pitches to meet demand, particularly at peak times, meaning that replacement or local off-site pitch and facilities improvements are required both to offset the loss and provide for increased demand generated by the development. Policies Map is proposed to be amended to reinstate the open space designation as identified in BG-003-E which was incorrectly removed on the Pre-Submission Policies Map.

Strategic Growth Site Policy 1d – Riverside Ice and Leisure Land, Victoria Road

Consultation point	Total number of responses
Strategic Growth Site Policy 1d – Riverside Ice and Leisure Land, Victoria Road	4

Summary of Representations – main issues and requested changes:

- Support for the policy, particularly relating to improvement of Mallard Bridge which has inadequate pedestrian/cycle width and restricted headroom for recreational use, and to provision of new lock and weir gates for flood

protection and navigational benefits (Essex Waterways Ltd PSQ25-5214, Chelmsford Rivers and Canal Link group PS25-285)
- The list of infrastructure needs should include specific reference to financial contributions for flood risk management infrastructure (Environment Agency PSQ25-6283).
- Works to Mallard Bridge need to take consideration of existing river users, and of nearby nesting swans (Chelmsford Canoe Club PS25-250).

CCC Response
Flood risk is widely covered within strategic and relevant site policies, with specific requirements also specified in the Infrastructure Delivery Plan.

Strategic Growth Site Policy 1e – Civic Centre Land, Fairfield Road

Consultation point	**Total number of responses**
Strategic Growth Site Policy 1e – Civic Centre Land, Fairfield Road	5

Summary of Representations – main issues and requested changes:

- Support for references to safe and convenient pedestrian and cycle connections which ECC plans to improve in this area (Essex County Council PS25-216)
- Suggest adding reference to fire and rescue facilities in the list of infrastructure requirements (Essex County Fire and Rescue Service PSQ25-6108, PSQ25-6114); and to ambulance services (Essex Police PSQ25-6129, PSQ25-6130).

CCC Response
Minor modification will be proposed to include reference to fire and rescue facilities, and ambulance services, in the list of infrastructure requirements in policy and at para 7.71

Strategic Growth Site Policy 1f – Eastwood House Car Park, Glebe Road

Key statistics:

Consultation point	**Total number of responses**
Strategic Growth Site Policy 1f – Eastwood House Car Park, Glebe Road	1

Summary of Representations – main issues and requested changes:

- Recommends stronger wording to ensure development is required to deliver a remediation strategy, rather than just expected to (Environment Agency PSQ25-6279).

CCC Response
This requirement is considered to be adequately covered by Policy DM30 A) – Contamination and Pollution.

Strategic Growth Site Policy 1y – Land Between Hoffmanns Way and Brook Street (Marriages Mill)

Consultation point	Total number of responses
Strategic Growth Site Policy 1y – Land Between Hoffmanns Way and Brook Street (Marriages Mill)	3

Summary of Representations – main issues and requested changes:

- Support the inclusion of the heritage criteria (Historic England PSQ25-5805)
- The allocation is supported, but a higher density of housing would be appropriate for this sustainable town centre location, previous work indicates around 250/300 dwellings and commercial uses can be accommodated so the number should be increased (W & H Marriage & Sons Ltd PSQ25-6061)
- Recommends stronger wording to ensure developments are required to deliver a remediation strategy, rather than just expected to Environment Agency PSQ25-6287).

CCC Response
The remediation requirement is considered to be adequately covered by Policy DM30 A) – Contamination and Pollution.
The use of the ‘around’ housing figure would allow for a higher density development to be brought forward where this addresses site constraints and conforms with other policies in the plan as a whole.

Strategic Growth Site Policy 1cc – Andrews Place, Land West of Rainsford Lane

Consultation point	Total number of responses
Strategic Growth Site Policy 1cc – Andrews Place, Land West of Rainsford Lane	3

Summary of Representations – main issues and requested changes:

- There is no justification for excluding market housing, which may impact on the ability to deliver affordable housing on site – alternative wording suggested (CHP PSQ25-2974)
- The list of infrastructure needs should include specific reference to financial contributions for flood risk management infrastructure (Environment Agency PSQ25-6288)
- Do not object to principal of redevelopment – however concerns expressed as a long-standing local resident as follows: by replacing 60 dwellings with 240 properties, mainly as flats, there is the potential to exacerbate the already high levels of crime in this area including drugs and violence; parking provision is considerably less than required impacting on other local roads where there are no parking restrictions in place.

CCC Response
Redevelopment of the site is not considered an over development and will be expected to provide parking in line with Policy DM27.
Flood risk is widely covered within strategic and relevant site policies, with specific requirements also specified in the Infrastructure Delivery Plan.
It is envisaged that the site will provide a significant number of affordable homes to help meet the area's needs for affordable and specialist housing and as a minimum re-provide the current number of affordable housing for rent dwellings on the site. Minor modifications will be proposed to the Policy text to acknowledge the challenge of providing a site for 100% affordable housing but reflecting the expectation that the existing level of affordable housing for rent is re-provided.

Policy GR1 – Growth Sites in Chelmsford City Centre/Urban Area

Key statistics:

Consultation point	**Total number of responses**
Policy GR1 – Growth sites in Chelmsford City Centre/Urban Area	2

Summary of Representations – main issues and requested changes:

- The eastern part of the former Key-Metzeler premises (Brook Street/New Street) should remain as a currently designated Employment Area use but re-designation of the western part of the site in line with its former draft site allocation (previously SGS1x in the Preferred Options Consultation Document, now removed) for residential use would be desirable to enable additional residential growth in a sustainable city centre location (HEVF Self Storage UK Limited PSQ25-6336).

CCC Response
The proposed former Kay Metzeler site allocation was removed from the Pre-Submission Local Plan following a change of circumstances. However, the site is now proposed for inclusion in the Focused Consultation Additional Sites Document to support increased housing requirements.

Growth Site Policy 1g – Chelmsford Social Club, Springfield Road

Key statistics:

Consultation point	Total number of responses
Growth Site Policy 1g – Chelmsford Social Club, Springfield Road	2

Summary of Representations – main issues and requested changes:

- Support for the policy, particularly enhanced route links and the improvement of Mallard Bridge which has inadequate pedestrian/cycle width and restricted headroom for recreational use (Essex Waterways Ltd PSQ25-5215)
- Support for funding for the Mallard Bridge, which should be at navigation height, and replacement lock and weir (Chelmsford Rivers and Canal Link group PS25-284).

CCC Response
No comments

Growth Site Policy 1h – Ashby House Car Parks, New Street

Consultation point	Total number of responses
Growth Site Policy 1h – Ashby House Car Parks, New Street	0

Summary of Representations – main issues and requested changes:

- No main issues

CCC Response
N/A

Growth Site Policy 1i – Rectory Lane Car Park West

Consultation point	Total number of responses
Growth Site Policy 1i – Rectory Lane Car Park West	1

Summary of Representations – main issues and requested changes:

- In reconfiguring the car park, consideration should be given to using existing spaces to accommodate bus laybys to help ease safety issues along Broomfield Road with regards pupils accessing Chelmsford County High School for Girls (Essex County Council PS25-217).

CCC Response
This would reduce the developable area of the site but could be considered at planning application stage.

Growth Site Policy 1z – Granary Car Park, Victoria Road

Consultation point	**Total number of responses**
Growth Site Policy 1z – Granary Car park, Victoria Road	2

Summary of Representations – main issues and requested changes:

- Support the inclusion of the heritage criteria (Historic England PSQ25-5806)
- There is an opportunity for a greater number of homes and a density of 90dph, which should be explicitly supported in the policy, and it is premature to reduce to 50 from 60 in the Preferred Options plan (Sempra Homes PSQ25-3107).

CCC Response
The use of the 'around' housing figure would allow for a higher density development to be brought forward where this addresses site constraints and conforms with other policies in the Plan as a whole.

Growth Site Policy 1k – Former Chelmsford Electrical and Car Wash, Brook Street

Consultation point	**Total number of responses**
Growth Site Policy 1k – Former Chelmsford Electrical and Car Wash, Brook Street	0

Summary of Representations – main issues and requested changes:

- No main issues

CCC Response
N/A

Growth Site Policy 1aa – Coval Lane Car Park

Consultation point	Total number of responses
Growth Site Policy 1aa – Coval Lane Car Park	1

Summary of Representations – main issues and requested changes:

- Support the inclusion of the heritage criteria (Historic England PSQ25-5808).

CCC Response
No comments.

Growth Site Policy 1l – BT Telephone Exchange, Cottage Place

Consultation point	Total number of responses
Growth Site Policy 1l – BT Telephone Exchange, Cottage Place	0

Summary of Representations – main issues and requested changes:

- No main issues

CCC Response
N/A

Growth Site Policy 1m – Rectory Lane Car Park East

Consultation point	Total number of responses
Growth Site Policy 1m – Rectory Lane Car Park East	0

Summary of Representations – main issues and requested changes:

- No main issues

CCC Response
N/A

Growth Site Policy 1n – Waterhouse Lane Depot and Nursery

Consultation point	Total number of responses
Growth Site Policy 1n – Waterhouse Lane Depot and Nursery	0

Summary of Representations – main issues and requested changes:

- No main issues

CCC Response
N/A

Growth Site Policy 1p – British Legion, New London Road

Consultation point	Total number of responses
Growth Site Policy 1p – British Legion, New London Road	0

Summary of Representations – main issues and requested changes:

- No main issues

CCC Response
N/A

Growth Site Policy 1q – Land rear of 17-37 Beach's Drive

Consultation point	Total number of responses
Growth Site Policy 1q – Land rear of 17-37 Beach's Drive	0

Summary of Representations – main issues and requested changes:

- No main issues

CCC Response
N/A

Growth Site Policy 1r – Garage Site, St Nazaire Road

Consultation point	Total number of responses
Growth Site Policy 1r – Garage Site, St Nazaire Road	0

Summary of Representations – main issues and requested changes:

- No main issues

CCC Response
N/A

Growth Site Policy 1bb – Glebe Road Car Park

Consultation point	Total number of responses
Growth Site Policy 1bb – Glebe Road Car Park	2

Summary of Representations – main issues and requested changes:

- Suggest additional detail for clarity relating to materials and screening to secure a well-informed approach to placemaking and the historic environment (Historic England PSQ25-5809)
- Concern at a loss of public parking, particularly overnight parking for nearby residents and visitors, also privacy and noise concerns from new properties overlooking existing gardens on Townfield Street.

CCC Response
A requirement for layout to reinstate a built frontage to Glebe Road will be proposed to be added to the policy. Definition of materials is considered to be too detailed for inclusion in the policy, and inconsistent with other allocation policies in the plan – Policy DM13 C) ii) and DM23 cover building materials and finishes that are appropriate to the local context. Bullet point five in the policy already clearly sets out the requirement for parking, amenity and refuse areas to be screened from the streetscene.
Development proposals would need to comply with Policies DM23 and DM29 relating to design and protecting living environments.

Growth Site Policy 1s – Garage Site and Land, Medway Close

Consultation point	Total number of responses
Growth Site Policy 1s – Garage Site and Land, Medway Close	0

Summary of Representations – main issues and requested changes:

- No main issues

CCC Response
N/A

Growth Site Policy 1t – Car Park r/o Bellamy Court, Broomfield Road

Consultation point	Total number of responses
Growth Site Policy 1t –Car Park r/o Bellamy Court, Broomfield Road	0

Summary of Representations – main issues and requested changes:

- No main issues

CCC Response
N/A

Growth Site Policy 1v – Railway Sidings, Brook Street

Consultation point	Total number of responses
Growth Site Policy 1v – Railway Sidings, Brook Street	0

Summary of Representations – main issues and requested changes:

- No main issues

CCC Response
N/A

Location 2 – West Chelmsford

Strategic Growth Site Policy 2 – West Chelmsford

Consultation point	Total number of responses
Strategic Growth Site Policy 2 – West Chelmsford	6

Summary of Representations – main issues and requested changes:

- Welcome reference to the masterplanning principle to provide or make financial contributions to new or enhanced sport, leisure and recreational facilities as justified by the Council's emerging evidence base, other plan polices and NPPF (Sport England PS25-84)
- Overall agreement with the proposed proposals. Welcome the commitment to CIL funding and to the Writtle Neighbourhood Plan helping to shape the development (Writtle Parish Council PSQ25-457)
- No objection to the policy but expand site allocation to the south and north-east. Question how the SHELAA has informed the selection/rejection of sites, and it needs to reflect available information/evidence and opportunities to mitigate potential constraints identified. The IIA should assess sites in their own right and West Chelmsford as a growth location. Unclear how the proposed additional benefits of the promoted developments have been considered (Taylor Wimpey Strategic Land PS25-318, Crest Nicholson PSQ25-6082)
- Concerns about adverse of the development on Roxwell Parish including no apparent provision to create additional health services and increased traffic and road safety on the A1060. Adjust the plan to provide additional primary healthcare facilities and to extend the 40mph speed limit beyond Boyton Hall to the junction with Vicarage Road (Roxwell Parish Council PSQ25-5824)
- Expand para 7.120 to include the following: 'A safe traffic free environment around school pedestrian entrances must be provided, ensuring access for emergency vehicles only' (Essex County Council PS25-220).

CCC Response
Minor modification will be proposed to para 7.120, to provide a traffic free environment around school pedestrian entrances.
The site policy requires financial contributions to, and/or onsite provision of, other community facilities such as healthcare provision. Further details are set out in planning application 21/01545/OUT which the Council has resolved to grant planning permission, subject to conditions and the completion of a Section 106 agreement. This includes provision of a new healthcare facility.
The site policy requires appropriate improvements to the local and strategic road network as required by the Local Highways and Transportation Authority. Specific improvements will be agreed at planning application stage. Further details are set out in planning application 21/01545/OUT which the Council has resolved to grant planning permission, subject to conditions and the completion of a Section 106 agreement. This includes local highways improvements and sustainable transport measures.
A range of development quantums, broad distributions of development and site options available within the district have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy and Strategic Site Pre-Submission Topic Paper, Preferred Options Local Plan and the IIA. Responses to the IIA Regulation 19 representations are given in the Pre-Submission IIA Feedback Report.

Location 3 – East Chelmsford

Strategic Growth Site Policy 3a – East of Chelmsford, Manor Farm

Consultation point	Total number of responses
Strategic Growth Site Policy 3a – East of Chelmsford, Manor Farm	8

Summary of Representations – main issues and requested changes:

- Welcome the mitigation measures to address cumulative recreational pressure on the SSSIs but impacts on coastal sites will need to be considered. Clarification on the name of SSSIs provided (Natural England PSQ25-6247)
- Welcome the requirement for financial contributions and masterplanning principle for providing new or enhanced sport, leisure, recreation and community uses (Sport England PS25-85)
- Object to the change to this policy which now omits the requirement for a vehicular access to Sandford Mill, only requiring pedestrian/cycle access. New vehicular access from the A414 is essential to provide adequate HGV service access for its proposed use as a Visitor Centre with marina facilities in conjunction with the Chelmer & Blackwater Navigation. The existing northern access is restricted by two II listed Navigation bridges which are unsuitable for HGVs and coaches (Essex Waterways Ltd PSQ25-5217, Chelmsford Rivers and Canal Link group PS25-281)
- The policy should be reviewed to clarify that financial contributions will only be required where it can be demonstrated that they meet the requirements of the CIL Regulations (Hopkins Homes PS25-199)
- The position relating to the need for a Minerals Resource Assessment (MRA) should be reviewed against exemptions in the Minerals Local Plan (MLP) (Appendix 5) which is not addressed (Hopkins Homes PS25-199)
- The decision to include Manor Farm was only possible after part of the farm was removed from Green Wedge status
- Concerns that toxic waste from Baden Powell Close is burning its way towards the river, which regularly floods
- Questions how the Local Plan allocation is consistent with Sandon and Little Baddow Neighbourhood Plans.

CCC Response
The intention is for most visitors to Sandford Mill to park in the country park car park south of the Navigation and access the site via a foot/cycle bridge. Details of access for commercial vehicles is part of further discussion relating to a current planning application.
Ground conditions are considered to be adequately covered by Policy DM30 A) – Contamination and Pollution.
This site allocation is within the Great Baddow Parish, which does not have a made Neighbourhood Plan.

ECC as Minerals and Waste Planning Authority has assessed proposed Local Plan allocation sites through the plan preparation process to identify where a Minerals Resource Assessment (MRA) is required. If a planning application is received for this site an MRA will be required. This requirement was added in 2018 following the Preferred Options consultation for the Adopted Local Plan. In addition, the emerging Replacement Essex Minerals Local Plan clarifies the requirement for planning applications on Local Plan allocation sites to conduct a MRA (subject to the thresholds in the Minerals Local Plan Policy S8).
The site allocation is rolled over from the adopted Local Plan 2020 and following a Green Wedge review.
The Council will use various mechanisms to secure necessary infrastructure, including the Community Infrastructure Levy (CIL), Section 106 legal agreements, Section 278 legal agreements (where relevant) and planning conditions.

Strategic Growth Site Policy 3b – East of Chelmsford, Land North of Maldon Road (Employment)

Consultation point	**Total number of responses**
Strategic Growth Site Policy 3b – East of Chelmsford, Land North of Maldon Road (Employment)	4

Summary of Representations – main issues and requested changes:

- Support for the policy (Barratt Redrow PSQ25-5166)
- Support for additional wording relating to a strategy for responding to National Grid Electricity Transmission plc (NGET) overhead transmission lines (National Grid Electricity Transmission PSQ25-6235)
- Support for the policy, in particular safeguarded bus access which is demonstrated to be feasible (Wates Developments and Hammonds Estates LLP PS25-305)
- Propose that the allocation be increased to approximately 40,000 sqm with associated parking, to provide more flexibility in layout and access to take account of overhead power lines (The Speakman Family PSQ25-6328)

CCC Response
The allocation is sufficiently flexible to allow changes in quantity of floorspace to reflect site constraints.

Strategic Growth Site Policy 3c – East of Chelmsford, Land South of Maldon Road

Consultation point	**Total number of responses**
Strategic Growth Site Policy 3c – East of Chelmsford, Land South of Maldon Road	3

Summary of Representations – main issues and requested changes:

- Support for the policy (Barratt Redrow PSQ25-5167)
- Welcome the mitigation measures to address cumulative recreational pressure on the SSSIs but impacts on coastal sites will need to be considered. Clarification on SSSI names provided (Natural England PSQ25-6248)
- It has become increasingly difficult to address the ever-increasing infrastructure requirements being sought by Essex County Council Highways. It should not then have 'catch all' criteria as well, which could allow them to add further infrastructure. Suggest the first and fourth bullet points under 'Site infrastructure requirements' should be deleted (Barratt Redrow PSQ25-5167)
- Two additional requirements relating to recreational pressure on the SSSIs are unwarranted, given the Country Park at Site 3a and open space already proposed for this site, and should be deleted (Barratt Redrow PSQ25-5167)
- The site can be designed around above ground electricity lines, so the policy should be amended to allow flexibility for not moving these underground (Barratt Redrow PSQ25-5167)
- Other nearby sites (in Mayes Lane) are available and suitable for allocation and would contribute to meeting housing needs (J & T Wardrop and the Wardrop Trust PS25-111).

CCC Response
Requirements for improvements required by the Local Highways and Transportation Authority feed into planning applications and are qualified using 'appropriate' to enable them to relate to individual site circumstances.
Mitigation relating to recreational pressure on the SSSIs are included to meet Natural England's requirements.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process.
Undergrounding of electricity pylons and lines cables is an appropriate requirement given they cross the eastern part of the site.

Strategic Growth Site Policy 3d – East of Chelmsford, North of Maldon Road

Consultation point	**Total number of responses**
Strategic Growth Site Policy 3d – East of Chelmsford, North of Maldon Road	1

Summary of Representations – main issues and requested changes:

- Support for the policy (Barratt Redrow PSQ25-5167)
- Two additional requirements relating to recreational pressure on the SSSIs are unwarranted, given the Country Park at Site 3a and open space already proposed for this site, and should be deleted (Barratt Redrow PSQ25-5167)

- The site can be designed around above ground electricity lines, so the policy should be amended to allow flexibility for not moving these underground (Barratt Redrow PSQ25-5168).

CCC Response
Mitigation relating to recreational pressure on the SSSIs are included to meet Natural England's requirements.
Undergrounding of electricity pylons and lines cables is an appropriate requirement given they cross the eastern part of the site.

Location 4 – Growth Site Policy 4 – Land North of Galleywood Reservoir

Consultation point	Total number of responses
Growth Site Policy 4 – Land North of Galleywood Reservoir	1

Summary of Representations – main issues and requested changes:

- A promoted site in Galleywood should be allocated to help meet specialist residential accommodation needs (J & T Wardrop and the Wardrop Trust PS25-112).

CCC Response
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process.

Location 5 – Growth Site Policy 5 – Land Surrounding Telephone Exchange, Ongar Road, Writtle

Consultation point	Total number of responses
Growth Site Policy 5 – Land Surrounding Telephone Exchange, Ongar Road, Writtle	4

Summary of Representations – main issues and requested changes:

- Overall, the Parish Council agrees with this allocation and welcome the commitment to 25% of CIL being payable to the Parish Council through its made Neighbourhood Plan (Writtle Parish Council PSQ25-458)
- Support the allocation but would prefer the development amount to be expressed as a minimum or to be indicative (Telereal Securitised Property GP Limited PSQ25-4986)
- Any on-site infrastructure provision and/or financial contributions must be 'appropriate and proportionate' to the scale of the development. Insert such wording in each bullet requiring financial contributions. This will also align with

Growth Site policies such as 3a and 3c (Telereal Securitised Property GP Limited PSQ25-4986).

CCC Response
Policy requirements for financial contributions will be appropriate and proportionate' to the scale of the development and the wording is consistent with other site allocation policies.
The use of the 'around' housing figure allows for a lesser or greater amount of development to be brought forward where this addresses site constraints and conforms with other policies in the plan as a whole.

Growth Area 2 – North Chelmsford (paragraphs 7.207-7.212 and Figure 17)

Consultation point	Total number of responses
Growth Area 2 – North Chelmsford (paragraphs 7.207-7.212 and Figure 17)	3

Summary of Representations – main issues and requested changes:

- Welcome the ambition to increase active and public transport, however the language could be firmer. Introduce maximum parking standards in areas close to stations and explicitly reference improved access to London (Transport for London PSQ25-5919)
- Support the Council's recognition of the strategic importance of North East Chelmsford and the Chelmsford
- in accommodating significant levels of growth across the plan period (Daniel James Developments PSQ25-3060, PSQ25-6485)
- The suitability of Boreham for development has been overlooked as a reasonable alternative to Hammonds Farm and it must be noted that the strategic sites included within the adopted plan are yet to deliver (Gladman Developments Ltd PSQ25-6318).

CCC Response
The new 2024 parking standards provides the opportunity for development locations in highly sustainable locations to have a lower level of parking where an assessment can justify it. The Local Plan uses these more recent parking standards so there is no need to refer to reduced parking directly. Additional wording proposed to be added to acknowledge improved access to London.
The plan follows the 2024 Essex Parking Guidance as set out in DM27.
As a stand-alone site, the promoted land at Boreham is too small to be considered as a reasonable alternative to Hammonds Farm.

Location 6 – North East Chelmsford (Chelmsford Garden Community)

Strategic Growth Site Policy 6 – North East Chelmsford (Chelmsford Garden Community)

Key statistics:

Consultation point	Total number of responses
Strategic Growth Site Policy 6 – North East Chelmsford Garden Community	21

Summary of Representations – main issues and requested changes:

- Support policy requirements for pedestrian, cycleway and bridleways; open space, sport, leisure and recreation facilities; community space and a new Country Park (Sport England PS25-86)
- Support opportunities for dual use sports facilities as justified by the Council's new sports evidence base, Government policy and other plan policies (Sport England PS25-86)
- Welcome reference to encouraging healthy and active lifestyles in line with the Active Design guidance in para 7.223 (Sport England PS25-86)
- Note changes to S4, S9 and DM16 which will address the requirement for this development to provide suitable alternative natural greenspace to provide mitigation in part for increased recreational impacts on international coastal designated sites under Essex Coast RAMS (Natural England, PSQ25-6249)
- Support for the site/policy (Daniel James Developments PSQ25-3064, Halley Development PSQ25-5041)
- We are committed to delivering CGC, but concerns are raised in relation to the assumptions in the Regulation 19 Viability Note (Chelmsford Garden Community Consortium PSQ25-6339, PSQ25-6354, Vistry Group PSQ25-6362)
- Revise policy to state the development proposals will be informed rather than accord with the DFD as it is not subject to examination (Halley Development PSQ25-5041, Ptarmigan Chelmsford A Limited PSQ25-5574)
- Amend policy to state a 'minimum' of 681 homes beyond 2024 to ensure consistency with the NPPF (Ptarmigan Chelmsford A Limited PSQ25-5574)
- Expand policy requirement to also provide safe and convenient connections to the Park and Ride to ensure consistency with the NPPF (Ptarmigan Chelmsford A Limited PSQ25-5574)
- Amend policy requirement to provide 'up to' 56,946sqm of dedicated employment land (Chelmsford Garden Community Consortium PSQ25-6339, PSQ25-6354, Vistry Group PSQ25-6362)
- Amend policy requirement and para 7.239 to provide a minimum of 10% BNG per phase with an aspiration of 20% across the site subject to site constraints and 'viability', to ensure accordance with the approved DFD (Chelmsford Garden Community Consortium PSQ25-6339, PSQ25-6354, Vistry Group PSQ25-6362, PSQ25-6363)

- Delete requirement for a Gypsy and Traveller site as this is not properly evidenced and could result in a shortfall is another type of specialist residential accommodation elsewhere (Chelmsford Garden Community Consortium PSQ25-6339, PSQ25-6345, PSQ25-6354, Vistry Group PSQ25-6362, PSQ25-6368)
- Amend policy and para 7.223 to provide 'up to' four new stand-alone early years and childcare nurseries 'within the village centres' (Chelmsford Garden Community Consortium, PSQ25-6339, PSQ25-6346, PSQ25-6354, Vistry Group PSQ25-6362)
- Amend requirement and para 7.229 to enable a 60% modal share 'within the development' (Chelmsford Garden Community Consortium PSQ25-6339, PSQ25-6354, Vistry Group PSQ25-6362)
- Delete requirement for the new all-through school to be on 'suitable' land (Chelmsford Garden Community Consortium PSQ25-6339/6354, Vistry Group PSQ25-6362, PSQ25-6369)
- Amend requirement to state that financial contributions towards delivery of Section 1a of the Chelmsford North East Bypass will be 'in the form of HIF Recovery and Recycling payments subject to viability testing' (Chelmsford Garden Community Consortium PSQ25-6339, PSQ25-6354, Vistry Group PSQ25-6362)
- Amend para 7.221 to provide a Travelling Showpeople site for 10 pitches based on 0.2 hectares per plot with convenient access for heavy goods vehicles. Delete requirement for a 10 pitch Gypsy and Traveller site with delivery through a Registered Housing Provider (Chelmsford Garden Community Consortium PSQ25-6339, PSQ25-6354, Vistry Group PSQ25-6362)
- Add an additional bullet under 'Site infrastructure requirements' in line with the ECC Developers' Guide to read: Financial contributions to primary, secondary, early years and childcare, including SEND education as required by the Local Education Authority (Essex County Council PS25-222)
- Amend para 7.225 to delete the reference to a joint use agreement being 'secured' through the outline planning application or its s106 agreement. Replace instead with wording that alludes to the preparation of a Joint Use Agreement between the City Council and the school provider once appointed (Essex County Council PS25-223)
- Reinstate 13 Travelling Showpeople plots to this site (from the Preferred Option Plan) and delete from SGS16a. The transfer to SGS16a is unjustified and does not distribute needs appropriately across the district. It will also be challenging to accommodate at SGS16a in tandem with the proposed Gypsy and Traveller provision. Chelmsford Garden Community can adequately accommodate the plots as part of the mix of uses on the largest of the Garden Community sites (Wates Developments and Hammonds Estates LLP PS25-306)
- The trajectory for the site is unrealistic and not justified by evidence. Allocate additional housing close to Chelmsford to address a c2,000 shortfall in housing delivery over the plan period (Hill Residential Ltd PSQ25-5195)
- Land south of Pratts Farm Lane within the site is suitable new sports and leisure facilities (Cliffords Group Ltd PSQ25-3031)

- Expand site to incorporate land to the north and south of Peverel's Farm or amend policy to enable sites along Domsey Lane to come forward as stand-alone developments (Daniel James Developments PSQ25-3064)
- Expand site to incorporate land north of Wheelers Hill (or as a potential area for longer term growth beyond the Plan period) to boost housing supply, address affordability issues and unmet needs of neighbouring areas, and help deliver the full Chelmsford North East Bypass (Hallam Land Management PSQ25-6385)
- Expand site to incorporate land north of Cranham Road to boost housing land supply. Remove/reduce the number of dwellings allocated at SGS16a and redistribute the growth to North Chelmsford (Higgins Homes, PS25-365
- Essex Police have engaged with the design teams at the early design stage, for Chelmsford Community Garden (Essex Police PSQ25-2666).

CCC Response
Given the three outline planning applications relating to this site will be accompanied by a Development Framework Document, Infrastructure Delivery Plan and Planning Framework Agreement, any updates or conflict with the area wide Local Plan Viability Update will be addressed in a Statement of Common Ground with the CGC Consortium when the documents/applications are agreed/approved, prior to Examination of the Local Plan.
Minor modifications will be proposed to state a 'minimum' of 671 homes beyond 2024 and to expand policy requirement to also provide safe and convenient connections to the Park and Ride.
Minor modifications will be proposed to site policy and para 7.229 to clarify that a 60% modal share will be from trips originating within the development.
A site specific IDP has been used to inform the costings in the site wide viability assessment, this then enabled an assessment to be made as to what extent contributions towards Homes England's HIF could be recycled from the scheme and what level of affordable housing could be provided.
In line with the ECC Developers' Guide an additional bullet point will be proposed to be added to include financial contributions to primary, secondary, early years education and childcare, including SEND education as required by the Local Education Authority.
Minor modification will be proposed to confirm that four new stand-alone early years and childcare nurseries could also be provided within the village centres in line with the approved planning applications for Zones 1 and 3.
The Trajectory is updated annually, and the Pre-Submission Local Plan uses the latest available Housing Site Schedule (April 2024). Minor modifications will be proposed to the Trajectory to reflect the latest published Housing Site Schedule ahead of submission (April 2026). The majority of Strategic Growth Sites rolled forward from the adopted Local Plan including greenfield sites have planning permission, resolutions to grant planning permission including North of South Woodham Ferrers, West Chelmsford, North of Broomfield, Great Leighs and North East Chelmsford.
Retain the requirement for the new all-through school to be on 'suitable' land in line with ECC's requirements. This also accords with the site Education Strategy approved alongside the planning applications for Zones 1 and 3.

Retain requirement for the development to accord with the DFD to ensure that the is planned and delivered comprehensively.
Retain reference in para 7.225 to a joint use agreement being 'secured' through the outline planning application or its s106 agreement to ensure sufficient open space will be delivered in line with the Development Standards in Appendix B and to also reflect the approved planning applications for Zones 1 and 3.
Employment requirements are not a ceiling, therefore the use of 'around' figures remains appropriate.
Retain requirement for the development to provide 20% BNG in accordance with Policy DM16. The Local Plan is supported by the plan evidence base including an updated Viability Assessment. The 20% requirement also accords with the approved planning applications for Zones 1 and 3. It is however reasonable to include additional text in the policy to state that anything over and above 20% should be capped at what can be practically delivered on site.
The need for Gypsy and Traveller provision remains to help meet needs set out in Policy S6 and S7 justified by the GTAA.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.
Reference to a 'draft' Business Plan will be proposed to be added to the Stewardship Strategy requirement as it would not be possible to have a 'full' Business Plan at this point in time.

Location 7 – Great Leighs

Strategic Growth Site Policy 7a – Great Leighs – Land at Moulsham Hall

Consultation point	**Total number of responses**
Strategic Growth Site Policy 7a – Great Leighs – Land at Moulsham Hall	10

Summary of Representations – main issues and requested changes:

- Support requirements for developments to demonstrate sufficient capacity for wastewater treatment and disposal to serve the site. Agree with recommendations in the Stage 2 Water Cycle Study 2024 that development may require a suitable phasing plan to align with our future investment plans (Anglian Water Services Ltd PSQ25-6400)
- Welcome reference to the masterplanning principle to provide or make financial contributions to new or enhanced sport, leisure and recreational facilities as justified by the Council's emerging evidence base, other plan polices and NPPF (Sport England PS25-87)
- Note changes to Strategic Policies 4 and 9 and DM16 which will address the requirement for this development to provide suitable alternative natural greenspace to provide mitigation in part for increased recreational impacts on international coastal designated sites under Essex Coast RAMS (Natural England PSQ25-6250)

- Site falls within the Eastern 2 Wide Area Multilateration Network statutory safeguarding zone meaning any development or change of use will trigger statutory consultation with us to assess impacts on the local air traffic management system. Usually this will be by virtue of the scale or height of a development, for example, developments 50m above ground level (Defence Infrastructure Organisation (DIO) PSQ25-6408)
- Add a policy requirement to protect the ecological integrity of Phyllis Currie Nature Reserve, and to provide funds to improve the resilience of the site to increased recreational impacts (Essex Wildlife Trust PSQ25-5060)
- Amend para 7.256 to clarify that Great Leighs primary school is full in most but not every year group and the scale of development in this location will 'likely' require a new primary school (Essex County Council PS25-224)
- Expand para 7.255 to include 'A safe traffic free environment around school pedestrian entrances must be provided, ensuring access for emergency vehicles only.' This will assist in this being considered at the earliest stage of the planning process and accord with Essex County Council's Developers' Guide to Infrastructure Contributions (Essex County Council PS25-225)
- Suggests amending para 7.265 by removing the text "Although this is not a barrier to new development growth", as current capacity and future permit requirements are constraints that will require alternative solutions to be investigated and considered in terms of their feasibility and deliverability. Also add 'subject to the necessary environmental permitting processes' to the end of the paragraph (Anglian Water Services Ltd PSQ25-6403)
- Objects to the plan – combined housing growth from the Chelmsford and Braintree Local Plans is too much and will put add extra traffic on an overburdened/unsuitable local road system. A supermarket and Senior School are required at Great Leighs together with a road for all traffic across the Braintree Site BLAN114 from Bakers Lane to Notley Road, to avoid the pinch points on Bakers Lane and the problems at the War Memorial Junction at Church Road/Witham Road Black Notley (Black Notley Parish Council PSQ25-481)
- Expand SGS7a to incorporate land to at School Lane (Harris Strategic Land Limited PSQ25-6038).

CCC Response
The policy includes a requirement to ensure appropriate habitat mitigation and creation is provided and the Reasoned Justification notes that this may include financial contributions towards mitigating increased recreational impacts on the nearby Nature Reserve. This allows for such contributions to be made if required and the approach is consistent with other policies and the adopted Local Plan. No change required.
Minor modification will be proposed to clarify status of Great Leighs primary school in para 7.256.
Minor modification will be proposed to provide a traffic free environment around school pedestrian entrances in para 7.255.
Minor modifications will be proposed to para 7.265 in relation to Great Leighs' WRC. Text retained in respect to wastewater capacity not being a barrier to new development growth as this is factually correct.

The site allocation, quantum and boundary are supported by the plan evidence base including the traffic modelling, IDP and Urban Area and Defined Settlement Review Technical Notes.
The site policy requires creation of a new neighbourhood centre with convenience food shopping and for appropriate improvements to the local and strategic road network as required by the Local Highways and Transportation Authority.
The 'Chelmsford City Council Housing Scenario Test – Primary and Secondary Education December 2024' confirms that there is no need to provide a new secondary school on the site.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.
Minor modifications will be proposed to ensure the development is designed in such a way that there is no impact on the operational or capability of nearby defence assets.

Strategic Growth Site Policy 7b – Great Leighs – Land East of London Road

Consultation point	**Total number of responses**
Strategic Growth Site Policy 7b – Great Leighs – Land East of London Road	4

Summary of Representations – main issues and requested changes:

- Support requirements for developments to demonstrate sufficient capacity for wastewater treatment and disposal to serve the site. Agree with recommendations in the Stage 2 Water Cycle Study 2024 that development may require a suitable phasing plan to align with our future investment plans (Anglian Water Services Ltd PSQ25-6401)
- Suggests amending para 7.280 by removing the text "Although this is not a barrier to new development growth", as current capacity and future permit requirements are constraints that will require alternative solutions to be investigated and considered in terms of their feasibility and deliverability. Also add 'subject to o the necessary environmental permitting processes' to the end of the last paragraph (Anglian Water Services Ltd PSQ25-6404)
- Note changes to Strategic Policies 4 and 9 and DM16 which will address the requirement for this development to provide suitable alternative natural greenspace to provide mitigation in part for increased recreational impacts on international coastal designated sites under Essex Coast RAMS (Natural England PSQ25-6251)
- Objects to the plan – combined housing growth from the Chelmsford and Braintree Local Plans is too much and will put add extra traffic on an overburdened/unsuitable local road system. A supermarket and Senior School are required at Great Leighs together with a road for all traffic across the Braintree Site BLAN114 from Bakers Lane to Notley Road, to avoid the pinch points on Bakers Lane and the problems at the War Memorial Junction at

Church Road/Witham Road Black Notley (Black Notley Parish Council PSQ25-482).

CCC Response
Minor modifications will be proposed to para 7.280 in relation to Great Leighs' WRC. Text retained in respect to wastewater capacity not being a barrier to new development growth as this is factually correct.
The site allocation, quantum and boundary are supported by the plan evidence base including the traffic modelling, IDP and Urban Area and Defined Settlement Review Technical Notes.
The site policy requires creation of a new neighbourhood centre with convenience food shopping and for appropriate improvements to the local and strategic road network as required by the Local Highways and Transportation Authority.
The 'Chelmsford City Council Housing Scenario Test – Primary and Secondary Education December 2024' confirms that there is no need to provide a new secondary school on the site.

Strategic Growth Site Policy 7c – Great Leighs – Land North and South of Banters Lane

Consultation point	Total number of responses
Strategic Growth Site Policy 7c – Great Leighs – Land North and South of Banters Lane	7

Summary of Representations – main issues and requested changes:

- Support requirements for developments to demonstrate sufficient capacity for wastewater treatment and disposal to serve the site. Agree with recommendations in the Stage 2 Water Cycle Study 2024 that development may require a suitable phasing plan to align with our future investment plans (Anglian Water Services Ltd PSQ25-6400)
- Note changes to Strategic Policies 4 and 9 and DM16 which will address the requirement for this development to provide suitable alternative natural greenspace to provide mitigation in part for increased recreational impacts on international coastal designated sites under Essex Coast RAMS (Natural England PSQ25-6250)
- Amend para 7.285 to clarify that the scale of development in this location will 'likely' require a new primary school and that size has not yet been determined (Essex County Council PS25-226)
- Suggests amending para 7.294 by removing the text "Although this is not a barrier to new development growth", as current capacity and future permit requirements are constraints that will require alternative solutions to be investigated and considered in terms of their feasibility and deliverability. Also add 'subject to o the necessary environmental permitting processes' to the end of the last paragraph (Anglian Water Services Ltd PSQ25-6405)
- Add a policy requirement to protect the ecological integrity of Sandylay and Moat Woods Nature Reserve, and to provide funds to improve the resilience

of the site to increased recreational impacts (Essex Wildlife Trust PSQ25-5061)

- Objects to the plan – combined housing growth from the Chelmsford and Braintree Local Plans is too much and will put add extra traffic on an overburdened/unsuitable local road system. A supermarket and Senior School are required at Great Leighs together with a road for all traffic across the Braintree Site BLAN114 from Bakers Lane to Notley Road, to avoid the pinch points on Bakers Lane and the problems at the War Memorial Junction at Church Road/Witham Road Black Notley (Black Notley Parish Council PSQ25-483)
- The current approach to defining sustainable locations for development based on settlement boundaries is overly reliant on arbitrary boundaries and a flexible greener outlook could be adopted i.e. walking distance to key services. This would ensure contribution on merit for deliverable well connected sustainable edge of settlement sites including Great Leighs (Mrs Helen Sadler PS25-28, PS25-53).

CCC Response
The policy includes a requirement to ensure appropriate habitat mitigation and creation is provided and the Reasoned Justification notes that this may include financial contributions towards mitigating increased recreational impacts on the nearby Nature Reserve. This allows for such contributions to be made if required and the approach is consistent with other policies and the adopted Local Plan. No change required.
Minot modification will be proposed to clarify status of Great Leighs primary school in para 7.285
Minor modifications will be proposed to para 7.294 in relation to Great Leighs' WRC. Text retained in respect to wastewater capacity not being a barrier to new development growth as this is factually correct.
The site allocation, quantum and boundary are supported by the plan evidence base including the traffic modelling, IDP and Urban Area and Defined Settlement Review Technical Notes.
The site policy requires creation of a new neighbourhood centre with convenience food shopping and for appropriate improvements to the local and strategic road network as required by the Local Highways and Transportation Authority.
The 'Chelmsford City Council Housing Scenario Test – Primary and Secondary Education December 2024' confirms that there is no need to provide a new secondary school on the site.
The Settlement Hierarchy is just one of several considerations for the Spatial Strategy, along with the Vision and Spatial Principles, and is considered to be a robust approach.

<u>Location 8 – Strategic Growth Site Policy 8 – North of Broomfield</u>

Key statistics:

Consultation point	**Total number of responses**
Strategic Growth Site Policy 8 – North of Broomfield	1

Summary of Representations – main issues and requested changes:

- Welcome the requirements for new or enhanced sport, leisure and recreational facilities and masterplanning principle to provide a coherent network of public open space, formal and informal sport, recreation and community space within the site. This approach is consistent with Government policy (Sport England PS25-88).

CCC Response
The support is noted.

Location 9 – Growth Site Policy 9a – Waltham Road Employment Area

Consultation point	**Total number of responses**
Growth Site Policy 9a – Waltham Road Employment Area	17

Summary of Representations – main issues and requested changes:

- Support the allocation which is a logical extension to the existing established employment area. It is in a sustainable location and can significantly contribute to employment provision (J Group and Landvest PS25-351)
- The use of 'around' 3,500sqm is supported but considered an underestimation of the allocation's potential (J Group and Landvest PS25-351)
- The policy should include Class E(g)(iii) (light industrial use) alongside B2 and B8 to ensure a sustainable employment development (J Group and Landvest PS25-351)
- The site could be expanded to include further land to the north, expanding the allocation to 3.5ha could deliver approximately 14,000sqm of employment floorspace (J Group and Landvest PS25-351)
- Support in principle but request the plan identifies Marriage Mill, Cranham Road as a new employment area (W & H Marriage & Sons Limited PSQ25-6060)
- The site falls within the Eastern 2 Wide Area Multilateration Network statutory safeguarding zone meaning any development or change of use will trigger statutory consultation with us to assess impacts the local air traffic management system. Usually this will be by virtue of the scale or height of a development, for example, developments 50m above ground level (Defence Infrastructure Organisation (DIO) PSQ25-6409)
- Object to the site expansion. The proposal does not address the likely increase and impacts of traffic on Waltham Road from other proposals and projects around Boreham or the safety risk to other road users on narrow country lanes. National Highway's Junction Assessment Report predicts that the by 2042 the junction of Waltham Road with the B1137 will be overcapacity at peak hours regardless of the A12 widening scheme. There are already large delays when the A12 is congested and the B1137 is a Designated

Emergency Diversion Route from the A12 (Boreham Parish Council PSQ25-3149)

- Traffic, especially slow-moving commercial traffic exiting the site would delay emergency vehicle responses and the site is not well served by public transport (Boreham Parish Council PSQ25-3149)
- Concerns it would generate additional traffic movements including HGV traffic through Boreham (already approaching capacity) on top of those already proposed due to the A12 widening scheme and the closure of Junction 20a. A travel plan will not promote alternatives to the use of private cars and is not enforceable. Currently most employees and users of the industrial estate arrive by motor vehicle (Boreham Conservation Society PSQ25-5255)
- The existing employment area is a bad example of town planning, an eyesore with larger industrial type operations and in an inappropriate location for employment space. The proposed buildings are not appropriate to the site and its setting and would be a considerable and unacceptable encroachment into open countryside (Boreham Conservation Society PSQ25-5255)
- The site will not provide jobs for local people, a survey of the existing employment area found only one person living in Boreham (Boreham Conservation Society PSQ25-5255)
- Existing cycle and walkways are poorly maintained (Boreham Conservation Society PSQ25-5255)
- Concern over the loss of prime agricultural land, increased flood risk and that the site lacks mains utilities (Boreham Conservation Society PSQ25-5255)
- Concerns over road safety for users of the adjacent bowling club and adverse impacts on the peace and tranquillity of the area (Boreham Bowling Club PSQ25-5736)
- National Highway's Junction Assessment Report is likely to underestimate traffic impacts on the junction of Waltham Road and Main Road
- Concerns over adverse impact on Essex Police Traffic Division at Boreham Airfield from additional traffic
- Concerns over additional traffic impacts on unsuitable local roads and at the junction off Main Road and pedestrian safety
- The policy is silent on traffic on Main Road
- There is no information on operational hours, traffic volumes and HGV numbers
- There is no travel plan and bus provision is limited
- Poor existing cycle and pedestrian walkways provision and inadequate space across the A12 bridge for a dedicated cycle route
- The current site is poorly managed with many operations spilling onto the access road creating hazards
- Concerns over landscape impacts from the new buildings and, noise and air pollution
- Concerns over loss of countryside and agricultural land
- Lack of mains utilities
- The site lies outside Boreham's DSB
- Concerns over a lack of a precise size or site boundary
- The site appears to be larger than needed.

CCC Response
The site allocation is supported by the plan evidence base including Strategic Flood Risk Assessments, Water Cycle Studies, Heritage Impact Assessment, Landscape Sensitivity and Capacity Study, Air Quality Assessment and traffic modelling.
Waltham Road Employment Area is a well-established site, and its expansion to include site 9a will provide further rural inward investment opportunities and also reflect the aspirations of national policy to support the sustainable growth and expansion of business in rural areas.
The site is proposed for expansion in the Focused Consultation Additional Sites Document to support increased housing requirements and boost employment floorspace supply. To provide flexibility, the range of employment uses on the site is proposed to be expanded to include Use Class E(g)(iii). These include a variety of industrial processes which may be suitable in residential areas without detriment to its amenity.
The site policy requires safe and convenient pedestrian and cycle links.
The development will be expected to promote the highest standards of design to minimise its impact. There must be no large-scale buildings near the northern boundary. Trees are to be retained and there needs to be new landscaping along the northern and western boundaries.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe. Transport Assessments will provide more detail on mitigation measures at planning application stage.
The Council commissioned Essex Highways to review and consider the key issues raised in the highway and transportation responses received to the consultation. This is given in Appendix 2 and includes a review of representations received from Boreham Conservation Society. Essex Highways response has been used by CCC to understand and respond to matters of concern raised in this You Said We Did report and to inform any proposed modifications to the Pre-Submission Local Plan.
Infrastructure necessary to support new development must include appropriate utility infrastructure.
The development will be expected to provide suitable measures to ensure that the amenity of nearby residents is not adversely affected such as noise attenuation measures and boundary screening.
To meet our development needs it is inevitable that some agricultural land will be used for development.
The site boundary is clearly defined on the Draft Policies Map.
The use of ‘around’ employment floorspace figures in specific site allocation policies allows for an appropriate degree of flexibility in provision.
Minor modifications will be proposed to ensure the development is designed in such a way that there is no impact on the operational or capability of nearby defence assets.

Location 14 – Ford End

Growth Site Policy 14b – Land South of Ford End Primary School

Key statistics:

Consultation point	Total number of responses
Growth Site Policy 14b – Land South of Ford End Primary School	9

Summary of Representations – main issues and requested changes:

- Support the allocation and for infrastructure requirements to be 'appropriate improvements as necessary' meaning they can be proportionate to the amount of housing on the site and not affect the viability of the development proposals coming forward (Dandara PSQ25-6297)
- The wider promoted site should be allocated for up to 50 dwellings to help deliver more community benefits (Dandara PSQ25-6297)
- The site allocation is supported. Welcome the Council's Heritage Impact Assessment and the inclusion of heritage criteria within the policy (Historic England PSQ25-5813)
- Support for the policy and would consider a higher capacity where for example, the development accords with the Parish Plan and Village Design Statement and delivers local highways improvements including traffic calming, speed restrictions and an average speed camera scheme through the village (Great Waltham Parish Council PSQ25-476)
- Unclear the reason for and the impact of a later site start date (2030/31 compared with 2029/30 in the Preferred Options) (Great Waltham Parish Council PSQ25-476)
- Support the proposal and the positive change it will bring to the local area such as ensuring the primary school remains open and a speed camera on Main Road B1008
- Para 7.330 should be amended to remove the reference to dropping-off pupils by car as this practice is not supported (Essex County Council PS25-229)
- Consider 50 homes to achieve more than the speed camera and to help pay for an Asset of Community Value
- Concerns over existing traffic and no crossing point - speed reduction measures would be necessary
- Concerns over pupil safety if the new homes would access the school from the front entrance
- Ford End is not a sustainable location and car dependent
- Concerns over highway safety impacts on houses opposite the site
- Dandara's road safety measures have already been rejected by Highways
- Suggest that the site promoter is not interested in residents' safety concerns
- Lack of school capacity
- Heritage impacts given the school is a non-designated heritage asset
- Loss of agricultural land

- Impact on neighbouring residential amenity including loss of light, privacy and air pollution.

CCC Response
The site allocation is supported by the plan evidence base including Strategic Landscape Sensitivity and Capacity Study, Air Quality Assessment and traffic modelling. The Small Sites Planning Briefs/Concept Framework 2024 (appended to the Submission Spatial Strategy and Strategic Sites Topic Paper) considers that there are no overriding site constraints which mean that the site is unsuitable or undeliverable.
The site is proposed for expansion in the Focused Consultation Additional Sites Document to support increased housing requirements.
The site is forecast to be complete in Years 2030/31 – 2034/35 to reflect the updated latest Housing Site Schedule. The Trajectory is updated annually, and the Pre-Submission Local Plan uses the latest available Housing Site Schedule (April 2024). Minor modifications will be proposed to the Trajectory to reflect the latest published Housing Site Schedule ahead of submission (April 2026).
Minor modifications will be proposed to para 7.330 to remove reference to a drop-off point for pupils at the school.
The site policy sets our development principles including access arrangements and infrastructure requirements including contributions towards education.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe. The reasoned justification recognises that speeding by vehicles on Main Road (B1008) is an issue and as such traffic calming should be provided as part of the development including speed reduction measures.
The Council commissioned Essex Highways to review and consider the key issues raised in the highway and transportation responses received to the consultation. This is given in Appendix 2 and includes a review of representations received in respect of this site relating to highway safety. Essex Highways response has been used by CCC to understand and respond to matters of concern raised in this You Said We Did report and to inform any proposed modifications to the Pre-Submission Local Plan.
The site policy requires appropriate active and sustainable travel connections to be provided within the site with links into the wider network, including the primary school. It also includes provision for appropriate improvements, as necessary, to the local and strategic road network. In addition, the development will provide a new parking area for the school adjacent to the site.
Ford End is a Service Settlement with a primary school and bus service making it suitable for small scale development. The allocation will help to support the services and facilities in the village and help to maintain a diverse housing supply.
The Council works closely with ECC as the Local Education Authority on the plan to ensure that education requirements are met.
The site policy requires the development to be set back from Main Road (B1008) and to restrict the height of new development to two-storey. Development should also be appropriate to the character of the area.
The school building has architectural interest and community value and is therefore considered to be a non-designated heritage asset. Development should avoid harm to its setting.

To meet our development needs it is inevitable that some agricultural land will be used for development.

Location 15 – Strategic Growth Site Policy 15 – Little Boyton Hall Farm Employment Area

Consultation point	**Total number of responses**
Strategic Growth Site Policy 15 – Little Boyton Hall Farm Employment Area	5

Summary of Representations – main issues and requested changes:

- Broadly support the site policy. The allocation is suitable, achievable and logical and there is demand for the additional employment land which will support the local economy. Development can be delivered in a manner which does not undermine the significance or setting of the Grade II Little Boyton Hall (CJH Farming Ltd PS25-288)
- Our Summary Landscape and Visual Appraisal for the site considers views from within the Chignal Parish area. This concludes that subject to careful design, the site could be developed without any intrinsic alteration of the landscape character or harming visual amenity (CJH Farming Ltd PS25-288)
- We welcome the Council's Heritage Impact Assessment and the inclusion of heritage criteria within the site policy. Overall, we support the site and consider it sound (Historic England PSQ25-5814)
- Support for the site allocation. Little Boyton Hall is a popular employment area with tenants, and many are looking to expand (Mr Christopher Philpot PSQ25-5334)
- There should be more flexibility to include also Use Class E(g)(i-ii) to save any ambiguity for future tenants (Mr Christopher Philpot PSQ25-5334)
- Clarity is required on the economic and environmental impact of this proposal, and how it would benefit the community. New job opportunities should be advertised within the parish first (Roxwell Parish Council PSQ25-5825)
- The A1060 is an unsafe road, and the speed limit should be extended beyond its current boundary at Boyton Hall to cover the junction with Vicarage Road (Roxwell Parish Council PSQ25-5825)
- Allocate Tarmac's Roxwell Quarry Former Plant Site as a Rural Employment Area (Tarmac PSQ25-6333).

CCC Response
The type of employment floorspace to be provided will help meet future needs as identified in the Employment Land Review 2024.
The site allocation is supported by the plan evidence base including a Landscape Sensitivity and Capacity Study 2024 and traffic modelling.
The Rural Employment Area notation applies to existing established and consolidated rural employment areas which is not the case for the Former Quarry Plant Site, Roxwell.

Strategic Policy S8 expects strategic scale planning applications (including this site allocation) to enter into an Employment and Skills Plan to provide employment and skills opportunities to benefit the local community. This may include apprenticeships, work experience, volunteering, careers information and training.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe. Transport Assessments will provide more detail on mitigation measures at planning application stage.

Growth Area 3 – South and East Chelmsford (paragraphs 7.340-7.348 and Figure 18)

Consultation point	**Total number of responses**
Growth Area 3 – South and East Chelmsford (Paragraphs 7.340-7.349 and Figure 18)	3

Summary of Representations – main issues and requested changes:

- Concern about increased traffic congestion and the burden on infrastructure that will be caused by a succession of proposed developments beyond the eastern boundary of Great Baddow (Great Baddow Parish Council PSQ25-4922)
- Traffic impact assessments have been conducted in isolation for the various developments rather than a comprehensive study of the cumulative impact of all new housing, industrial sites and growth from existing development (Great Baddow Parish Council PSQ25-4922)
- At the time of the adopted plan the A12 was regarded as the eastern boundary of Chelmsford's built-up area and would not be extended beyond that. Nothing has changed to consider this location for development now (Great Baddow Parish Council PSQ25-4922).

CCC Response
The Council's Infrastructure Delivery Plan (IDP) sits alongside the Local Plan. This assesses the current status of infrastructure across Chelmsford and identifies what new infrastructure investment is required to support the Local Plan growth, when it is needed, and funding sources.
All Highways modelling to support the Local Plan has been carried out at a strategic level, considering all proposed growth in the adopted Local Plan, background growth to 2041, neighbouring authorities' growth, and all newly proposed development sites.
Although not allocated last time, the site was considered as a 'reasonable alternative' in the Plan making process. There are no overring reasons why this site cannot be allocated when considered against the current evidence base.

Location 16 – East Chelmsford

Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm)

Key statistics:

Consultation point	**Total number of responses**
Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm)	2,911

Summary of Representations – main issues and requested changes:

- Support the allocation of the site, which represents a deliverable development in a sustainable location afforded by its proximity to both existing and planned infrastructure (Wates Developments and Hammonds Estates LLP PS25-242)
- Supports the decision to meet part of the new housing requirement with a new sustainable community alongside the A12, within reach of the new Beaulieu rail station. It is a significantly better option than the alternative of more piecemeal development at several less sustainable locations (Broomfield Parish Council PSQ25-6495)

Legal Compliance

- The consultation portal is unsound, creating significant barriers to public participation and undermining the legitimacy of the consultation process (Langford and Ulting Parish Council PSQ25-736, Little Baddow Society PSQ25-3249)
- The consultation process was inadequate, lacking sufficient engagement with relevant stakeholders, and failing to provide accessible information to all
- Alternative submission options, such as email or paper form, were available, however the paper form is difficult to complete and unclear. Submitting via email is difficult in other ways disadvantaging those who struggle with complex forms and submitting via email the user risks having their objections ignored
- The unclear guidance and lack of transparency suggests the system is designed for procedural compliance rather than meaningful engagement, violating principles of fair public consultation
- The Local Plan is legally unsound and does not comply with the Town and Country Planning (Local Planning) (England) Regulations 2012, rendering it potentially unlawful and open to legal challenge. Specifically, during Regulation 18 which required local planning authorities to notify and invite representations from residents and stakeholders during plan preparation

Duty to Cooperate

- The reasoned justification relating to the submitted Minerals Resource Assessment undertaken for the site is an accurate reflection of the situation (Wates Developments and Hammonds Estates LLP PS25-267)
- The site lies within a Minerals Safeguarding Area. It is not yet known whether the site contains a viable minerals resource that would require extraction prior to development. This should be established before allocating the site and not at the planning application stage (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6173)
- The site lies within a Minerals Safeguarding Area, and development of the site will sterilise its potential for minerals workings (Boreham Conservation Society PSQ25-5257)
- A Minerals Assessment has not been done for the site, and mineral extraction and land restoration are likely to be required before homes can be built on site. This will severely delay the site (Croudace Homes PS25-362)
- If there are minerals on site, then the same argument for not developing further within the plan period at North East Chelmsford would be the case for this site
- The consultation does not comply with the Council's Local Development Scheme (LDS) or Statement of Community Involvement (SCI) as the necessary consultation was not undertaken as Maldon Town Council and Natural England were unaware of the Pre-Submission consultation
- The Council has failed in its legal duty to conduct a genuine, inclusive, and transparent public consultation process. The consultation was inadequate, misleading, and proved inaccessible to many residents who are not regular computer users, violating key principles of democratic planning which contravenes the Planning and Compulsory Purchase Act 2004, which emphasises the importance of community involvement in the planning process
- The Pre-Submission Local Plan is inconsistent with the NPPF, for example the NPPF emphasises sustainable development and effective use of land; however, the Local Plan proposes developments that may lead to environmental degradation and unsustainable land use
- Neighbourhood Plans for Sandon and Little Baddow have recently been "made" and are supposed to carry equal weight with any other part of the Local Plan. The proposals at this site cannot be considered as consistent with either of these Neighbourhood Plans
- The Council has failed in its legal Duty to Co-operate by neglecting to properly engage with neighbouring authorities on cross-border planning issues, making the plan legally unsound. Specifically, Maldon Town Council and Natural England were completely unaware of the Site (Little Baddow Society PSQ25-3249)
- There is no evidence that that key cross-boundary strategic matters, including housing allocations, infrastructure, and environmental considerations have been effectively addressed, breaching legal obligations under the Localism Act 2011. Without clear agreements and co-operative strategies, the Plan should not be approved

Soundness

Highways

- Bullets 4, 5 and 7 under the Movement and Access section, that seek to ensure new/enhanced routes are integrated with existing active travel networks to provide suitable connections to nearby settlements, employment and recreational opportunities are supported (Wates Developments and Hammonds Estates LLP PS25-249)
- Support for the proposed highway improvements necessary to support the development in bullet point 11 and the reasoned justification. Additional highways modelling undertaken by the site promotors supports the Council's Local Plan modelling (Wates Developments and Hammonds Estates LLP PS25-252)
- Although well developed, the National Highways A12 Junction 19 Chelmsford to J25 Marks Farm improvement scheme is not guaranteed to be delivered due to the uncertain political environment. Therefore, a Local Plan traffic modelling scenario was required where the scheme is either delayed or doesn't go ahead at all. The Local Plan traffic modelling has identified a number of locations on the Strategic Road Network which would come under pressure from increased traffic flows. Namely Junctions 17,18 and 19 on the A12. National Highways previously recommended these locations need a more detailed assessment to understand the scale and nature of the impacts, ideally using a micro simulation model and if necessary suitable mitigation measures found to manage the impact on the junctions and the A12. Third party microsimulation modelling work commenced in 2024 in consultation with National Highways, Essex Highways and CCC. National Highways agreed the base model including methodology and baseline data inputs and have since received the future scenario model (including traffic associated with the Chelmsford Local Plan). We are optimistic that a lot of the issues raised will be resolved before the Examination and would like to continue working closely with CCC with the aim of resolving these issues. As part of this work we will work to develop a greater understanding of the impact of the proposed development upon the A12 and the required mitigation which should go into the IDP (National Highways PSQ25-6447)
- The allocations in the Local Plan will increase the number of residents in proximity of the Strategic Road Network (SRN), in particular site 16a. It is likely that these locations will be impacted by noise pollution from the SRN and raise the potential for exceedances of air quality standards for which extraordinary measures in the form of permeant speed restriction may need to be considered. This could help with flow and may be required as this section of the A12 reaches capacity (National Highways PSQ25-6447)
- Several polices in the proposed Local Plan set out requirements for developments to reduce the impact on or improve local air quality that does not directly relate to the Strategic Road Network and what mitigation may be required. National Highways will continue to work proactively with CCC on these matters but would recommend a specific policy which identifies how air quality and noise impacts would be monitored and managed and what interventions may be required (National Highways PSQ25-6447)

- Concerns the site could significantly impact upon traffic flows onto the A12 having an impact on businesses within Maldon and the local road network around Maldon. It is requested that consideration is given to the impacts on the local road infrastructure (Maldon District Council PSQ25-4934)
- There are significant strategic highway works required to gain access to the site. This risks the timely delivery and viability of the site (Richborough PS25-178, Gladman Developments Ltd PSQ25-6320)
- The feasibility of delivering multiple routes across, under and over the A12, via a bridge does not appear to have been fully tested (Richborough PS25-178)
- The Councils Sustainable Accessibility Mapping Appraisal concluded that the site is the worst performing of the five approaches considered in the 2022 Issues and Options Consultation (Croudace Homes PS25-362)
- Disagree that the site has the potential for a “good level” of sustainable accessibility, subject to the provision of local amenities and sustainable travel infrastructure. The Cross-Parish Working Group has commissioned Stomor to review the Council’s evidence base on highways and transport matters. This shows there are other growth options available, that are more sustainable and accessible with regards to the existing urban area and where there are already established facilities and other infrastructure and utilities upon which to build and develop. The report concludes that without suitable mitigation (which has not been demonstrated), the allocation will result in an unacceptable impact on highway safety and the residual cumulative impact on the road network will be severe (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6174)
- The planned DCO widening of the A12 corridor, between Junction 19 and Junction 25 may not proceed as the Department for Transport (DfT) is currently reviewing the project and deciding whether to fund it. If it does not go ahead the site is likely to cause a severe impact on this part of the A12 corridor, which already experiences significant congestion and frequent accidents at peak times (Croudace Homes PS25-362, Gladman Developments Ltd PSQ25-6320, Boreham Conservation Society PSQ25-5257)
- Any improvements to the A12 corridor and junctions will take many years. There is no evidence to support the proposed delivery rates of the site without these improvements (Gladman Developments Ltd PSQ25-6320)
- The assumed 60% Modal Shift, to walking, cycling, or public transport, is unrealistic given the location of the site adjacent to the A12 and its distance from employment areas. With no assurance of ongoing and effective public transport provision the site is unsustainable (Croudace Homes PS25-362, Dandara Eastern PSQ25-6212)
- There is no justification or evidence to support 60% of trips taking the form of active and sustainable travel. This figure is overly ambitious and not realistic and if this figure is not achieved the impact on the surrounding highway network will be ‘severe’, contrary to the NPPF (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6174)
- The existing footpath underpass connecting to Chancellors Park would be upgraded to a cycle route but this is within flood zone 3 and would mean that

the community would be largely cut-off during flood events to those seeking to utilise active travel (Dandara Eastern PSQ25-6212)

- Traffic impact assessments have been conducted in isolation for different aspects of the development, rather than as a holistic study of the combined effect of all new housing, commercial sites, and background growth from existing development. There are already traffic issues in the area, and this will make things worse (Langford and Ulting Parish Council PSQ25-736)
- There is congestion on the A12 between Junctions 18 and 19 and on the A414 towards Danbury and Maldon. West of Maldon there is increasing development, the prospect of mineral extraction at Woodham Walter and even construction traffic from Bradwell Nuclear Power Station will impact on the A414. Unclear if the implications of these factors outside the Council area have been taken into consideration (Little Baddow Society PSQ25-3249, Chelmer Valley Landscape Group PSQ25-5141)
- The proposed reduction in car parking provision for homes on the site is concerning and will lead to parking problems for residents of the site and neighbouring communities
- Congestion and traffic noise on the A414 will worsen due to increased vehicles, lack of proper road expansion, and the addition of a new junction near the A12. The A414 is already over capacity, with frequent delays during peak hours. There is no clear plan or funding for mitigation
- Congestion on the A12 will worsen. There is no clear strategy for how the increased traffic on the A12 will be mitigated. The planned ‘improvements’ lack sufficient funding, design detail, or binding commitments from key infrastructure stakeholders
- The Council’s evidence base identifies that development is likely to increase traffic volumes along rural routes through villages including Boreham, Little Baddow, Danbury and Sandon. It is likely that the existing rural lanes will become ‘rat runs’, to avoid queuing on the A12 and A414, and this could have many adverse consequences for the local highway network within and around these villages, and could also have negative effects in terms of the character and tranquillity of these small, historic settlements, and on the setting and character of the Protected Lanes and Conservation Areas within these areas (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6174, Boreham Conservation Society PSQ25-5257)
- The proposal will increase commuter travel times, cause severe congestion at key pinch points, and lead to greater rat-running through rural villages in the wider area and through the Chelmer Valley itself, of which no mitigation has been put forward in the Local Plan (Little Baddow Society PSQ25-3249, Woodham Walter Parish Council PSQ25-5834, Chelmer Valley Landscape Group PSQ25-5141, Boreham Conservation Society PSQ25-5257)
- The A12 at Junction 18 will not cope with the additional burden of traffic, especially considering further housing development approvals at Maldon (Woodham Walter Parish Council PSQ25-5834)
- The Plan accepts that there will need to be improvements to Junctions 18 and 19 of the A12, but there is no detail of what this will be or funding for it

- The outline planning application for 16b states that there will be tailbacks creating congestion at Junction 18, and this is without any consideration of the additional load from 16a and Location 3, or development from Maldon District
- Mitigation at Junction 19 is unclear, and additional traffic can also be expected here from development in Maldon District. Currently traffic backs up to the Lion Inn at peak times. There is no indication of where the funding for mitigation will come from. National Highways will not have funding given the recent budget cuts they have recently sustained which resulted in cancellation of other plans for enhancement of the A12
- Junction 19 will be unable to handle the additional traffic flows (Chelmer Valley Landscape Group PSQ25-5141)

Heritage

- The Council's HIAs demonstrates that measures can be put in place to appropriately address the potential impacts identified and that the Council has taken a balanced approach to managing development while safeguarding the historic environment. On the basis mitigation and enhancement measures outlined in the Council's HIAs are implemented the site is considered suitable for allocation (Historic England PSQ25-5810)
- The provision of landscaping/conservation buffers in the policy and policies map, and the requirement for proposals to be informed by the submission of a more detailed Heritage Impact Assessment and an Archaeological Desk Based Assessment to guide the site's masterplanning is welcomed (Historic England PSQ25-5810)
- Supports the Garden Community having a landscape led setting. An updated Landscape and Visual Baseline Appraisal has been carried out to appraise the objectives relating to landscape and the natural environment defined in the site policy. A Green Infrastructure Strategy is also submitted. These support that the site is suitable for development from a landscape and visual perspective, and that a high quality development in a landscape setting, working in sympathy with local landscape and heritage assets, is achievable and deliverable (Wates Developments and Hammonds Estates LLP PS25-253)
- The requirement for a "sensitively designed new bridge to mitigate harm" in relation to the Chelmer and Blackwater Navigation Conservation Area is supported and a Bridge Option appraisal of the three proposed bridge structures demonstrates that this is achievable (Wates Developments and Hammonds Estates LLP PS25-254)
- The proposal will have substantial harm to the significance of the Chelmer and Blackwater Navigation Conservation Area and will have a moderate level of harm to the significance of a large number of listed buildings, Protected Lanes, non-designated heritage assets and Registered Parks and Gardens. The high impact has not been properly justified in the plan, and the evidence base has failed to properly consider other, less harmful, options for development (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6164)
- There will be substantial harm to the significance of the Chelmer and Blackwater Navigation Conservation Area. It is unclear how the proposed access road over the waterway to Junction 19 of the A12 can be achieved

while preserving and enhancing the Conservation Area. The addition of the requirement for the bridge to be sensitively designed is not sufficient to mitigate the harm (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6164)

- The Council's Heritage Impact Assessment acknowledges that substantial harm will occur from the proposed development, which is contrary to the NPPF (CPRE Essex PSQ25-6147)
- The area contains evidence of Roman occupation. Archaeological investigations have revealed significant Roman and Iron Age activity, including burial sites and artefacts
- Aerial photography reveals historical structures that may require preservation. Recent surveys indicate the presence of subsurface remains of historical buildings and earthworks. Development without detailed archaeological assessments risks permanent destruction of unrecorded heritage sites (Langford and Ulting Parish Council PSQ25-736)
- A full field archaeology report of the site has not been undertaken, yet the desk-based archaeology report for site 16b identifies "enhanced potential for prehistoric activity". The site has a known history of Roman importance. There are also many examples of more recent heritage assets. Para 207 of the NPPF requires a full field evaluation to be undertaken
- The extent of the archaeology on site is unknown, and until an additional evaluation is undertaken, the Council does not know how much, or which parts of the site will be unavailable for development. The Local Plan is therefore based upon an incomplete evidence base, and until further archaeological investigation is undertaken to understand the extent of the constraints, it cannot be assumed that the site can accommodate the scale of development proposed (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6164)
- Policy DM15 states that planning permission will only be granted for development affecting archaeological sites providing the sites and their settings are protected, enhanced and preserved. There is no archaeology field report or evidence of how such mitigation can be achieved on site

Landscape and ecology

- Support for the policy requirements and reasoned justification to provide necessary mitigation to address the cumulative recreational pressure on SSSIs in proximity to the site and to conserve and enhance biodiversity and avoid adverse effects on nearby woodlands and wildlife sites. It should be noted that this mitigation will need to be considered separately from any mitigation measures designed to reduce impacts on internationally designated sites (Natural England PSQ25-6253)
- Support the requirement to provide high quality semi-natural greenspace of at least 12ha to meet Natural England's 8ha/1000 new population metric and minimum circular dog-walking route on or off site of 2.3km which make use of existing Public Rights of Way and/or highways (para 7.377). It is noted that mitigation for impacts on designated sites will not be able to count towards biodiversity net gain but can contribute to no net loss (Natural England PSQ25-6253)

- The development will lead to significant landscape and visual impacts in the Chelmer Valley and on landscape character generally, some of which are protected by the Boreham VDS, potentially damaging to the ecology and biodiversity of the area (CPRE Essex PSQ25-6147, Croudace Homes PS25-362, Gladman Developments Ltd PSQ25-6320, Chelmer Valley Landscape Group PSQ25-5141, Boreham Conservation Society PSQ25-5257)
- The site conflicts with NPPF paras 174 and 176, which require planning decisions to protect and enhance valued landscapes and to give “great weight” to conserving scenic beauty (CPRE Essex PSQ25-6147)
- Based on both the Amec Foster Wheeler 2017 Landscape Sensitivity and Capacity Assessment and the independent Landscape Character Assessment undertaken by the Parish Councils, the site is an area of high landscape sensitivity, where development cannot be accommodated without irrevocable harm to the distinct and ancient landscape character of the area. The Council’s evidence base acknowledges that the land parcel has a ‘low to medium capacity’ to accommodate development and that development would be “intrusive and difficult to mitigate”. The development will result in significant adverse impacts on the landscape setting and the distinctive countryside in the Danbury Ridge area. The Council has failed to demonstrate how these impacts can be adequately mitigated, or how the landscape will be conserved and enhanced (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6153, CPRE Essex PSQ25-6147)
- There will be a substantial loss of natural habitat, as a result of the urbanisation and development of the land. This should not be under-estimated and is a major harmful impact of the proposed allocation, which is not considered in detail in the Council’s evidence base (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6170)
- The site involves the loss of high-grade agricultural land which should be protected for self-sufficiency and food security for the country (CPRE Essex PSQ25-6147, Boreham Conservation Society PSQ25-5257)
- The Agricultural Land Classification Report submitted with the Outline Planning Application for development of 16b shows that land as being Grade 3a, so there is every reason to believe that the whole of the 16a site is also Grade 3a. An Agricultural Land Classification Report for site 16a is needed before a decision in made on the site’s inclusion in the Plan. Alternative sites on lower grade land have not been properly considered (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6168, Langford and Ulting Parish Council PSQ25-736, Little Baddow Society PSQ25-3249)
- The Local Plan does not take in to account the exceptional wildlife, in the Hammonds Farm area, in addition to the farmland it is bordered by the Essex Wildlife Trust, owned and managed Water Hall Meadows and Chelmer Valley Conservation Area. Detailed local surveys of sites have not been carried out (Little Baddow Society PSQ25-3249)
- The site consists almost entirely of undeveloped land, rich with trees and other habitat, and it is unclear how strategic development of the land could achieve any uplift in biodiversity, let alone a 20% net gain, especially given the

quantum of built development proposed on the land. If the biodiversity impact needs to be mitigated off-site, or through the purchase of statutory credits, this will represent a major loss of biodiversity on site, with consequences for the multitude of species that currently use the valued landscape. Moreover, basing the proposed mitigation on a standard metric / calculation, fails to take into account the rich diversity of established, natural habitat that already exists on the site, and the number and range of species that will actually be displaced by the development proposed by the allocation (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6170)

- The site will result in highly damaging impacts on rare and irreplaceable habitats and vulnerable protected species at designated sites in the area, namely Blakes Wood and Lingwood Common SSSI, Woodham Walter Common SSSI, Waterhall Meadows Local Wildlife Site/Essex Wildlife Trust nature reserve, Long Spring Wood Local Wildlife Site, Hall Wood Local Wildlife Site, Old Hare Wood Local Wildlife Site (Essex Wildlife Trust PSQ25-5062)
- Essex Wildlife Trust has been working in the area to create green corridors in Danbury and Little Baddow parishes to encourage wildlife. The development will impact negatively on this effort (CPRE Essex PSQ25-6147, Boreham Conservation Society PSQ25-5257)
- The increase in disturbance (noise, lighting, littering, cat predation) and recreational impacts resulting from the development, a few metres away from the Waterhall Meadows nature reserve boundary, will destroy the ecological integrity of this site, and most of its rare and special features will be permanently lost due to disturbance, nitrogen enrichment from dog waste, trampling of the vegetation and soil compaction and erosion (Essex Wildlife Trust PSQ25-5062)
- The site would result in a significant increased visitor pressure to the Danbury Ridge woodland SSSIs, resulting in an increase in impacts such as the trampling of ground flora, soil erosion, nutrient enrichment from dog waste and increased illegal behaviours such as littering, and the general disturbance to wildlife (Essex Wildlife Trust PSQ25-5062)
- The site lies within the Impact Risk Zone (IRZ) for Blakes Wood and Lingwood Common Site of Special Scientific Interest (SSSI) and Woodham Walter Common SSSI (Essex Wildlife Trust PSQ25-5062)
- The proposed ‘new’ Country Park will essentially follow the Chelmer and Blackwater Navigation corridor and encompass part of the site that is at high risk of flooding. The river corridor already functions as a popular informal and natural ‘country park’ and is well managed by Essex Waterways. The proposal will add no benefit in this respect but has the potential to cause substantial harm to the existing parkland, through the development of the Eastern Orbital Route, which will directly bisect the area. The new route will introduce a major transportation bridge across the canal, with associated main road infrastructure, and will drive substantial traffic through the area (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-616, PSQ25-6177, PSQ25-6172)
- The establishment of a new country park on the western boundary of the site will not be sufficient to mitigate and compensate for the impacts of greatly

increased visitor pressure on the SSSIs of the Danbury Ridge (Essex Wildlife Trust PSQ25-5062)

- It will damage an important cultural landscape which is an asset to the area and of national significance as explored by J. A. Baker (Chelmer Valley Landscape Group PSQ25-5141)
- It would have an adverse impact on the landscape of the Chelmer valley in general, with a particular adverse impact on the Chelmer and Blackwater Navigation Conservation Area (Chelmer Valley Landscape Group PSQ25-5141)
- The site will negatively impact local protected sites such as Blakes Wood and Waterhall Meadows, through increased pollution, light intrusion, and footfall. These sites provide vital habitats for diverse flora and fauna, including rare species
- The site has ancient woodlands, nearby SSSIs, and the Chelmer and Blackwater Navigation Conservation Area within it. It has very extensive animal and plant wildlife within and adjacent to it. Adding 3000+ houses and all of the people living in them will put unsustainable pressure on this deeply rural area
- The proposal would devastate a rural landscape and the high levels of biodiversity currently on site
- The plan states a 20% net biodiversity net gain should be achieved on site yet provides no explanation of how this will be achieved, especially in an area already rich in biodiversity. How can a site with existing high ecological value see a genuine net gain when vast areas of farmland, mature trees, and established habitats are lost to development
- The way biodiversity net gain is calculated does not genuinely enhance biodiversity. Loopholes can be exploited by developers. For instance, if a site currently has ten mature trees of two species and all are felled, replacing them with just four trees of different species is classified as a 100% biodiversity net-gain. This is a flawed metric which allows destruction under the guise of environmental improvement. Simply planting a few new flower species that were not previously present on site is treated as a net gain, regardless of the ecological damage done
- There should be a detailed plan showing how biodiversity net-gain will be achieved in this already ecologically sensitive area at this stage
- Alternative sites, such as further development at North East Chelmsford, have better transport links and less impact on the environment and biodiversity
- The proposal would be contrary to Policy DM8 in the Plan as the proposals would harm the intrinsic character, appearance and beauty of the area. The site is a beautiful deeply rural area, with wide open fields, surrounded by waterways, a Conservation Valley, ancient woodlands and practically no buildings. Placing 3000+ houses and industrial buildings of considerable height would be contrary to Policy DM8
- The site will affect the area's attractions for residents and visitors who come to enjoy the woodlands and miles of footpaths with views over the valley and along the Navigation towpath. The pressure on these areas (and on Danbury Lakes) from new development will become significant (CPRE Essex PSQ25-6147, Chelmer Valley Landscape Group PSQ25-5141)

Flood Risk

- The site includes substantial areas of land within Flood Zones 2 & 3 and is in very close proximity to existing waterbodies (Croudace Homes PS25-362)
- The evidence base points to a significant level of flood risk on the proposed site, particularly from reservoirs, and from fluvial flooding along the access route. The implications for the new community and the surrounding areas have not been properly considered, and alternative options have not been fully explored. Flood issues have essentially been put 'on hold', for consideration when the site comes forward, and this is not a rational or justified strategic approach, and is contrary to the requirements of the NPPF (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6167)
- The development site abuts the Chelmer and Blackwater valley. Flood risk mapping shows that parts of the proposed site regularly flood, particularly after heavy rainfall. Without substantial flood defences, development will exacerbate runoff into vulnerable areas downstream
- Climate change is increasing the severity of flood events, yet the Plan does not account for this risk. Existing flood models used in the Plan fail to factor in increased climate-driven rainfall and surface water risks. New housing in a flood-prone area increases risks to property, infrastructure, and emergency response capabilities
- Flooding has always been a problem at Hammonds and every Winter, including 2024/2025, this is increasing, inevitably with the impact of Climate Change the situation will worsen (Little Baddow Society PSQ25-3249, Boreham Conservation Society PSQ25-5257)
- Building on the site will alter water runoff patterns, increasing the risk of flooding in surrounding areas. Paving over permeable land will increase surface water runoff, overwhelming local drainage systems. The risk of downstream flooding in Boreham, Hatfield Peverel, Langford, Ulting and Maldon will rise significantly because of this development (Langford and Ulting Parish Council PSQ25-736, Boreham Conservation Society PSQ25-5257)
- The development will exacerbate flooding in the Chelmer valley, and it is not clear how sewage and wastewater from the development will be effectively dealt with. There is clearly a danger that increased flooding and waste-water discharge from a major housing development will adversely affect water quality and biodiversity in the Chelmer and its tributaries (Chelmer Valley Landscape Group PSQ25-5141)

Infrastructure

- Support for the expanded policy wording requiring the proposed development to prepare a strategy for responding to the National Grid Electricity Transmission plc overhead transmission lines within the site (National Grid Electricity Transmission PSQ25-6237)
- Support the provision of pedestrian, cycleway and bridleways within the site, the provision of a coherent network of public open space, formal and informal sport, recreation and community space, and the provision of, or making

financial contributions to, new or enhanced sport, leisure and recreation facilities (Sport England PS25-89)

- Recognition of opportunities for dual use sports facilities within the new secondary school is welcomed and justified by the Council's new sports evidence base (Sport England PS25-89)
- The timing of infrastructure will be critical to ensure that trips are not made offsite in initial phases, and the infrastructure does not come at a cost to overall affordable housing delivery (Gladman Developments Ltd PSQ25-6320)
- At this stage 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 (Richborough PS25-178)
- The amount of infrastructure required will be complex to design, agree, secure, fund and deliver, risking delays to the viability and delivery timeframes of the site (Bellway Homes Ltd (Essex) PSQ25-6361, PSQ25-6389, Dandara Eastern PSQ25-6211, Hill Residential Ltd PSQ25-3146)
- Local facilities, such as existing schools, doctors, hospitals, dentists, open space will be overwhelmed by the additional housing (Woodham Walter Parish Council PSQ25-5834)

Other

- At the time of the adopted plan the A12 was regarded as the eastern boundary of Chelmsford's built-up area and would not be extended beyond that. Nothing has changed to consider this location for development now (Croudace Homes PS25-362, Boreham Conservation Society PSQ25-5257)
- The developable site area has been reduced but the number of homes has not, even though the site's capacity was initially considered to be lower at the Issues and Options stage (Bellway Homes Ltd (Essex) PSQ25-6361, PSQ25-6389)
- Developing beyond the A12 boundary sets a precedent for further development in the future on areas of land which are sensitive landscapes
- Other options, such as further development at North East Chelmsford, have not been properly considered. The Issues and Options consultation saw five options, all of which saw an additional 3,000 homes in North East Chelmsford. When the Council was ahead of the housing target numbers North East Chelmsford was dropped and Location 16 taken forward instead
- North Chelmsford is an already urbanised area, with little in terms of landscape and wildlife of any interest. Meanwhile in Little Baddow and Danbury we have a mix of rural, good quality farmland and woodlands that are managed and preserved by The National Trust and Essex Wildlife Trust. The plan will destroy the attractiveness of the area and put unsustainable pressure on the wildlife in the area. It has not been properly justified why North East Chelmsford is not being included for further development instead of Location 16
- The site is in multiple ownerships and therefore constraints associated with land values and timely delivery where existing uses need to be stopped, will impact the ability to start timing construction (Richborough PS25-178)

- The site will result in a series of adverse impacts, many of which will result in a very high level of harm, and are why the land was not allocated for development in the current adopted Local Plan. Nothing has changed since then to support the site (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6176)
- Other land would be more suitable for such development and other reasonable alternatives have not been fully identified or assessed (J & T Wardrop and the Wardrop Trust PS25-114, Richborough PS25-178, Croudace Homes PS25-362, Dandara Eastern PSQ25-6212, Gladman Developments Ltd PSQ25-6320, Bellway Homes Ltd (Essex) PSQ25-6361, PSQ25-6389, CPRE Essex PSQ25-6147, Boreham Conservation Society PSQ25-5257)
- The site is unsustainable as it is too detached from Chelmsford to be considered as an urban extension but too close to be a new settlement (Croudace Homes PS25-362, Dandara Eastern PSQ25-6212)

Changes requested

Amount and type of development

- The amount and type of development and the delivery timeframe is supported. The tenure, type and mix of the housing provision across all site allocations will be determined by Policies DM1 and DM2. The content mix of these policies is broadly supported but consider there is an opportunity to deliver a broader mix of tenures and types on site, such as Build to Rent, intermediate rent, co-living, older persons and keyworker housing which are not reflected in the Local Plan Review's development management policies. Each of these tenures comes with its own optimal unit mix, so this could require the ability to depart from the policy mix. Propose that additional wording be added to invite consideration of a bespoke and broader housing mix on this site to the reasoned justification (Wates Developments and Hammonds Estates LLP PS25-245)
- Support the provision of two Gypsy and Traveller sites but consider the additional 13 Travelling Showpeople plots has been unjustifiably transferred from site 6 North East Chelmsford since the Regulation 18 consultation. The addition of this requirement to Site 16a does not reflect the respective scales of the two Garden Community allocations; it does not distribute needs appropriately across the district; and it will be challenging to accommodate at Site 16a in tandem with the proposed Gypsy and Traveller provision. The requirement for 13 Travelling Showpeople plots should be removed from this site policy and reinstated at site 6 (Wates Developments and Hammonds Estates LLP PS25-247)

Movement and Access

- The requirement to 'Provide Bus Based Rapid Transit Infrastructure' and the associated text in the reasoned justification should be expanded so as not to pre-judge the nature of the rapid transit measures that will be most suitable for the site, at this stage. The wording should be broadened to enable the appropriate strategy to be determined to respond to prevailing circumstances,

and through subsequent planning stages (Wates Developments and Hammonds Estates LLP PS25-251)

Historic and Natural Environment

- Bullet points 3, 4, 5, 6, 7, 8 and 9 in the Historic and Natural Environment section each include a requirement to preserve, enhance or retain the significance of particular heritage assets. This is considered a binary approach, which are not fully consistent with the NPPF, or with Council's draft Policies DM13, DM14 and DM15, which are themselves in line with the NPPF's heritage tests. These bullets could either be removed entirely, as the issue is covered by the Council's development management policies, or it should be clear that the assessment of these assets' treatment will be governed by draft Policies DM13, DM14 and DM15 (Wates Developments and Hammonds Estates LLP PS25-254)
- Bullet point 5 under Historic and Natural Environment includes a requirement to preserve and where appropriate enhance the "listed buildings, structures and setting" of a range of listed heritage assets. This part of the policy is not accurate, as only one of the quoted heritage assets (the Grade II listed Hammonds Farmhouse) physically falls within the allocation boundary. In relation to the other 14 assets quoted, the only element the allocation will have control over is the "setting" where it overlaps with the allocation. The wording should be adjusted (Wates Developments and Hammonds Estates LLP PS25-254)
- The requirement to retain the significance of Graces Walk and Hurrells Lane is supported, but there does not appear to be evidence that buffers should be either "substantial" or "extensive", and consider that this pre-judges the outcome of the masterplan process, which is acknowledged to be the appropriate stage to establish the site's detailed preservation and enhancement principles. A 'substantial buffer' into the heart of the masterplan would cause safety issues from a lack of overlooking and lighting, and unhelpfully divide the land uses such as education, employment and housing, leading to residents opting to use cars for short journeys rather than by bike or on foot. It also unduly sacrifices development land which could be contributing to meeting housing need (Wates Developments and Hammonds Estates LLP PS25-254)
- Add supporting text to clarify that proposals should adhere to the recommendations of the Council's Heritage Impact Assessment for the site (Historic England PSQ25-5810)
- Move the second heritage bullet ("Prepare a detailed Heritage Impact Assessment") to the top and reword it to emphasise that the assessment should inform both positive placemaking and the site's masterplanning (Historic England PSQ25-5810)
- Welcome the fifth heritage bullet, particularly the reference to farmsteads and landscape buffers to protect settings. However, "landscape buffers" may suggest a tree belt, whereas open space or breathing space around these assets is also important. The wording should be amended to clarify this (Historic England PSQ25-5810)
- The bullet point relating to the area to the east of Sandon Brook, which is notated as space for "Recreation/SuDS/Biodiversity", should be expanded to

allow for solar/appropriate renewable energy uses in addition to the uses listed (Wates Developments and Hammonds Estates LLP PS25-256)

- Support the allocation of space for future recreation, SuDS, and biodiversity to the east of the site, but consider that the policy should be amended to make it clear that formal sports provision, built development, or floodlighting in this area is not suitable in this area (Historic England PSQ25-5810)
- Additional landscaping should be incorporated at the northern end of the site, particularly around the Grade I listed Church of St Mary the Virgin and the Grade II listed Little Baddow Hall, to reinforce their setting and help mitigate visual impacts of new development (Historic England PSQ25-5810)
- The requirement to undertake an Archaeological Assessment and conserve existing archaeological features could be interpreted to imply that all archaeological remains found within the site would be of such a high level of significance that they would all warrant retention. The Archaeological and Heritage Appraisal submitted shows no current evidence that demonstrates any remains on site are of such a high level of significance that such mitigation is warranted. The requirement should be amended or removed and such matters dealt with by Policy DM15 (Wates Developments and Hammonds Estates LLP PS25-258)
- Support the requirement to provide necessary mitigation in relation to cumulative recreational pressure on local SSSIs. However, the reasoned justification refers to providing semi-natural greenspace to 'meet Natural England's 8ha/1000 new population metric and minimum circular dog-walking route on or off site of 2.3km'. If this scale of mitigation is to be expected in relation to the local SSSIs, the area provided must be able to double up as Suitable Alternative Natural Greenspace (SANG) if such is required for potential recreational impacts on the Blackwater Estuary SPA (Policy DM16). Additional wording should be added setting this out (Wates Developments and Hammonds Estates LLP PS25-257)
- Taken as a whole the mosaic of habitats across Danbury Ridge is an important landscape for wildlife. The site should include the requirement to undertake a SSSI Impact Assessment, and the reasoned justification text requiring developers to work closely with local stakeholders should be moved into the policy itself (National Trust PS25-176)
- The site could indirectly impact the SSSIs through cumulative recreational pressure without appropriate mitigation measures. Impacts on the SSSIs and Ancient Woodlands should be assessed at the Local Plan stage and scale, rather than for individual planning applications, so that cumulative impacts for the plan period can be adequately assessed and appropriate mitigation secured (National Trust PS25-176)
- Broadly support the application of a higher policy target of 20% for biodiversity net gain. Early calculations indicate that this target would be achievable. The reasoned justification references 'subject to site constraints'. This is interpreted as 20% specifically limited to what is practically deliverable onsite and not the expectation that offsite provision or credit top ups could be sought to reach the higher target value of 20%, as having to buy credits off site could hamper viability. The policy and reasoned justification should be amended to state this requirement should be capped at what can be practically delivered onsite (Wates Developments and Hammonds Estates LLP PS25-242)

Site infrastructure requirements

- Reference should be added to the requirements and reasoned justification relating to education provision being proportionate to pupil yield generated from the development, so that its delivery and funding at the time allows for Section 106 contributions from other developments locally to contribute as required (Wates Developments and Hammonds Estates LLP PS25-260)
- To ensure the education provision meets the identified need created by the site, and reflects the appropriate range of delivery scenarios, it is considered necessary to extend the reasoned justification to reflect the option to deliver the school directly (Wates Developments and Hammonds Estates LLP PS25-262)
- Strongly support any SEND provision within the site and request consideration is given to changing one of the schools on the site to a SEND school or making provision for an additional SEND school on the site (Maldon District Council PSQ25-4931)
- Add an additional bullet under 'Site infrastructure requirements' in line with the ECC Developers' Guide to read: Financial contributions to primary, secondary, early years education and childcare, including SEND education as required by the Local Education Authority (Essex County Council PS25-233)
- Reasoned Justification should include reference to a safe traffic free environment around school pedestrian entrances being provided, ensuring access for emergency vehicles only (Essex County Council PS25-231)
- Primary healthcare provision at the site is supported, but the requirement in relation to healthcare provision should be limited to primary healthcare; there is no justification for strategic health needs to be met via planning obligations. The new requirement for facilities to support police, ambulance, fire and rescue facilities should also be removed as it is too broad and needs to be specific and evidenced (Wates Developments and Hammonds Estates LLP PS25-260)
- Support the section on stewardship but suggest a draft business plan is sufficient to be provided as part of the planning application (Wates Developments and Hammonds Estates LLP PS25-266)
- The proposed link road to A12 Junction 19 will be elevated above the flood plain and its embankments will slow down discharge of surface water increasing the risks of flooding up stream, it will split any proposed development in two, and compromise the views to and from the Listed Boreham House, and its separately listed grounds (Boreham Conservation Society PSQ25-5257)

Other

- The upper limit placed on the size of a proposed convenience store, as 500sqm should be removed as a larger food store is expected to be needed for the purpose of supporting internal trips within the garden community and minimising vehicle trips offsite (Wates Developments and Hammonds Estates LLP PS25-260)
- Reference to the planning and design of development to be required to encourage healthy and active lifestyles in line with the Active Design guidance

is particularly welcomed. However, reference to Public Health England should be removed from paragraph 7.361 to ensure that the plan is accurate as Public Health England no longer exists (Sport England PS25-89)

- For consistency across the Local Plan the site policy should be amended to state that the masterplan must be in place prior to the determination of any planning application, as is the case for other strategic sites (Wates Developments and Hammonds Estates LLP PS25-269)
- There should be a requirement to utilise the potential of the Chelmer & Blackwater Navigation for recreational use for the benefit of the development and its proposed Country Park, including consideration of Chelmsford Canoe Club (Essex Waterways Ltd PSQ25-5218, Chelmsford Canoe Club PS25-255)
- There should be a requirement to utilise, link and provide financial contributions to the proposed Visitor Centre at Sandford Mill (Essex Waterways Ltd PSQ25-5218)
- It would improve clarity if the reasoned justification were amended to include specific reference to flood risk management infrastructure to reiterate the requirement for financial contributions towards CFRPP as set out in the Council's Level 2 SFRA (Environment Agency PSQ25-6289).

CCC Response
Legal compliance and Duty to Cooperate
The consultation followed CCC's adopted Statement of Community Involvement (SCI) and Local Development Scheme (LDS).
In accordance with the Council's SCI, the consultation was fully accessible to all, with paper and electronic documentation being available to all, and in person drop in events for all to attend.
The 'Pre-Submission (Regulation 19) Statement of representation procedure and statement on availability of proposed submission documents for inspection' is fully transparent in what the consultation covered, where to view the documents, and how to make comments, as well as how to contact the Council if they required assistance. The statement covered the following to assist anyone in making their comments: • PART 1 – What is a Regulation 19 Consultation • PART 2 – Legal Compliance and Duty to Co-operate • PART 3 – Soundness • PART 4 – Where can I view the consultation documents? • PART 5 – How can I comment? • PART 6 – Appearing at Independent Examination • PART 7 – What will happen with my representation? • PART 8 – Statement on availability of proposed submission documents for inspection • PART 9 – Other consultations
The consultation portal is only one means of submitting representations. Representations made by email or post are inputting into the consultation portal by the Council and carry the same weight as those submitted via the consultation portal.
Detailed, step-by-step guidance for using the consultation portal was published specifically to guide users on how to make comments on the events for this consultation.

The two Regulation 18 consultations were fully compliant with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), with all relevant bodies being correctly notified of the consultations. Full details of those consulted are set out in the following documents: • Issues and Options 'You Said We Did' Feedback Report (May 2024) • Preferred Options 'You Said We Did' Feedback Report (February 2025)
The Pre-Submission Regulation 19 consultation was fully compliant with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), with all relevant bodies being correctly notified of the consultations. Full details of those consulted are set out in Appendix 1 to this report.
Natural England have been fully engaged throughout the Local Plan process resulting in a Statement of Common Ground being agreed with the Council in December 2024 (SOCG014 refers).
In accordance with the Duty to Co-operate (in place at the time), the Council has engaged with all neighbouring Local Authorities, including Maldon District Council, and identified any Strategic matters to be considered through the Local Plan process. An updated Duty to Co-operate Strategy was published in January 2022 (DTC003) with the most recent Duty to Co-operate Position Statement, November 2025 (DTC005) setting out the latest update on the activities undertaken by the Council in respect to the Duty to Co-operate on the Review of the adopted Local Plan. Further evidence of cooperation is contained in Statements of Common Ground (SOCG).
Neighbouring Local Authorities who have an adjoining boundary with CCC were required to be consulted under the Duty to Co-operate (in place at the time). Neighbouring Parish/Town Councils were required to be consulted at each stage of the Local Plan, but not as part of the Duty to Co-operate. Maldon Town Council is a Parish/Town level Council which is located within Maldon District and therefore does not comprise a Duty to Co-operate body. As the Town Council does not have a boundary with CCC there is no requirement to directly consult Maldon Town Council. Maldon District Council, with Maldon Town Council within its administrative area, is a Duty to Co-operate body which the Council have fully engaged with, and an updated Statement of Common Ground was agreed with the Council in 2026 (SOCG010 refers).
Collectively the Local Plan evidence supports the site allocation, and the site policy allows for appropriate mitigation and infrastructure to be secured where necessary, resulting in sustainable development, consistent with the NPPF.
A Minerals Recourse Assessment (MRA) has been carried out and considered by the Essex County Council, as the Minerals Planning Authority. They have acknowledged that working of the full mineral deposit would not be compatible with the proposed non-mineral development. However, the MRA does indicate that there is a workable mineral resource that would be sterilised by the development. Any planning application will need to demonstrate that the need for the built development is such that it outweighs the sterilisation of the mineral resource.
The minerals siltation in North East Chelmsford differs as that site has an extant planning permission for mineral extraction. The minerals must therefore be exacted before any other form of development can take place on the site. There is no minerals extraction permission for this proposed site.

Site allocations are strategic matters for the Local Plan, but where applicable the made Neighbourhood Plans include detailed design and other guidance which can influence future detailed development proposals and planning applications.
Amount and type of development
For consistency across the Local Plan the site policy has been amended to state that the masterplan must be in place prior to the determination of any planning application, as is the case for other strategic sites.
The requirement for 13 Travelling Showpeople plots is required on this site as Strategic Growth Site 6 has seen its Travelling Showpeople provision replaced with additional Gypsy and Traveller provision. The latest GTAA has additional Travelling Showpeople requirements and as one of the largest strategic site allocations in the Plan 16a is required to make this provision.
No need to expand Reasoned Justification to cover wider prescribed tenures as paragraph 7.357 covers this with standard text relation to size and type of dwellings, which is used consistently across the Plan and allows for a variety of types/tenures, where a need can be demonstrated.
Restricting the size of a main unit for convenience food shopping is considered an appropriate industry standard which would not lead to an adverse impact on the City Centre and is consistent across the Plan. Proposals over 500sqm would be required to undertake an impact assessment in accordance with Strategic Policy S12 in line with requirements of the NPPF.
Highways
The Council commissioned Essex Highways to review and consider the key issues raised in the highway and transportation responses received to the consultation. This is given in Appendix 2 and includes a review of representations received from Walshingham Planning on behalf of Little Baddow, Sandon, Boreham & Danbury Parish Councils, Wates Developments and Hammonds Farm, Gladman Developments Ltd, Maldon District Council, and Boreham Parish Council. Essex Highways response has been used by CCC to understand and respond to matters of concern raised in this You Said We Did report and to inform any proposed modifications to the Pre-Submission Local Plan.
There is no proposal to reduce the amount of car parking for this site. The site will need to comply with the same parking standards as any other site, as out in Policy DM27.
Reference to an ‘unimpeded’ route for rapid transit bus services needing to be shown in the masterplan amended to allow for the masterplan to demonstrate a choice of suitable route corridors as it is not yet established that such routes must be unimpeded. However, reference to the need for such routes to prioritise busses added. The masterplan will determine the routes.
All Highways modelling to support the Local Plan has been carried out at a strategic level, considering all proposed growth in the adopted Local Plan, background growth to 2041, neighbouring authorities’ growth, and all newly proposed development sites.
It is recognised that many of the operational issues affecting the A12 and its junctions are not directly attributable to proposed growth within the Chelmsford Local Plan, but an existing issue. Accordingly, developers of local plan allocations will be required to make relevant mitigation measures proportionate to the impact they have.

The strategic modelling has highlighted the broad potential impact of development, which will be used as evidence to ensure that developers of sites assess and mitigate the specific impact of development flows on local routes.
Continued work with National Highways has resulted in a statement of common ground with National Highways and Essex County Council (SOCG033 refers) with all parties agreeing that the Local Plan modelling to date indicates that the development in the Local Plan would have minimal impact upon the A12 and Junctions 17,18 and 19. Further modelling assessments with regards to these junctions are not required for the purposes of the Local Plan, and no modifications are required to be proposed to the Plan. With proportionate and reasonable mitigation strategies in place to support the Local Plan growth, development will ensure that severe impacts on the strategic highway network are avoided.
Detailed traffic modelling is being undertaken to identify the transport impacts arising from the development and to determine what mitigation may be required at Junction 19,18 and 17.
In light of the withdrawal of the A12 DCO, detailed traffic modelling is being undertaken to establish whether additional growth proposed through the Local Plan would necessitate mitigation at Junction 19 over and above that is already being progressed in association with the North East Chelmsford Graden Community.
Historic Environment
Historic England support CCC's Heritage Impact Assessment (HIA) and considers that it demonstrates measures can be put in place to appropriately address the potential impacts identified and that the Council has taken a balanced approach to managing development while safeguarding the historic environment. On the basis mitigation and enhancement measures outlined in the Council's HIA are implemented the site is considered suitable for allocation.
The Councils heritage impact assessment identifies a large number of designated and non-designated heritage assets in the vicinity of the site and finds varying levels of harm to their settings'. All harm is less than substantial and mitigation measures are proposed to minimise this harm. Given the scale of development required to meet the need and the rural character of the site there will always be impacts on the historic environment. This harm will be minimised through the masterplanning and mitigation strategies. The remaining harm will have to be weighed up against the benefits of delivering the scheme.
Minor modifications will be proposed to the policy and reasoned justification to reflect Historic England's requests to include reference to the Council's heritage impact assessment, the need for a detailed Heritage Impact Assessment to inform the masterplan, defining the landscape buffers as being open, and additional bullet point requiring landscaping to be incorporated at the northern end of the site, particularly around the Grade I listed Church of St Mary the Virgin and the Grade II listed Little Baddow Hall.
The landscape area to the east is highly sensitive so solar renewables are not considered acceptable in this area. Any such proposals would be better incorporated into buildings or less sensitive areas. No changes proposed but reference to no built form in this area added for clarity.
Minor modifications will be proposed to the Policy to ensure heritage impacts shall be avoided or minimised through the masterplan strategy, informed by the heritage assessment, remaining harms shall be mitigated where possible, with the remaining harm weighed up in accordance with policies DM13, DM14 and DM15.

As Hammonds Farm is the only designated heritage asset within the red line area. Wording has been revised to clarify this.
The landscape setting is a key feature of this allocation and therefore 'substantial and extensive buffers' are required for mitigation. The use of alternative phrases such as 'appropriate' would not give sufficient clarity. No changes proposed.
Minor modifications will be proposed to Archaeological Assessment requirements to allow an informed conservation/mitigation strategy to be developed for significant archaeological heritage assets and for any remains found to be treated appropriately according to their level of significance and in line with Policy DM15.
Paragraphs 7.371 and 7.372 will be proposed to be swapped to ensure clarity, with the heritage issues being grouped together in the Reasoned Justification.
Landscape/environment/flood risk
Reference to Lingwood Common SSSI and Woodham Walter Common SSSI will be proposed to be added as areas to avoid adverse effect on.
Natural England are in agreement with the policy requirements and Reasoned Justification relating to assessing the impact on the SSSIs and Ancient Woodlands. No further changes required.
Additional text will be proposed to be added to the reasoned justification to make it clear that the provision of greenspace on site would simultaneously provide recreational mitigation for potential impacts on the Essex Coast international designations, if required as identified in paragraph 8.139 of DM16.
There is no need to make specific reference to the need for flood risk management infrastructure to include contributions to the CFRPP as this is covered in Strategic Policy S9 – Infrastructure requirements. The Plan should be read as a whole and this would be unnecessary duplication as the site policy directly refers to Policy S9 and S10.
Whilst the site is at risk from reservoir flooding, the risk is very low. The 'high' risk rating of a reservoir indicates that in the event of an uncontrolled release the impacts could be severe, rather than that there is a high risk of a breach occurring. High risk' reservoirs are managed more stringently to minimize the chances of an uncontrolled release occurring. Measures to mitigate reservoir risk would not increase risk elsewhere.
The Site Summary Table for SGS16a in the Strategic Flood Risk Assessment Level 2 (EBCC010) sets out how flood risk can be managed safely including advice on access and egress. A Sequential and Exception Test (CC013) and update May 2026 (CC021) also recommends allocation of the site.
Developers will need to demonstrate through a site-specific Flood Risk Assessment (FRA) that users of the site will be safe from all sources of flood risk throughout its lifetime and that the development will not increase the risk of surface water flooding on the site and to neighbouring areas.
It is the role of the Council and not the SFRA to consider alternative sites. The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. This includes in relation to flood risk as set out in the Sequential and Exception Test update May 2026 (CC021).
The Strategic Flood Risk Assessment Level 2 (CC010) includes a climate change allowance.

The Detailed Water Cycle Study 2024 (CC003) shows that the site can be adequately served by Chelmsford Water Recycling Centre (WRC) in respect to wastewater collection and treatment.
Retain requirement for the development to provide 20% BNG in accordance with Policy DM16. The Local Plan is supported by the plan evidence base including an updated Viability Assessment. It is however reasonable to include additional text in the policy to state that anything over and above 20% should be capped at what can be practically delivered on site. Minor modification will be proposed to this effect.
Site infrastructure requirements
The Council's Infrastructure Delivery Plan (IDP) sits alongside the Local Plan. This assesses the current status of infrastructure across Chelmsford and identifies what new infrastructure investment is required to support the Local Plan growth, when it is needed, and funding sources. The Local Plan viability report uses the information from the IDP to test viability. This demonstrates that the plan is viable and deliverable within the timeframes suggested. This is a 'living' document that will be reviewed to ensure the most up-to-date information is used to inform the planning application process.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.
Although not allocated last time, the site was considered as a 'reasonable alternative' in the Plan making process. There are no overring reasons why this site cannot be allocated when considered against the current evidence base.
The Plan should be read as a whole, no need to add reference to education or other infrastructure requirements being proportionate to the development as this is covered by policy S9 and S10 in the Plan, which deal with the provision of infrastructure and cover this issue. No change proposed.
Additional text added to Reasoned Justification to ensure a safe traffic free environment around school pedestrian entrances must be provided, ensuring access for emergency vehicles only, in line with ECC requirements.
As school providers, it is not ECC's position to accept the direct delivery of schools. No change proposed.
In line with the ECC Developers' Guide an additional bullet point added to include financial contributions to primary, secondary, early years education and childcare, including SEND education as required by the Local Education Authority.
Retain reference to the need for infrastructure to support police, ambulance and fire and rescue services as evidence has been submitted by these services to support the need for this requirement, which has been included in site policies across the Plan.
Limiting healthcare service to 'Primary' healthcare only would be too restrictive. The wider term 'Healthcare' covers all necessary infrastructure required by the development and is consistent with all other site policies in the Plan.
Adding reference to 'significant' adverse environmental impacts in relation to the appropriate development of renewable, low carbon and decentralised energy schemes on this site together with mass waste collection systems is not considered consistent with the NPPF as paragraph 160 of the 2023 NPPF does not include such reference.

Paragraph 7.375 refers to the need for the site to maximise opportunities for river use in accordance with the Council's Waterways Strategy which covers wider river uses than just referring to individual clubs or groups, whose names may change over time, or additional clubs or groups may be formed.
It would not be reasonable to require site 16a to make financial contributions to a proposed visitor centre at Sandford Mill as no other sites, other than 3a (due to it being directly adjacent to it) contribute towards Sandford Mill.
Stewardship
Reference to a 'draft' Business Plan will be proposed to be added to the Stewardship Strategy requirement as it would not be possible to have a 'full' Business Plan at this point in time.
For consistency with Strategic Growth Site 6, and to ensure unnecessary and costly services charges are not incurred by residents on site, text retained in Reasoned Justification to ensure if services charges are required these are minimised and capped.
Other
It is noted that 'Public Health England' has been replaced by 'UK Health Security Agency (UKHSA)' but the Sport England and Public Health England's Active Design guidance has not been updated to reflect this, so the Plan remains up to date.

Strategic Growth Site Policy 16b – Land adjacent to A12 Junction 18 Employment Area

Consultation point	Total number of responses
Strategic Growth Site Policy 16b – Land adjacent to A12 Junction 18 Employment Area	2,792

Summary of Representations – main issues and requested changes:

Legal Compliance

- The consultation portal is unsound, creating significant barriers to public participation and undermining the legitimacy of the consultation process (Langford and Ulting Parish Council PSQ25-734, Little Baddow Society PSQ25-3251)
- The consultation process was inadequate, lacking sufficient engagement with relevant stakeholders, and failing to provide accessible information to all
- Alternative submission options, such as email or paper form, were available, however the paper form is difficult to complete and unclear. Submitting via email is difficult in other ways disadvantaging those who struggle with complex forms and submitting via email the user risks having their objections ignored
- The unclear guidance and lack of transparency suggests the system is designed for procedural compliance rather than meaningful engagement, violating principles of fair public consultation

- The Local Plan is legally unsound and does not comply with the Town and Country Planning (Local Planning) (England) Regulations 2012, rendering it potentially unlawful and open to legal challenge. Specifically, during Regulation 18 which required local planning authorities to notify and invite representations from residents and stakeholders during plan preparation

Duty to Cooperate

- The consultation does not comply with the Council's Local Development Scheme (LDS) or Statement of Community Involvement (SCI) as the necessary consultation was not undertaken as Maldon Town Council and Natural England were unaware of the Pre-Submission consultation
- The Council has failed in its legal duty to conduct a genuine, inclusive, and transparent public consultation process. The consultation was inadequate, misleading, and proved inaccessible to many residents who are not regular computer users, violating key principles of democratic planning which contravenes the Planning and Compulsory Purchase Act 2004, which emphasises the importance of community involvement in the planning process
- The Pre-Submission Local Plan is inconsistent with the NPPF, for example the NPPF emphasises sustainable development and effective use of land; however, the Local Plan proposes developments that may lead to environmental degradation and unsustainable land use
- Neighbourhood Plans for Sandon and Little Baddow have recently been "made" and are supposed to carry equal weight with any other part of the Local Plan. The proposals at this site cannot be considered as consistent with either of these Neighbourhood Plans
- The Council has failed in its legal Duty to Co-operate by neglecting to properly engage with neighbouring authorities on cross-border planning issues, making the plan legally unsound. Specifically, Maldon Town Council and Natural England were completely unaware of the Site (Little Baddow Society PSQ25-3251)
- There is no evidence that that key cross-boundary strategic matters, including housing allocations, infrastructure, and environmental considerations have been effectively addressed, breaching legal obligations under the Localism Act 2011. Without clear agreements and co-operative strategies, the Plan should not be approved
- A Minerals Resource Assessment has been carried out which demonstrates that the ground conditions are unlikely to represent a suitable or sufficient sand and gravel resource to warrant viable use of the site for mineral extraction. It is not considered that mineral extraction of the site can feasibly be required, and minerals are not, therefore, a constraint to its timely development for employment use (Pigeon (Sandon) Ltd PS25-238)
- A Minerals Assessment has not been done for the site
- If there are minerals on site, then the same argument for not developing further within the Plan period at North East Chelmsford would be the case for this site
- The site lies within a Mineral Safeguarding Area and the minerals on the site should not be sterilised by development ()

- The site lies within a Minerals Safeguarding Area, and development of the site will sterilise its potential for minerals workings (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6179, PSQ25-6181, PSQ25-6188, PSQ25-6185, Boreham Conservation Society PSQ25-5259)

Soundness

Amount and type of development

- The proposed allocation for employment development is justified, effective, consistent with national policy, and helps ensure the new Local Plan can be considered positively prepared (Pigeon (Sandon) Ltd PS25-238)
- Concern regarding the impact this site could have on the economy of the Maldon District if businesses within the Maldon district find this site more attractive due to its proximity to the A12 for the distribution of goods, resulting in a relocation of their business to this site. If this is the case, there could be a loss of jobs within the Maldon district, resulting in fewer employment opportunities for Maldon residents and impact on the local economy (Maldon District Council PSQ25-4932)
- No specific concerns over the soundness of this policy but would like to emphasise the importance of ensuring that the delivery of this site does not place an undue burden on cross-boundary infrastructure and is adequately supported by local infrastructure improvements, including enhanced North-South public transport and active travel infrastructure to take account of the additional pressure on the county's highways network created by this quantum of employment space. Welcome opportunities for further discussions to ensure the site can come forward in a way that is environmentally, economically and socially sustainable (Brentwood Borough Council PSQ25-6160, Rochford District Council PSQ25-6195)

Highways

- In terms of vehicular movements and impact on the highway network of this site, it benefits from its proximity to the strategic road network, limiting impact on local highways. The Transport Assessment submitted within the planning application includes an appraisal of the traffic likely to be generated and considers the impact of the site's development on the capacity and safety of the highway network. It shows that development of the site is not forecast to give rise to material increases in traffic flow beyond A12 Junction 18 and the site access works. The assessments confirm that the site access and off-site junctions of interest would continue to operate satisfactorily with the development in place, subject to completion of the embedded mitigation works, even accounting for the forecast increase in vehicular movements up to 2036 (Pigeon (Sandon) Ltd PS25-238)
- The assumed 60% Modal Shift, to walking, cycling, or public transport, is unrealistic given the location of the site adjacent to the A12 and its distance from employment areas. With no assurance of ongoing and effective public transport provision the site is unsustainable

- The proposed reduction in car parking provision for homes on the site is concerning and will lead to parking problems for residents of the site and neighbouring communities
- Traffic impact assessments have been conducted in isolation for different aspects of the development, rather than as a holistic study of the combined effect of all new housing, commercial sites, and background growth from existing development. There are already traffic issues in the area, and this will make things worse (Langford and Ulting Parish Council PSQ25-734)
- The development is expected to have a severely harmful impact on the operation of the highway network (A12 and A414), which is already congested and at capacity in the peak hours, and the existing dual A12 carriageways are not due to be widened as part of the strategy. The scheme will also impact upon the local rural roads, adversely affecting small villages such as Sandon and Danbury, as drivers seek alternative routes through the countryside. This will have a harmful impact on the historic setting of these villages, and will also pose serious highways safety risks (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6186, PSQ25-6179, PSQ25-6181, PSQ25-6188)
- There is congestion on the A12 between Junctions 18 and 19 and on the A414 towards Danbury and Maldon. West of Maldon there is increasing development, the prospect of mineral extraction at Woodham Walter and even construction traffic from Bradwell Nuclear Power Station will impact on the A414. Unclear if the implications of these factors outside the Council area have been taken into consideration (Little Baddow Society PSQ25-3251, Chelmer Valley Landscape Group PSQ25-5145)
- The planned DCO widening of the A12 corridor, between Junction 19 and Junction 25 may not proceed as the Department for Transport (DfT) is currently reviewing the project and deciding whether to fund it. If it does not go ahead the site is likely to cause a severe impact on this part of the A12 corridor, which already experiences significant congestion and frequent accidents at peak times (Boreham Conservation Society PSQ25-5259)
- Congestion on the A414 will worsen due to increased vehicles, lack of proper road expansion, and the addition of a new junction near the A12. The A414 is already over capacity, with frequent delays during peak hours. There is no clear plan or funding for mitigation
- Concern the site could significantly impact upon traffic flows onto the A12 having an impact on businesses within Maldon and the local road network around Maldon. It is requested that consideration is given to the impacts on the local road infrastructure (Maldon District Council PSQ25-4936)
- Congestion on the A12 will worsen. There is no clear strategy for how the increased traffic on the A12 will be mitigated. The planned ‘improvements’ lack sufficient funding, design detail, or binding commitments from key infrastructure stakeholders
- The Council’s evidence base identifies that development is likely to increase traffic volumes along rural routes through villages including Boreham, Little Baddow, Danbury and Sandon. It is indeed entirely likely that the existing rural lanes will become ‘rat runs’, to avoid queuing on the A12 and A414, and this could have many adverse consequences for the local highway network within and around these villages, and could also have negative effects in terms of the character and tranquillity of these small, historic settlements, and on the

setting and character of the Protected Lanes and Conservation Areas within these areas (Boreham Conservation Society PSQ25-5259)

- The proposal will increase commuter travel times, cause severe congestion at key pinch points, and lead to greater rat-running through rural villages in the wider area and through the Chelmer Valley itself, of which no mitigation has been put forward in the Local Plan (Little Baddow Society PSQ25-3251, Woodham Walter Parish Council PSQ25-5835, Chelmer Valley Landscape Group PSQ25-5145, Boreham Conservation Society PSQ25-5259)
- The A12 at Junction 18 will not cope with the additional burden of traffic, especially considering further housing development approvals at Maldon (Woodham Walter Parish Council PSQ25-5835)
- The Plan accepts that there will need to be improvements to Junctions 18 and 19 of the A12, but there is no detail of what this will be or funding for it
- The outline planning application for 16b states that there will be tailbacks creating congestion at Junction 18, and this is without any consideration of the additional load from 16b and Location 3, or development from Maldon District
- Mitigation at Junction 19 is unclear, and additional traffic can also be expected here from development in Maldon District. Currently traffic backs up to the Lion Inn at peak times. There is no indication of where the funding for mitigation will come from. National Highways will not have funding given the recent budget cuts they have recently sustained which resulted in cancellation of other plans for enhancement of the A12
- Junction 19 will be unable to handle the additional traffic flows (Chelmer Valley Landscape Group PSQ25-5145)

Landscape and ecology

- The planning application for the site includes a Landscape and Visual Impact Assessment which sets out that as with any development of greenfield land, there will be localised landscape impacts. However, it demonstrates that the site is appropriate for development from a landscape and visual impact perspective; and that the landscape and visual harms of the development can be substantially mitigated through landscaping (Pigeon (Sandon) Ltd PS25-238)
- Development of the site gives rise to the potential to deliver ecological benefits. The submitted planning application is accompanied by a Biodiversity Net Gain Assessment, which confirms that the development proposed can achieve a 19.59% gain in habitat biodiversity units, a 163.89% net gain in hedgerow biodiversity units on the site, and a net gain of 20.02% in watercourse units along Sandon Brook. This comfortably exceeds the minimum requirements of the Environment Act 2021 as well as that proposed in Policy DM16 (Pigeon (Sandon) Ltd PS25-238)
- Complete erosion of a large area of locally distinctive and valued landscape. The proposal will irreversibly urbanise a tranquil, scenic rural area, where development has historically been prohibited (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6184, PSQ25-6179, PSQ25-6181, PSQ25-6188)
- The site will negatively impact local protected sites such as Blakes Wood and Waterhall Meadows, through increased pollution, light intrusion, and footfall.

These sites provide vital habitats for diverse flora and fauna, including rare species

- The site has ancient woodlands, nearby SSSIs, and the Chelmer and Blackwater navigation within it. It has very extensive animal and plant wildlife within and adjacent to it. Adding 3000+ houses and all the people living in them will put unsustainable pressure on this deeply rural area
- Essex Wildlife Trust has been working in the area to create green corridors in Danbury and Little Baddow parishes to encourage wildlife. The development will impact negatively on this effort (Boreham Conservation Society PSQ25-5259)
- The proposal would devastate a rural landscape and the high levels of biodiversity currently on site
- The development will lead to significant landscape and visual impacts in the Chelmer Valley and on landscape character generally, some of which are protected by the Boreham VDS, potentially damaging to the ecology and biodiversity of the area (Chelmer Valley Landscape Group PSQ25-5145, Boreham Conservation Society PSQ25-5259)
- It will damage an important cultural landscape which is an asset to the area and of national significance as explored by J. A. Baker (Chelmer Valley Landscape Group PSQ25-5145)
- It would have an adverse impact on the landscape of the Chelmer valley in general, with a particular adverse impact on the Chelmer and Blackwater Navigation Conservation Area (Chelmer Valley Landscape Group PSQ25-5145)
- The Plan states a 20% net biodiversity net gain should be achieved on site yet provides no explanation of how this will be achieved, especially in an area already rich in biodiversity. How can a site with existing high ecological value see a genuine net gain when vast areas of farmland, mature trees, and established habitats are lost to development
- The way biodiversity net gain is calculated does not genuinely enhance biodiversity. Loopholes can be exploited by developers. For instance, if a site currently has ten mature trees of two species and all are felled, replacing them with just four trees of different species is classified as a 100% biodiversity net-gain. This is a flawed metric which allows destruction under the guise of environmental improvement. Simply planting a few new flower species that were not previously present on site is treated as a net gain, regardless of the ecological damage done
- There should be a detailed plan showing how biodiversity net-gain will be achieved in this already ecologically sensitive area at this stage
- The site involves the loss of high-grade agricultural land which should be protected for self-sufficiency and food security (Boreham Conservation Society PSQ25-5259)
- An Agricultural Land Classification Report demonstrates that approximately two-thirds of the site comprises Grade 3a land; one third Grade 3b. No Grade 1 or Grade 2 agricultural land. Given that some loss of agricultural land is inevitable to meet development needs, that the land around Chelmsford is generally either Grade 2 or Grade 3, and the other sustainability benefits of allocation of 16b, the benefits of site's development would substantially

outweigh the harm engendered by the loss of this agricultural land (Pigeon (Sandon) Ltd PS25-238)

- Development will result in the irreversible loss of agricultural land, 17ha of which is considered to be 'the best and most versatile land' (Grade 3a), and which is currently in active use for food production (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6182, PSQ25-6179, PSQ25-6181, PSQ25-6188)
- The Local Plan does not take in to account the exceptional wildlife, in the Hammonds Farm area, in addition to the farmland it is bordered by the Essex Wildlife Trust, owned and managed Water Hall Meadows and Chelmer Valley Conservation Area. Detailed local surveys of sites have not been carried out (Little Baddow Society PSQ25-3251)
- The site will affect the area's attractions for residents and visitors who come to enjoy the woodlands and miles of footpaths with views over the valley and along the Navigation towpath. The pressure on these areas (and on Danbury Lakes) from new development will become significant (Chelmer Valley Landscape Group PSQ25-5145)
- Alternative sites, such as further development at North East Chelmsford, have better transport links and less impact on the environment and biodiversity
- The proposal would be contrary to Policy DM8 as the proposals would harm the intrinsic character, appearance and beauty of the area. The site is a beautiful deeply rural area, with wide open fields, surrounded by waterways, a Conservation Valley, ancient woodlands and practically no buildings. Placing 3000+ houses and industrial buildings of considerable height would be contrary to Policy DM8

Heritage

- The Council's HIAs has appropriately assessed the potential impacts of development on the historic environment and identified a suitable range of mitigation measures to address them effectively. On this basis, we consider the site suitable for allocation and welcome the inclusion of heritage criteria derived from the Council's HIAs and consider the policy sound (Historic England PSQ25-5811)
- The site does not contain any designated heritage assets. There are however several nearby designated heritage and non-designated heritage assets. A Built Heritage Assessment for the site demonstrates that there are no heritage issues which cannot be appropriately mitigated (Pigeon (Sandon) Ltd PS25-238)
- Considerable harm to the significance of a number of heritage assets and their settings, including the Grade II listed Sandon Lodge, Grade II listed Bridge Farmhouse, Sandon Bridge (Non Designated Heritage Asset), Danbury Park (Grade II Registered Park and Gardens) and the Grade I listed St John the Baptist Church (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6183, PSQ25-6179, PSQ25-6181, PSQ25-6188)
- Potential harm to an area of high archaeological value, which requires further investigation to ensure the conservation and preservation of assets (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6183, PSQ25-6179, PSQ25-6181, PSQ25-6188)

- The area contains evidence of Roman occupation. Archaeological investigations have revealed significant Roman and Iron Age activity, including burial sites and artefacts
- Aerial photography reveals historical structures that may require preservation. Recent surveys indicate the presence of subsurface remains of historical buildings and earthworks. Development without detailed archaeological assessments risks permanent destruction of unrecorded heritage sites (Langford and Ulting Parish Council PSQ25-734)
- A full field archaeology report of the site has not been undertaken, yet the desk-based archaeology report for site 16b identifies “enhanced potential for prehistoric activity”. The site has a known history of Roman importance. There are also many examples of more recent heritage assets. Para 207 of the NPPF requires a full field evaluation to be undertaken
- Policy DM15 states that planning permission will only be granted for development affecting archaeological sites providing the sites and their settings are protected, enhanced and preserved. There is no archaeology field report or evidence of how such mitigation can be achieved on site

Flood Risk

- Employment development is classified as ‘less vulnerable’ development in the NPPF’s flood risk vulnerability classification; and, the employment proposed by the site policy (as the FRA which accompanies the planning application demonstrates) can be accommodated within the site using only land that is Flood Zone 1, and avoiding areas most at risk of surface water flooding (i.e. the element of the site around Sandon Brook) (Pigeon (Sandon) Ltd PS25-238)
- Significant level of flood risk, in relation to river and reservoir flooding. As a result, to proceed to allocation, the site must pass the flood risk sequential and exemption tests, and little evidence has been presented to explain how the harm will be mitigated. The Sequential and Exception Test process has been completed by the Council but does not appear to address the core requirements of the NPPF. The implications for the new community and the surrounding areas do not appear to have been properly considered, and alternative options have not been fully explored. Instead, the issue has essentially been put ‘on hold’, for consideration when the major development comes forward, and this is not a rational or justified strategic approach, and is contrary to the requirements of the NPPF (see submitted Flood Risk Statement) (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6187, PSQ25-6179, PSQ25-6181, PSQ25-6188)
- The development site abuts the Chelmer and Blackwater valley. Flood risk mapping shows that parts of the proposed site regularly flood, particularly after heavy rainfall. Without substantial flood defences, development will exacerbate runoff into vulnerable areas downstream
- Climate change is increasing the severity of flood events, yet the Plan does not account for this risk. Existing flood models used in the Plan fail to factor in increased climate-driven rainfall and surface water risks. Building in a flood-prone area increases risks to property, infrastructure, and emergency response capabilities

- Flooding has always been a problem and every Winter, including 2024/2025, this is increasing, inevitably with the impact of Climate Change the situation will worsen (Little Baddow Society PSQ25-3251, Boreham Conservation Society PSQ25-5259)
- Building on the site will alter water runoff patterns, increasing the risk of flooding in surrounding areas. Paving over permeable land will increase surface water runoff, overwhelming local drainage systems. The risk of downstream flooding in Boreham, Hatfield Peverel, Langford, Ulting and Maldon will rise significantly as a result of this development (Langford and Ulting Parish Council PSQ25-734, Boreham Conservation Society PSQ25-5259)
- The development will exacerbate flooding in the Chelmer valley, and it is not clear how sewage and waste-water from the development will be effectively dealt with. There is clearly a danger that increased flooding and waste-water discharge from a major housing development will adversely affect water quality and biodiversity in the Chelmer and its tributaries (Chelmer Valley Landscape Group PSQ25-5145)

Infrastructure

- Support the provision of pedestrian, cycleway connections within the site and the wider area, the provision of a coherent network of new and accessible open space, sport, leisure and recreation facilities within the site (Sport England PS25-90)
- The proposed link road to A12 Junction 19 will be elevated above the flood plain and its embankments will slow down discharge of surface water increasing the risks of flooding up stream, it will split any proposed development in two, and compromise the views to and from the Listed Boreham House, and its separately listed grounds (Boreham Conservation Society PSQ25-5259)

Other

- At the time of the adopted Plan the A12 was regarded as the eastern boundary of the Chelmsford's built-up area and would not be extended beyond that. Nothing has changed to consider this location for development now (Boreham Conservation Society PSQ25-5259)
- The site is fundamentally unsustainable, and it is detached from the main urban area by the A12. Creating safe and welcoming linkages across the A12 from this location will be physically challenging to achieve, given the extent of existing dual carriageway and slip roads in the vicinity of the site (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6179, PSQ25-6181, PSQ25-6188)
- Developing beyond the A12 boundary sets a precedent for further development in the future on areas of land which are sensitive landscapes
- Other land would be more suitable for such development and other reasonable alternatives have not been fully identified or assessed (Boreham Conservation Society PSQ25-5259)

- Other options, such as further development at Noth East Chelmsford, have not been properly considered. The Issues and Options consultation saw five options, all of which saw an additional 3,000 homes in North East Chelmsford. When the Council was ahead of the housing target numbers North East Chelmsford was dropped and Location 16 taken forward instead
- North Chelmsford is an already urbanised area, with little in terms of landscape and wildlife of any interest. Meanwhile in Little Baddow and Danbury we have a mix of rural, good quality farmland and woodlands that are managed and preserved by The National Trust and Essex Wildlife Trust. The Plan will destroy the attractiveness of the area and put unsustainable pressure on the wildlife in the area. It has not been properly justified why North East Chelmsford is not being included for further development instead of Location 16

Changes requested

- The policy cites “Flood risk assessment” as an infrastructure requirement, but it is worth noting that it is not infrastructure but is a mandatory supporting evidence base to a planning application, so the wording of the policy needs to be corrected and perhaps replaced with “Flood Risk Management infrastructure” (Environment Agency PSQ25-629)
- No need for a masterplan on this site as the site is in single ownership, there are no land assembly challenges, complex constraints or infrastructure requirements that cannot be readily addressed through the usual planning application process. A masterplan for this site will add unnecessary delay and cost to delivery (Pigeon (Sandon) Ltd PS25-238)
- The policy wording relating to the use classes on site should be amended to make it clear that any mix of the listed use classes is acceptable, and that not all listed are required (Pigeon (Sandon) Ltd PS25-238).

CCC Response
Legal compliance and Duty to Cooperate
The consultation followed the Councils adopted Statement of Community Involvement (SCI) and Local Development Scheme (LDS).
In accordance with the Council’s SCI, the consultation was fully accessible to all, with paper and electronic documentation being available to all, and in person drop in events for all to attend.
The ‘Pre-Submission (Regulation 19) Statement of representation procedure and statement on availability of proposed submission documents for inspection’ is fully transparent in what the consultation covered, where to view the documents, and how to make comments, as well as how to contact the Council if they required assistance. The statement covered the following to assist anyone in making their comments: • PART 1 – What is a Regulation 19 Consultation • PART 2 – Legal Compliance and Duty to Co-operate • PART 3 – Soundness • PART 4 – Where can I view the consultation documents? • PART 5 – How can I comment? • PART 6 – Appearing at Independent Examination

• PART 7 – What will happen with my representation? • PART 8 – Statement on availability of proposed submission documents for inspection • PART 9 – Other consultations
The consultation portal is only one means of submitting representations. Representations made by email or post are inputting into the consultation portal by the Council and carry the same weight as those submitted via the consultation portal.
Detailed, step-by-step guidance for using the consultation portal was published specifically to guide users on how to make comments on the events for this consultation.
The two Regulation 18 consultations were fully compliant with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), with all relevant bodies being correctly notified of the consultations. Full details of those consulted are set out in the following documents: • Issues and Options 'You Said We Did' Feedback Report (May 2024) • Preferred Options 'You Said We Did' Feedback Report (February 2025)
The Regulation 19 consultation was fully compliant with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), with all relevant bodies being correctly notified of the consultations. Full details of those consulted are set out in Appendix 1 to this report.
Natural England have been fully engaged throughout the Local Plan process resulting in a Statement of Common Ground being agreed with the Council in December 2024 (SOCG010 refers).
In accordance with the Duty to Co-operate (in place at the time), the Council have engaged with all neighbouring Local Authorities, including Maldon District Council, and identified any Strategic matters to be considered through the Local Plan process. An updated Duty to Co-operate Strategy was published in January 2022 (DTC003) with the most recent Duty to Co-operate Position Statement, November 2025 (DTC005) setting out the latest update on the activities undertaken by the Council in respect to the Duty to Co-operate on the Review of the adopted Local Plan. Statements of Common Ground have also been agreed with the neighbouring authorities of Castle Point, Epping Forest, Uttlesford, Brentwood, Tendring, Thurrock, Maldon, Rochford, Braintree District Council's, Basildon Borough Council, Southend on Sea and Colchester City Council.
Neighbouring Local Authorities who have an adjoining boundary with CCC were required to be consulted under the Duty to Co-operate (in place at the time). Neighbouring Parish/Town Councils were required to be consulted at each stage of the Local Plan, but not as part of the Duty to Co-operate. Maldon Town Council is a Parish/Town level Council which is located within Maldon District and therefore does not comprise a Duty to Co-operate body. As the Town Council does not have a boundary with CCC there is no requirement to directly consult Maldon Town Council. Maldon District Council, with Maldon Town Council within its administrative area, is a Duty to Co-operate body which the Council have fully engaged with, and an updated Statement of Common Ground has been agreed with the Council in 2026 (SOCG010 refers).

Collectively the Local Plan evidence supports the site allocation, and the site policy allows for appropriate mitigation and infrastructure to be secured where necessary, resulting in sustainable development, consistent with the NPPF.
A Minerals Recourse Assessment (MRA) has been carried out and considered by the Essex County Council, as the Minerals Planning Authority. They have acknowledged that the minerals within the site are not of volume, quality or spatial distribution which would make extraction commercially viable. However, a condition is attached to the planning permission to ensure the incidental extraction of minerals during the development of the site, to ensure that those minerals that can be, are recovered and put to beneficial use.
The minerals siltation in North East Chelmsford differs as that site has an extant planning permission for mineral extraction. The minerals must therefore be exacted before any other form of development can take place on the site. There is no minerals extraction permission for this proposed site.
Site allocations are strategic matters for the Local Plan, but where applicable the made Neighbourhood Plans include detailed design and other guidance which can influence future detailed development proposals and planning applications.
Reference to the Parish Council receiving a % off the CIL receipt removed as the uses on site are zero rated for CIL so there will be no CIL receipt for this site.
Amount and type of development
Description of Use Classes amended to reflect approved planning application and to clarify that the site can have any of the uses and is not required to have all of them on site.
Amount of floorspace updated to reflect additional floorspace in approved planning application.
Highways
There is no proposal to reduce the amount of car parking for this site. The site will need to comply with the same parking standards as any other site, as out in Policy DM27.
All Highways modelling to support the Local Plan has been carried out at a strategic level, considering all proposed growth in the adopted Local Plan, background growth to 2041, neighbouring authorities' growth, and all newly proposed development sites.
The Inspector who granted planning permission for this site, via an appeal, concluded that the evidence before them (which covered a wide range of information, including, but not limited to existing highway conditions, the detail of the proposals, the detail of required changes to the wider networks, the suitability, accuracy and reliability of modelling, including the appropriateness of the data, assumptions and forecasting within it, as well as agreement on the future effects of, and acceptability of the appeal scheme), together with the other written evidence, sets out the existing highway context, the proposal, the likely effects of the proposal including traffic volumes, the proposed access and highway works and their effects, as well as an overall agreed conclusion that the proposal is acceptable in all of these regards and the development will accord with local and national transport policies. In reaching their conclusion the Inspector noted that the proposal, the mitigation and the modelling which supports it properly takes into account future growth in network demand and usage, the adjacent Hammonds Farm development proposals and other relevant future planned growth.

Subject to the conditions imposed by the planning permission granted for this site, the Inspector concluded that the proposal is not considered to have a negative, unacceptable or otherwise harmful effect on the operation, capacity and safety of the A12 and the local road network.
Historic Environment
The Inspector who granted planning permission for this site, via an appeal, concluded that the overall worst-case scenario is that the proposal would give rise to a low to very-low level of less than substantial harm to the significance of these heritage assets through development within their setting, but the harm identified should be weighed against the public benefits of the proposal. A similar level of harm has been found to the significance of a non-designated heritage asset, and a balanced judgment is required having regard to the scale of that harm. Taking into account the substantial public benefits of the proposal set out above, the Inspector found that the public benefits of the proposal do clearly outweigh the level of less than substantial harm found. As such, policies in the NPPF that protect heritage assets did not provide a strong reason for refusing the development proposed on this site.
Landscape/environment/flood risk
Site infrastructure requirements and reasoned justification amended to include reference to the need for appropriate flood risk management measures and SuDS.
There is no need to make specific reference to the need for flood risk management infrastructure to include contributions to the CFRPP as this is covered in Strategic Policy S9 – Infrastructure requirements. The Plan should be read as a whole and this would be unnecessary duplication as the site policy directly refers to Policy S9 and S10.
The Inspector who granted planning permission for this site, via an appeal, concluded that the Flood Risk Assessment (FRA) for the site, its conclusions and the recommendations within it, subject to those recommendations, mitigations and compensatory arrangements being secured by condition were acceptable and would not lead to an increased flood risk elsewhere.
It is the role of the Council and not the SFRA to consider alternative sites. The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. This includes in relation to flood risk as set out in the Sequential and Exception Test update May 2026 (CC021).
The Strategic Flood Risk Assessment Level 2 (CC010) includes a climate change allowance.
The Detailed Water Cycle Study 2024 (CC003) shows that the site can be adequately served by Chelmsford Water Recycling Centre (WRC) in respect to wastewater collection and treatment.

Location 10 – South Woodham Ferrers

Strategic Growth Site Policy 10 – North of South Woodham Ferrers

Consultation point	Total number of responses
Strategic Growth Site Policy 10 – North of South Woodham Ferrers	12

Summary of Representations – main issues and requested changes:

- Support for additional wording relating to a strategy for responding to National Grid Electricity Transmission plc (NGET) overhead transmission lines (National Grid Electricity Transmission PSQ25-6236)
- Welcome reference to the masterplanning principle to provide or make financial contributions to new or enhanced sport, leisure and recreational facilities as justified by the Council's emerging evidence base, other plan polices and NPPF (Sport England PS25-91)
- Para 7.412 - welcome reference to the development being required to encourage healthy and active lifestyles in line with the Active Design guidance. Update the text to reflect that Public Health England no longer exists (Sport England PS25-91)
- Pleased to see that the requirement for a Habitats Regulations Assessment (HRA) but note that the requirement for HRA will be required for all residential applications within the Essex Coast RAMS and other proposed developments which may have a likely significant effect on international sites (Natural England PSQ25-6254)
- Support requirements for developments to demonstrate sufficient capacity for wastewater treatment and disposal to serve the site. As outlined in the Water Cycle Study Stage 2, the dry weather flow will be exceeded at the South Woodham Ferrers water recycling centre (WRC) based on the proposed growth and current headroom is very limited. However, the Anglian Water PR24 Business Plan identified a growth scheme at South Woodham Ferrers WRC for AMP8 to enable growth to come forward (Anglian Water Services Ltd PSQ25-6406)
- Para 7.405 – concerned that if 21/01961/OUT is not implemented and a new proposal comes forward, the site capacity will be considered on its individual merit making the housing target meaningless (South Woodham Ferrers Town Council PSQ25-923)
- Para 7.411 – there is no reasoning for removing the size requirement for the new school or information on the implications of this for the site (South Woodham Ferrers Town Council PSQ25-923)
- Para 7.421 – question how it can be ensured that the Essex RAMS contributions from the site are directly used to mitigate impacts on our local habitat sites (South Woodham Ferrers Town Council PSQ25-923)
- Delete the site. It has not delivered any homes in line with the trajectory in the adopted Local Plan (May 2020) and is demonstrably undeliverable. The site still does not have a signed s106 agreement or a formal decision notice,

around two years after the resolution to grant permission. Plan should allocate additional sites and/or ‘reserve’ sites to ensure the plan can handle changing circumstances (Croudace Homes PS25-359)

- Add an additional bullet under ‘Site infrastructure requirements’ in line with the ECC Developers’ Guide to read: Financial contributions to primary, secondary, early years education and childcare, including SEND education as required by the Local Education Authority (Essex County Council PS25-227)
- Support for the allocation and policy objectives overall but the policy should have generic requirements, rather than being ‘tied in’ to the development covered by the recent application with a resolution to grant planning permission (Ref: 21/01961/OUT) (Vistry Group PS25-132)
- It would be expedient to acknowledge that the assessment of infrastructure delivery will consider viability considerations (Vistry Group PSQ25-6499)
- Amendments proposed to individual site criteria to remove superlative language and ensure CIL compliant requirements:
    - Opening para of policy - amend to “promote” or “encourage” opportunities for active and sustainable travel as “maximise” means that this must take precedence over every other material consideration
    - Opening para of policy - amend to state that “Development proposals should generally accord with the Masterplan Framework approved by the Council in 2021, or any subsequently approved revised Masterplan”
    - Amount and type of development - amend to require “around” 1,220 new homes and “around 1,000 sqm of business floorspace” (in line with the resolution to grant permission)
    - Amount and type of development - show the housing quantum as a range of 1,200 to 1500 homes to maximise the site potential
    - Site masterplanning principles 9th bullet and Site infrastructure requirement 10th bullet point - an on-site car club facility is unreasonable and fails to meet the CIL Regulations
    - Site masterplanning principles 10th bullet and Site infrastructure requirement 2nd bullet – delete references to “as required by the Local Highways and Transportation Authority” as this is not the correct basis for determining CIL compliant mitigation
    - Site infrastructure requirement 8th bullet – it is unreasonable to place the onus for demonstrating sufficient capacity in the foul drainage network on individual developers at the application stage
    - Site infrastructure requirements 11th bullet - current wording does not provide any clarity or measure as to what is required for sport and leisure
    - Site infrastructure requirements 12th bullet - financial contributions to secondary education would only be required sufficient to mitigate any adverse impact on school places, and not “as required by the Education Authority”
    - Site infrastructure requirements 13th bullet - amend requirement for community facilities to refer to an on-site community building (or equivalent), as required under the recent application. Amend reference to refer to a proportionate healthcare commuted payment and delete "as required by". The recent application shows no evidence of the need for such matters (Vistry Group PS25-132).

CCC Response
Minor modification will be proposed to education policy requirements including the addition of primary, early years and childcare, and SEND provision to reflect ECC's updated requirements.
It is noted that 'Public Health England' has been replaced by 'UK Health Security Agency (UKHSA)' but the Sport England and Public Health England's Active Design guidance has not been updated to reflect this, so plan remains up to date.
Site policy reflects the planning applications with resolutions to grant planning permission. If these are not implemented and a new proposal comes forward, the site capacity will be considered on its individual merit. This will allow for an appropriate degree of flexibility in provision and may allow a higher density development to be brought forward where it conforms with other policies in the plan as a whole.
The site policy retains reference to the size of a potential new primary school under Site infrastructure requirements. This is consistent with the adopted Local Plan.
In line the approved Essex Coast RAMS, endorsed by Natural England, developer contributions are pooled and spent on mitigation measures across the project area. This will include mitigation measures for the Crouch and Roach Estuaries Special Protection Area, Ramsar site and Site of Special Scientific Interest which lie to the south of SWF.
The policy appropriately reflects the latest planning application status of the site and requirements of the resolutions to grant planning permissions. This includes the housing quantum.
Policy does not refer to the masterplan approved in 2021 and would enable a revised approved masterplan to be considered.
The policy appropriately requires opportunities for active and sustainable travel to be maximised in line with national policy and other policies and objectives of the plan including Strategic Policy S16. The plan seeks to reduce reliance and not to replace private vehicles.
The policy appropriately requires developments to demonstrate sufficient capacity for wastewater treatment and disposal to serve the site as supported by the plan evidence base and Anglian Water Services Ltd.
Specific requirements with regards to sport and leisure are addressed through the masterplan/planning application stages.
Policy requirements for community facilities are retained to inform any new proposals that may come forward for development.
Policy requirements for education and highways accord with the requirements of the Education Authority.
It is the Council's view that requiring a car club on this site is justified. Providing car clubs on strategic housing sites such as this will help the council achieve its Strategic Priority 2 – Promoting smart, active travel and sustainable transport. It can provide a viable alternative to car ownership and can also reduce the amount of land required to be provided for car parking. Note also that the provision of a car club did form part of the committee report for the planning application for this site.

Location 11 – Bicknacre

Growth Site Policy 11b – Land at Kingsgate, Bicknacre

Consultation point	Total number of responses
Growth Site Policy 11b – Land at Kingsgate, Bicknacre	49

Summary of Representations – main issues and requested changes:

- We welcome the policy requirement to assess, and where appropriate mitigate, the potential cumulative effect on the designated features of Thrift Wood SSSI (Natural England PSQ25-6255)
- We welcome the inclusion of heritage criteria in the policy. The site is near Bicknacre Priory Scheduled Monument. Having reviewed the HIA, we are satisfied that the Council has appropriately assessed the potential impacts of development on the historic environment and identified a suitable range of mitigation measures to address them effectively (Historic England PSQ25-5812)
- Site falls within the Eastern 2 Wide Area Multilateration Network statutory safeguarding zone meaning any development of, or exceeding, 91.4m in height above ground level will trigger a statutory consultation requirement (Defence Infrastructure Organisation (DIO) PSQ25-6410)
- Support allocation but capacity studies suggest 25-35 dwellings is achievable on the 1 Ha site – site policy should be amended accordingly (Kingsbury PS25-180)
- For clarity, amend para 7.433 to state: 'Land to the west of the site is allocated for future 'recreation use' SUDs/biodiversity to serve the site, as shown on the Policies Map.' (Kingsbury PS25-180)
- Object to the allocation. Bicknacre has already satisfied its requirement for further housing since the adoption of the existing Local Plan (2020) and we are discussions to find an affordable housing site. Any further housing need could be accommodated at Hammonds Farm or elsewhere. Concerns about flooding, drainage capacity and loss of Grade 3 agricultural land. Additional homes built on Growth Site 11 in the Adopted Local Plan should be deducted from the overall requirement in Bicknacre (Woodham Ferrers and Bicknacre Parish Council PSQ25-1439)
- To meet the increased housing requirement, additional growth should be considered in Bicknacre (Gladman Developments Ltd PSQ25-6322)
- Insufficient infrastructure to support the development, including lack of public transport, police and fire services, the condition of roads and capacity at doctors' surgery and the school
- Will place further strain on existing facilities and utilities
- Increase in traffic, congestion and on street parking and the degradation of the condition of existing roads – concerns on pedestrian and road safety and quality of life
- Bicknacre has already had too much housing and there is sufficient housing to meet local need
- Impact on settlement character, loss of village status, environment, settlement boundary and the community

- Concerns on flooding, including Sandon Brook overflowing
- Drainage issues/lack of capacity and sewerage concerns
- Loss of agricultural land, heritage and culture
- Adverse impact on community spirit
- Impact on wildlife and their habitats/corridors and lack of environmental surveys e.g. bats and newts
- Noise and air pollution impacts – Chelmsford's Air Quality Strategy June 2022 is out of date and air pollution is likely to increase
- Concerns on pedestrian safety, including children and the vulnerable and the lack of/suitable existing footways within the village
- The IIA says 21SHELAA94 would result in back land development and performs less well to the preferred sites when compared to the Spatial Strategy
- Impact on adjacent bridleway
- Concerns on antisocial behaviour
- Traffic, congestion, noise, light and road safety concerns during the construction phase of the development
- Mental wellbeing impacts
- Contravenes the European Convention of Human Rights Article 8 - right to respect for your family and private life
- Past planning proposals state that the land will be retained for agricultural or grazing
- Site is within the Danbury Ridge Conservation Zone which is an area of special scientific interest the Council is committed to protect
- Focus development instead in under-used urban areas
- Loss of privacy and amenity
- Will be overdevelopment
- The Protection of Garden Land (Development Council) Bill is intended to 'protect private gardens from development which is out of character with the surrounding area'
- MP and Parish Council both oppose the development.

CCC response
Minor modification will be proposed to para 7.433 to confirm that land to the west of the site is allocated for future 'recreation use' and/or SuDS and/or biodiversity to accord with the Policies Map.
The site allocation is supported by the plan evidence base including a Strategic Flood Risk Assessment, Landscape Sensitivity and Capacity Study 2024 and traffic modelling. The Small Sites Planning Briefs/Concept Framework 2024 (appended to the Submission Spatial Strategy and Strategic Site Topic Paper) considers that there are no overriding site constraints which mean that the site is unsuitable or undeliverable.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
To meet our development needs it is inevitable that some agricultural land will be used for development.
Site policy includes new requirements to undertake an archaeological assessment and to assess, and where appropriate mitigate, the potential cumulative effect on the designated features of Thrift Wood SSSI.

The ‘small sites’ (under 1ha) are an important part of the Plan to ensure delivery of a variety of sites in a timely manner, and to meet NPPF requirements to provide 10% of small sites.
The Heritage Impact Assessment for the site was published alongside the Preferred Options Local Plan. Site policies consider significance of designated and non-designated heritage assets.
The site policy requires financial contributions to services and facilities including education and healthcare provision, and to provide appropriate improvements, as necessary to the local and strategic road network.
The Local Plan is informed by an Air Quality Assessment 2024 which overall concludes that the impact of the Local Plan in 2041 can be considered negligible for all pollutants.
Potential impacts on residential amenity. Including issues of overlooking and building noise would be addressed through the planning application process.
Objections relating to the breach of Article 8 protections are not supported with evidence to demonstrate a disproportionate or exceptional interference with private or family life that would warrant overriding the public interest in a site allocation for housing. Concerns raised relate to planning matters, which can and should be addressed through the planning application process.
The Danbury Ridge Conservation Zone is no longer a planning designation/policy.
The Protection of Garden Land (Development Council) Bill had a First Reading in Parliament in February 2009 but was then dropped by its sponsor.
Minor modifications will be proposed to ensure the development is designed in such a way that there is no impact on the operational or capability of nearby defence assets.

Growth Site Policy 11c – Land West of Barbrook Way, Bicknacre

Consultation point	**Total number of responses**
Growth Site Policy 11c – Land West of Barbrook Way, Bicknacre	126

Summary of Representations – main issues and requested changes:

- We welcome the policy requirement to assess, and where appropriate mitigate, the potential cumulative effect on the designated features of Thrift Wood SSSI (Natural England PSQ25-6256)
- Support allocation and policy, but the wider SHELAA submission site can accommodate a higher amount of growth which has not been assessed as a reasonable alternative in the IIA or wider plan evidence base. This would support the vitality of existing services and facilities (Welbeck Strategic Land V Limited PSQ25-3091)
- Object to the allocation. Additional homes built on Growth Site 11 in the Adopted Local Plan should be deducted from the overall requirement in Bicknacre. Further housing in Bicknacre has already been satisfied since the adoption of the existing Local Plan (2020) and we are in discussions to find an affordable housing site. Any further housing need could be accommodated at Hammonds Farm or

elsewhere. Concern on flooding, drainage capacity and loss of Grade 3 agricultural land. There is a ransom strip between Barbrook Way and the site making it undeliverable. The site will have an amber designation in the updated SHELAA meaning it is undeliverable and undevelopable so should be deleted (Woodham Ferrers and Bicknacre Parish Council PSQ25-1441)

- Insufficient infrastructure to support the development, including lack of public transport, police and fire services, the condition of roads and capacity at doctors' surgery and the school
- Will place further strain on existing facilities and utilities
- Will seriously devalue nearby houses
- Site has restrictive covenants on two strips of land – one restriction lasting until 8 June 2041 that no disposition of the registered estate can occur without signed certificates by the three previous owners
- Bicknacre has met its housing requirement with circa. 77 new homes being built/under construction and further affordable housing may be delivered – the village does not need more housing to meet local needs
- Increase in traffic, congestion and on street parking and the degradation of the condition of existing roads – concerns on pedestrian and road safety and quality of life
- Barbrook Way is an unsuitable entrance for any future developments
- Impact on settlement character, loss of village status, environment, settlement boundary and the community
- Concerns on flooding, including Sandon Brook overflowing
- Drainage issues/lack of capacity and sewerage concerns
- Loss of Grade 3 agricultural land – the site has always been used for animal grazing
- Loss of heritage and culture
- Adverse impact on landscape
- Impact on wildlife and their habitats/corridors and lack of environmental surveys e.g. bats and newts
- Disagree with the site's rating (CFS158) in the Strategic Housing and SHELAA – it has been incorrectly scored and should be lower
- The IIA says CFS158 would result in back land development and performs less well to the preferred sites when compared to the Spatial Strategy
- Adverse impact on community spirit
- Impact on neighbour amenity, privacy and loss of views from properties
- Impact on adjacent bridleway
- Contrary to Policy DM8
- Insufficient demand for homes – recently built new homes remain unsold
- Developers are promoting the site for potentially 250 dwellings contrary to the plan
- Concerns about antisocial behaviour and increased crime
- Traffic, congestion, noise, light and road safety concerns during the construction phase of the development
- Junction/road safety concerns, including the location of the drop off point of Sandon School bus at Barbrook Way/Priory Road
- Noise and air pollution impacts – Chelmsford's Air Quality Strategy June 2022 is out of date and air pollution is likely to increase

- Concerns on pedestrian safety, including children and the vulnerable and the lack of/suitable existing footways within the village
- There is a ransom strip at the entrance at the site – the site is not deliverable
- Land contributes to community wellbeing
- There is a water main running through the site – homes cannot be built on this or within its easements
- There is cable running under the access in contract with UK Power
- Concerns for protected trees within and near the site
- Concerns over heritage impacts
- Traffic, congestion, noise, light and road safety concerns during the construction phase of the development
- The alternative sites access would require a long road from the north across two fields, which would not be viable
- Appropriate and sustainable travel connections as stated in para 7.437 would not be achievable due to poor access
- Land has always been a major part of the local drainage system
- Contravenes the European Convention of Human Rights Article 8 - right to respect for your family and private life
- Would be overdevelopment
- Concerns over subsidence impacts on existing dwellings
- Archaeological assessments have not been done
- Select alternative sites available with less impact e.g. in North Chelmsford
- Would affect mental wellbeing and quality of life of existing residents
- Past planning proposals state that the land will be retained for agricultural or grazing
- The site is within the Danbury Ridge Conservation Zone which is an area of special scientific interest the Council is committed to protect
- The Protection of Garden Land (Development Council) Bill is intended to 'protect private gardens from development which is out of character with the surrounding area'
- MP, City Councillor and the Parish Council all oppose the development
- Should consider the developers' alternative entrances or field forming CFS158
- Unclear why less growth is promoted at North Chelmsford compared with the Issues and Options consultation document
- Concerns over car parking on nearby roads
- Concerns over consultation process and lack of awareness locally - portal is not user friendly and creates significant barriers to public participation
- No response received to the SHELAA rating question to Chelmsford Policy Board on 16 January 2025.

CCC response
The site allocation is supported by the plan evidence base including a Strategic Flood Risk Assessment, Landscape Sensitivity, Archaeology Assessment and Capacity Study 2024 and traffic modelling. The Small Sites Planning Briefs/Concept Framework 2024 (appended to the Submission Spatial Strategy and Strategic Sites Topic Paper) considers that there are no overriding site constraints which mean that the site is unsuitable or undeliverable.

The Local Plan is informed by an Air Quality Assessment 2024 which overall concludes that the impact of the Local Plan in 2041 can be considered negligible for all pollutants.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
The site is proposed for expansion in the Focused Consultation Additional Sites Document to support increased housing requirements.
The Council is confident that the site can be accessed from Barbrook Way and that the site is deliverable – see Appendix 3 for a letter from the site promoters' Welbeck Land.
To meet our development needs it is inevitable that some agricultural land will be used for development.
Site policy includes new requirements to undertake an archaeological assessment and to assess, and where appropriate mitigate, the potential cumulative effect on the designated features of Thrift Wood SSSI.
Heritage Impact Assessments have been undertaken and were published alongside the Preferred Options Local Plan. Site policies consider significance of designated and non-designated heritage assets.
The site policy requires financial contributions to services and facilities including education and healthcare provision, and to provide appropriate improvements, as necessary to the local and strategic road network.
The site policy requires the retention of existing natural landscaping and trees on the boundary of the site.
Objections relating to the breach of Article 8 protections are not supported with evidence to demonstrate a disproportionate or exceptional interference with private or family life that would warrant overriding the public interest in a site allocation for housing. Concerns raised relate to planning matters, which can and should be addressed through the planning application process.
The Danbury Ridge Conservation Zone is no longer a planning designation/policy.
The Protection of Garden Land (Development Council) Bill had a First Reading in Parliament in February 2009 but was then dropped by its sponsor.
The site (CFS158) scores and rating in the Strategic Housing and Employment Land Availability Assessment (SHELAA) will be re-considered in the next assessment due to be considered prior to submission of the Regulation 19 Local Plan. The SHELAA does not allocate land for development – it is one evidence document that helps the Council make informed decisions on where to allocate future development.
The IIA Report assessed the option across a range of criteria, including accessibility and connectivity to services.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process. Further expansion of North East Chelmsford (Chelmsford Garden Community - Location 6) was discounted following the Issues and Options consultation as promoted development sites were found to not be deliverable within the plan period given permitted mineral extraction and land remediation works.
The consultation exceeded requirements set out in legislation and the Council's Statement of Community Involvement.

Location 12 – St Giles, Bicknacre

Growth Site Policy 12 – St Giles, Moor Hall Lane, Bicknacre

Consultation point	Total number of responses
Growth Site Policy 12 – St Giles, Moor Hall Lane, Bicknacre	2

Summary of Representations – main issues and requested changes:

- Support the allocation (Woodham Ferrers & Bicknacre Parish Council PSQ25-6491)
- We welcome the policy requirement to assess, and where appropriate mitigate, the potential cumulative effect on the designated features of Thrift Wood SSSI (Natural England PSQ25-6257).

CCC Response
No comments.

Location 13 – Danbury

Strategic Growth Site Policy 13 – Danbury

Consultation point	Total number of responses
Strategic Growth Site Policy 13 – Danbury	6

Summary of Representations – main issues and requested changes:

- Welcome the policy requirements to conserve and enhance SSSIs and the expected partnership working with managers of the SSSIs and other key stakeholders (Natural England PSQ25-6258)
- Ministry of Defence (MOD) Safeguarding criteria would apply in relation to renewables development such as power lines or wind generation at specified heights on sites within this policy (Defence Infrastructure Organisation PSQ25-6411)
- Impacts on the SSSIs and Ancient Woodlands should be assessed at the Local Plan stage and scale, rather than for individual planning applications, so that cumulative impacts and mitigation can be adequately assessed (National Trust PS25-172)
- Suggest policy text amendment relating to site infrastructure requirements to include financial contributions towards other community facilities including healthcare provision as required by the NHS Mid and South Essex Integrated Care Board and police, ambulance and fire and rescue facilities (East of England Ambulance Service NHS Trust PSQ25-5247)

- An additional housing allocation could be made within Danbury to supplement the allocations made within the neighbourhood plan without significantly conflicting with the proposals of that plan (Gladman Developments Ltd PSQ25-6321)
- The policy should be amended to include the allocation of land to the south of Maldon Road, Danbury for a further 185 dwellings to ensure an adequate housing land supply is available (Richborough PS25-314).

CCC Response
MOD safeguarding criteria are noted.
Impacts on SSSIs and Ancient woodlands are addressed by the Integrated Impact Assessment through Objective 1, and Section 7 in particular; and within the Danbury Neighbourhood Plan at Policy DNP9 - Recreational Pressure on Sites of Special Scientific Interest.
The site allocation policies within the Danbury Neighbourhood Plan include financial contributions towards other community facilities, with remaining requirements covered by Strategic Policy S9 and S10 relating to infrastructure.
The Parish Council has selected the sites through a community-led approach, which is considered to be reasonable in relation to significant local constraints, and which resulted in the selection of the five chosen sites.

Location 17 – East Hanningfield

Growth Site Policy 17a – Land North of Abbey Fields, East Hanningfield

Consultation point	**Total number of responses**
Growth Site Policy 17a – Land North of Abbey Fields, East Hanningfield	8

Summary of Representations – main issues and requested changes:

- Support the allocation and policy requirements, but a higher quantum of development than 11 dwellings may be possible. The delivery of site could be within two years of the plan adoption (Chelmsford Diocese Board of Finance PSQ25-716)
- The developments are not wholly within the defined settlement
- Impact on local roads and surrounding areas – the village is already an extremely busy ‘rat run’
- Despite what is set out in the plan, recent local developments have resulted in very few truly affordable homes
- Impact on landscape
- Loss of good quality agricultural land
- Loss of biodiversity and habitat
- Surface waterflood risks as experienced by existing residents and as set out in the SFRA Level 2 Detailed Site Summary Table (CC010-A) which also rates the site as ‘Amber’ for flood risk
- Provision for the maintenance of the proposed SuDS must be provided

- Site capacity will be 0.8ha as part is at risk of deep surface water flooding – 11 dwelling will be too high and out of keeping with the existing development
- Inadequate sewerage capacity – this was why previous development was refused
- There is inadequate drainage in the village
- Site is unsuitable for development as it is identified as a Flood Priority Catchment in Anglian Water's Drainage Plan and Wastewater Management Plan (DWMP)
- Lack of integral garages/substantial driveways/ limited parking to comply with Essex Guidelines for Developers will increase roadside parking and be out of keeping with the local area
- Access to the site from Abbey Fields is too narrow to allow a full width road with pavements to provide a safe and adequate access for vehicles, pedestrians and cyclists, and additional land to widen the site entrance is not available
- Housing density will be 80% greater than the current homes contrary to the site policy design and layout requirements
- Impact on/lack of local services including inadequate school capacity and public transport
- Increase/exacerbation of traffic, congestion and on street parking in Abbey Fields and junction/road safety concerns
- Loss of wildlife habitat/impact on biodiversity, trees (including preserved trees) and landscaping
- Noise and pollution impacts
- The consultation process was inadequate, lacking sufficient community engagement and accessibility
- There was no community consultation on this proposal prior to its publication.

CCC response to the comments made
The site allocation is supported by the plan evidence base including Strategic Flood Risk Assessments, Sequential and Exception Test, Water Cycle Studies, Landscape Sensitivity and Capacity Study, Air Quality Assessment and traffic modelling. The Small Sites Planning Briefs/Concept Framework 2024 (appended to the Submission Spatial Strategy and Strategic Sites Topic Paper) considers that there are no overriding site constraints which mean that the site is unsuitable or undeliverable. The site allocation is considered sustainable and consistent with the plan priorities and other policies including the Spatial Strategy
The risk from surface water is identified in the Level 2 Strategic Flood Risk Assessment together with recommendations for making the site safe.
No objection has been received from Anglian Water for the development.
The entirety of Chelmsford city is within the 'Flood Priority Catchment', which goes as far as East Hanningfield. Developers should consult Anglian Water as part of any development proposal to ensure development does not exacerbate existing issues and maximise opportunities for development to deliver benefits in line with the long-term strategic aims set out in Anglian Water's DWMP.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.

The ‘small sites’ (under 1ha) are an important part of the Plan to ensure delivery of a variety of sites in a timely manner, and to meet NPPF requirements to provide 10% of small sites.
The site policy requires financial contributions to services and facilities including education and healthcare provision, and to provide appropriate improvements, as necessary to the local and strategic road network.
The site policy requires the character, scale and layout of the development to have regard and respond to the site’s surrounding context.
The site policy requires the retention of existing natural landscaping and trees in and on the boundary of the site.
The consultation exceeded requirements set out in legislation and the Council’s Statement of Community Involvement.

Growth Site Policy 17b – Land East of Highfields Mead, East Hanningfield

Consultation point	**Total number of responses**
Growth Site Policy 17b – Land East of Highfields Mead, East Hanningfield	5

Summary of Representations – main issues and requested changes:

- Support commitment to the allocation not exceeding 1 hectare in size
- Support the proposed area for biodiversity
- The developments are not wholly within the defined settlement
- Despite what is set out in the plan, recent local developments have resulted in very few truly affordable homes
- Development would be contrary to the plan’s Strategic Priorities and many Strategic Policies
- East Hanningfield is an inappropriate site for further development which would put additional strain on village facilities
- Loss of good quality agricultural land
- Impact on landscape
- Limited existing infrastructure to support the development, including public transport and capacity at doctors’ surgery and school
- Development should be required to improvement facilities for children/young people and public transport/bus services and cycle links to other settlements
- Loss of wildlife habitat/impact on biodiversity, landscaping and trees (including protected trees and great crested newts
- Proposal contradicts the council's duty to conserve biodiversity under the NPPF) and the local Biodiversity Action Plan
- Increase in traffic, congestion and on street parking
- Development must include a new pavement along Bicknacre Road and crossing point improvements, traffic calming measures and extensions of the 30mph speed limit
- Concerns on safety of pedestrians and cyclists
- Concerns on flooding
- Inadequate drainage infrastructure and sewerage

- Impact on settlement character
- Impact on neighbour amenity including a loss of privacy
- The consultation process was inadequate, lacking sufficient community engagement and accessibility
- There was no community consultation on this proposal prior to its publication.

CCC response to the comments made
The site allocation is supported by the plan evidence base including Strategic Flood Risk Assessments, Sequential and Exception Test, Water Cycle Studies, Landscape Sensitivity and Capacity Study, Air Quality Assessment and traffic modelling. The Small Sites Planning Briefs/Concept Framework 2024 (appended to the Submission Spatial Strategy and Strategic Sites Topic Paper) considers that there are no overriding site constraints which mean that the site is unsuitable or undeliverable. The site allocation is considered a sustainable and deliverable locations for development and consistent with the plan priorities and other policies including the Spatial Strategy.
No objection has been received from Anglian Water for the development.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
The 'small sites' (under 1ha) are an important part of the Plan to ensure delivery of a variety of sites in a timely manner, and to meet NPPF requirements to provide 10% of small sites.
The site policy requires financial contributions to services and facilities including education and healthcare provision, and to provide appropriate improvements, as necessary to the local and strategic road network.
The site policy requires the character, scale and layout of the development to have regard and respond to the site's surrounding context.
The site policy requires the retention of existing natural landscaping and trees in and on the boundary of the site. Other plan policies seek to conserve and enhance priority habitats and species and that new developments provide a minimum 10% biodiversity net gain above the existing ecological baseline value of the site.
The consultation exceeded requirements set out in legislation and the Council's Statement of Community Involvement.

Special Policy Areas (SPA)

Consultation point	Total number of responses
Special Policy Areas (paragraphs 7.464-7.465)	4
Policy SPA1 – Broomfield Hospital Special Policy Area	0
Policy SPA2 – Chelmsford City Racecourse Special Policy Area	0
Policy SPA3 – Hanningfield Reservoir Special Policy Area	2

Policy SPA4 – RHS Hyde Hall Gardens Special Policy Area	0
Policy SPA5 – Sandford Mill Special Policy Area	4
Policy SPA6 – ARU Writtle Special Policy Area	3

Summary of Representations – main issues and requested changes:

- Several SPAs are identified for expansion or alterations to road infrastructure. There should be engagement with the Road Policing Team to ensure access for emergency vehicles during the construction and final build stages (Essex Police PSQ25-2667)
- Support SPA rationale. Designate the former BAE Systems site as a SPA to guide its future redevelopment given its unique and historical context and potential need to provide future specialist electronic technology floorspace related to defence. It meets similar criteria to other SPAs within the Green Belt and satisfies the NPPF definition of 'Grey Belt' (Rosehart Properties Ltd PSQ25-3199)
- Propose that the Cranham Road site be allocated as a rural employment area, an extension to Drakes Lane Employment Policy or a Special Policy Area. The site has extant planning permission for employment development and will contribute towards the local economy. The site meets the SPA objectives in para 7.463 and a SPA allocation would provide a clear basis for determining future applications (W & H Marriage & Sons Limited PSQ25-6062)
- SPA3 - support policy approach but expand to include proposals for renewable energy which would reduce reliance on the grid and contribute towards achieving climate change goals (Essex & Suffolk Water PSQ25-5837)
- Remove requirement to show a demonstrable need for a renewable energy scheme as the treatment works is a regulated industry (Essex & Suffolk Water PSQ25-5837)
- SPA3 - delete requirement for very special circumstances for water infrastructure and ancillary development to demonstrable need and be directly associated with the role, function and operation of the operation of the site. The policy should recognise that the treatment works is only a part of the water infrastructure at the site and there is other infrastructure which may need to be upgraded or replaced (Essex & Suffolk Water PSQ25-5837)
- SPA3 - include new text to support, in principle, appropriate proposals including additional infrastructure requirements linking the site to the wider water infrastructure network, renewable energy and leisure activities to enable proposals benefiting ecological and health considerations to come forward (Essex & Suffolk Water PSQ25-5837)
- SPA3 - we would be pleased to comment early in the application process on the details of avoidance and mitigation measures deemed necessary for proposed developments that may impact on Hanningfield Reservoir SSSI, particularly through recreational disturbance and effects on water quality (Natural England PSQ25-6259)

- SPA5 - support but point out that the new vehicular access to Maldon Road which is considered essential for servicing is no longer supported by SGS3a (Essex Waterways Ltd PSQ25-5219)
- SPA5 - amend policy to be consistent with SGS3a which requires a new vehicular access road to the Country Park with a new pedestrian and cycle bridge connecting the Country Park to Sandford Mill (Hopkins Homes Ltd PS25-261)
- SPA5 para 7.476 - supports the aims for an appropriate mixed use development linked to the Chelmer and Blackwater Navigation. More emphasis should be placed on the re-use and restoration of existing buildings (Chelmsford Rivers and Canal Link group PS25-282)
- Support. The facility is located within Writtle Key Service Settlement and is a leading institution and key driver for the local economy. As such, the plan should provide new housing allocations near the ARU campus (Vistry Group PS25-303)
- SPA6 - support sympathetic improvements to the ARU Writtle site in line with Green Belt policy. The Norwich to Tilbury powerline proposals will have a significant impact on ARU Writtle (Writtle Parish Council PSQ25-460)
- SPA6 - support principle of the SPA but object to any future expansion of ARU Writtle being dependent on the agreement (the meaning of which is not clear) of a masterplan for the campus. Amend wording to require any future planning applications to maintain National Cycle Route 1 which runs through the 'campus' rather than the 'site' as this places an unnecessary burden on ARU (Anglia Ruskin University PSQ25-6214)
- SPA6 - amend policy to require the replacement of existing buildings or structures to 'accord with national Green Belt policy' rather than 'not have a greater impact on the openness and purposes of the Green Belt' to avoid duplication of national policy (Anglia Ruskin University PSQ25-6214).

CCC response to the comments made
SPAs are defined within and around existing facilities and institutions to enable their operational and functional requirements to be planned in a strategic and phased manner. BAE Systems is already designated as an Employment Area in the Green Belt and most of the designated Employment Area is promoted for residential redevelopment. A SPA designation for this site would not be appropriate.
Land at Cranham Road is being developed for new headquarters for W & H Marriage & Sons Ltd. Other policies in the plan will enable any future proposals to be considered. A SPA designation for this site would not be appropriate.
The plan allocates a range of employment sites to meet the employment floorspace requirements in Policy S6 and to allow for a range of different employment uses to come forward, where appropriate – no further modifications required.
A range of alternative development sites have been considered and rejected when developing the Spatial Strategy. More information is set out in the Spatial Strategy and Strategic Sites Pre-Submission Topic Paper and Preferred Options Local Plan.
SPA3 - A SPA policy designation operated by a regulated industry does not override the requirement to show a demonstrable need for proposals in the Green

Belt. Other plan policies allow appropriate renewable energy proposals and infrastructure proposals for the site to be considered including DM19.
SPA5 – Minor modification will be proposed to update the text to reflect SGS3a and proposals for a new vehicular access road to the Country Park with a new pedestrian and cycle bridge connecting the Country Park to Sandford Mill.
SPA5 - The intention is for most visitors to Sandford Mill to park in the country park car park south of the Navigation and access the site via a foot/cycle bridge. Details of access for commercial vehicles is part of further discussion relating to a current planning application.
SPA6 – Minor modification will be proposed to require any future planning applications to maintain National Cycle Route 1 which runs through the Special Policy Area allocation.
SPA6 – references to proposals not having a greater impact on the openness and purposes of the Green Belt ensure that the policy is clear and precise for decision makers.

Protecting and Securing Important Assets

This section of the consultation document provides other non-strategic policies of the Local Plan that will shape Chelmsford's development opportunities whilst protecting its important physical attributes.

Securing the right types of homes

Consultation point	Total number of responses
Para 8.1	1
Policy DM1 – Size and Type of Housing	17
Policy DM2 – Affordable Housing and Exception Sites	9
Policy DM3 – Policy DM3 – Gypsy, Traveller and Travelling Showpeople Sites	4

Para 8.1

Summary of Representations – main issues and requested changes:

- An additional Development Management policy should be included to address farm diversification and rural business development to align with the NPPF (Elteam Ltd PSQ25-5465)

CCC response
The suite of Development Management Policies adequately cover rural businesses. Any further is not required as it would be unnecessary duplication of the NPPF.

Policy DM1 – Size and Type of Housing

Summary of Representations – main issues and requested changes:

- Support 35% affordable housing but provision should be made to enable residents to have priority for such accommodation, for disabled living homes and bungalows, and an appropriate housing mix for the entire community (Chelmsford Garden Community Council PSQ25-4957)
- Expand Part B (i) to require Passivhaus or BREEAM Excellent (East of England Ambulance Service NHS Trust PSQ25-5249)
- If the demand for self-build has been met through windfall delivery, the 5% requirement should be reduced or removed (Home Builders Federation PSQ25-5476). Policy should set out when self-build plots required through the policy would return to the developer for market housing if not sold (Home Builders Federation PSQ25-5476, Gladman Developments Ltd PSQ25-6324)
- Each type of accommodation will have changing requirements over the plan period and at the decision-making stage of development proposals it is essential that these can be achieved and do not impact the overall viability of the development (Higgins Group PSQ25-5628)
- Delete reference to a required number of dwellings and substitute the words ‘encourage’ and ‘engage’ to align with the PPG. Focusing solely on the local housing need requirement when determining how much self-build is appropriate is not consistent with other factors that affect delivery of self-build including viability. There is no evidence for the 30 and 100 dwelling thresholds. The reasoned justification does not explain why 100 dwellings is an appropriate policy threshold (Croudace Homes PSQ25-6049)
- Part D - although the residential strategic growth sites will need to provide specialist housing this will unlikely meet needs in full so additional allocations are needed (Mrs Mary Rance PSQ25-6497)
- Support requirement for 50% of new dwellings to be constructed to M4(2) standards. Part C requirement for self-build homes and specialist residential accommodation should apply to developments over 100 homes on strategic greenfield sites and is unachievable in high density urban locations and apartment typologies (Dominus Chelmsford Limited PSQ25-6206)
- Support expressed for policy and table 4 but it must remain flexible to change over the plan period e.g. in response to Building Regulations. Include table 4 in the policy if it will be used to determine the housing mix of new developments and amend to percentiles to allow for a mix which is reflective of the specific settlements. The text should refer to the latest SHNA (Dandara PSQ25-6298)
- A dedicated policy for older persons housing is required to meet evidenced significant demand – a suggested policy is proposed. Concerns over the robustness of the 2023 viability assessment which should be re-run using recommended assumptions for sheltered and extra-care housing. Disagree with the PGG in that the viability of specialist older people's housing is considered at the development management stage (Churchill Living and McCarthy Stone PSQ25-6330
- Support appropriate accommodation for older people justified by local housing need. Further clarification is required on the definition/scope of 'Older Persons accommodation’ and its application through the Planning Obligations Supplementary Planning Document. Amend Part D to require ‘up’ to 10% of

market housing to be provided for Older Persons, ‘taking account of local housing needs.’ (Chelmsford Garden Community Consortium PSQ25-6352, Vistry Group PSQ25-6379)

- Part C - amend "taking account of local need" to "taking into account evidence of local need provided either by the applicant or by the City Council and relevant partners" to ensure identifying need is not the sole prerogative of CCC (Vistry Group PS25-141)
- Part D – policy fails to define "Older Persons" and explain the overlap between the requirements for 5% M4(3) properties, for a proportion of affordable housing, and for an element of Specialist Residential Accommodation, and the 10% for "older persons". The policy ignores that 'older persons' may seek a house identical to a younger person’s house limiting the ability of housebuilders to provide market housing that meets demand. Remove Part D in the absence of any justification/explanation (Vistry Group PS25-141)
- Para 8.16 states the Council will refer to the latest assessments of housing need. This will also be informed by the Supported and Specialist Housing and Accommodation Needs Assessment’ commissioned by ECC Adult Social Care expected to be completed in Spring 2025. ECC will work with CCC to determine how the findings of the assessment can inform other documents, such as the Planning Obligations SPD and future planning application responses (Essex County Council PS25-234)
- Support policy but give stronger support to Build to Rent, to fully comply with national guidance on properly assessing the needs of those who want to rent and reflect the demand for rented homes and the benefits of delivery of this tenure. Expand para 8.6 to refer to the SHNA and where viable, the inclusion of Build to Rent as part of a wider housing mix (Wates Developments and Hammonds Estates LLP PS25-327)
- Support Part D in principle but this should be an aim rather than a fixed target and subject to local housing demand assessed at the time of the planning application. Expand Part D) (i) to require 10% "subject to an assessment of local housing demand" (Wates Developments and Hammonds Estates LLP PS25-327)
- Housing policies should reference the Co-Living Housing Advice Note or include allowances and flexibilities for co-living accommodation to come forward where it otherwise complies with the Advice Note. The Housing Topic Paper should also reference the Advice Note (Highgate Capital Limited PSQ25-5331)
- Allocate a co-living site in Chelmsford City Centre (Highgate Capital Limited PSQ25-5331)
- Unclear which viability assessment has considered the cumulative impact of the plan polices as there are differences in the inputs and outputs of each e.g. for DM31 and DM25. A list of differences and the reasons is required to show that the plan is deliverable. Some of the costs are too high e.g. the sales values of affordable rented housing and the value of S106 affordable homes. Other costs are too low e.g. delivering BNG and meeting policy DM31. Further viability work should be undertaken (Home Builders Federation PSQ25-5477).

CCC Response
The housing mix in Policy DM1 is informed by latest Strategic Housing Needs Assessment. The Council seeks nomination right to 100% of initial lets on new build dwellings to be offered to people on the Council's Housing Register. To join the Housing Register an application must have a location connection to Chelmsford.
BREEAM does not apply to newly built dwellings. The net zero evidence base established for Essex includes a Net Zero Carbon Viability Study by Three Dragons consultant which provided an assessment of building to higher energy efficiency standards similar to Passivhaus.
The demand for self and custom build has not been met in the latest monitoring period. For Base Period 6 the Council has recorded a deficit of 37 planning permissions.
If self-build plots required through Policy DM1 are not sold within a specific marketing period they can return to market housing. This is specified in the Planning Obligations Supplementary Documents, which is appropriate as it supplements the implementation of appropriate planning policies.
The latest Strategic Housing Needs Assessment considers the need for different types and sizes of accommodation over the plan period. The Local Plan is also subject to review at least every five years. Text relating to particular circumstances that justify the need for a viability assessment in Policy DM2 will be proposed to be moved to Strategic Policy S10 so it is clear this applies equally to all planning obligations.
The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) mandates that relevant local authorities keep a register of individuals and community groups who express interest in acquiring serviced plots of land for self-build and custom household projects. National Planning Practice Guidance states that local authorities must have regard to their Self and Custom Build Register when carrying out their planning, housing and disposal and regeneration functions. Relevant authorities must give suitable development permission to enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area. The level of demand is established by reference to the number of entries added to an authority's register during a base period. At the end of each base period, relevant authorities have 3 years in which to permission an equivalent number of plots of land, which are suitable for self-build and custom housebuilding, as there are entries for that base period. The Council has not been able to meet this demand in the last published Base Period (6). Self-build and custom housebuilding can be provided as market housing, and the 5% requirement was considered in the viability update of the emerging Local Plan which concluded that a requirement for self-build plots is unlikely to adversely impact on viability. The Reasoned Justification to Policy DM1 explains that the 5% requirement for self and custom build dwellings on larger housing schemes provides a supply from allocated sites that addresses the average rate of new applications to the register across the plan period. The Council cannot rely on windfall to meet the legal requirement to grant the required number of planning permissions in each base period. The requirement for wheelchair accessible housing was justified in the Examination of the adopted Local Plan (see EB056) and no changes are proposed. The thresholds for both Wheelchair Accessible Housing and Specialist Residential Accommodation are determined by the ability to secure one dwelling with the application of the respective requirements. Further

explanation on both is provided in the adopted and consultation draft Planning Obligations SPD and has been considered in the latest Local Plan Viability Update.
Table 4 is based on demographic analysis and the plan is reviewed every 5 years so does not need to be more flexible than a percentage range.
Policy DM1 already recognises the importance of a choice of attractive housing options for older households with the introduction of 10% of market housing to meet their needs on sites of more than 500 dwellings. This does not preclude windfall provision which has and will continue to come forward. This could include wheelchair user dwellings in the market sector if required / evidenced. The Council expects Building Regulations to mandate all new homes to be built to accessible and adaptable standards and has allowed for this in the Local Plan Viability update but does not need to introduce this as a policy change.
The 10% is related to different types of supported housing for older people in the latest Strategic Housing Needs Assessment but this also notes a need for 637 wheelchair user homes in the 2022-41 period (around 34 per annum). 'Up to' would not be at the appropriate level and could result in a zero contribution. This does not provide sufficient clarify. The requirement is flexibly worded to enable delivery that includes specialist market housing as well as wheelchair user housing.
Para 8.16 refers also to Essex County Council and other evidence base assessments referred to/recommended by National Planning Practice Guidance e.g. Gypsy and Traveller Accommodation Assessment, Strategic Housing Needs Assessment, so it is not currently drafted to be the sole prerogative of Chelmsford City Council.
The wheelchair accessible requirement of Policy DM1 is required to meet the needs on the Housing Register from wheelchair dependent applicants and was justified at the examination of the adopted Local Plan. Specialist Residential Accommodation is broadly defined but it does relate to households in housing need as set out in Policy DM1. It is therefore justifiable that the Specialist Residential Accommodation requirement relates to evidence on households in housing need requiring supported housing that are identified in the normal way i.e. through the Strategic Housing Needs Assessment, Housing Strategy and Essex County Council assessment of housing support needs. The Specialist Residential Accommodation requirement doesn't relate to demand for supported market housing for people that have a support need but not a housing need. These are largely older people that might benefit for market housing for older people that offers support and / or more accessible housing. The evidence is taken from the Strategic Housing Needs Assessment i.e. the 10% for supported housing in the market sector for older people. These households will be able to financially acquire supported housing in a way which households in housing need cannot.
The Co-living Planning Advice Note is referenced in the consultation draft Planning Obligations Supplementary Planning Document, which is considered the appropriate place as this deals with implementation of policies.
The Regulation 19 Viability Note summarises the changes that were appraised compared to the Regulation 18 assessment and concludes that the Council can continue to rely on the 2023 (Regulation 18) Viability Report.
There are a range of Specialist Residential Accommodation needs identified which can be met on a brownfield or greenfield typology alternatively the Specialist Residential Accommodation Planning Advice Note and/or Planning Obligations

Supplementary Planning Document provide an option for a commuted sum in lieu of on-site provision. The Planning Obligations Supplementary Planning Document also provides advice on flatted development and notes that where there is evidence of local demand for serviced plots but they are not possible e.g. flatted schemes, the Council will require the provision of 'complete shell' or 'self-finish' units where the purchaser can then define internal layouts, finished and fixings as well as any exterior landscaping for flats with private gardens.

Policy DM2 - Affordable Housing and Exception Sites

Summary of Representations – main issues and requested changes:

- Support expressed for policy (Croudace Homes PSQ25-6050, Dandara PSQ25-6299)
- To better align with the NPPF and enhance flexibility, amend parts B and D to allow a higher proportion of market housing where justified by a viability assessment (specific wording proposed) (Elteam Ltd PSQ25-5460)
- The viability profile of developments will change over the plan period and will need to be balanced alongside other policy requirements and costs such as biodiversity net gain (Higgins Group PSQ25-5629)
- A "one-sized fits all" policy discourages a brownfield first approach. Policy should include a reference to the Vacant Building Credit (Dominus Chelmsford Limited PSQ25-6207)
- Flawed assumptions underpin the Council's viability assessment and the evidence base for the conclusions on Build to Rent in para 8.3 are unsound (Dominus Chelmsford Limited PSQ25-6207)
- No guidance is provided on "comprehensive review mechanism" in part A which can be a disincentive to developers including bank finance (Dominus Chelmsford Limited PSQ25-6207)
- There are barriers to securing delivery of rural small-scale affordable housing schemes (see Braintree Issues and Options Consultation Document, 2025), so larger site allocations could be more favourable (Dandara PSQ25-6299)
- The housing requirement is unjustified as drafted, so the Viability Assessment must consider whether the plan is viable against the requirements of the NPPF 2024 (Gladman Developments Ltd PSQ25-6325)
- There is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings as well as providing specific provision of older persons housing. Higher M4(2) and M4(3) requirements are proposed whilst maintaining flexibility in the policy. Requiring 35% affordable housing from older persons housing development is not justified. Concerns over the robustness of the 2023 viability assessment which should be re-run using recommended assumptions for sheltered and extra-care housing (Churchill Living and McCarthy Stone PSQ25-6329)
- Amend policy to require 35% affordable housing 'subject to viability' so the policy would not undermine the delivery of the plan (Vistry Group PSQ25-6386)
- The increasing affordability ratio and gross historic under delivery of affordable housing justifies provision of a 20% supply buffer above the minimum housing figure. Plan should allocate more small-medium site

allocations which could deliver affordable homes quicker than bigger sites. (Richborough PS25-174)

CCC Response
Part B of Policy DM2 as drafted has enabled the delivery of several rural exception sites in Chelmsford. If market housing were allowed to exceed 50% the policy would conflict with paragraph 82 of the NPPF (2024) which says 'some'. The purpose is to deliver affordable housing to meet identified local needs and to have the majority as market housing would not achieve this national policy aim. Paragraph 76 of the NPPF (2024) grants local planning authorities' discretion to enable market homes on Community-led exception sites. To align the proportion with the policy wording for First Homes Exception Sites provides parity between the different options and doesn't indirectly promote one option over the other.
The First Homes Planning Practice Guidance (Paragraph: 027 Reference ID: 70-027-20210524) expressly states that they can deliver a small proportion of market housing, if it can be demonstrated that this is necessary in order to ensure the overall viability of the site. 20% is considered an appropriate interpretation of small. The overall site size reference isn't arbitrary it follows the same advice provided in the NPPF (2024) for Community-led development (footnote 36 / footnote 37 in the 2023 NPPF). Once again this provides parity between the two different types of exception site. The First Homes Planning Practice Guidance (Paragraph: 026 Reference ID: 70-026-20210524) encourages local authorities to set policies which specify their approach to determining the proportionality of First Homes exception site proposals and the sorts of evidence that they might need in order to properly assess this.
The policy requirements of the Local Plan have been assessed in the Local Plan viability update and a balance reached in terms of different priorities. They will be kept under review through the Infrastructure Delivery Plan and Policy DM2 recognises that there may be particular circumstances justify the need for a viability assessment at planning application stage. The Local Plan must also be reviewed every 5 years.
A one sized fits all policy doesn't discourage a brownfield first approach when the plan recognises that there may be particular circumstances justify the need for a viability assessment at planning application stage. The Vacant Build Credit and a calculation for it has long be referenced/included in the adopted Planning Obligations Supplementary Planning Document.
The Council does not expect to allocate sites specifically for Build to Rent development however a flatted scheme and a housing scheme were modelled. The results showed that that Build to Rent housing is likely to be viable and deliverable – and to have capacity to bear more than 20% affordable housing, but flatted development is unlikely to be. Planning Practice Guidance specifically anticipates that the viability of Build to Rent schemes will be considered at the development management stage. It is therefore not considered proportionate to develop a specific set of policies in this regard. As set out above, the Council does not expect to allocate sites specifically for Build to Rent development. In any event, such flatted development is unlikely to be viable, even without affordable housing. Consequently, the Council should be cautious about relying on Build to Rent schemes to deliver development, unless there is clear evidence that such development would be forthcoming.

Guidance on the review mechanism is provided in paragraphs 8.35 and 8.36 and the consultation draft Planning Obligations Supplementary Planning Document.
The Council is proposing to adopt the national threshold of 10 dwellings for affordable housing contributions to maximise delivery. The Local Plan viability update does not evidence a difficulty of securing affordable housing on these threshold sites especially in greenfield locations.
The removal of the requirement to provide First Homes improves viability as developers would be required to revert to shared ownership with the same 30% proportionate discount but a lower profit margin. The Council is still requiring 10.5% shared ownership so complies with the requirements of the 2023 NPPF. The Council considered whether to include a social rent target but decided to maintain a higher proportion of affordable housing overall. The 'new' Golden rules are subject to national policy guidance.
The delivery of specialist housing schemes was considered at the end of Chapter 10 of the 2023 Viability Update (from paragraph 10.66). The delivery of Sheltered Housing, Extracare Housing and Integrated Retirement schemes are all shown as being viable and generating a residual land value well in excess of the Benchmark Land Value.
The Council has tested viability of all the policies in the plan and across the majority of typologies this level of affordable housing in combination with other requirements is viable. Policy DM2 acknowledges that there might be circumstances where a viability assessment is required at planning application stage.
The Council is proposing to adopt the national threshold of 10 dwellings for affordable housing contributions to maximise delivery.

Policy DM3 – Gypsy, Traveller and Travelling Showpeople Sites

Summary of Representations – main issues and requested changes:

- Welcome reference to protecting the Green Belt (Writtle Parish Council PSQ25-461)
- In line with planning policy, any future provision should be outside this Parish as there is already existing substantial provision within this Parish (Chelmsford Garden Community Council PSQ25-4952)
- Requirement to meet all 10 criteria is unworkable. Some of the language needs to be tempered and/or clarified including for proposals to 'have no adverse impact'. Add "significantly" before "adverse impact" in criterion (ii) and (vi). Add "normally" before "considered appropriate within the Green Belt or Green Wedge" in para 8.50 to be consistent with national policy guidance (Mr D Bibby and Family and Colleagues PSQ25-6357, PSQ25-6358).

CCC Response
Gypsy and Traveller and Travelling Showpeople sites are allocated as small sites so that they do not dominate the nearest settled community, even if counted collectively across a community council area.
As drafted, Policy DM3 is reasonable. It creates a hierarchy of scope for windfall sites of very special circumstance in the Green Belt, no adverse impact in the Green Wedge, and no significant adverse impact in the Rural Area. It is

considered correct to distinguish between an adverse impact and an impact. An adverse impact can be mitigated by an appropriate layout and landscaping. It is considered reasonable to safeguard important heritage and natural environmental assets/environs. The addition of “normally” to paragraph 8.50 will be supported as a proposed minor modification and adds clarity.

Securing Economic Growth

Consultation point	**Total number of responses**
Policy DM4 – Employment Areas and Rural Employment Areas	2
Policy DM5 – Designated Centres	0

Policy DM4 – Employment Areas and Rural Employment Areas

Summary of Representations – main issues and requested changes:

- The employment and sustainability policies are potentially incongruous. A small-scale alteration to the Green Wedge/Green Belt boundary should be considered and an extension to the Employment Area allowed at Robjohns Road, Rodney Way in line with national policy (Saxtons 4x4 PSQ25-6109)
- Remove the Employment Area designation from the western part of the former Kay-Metzeler site (SGS1x in the Preferred Options Consultation Document) and allocate it for residential and commercial development. This could form part of ‘New Street to Anglia Ruskin University’ Opportunity Corridor (HEVF Self Storage UK Limited PSQ25-6338).

CCC response
The Green Wedge is a locally important designation. Changes to the Green Wedge boundaries to allow development growth has been discounted as there is sufficient and suitable land elsewhere to meet development needs in a sustainable way. No Green Wedge Review is required.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process; and can meet its development requirements without needing to undertake a Green Belt review. This approach accords with National Planning Guidance.
The Council will review its Five Year Housing Land Supply prior to Submission of the Local Plan and should further housing allocations / changes to the forecast delivery be required, these changes will be included as proposed minor modifications to the Plan.

Policy DM5 – Designated Centres

No main issues

Protecting the Countryside

Consultation point	Total number of responses
Policy DM6 – New Development in the Green Belt	8
Policy DM7 – New Buildings and Structures in the Green Wedge	7
Policy DM8 – New Buildings and Structures in the Rural Area	4
Policy DM9 – Infilling in the Green Belt, Green Wedge and Rural Area	2
Policy DM10 – Change of Use (Land and Buildings) and Engineering Operations	0
Policy DM11 – Extensions to Existing Buildings within the Green Belt, Green Wedge and Rural Area	0
Policy DM12 – Rural and Agricultural/Forestry Workers' Dwellings	0

Policy DM6 – New Development in the Green Belt

Summary of Representations – main issues and requested changes:

- Policy needs to follow the 2024 NPPF (J & T Wardrop and the Wardrop Trust) including in relation to previously developed land and affordable housing need (Hill Residential Ltd PS25-381)
- The policy replicates the 2023 NPPF. Update to reflect the 2024 NPPF to avoid uncertainty and ambiguity for decision makers - see the emerging West Suffolk Local Plan as an example (Chelmsford City Football Club PS25-215)
- Policy provides no detail on the level or scale of development acceptable within the Green Belt and limits infill opportunities (Higgins Group PSQ25-5630)
- Amend the Green Wedge/Belt to extend the western boundary of Robjohns/Widford Employment Area. This site has limited value in the openness of the Green Belt, is inconsistent with the Green Wedge criteria and conflicts with Policy DM4. The employment extension could support growth in this sustainable location, with existing transport and pedestrian links (Saxtons 4x4 PSQ25-6110).

CCC response
Development growth in the Green Belt has been discounted as there is sufficient and suitable land is available outside the Green Belt to meet the development needs in a sustainable way. A Green Belt Review is not required.
The Pre-Submission Local Plan will be examined under the 2023 NPPF so the plan policies have been written to accord with this national policy document. The 2023 NPPF does not refer to Grey Belt.
The Green Wedge is a locally important designation. Changes to the Green Wedge boundaries to allow development growth has been discounted as there is sufficient and suitable land elsewhere to meet development needs in a sustainable way. No Green Wedge Review is required, and the deletion of Green Wedge policies would be inappropriate.
The policy includes details on the type and size of new development that may be acceptable in the Green Belt and directs to other relevant policies in the plan. Para 5.1 of the plan says that its policies should be read a whole.

Policy DM7 – New Buildings and Structures in the Green Wedge

Summary of Representations – main issues and requested changes:

- Support the policy which clarifies that utility infrastructure including water recycling and treatment sites is appropriate within the Green Wedge (Anglian Water Services Ltd PSQ25-6393)
- Support in principle but it is too restrictive on development in the Green Wedge. Amend Para 8.87 to allow consideration of harm to the openness, role and / or function of landscapes on a case-by-case basis (Chelmsford City Football Club PS25-218)
- Para 8.92 – it is unclear what is meant by 'regional centre' type facilities and restricting development to 'local' community facilities in unjustified (Chelmsford City Football Club PS25-218)
- Policy is overly restrictive without a detailed assessment to ensure land within the Green Wedge performs its intended purposes. A more positive approach to sustainable development is needed to realise the Green Wedge objectives (Mr J Bolingbroke PSQ25-5521)
- Unclear why a residential development must meet Part A in addition to demonstrating that it would not conflict with the purposes of the Green Wedge (Mr J Bolingbroke PSQ25-5521)
- Questions the need for the policy as less restrictive planning policies can protect the open countryside. Undertake a Green Wedge Review to allow growth in sustainable locations which protect Green Wedge purposes including in Broomfield (Obsidian Strategic Asset Management Ltd PSQ25-5713)
- The Green Wedge seems to be afforded the same level of protection as Green Belt although it is a local spatial designation more steered towards landscape, environmental attributes and public accessibility rather than openness. Allocate sites/amend the designation for land which does not perform strongly against Green Wedge functions (The Bucknell Family PS25-293)

- Amend policy to support higher employment and housing growth, including addressing unmet housing needs of neighbouring authorities. The IIA has failed to properly assess all sites within the Green Wedge (The Bucknell Family PS25-293)
- The current approach to the DSB is overly reliant on arbitrary boundaries which does not feature in the NPPF. Rather than stifling growth in a Key Service Settlement, a flexible, sustainable outlook could be adopted. This would enable contribution on merit for deliverable well connected sustainable sites including in Great Leighs (Mrs Helen Sadler PS25-58, PS25-59)
- Alternative strategies and new/expanded site allocations promoted by landowners/developers.

CCC response
Minor modification will be proposed to clarify 'regional centre' type facilities.
The Green Wedge is a locally important designation, and the policy and designation are supported by the plan evidence base. Changes to the Green Wedge boundaries to allow development growth has been discounted as there is sufficient and suitable land elsewhere to meet development needs in a sustainable way. No Green Wedge Review is required.
The Settlement Hierarchy is just one of several considerations for the Spatial Strategy, along with the Vision and Spatial Principles, and is considered to be a robust approach.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process and can meet its development requirements without needing to allocate land in the Green Wedge. More information is set out in the Spatial Strategy and Strategic Sites Topic Paper and Preferred Options Local Plan.

Policy DM8 – New Buildings and Structures in the Rural Area

Summary of Representations – main issues and requested changes:

- Policy should allow development of regional scale community facilities (Chelmsford City Football Club PS25-219)
- The current approach to the DSB is overly reliant on arbitrary boundaries which does not feature in the NPPF. Rather than stifling growth in a Key Service Settlement, a flexible, sustainable outlook could be adopted. This would enable contribution on merit for deliverable well connected sustainable sites including in Great Leighs (Mrs Helen Sadler PS25-56).

CCC response
Para 8.103 sets out that community facilities with a wider than local catchment area will be assessed on a site-by-site basis.

The Settlement Hierarchy is just one of several considerations for the Spatial Strategy, along with the Vision and Spatial Principles, and is considered to be a robust approach.
Minor modification will be proposed to para 8.100 to reference to fire & rescue, police and ambulance services instead of emergency services.

Policy DM9 – Infilling in the Green Belt, Green Wedge and Rural Area

Summary of Representations – main issues and requested changes:

- Policy is overly restrictive and contrary to the 2024 NPPF making it unclear for decision-makers. Also unclear how a decision-maker will determine if a gap is 'small' (Mr J Bolingbroke PSQ25-5522)
- Amend the Green Wedge/Belt to extend the western boundary of Robjohns/Widford Employment Area. This site has limited value in the openness of the Green Belt, is inconsistent with the Green Wedge criteria and conflicts with Policy DM4. The employment extension could support growth in this sustainable location, with existing transport and pedestrian links (Saxtons 4x4 PSQ25-6111)
- Alternative strategies and new/expanded site allocations promoted by landowners/developers.

CCC response
The reasoned justification already sets out how to determine a 'small' gap.
The Pre-Submission Local Plan will be examined under the 2023 NPPF so the plan policies have been written to accord with this national policy document.
The Green Wedge is a locally important designation. Changes to the Green Wedge boundaries to allow development growth has been discounted as there is sufficient and suitable land elsewhere to meet development needs in a sustainable way. No Green Wedge Review is required, and the deletion of Green Wedge policies would be inappropriate.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.

Policy DM10 – Change of Use (Land and Buildings) and Engineering Operations

No main issues

Policy DM11 – Extensions to Existing Buildings within the Green Belt, Green Wedge and Rural Area

No main issues

Policy DM12 – Rural and Agricultural/Forestry Workers' Dwellings

No main issues

Protecting the Historic Environment

Consultation point	Total number of responses
Policy DM13 – Designated Heritage Assets	2
Policy DM14 – Non-Designated Heritage Assets	3
Policy DM15 - Archaeology	1

Policy DM13 – Designated Heritage Assets

Summary of Representations – main issues and requested changes:

- Supports policy (Historic England PSQ25-5816)
- Acknowledges the importance of Chelmsford heritage assets. Heritage indirectly features within designing out crime in many respects (Essex Police PSQ25-2668).

CCC response
No comments.

Policy DM14 – Non-Designated Heritage Assets

Summary of Representations – main issues and requested changes:

- Supports policy (Historic England PSQ25-5817)
- Overall agree with the plan proposals. We welcome SP3 and the placing of great weight on the preservation or enhancement of designated heritage assets and their setting and note that Policy DM14 sets out the approach to non-designated heritage assets (Writtle Parish Council PSQ25-454)
- Acknowledge the importance of Chelmsford's heritage assets. Heritage indirectly features within designing out crime in many respects (Essex Police PSQ25-2668).

CCC response
No comments.

Policy DM15 – Archaeology

Summary of Representations – main issues and requested changes:

- Supports policy (Historic England PSQ25-5818).

CCC response
No comments.

Protecting the Natural Environment

Key statistics:

Consultation point	Total number of responses
Policy DM16 – Protection and Promotion of Ecology, Nature and Biodiversity	10
Policy DM17 – Trees, Woodland and Landscape Features	6
Policy DM18 – Flooding/SUDS	6
Policy DM19 – Renewable and Low Carbon Energy	6

Policy DM16 – Protection and Promotion of Ecology, Nature and Biodiversity

Summary of Representations – main issues and requested changes:

- Support policy and welcome the mitigation measures for impacts on internationally designated sites (Paras 8.139 – 8.140). The Chelmsford Green Infrastructure Strategic Plan, Essex LNRS and Essex Green Infrastructure Strategy should be considered for development affecting locally designated sites as well (Natural England PSQ25-6260)
- Support in principle the targets for the Garden Community Developments to deliver 20% Biodiversity Net Gain, though this should not invite offsite top-up requirements (Wates Developments and Hammonds Estates LLP PS22-331)
- Expand Part C(ii) to also include ‘boundary fencing’ to increase biodiversity (East of England Ambulance Service NHS Trust PSQ25-5243)
- Part D(iv) and para 8.145 – to make the policy deliverable and consistent with national policy statements, amend so that the 20% target for the Garden Communities is capped at what is practically deliverable onsite and that offsite top-ups will not be sought (Wates Developments and Hammonds Estates LLP PS22-331)
- Para 8.141 - expand sentence 1 to also refer to the Essex Green Infrastructure Strategy Standards. These standards will facilitate securing multifunctional green infrastructure and are endorsed by Natural England (Essex County Council PS25-235)
- Para 8.143 – welcome but re-order to reference ‘swift, bat and bee bricks' first as these unlike ‘boxes’ are specifically supported by national policy (Swifts Local Network: Swifts & Planning Group PSQ25-3055)
- Para 8.143 – add that existing nest sites for building-dependent species such as swifts should be protected, as these endangered species are declining in Chelmsford. Mitigation should be provided if these nest sites cannot be protected (Swifts Local Network: Swifts & Planning Group PSQ25-3055)
- Clarify that swift bricks are a universal nest brick for small bird species, making them suitable for any development. Add references to best practice

guidance, extensions, and to highlight the protection of existing annual nest sites in buildings (Swifts Local Network: Swifts & Planning Group PSQ25-3055)

- Para 8.144 - expand sentence 3 to also refer to the Essex Green Infrastructure Strategy Standards. These standards will facilitate securing multifunctional green infrastructure and are endorsed by Natural England (Essex County Council PS25-236)
- Para 8.147 – for consistency with latest government guidance (DEFRA March 2024) and Natural England's (2021) Guidelines for Creation of SANG, amend last sentence to read 'Mitigation measures for protected sites (including SANG) can count towards BNG requirements as long as at least 10% of the biodiversity units come from additional activities other than mitigation and compensation.' (Wates Developments and Hammonds Estates LLP PS22-331)
- Policy should not refer to BNG requirements as this repeats national policy (Barratt Redrow PSQ25-5169) and Strategic Policy S4 (Dandara PSQ25-6300)
- The requirement for 20% BNG has not been justified in the Council's evidence base as being financially viable or practically deliverable/viable. It should be expressed as a target rather than an absolute requirement (Croudace Homes PSQ25-6054)
- Oppose the 20% BNG requirement on Chelmsford Garden Community which is not justified. Amend to reflect the approved Development Framework Document i.e. a minimum of 10% BNG per phase with an aspiration of 20% across the site (Chelmsford Garden Community Consortium PSQ25-6341, Vistry Group PSQ25-6364).

CCC response
10% BNG is a national requirement. 20% BNG for the Garden Community allocations has been subject to viability testing and is deliverable. The 20% requirement also accords with the approved planning applications for Zones 1 and 3 for Strategic Growth Site 6.
Minor modification will be proposed to para 8.147 to confirm when mitigation measures for protected sites (including SANG) can count towards BNG requirements
Minor modification will be proposed to para D(iv) and para 8.145 to clarify that the 20% BNG target for the Garden Communities is capped at what is practically deliverable onsite and that offsite top-ups will not be sought.
Minor modification will be proposed to para 8.143 to re-order references to boxes and bricks. Other changes related to nest sites for building-dependent species, nest cups, swift bricks and red-list species are too detailed of the Local Plan but will be considered in the update to the Making Places SPD.
Minor modification will be proposed to paras 8.141 and 8.144 to refer to ECC's Essex Green Infrastructure Strategy and Standards.
A range of biodiversity features that can be considered is included in the reasoned justification and Making Places SPD. Inclusion of a specific policy requirement to increase biodiversity measures and features into boundary fencing is considered too detailed for policy and may not always be appropriate.
The policy includes the BNG targets of 10% and 20% for clarity and completeness.

Policy DM17 – Trees, Woodland and Landscape Features

Summary of Representations – main issues and requested changes:

- Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland (Natural England PSQ25-6261)
- The Environmental Principles must be treated as a foundational component of the plan which must support the protection of sensitive natural assets, such as ancient woodland; be an exemplar of emerging BNG practice; and set high standards for the retention and provision of trees within developments including preserving a 50 metre buffer between new development and ancient woodland, recording Ancient and Veteran Trees on the Ancient Tree Inventory, and assessing the nitrogen impact of ammonia-emitting developments on ancient woodland within 5km of new development (The Woodland Trust PSQ25-1998)
- The Local Plan should require all developments to deliver 20% BNG and all units to be maintained for at least 50 years to support/enable new woodland creation (The Woodland Trust PSQ25-1998)
- The plan should give strong weight to LNRSs for development site allocations to avoid impacts to existing sensitive natural assets and to inform priority locations for the provision of green infrastructure, and habitat creation/enhancement through BNG (The Woodland Trust PSQ25-1998)
- Plan should set standards for high-quality green infrastructure for development including five UKISG-compliant trees per dwelling or per 1,000m2 of non-residential floorspace on major developments. Everyone should be able to see three trees from their home and be no more than 300 metres from the nearest natural green space, with safe and accessible routes (The Woodland Trust PSQ25-1998)
- Consider our ‘Access to Woodland Standard’ which aspires that everyone should have a small wood of at least two hectares within 500 metres of their home and a larger wood of at least 20 hectares within four kilometres of where they live (The Woodland Trust PSQ25-1998)
- Quality of trees, specimen type and location best dictate tree coverage in a development rather than a stringent quantum. For the Meadows, this would lead to over 2,400 trees which cannot be realistically accommodated. It is unclear why the requirement does not apply to non-residential development (Dominus Chelmsford Ltd PSQ25-6208)
- Generally supportive of policy but question three new trees per dwelling in Part C which could lead to development layouts that do not adhere to best practice urban design principles. The priority should instead be to ensure that developments are appropriately landscaped, with suitable planting, to allow for the creation of beautiful places (Dandara PSQ25-6301)
- Welcome increasing tree cover in principle but amend Part C policy to support/encourage rather than ‘require’ three trees per new house as this is not CIL compliant. Although an aspiration of the Council to achieve higher tree cover, there is no causal link between new housing and climate change which can be mitigated by the planting of three new trees aspiration (Vistry PSQ25-142)

- Practical, financial and land take implications that arise from Part C have not been properly considered and the requirements will be difficult for all sites to achieve (Vistry PSQ25-142)
- Part C is not clear or effective. For example, “a significant number of new trees” is not defined, it is unclear if the additional trees form part of or are in addition to the 10% BNG requirement and whether they need to be on site, or if they could be offsite (Barratt Redrow PSQ25-5170).

CCC response
Reasoned justification states that trees for on-site planting will be determined by the size, position, and type of location available.
Minor modification will be proposed to Part A to clarify when financial contributions may be utilised to fund off-site tree planting.
Reasoned justification states that a judgement will be made on a case-by-case basis over what will be considered ‘significant’ in relation to new trees for strategic infrastructure and employment developments taking into account the nature, scale and size of the development, the site and immediate locality with more guidance to be set out in the Making Places SPD.
The Council will use various mechanisms to secure necessary infrastructure, including the Community Infrastructure Levy (CIL), Section 106 legal agreements, Section 278 legal agreements (where relevant) and planning conditions.
Policies S4 and DM17 protects sites of international, national, regional and local nature conservation importance including Ancient Woodlands.
10% BNG is a national requirement. 20% BNG for the Garden Community allocations has been subject to viability testing and is deliverable. Although there is no maximum to the standard, the Council has no plans to go beyond the 10% BNG on all sites as this has not been viability tested.
The plan will ensure that new development maximises opportunities for the preservation, restoration, enhancement, and connection of natural habitats in accordance with the Local Nature Recovery Strategy or future replacements.
The plan sets standards for high-quality green infrastructure in line with the Open Space Assessment 2024.
The requirement for three new trees can count towards BNG.
The policy requirements have been tested through the Local Plan Viability assessments.

<u>Policy DM18 – Flooding/SUDS</u>

Summary of Representations – main issues and requested changes:

- Support for SuDS throughout the plan (Environment Agency PSQ25-6272)
- General support for the policy (Anglian Water PSQ25-6394, Dandara PSQ25-6302)
- The SuDS guidance in Policy S2 may be best placed under DM18 for improved visibility within the Plan (Environment Agency PSQ25-6272)
- Amend policy to take on board recommendation of the SFRA Level 1, reiterated in the Water Cycle Study Stage 2, to ensure SuDS are incorporated in all new development proposals and not just for major development (Anglian Water PSQ25-6394)

- Amend para 8.167 to clarify the preference for above ground SuDS to enhance amenity, biodiversity, habitats and green areas (Essex County Council PS25-237)
- Add a sentence to the end para 8.167 to refer to rainwater harvesting and the need for development to discharge surface water at the greenfield 1 in 1 rate (Essex County Council PS25-239)
- Requests clarification regards Part B(ii) and (iv), as the requirements are not justified based on the supporting text and evidence base. There is no definition of what is meant by flood risk and hence the circumstances when Part B is triggered (Vistry Group PS25-143)
- Comment from landowners/developer suggesting that their proposed development complies with the policy (Dandara PSQ25-6302).

CCC Response
Some high level text to cover our strategic approach to flood risk is necessary in Policy S2 with Policy DM18 providing more detailed requirements. Reference to additional guidance added to DM18 for clarity.
The Council agrees with the sentiment about incorporating SuDS in all new development proposals proposed by Anglian Water, but 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.
The Council agrees with the sentiment of above ground SuDS to enhance amenity, biodiversity, habitats and green areas. However, above ground may not be the best solution. Minor modifications will be proposed to the reasoned justification in response to these comments, referring to a principle in the National Standards for Sustainable Drainage issued by DEFRA in June 2025.
The use of rainwater harvesting is already covered by Policy DM25, likewise Policy DM18 already refers to surface water not exceeding the 1 in 1 greenfield rate in areas of flood risk which includes CDAs so it does not need to be repeated in the reasoned justification.
No changes required to Part B (ii) of the policy, it covers flood risk from surface water run-off. Minor modifications will be proposed to Part B (iv) to make it clearer what sustainability measures are required. In addition, minor modifications will be proposed to the reasoned justification to help define ‘flood risk’.

Policy DM19 – Renewable and Low Carbon Energy

Summary of Representations – main issues and requested changes:

- Supports policy but expand penultimate paragraph to have regard to the relevant tests for planning obligations in the NPPF in relation to community benefits (Infrabee PSQ25-5740, PSQ25-43)
- Amend (iii) to demonstrate no unacceptable ‘significant’ adverse effect in line with NPPF Para 193 (Infrabee PSQ25-5740, PSQ25-43)
- The Environment Agency regulates ground source heating and cooling systems. The system may require an abstraction licence and an

environmental permit, or exemptions may apply. Add a reference to our 'Closed loop ground source heating and cooling systems' and 'Open loop heat pump systems' guidance on gov.uk (Environment Agency PSQ25-6273)

- Consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure in future iterations of the Local Plan including around SWF (Infrabee PSQ25-5740, PSQ25-43)
- No objection in principle to any renewable energy development, though some infrastructure by virtue of their physical dimensions and properties, may impact upon military aviation. Planning Practice Guidance provides specific guidance on when to consult the MOD in relation to MOD safeguarding requirements (Defence Infrastructure Organisation PSQ25-6407)
- Nationally, solar farms and battery storage facilities are vulnerable to organised crime groups. It is important that facilities are designed to be safe and secure and that security proposals are risk assessed (Essex Police PSQ25-2674).

CCC response
Minor modification will be proposed to para 8.173 to reference guidance.
Minor modifications will be proposed to policy for proposals to have no significant harm on the natural environment.
The policy scope is considered appropriate and compliant with national policy.

Delivering and protecting Community Facilities

Consultation point	**Total number of responses**
Policy DM20 – Delivering Community Facilities	4
Policy DM21- Protecting Community Facilities	3
Policy DM22 – Education Establishments	2

Policy DM20 – Delivering Community Facilities

Summary of Representations – main issues and requested changes:

- Support policy (Dandara PSQ25-6303)
- Welcome policy but amend criterion (i) to allow sustainable transport connections to be delivered as part of the proposed new development (Chelmsford City Football Club PS25-221)
- Support expressed for policy but move criterion (vi) to a separate item and rephrase to encourage flexibly designed spaces where practical, as community facilities may be designed for a specific purpose, making flexibility for other uses impractical or financially unviable (Vistry Group PS25-342)
- Welcome policy which takes a positive approach towards new or extended community facilities which include indoor and outdoor sports facilities as supported by the Council's evidence base and the NPPF (Sport England PS25-92)

- Alternative strategies and new/expanded site allocations promoted by landowners/developers.

CCC response
Minor modification will be proposed to policy to refer to existing and proposed sustainable connections.
Minor modification will be proposed to policy to refer to clarify requirements around flexibility and shared use of a facility.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.

Policy DM21 – Protecting Community Facilities

Summary of Representations – main issues and requested changes:

- Welcome policy which will seek to protect sports facilities as supported by the Council's evidence base which identifies deficiencies in the provision of facilities such as playing fields (Sport England PS25-93)
- Support policy in principle but it should be more flexible. Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Local Plan should support the principle of alternative uses with no requirement for retention of a community facility use on the land (NHS Property Services Ltd PSQ25-5601)
- Support expressed for policy but expand Part A to recognise that a facility could be made viable under an alternative operating/ownership model such as community ownership (Theatres Trust PSQ25-357)
- It is imperative that the ongoing use of the allotment site at Princes Road, Chelmsford should be maintained, and any future change of use (due to potential sale of land) should be resisted. Any change of use would increase the area's allotments deficit. It is a green space and wildlife corridor, allotment gardening promotes healthy living, and the allotment association has strong community links (Princes Road Allotment Association PS25-46).

CCC response
It is not reasonable to exclude healthcare sites/properties from Part B - proposals would still need to demonstrate these tests.
It is not necessary to add additional wording in relation to an alternative operating model.
There are no proposals to change the Princes Road allotment site in the plan which is designated on the Draft Policies Map.

Policy DM22 – Education Establishments

Summary of Representations – main issues and requested changes:

- There is no need for an 'agreed masterplan' with ARU in addition to the Special Policy Areas for ARU Writtle. Amend the policy to support the expansion of ARU in the context of the adopted Local Plan and ARUs own Development Framework to which the Council can contribute. The Council's masterplan procedure does not cover ARU and would be costly, inflexible and fail the need for Plans 'to serve a clear purpose' as set out in para 16 of the NPPF (Anglia Ruskin University PSQ25-6220)
- Para 1.890 – amend reference to the 10 Year Plan to reflect it is regularly updated and provide additional clarification around the redevelopment of independent schools to read: 'The redevelopment of school sites should not be precluded in the event that provision could be enhanced or the area better served by consolidating assets and reinvesting capital receipts.' (Essex County Council PS25-240).

CCC response
Proposals for expansions would still be required to be considered against a masterplan particularly for ARU as it is located within a SPA where development would otherwise be constrained.
Minor modification will be proposed to amend the reference to the 10 Year Plan and additional clarification around the redevelopment of independent schools.

Making High Quality Places

Section 9 - Making Places

Consultation point	**Total number of responses**
Policy DM23 – High Quality and Inclusive Design	3
Policy DM24 – Design and Place Shaping Principles in Major Developments	5
Policy DM25 – Sustainable Buildings	20
Policy DM31 – Net Zero Carbon Development (In Operation)	15
Policy DM26 – Design Specification for Dwellings	1
Policy DM27 – Parking Standards	3
Policy DM28 – Tall Buildings	4

Policy DM23 – High Quality and Inclusive Design

Summary of Representations – main issues and requested changes:

- Recommends that crime is a material consideration for good design, to ensure new developments are safe and inclusive for all, mitigating the opportunities for crime through building strong, healthy, cohesive, accessible, vibrant, and participatory communities (Essex Police PSQ25-2675)
- Support the aspirations for development that is respectful of the character and appearance of the area; however it is not appropriate to cross-reference Policy DM25 as part of this policy and it is proposed part (b)(vii) is removed (Vistry Group PSQ25-6377)
- The use of words maximise and minimise does not provide clarity of the requirements for new development (Vistry Group PS25-144).

CCC Response
The Police are consulted on planning applications, and design considerations are covered in detailed design guidance published in the Making Places SPD.
Minor modification will be proposed to clarify that Policy DM25 applies to development proposals.

Policy DM24 – Design and Place Shaping Principles in Major Developments:

Summary of Representations – main issues and requested changes:

- Support the policy, and in particular the reference to Sport England's Active Design Guidance (Sport England PS25-94)
- Suggest that the inclusion of 'safe, secure and sustainability' concepts are embedded within the Design and Place Shaping Principles (Essex Police PSQ25-2676)
- Modification suggested to include a reference to development types including boundary fencing in relation to biodiversity (East of England Ambulance Service NHS Trust PSQ25-5244)
- It is important to ensure that there is sufficient distinction on sites between spaces intended for public recreation and those prioritised for wildlife conservation. Additional text suggested for a requirement for native species for all planting and habitat restoration (Environment Agency PSQ25-6275)
- The policy could be improved by providing additional information about when public art will be required to be delivered in major developments, or at least the kind of art that is expected in smaller development (Dandara PSQ25-6304).

CCC Response
Minor modification will be proposed to add reference to 'safe and secure' to 9th bullet; and reflect additional guidance on safety for women and girls at Para 9.17.
The Tree Planting Advice Note referenced at para 9.14 sets out the Council's approach to native species and lists appropriate species.
Measures to promote biodiversity are covered by Policy DM16.

Public art is considered on a site-by-site basis as it should be site specific and relate to local context; advice for developers is published on the Council's website.

Policy DM25 – Sustainable Buildings

Summary of Representations – main issues and requested changes:

- General support for the objectives of the policy (Vistry Group PS25-146)
- As Chelmsford resides wholly in an area of serious water stress the requirement for all new dwellings to achieve a water efficiency standard of 90 litres/person/day or greater is welcome. It is essential that this requirement remains evidence based (Environment Agency PSQ25-6276)
- Support for a water efficiency standard of 90 litres/person/day (Anglian Water Services Ltd PSQ25-6395)
- Given Essex is a seriously water stressed area, reduce the water efficiency standard to 80 litre/person/day. The Water Strategy for Essex (WSfE) recommends Local Plans should set ambitious policies on water efficiency (Essex County Council PS25-241)
- Welcome requirement for non-residential development to achieve full credits for category Wat 01 of BREEAM standards (Essex County Council PS25-241)
- 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 (Anglian Water Services Ltd PSQ25-6395)
- Support the need to provide integrated water management techniques to optimise rainwater harvesting on site to minimise overall water consumption and maximise its reuse (Essex County Council PS25-243)
- Challenge the requirement for 90 litres/person/day which is not supported by evidence (Home Builders Federation (PSQ25-5479, Barratt Redrow PSQ25-5171, Croudace Homes PSQ25-6051, Dandara PSQ25-6305, Gladman Developments Ltd PSQ25-6326, CHP PSQ25-2983, Sempra Homes PSQ25-3112)
- The most effective approach to securing long term water efficiency reductions is through nationally agreed regulations not ad hoc requirements in local plans (Home Builders Federation PSQ25-5479)
- A 2023 Ministerial Statement stated that where water scarcity is inhibiting the adoption of Local Plans, local planning authorities should work with the Environment Agency and delivery partners to agree standards tighter than the 110 litres/person/day, this does not appear to be the case in Chelmsford (Home Builders Federation PSQ25-5479, Gladman Developments Ltd PSQ25-6326)
- Retain 110 litre/person/day in line with Building Regulations and the approved Development Framework Document for Chelmsford Garden Community (Chelmsford Garden Community Consortium, PSQ25-6342, Vistry Group PSQ25-6365)

- We normally encourage BREEAM “Excellent” for developments over 1000sqm, but the policy meets our minimum requirements (Environment Agency PSQ25-6276).
- Applying BREEAM to developments under 1,000sqm is unlikely to lead to enhanced sustainability design as the assessment and certification costs for new construction becomes increasingly significant for smaller development. This can affect the provision of measures which would otherwise enhance the design of the development (Chelmsford Garden Community Consortium PSQ25-6349, Vistry Group PSQ25-6371).
- Remove the 3 water efficiency credits requirement. Smaller development will struggle to meet this which goes beyond requirements for a Very Good BREEAM rating and has not been considered in the updated viability assessment (Chelmsford Garden Community Consortium PSQ25-6349, Vistry Group PSQ25-6371).
- Policy should accord with Building Regulations to allow the most appropriate technologies and techniques to be implemented in all developments (Dandara PSQ25-6305)
- Supports the provision of EV charging points but requirements should accord with Building Regulations. Provision over and above this has not been accounted for within the viability assessment (Chelmsford Garden Community Consortium PSQ25-6343, Vistry Group PSQ25-6366).
- Given the provision of EV charging points in Building Regulations, the policy should be removed or align with Building Regulations (Chelmsford Garden Community Consortium PSQ25-6348)
- Question the need to request EV charging points for residential development given that the relevant standards are set out in Building Regulations (Home Builders Federation PSQ25-5479, Croudace Homes PSQ25-6051, Gladman Developments Ltd PSQ25-6326, Vistry Group PS25-146, CHP PSQ25-2983, Sempra Homes PSQ25-3112)
- Additional guidance may be required for on street/public charging points that is not addressed in Part S of Building Regulations (Home Builders Federation PSQ25-5479)
- The Essex Car Parking Standards (2024) do not justify why more onerous EV standards should apply over Building Regulations requirements and just link back to national policy (Vistry Group PS25-146).

CCC Response
The Council has no evidence to support increasing the water efficiency requirements to 80 litres/person/day.
The stricter water efficiency requirement in the plan is supported by the plan evidence base notably the Detailed Water Cycle Study. 90 litres/person/day has also been viability tested.
Minor modification will be proposed to cross reference to Policy DM18 in relation to integrated water management measures.
EV charging point infrastructure requirements have been updated to reflect ECC’s Parking Standards update; therefore, the reference to the EV parking standards set out in the Policy is considered appropriate.
Further guidance for on street/public charging points is contained within the Essex Parking Guidance Part 1: Parking Standards Design and Good Practice (2024).

BREEAM is a widely recognised tool for assessing and improving sustainability of buildings. It can be used on schemes of any size at the discretion of the Local Planning Authority. The Council realises that there are other factors that are important as well such as the complexity of a building, however the threshold of 500sqm has been set to allow for economy of scale and avoids imposing the requirement on modest structures.

Policy DM31 – Net Zero Carbon Development (In Operation)

Summary of Representations – main issues and requested changes:

- Support the policy. Essex Open Legal Advice Part B – Energy policy prior to local plan adoption advice reconfirms, that nothing in recent government policy or recent case law prevents LPAs from including policies requiring fabric standards and local energy efficiency greater than Building Regulations in either their Development Plan Documents or in SPDs, so long as there is a robust evidence base for such policies (Essex County Council PS25-246)
- The Environment Agency regulates ground source heating and cooling systems. The system may require an abstraction licence and an environmental permit, or exemptions may apply (Environment Agency PSQ25-6274)
- There is no justification to go beyond the December 13th 2023 Written Ministerial Statement, national policy requirements and applying the policy will impact house building timeframes and viability (Vistry Group PS25-145, Newell Properties Development Ltd PSQ25-5052, Barratt Redrow PSQ25-5172, Home Builders Federation PSQ25-5481, Croudace Homes PSQ25-6052, Anglia Ruskin University PSQ25-6216, Chelmsford Garden Community Consortium PSQ25-6052, Hopkins Homes Ltd PS25-265, Richborough PS25-179, Dandara PSQ25-6306)
- Development should not be required to exceed Building Regulations Part F and L. The Future Homes Standard should be the national approach (Gladman Developments Ltd PSQ25-6327, Hopkins Homes Ltd PS25-265, Richborough PS25-179)
- The policy goes beyond national policy and guidance without evidence to justify the approach towards net zero operational and the use of on-site renewables to provide all (regulated and unregulated) operational energy. In line with the PPG locally set energy performance standards for new housing should not exceed the equivalent of Level 4 of the Code for Sustainable Homes (Croudace Homes PSQ25-6052)
- The policies should not be a requirement but advisory and applied flexibly in a stepped approach (Croudace Homes PSQ25-6052, Chelmsford Garden Community Consortium PSQ25-6350, Richborough PS25-179, Wates Developments and Hammonds Estates LLP PS25-333)
- BREEAM should only be applied to development over 1,000sqm (Vistry Group PSQ25-6372)
- For the Council to require standards above those set out in Building Regulations they must be expressed as a percentage of the target emission rate and not as an energy use target (Home Builders Federation PSQ25-5481)

- The Council's Viability Update Note 2024 suggests the costs of achieving the policy to be 8% above current regulations, this seems low, and is lower than the cost of delivering net zero homes in the Council's earlier evidence which cited it would be 12.5% of the cost of construction (Home Builders Federation PSQ25-5481)
- Requirement 4 provides no flexibility in the delivery of renewable energy and essentially mandates roof top solar PV energy regardless of whether this remains the most effective form of renewable energy generation over the plan period. Alternative forms of sustainable energy generation that could result in equivalent benefit or carbon saving should be considered (Barratt Redrow PSQ25-5172, Anglia Ruskin University PSQ25-6216)
- Designs to suit solar orientation could lead to conflict between design and energy policies (Barratt Redrow PSQ25-5172)
- Requirement 5 is not clear whether this information would need to be signed off under a formal discharge of condition and it is unclear what is meant by "as built performance information". There is also a practical conflict in how this proposed policy would operate. To comply with this policy, as drafted, a home would need to remain empty after the issue of a Final Certificate until the required as built performance information has been submitted and approved by the Local Planning Authority (Barratt Redrow PSQ25-5172)
- Design policies and design codes will need to ensure that development is not refused for seeking to meet energy efficiency standards but, for example, not potentially being designed in the character of the local area (Home Builders Federation PSQ25-5481)
- Policy should require a development to be net zero rather than for individual homes as some, such as terrace houses and flats, are more intrinsically energy efficient and emit less carbon compared to detached homes and bungalows (Home Builders Federation PSQ25-5481)
- The size threshold for requirements 1-5 to apply is too low. Reference to 100sqm should be replaced with 1,000sqm. This larger size threshold not only facilitates greater flexibility to enable modest developments to progress without the time and cost restrictions associated with the targets but also reflects the definition of 'major development' in planning terms (Anglia Ruskin University PSQ25-6216)
- The need for a financial contribution in lieu of sufficient on-site renewable sources to offset annual demand of the building(s) in question is not considered to meet the tests of soundness. Whilst it is accepted that certain profitable projects may well be able to fund the off-site PV contribution, it is suggested that certain developments and/or uses should be excluded from the need to pay off site contributions (Anglia Ruskin University PSQ25-6216)
- Modifications to requirements 1 and 3 are required to align with the UK Net Zero Carbon Building Standard Pilot (NZCBS) 2024 as this is the industry's current leading Net Zero Carbon definition (Wates Developments and Hammonds Estates LLP PS25-333).

CCC Response
Reference to the fact the Environment Agency regulates ground source heating and cooling systems, and that these may require an abstraction licence has been

added to the reasoned justification for Policy DM19, as well as web links to relevant guidance.
Building Regulations (including the Future Homes Standard) set minimum standards that must be achieved for energy performance in new homes and buildings - but these are a 'floor' and not a 'ceiling'. Local authorities are allowed to set higher standards. Planning policy is necessary to address the shortcomings within the Building Regulations 2021 and the proposed Future Homes Standard 2025. These do not adequately address operational carbon emissions from new development as they only cover a proportion of energy use of a building, namely regulated energy use and they rely on grid decarbonisation to achieve 'net zero'.
The approach of using energy metrics to deliver net zero homes aligns with the recommendations of the Government's own advisors, the Climate Change Committee. They recommended a space heating target of 15-20 kwh/m2/year for all new homes by 2025. Policy DM31 sets a space heating requirement that reflects the Climate Change Committee's advice, and which is based on a robust and sound technical evidence base, which includes assessment of potential impact on viability.
The legal justification for Policy DM31 is clearly set out in the Essex Open Legal Advice - Energy Policy and Building Regulations (2025 update) ((Pre-Submission Local Plan Evidence Base reference CC004) which includes an examination of climate science, legislation, national policy (including the Written Ministerial Statement) and relevant case law. The technical evidence base for Greater Essex that supports the justification for the approach taken in the policy.
The 'net zero' evidence base developed for Greater Essex demonstrates that the policy is technically feasible to deliver and at reasonable cost. There are no significant barriers to delivery in terms of skills and supply chains in Essex. In other areas (e.g. Cornwall, Bath and North East Somerset) where the equivalent policy has been in place has also shown that there has been no slowdown in the submission of planning applications or delivery of housing. The Council's Viability Update Note 2024 adjusts the cost assumptions associated with achieving net zero in accordance with the latest information reported in the Essex Net Zero Policy – Technical Evidence Base produced by Introba Consulting Ltd with Currie & Brown and Etude for Essex Couty Council. Research referred to in the Essex Open Legal Advice – Energy Policy and Building Regulations (2025 update) (Para 54 – 55) ((Pre-Submission Local Plan Evidence Base reference CC004) provides evidence of an uplift in values too which is also positive for viability.
When a Planning application is submitted for a site (regardless of whether it is allocated or not) planning law requires that it must be determined in accordance with the Development Plan (in place at the time) unless material considerations indicate otherwise. However, increasing weight should also be given to policies contained in the emerging Local Plan as it progresses through the Local Plan preparation process. It will be a matter for the Development Management process to determine the weight given to emerging policies in the planning balance when coming to a decision on an application.
For older persons housing that is in the form of self contained residential units then the policy requirements all apply. However, for 'non residential buildings' (which the reasoned justification notes includes older persons housing that is in the form of a residential institution) then the limit set in requirement 3 of the policy does not

apply, and instead the Energy Use Intensity just needs to be reported – no specific target is required to be met. The technical evidence includes cost analysis of the typologies modelled and this has been used to inform the viability assessment for the Local Plan. An allowance has been made for the policy costs in the viability assessment and is shown to be viable.
Policy DM31 sits alongside the Building Regulations, including the Future Homes Standard. The policy works with the Future Homes Standard not against it. The policy uses an accurate, predictable metric (the total energy use of a building) and this is needed to make up for the inadequacies of the Future Homes Standard (which uses a changeable % carbon metric based on only around half the energy used in a building) and ensure truly net zero carbon and energy (in operation) new homes and buildings are delivered in Chelmsford, and the associated benefits are realised for residents, climate and the grid. There is a wide consensus around the approach set out in the policy based on energy metrics to deliver truly net zero carbon and net zero energy homes and buildings. Furthermore, the Essex-wide Evidence Base (that has already been found as robust and sound by the Planning Inspector for the Tendring Colchester Borders Garden Community DPD), together with the Chelmsford Local Plan viability evidence, provides clear justification for the Policy to go beyond current and proposed Building Regulations.
It would inhibit the effectiveness of the policy if it was advisory only. Applying the policy 'flexibly in a stepped approach' would create uncertainty among developers regarding what is required and what is only advised, increasing the workload of local authority planning officers who will have to communicate these stepped changes to developers. This outcome can be avoided if all the standards in the policy are implemented as requirements from the point of plan adoption. It should also be noted that the policy itself has elements of flexibility within it. An offsetting mechanism is available as part of Requirement 4 to allow developments to achieve compliance where it is not technically possible to match on-site renewable energy generation with annual average energy demand. The energy performance standards are requirements but how they should be met is not specified which gives developers freedom and flexibility in the design choices adopted to achieve the standard. In addition, alternative routes to compliance are set out for minor development proposals and also for buildings that are certified Passivhaus.
The policy does not have to be expressed as a percentage of the Target Emission Rate. This is an inferior method to the one that DM31 uses is referred to in the Written Ministerial Statement 13 Dec 2023. However, the Essex Open Legal Advice – Energy Policy and Building Regulations (2025 update) (Pre-Submission Local Plan Evidence Base reference CC004) clearly sets out the legal justification for using a different approach to the one referred to in the Written Ministerial Statement, such as the energy metrics approach set out in DM31. Policy DM31 sets standards which use energy metrics – expressed as kilowatt hours per square metre of floor area per year (kWh/m^2/yr). This approach aligns with best practices recommended by leading industry bodies and experts. The Essex Open Legal Advice – Energy Policy and Building Regulations (2025 update) also provides the legal justification for setting policies such as DM31 that use energy metrics.

The Inspector's Report on the Tendring Colchester Borders Garden Community Development Plan Document (TCB GC DPD) provides further endorsement to the quality and robustness of the Essex Evidence Base. The Inspector's interpretation of how the Written Ministerial Statement 2023 should be treated in that case was consistent with the Essex advice.
The technical evidence (CC005 and CC006) that underpins Policy DM31 demonstrates that roof top solar PV is by far the most cost effective, and mature, and readily available, renewable energy generation technology that also delivers direct benefits (such as reduced energy costs) to residents and occupiers. It is therefore pragmatic to include it in the policy requirement for renewable energy generation as it demonstrates that the policy requirement is deliverable at reasonable cost. At this moment, there is no evidence to suggest that there is a more productive and cost effective method than solar rooftop PV, which can also deliver direct benefits to residents and occupiers. However, in future if a technology becomes more suitable then this can be addressed through the 5 year review of the Local Plan.
CC006 Essex net Zero Policy – Summary of Policy Evidence and Validation Requirements 2023 sets out the necessary information to be provided at relevant stages of development in order to comply with the policy. The Essex Net Zero Implementation section of the Essex Design Guide. provides support the transition of small / medium developers who may have not yet invested in predictive energy modelling software, the Essex Energy Tool (SAP Conversion) has been developed for use on housing proposals of under 100 dwellings. This tool can take the outputs of the Building Regulations compliance software (known as SAP – Standard Assessment Procedure) and indicate whether compliance with the policy requirements for space heating demand, total energy use (energy use intensity) and Solar PV generation has been achieved. A *Net Zero Implementation and Monitoring Guide* is also under preparation and will provide further instruction on how as-built performance information can be gathered.
Additional clause added to requirement 3 to allow flexibility, in exceptional circumstances, on larger sites to meet the energy use intensity target under requirement 4 on each individual phase via a site-wide average rather than each individual property.
The energy offsetting mechanism enables flexibility in the policy to accommodate those developments where it is not technically feasible to achieve an on-site energy balance and provide a way for them to still achieve 'net zero'. This is a well-established, accepted principle and approach and has been found sound by the Planning Inspectorate on numerous occasions, including in Essex (through the Tendring Colchester Borders Garden Community DPD).
Clarification to what 'maximised' means in relation to requirement 4 is proposed to be added to the supporting text. The renewable energy requirement clause is also proposed to be simplified so that it just relates to achieving energy balance on-site (including offsetting where this is justifiably triggered) and does not go beyond this (unless a developer wishes to).
The policy applies to 1 dwelling and above, and this is supported by the evidence base. All new homes and buildings need to be delivered to truly net zero carbon in operation standards and achieve operational energy balance in order to align with climate targets and deliver the wider co-benefits relating to energy, health, and costs / savings for residents and society as a whole.

Policy DM31 is underpinned by its own technical evidence developed specifically for Greater Essex (particularly the Essex Net Zero Policy Study 2023, CC005 and CC006). Policy DM31 only addresses operational energy and carbon emissions, and it does not address embodied carbon emissions. The UK NZCBS takes a whole life carbon approach and seeks to recommend standards to reduce both operational and embodied carbon emissions.

Policy DM26 – Design Specification for Dwellings

Summary of Representations – main issues and requested changes:

- Suggest that the inclusion of 'safe, secure and sustainability' concepts are embedded within the Design and Place Shaping Principles (Essex Police PSQ25-2677).

CCC Response
The Police are consulted on planning applications, and design considerations are covered in detailed design guidance published in the Making Places SPD.

Policy DM27 – Parking Standards

Summary of Representations – main issues and requested changes:

- Any new proposed public car parks should seek to achieve Park Mark accreditation (Essex Police PSQ25-2678)
- Support for the policy, including reference to bespoke parking standards for Chelmsford Garden Community (Chelmsford Garden Community Consortium PSQ25-6344, Vistry PSQ25-6367).

CCC Response
Specific consideration of crime and personal safety are required by the 2024 Essex Parking Guidance, adopted by the Council.

Policy DM28 – Tall Buildings

Summary of Representations – main issues and requested changes:

- Support for the policy, and references to heritage assets (Historic England PSQ25-5819)
- Recommends the use of Secured by Design (SBD) Police Preferred Security Products (Essex Police PSQ25-2680)
- Design should ensure sufficient corridor space for safe evacuation and access by emergency services; would welcome financial contributions as required by fire and rescue facilities for equipment to support rescue (East of England Ambulance Service NHS Trust PSQ-5246)
- Suggest the policy should also apply to other locations that are well served by public transport (Vistry Group PSQ25-6387).

CCC Response
Reference to Secured by Design is considered too detailed for this policy, but it is covered in detailed design guidance published in the Making Places SPD.
Proposals outside the City Centre will be considered on their merits, where a view on the suitability of other locations can be taken.

Policy DM29 – Protecting Living and Working Environments

Consultation point	Total number of responses
Policy DM29 – Protecting Living and Working Environments	0
Policy DM30 – Contamination and Pollution	1

No comments.

Policy DM30 – Contamination and Pollution

Summary of Representations – main issues and requested changes:

- Pleased with the water quality wording in all policies and satisfied that wastewater treatment capacity and local water environment will be protected by the plan policies (Environment Agency PSQ25-6269)
- Welcome the policy. Appreciate reference to the relevant Land Contamination Remediation Methods guidance in para 9.97 but move to para 9.95 or a separate paragraph as the process is relevant to any sites managing the risks from land contamination, which may include non-hazardous pollutants and not only those where hazardous substances are present (Environment Agency PSQ25-6269).

CCC Response
Minor modification will be proposed to para 9.97 to move reference to the Land Contamination Remediation Methods guidance to a separate paragraph.

Monitoring Framework

Consultation point	Total number of responses
Table 8	0

No main issues

Draft Policies Map

This section of the consultation document sets out the Draft Policies Map which illustrate sites for development or protection within the Local Plan.

Consultation point	Total number of responses
Draft Policies Map (Paragraphs 11.1-11.3)	0
Map 1 – Chelmsford North	1
Map 3 – Chelmsford Urban Area	5
Map 4 – Chelmsford City Centre	1
Map 8 - Bicknacre	2
Map 9 – Boreham	1
Map 11 – Chatham Green	0
Map 13 – East Hanningfield	1
Map 16 - Galleywood	1
Map 18 – Great Leighs	1
Map 23 – Little Waltham	1
Map 37 – Writtle	1
Rural Employment Areas	0
Other Maps	0
Legend	0

Chelmsford Urban Area (Map 3) Summary of Representations – main issues and suggested changes:

- Support in general but identify the Marriage Mill Cranham Road as a new employment area which has permission for 3,400sqm of B2/B8 floorspace (W & H Marriage & Sons Limited PSQ25-6057)
- Either delete 'Area for Conservation/Strategic Enhancement' notification for Site 16a, say it is illustrative or amend to 'Land Allocated for Future Recreation Use and/or SuDS and/or Biodiversity and/or Solar/Appropriate Renewable Energy Generation' (Wates Developments and Hammonds Estates LLP PS25-301)
- Extend the New Garden Community for Major Housing and Employment Development annotation at Site 16a to include Land Adjacent to Sandford Mill Lane and Land at Rumbolds Farm (as shown on submitted Appendices 1A and 1B of our Written Representations) so that the map is justified by appropriate evidence; and to contribute to housing, employment and energy delivery to support other policies in the plan (Wates Developments and Hammonds Estates LLP PS25-301)
- The settlement boundary should be reviewed to include the promoted site south of Church Road in Great Baddow given the introduction of Grey Belt in the NPPF 2024. The site does not contribute strongly to Green Belt purposes and is sustainably located (Newell Properties Development Ltd PSQ25-5050)
- A small-scale alteration to the Green Wedge/Green Belt boundary should be considered and an extension to the Employment Area allowed at Robjohns Road, Rodney Way in line with national policy. This would enhance the local rural economy and provide additional local infrastructure (Saxtons 4x4 PSQ25-6112)
- The employment areas designation on the corner of Brook Street and New Street (the former Kay-Metzeler premises) should be amended to identify an

employment area designation for the eastern part of the site and a mixed use residential and commercial allocation for the western part of the site (HEVF Self Storage UK Limited PSQ25-6337)

- The Urban Area Boundary and Green Belt boundary should be amended to incorporate land south of Galleywood Road which has no other constraints other than the Green Belt designation (Taylor Wimpey Strategic Land PSQ25-5448)
- Allocate land at Bulls Lodge Farm for residential development or include it in Chelmsford Urban Area, given its proximity to Beaulieu Park station (Sean Culleton PSQ25-1587)
- Amend the boundary of SGS3c to include the SuDS area to the east (Barratt Redrow PSQ25-5167).

Boreham (Map 9) Summary of Representations – main issues and suggested changes:

- Land to the north of Orchard Way should be included in the settlement boundary together with the Council acquired site to the north to reflect the development potential of the sites. This can facilitate development with minimal impact (Urban Provincial PSQ25-4979).

Chatham Green (Map 11) Summary of Representations – main issues and suggested changes:

- Change the settlement boundary for Chatham Green to include all the built form of the village i.e. Baileys Cottage, the Windmill Pub, the two dwellings next to the village green and the industrial site, Pondside Nursery and Yard (Mr and Mrs Andrew Parker PS25-99).

East Hanningfield (Map 13) Summary of Representations – main issues and suggested changes:

- Support expressed including the identification of Growth Site 17a (Chelmsford Diocese Board of Finance PSQ25-718).

Galleywood (Map 16) Summary of Representations – main issues and suggested changes:

- Undertake a Green Belt Review and reflect its conclusions on the Policies Map. This would require changes to Map 16 to include a promoted site at Beehive Lane (BDW Eastern Counties PSQ25-6031).

Great Leighs (Map 18) Summary of Representations – main issues and suggested changes:

- The current approach to the DSB is overly reliant on arbitrary boundaries which does not feature in the NPPF. Rather than stifling growth in a Key Service Settlement, a flexible, sustainable outlook could be adopted. This would enable contribution on merit for deliverable well connected sustainable sites including in Great Leighs (Helen Sadler PS25-31)

- It is essential that the boundaries are logical, easily identifiable and follow property boundaries, permanent features and encompass suitable undeveloped sites and that historical use is acknowledged (Mrs Helen Sadler PS25-60 & 63).

Little Waltham (Map 23) Summary of Representations – main issues and suggested changes:

- Remove the Green Wedge from the promoted site adjacent to 148 The Street. This is a sustainable location in a Service Settlement outside the Green Belt, lacking any development constraints (Paul Hopkins PSQ25-6391).

Writtle (Map 37) Summary of Representations – main issues and suggested changes:

- Support the SPA for ARU Writtle (Anglia Ruskin University PSQ25-6217)
- Remove the 'Open Space' designation on ARU Writtle at Sturgeons Farm as there are no specific land uses that warrant this (Anglia Ruskin University PSQ25-6217).

CCC Response
The boundaries and notations are supported by the plan evidence base including the Employment Land Review 2023 and Focused Update 2024, Chelmsford Strategic Housing Needs Assessment 2023 & Addendum 2024, Chelmsford Strategic Flood Risk Assessments Level 1 (February 2024) and Level 2 (May 2024), Urban Area and Defined Settlement Technical Note 2024 and Short Note 2025.
SPAs are defined within and around existing facilities and institutions to enable their operational and functional requirements to be planned in a strategic and phased manner. BAE Systems is already designated as an Employment Area in the Green Belt and most of the designated Employment Area is promoted for residential redevelopment. A SPA designation for this site would not be appropriate.
Land at Cranham Road is being developed for new headquarters for W & H Marriage & Sons Ltd. Other policies in the plan will enable any future proposals to be considered. A SPA designation for this site would not be appropriate.
The plan allocates a range of employment sites to meet the employment floorspace requirements in Policy S6 and to allow for a range of different employment uses to come forward, where appropriate – no further modifications required.
A range of alternative development sites and strategies have been considered and rejected when developing the Spatial Strategy. More information is set out in the Spatial Strategy and Strategic Site Pre-Submission Topic Paper and Preferred Options Local Plan.
The proposed former Kay Metzeler site allocation was removed from the Pre-Submission Local Plan following a change of circumstances. However, the site is now proposed for inclusion in the Focused Consultation Additional Sites Document to support increased housing requirements.
There are no proposed changes to the Green Belt. Proposed site allocations are focused on settlements outside the Green Belt, informed by a Settlement

Hierarchy to help select sustainable locations. The Council can meet its development requirements without needing to undertake a Green Belt review. The Pre-Submission Local Plan will be examined under the 2023 NPPF which does not refer to Grey Belt.
The DSB Settlement Boundary Review Criteria states that boundaries should normally follow clearly defined physical features such as walls, tree lines, mature hedgerows, field boundaries, roads and footpaths. The Urban Area Boundary/DSB will generally be drawn approximately 25m from the rear and side elevations of houses with large gardens. This is to allow for extensions but to prevent backland development which could harm the character of the open countryside.
The DSB has been drawn tightly around Chatham Green because other areas within the village are characterised by large houses with spacious grounds. Including these areas within the DSB could leave the village vulnerable to significant new development, inappropriate to a village of this size with very limited services and facilities.
The Green Wedge is a locally important designation. Changes to the Green Wedge boundaries to allow development growth has been discounted as sufficient and suitable land is available elsewhere to meet development needs in a sustainable way.
The 'Open Space' designation at Sturgeons Farm, ARU Writtle (SPA6) is classified as semi-natural open space which is inaccessible to the public. This is consistent with the land use and should be retained in accordance with the 2024 Open Space Assessment.
The site boundary of SGS3c includes the land allocated for future recreation use/or SuDS and/or biodiversity within the wider site boundary.

Appendices

This section of the consultation document contains four appendices.

Consultation point	Total number of responses
Appendix A – Schedule of Superseded Documents and Policies	0
Appendix B – Development Standards	2
Appendix C – Development Trajectories	7
Appendix D – Glossary	1

Summary of Representations – main issues and requested changes:

Appendix B

- Table 16 - the total provision of open space for developments of 30 dwellings or more is 94sqm per dwelling. This compares with 59sqm in the adopted plan with the introduction of ‘natural and semi-natural greenspace’. Further justification for this increase is required, and its impact on the deliverability of

strategic sites considered (Chelmsford Garden Community Consortium PSQ25-63653, Vistry Group PSQ25-6381).

Appendix C

- Object to the trajectory as there are aspects of the proposed housing supply which are unjustified or inconsistent with National Policy. The plan should be meeting local housing needs in full and have a higher supply buffer. Need to undertake a Green Belt Review and identify additional sites to meet the proposed housing requirement under Policy S6 (Barratt David Wilson – Eastern Counties (BDW) PSQ25-6027)
- The delivery of Growth Site 17a is expected to be achieved during 2028/29 (Year 5 of the Housing Site trajectory) or more conservatively during 2029/30 (Year 6) rather than during 2030-2034 (Chelmsford Diocese Board of Finance PSQ25-717)
- Support the Development Trajectory including the growth assumptions for SGS16a which addresses NPPF para 69 (Wates Developments and Hammonds Estates LLP PS25-317, PS25-343)
- The Council has maintained strong results against the housing delivery test and a five-year housing land supply (Wates Developments and Hammonds Estates LLP PS25-317, PS25-343)
- Delivery of SGS16a from year 6 of the plan onwards and 3,000 dwellings by 2041 is supported by the evidence in the submitted Infrastructure Delivery Plan and could begin delivering residential within the first five years of the plan by incorporating an additional development parcel at Sandford Mill Lane. The site masterplan is programmed immediately after reviewed Local Plan adoption in 2026 but could be earlier. The Master Developer model will support multiple concurrent delivery outlets and different housing tenures will allow a wider range of partners to fund and deliver development which could enable the average timeframe within the Lichfields Start to Finish Report (Third Edition dated March 2024) to be improved (Wates Developments and Hammonds Estates LLP PS25-343)
- The plan is not unduly reliant on large scale garden community developments (SGS6 and 16a will deliver less than half of Chelmsford's total housing supply) and is supported by a wide range of sites at other scales (Wates Developments and Hammonds Estates LLP, PS25-313, PS25-343)
- Unclear how the trajectories identified have been defined, whether these are realistic and if the 5-year supply of sites are deliverable. There is a risk of over-reliance on sites which are not deliverable during the next 5-years. There are various instances where allocations forecast to deliver in the first 5 years carried-forward from the adopted plan have not done so including North East Chelmsford and South Woodham Ferrers. More smaller to medium sites will be needed in the short-term (Martin Grant Homes PSQ25-2613)
- Various allocations in the trajectory of the adopted Local Plan have already slipped against the expectations of that plan and not started to deliver housing, including North East Chelmsford and Great Leighs. The Housing Trajectory (April 2024) confirms that an average of only 883 dwellings per year were completed during the period 2013/14 to 2023/24, approximately 8% below expectations. Allocate an additional site (Dandara Eastern PSQ25-6210)

- Para C.2 - The Five-Year Housing Land Supply position will deteriorate during the late-2020's and into the early-2030's. This is due to the over-reliance upon the optimistic delivery rate of new homes at the Hammonds Farm given the site preparation works and new or substantial infrastructure provision that will be necessary before any built development can commence. An immediate Green Belt Review is required to identify additional sites (W. D. Smith & Son PSQ25-6021, PSQ25-6022)
- Question the allocation of Hammonds Farm – it will only deliver housing during the middle of the plan period potentially creating a gap in housing delivery to 2041 and has unrealistic delivery rates as supported by 'Start to Finish' research from Lichfields (Dandara Eastern PSQ25-6210).

CCC Response
The standards for open space requirements are supported and justified by the Open Space Assessment 2024. They have also been subject to viability testing and are deliverable.
The Housing Trajectory in the Pre-Submission Local Plan and timings within it are established through the Council's Five-Year Housing Land Supply Methodology (April 2024). The Trajectory is updated annually, and the Pre-Submission Local Plan uses the latest available Housing Site Schedule (April 2024). Minor modifications will be proposed to the Trajectory to reflect the latest published Housing Site Schedule ahead of submission (April 2026). A number of Strategic Growth Sites rolled forward from the adopted Local Plan including greenfield sites have planning permission or resolutions to grant planning permission including North of South Woodham Ferrers, North of Broomfield and North East Chelmsford.
The windfall allowance is supported by the Housing Windfall Assessment April 2024 and 2025. Para 75 of the NPPF (December 2024) allows local planning authorities to make an allowance for windfall sites. Windfall development comprises sites that have unexpectedly become available over time, and which were not anticipated by the council as part of a Local Plan. These sites are granted planning permission in accordance with adopted local and national policies and contribute towards housing figures.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process; and can meet its development requirements without needing to undertake a Green Belt review. This approach accords with National Planning Guidance.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.

APPENDIX 1

Organisations consulted and copies of key consultation materials

List of organisations consulted	204
Statement of Representation	209
Notification letter – Example	218
Notification e-mail – Example	222
Website – Local Plan Page	226
Website – Consultation Page	253
Consultation Portal – Screen Shots	256
Consultation Portal Guidance Notes	257
Paper Response Form	263
Pop-Up Stands	270
Exhibition Panels	271
Local Plan Video	283
Essex Chronicle Advert	284
Covering Letter and Local Plan Poster	285
Site Notices – Examples	287
Staff Email Banner and Website Banner	288
Local Plan Newsletter	289
Parish and Town Council Information Pack	293
Frequently Asked Questions	310
Communications & Marketing Campaign Report:	319

- City Times and South Woodham Focus Articles
- City Life Articles
- Examples of Social Media Posts
- GovDelivery Mailshots
- Bus Stop Adverts

List of organisations consulted

The Council notified more than 6,200 contacts registered on its Consultation Portal.

This included the specific and general contacts listed below, and members of the public who are not listed.

1st Chelmsford Scouts
A Dunn & Son
Abbess, Beauchamp & Berners Roding Parish Council
Abellio Greater Anglia
Accord Energy Limited
Active Travel England
Active Workspace Ltd
Agency of Architecture
Aggregate Industries UK Ltd
Aldi Stores
Alistair Stewart
Anchor Housing
Andrew Wing
Angel Stores
Anglia Ruskin University
Anglian Water Services Ltd
Arriva The Shires and Essex
Atkins Telecom
Aviva
Baddow Hall Junior School
BAE Systems
Bakers Lane Action Group
Bang and Olufsen
Barking & Dagenham CCG
Barnes Farm Infant & Junior School
Barnston Parish Council
Barton Willmore
Basildon & Brentwood CCG
Basildon Borough Council
BBC Essex
BDP
Beaulieu Residents
Becket Keys C of E Secondary School
Bennetts BMW Specialists
Billericay Town Council
Bishops Primary School
Black Notley Parish Council
Blackmore, Hook End & Wyatts Green Parish Council
Boreham Bowling Club
Boreham Conservation Society
Boreham Parish Council
Boreham Primary School
Boxford (Suffolk) Holdings Ltd
Bradwell Power Generation Company Limited
Braintree District Council
Brentwood and Chelmsford Green Party
Brentwood Borough Council
Bressole Limited
Broomfield Neighbourhood Plan Steering Group
Broomfield Parish Council
Broomfield Parish Council, Chignal Parish Council, Great Waltham Parish Council, Little Waltham Parish Council, Writtle Parish Council and Newlands Spring Residents Association
Broomfield Primary School
Broxbourne Council
BT National Notice Handling Centre
BT Openreach, Southend ATE
Building Research Establishment
CAAG
Cadent Gas
Campaign for Real Ale Limited
Campaign to Protect Rural Essex
CAODS (Chelmsford Amateur Operatic & Dramatic Society)
Capital & Counties (Financial Services) Ltd
Carter Jonas
Castle Point & Rochford CCG
Castle Point Council Centrica
Barry/ Generation/ KL/ PB/ RPS
CERA (Chignal Estate Residents Association
Chancellor Park Primary School
Channels Residents Community Group
Chelmer & Blackwater Navigation Co Ltd
Chelmer Canal Trust
Chelmer Cycles
Chelmer Cycling Club
Chelmer Housing Partnership
Chelmer Residents Forum
Chelmer Valley High School
Chelmer Valley Landscape Group
Chelmer Village Parish Council
Chelmsford and District Model Railway Club
Chelmsford Biodiversity Forum
Chelmsford Business Board
Chelmsford Canoe Club
Chelmsford Cathedral
Chelmsford City Centre Retailers Group
Chelmsford City Council
Chelmsford City Football Club
Chelmsford Civic Society
Chelmsford College
Chelmsford Community Church
Chelmsford Community Transport Limited
Chelmsford Commuters & Rail Travellers
Chelmsford County High Schools for Girls
Chelmsford CVS
Chelmsford Cycle Action Group
Chelmsford Diocese Board of Finance
Chelmsford Garden Community Council
Chelmsford Gospel Hall Trust
Chelmsford Gym Club
Chelmsford Hindu Society
Chelmsford Labour Party
Chelmsford Liberal Democrats
Chelmsford Liberal Party
Chelmsford Mencap
Chelmsford Rivers and Canal Link group (CRACL)

Chelmsford Rugby Football Club
Chelmsford Social Club
Chelmsford Star Co-operative Society Ltd
Chelmsford Taxi Association Limited
Chelmsford Theatre Workshop
CHESS
Chignal Estate Residents Association
Chignal Parish Council
Chris Marten Architectural Services
Christian Care
Christian Growth Centre Chelmsford
Church of Our Lady Immaculate
Clark Partnership
Clearview Relocation
Coal Pension Properties Ltd
Colchester City Council
Cold Norton Parish Council
Colliers
Collingwood Primary
Colt Technology Services
Columbus School & College
Company of Proprietors of the Chelmer & Blackwater Navigation Ltd
Confederation of Passenger Transport UK
Connexions & Careers Chelmsford
Cool Heat Services
Corona Energy Retail 4 Ltd
Countryside Properties
CPRE Essex
Craintern Ltd
Crest Nicholson
Crouch Vale Brewery Ltd
Croudace Homes
Crown Energy Ltd
Culture Chelmsford
Cycling UK
D.W.S Bodyworks Ltd
Danbury Mission
Danbury Neighbourhood Plan Steering Group
Danbury Parish Council
Danbury Park Community Primary School
Danbury Society
Data Energy Management Services Ltd
Defence Infrastructure Organisation (DIO)
Department for Business and Trade
Department for Education
Department for Energy Security and Net Zero
Department for Science, Innovation and Technology
Department for Transport (DfT)
Design Council
detoxpeople ltd
DevPlan UK
Diageo Pension Trust Ltd
Diocese of Chelmsford
Dominvs Group
Downes Planning Partnership
Downham CE (VC) Primary School
Downham Village Hall Committee
DTI
DWS Bodyworks
E.ON UK Plc
E2V Technologies
East Anglia GREEN
East Hanningfield Parish Council
East Hanningfield School
East Herts District Council
East of England Ambulance Service NHS Trust
East Thames Housing
Eastlight Homes
Ecotricity
EDF Energy
Education & Skills Funding Agency
EE
Elim Christian Centre
Elm Green Preparatory School
Elmwood Primary School
Energy Environment and Sustainability Group
English Rural Housing Association
ENI UK Ltd
Environment Agency
Environmental Dimension Partnership (EDP)
Epping Forest District Council
esperance energies
Essex & Suffolk Water
Essex ARG
Essex Association of Local Councils
Essex Audi Automotive Group
Essex Bridleways Association
Essex Chamber of Commerce
Essex Chronicle
Essex County Council
Essex County Fire and Rescue Service
Essex Herts Air Ambulance Trust
Essex Islamic Trust
Essex Local Access Forum
Essex Local Nature Partnership
Essex Muslim Centre
Essex Police
Essex Police Fire and Crime Commissioner
Essex Record Office
Essex Respite and Care Association
Essex Squash & Racketball Association
Essex Waterways Ltd
Essex Wildlife Trust
Estuary Housing Association
Exolum Pipeline System Ltd
Eyott Sailing Club
Falcon Bowling and Social Club
Farleigh Hospice
Felsted Parish Council
First Buses
Flagship Housing Group Ltd
Flaternity Residents association
Flitch Green Parish Council
Football Association
Ford End Church of England Primary School
Ford End Village Design Statement Committee
Forestry Commission England
Friends, Families and Travellers and Traveller Law Reform Project
Galleywood Equestrian Centre
Galleywood Infant School
Galleywood Parish Council
GB Partnerships
Great Baddow High School
Gladman Developments Ltd
Going Places Leisure Travel Ltd

Good Easter Parish Council
Good Easter Village Hall
Great & Little Leighs Parish Council
Great Baddow County Primary School
Great Baddow High School
Great Baddow Lawn Tennis Club
Great Baddow Parish Council
Great Baddow St Mary
Great Notley Parish Council
Great Waltham C of E (VC) Primary School
Great Waltham Parish Council
Greater London Authority
Green Planning Studio Ltd
Greenfields Community Housing Ltd
Greenwood Estates Ltd
Greenwoods Hotel and Spa Group
H M Prison Service
H R Philpot & Son (Gt Hayes) Ltd
Halliday West Surveyors
Hamilton Bentley & Partners
Hanson Aggregates Ltd & Threadneedle Pensions Ltd
Harlow District Council
Hastoe Housing Association
Hatfield Peverel Parish Council
Havering CCG
Havering London Borough
Heads 2 Minds
Health and Safety Executive
Heart of Essex Local Enterprise Partnership
Heathcote School
Hedingham and Chambers
Help The Aged
Heritage Writtle
Hertfordshire and West Essex ICB
Hertfordshire County Council
HEVF Self Storage UK Limited
High Chelmer
High Easter Parish Council
High Ongar Parish Council
Highways England
Highwood County Primary School
Highwood Parish Council
Hill
Historic England
Home Builders Federation
Homes England
House Of Commons
Housebuilders Consortium
Howe Green Community Association
Hullbridge Parish Council
Hylands School
Ideas Hub
Independence Project
Ingatestone & Fryerning Parish Council
Ingatestone Village Design Statement
Ingleton Wood (Billericay)
Intergen
J & A Lyon
J Matthews Trust
J. Aron & Company
Jacobs UK Limited
JCN Associates Ltd
JLL
JWF Hughes Mid-Essex Gravel + MJ Peters
Keeble Brothers
King Edward Grammar School
Kings Hardware Ltd
Kings Road Primary School
Kings Road/North Avenue Community Action Group
KLW Planning
KM Consulting
Knight Developments Ltd
L Q Group
L&Q
Landgage Heritage
Landscape Planning Group Ltd
Langford and Ulting Parish Council
Larkrise Primary School
Larmar Engineering
Latimer Homes
Lawford Mead Primary & Nursery School
LawnsActionGroup
Lewis & Scott Retirement Living
Life Education Trust
Little Baddow History Centre
Little Baddow Parish Council
Little Baddow Society
Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group
Little Dunmow Parish Council
Little Waltham C E V A Primary School
Little Waltham Parish Council
Lodge Coaches
London Borough of Barking and Dagenham
London Borough of Enfield
London Borough of Redbridge
London Borough of Waltham Forest
London Gypsies and Travellers Unit
Longfield Solar Farm
Lower Thames Crossing
M Scott Properties Ltd
Maldon District Council
Maltese Road Primary School
Mansfield Monk Limited
Marconi Plaza Residents Association
Margaret Roding Parish Council
Margaretting CE (VC) Primary School
Margaretting Parish Council
Marine Management Organisation (MMO) HM Government
Mashbury Parish Council
Master Designs Essex
McDonald's Restaurants
Meadgate Primary School
Meadows Shopping Centre
Medical Services Danbury Ltd
MHCLG
Mid and South Essex Integrated Care Board (ICB)
Mid Essex Gravel Pits (Chelmsford) Ltd
Mid Essex Hospital Services NHS Trust
Mid Essex Primary Care Trust
Mid-Essex Business Group
Mildmay Infant and Nursery School
Miscoe Enterprises Ltd
Moat Homes
Mobile Broadband Network Limited
Mobile Uk
Montagu Evans

Moulsham High School
Moulsham Infant School
Moulsham Junior School
Moulsham Mill Partnership
Mountnessing Village Council
N Clark Welding & Fabrication
Nabbotts County Infants School
National Federation of Gypsy Liaison Groups
National Gas Transmission System
National Grid
National Grid Electricity Transmission
National Highways
National Trust
Natural England
Neos Networks
Network Rail
New Hall Properties (Eastern) Ltd
New Hall School
Newlands Spring Primary School Academy Trust
Newlands Spring Residents Association
NGB Essex Angling
NGB Essex Athletics
NGB Essex Basketball
NGB Essex Boccia
NGB Essex Bowls
NGB Essex Cricket
NGB Essex Cycling
NGB Essex Fencing
NGB Essex Football
NGB Essex Gymnastics
NGB Essex Hockey
NGB Essex Lacrosse
NGB Essex Movement and Dance
NGB Essex Orienteering
NGB Essex Rowing
NGB Essex Rugby Union
NGB Essex Sailing
NGB Essex Squash
NGB Essex Triathlon
NGB Essex Volleyball
NHS England East
NHS Improvement Team
NHS North East London
NHS Property Services Ltd
NHS South East and South West Essex
NHS Suffolk and North East Essex ICB
NIBS Buses
NJB Hotels and Leisure Property
North Central London CCG
North Chelmsford Villages Community Group
North Essex Partnership NHS Foundation Trust
North Fambridge Parish Council
North West Parishes Group
Northern Trust
Oaklands Infants School
Office of Rail Regulation
Our Lady Immaculate R C Primary School
Paper Mill Lock Cruises Ltd
Parkway and Town Centre Neighbourhood Action Panel
Parkwood Academy
Perryfields County Infants School
Perryfields Junior School
PKC Retail Ltd
Planware Ltd
Pleshey Parish Council
Premier Homes
Princes Rd Allotment Association
Priory Primary School
PRS
Ptarmigan Land
Purleigh Parish Council
R Kemball
Ramblers Essex Area
Ramsden Bellhouse Parish Council
Ramsden Crays Parish Council
Rawreth Parish Council
Rayleigh Town Council
Rayne Parish Council
RCCE
Redbridge CCG
Redrow Homes
Rentplus
Reprohouse Limited
Resting Places Limited
Retail Focus
Rettendon Common Residents Association
Rettendon Parish Council
Rettendon Primary School
Richborough Estates
River Crouch Conservation Trust
Road Haulage Association
Robert Brett & Sons Ltd
Robert Dewer Associates
Rochford District Council
Rolfe-Judd
Roxwell CoE (VC) Primary School
Roxwell Parish Council
Royal Mail Group
Royal Society For Protection of Birds
RSPCA
Rugby Football Union
Runwell Parish Council
Rural Community Council of Essex
Ruston Planning Limited
S B Papineni
Sainsbury's Supermarkets Ltd
Sandon Parish Council
Sandon School
Save Sandford Mill Campaign
Scott Brownrigg
Scottish & Southern Energy Pipelines
Shirley Smith & Co
Shotgate Parish Council
Showmens Guild GB
Sky Telecommunication Services Ltd
Smithbrights Butchers
Smiths Environmental Products Ltd
South East LEP
South Hanningfield Parish Council
South Woodham Action Group
South Woodham Ferrers Health & Social Care Group
South Woodham Ferrers Residents Party
South Woodham Ferrers Town Council
Southend Borough Council
Southern Electric
SP Power Systems
Sport England
Springboard Housing Association ltd

Springfield Parish Council
Springfield Park Baptist Church
Springfield Primary School
SSA Planning
SSE Pipelines Ltd
St Anne's Preparatory School
St Augustine's Catholic Church
St Cedd's School
St John Payne Catholic School
St John's C of E Primary School
St Joseph's Catholic Primary School
St Mary's CE Primary School
St Mary's Church Great Baddow
St Peters Primary School
St Pius X Catholic Primary School
St. Michael's Junior School
Standard Life Investments
Stanfords
Stephenson's of Essex Ltd
Stevens VW Dismantlers
Stock CE Primary School
Stock Parish Council
Stow Maries Parish Council
Suffolk County Council
Swan Housing Association
Swifts Local Network: Swifts & Planning Group
Talyor Wimpey East London
Tan Stand Tanning Centre
Telecom Plus PLC
Tendring District Council
Terling and Fairstead Parish Council
Tetlow King Planning
The Beaulieu Park School
The Boswells School
The Cathedral School
The Chelmsford Ballet Company
The Chelmsford Labour Party
The Chelmsford Society
The Essex Badger Protection Group
The Inland Waterways Association (Chelmsford Branch)
The John Bishop Partnership
The JTS Partnership
The Land Trust
The Landscape Conservation Trust
The National Federation of Gypsy Liaison Groups
The Newspaper Society
The Planning Bureau
The Royal Horticultural Society
The Sandon School
The Showmen's Guild of Great Britain
The Tyrells Primary School
The Wilderness Foundation UK
The Woodland Trust
The Writtle Surgery
Theatres Trust
Threadneedle Pensions Ltd
Three
Thrift Farm Ltd
Thriftwood School
Thurrock Borough Council
Timpsons
TMA Chartered Surveyors
Total Energies Gas and Power Services UK Ltd
Toveglen Ltd
Transition Chelmsford
Transport East
Transport for London
Traveller Law Reform Project
Travelling Showmans Guild
Trinity Road Primary School
Trinity St Mary's CE (VA) Primary School
Trustees of the Fulbournes Settlement
Tyrells School
UK Power Networks
Uttlesford District Council
Valco UK Ltd
Virgin Media Services
Vitol Gas Ltd
Vodafone and O2
W & H Marriage & Sons Ltd
Waitrose Ltd
Wardrop & Co Ltd
Waterhouse Farm Residents Association
WEA Sec
Welsted Joinery Ltd
West Hanningfield Parish Council
West Register (Realisations) Ltd
Westlands CP School
WH Marriage & Sons Ltd
Wickford Town Council
Widford Lodge Preparatory School
William de Ferrers School
Willingale Parish Council
Wilson Construction Ltd
WM Morrison Supermarket Plc
Women’s Institute
Woodham Ferrers & Bicknacre Parish Council
Woodham Infrastructure Group
Woodham Mortimer with Hazeleigh Parish Council
Woodham Walter Parish Council
Woodland Trust
Woodville Primary School
Writtle Infant School
Writtle Junior School
Writtle Neighbourhood Plan Group
Writtle Parish Council
Writtle Surgery
Writtle University College
Writtle VDS
YMCA

REVIEW OF THE LOCAL PLAN
PRE-SUBMISSION (REGULATION 19) STATEMENT OF REPRESENTATION PROCEDURE AND STATEMENT ON AVAILABILITY OF PROPOSED SUBMISSION DOCUMENTS FOR INSPECTION

Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) - Regulations 7, 19, 20 and 35

Chelmsford City Council is inviting your comments on the following documents:

- Chelmsford Local Plan – Pre-Submission (Regulation 19) Document
- Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment
- Co-Living Housing Planning Advice Note
- Consultation Draft Planning Obligations Supplementary Planning Document.

The City Council is publishing the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document for consultation from 4 February to 18 March 2025. It is accompanied by the Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment. This is in accordance with Regulations 19 and 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The Local Plan shapes future growth and development across the whole of Chelmsford City Council's area. It sets out a positive vision, identifies where and how new development should take place in the future as well as areas for protection. It includes strategic policies, site allocation policies, development management policies and a Policies Map for determining all forms of planning applications. We adopted our current Local Plan in May 2020. We need to review the plan at least every five years to make sure it remains up to date and meets the changing needs for development growth to 2041.

The Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment comprises a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), Habitats Regulations Assessment (HRA), Health Impact Assessment (HIA) and Equality Impact Assessment (EqIA).

In addition, the Council is also consulting on a Co-Living Housing Planning Advice Note. The Planning Advice Note seeks to provide practical guidance to potential promoters or developers of co-living housing in Chelmsford, to ensure they meet the Council's expectation in this regard.

The Consultation Draft Planning Obligations Supplementary Planning Document (SPD) is also being consulted on. This sets out how the Council will seek planning obligations when considering planning applications. The adopted SPD was published in January 2021 and has been updated to reflect proposed changes in the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document, as well as changes in national planning policy. It refers to the latest published Infrastructure Delivery Plan and integrates and updates some published Planning Advice Notes.

This note has nine parts:

- PART 1 – What is a Regulation 19 Consultation
- PART 2 – Legal Compliance and Duty to Co-operate
- PART 3 – Soundness
- PART 4 – Where can I view the consultation documents?
- PART 5 – How can I comment?
- PART 6 – Appearing at Independent Examination
- PART 7 – What will happen with my representation?
- PART 8 – Statement on availability of proposed submission documents for inspection
- PART 9 – Other consultations

The consultation period runs from 10am on 4 February 2025 until 4pm on 18 March 2025 Comments received before or after this time cannot be accepted.

PART 1 – What is a Regulation 19 Consultation

As a Local Planning Authority, the Council must publish the version of the Local Plan that it intends to submit to the Planning Inspectorate for Independent Examination. This allows for representations to be made which can be considered at Independent Examination. This is known as the publication stage, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended www.legislation.gov.uk/uksi/2012/767/contents. For Chelmsford, this is the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document (the 'Plan').

The Planning Inspector undertaking the Independent Examination will assess whether the Local Plan has been prepared in line with the relevant legal requirements (including the duty to co-operate) and whether it is 'sound'.

PART 2 – Legal Compliance and Duty to Co-operate

You should consider the following before making a representation on legal compliance:

- The Plan should be included in the Council's current Local Development Scheme (LDS) and the key stages set out in the LDS should have been followed. The LDS is effectively a programme of work prepared by the Council, setting out the plans it proposes to produce. It will set out the key stages in the production of any Plans which the LPA proposes to bring forward for Independent Examination. If the Plan is not in the current LDS it should not have been published for representations. The Council's LDS is available to view on its website at:www.chelmsford.gov.uk/media/ew4mbrsr/chelmsford-local-development-scheme-2023-2028.pdf
- The process of community involvement for the Plan in question should be in general accordance with the Council's Statement of Community Involvement (SCI). The SCI sets out the Council's strategy for involving the community in the preparation and revision of plans and the consideration of planning applications. The Council's SCI is available to view on its website at: www.chelmsford.gov.uk/sci
- The Council is required to provide a Sustainability Appraisal (SA) report when it publishes a Plan. This should identify the process by which the SA has been carried out, and the baseline information used to inform the process and the outcomes of that process. The SA

is a tool for assessing the extent to which the Plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The SA for this Plan is included within the published Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment.

- The Plan should comply with all other relevant requirements of the Planning and Compulsory Purchase Act (PCPA) and the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.

You should consider the following before making a representation on compliance with the duty to co-operate:

- Section 33A of the PCPA requires the Council to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the Plan. The Council's Duty to Co-operate Position Statement (December 2024) provides an update on the activities undertaken by Chelmsford City Council (CCC) in respect to the Duty to Co-operate on the Review of the adopted Chelmsford Local Plan, and is available to view on the Council's website at: https://www.chelmsford.gov.uk/media/g2pn5tmg/dtc002-duty-to-cooperate-position-statement-december-2024.pdf
- Non-compliance with the duty to co-operate cannot be rectified after the submission of the plan. Therefore, the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector cannot recommend adoption of the Plan.

PART 3 – Soundness

A Local Planning Authority should submit a Plan for Independent Examination which it considers to be "sound". The tests of soundness are set out in the National Planning Policy Framework (NPPF). Plans are sound if they are:

Positively prepared – providing a strategy which, as a minimum seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

Effective – deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF. Please note that in accordance with paragraph 234 of the 2024 NPPF, for the purpose of preparing local plans this Plan will be examined under the 2023 NPPF.

Representations made by you at this stage should focus on whether the plan meets the tests listed above. This is because these are the broad areas that the Inspector will focus on in examining the Local Plan.

If you think the content of the Local Plan is not sound because it does not include a policy on a particular issue, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy?
- Is the issue with which you are concerned already covered by another policy in the Local Plan?
- If the policy is not covered elsewhere, in what way is the Local Plan unsound without the policy?
- If the Local Plan is unsound without the policy, what should the policy say?

PART 4 - Where can I view the consultation documents?

You can read the consultation documents in the following ways:

- On the Council's Consultation Portal at www.chelmsford.gov.uk/planningpolicyconsult. This system also allows you to submit comments to the consultations
- On the Council's website alongside the Local Plan evidence base documents at www.chelmsford.gov.uk/lp-review
- At the Chelmsford City Council Customer Service Centre, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford CM1 1JE (10am to 4pm Monday to Friday).

At the following drop-in public exhibitions. These will provide an opportunity to meet an officer face-to-face unless otherwise stated.

Location	Date	Time
Council Chamber, Civic Centre, Duke Street, Chelmsford, CM1 1JE	Thursday 27 February Friday 28 February Saturday 1 March	6pm - 8pm 2pm - 4pm 10am - 12noon
High Chelmer Shopping Centre, Exchange Way, Chelmsford, CM1 1XB	Monday 24 February to Sunday 2 March	Unstaffed exhibition panels displayed all-day during shopping centre opening hours
South Woodham Town Council, Champions Manor Hall, Hullbridge Road, South Woodham Ferrers, CM3 5LJ	Thursday 13 February to Tuesday 25 February	Unstaffed exhibition panels displayed 9am - 4pm (except weekends)

Please check our website www.chelmsford.gov.uk/lp-review for any updates before making your journey.

If you are unable to access the documents on a computer, you can request paper copies by emailing planning.policy@chelmsford.gov.uk, telephoning (01245) 606330 or by writing to Spatial Planning Services, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE. A charge will be made to cover printing and postage costs.

PART 5 - How can I comment?

You can comment on the consultation documents in the following ways:

Online Consultation Portal:
Go to: www.chelmsford.gov.uk/planningpolicyconsult where you can:

- Read the consultation documents
- Make your comments via the specially designed representation form
- Sign up for alerts to feedback reports and future consultations

This is our preferred means of receiving comments as it ensures that your comments are recorded accurately and are processed quickly.

It also allows you to edit comments before submitting them, save a draft and return to your form later, and to upload any supporting material. Please **save** your comments as you complete the form using the 'Save as Draft' button at the bottom of the form as the system will timeout after 30 minutes.

You can view, download, and comment on all the consultations via the online Consultation Portal: www.chelmsford.gov.uk/planningpolicyconsult

If you have not already registered, registration is simple using the easy to follow steps in our User Guide: www.chelmsford.gov.uk/lp-portal-guide. These guidance notes include more information on the Consultation Portal, including what to do if you have forgotten your password, and how to make your comments. If you have followed the user guide and have any further questions or are having difficulties using the Consultation Portal please contact us at planning.policy@chelmsford.gov.uk or call 01245 606330 during normal office hours and one of the team can assist you.

Please note you will need to add your comments through the representation form for each paragraph, policy, map, table, figure or appendix etc. you wish to comment on. Full guidance on how to make your comments are included within our User Guide: www.chelmsford.gov.uk/lp-portal-guide

The events on the Consultation Portal are as follows:

1. Local Plan Regulation 19 Pre-Submission Consultation 2025 – Use this event if you want to make comments on multiple policies/paragraphs/maps etc of the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document. You can read and make your comments on each part of the document as you go through it using the representation form.

2. Local Plan Regulation 19 Pre-Submission Consultation Questionnaire 2025 – Here you can read the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document as a pdf and then make comments on individual policies/paragraphs/maps etc. You will need to complete this representation form multiple times if you wish to make comments on multiple parts of the document. Each time you complete it you must state which policy/paragraph/map etc of the document your comments relate to.

3. Local Plan Regulation 19 Pre-Submission Integrated Impact Assessment 2025 – Here you can read the Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment (IIA) as a pdf and then make comments on individual paragraphs/figures/tables of the document. You will need to complete this representation form multiple times if you wish to make comments on multiple parts of the IIA. Each time you complete it you must state which paragraph/figure/tables etc of the IIA your comments relate to.

4. Co-Living Housing Planning Advice Note Consultation – Here you can read the document as a pdf and then make comments on individual paragraphs/figures/tables of the Advice Note. You will need to complete this representation form multiple times if you wish to make comments on multiple parts of the Advice Note. Each time you complete it you must state which paragraph/figure/tables etc of the Advice Note your comments relate to.

5. Consultation Draft Planning Obligations Supplementary Planning Document – Here you can read the document as a pdf and then make comments on individual paragraphs/figures/tables of the Planning Obligations Supplementary Planning Document (SPD). You will need to complete this representation form multiple times if you wish to make comments on multiple parts of the SPD. Each time you complete it you must state which paragraph/figure/tables etc of the SPD your comments relate to.

Representations are invited for a period of six weeks, up to 4pm on 18 March 2025. Comments received outside of this period will not be accepted. The Council is unable to make exceptions or allowances for postal delays or external problems with electronic communications. So please try to reply well ahead of the final deadline.

For all the above events please remember to save your comments as you go.

In writing:
If you prefer to send comments in writing, please fill in the relevant specially designed representation forms for each consultation event.

We will then record your comments on the Consultation Portal, to make sure they are dealt with alongside the online comments.

Local Plan representation forms cover the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document and the Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment consultations.

The Local Plan representation forms can be downloaded at www.chelmsford.gov.uk/lp-review. Paper copies of these representation forms for are also available from Chelmsford City Council's Customer Service Centre, Civic Centre, Duke Street, Chelmsford, CM1 1JE (10am to 4pm Monday to Friday). Paper copies can also be made available on request by telephoning (01245) 606330 or emailing planning.policy@chelmsford.gov.uk

Forms can be returned:

- By e-mail to planning.policy@chelmsford.gov.uk
- By post to Planning Policy, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE
- By hand to Chelmsford City Council Customer Service Centre (details above).

The use of the Local Plan representation forms is strongly recommended as this will ensure that comments are related to the matters relevant to the subsequent Independent Examination by a Planning Inspector.

If you wish to submit a representation on more than one issue in the Local Plan, please complete a Local Plan representation form continuation sheet as provided for each issue.

If you have difficulties making representations by e-mail or post due to a disability, please call 01245 606330. Documents can be made available in alternative format including large print, audio and other languages. Please call (01245) 606330, or email planning.policy@chelmsford.gov.uk

Please do not submit multiple copies of the same response (e.g. online and email, or online and hardcopy).

General advice on making representations on the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document:

If you wish to make a representation seeking a modification to the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document (the 'Plan') or part of the Plan you should set out clearly in what way you consider the Plan or part of the Plan is legally non-compliant or unsound, having regard to the soundness criteria set out above in Part 3. Your representation should be supported by evidence wherever possible. It will be helpful if you also say succinctly and precisely how you think the plan should be modified.

You should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification. If you are submitting a representation of significant length, please provide a summary of not more than 200 words. We will request a summary in appropriate circumstances if it is not originally provided. You should not assume that you will have a further opportunity to make submissions. Any further submissions after the Plan has been submitted for Independent Examination may only be made if invited by the Inspector, based on the matters and issues they identify.

The Planning Inspectorate advise that where groups or individuals share a common view on the plan, it would be very helpful if they would make a single representation which represents that view, rather than a large number of separate representations repeating the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

If you are organising a petition or intend to, or have signed one, it must be submitted by 4pm on 18 March 2025 and be accompanied by the name and contact details for the petition organiser. The Council will register the petition organiser on the Consultation Portal. Acknowledgement of the petition and any future Local Plan notifications will only be sent to the petition organiser. Petitions should include the names and addresses of all who support the petition. The number of signatories will be recorded and attributed to relevant representations, but names, addresses and signatures themselves will not be published.

Please consider carefully how you would like your representation to be dealt with in the Independent Examination: whether you are content to rely on your written representation, or whether you wish to take part in hearing session(s). Please remember only representors who are seeking a change to the Plan can be heard at the hearing session(s), and it is the Planning Inspector's decision on who will participate and be heard at the Independent Examination. In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the Independent Examination process.

Representations about the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document (the 'Plan') may be accompanied by a request to be notified at a specified address of any of the following:

i. The submission of the Plan to the Secretary of State Secretary of State for Levelling Up, Housing and Communities for Independent Examination
ii. Publication of the Planning Inspector's Report on the Plan
iii. Adoption of the Local Plan 2022- 2041

These requests can be made by completing the relevant section of the Local Plan representation form.

General advice on making representations to all consultation events:

If you are uploading additional supporting documents, please ensure they contain no signatures, e-mail addresses or personal postal addresses.

Please note we are unable to accept anonymous representations. It is a requirement of the Local Plan process that comments can only be deemed legitimate ("duly made") if they are received in a written format with a name and address supplied. Comments made verbally, anonymously, or outside of the consultation period cannot be accepted.

Section 149 of the Equality Act 2010 requires that the Council should avoid any form of discrimination and foster good relations between different ethnic groups. Comments which are deemed to be discriminatory, racist, inflammatory or derogatory, or include information which

comprises personal or sensitive information e.g. health information, details about a criminal record, or religious beliefs, will not be accepted. We would ask that you avoid the use of such comments when making your representations.

PART 6 - Appearing at Independent Examination

The Local Plan representation form asks whether you consider it necessary to take part and speak at the Independent Examination hearing if your representation is seeking a modification to the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document (the 'Plan'). Please remember it is the Planning Inspector's decision on who will participate and be heard at the Independent Examination. It is acceptable to submit just a written submission if you feel this adequately covers all your points as all the representations will be submitted to the Planning Inspector and considered as part of the Independent Examination.

There will be no examination of the Consultation Draft Planning Obligations Supplementary Planning Document, or the Co-Living Planning Advice Note.

PART 7 - What will happen with my representation?

For all consultation events the Council will acknowledge receipt of all duly received representations, although the Council will not enter into individual correspondence. All representations will be recorded and published on the Consultation Portal at www.chelmsford.gov.uk/planningpolicyconsult

Comments will be published with the respondent's name, organisation and agent (where applicable). No other personal details will be made public. Data will be held in accordance with the Data Protection Act 1998 and the General Data Protection Regulations. For more information please visit the Council's Privacy Policy web page: www.chelmsford.gov.uk/your-council/about-our-website/privacy-policy-and-notices/privacy-policy/

A copy of all duly made representation(s) to the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document and Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector). These representations will be 'made available' in line with the Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20, 22 and 35). This includes publication on the Council's Consultation Portal.

Following the consultation, feedback reports will be produced setting out the main issues raised to the documents.

PART 8 – Statement on availability of proposed submission documents for inspection

The following documents are defined in Regulation 17 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) as the "proposed submission documents":

i. Chelmsford Local Plan – Pre-Submission (Regulation 19) Document and its Policies Map
ii. Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment
iii. Issues and Options You Said We Did Feedback Report
iv. Preferred Options You Said We Did Feedback Report

These documents are available for inspection in line with Part 4.

In addition to these proposed submission documents, a number of supporting evidence based documents are published to view on our website at www.chelmsford.gov.uk/lp-review

PART 9 – Other consultations

We are also consulting on two additional planning consultations as outlined below:

Co-Living Housing Planning Advice Note Consultation

Co-living housing proposals have the potential to meet a specific demand and need for housing. However, by doing so the Council needs to ensure that this does not result in sub-standard accommodation creating unacceptable living conditions for future residents. The Planning Advice Note seeks to provide practical guidance to potential promoters or developers of co-living housing in Chelmsford, to ensure they meet the Council's expectation in this regard.

Consultation Draft Planning Obligations Supplementary Planning Document

The Consultation Draft Planning Obligations Supplementary Planning Document (SPD) sets out how the Council will seek planning obligations when considering planning applications. The adopted SPD was published in January 2021 and has been updated to reflect proposed changes in the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document as well as changes in national planning policy. It refers to the latest published Infrastructure Delivery Plan and integrates and updates some published Planning Advice Notes.

How to make your comments

Both the draft Planning Advice Note and SPD will be subject to the same six-week public consultation period alongside the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document and the Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment consultations. See Part 5 above for full details about how to make your comments.

Next steps

Following the consideration of the consultation responses, the Co-Living Housing Planning Advice Note will be finalised for consideration by the Council's Cabinet in the Spring of 2025. If approved, it will then be used by the Council as a material consideration in the determination of planning applications.

Following the consultation on the Draft Planning Obligations Supplementary Planning Document, a summary of the consultation feedback and how the feedback will be addressed in the document will be reported to Chelmsford Policy Board before the document is submitted as an evidence base document supporting the Independent Examination of the Plan. The final version of the SPD is not expected to be published until the Local Plan is adopted. This will allow for any modifications made by the Inspector to be incorporated into the SPD.

Directorate for Sustainable Communities
Spatial Planning Services

Spatial Planning Services
Civic Centre, Duke Street, Chelmsford,
Essex CM1 1JE

Date: 4 February 2025
PID number: «Person_ID»
Username: «Username»

Dear Consultee,

New Consultation Events –

- **Chelmsford Local Plan – Pre-Submission (Regulation 19) Document**
- **Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment Consultation**
- **Consultation Draft Planning Obligations Supplementary Planning Document, and**
- **Co-Living Housing Planning Advice Note**

I am writing to you as you as a registered consultee on Chelmsford City Council's Local Plan consultation database.

Please be advised that the City Council is publishing the above documents for consultation for six weeks from: 10am on Tuesday 4 February 2025 to 4pm on Tuesday 18 March 2025**.**

Local Plan

The next stage in the Review of the Chelmsford Local Plan is to consult on the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document.

What is the adopted Local Plan and why are we reviewing it?
The Local Plan shapes future growth and development across Chelmsford City Council's area. It sets out a positive vision, identifies where and how new development should take place in the future as well as areas for protection. We adopted our current Local Plan in May 2020. We need to review the plan at least every five years to make sure it remains up to date and meets the changing needs for development growth to 2041. The Government revised the National Planning Policy Framework (NPPF) in December 2024 but our Local Plan is able to continue under transitional arrangements meaning it will be examined against the previous December 2023 NPPF.

What is the Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment?
The Review of the Adopted Chelmsford Local Plan: Integrated Impact Assessment assesses the sustainability, health, and equality performance of the Plan.

What are we consulting on?
Following on from previous consultations in 2022 and 2024, we are consulting on the final draft Local Plan before it is submitted for examination by a government-appointed independent Planning Inspector.

We are consulting on the:

- Chelmsford Local Plan – Pre-Submission (Regulation 19) Document
- Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment (IIA)

How do I get involved?
To ensure that comments are submitted in a format required by the Planning Inspector, it is important that you identify whether you support or object to the Pre-Submission (Regulation 19) Local Plan, whether the Council has met the legal requirements, including the Duty to Co-operate and whether it meets the tests of soundness set out in the national policy (National Planning Policy Framework). Plans are sound if they are:

- **Positively prepared** – provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common grounds; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

We prefer receiving comments online, using our specially designed Consultation Portal. Using the Consultation Portal helps us to record your comments accurately and process them quickly. Go to www.chelmsford.gov.uk/planningpolicyconsult to:

- Read the consultation documents
- Make your comments
- Sign up for alerts to future consultations.

Otherwise, representations should be made on a specially designed response form available online at www.chelmsford.gov.uk/lp-review or a paper copy can be provided by phoning (01245) 606330. **The use of the standard representation form is strongly recommended as this will ensure that comments are related to the matters relevant to the subsequent examination by a Planning Inspector.**

Responses can also be made by email and in writing.

See the enclosed Statement of Representation Procedure and Statement on Availability of Proposed Submission Documents for full details about what the documents cover and how to make your comments.

More information

- Read our newsletter which summaries the consultation (enclosed)

- Meet with planning staff face-to-face at a public drop-in exhibition (see the Statement of Representation Procedure and Statement on Availability of Proposed Submission Documents for details)
- Visit our website for further information such as the frequently asked questions www.chelmsford.gov.uk/lp-review
- Email us at planning.policy@chelmsford.gov.uk or call 01245 606330.

Next Steps
All responses will be submitted to the Planning Inspector, alongside the Pre-Submission (Regulation 19) Local Plan and evidence base. The Council will produce a summary of the main issues raised in the consultation responses for the Planning Inspector and publish this online.

All duly-made comments will be published on the Council's Consultation Portal in accordance with the Data Protection Act and General Data Protection Regulations. To be duly made, you need to provide your name and address with your comment. Anonymous comments will not be accepted.

Your name, your comments and any information provided, including supporting documents, will be available for public inspection and published online. We will not publish any personal details.

Section 149 of the Equality Act 2010 requires that the Council should avoid any form of discrimination and also foster good relations between different ethnic groups. We will not display, share or consider any comments that are inappropriate, including those that are racist, inflammatory or derogatory. Any such comments will be considered as inadmissible and will not be accepted.

Further general information on the Local Plan can be found on the Council's website at https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-local-plan/

Additional Consultations
We are also consulting on two additional planning consultations as outlined below.

Consultation Draft Planning Obligations Supplementary Planning Document

The Consultation Draft Planning Obligations Supplementary Planning Document (SPD) sets out how the Council will seek planning obligations (such as financial contributions towards site improvements) when considering planning applications. The adopted SPD was published in January 2021 and has been updated to reflect proposed changes in the Pre-Submission (Regulation 19) Local Plan as well as changes in national planning policy. It refers to the latest published Infrastructure Delivery Plan and integrates and updates some published Planning Advice Notes.

The SPD will be subject to the same six-week public consultation period alongside the Pre-Submission (Regulation 19) Local Plan. See the enclosed Statement of Representation Procedure and Statement on Availability of Proposed Submission Documents for full details about how to make your comments.

Following the consideration of the consultation responses, the final version of the SPD will be finalised for consideration by the Council's Cabinet. If approved, it can then be used by the Council as a material consideration in the determination of planning applications.

Co-Living Housing Planning Advice Note Consultation

Co-living housing is a form of communal living. It has the potential to meet a specific demand and need for housing. However, by doing so the Council needs to ensure that this does not result in sub-standard accommodation creating unacceptable living conditions for future residents. The Planning Advice Note seeks to provide practical guidance to potential promoters or developers of co-living housing in Chelmsford, to ensure they meet the Council's expectation in this regard.

The draft Planning Advice Note will be subject to the same six-week public consultation period alongside the Pre-Submission (Regulation 19) Local Plan. See the enclosed Statement of Representations Procedure and Statement on Availability of Proposed Submission Documents for full details about how to make your comments.

Following the consideration of the consultation responses, the final version of the Co-Living Housing Planning Advice Note will be finalised for consideration by the Council's Cabinet. If approved, it can then be used by the Council as a material consideration in the determination of planning applications.

Please note:

- **We are unable to accept anonymous representations**
- **Any late comments received after 4pm on Tuesday 18 March 2025 cannot be accepted**
- **Individual acknowledgement of receipt will not be possible**.

Updating your details

If you no longer wish to remain on our consultation database or if your contact details have changed, please contact us on 01245 606330.

You may prefer to submit/manage/view your comments online through the planning policy Consultation Portal. We will then keep you informed of progress of the Local Plan by email, and you can easily view and comment on consultations. It's simple to transfer to the online system - please call us on 01245 606330.

Yours faithfully,

Jeremy Potter

Spatial Planning Services Manager

PID Number: «Person_ID»
Username: «Username»

Dear Consultee

New Consultation Events –

- **Chelmsford Local Plan – Pre-Submission (Regulation 19) Document**
- **Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment Consultation**
- **Consultation Draft Planning Obligations Supplementary Planning Document, and**
- **Co-Living Housing Planning Advice Note**

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What is the Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment?
The Review of the Adopted Chelmsford Local Plan: Integrated Impact Assessment assesses the sustainability, health, and equality performance of the Plan.

What are we consulting on?
Following on from previous consultations in 2022 and 2024, we are consulting on the final draft Local Plan before it is submitted for examination by a government-appointed independent Planning Inspector.

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- Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment (IIA)

How do I get involved?
To ensure that comments are submitted in a format required by the Planning Inspector, it is important that you identify whether you support or object to the Pre-Submission (Regulation 19) Local Plan, whether the Council has met the legal requirements, including the Duty to Co-operate and whether it meets the tests of soundness set out in the national policy (National Planning Policy Framework). Plans are sound if they are:

- **Positively prepared** – provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development
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See the Statement of Representation Procedure and Statement on Availability of Proposed Submission Documents for full details about what the documents cover and how to make your comments.

More information

- Read our newsletter which summaries the consultation
- Meet with planning staff face-to-face at a public drop-in exhibition (see the Statement of Representation Procedure and Statement on Availability of Proposed Submission Documents for details)
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- Email us at planning.policy@chelmsford.gov.uk or call 01245 606330.

Next Steps
All responses will be submitted to the Planning Inspector, alongside the Pre-Submission (Regulation 19) Local Plan and evidence base. The Council will produce a summary of the main issues raised in the consultation responses for the Planning Inspector and publish this online.

All duly-made comments will be published on the Council's Consultation Portal in accordance with the Data Protection Act and General Data Protection Regulations. To be duly made, you need to provide your name and address with your comment. Anonymous comments will not be accepted.

Your name, your comments and any information provided, including supporting documents, will be available for public inspection and published online. We will not publish any personal details.

Section 149 of the Equality Act 2010 requires that the Council should avoid any form of discrimination and also foster good relations between different ethnic groups. We will not display, share or consider any comments that are inappropriate, including those that are racist, inflammatory or derogatory. Any such comments will be considered as inadmissible and will not be accepted.

Further general information on the Local Plan can be found on the Council's website at https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-local-plan/

Additional Consultations

We are also consulting on two additional planning consultations as outlined below.

Consultation Draft Planning Obligations Supplementary Planning Document

The Consultation Draft Planning Obligations Supplementary Planning Document (SPD) sets out how the Council will seek planning obligations (such as financial contributions towards site improvements) when considering planning applications. The adopted SPD was published in January 2021 and has been updated to reflect proposed changes in the Pre-Submission (Regulation 19) Local Plan as well as changes in national planning policy. It refers to the latest published Infrastructure Delivery Plan and integrates and updates some published Planning Advice Notes.

The SPD will be subject to the same six-week public consultation period alongside the Pre-Submission (Regulation 19) Local Plan. See the Statement of Representation Procedure and Statement on Availability of Proposed Submission Documents for full details about how to make your comments.

Following the consideration of the consultation responses, the final version of the SPD will be finalised for consideration by the Council's Cabinet. If approved, it can then be used by the Council as a material consideration in the determination of planning applications.

Co-Living Housing Planning Advice Note Consultation

Co-living housing is a form of communal living. It has the potential to meet a specific demand and need for housing. However, by doing so the Council needs to ensure that this does not result in sub-standard accommodation creating unacceptable living conditions for future residents. The Planning Advice Note seeks to provide practical guidance to potential promoters or developers of co-living housing in Chelmsford, to ensure they meet the Council's expectation in this regard.

The draft Planning Advice Note will be subject to the same six-week public consultation period alongside the Pre-Submission (Regulation 19) Local Plan. See the Statement of Representations Procedure and Statement on Availability of Proposed Submission Documents for full details about how to make your comments.

Following the consideration of the consultation responses, the final version of the Co-Living Housing Planning Advice Note will be finalised for consideration by the Council's Cabinet. If approved, it can then be used by the Council as a material consideration in the determination of planning applications.

Please note:

- **We are unable to accept anonymous representations**
- **Any late comments received after 4pm on Tuesday 18 March 2025 cannot be accepted**
- **Individual acknowledgement of receipt will not be possible**.

Updating your details

If you no longer wish to remain on our consultation database or if your contact details have changed please contact us on 01245 606330 or update your record at http://consult.chelmsford.gov.uk/portal

Your username is at the top of this email. If you have forgotten your login details or for other information about the Consultation Portal, please see our Guidance Notes available at: https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-local-plan/consultations-on-planning-policy/how-to-use-the-consultation-portal/

Yours faithfully

Jeremy Potter

Spatial Planning Services Manager

Chelmsford City Council

Listen

Search site Search

Local Plan: Pre-Submission Consultation

We are reviewing our adopted Local Plan, and so are consulting on the Pre-Submission stage now. The consultation closes at 4pm on Tuesday 18 March 2025.

Local Plan Review

We are reviewing our adopted Local Plan. We are currently consulting on the Chelmsford Local Plan: Pre-Submission (Regulation 19) Document. The consultation period closes on Tuesday 18 March 2025.

This is our third and final stage of public consultation on the final draft Local Plan before we submit it for Independent Examination by a government-appointed Planning Inspector.

As part of the consultation, we are also asking for views on the Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment. We are also consulting separately on two further planning documents.

This is a separate process to making comments on planning applications. You can view and comment on any current planning applications.

Pre-submission consultation stage

How to have your say

You can view the Local Plan review consultation documents on our specially designed Planning Policy consultation portal.



Also in this section

- Adopted Local Plan
- Request housing and planning policy advice
- Brownfield register
- Self-build, custom build and community-led housing

We prefer receiving comments through the consultation portal. This ensures that your comments are recorded accurately and are processed quickly. You can also download the consultation documents and sign up for consultation alerts.

You can find out more about how to use the Planning Policy consultation portal.

You can also read detailed ↓ guidance on how to make your comments on these Local Plan consultation events.

Commenting on individual planning applications

This Local Plan consultation is a separate process to making comments on a planning application. You can find out how to comment on a planning application.

Documents we are consulting on

- Call for sites, SHELAA and parish maps
- Consultations on planning policy
- Essex Coast RAMS
- Involving communities and organisations
- Livewell Development Accreditation Scheme
- Monitoring development
- Neighbourhood Plans and Village Design Statements
- Supplementary Planning Documents and planning advice notes

Chelmsford Local Plan: Pre-Submission (Regulation 19) Document

This is the main consultation document, where we include sites where new homes, jobs and other facilities will be located as well as areas for protection.

We also include updated and new policies that we will use to decide planning applications. The document also includes a Policies Map which shows where the planning policies apply.

You can click on event 1 in the consultation portal to read and make comments on the document as you go. We need you to consider whether the Pre-Submission Document is legally compliant and consistent with national policy, and answer specific consultation questions on this.

Contact Planning Policy

Contact the team online

01245 606330

Chelmsford Local Plan: Pre-Submission (Regulation 19)

Questionnaire

This is a simple questionnaire on the main consultation document. You can click on event 2 in the consultation portal if you have read the consultation document and just want to make your comments in one place.

We need you to consider whether the Pre-Submission Document is legally compliant and consistent with national policy, and answer specific consultation questions on this.

Pre-Submission Integrated Impact Assessment (IIA)

This includes environmental, habitats, quality and health assessments of the impacts of the Pre-Submission Local Plan.

You can click on event 3 in the consultation portal to view and comment on the IIA.

Co-Living Housing Planning Advice Note Consultation

This provides practical guidance to potential promoters or developers of co-living housing in Chelmsford.

You can click on event 4 in the consultation portal to view and comment on the Planning Advice Note.

Consultation Draft Planning Obligations Supplementary Planning Document (SPD)

This sets out how we will seek planning obligations such as financial contributions towards important site improvements when considering planning applications.

You can click on event 5 in the consultation portal to view and comment on the SPD.

Download the documents

You can view the Local Plan review consultation documents on our specially designed Planning Policy consultation portal.

Otherwise you can download them. These documents are large in size. You may find it easier to download and view these documents on a desktop computer, rather than on a smartphone or tablet.

- Pre Submission (Regulation 19) Local Plan Consultation Document
- Pre Submission Integrated Impact Assessment (IIA)
- Co Living Housing Planning Advice Note
- Consultation Draft Planning Obligations Supplementary Planning Document (SPD)
- Co Living Housing Planning Advice Note Equality Impact Assessment

Supporting documents

Before making your comments, we recommend you read the guidance contained in the
Pre-Submission (Regulation 19) Statement of Representation Procedure and Statement on Availability of Proposed Submission Documents for Inspection

This includes the 'Tests of Soundness' that your comments should address, including legal compliance and consistency with national policy. These are the broad areas that the Planning Inspector will focus on in examining the Local Plan.

We have published feedback reports from the earlier consultation stages:

↓ Issues and Options 'You Said We Did' Feedback Report (May 2024)

↓ Preferred Options 'You Said We Did' Feedback Report (February 2025)

You can see a list of all the adopted and allocated sites (↓ Sites at a Glance), with a note of which Policies Map section they are shown on. The Policies Maps are included at Section 11 of the ↓ Local Plan Pre-Submission Options Consultation Document.

Topic papers

We have produced several Topic Papers to set out how the review of the Local Plan has been developed. We will refresh and update them at each stage of the review process to ensure the latest information/position is available.

Topic Papers provide background information, but they do not contain any policies, proposals or site allocations. They will form part of the Local Plan evidence base which we will submit alongside the Local Plan for independent examination.

Pre Submission Topic Paper Climate Change (February 2025) ↓

Pre Submission Topic Paper Employment (February 2025) ↓

Pre Submission Topic Paper Health and Wellbeing (February 2025)

Pre Submission Topic Paper Historic Environment (February 2025)

Pre Submission Topic Paper Housing (February 2025)

Pre Submission Topic Paper Infrastructure (February 2025)

Pre Submission Topic Paper Spatial Strategy and Strategic Sites (February 2025)

Pre Submission Topic Paper Transport (February 2025)

Other ways to comment

We prefer receiving comments through the consultation portal. This ensures that your comments are recorded accurately and are processed quickly. You can also download the consultation documents and sign up for consultation alerts.

You can find out more about how to use the Planning Policy consultation portal.

If you prefer to send comments in writing, you can print and fill in the relevant specially-designed representation forms for each consultation event.

The representation forms are for the:

- ↓ Pre-Submission (Regulation 19) Document
- ↓ Continuation form for the Pre-Submission (Regulation 19) Document
- ↓ Integrated Impact Assessment
- ↓ Continuation form for the Integrated Impact Assessment
- ↓ Co-Living Planning Advice Note
- ↓ Draft Planning Obligations Supplementary Planning Document

We will then record your comments on the Consultation Portal, to make sure they are dealt with alongside the online comments.

You can collect a paper copy of these representation forms from our Customer Service Centre, or you can request one by phone on 01245 606330 or by email.

You can also make comments:

- by e-mail to planning.policy@chelmsford.gov.uk
- by post to Planning Policy, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE
- by hand at our Customer Service Centre

If you have difficulties commenting due to a disability, you can call 01245 606330. We can make documents available in alternative formats, including large print, audio and other languages, on request by phone on (01245) 606330 or by email.

How to find out more

You can:

- view our What is a Local Plan? video

- download a copy of the ↓ FAQs
- read our ↓ Pre-Submission Local Plan Newsletter
- read our ↓ Integrated Impact Assessment Newsletter
- view our ↓ exhibition panels

You can also visit one of our exhibitions in person.

We will be holding a staffed exhibition in our Council Chamber at the Civic Centre on:

- Thursday 27 February, from 6pm to 8pm
- Friday 28 February, from 2pm to 4pm
- Saturday 1 March, from 10am to 12 noon

You can also view an unstaffed exhibition at:

- the High Chelmer Shopping Centre from Monday 24 February to Sunday 2 March, between 7am and 6.30pm
- South Woodham Ferrers Town Council, Champions Manor Hall, Hullbridge Road, SWF from Thursday 13 February to

Tuesday 25 February, between 9am and 4pm (excluding weekends)

After the consultation closes

We will acknowledge receipt of all 'duly made' representations to all the consultation events, but we will not enter into individual correspondence. We will record and publish all comments on the Consultation Portal .

We will send all comments about the Chelmsford Local Plan: Pre-Submission (Regulation 19) Document, and Pre-Submission Integrated Impact Assessment (IIA), to the Planning Inspectorate for Independent Examination. We will also publish feedback reports.

Once we have considered the consultation responses, we will finalise the Co-Living Housing Planning Advice Note in spring 2025.

We will prepare a feedback report on the Consultation Draft Planning Obligations Supplementary Planning Document (SPD), and submit the document as evidence for the Independent

Examination. We expect to publish a final version when we adopt the Local Plan.

Evidence Base: Pre-Submission

We are developing a range of new and updated evidence to support the Local Plan review. We will publish the evidence base here as we develop it. You can search by name and/or category.

If you search by name or reference number, you can do this with or without choosing the category.

Alternatively, you can list all the documents in a category by choosing the category from the drop-down list and clicking on search.

We used several evidence base documents to support the adopted Local Plan. Many of these are still relevant or we will be updating them during the Local Plan review. Although they do not form part of this consultation, you can still view the evidence base for the Adopted Local Plan.

Search by name or reference **Category**

All

Search Reset

Document	Category
AH001 Chelmsford Strategic Housing Needs Assessment	Delivering affordable homes for all
AH002 Housing Capacity in Chelmsford City Centre and Urban Area 2024	Delivering affordable homes for all
AH003 Chelmsford Gypsy and Traveller Accommodation Assessment (GTAA) 2024	Delivering affordable homes for all
AH004 Chelmsford Strategic Housing Needs Assessment Addendum (November 2024)	Delivering affordable homes for all
BG001 Chelmsford Local Wildlife Sites Review 2024	Increasing biodiversity and green spaces

Document	Category
BG002 Chelmsford Local Wildlife Sites Review (November 2024)	Increasing biodiversity and green spaces
BG003-A Open Space, Sport & Recreation Study – Executive Summary (December 2024)	Increasing biodiversity and green spaces
BG003-B Open Space Study (December 2024)	Increasing biodiversity and green spaces
BG003-C Indoor Sports Assessment & Strategy – Needs Assessment (December 2024)	Increasing biodiversity and green spaces
BG003-D Indoor Sports Assessment & Strategy – Strategy & Action Plan (December 2024)	Increasing biodiversity and green spaces
BG003-E Playing Pitch & Outdoor Sport Strategy – Assessment Report (December 2024)	Increasing biodiversity and green spaces

Document	Category
BG003-F Playing Pitch & Outdoor Sport Strategy – Strategy & Action Plan (December 2024)	Increasing biodiversity and green spaces
CC001: Strategic Flood Risk Assessment 2024 (Level 1)	Addressing the climate change emergency
CC002: Water Cycle Study, Scoping 2024	Addressing the climate change emergency
CC003: Water Cycle Study, Stage 2 Detailed Study 2024	Addressing the climate change emergency
CC004 Essex Open Legal Advice – Energy Policy and Building Regulations 2024	Addressing the climate change emergency
CC005 Report 1: Essex Net Zero Policy – Technical Evidence Base 2023	Addressing the climate change emergency

Document	Category
CC006 Report 2: Essex Net Zero Policy – Summary of Policy, Evidence and Validation Requirements 2023	Addressing the climate change emergency
CC007-A Net Zero Carbon Viability Study for Essex – Summary report 2022	Addressing the climate change emergency
CC007-B Net Zero Carbon Viability Study for Essex – Main report 2022	Addressing the climate change emergency

< 1 2 3 4 5 6 >

Other useful information

Local Plan review stages

We adopted our current Local Plan in May 2020. It guides growth and development across Chelmsford City Council's area to 2036. We need to review the plan at least every five years, to see if we need to update it. The review means that the Local Plan will now run until 2041.

Issues and Options (previous stage)

This was the first stage of consultation, which took place in 2022. Many people and organisations commented, and we have carefully considered all the responses, alongside updated evidence, national planning policy, new local priorities, and monitoring data.

You can read an ↓ Issues and Options feedback report which sets out the consultation feedback we received on the Issues and Options consultation and how we have taken the comments into account when preparing the Preferred Options Local Plan.

Preferred Options (previous stage)

This consultation was the second formal stage in the preparation of the review plan, and involved residents, businesses, developers, and other interested parties.

We have published a ↓ Preferred Options feedback report setting out a review of the consultation activity, a summary of the representations we received, and how these comments have been used to develop the Pre-Submission Local Plan document.

Pre-Submission (current stage)

This consultation is the third formal stage in the preparation of the review plan. This consultation focuses on legal compliance and consistency with national planning policy.

The consultation runs for a period of six weeks from 10am on Tuesday 4 February 2025 to 4pm on Tuesday 18 March 2025.

Submission (future stage)

This is the formal Submission of the Local Plan. We will submit all plan documents, evidence, and comments to the Planning Inspector for an Independent Examination.

Neighbourhood Plan consultations

We recently consulted on two Neighbourhood Plans. These have been developed by Broomfield and Danbury Parish Councils and cover a wide range of issues such as landscape, transport, recreation, heritage, building design, and business.

Both the Danbury Neighbourhood Plan and the Broomfield Neighbourhood Plan have been made (adopted).

You can view the:

- Broomfield Neighbourhood Plan
- Danbury Neighbourhood Plan

Integrated Impact Assessment

We will continue to assess the Local Plan as we review it, to make sure it contributes towards sustainability. We will assess the following aspects of sustainable development:

- Sustainability Appraisal
- Strategic Environmental Assessment
- Habitats Regulations Assessment
- Health Impact Assessment
- Equality Impact Assessment

The IIA assesses the issues and options against a range of social, environmental and economic indicators and helps to identify all the likely significant effects. The IIA advises on ways in which any adverse effects could be avoided, reduced or mitigated or how any positive effects could be maximised. This helps to ensure that the emerging policies, plans and allocations in the Local Plan are promoting sustainable development.

Call for Sites and SHELAA

We use the Strategic Housing and Employment Land Availability Assessment (SHELAA) to assess sites nominated by landowners, promoters and developers. This helps us when researching and developing future Local Plans.

The SHELAA 2023/2024 is our latest published assessment. This assesses the sites put forward to us for consideration as part of the Local Plan Review. You can view the outcomes of that assessment.

The SHELAA is open all year round, meaning you can submit a new site or amend an existing site on a rolling basis. We aim to assess submissions yearly. We anticipate that the next cut-off point for submissions will be spring 2025.

You can submit a site for future assessment, or amend an already submitted site, through the current SHELAA facility.

You can find out more about
how to submit or amend a site, and see the latest assessment outcomes
.

Using the consultation portal

We have a specially designed consultation portal for Local Plan and other planning policy consultations.

If you register, you can:

- read and save consultation documents
- make your comments online
- receive alerts on future consultations

You can find out more about how to use the consultation portal.

Local Development Scheme

We use the Local Development Scheme (LDS) to manage the plan-making process. It sets out our timetable for preparing the documents and for consulting on the Local Plan review.

We first adopted an LDS in 2006 and we have reviewed it regularly as we have made progress on producing our Local Plan.

This LDS is the ninth review. You can download the ↓ Chelmsford Local Development Scheme 2023-2028.

You can also download the ↓ eighth review of the LDS, which we published in November 2021. You can view the changes we have made since November 2021 in Appendix 1 of the 2023-2028 LDS document.

Duty to Co-operate

We are committed to working with other councils and key organisations on planning issues that cross council boundaries.

The organisations we regularly work with include Essex County Council, National Highways, environmental organisations and education providers.

We have to ensure that we properly co-ordinate strategic issues such as:

- land for new homes and jobs
- infrastructure
- providing schools
- mitigating climate change

We have adopted a Duty to Co-operate Strategy, which sets out who we will co-operate with and when, plus how we will do it.

You can download the Duty to Co-operate Strategy.

Is there something wrong with this page?

Last updated: 07 March 2025

Chelmsford City Council

Search site

Consultations

We hold consultations on important issues in the Chelmsford area, so that local people can shape where they live and the services they receive.

Our ↓ Consultation and Engagement Strategy outlines our long-term approach to:

- involving residents in a consistent and coordinated way
- using corporate standards
- adopting innovative approaches

Also in this section

- Feedback about our services
- Petitions

- following best practice

Our strategy ensures that our consultations are inclusive, accessible and a worthwhile experience for everyone involved.

Current consultations

Local Plan Review

We need to review our Local Plan every five years. We are currently consulting on the Chelmsford Local Plan: Pre-Submission (Regulation 19) Document until 18 March 2025. Find out more about the Local Plan Review.

Public Spaces Protection Orders (PSPO) for Chelmsford City Centre

Whistleblowing (report wrongdoing by council staff)

Contact Democratic Services

Contact the team online

01245 606480

We are currently asking for your view on extending the Chelmsford City Centre PSPO.

We are proposing to extend the PSPO for a further three years, from 11 April 2025. this will allow us to can continue to control the prohibited activities outlined in the PSPO, to ensure the quality of life of those who live, visit, and work in the city centre.

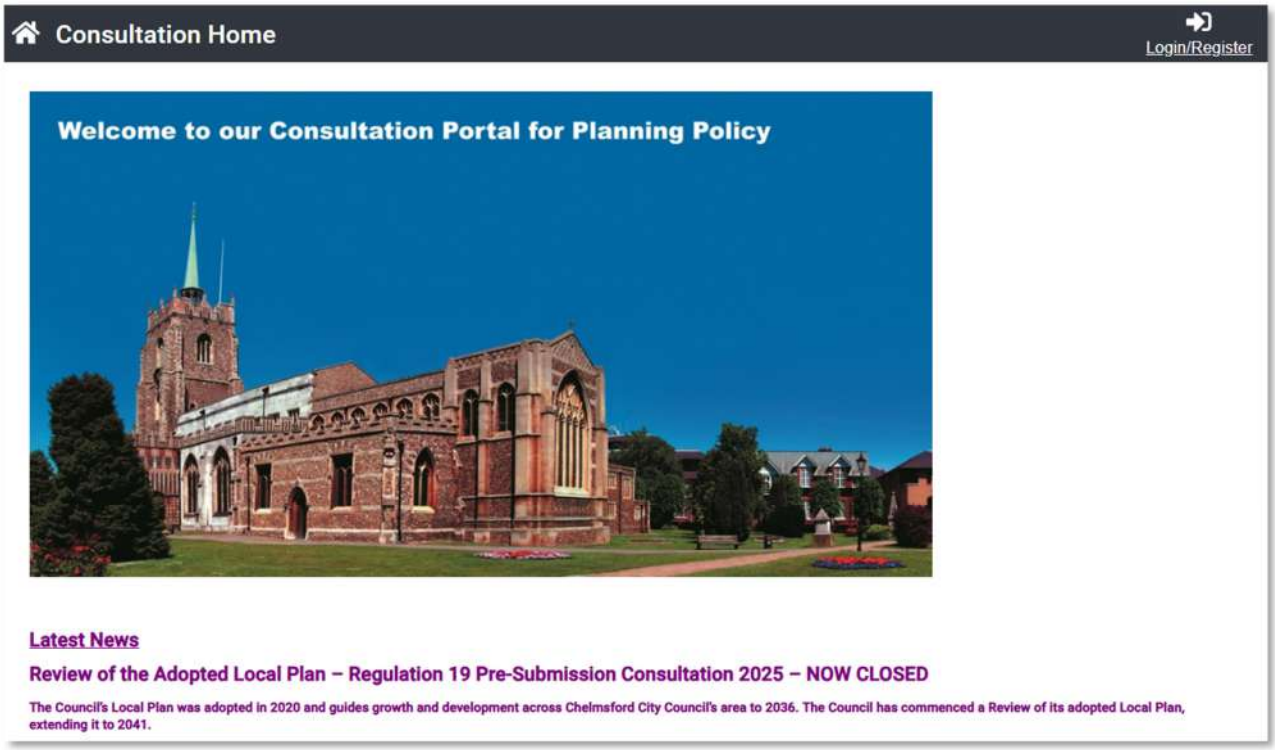
You can ↓ view the proposed order, and comment on the PSPO online.

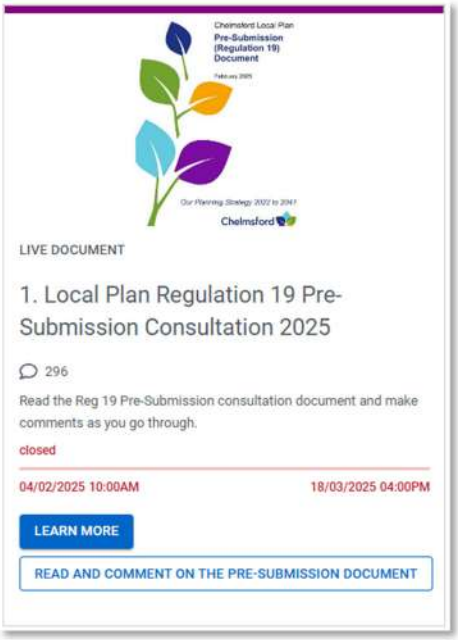
You need to submit any comments on the proposed PSPO by 5pm on Monday 24 March 2025.

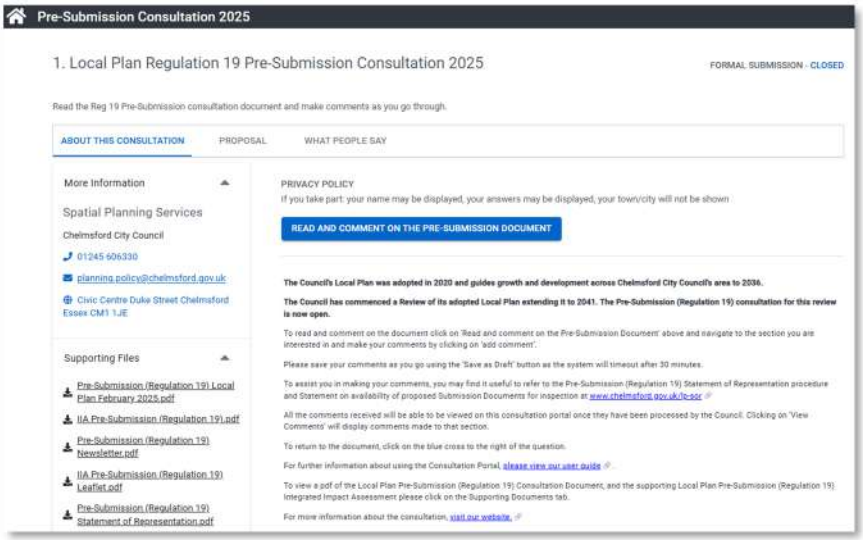
Closed consultations >

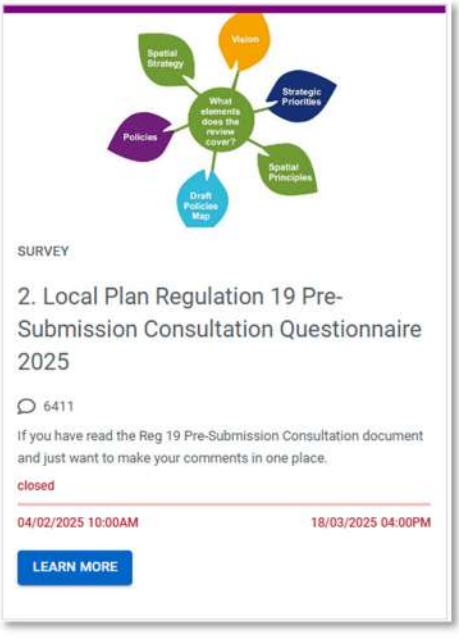
External consultations >

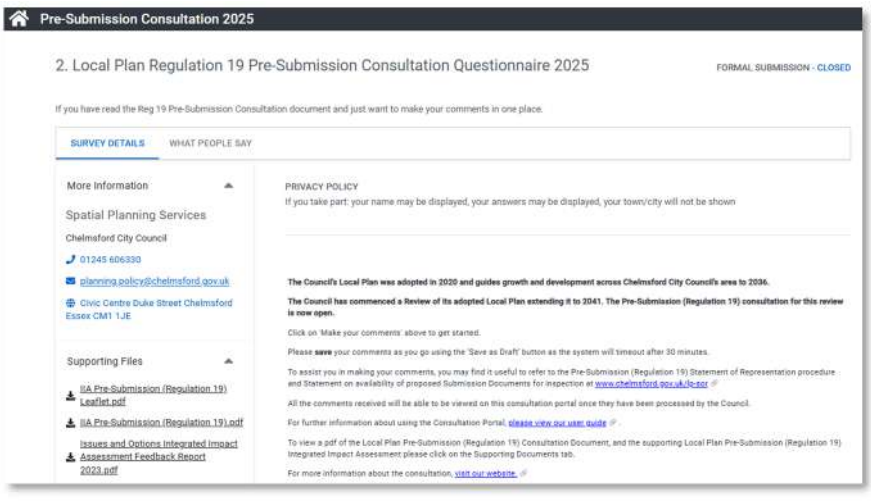
Is there something wrong with this page? >


Consultation Home
Login/Register
Welcome to our Consultation Portal for Planning Policy
Latest News
Review of the Adopted Local Plan – Regulation 19 Pre-Submission Consultation 2025 – NOW CLOSED
The Council's Local Plan was adopted in 2020 and guides growth and development across Chelmsford City Council's area to 2036. The Council has commenced a Review of its adopted Local Plan, extending it to 2041.


Chelmsford Local Plan
Pre-Submission (Regulation 19) Document
Chelmsford
LIVE DOCUMENT
1. Local Plan Regulation 19 Pre-Submission Consultation 2025
296
Read the Reg 19 Pre-Submission consultation document and make comments as you go through.
closed
04/02/2025 10:00AM
18/03/2025 04:00PM
LEARN MORE
READ AND COMMENT ON THE PRE-SUBMISSION DOCUMENT


Pre-Submission Consultation 2025
1. Local Plan Regulation 19 Pre-Submission Consultation 2025
FORMAL SUBMISSION - CLOSED
Read the Reg 19 Pre-Submission consultation document and make comments as you go through.
ABOUT THIS CONSULTATION
PROPOSAL
WHAT PEOPLE SAY
More Information
Spatial Planning Services
Chelmsford City Council
01245 606330
planning.policy@chelmsford.gov.uk
Civic Centre Duke Street Chelmsford Essex CM1 1JE
Supporting Files
Pre-Submission (Regulation 19) Local Plan February 2025.pdf
IIA Pre-Submission (Regulation 19).pdf
Pre-Submission (Regulation 19) Newsletter.pdf
IIA Pre-Submission (Regulation 19) Leaflet.pdf
Pre-Submission (Regulation 19) Statement of Representation.pdf
PRIVACY POLICY
If you take part: your name may be displayed, your answers may be displayed, your town/city will not be shown
READ AND COMMENT ON THE PRE-SUBMISSION DOCUMENT
The Council's Local Plan was adopted in 2020 and guides growth and development across Chelmsford City Council's area to 2036.
The Council has commenced a Review of its adopted Local Plan extending it to 2041. The Pre-Submission (Regulation 19) consultation for this review is now open.
To read and comment on the document click on 'Read and comment on the Pre-Submission Document' above and navigate to the section you are interested in and make your comments by clicking on 'add comment'.
Please save your comments as you go using the 'Save as Draft' button as the system will timeout after 30 minutes.
To assist you in making your comments, you may find it useful to refer to the Pre-Submission (Regulation 19) Statement of Representation procedure and Statement on availability of proposed Submission Documents for inspection at www.chelmsford.gov.uk/lp-psr
All the comments received will be able to be viewed on this consultation portal once they have been processed by the Council. Clicking on 'View Comments' will display comments made to that section.
To return to the document, click on the blue cross to the right of the question.
For further information about using the Consultation Portal, please view our user guide
To view a pdf of the Local Plan Pre-Submission (Regulation 19) Consultation Document, and the supporting Local Plan Pre-Submission (Regulation 19) Integrated Impact Assessment please click on the Supporting Documents tab.
For more information about the consultation, visit our website.


Vision
Strategic Priorities
Spatial Principles
Draft Policies Map
Policies
Spatial Strategy
What elements does the review cover?
SURVEY
2. Local Plan Regulation 19 Pre-Submission Consultation Questionnaire 2025
6411
If you have read the Reg 19 Pre-Submission Consultation document and just want to make your comments in one place.
closed
04/02/2025 10:00AM
18/03/2025 04:00PM
LEARN MORE


Pre-Submission Consultation 2025
2. Local Plan Regulation 19 Pre-Submission Consultation Questionnaire 2025
FORMAL SUBMISSION - CLOSED
If you have read the Reg 19 Pre-Submission Consultation document and just want to make your comments in one place.
SURVEY DETAILS
WHAT PEOPLE SAY
More Information
Spatial Planning Services
Chelmsford City Council
01245 606330
planning.policy@chelmsford.gov.uk
Civic Centre Duke Street Chelmsford Essex CM1 1JE
Supporting Files
IIA Pre-Submission (Regulation 19) Leaflet.pdf
IIA Pre-Submission (Regulation 19).pdf
Issues and Options Integrated Impact Assessment Feedback Report 2023.pdf
PRIVACY POLICY
If you take part: your name may be displayed, your answers may be displayed, your town/city will not be shown
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Click on 'Make your comments' above to get started.
Please save your comments as you go using the 'Save as Draft' button as the system will timeout after 30 minutes.
To assist you in making your comments, you may find it useful to refer to the Pre-Submission (Regulation 19) Statement of Representation procedure and Statement on availability of proposed Submission Documents for inspection at www.chelmsford.gov.uk/lp-psr
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For further information about using the Consultation Portal, please view our user guide
To view a pdf of the Local Plan Pre-Submission (Regulation 19) Consultation Document, and the supporting Local Plan Pre-Submission (Regulation 19) Integrated Impact Assessment please click on the Supporting Documents tab.
For more information about the consultation, visit our website.

CONSULTATION PORTAL GUIDANCE NOTES

Online Consultation Portal:

Go to: www.chelmsford.gov.uk/planningpolicyconsult where you can:

- Read the consultation documents
- Make your comments
- Sign up for alerts to feedback reports and future consultations

This is our preferred means of receiving comments as it ensures that your comments are recorded accurately and are processed quickly.

You can view, download, and comment on all current consultations on the online Consultation Portal. It also allows you to edit comments before submitting them, save a draft and return to your form later, and to upload any supporting material.

Before making your comments, you may find it useful to refer to the **Pre-Submission (Regulation 19) Statement of Representation Procedure and Statement on Availability of Proposed Submission Documents for Inspection** www.chelmsford.gov.uk/lp-sor

If you require assistance please call 01245 606330 during normal office hours (08.45am to 4.45pm Monday to Thursday; 08.45am to 4.00pm Friday) or email planning.policy@chelmsford.gov.uk

For further information about the Local Plan please visit www.chelmsford.gov.uk/lp-review

The consultation period runs from 10am on 4 February 2025 until 4pm on 18 March 2025.
Comments received before or after this time cannot be accepted.

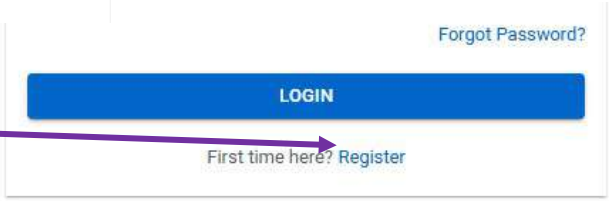
How to register

If you have not already registered, registration is simple using the easy to follow steps. Find the Consultation Portal at:
www.chelmsford.gov.uk/planningpolicyconsult



- go to the Consultation Portal
- click on Login/Register button

- click on Register



A registration screen will open.
You then need to read the terms and conditions, and the privacy policy, and tick the boxes.
Then you can:

- create a username
- choose a password (this should be as secure as possible, and include a mix of numbers and letters)

You should only register as an agent if you are representing someone else in a professional capacity, such as a developer or a client.

When you have added your information, click REGISTER. We will send you an email with a link, inviting you to activate your account. After clicking the link, click on your name (top right of screen) and My Details to complete your information.

It is important that you fill in your postal address, so that we have an alternative means of contacting you.

Forgotten login details?

If you have already signed up but forgotten your login details, you should not register again, as this will create a duplicate record.

- go to the Consultation Portal
- click on Sign in button
- click the 'Forgot Password?' link to reset your password

If you are still experiencing problems, you can contact the Planning Policy Helpline on 01245 606330.

How to read the consultation documents and make a comment

Open the Consultation Portal at: www.chelmsford.gov.uk/planningpolicyconsult

Choose the consultation that you are interested in.

We are consulting on the following.

1. Chelmsford Local Plan – Pre-Submission (Regulation 19) Document – this is the main consultation document where we include sites where new homes, jobs and other facilities will be located as well as areas for protection. We need you to consider whether the Pre-Submission Document is legally compliant and consistent with national policy, and answer specific consultation questions on this.

2. Chelmsford Local Plan – Pre-Submission (Regulation 19) Questionnaire – this is a simple questionnaire you can use if you have read the consultation document and just want to make your comments in one place. We need you to consider whether the Pre-Submission Document is legally compliant and consistent with national policy, and answer specific consultation questions on this.

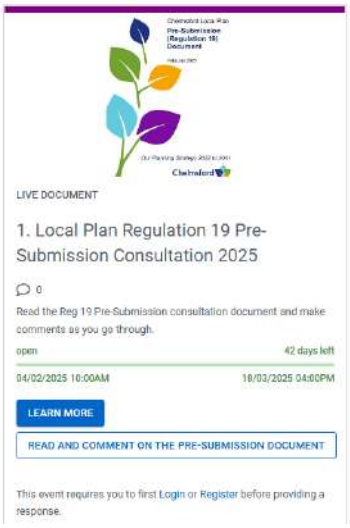
3. Pre-Submission Integrated Impact Assessment (IIA) – this includes environmental, habitats, quality and health assessments of the impacts of the Pre-Submission Local Plan.

4. Co-Living Housing Planning Advice Note Consultation – this provides practical guidance to potential promoters or developers of co-living housing in Chelmsford.

5. Consultation Draft Planning Obligations Supplementary Planning Document (SPD) – this sets out how we will seek planning obligations such as financial contributions towards important site improvements when considering planning applications.

1. Pre-Submission (Regulation 19) Document - How to make a comment

Go to the consultation



Select ‘Learn More’

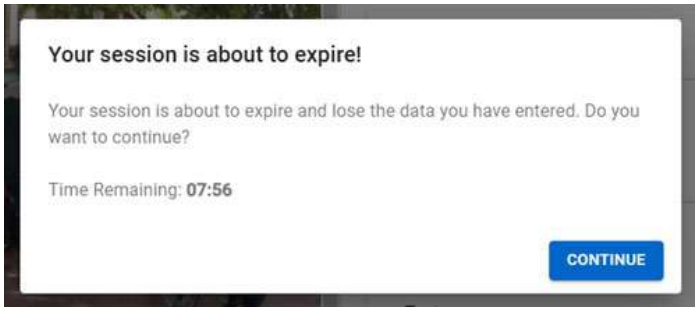
You can read the whole document from the beginning, and move through by scrolling with your mouse or scroll bar. Otherwise, you can use the contents page to navigate the document and select which part of the document you wish to view.

Once you have chosen which part of the plan you wish to comment on, select ‘ADD COMMENT’. This will open a comment form where you can use the specifically designed questions to respond. You will need to log in to make a comment.

Please note you will need to add your comments through a new comment form for each paragraph, policy, map, table, figure or appendix you wish to comment on.

Please **save** your comments as you complete the form using the ‘Save Draft’ button at the bottom of the form as the system will timeout after 30 minutes.

You will get a reminder 10 minutes before the system times out. You will need to select ‘Continue’, and then make sure that you ‘Save Draft’.

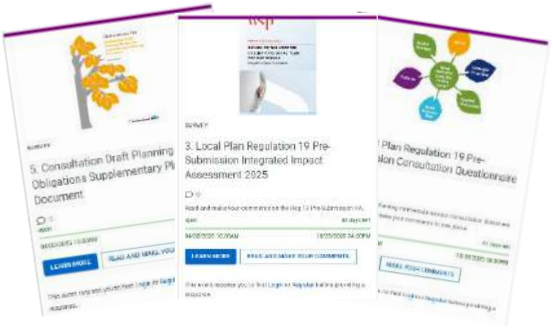


When you have completed the comments form, do not forget to select ‘Submit’.

How to make a comment – other consultations

2. Chelmsford Local Plan – Pre-Submission (Regulation 19) Questionnaire
3. Pre-Submission Integrated Impact Assessment (IIA)
4. Co-Living Housing Planning Advice Note Consultation
5. Consultation Draft Planning Obligations Supplementary Planning Document (SPD) –

Go to the consultation you are interested in and select the ‘Learn More’ button:



The consultation document and the supporting documents are listed on the left side.
Please read the documents before making your comments.

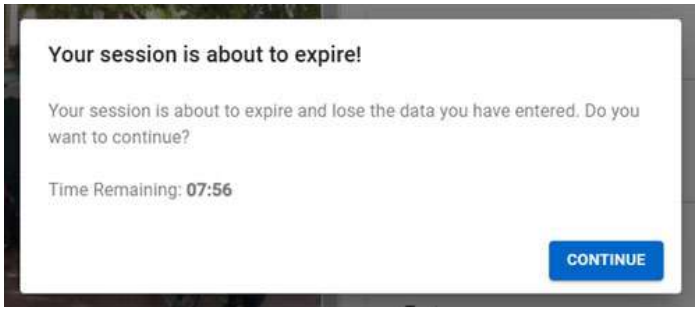


When you are ready to make your comments, click on the ‘Read and make your comments’ button.



Please **save** your comments as you complete the form using the ‘Save Draft’ button at the bottom of the form as the system will timeout after 30 minutes.

You will get a reminder 10 minutes before the system times out. You will need to select ‘Continue’, and then make sure that you ‘Save Draft’.



When you have completed the comments form, do not forget to select ‘Submit’.

Important notes:

If you are submitting a representation of significant length, please provide a summary of not more than 200 words. We will request a summary in appropriate circumstances if it is not originally provided.

When uploading supporting documents, please ensure they contain no signatures, e-mail addresses or personal postal addresses.

To be duly made, you need to provide your name and address with your comment. Anonymous comments will not be accepted.

Comments will be published with the respondent's name, organisation and agent (where applicable). No other personal details will be made public. This includes publication on the Council's Consultation Portal. Data will be held in accordance with the Data Protection Act 1998 and the General Data Protection Regulations. For more information please visit the Council's Privacy Policy web page: www.chelmsford.gov.uk/your-council/about-ourwebsite/privacy-policy-and-notices/privacy-policy/

Section 149 of the Equality Act 2010 requires the Council to avoid any form of discrimination and also foster good relations between different ethnic groups. We will not display, share or consider any comments that are inappropriate, including those that are racist, inflammatory or derogatory. Comments which contain personal or sensitive information e.g. health information, details about a criminal record, or religious beliefs, will not be accepted.

Petitions:

If you are organising a petition or intend to, or have signed one, it must be submitted by 4.00pm on 18 March 2025 and be accompanied by the name and contact details for the petition organiser. The Council will register the petition organiser on the Consultation Portal and the number of signatories will be assigned to that comment/s, but names and addresses of all signatories will not be published. Acknowledgement of the petition and any future Local Plan notifications will only be sent to the petition organiser.

Helpline:

If you require assistance please call 01245 606330 during normal office hours (08.45am to 4.45pm Monday to Thursday; 08.45am to 4.00pm Friday) or email planning.policy@chelmsford.gov.uk

Consultation on Chelmsford Local Plan - Pre-Submission (Regulation 19) Document

PAPER COMMENTS FORM

This form has three Parts:

- Part A - Consultation Details
- Part B - Contact Details
- Part C - Your Comments on the Chelmsford Local Plan - Pre-Submission (Regulation 19) Document

Part A - Consultation Details

Chelmsford City Council has published the Chelmsford Local Plan - Pre-Submission (Regulation 19) Document and accompanying Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment for consultation in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.

How to comment

This form is for your comments on the Chelmsford Local Plan - Pre-Submission (Regulation 19) Document. There is a separate form for the Pre-Submission Integrated Impact Assessment.

The Council strongly encourages comments to be made via its online Consultation Portal www.chelmsford.gov.uk/planningpolicyconsult as this enables the quick and efficient handling of comments. This system allows you to edit comments before submitting them and to upload any supporting material.

For further information about how the Consultation Portal works, read our User Guide at: www.chelmsford.gov.uk/lp-portal-guide Alternatively, comments can be made using this representation form and returned to:

- By email - planning.policy@chelmsford.gov.uk
- By post - Planning and Housing Policy, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE
- By hand - Chelmsford City Council Customer Service Centre, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, Monday to Friday 10am-4pm.

How comments will be used

To be duly made, you need to provide your name and address with your comment. Anonymous comments will not be accepted. At this stage of Local Plan preparation, comments should focus on legal compliance and the soundness of the Local Plan. This is the information required by the Planning Inspectorate who will independently examine the Local Plan and consider any unresolved objections.

Comments will be published with the respondent's name, organisation and agent (where applicable). No other personal details will be made public. Data will be held in accordance with the Data Protection Act 1998 and the General Data Protection Regulations. For more information please visit the Council's Privacy Policy web page: www.chelmsford.gov.uk/your-council/about-our-website/privacy-policy-and-notices/privacy-policy/

A copy of all duly made representations to the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document and Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector). These representations will be 'made available' in line with the Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20, 22 and 35). This includes publication on the Council's Consultation Portal.

Section 149 of the Equality Act 2010 requires the Council to avoid any form of discrimination and also foster good relations between different ethnic groups. We will not display, share or consider any comments that are inappropriate, including those that are racist, inflammatory or derogatory. Comments which contain personal or sensitive information e.g. health information, details about a criminal record, or religious beliefs, will not be accepted and/or will be redacted.

Part B - Contact Details

Personal Details

Title: .....

First Name: .....

Last Name: .....

Organisation (if the comments you are making are on behalf of an organisation):

.....

Address: .....

.....

.....

.....

Postcode: .....

Telephone Number: .....

Email Address:

.....

Consultation ID (if known): .....

Signature: .....

Date: .....

Agent Details (if applicable)

Title: .....

First Name: .....

Last Name: .....

Organisation (if the comments you are making are on behalf of an organisation):

.....

Address: .....

.....

.....

.....

Postcode: .....

Telephone Number: .....

Email Address:

.....

Consultation ID (if known): .....

Signature: .....

Date: .....

Comments must be received by 4.00pm on 18 March 2025

Part C - Your Comments on the Chelmsford Local Plan - Pre-Submission (Regulation 19) Document

ESSENTIAL INFORMATION

Which part of the Chelmsford Local Plan - Pre-Submission (Regulation 19) Document does the representation relate to:

Paragraph Number:	
Policy Number:	
Policies Map Number or Name:	
Table Number:	
Figure Number:	
Appendix:	

Important Note:
If you wish to submit a representation on more than one part of the Local Plan, please complete a continuation sheet as provided for each one e.g. on more than one proposed site allocation, or policy.

To assist you in completing this form you may find it useful to refer to the Pre-Submission (Regulation 19) Statement of Representation Procedure and Statement on Availability of Proposed Submission Documents for Inspection (www.chelmsford.gov.uk/lp-sor).

Question 1:
Do you consider the Local Plan legally compliant in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012?
For the definition of 'legally compliant', please refer to the **Statement of Representation.**

Yes ☐ No ☐

Please provide an explanation below. Please provide precisely and succinctly all the evidence and supporting information necessary to support your representation:

If you need more room, please continue on a separate sheet and attach it to this form.

Comments must be received by 4.00pm on 18 March 2025

Question 1a:
Please set out below the modifications you consider necessary to make the Local Plan legally compliant including revised wording of any policy or text. Please provide precisely and succinctly all the evidence and supporting information necessary to support your representation:

If you need more room, please continue on a separate sheet and attach it to this form.

Question 2:
Does the Local Plan comply with the Duty to Co-operate?

For information on the term 'Duty to Co-operate', please refer to the **Statement of Representation.**

Yes ☐ No ☐

Please provide an explanation below:

If you need more room, please continue on a separate sheet and attach it to this form.

Question 2a:
Please set out below any changes to the approach taken which you consider necessary to ensure the Duty to Co-operate is met. Please include revised wording of any policy or text to the Local Plan. Please be as precise and succinct as possible:

If you need more room, please continue on a separate sheet and attach it to this form.

Comments must be received by 4.00pm on 18 March 2025

Question 3:
Do you consider the Local Plan to be 'sound'? To be found 'Sound' a Local Plan should be positively prepared, justified, effective and consistent with National Policy.
For more information on the term 'Soundness', please refer to the **Statement of Representation.**

Yes ☐ No ☐

If No, because you consider the Local Plan is NOT:

☐ Positively prepared
☐ Justified
☐ Effective
☐ Consistent with national policy

Question 3a:
Please provide an explanation below and identify the main issues:

If you need more room, please continue on a separate sheet and attach it to this form.

Question 3b:
Please set out below the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text. Please be as precise and succinct as possible:

If you need more room, please continue on a separate sheet and attach it to this form.

Comments must be received by 4.00pm on 18 March 2025

Question 4:
If your representation is seeking a change, do you consider it necessary to take part and speak at the Independent Examination hearing?
It is the Planning Inspector's decision who will participate and be heard at the Independent Examination.
In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the examination process.

Yes ☐ No ☐

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

Question 4a:
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you need more room, please continue on a separate sheet and attach it to this form.

Question 5: Executive Summary
If you are submitting a representation of significant length, please provide a summary of the main issues in your representation in no more than 200 words. We will request a summary in appropriate circumstances if it is not originally provided.

Please provide an executive summary of the main issues below:

If you need more room, please continue on a separate sheet and attach it to this form.

Comments must be received by 4.00pm on 18 March 2025

Question 6:
Do you wish to be notified of the following:
Please note if you **do not** select any boxes, you will not be notified at the following stages of Local Plan preparation.

- ☐ Submission of the Local Plan for Examination
- ☐ Publication of the Inspector's Report
- ☐ Adoption of the Local Plan

If you wish to submit any supporting information, please ensure it contains no signatures, e-mail addresses or personal postal addresses.

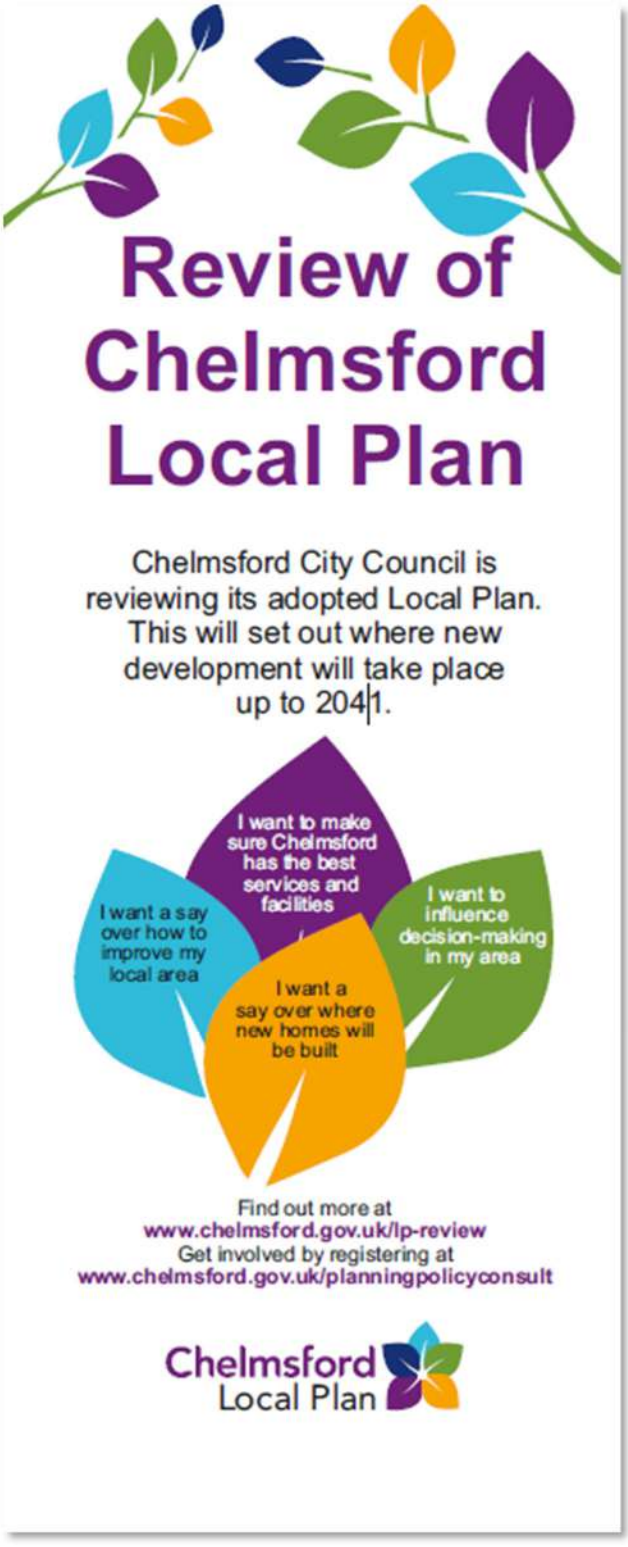
This paper comments form can be made available in alternative formats including large print, audio and other languages.

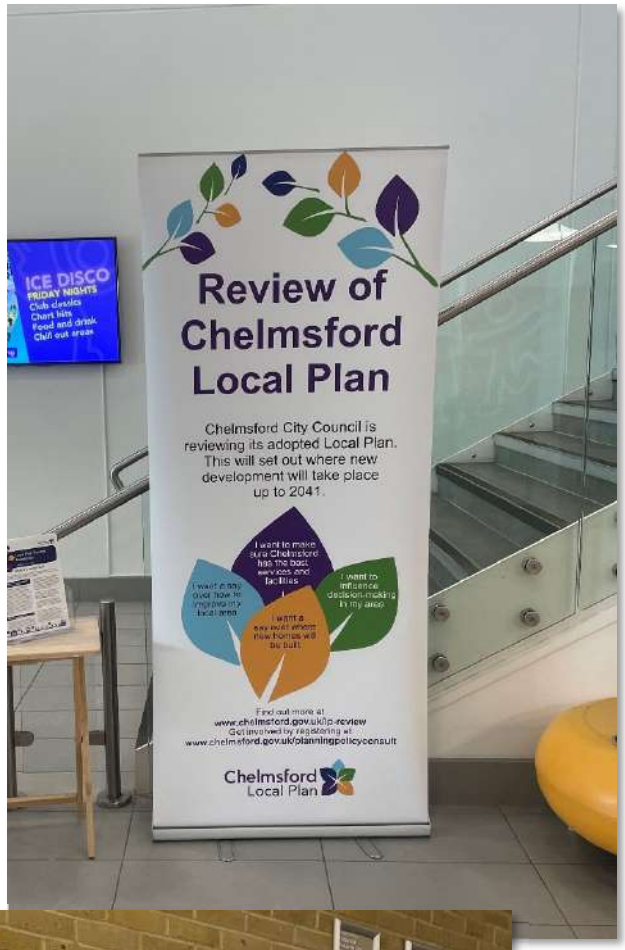
If you require assistance please call 01245 606330 during normal office hours (08.45am to 4.45pm Monday to Thursday; 08.45am to 4.00pm Friday) or email planning.policy@chelmsford.gov.uk

Thank you for being part of the consultation.

Pop-Up stands were located at four venues:

Chelmsford Museum
South Woodham Ferrers Leisure Centre
Riverside Ice & Leisure
Chelmsford Sport and Athletics Centre







Welcome

Thank you for visiting today

What is the Local Plan

Our Local Plan shapes future growth and development of Chelmsford City Council's area. It sets out a positive vision, identifies where and how new development should take place in the future as well as areas and land uses that will be protected.

Why are we reviewing the adopted Chelmsford Local Plan?

We adopted our current Local Plan in May 2020, and good progress is being made with implementing it.

We need to review the plan at least every five years to make sure it remains up to date and meets the changing needs for development growth to 2041.

This consultation is called the Pre-Submission (Regulation 19) Local Plan. It is the third and final stage of consultation towards updating the adopted Local Plan and has been prepared following public consultation in 2022 and 2024. It is your opportunity to feed into the review process and help to shape the plan and the future of your area.

Government requirements mean that we must provide more homes but our aim is to get the right type of development in the right places to meet the growing needs of local people and businesses, while protecting our environment.

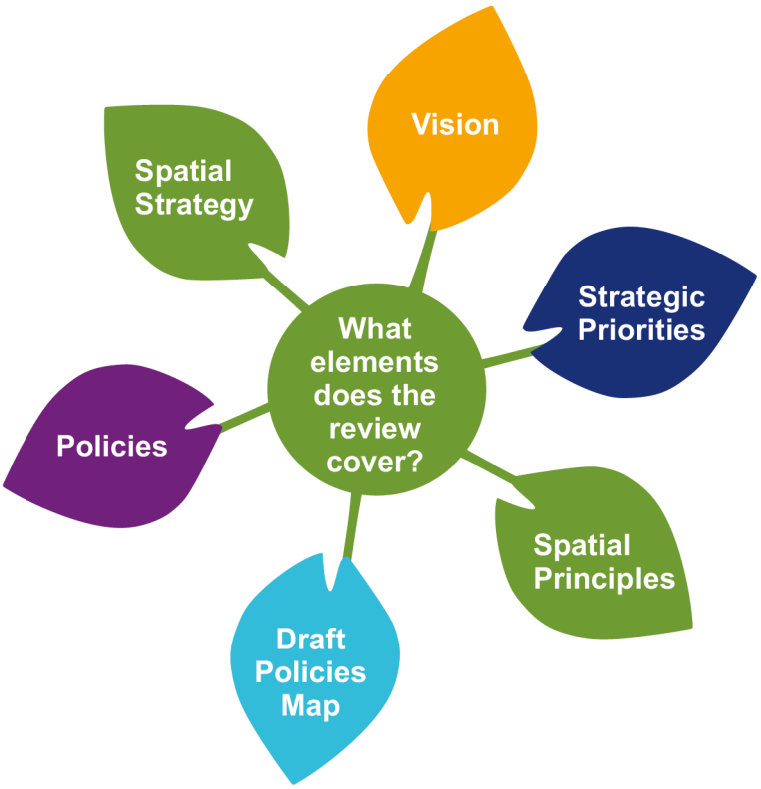
If the Local Plan becomes out of date, the Council could have very little influence over the location of new development and supporting infrastructure. Sites could be promoted for development in locations that the Council and its communities want to protect, and which are not considered sustainable.

What is included in the consultation?

We want to make sure we cover the right issues and that all the suitable options for accommodating change are considered. The Pre-Submission document is a full draft local plan, and includes the following key changes to the adopted Local Plan:

- Updated Strategic Priorities
- New Vision
- The amount of future development needed, including for homes and jobs
- Spatial Strategy, including new site allocations, for accommodating this future development to 2041 and beyond
- Reviewed planning policies.

Many parts of the adopted Local Plan and its policies are still up to date and generally performing well, so they require partial changes. Some changes and new policies are needed to reflect national planning policy requirements, the Council's ambitions and aspirations, and new development growth to 2041 and beyond.



Chelmsford Local Plan

Pre-Submission Local Plan – Background and Challenges

Chelmsford is already an attractive place, comprising the City of Chelmsford, the town of South Woodham Ferrers, numerous villages within attractive countryside and a rich and diverse natural and historic environment. The growth that has taken place, over past 25 years, has helped shape Chelmsford into the successful place it is now.

Vital new infrastructure has been delivered alongside new homes, jobs, shops and leisure opportunities. Chelmsford's economy shows strengths across many sectors, but especially finance, health and education.

Taking into account the projected population increase, we are determined to ensure that future growth continues to take place in a sustainable way. This will bring further improvements to the quality of life for residents and much needed new community and transport infrastructure whilst at the same time protecting and enhancing the natural and historic environment.

The Local Plan is forward looking, shaping the sustainable planning of Chelmsford's development and infrastructure needs not just in the foreseeable future but also providing a longer-term framework.

Previous consultation

We consulted on the first stage of reviewing the Local Plan, called the Issues and Options, from August to October 2022. A total of 1,178 responses were received from 711 people or organsiations, along with a petition. For the Preferred Options consultation from May to June 2024 a total of 10,418 responses were received from 3,678 people or organisations.

We have published feedback documents setting out a review of the consultation activity, a summary of the representations we received, and how these comments have been used to develop the Pre-Submission Local Plan document that we are consulting on now.

You can read the 'You said, We Did' feedback reports on our website at **www.chelmsford.gov.uk/lp-review.**

All the comments received can also be viewed on the Council's planning policy consultation portal at **www.chelmsford.gov.uk/planningpolicyconsult.**

Challenges

Population – is predicted to increase by 11.5% to 202,300 by 2041. Demographic changes will shape the type and size of accommodation necessary over the Local Plan period.

Economy – 12.5% growth in jobs is anticipated by 2041. Due to its location and high education standards, Chelmsford is expected to accommodate a major share of the forecast new employment growth. Significant additional land for employment is proposed through the Local Plan.

Transport – Chelmsford occupies a key place on the regional road and rail network. New development can generate additional service provision and transport investment, through direct provision of facilities and/or financial contributions from developers.

Environment – Chelmsford enjoys a high quality environment including recreational space, parks, gardens, nature reserves and the designated Green Wedge – and over 1,000 Listed Buildings. Development proposals need to balance the needs of development with the preservation and enhancement of natural and historic assets.

Housing – The Council has declared a housing crisis, with many individuals and families in temporary or unsuitable accommodation, an often expensive private rented sector, and an overall limited supply of affordable housing. The Local Plan can help to address this through housing allocations, setting an appropriate mix of homes, and working with housing partners.

Climate change – A climate and ecological emergency was declared in 2019 to tackle the consequences of climate change and reduce our impact on the planet. Closer to home, the Local Plan can set requirements for zero carbon development, boost active and sustainable travel, require expansion of natural habitats, and improve water efficiency and flood risk management.

Communities – health inequalities and wellbeing opportunities can be tackled through the Local Plan by providing the conditions for stronger and more-connected communities.

What has been considered

The Spatial Strategy, setting out where new development should be located, takes the following as a starting point:

Strategic Priorities + Vision + Spatial Principles + Settlement Hierarchy

Our Strategic Priorities

Our Strategic Priorities are the key priorities which set the overall policy direction for the Local Plan.

Priorities for climate	Priorities for growth	Priorities for place
1. Addressing the Climate and Ecological Emergency	4. Ensuring sustainable patterns of development and protecting the Green Belt	7. Creating well designed and attractive places, and promoting the health and social wellbeing of communities
2. Promoting smart, active travel and sustainable transport	5. Meeting the needs for new homes	8. Delivering new and improved strategic and local infrastructure
3. Protecting and enhancing the natural and historic environment, and support an increase in biodiversity and ecological networks	6. Fostering growth and investment and providing new jobs	9. Encouraging resilience in retail, leisure, commercial and cultural development

The updated Vision

Guiding Chelmsford's growth towards a greener, fairer and more connected community

The Local Plan Vision is a high-level guiding statement that sets out what is important for a place and how change will be managed in the future. It is a core part of a Local Plan and all the policies in the Plan will together deliver the Vision. We have reviewed the Local Plan Vision to reflect the new local priorities within the Council's Corporate Plan - Our Chelmsford, Our Plan. We have also considered other national and local priorities and Chelmsford's challenges and opportunities. It has also been simplified, shortened and purposefully aligned to the Corporate Plan, to make it easier to use.

Spatial Principles

The Spatial Principles will ensure that the Pre-Submission Local Plan focuses growth in the most sustainable locations.

a) Locate development at well-connected and sustainable locations
b) Protect the Green Belt from inappropriate development
c) Promote the use of suitable previously developed land for development
d) Continue the renewal and enhance the vitality of Chelmsford City Centre and its Urban Area
e) Focus development at the higher order settlements outside the Green Belt and respect the development pattern and hierarchy of other settlements
f) Respect the character and appearance of landscapes and the built environment, and preserve or enhance the historic and natural environment and biodiversity
g) Locate development to avoid or manage flood risk and reduce carbon emissions
h) Ensure development is served by necessary infrastructure and encourage innovation
i) Locate development to utilise existing and planned infrastructure effectively
j) Ensure development is deliverable.

Settlement Hierarchy

Another factor for developing the Pre-Submission Spatial Strategy and choosing areas for growth is the Settlement Hierarchy, which ranks towns and villages according to their size, function, characteristics and sustainability.

How much growth are we planning for?

Sites allocated in the adopted Local Plan are now coming forward through Masterplans and planning applications.

The next housing target to 2041 is set by a Government formula, called the standard method. The advanced stage of the Pre-Submission Local Plan means we only need to meet 80% of this target.

Housing requirement for Plan period	**22,990 homes**
Completions 2022-23	1,837
Adopted Local Plan allocations	11,867
Sites with planning permission	3,016
Windfall allowance (2026-2041)	2,373
New allocations needed	**4,233**

The Local Plan also plans to meet future employment needs by providing additional employment allocations.

Employment requirement for Plan period	**162,646 sqm**
Adopted Local Plan allocations	55,000 sqm

New housing development, in particular, will be required to provide supporting infrastructure, services and facilities including for:

- Transport improvements including the New Beaulieu Park Rail Station, Chelmsford North East Bypass, Army and Navy junction improvements, and sustainable travel routes
- Community buildings, schools, healthcare, wellbeing measures, sports and cultural facilities
- Green infrastructure including new Country Parks, open space, green/blue networks, biodiversity and public realm improvements
- Preservation and enhancement of historic assets
- Flood risk management and utility infrastructure

New development allocations will be focused on three growth areas of Central and Urban Chelmsford, North Chelmsford and South and East Chelmsford. This distribution of growth is shown on the Key Diagram.



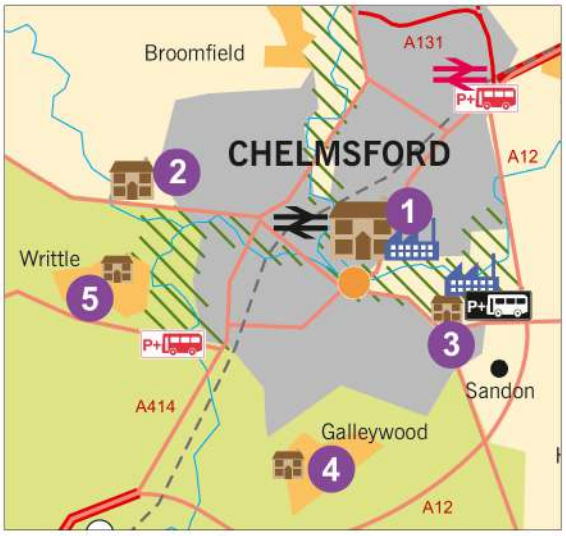
Discounted locations for development

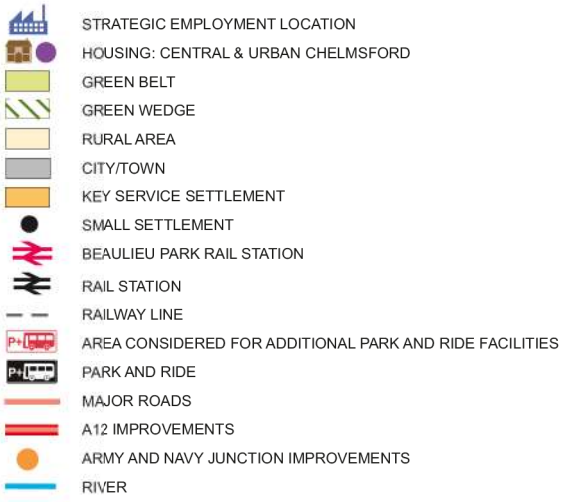
Areas have been discounted as follows:

- The Green Belt, a national designation to prevent encroachment of urban growth into undeveloped areas. This covers almost 34% of the land in the south and west of Chelmsford, shaded in green on the Key Diagram
- The Green Wedge, a key local landscape designation of a green network which prevents urban sprawl and provides for wildlife and nature conservation, flood storage and active travel routes. This covers the river valleys where they pass into Chelmsford's urban area, shaded in hatched green on the Key Diagram
- Areas with known severe constraints/capacities including highways and education
- Areas where no land was being promoted through the Call for Sites exercise

Growth Area 1 – Central and Urban Chelmsford

Development in this area will deliver a number of benefits including green infrastructure and city greening, enhanced bus services, and opportunities to maximise walking and cycling into the City Centre. Previously developed land in the City Centre will be used to strengthen and expand the City as a major residential and employment centre.



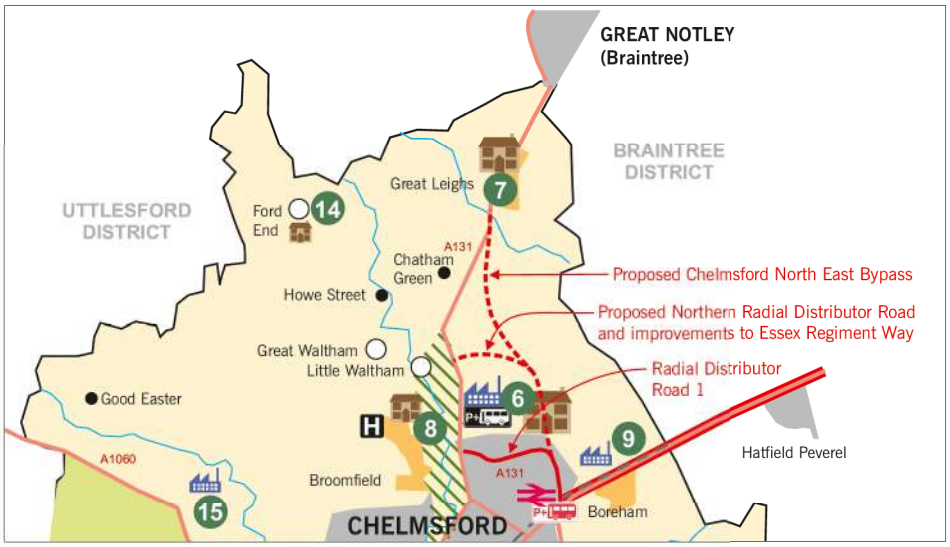


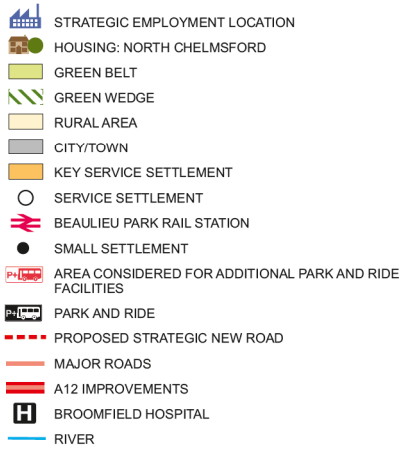
Growth Area 1 – Central and Urban Chelmsford			
Development Allocations		Total Homes	Employment Floorspace
1	Previously developed sites in Chelmsford Urban Area	3,013	4,000sqm Use Class E(g)(i-ii)
2	West Chelmsford	880 plus 5 Travelling Showpeople Plots	
3a	East of Chelmsford - Manor Farm	360	
3b	East of Chelmsford - Land North of Maldon Road		5,000sqm Office/Business Park
3c	East of Chelmsford - Land South of Maldon Road	109	
3d	East of Chelmsford - Land North of Maldon Road	65	
4	Land North of Galleywood Reservoir	24	
5	Land surrounding Telephone Exchange, Ongar Road, Writtle	25	
Area Total		**4,476**	**9,000sqm**

New supporting infrastructure in Growth Area 1
Primary school
Four early years and childcare nurseries
Two new special schools
Country park
Access to Sandford Mill and a visitor centre
Financial contributions to provision of education, community facilities, healthcare, sports and recreation facilities, sustainable transport, local mobility hub and road network enhancements

Growth Area 2 – North Chelmsford

Development in this area will deliver a substantial number of new homes and employment over the Local Plan period, underpinned by a comprehensive package of new infrastructure including new schools, early years and childcare provision, green infrastructure and neighbourhood centres. Significant growth is proposed to Chelmsford Garden Community, along with extensions to two employment sites, and small village allocations.



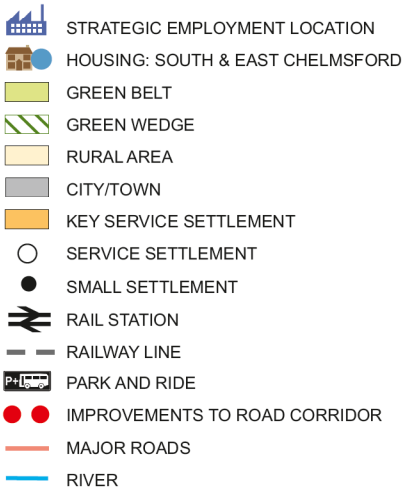


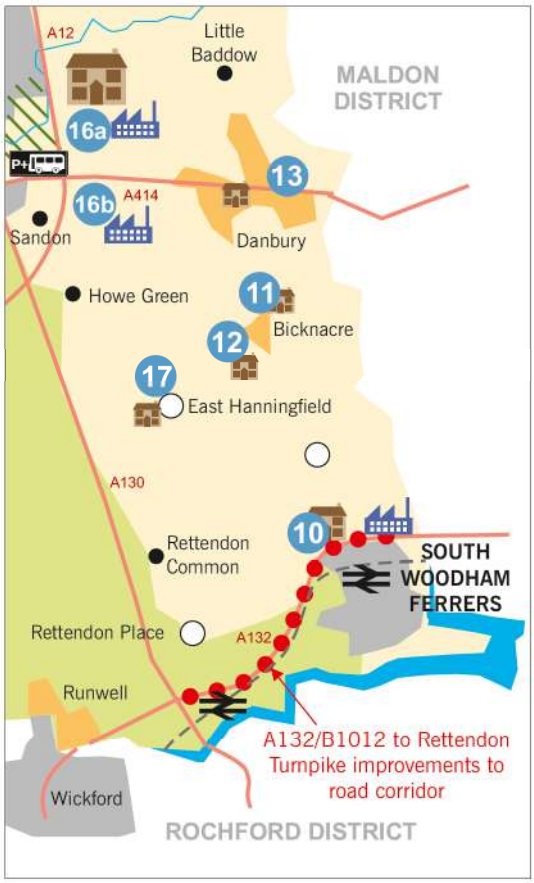
Growth Area 2 – North Chelmsford			
Development Allocations		Total Homes	New Employment Floorspace
6	North East Chelmsford (Chelmsford Garden Community)	5,569 (plus 681 homes post 2041), plus10 Traveller Pitches	56,946sqm Office/Business Park
7a	Great Leighs - Land at Moulsham Hall	750, plus 5 Travelling Showpeople Plots	
7b	Great Leighs - Land East of London Road	250	
7c	Great Leighs - Land North and South of Banters Lane	100	
8	North of Broomfield	512	
9a	Waltham Road Employment Area		3,500sqm B2/B8
14b	Land south of Ford End Primary School, Ford End	20	
15	Little Boyton Hall Farm Rural Employment Area		6,000sqm B2/B8
Area Total		**7,201**	**66,446sqm**

New supporting infrastructure in Growth Area 2
Transport including Phase 1 of Chelmsford North East Bypass, Northern Radial Distributor Road, bus infrastructure
Six village/neighbourhood centres
Secondary school
Five primary schools
Ten early years and childcare nurseries
Country park
Financial contributions to Beaulieu Park Railway Station, provision of education and community facilities, healthcare, sports and recreation facilities, sustainable transport and road network enhancements

Growth Area 3 – South and East Chelmsford

Proposals include a high quality and comprehensively planned new Garden Community to the East of Chelmsford at Hammonds Farm, with a wide range of supporting uses. Also proposed is a strategic employment site, along with four smaller village allocations to contribute towards supporting existing village facilities and services.





Growth Area 3 – South and East Chelmsford		
Development Allocations	Total Homes	New Employment Floorspace
16a East Chelmsford Garden Community (Hammonds Farm)	3,000 (plus 1,500 homes post 2041), plus 20 Traveller Pitches and 13 Travelling Showpeople Plots	43,000sqm Business Space
16b Land adjacent to A12 Junction 18		43,000sqm Business Space
10 North of South Woodham Ferrers	1,220, plus 5 Travelling Showpeople Plots	1,200sqm Business Space
11b Land at Kingsgate, Bicknacre	20	
11c Land west of Barbrook Way, Bicknacre	20	
12 St Giles, Bicknacre	32	
13 Danbury	100	
17a Land north of Abbey Fields, East Hanningfield	11	
17b Land east of Highfields Mead, East Hanningfield	20	
Area Total	**4,423**	**87,200sqm**

New supporting infrastructure in Growth Area 3
Secondary school, up to four primary schools and eight early years and childcare nurseries
Neighbourhood centres
Transport including Bus Based Rapid Transit infrastructure, safe multi-user access routes, and capacity improvements to A132
Country park
Financial contributions to provision of education and community facilities, healthcare, sports and recreation facilities, sustainable transport and road network enhancements

New Sites in Chelmsford City Centre and Urban Area

We are allocating some additional sites in Chelmsford City Centre.

Using previously developed – or brownfield – land will help to strengthen the City as a major residential centre to build on its past success and continue its regeneration. It will also reduce the amount of greenfield land we need to allocate.

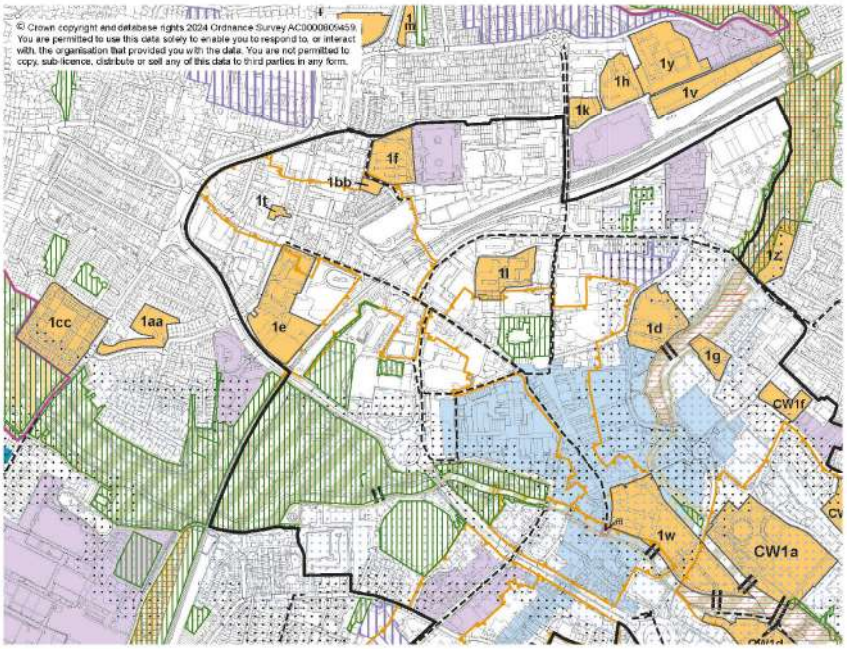
New proposed site allocations will contribute to providing around 3,013 new homes including affordable homes.

Site	Proposal	Supporting Infrastructure
1w Meadows Shopping Centre and Meadows Surface Car Park	Around 757 homes	Enhanced pedestrian and cycle routes Local mobility hub Improved access to waterways On-site open space
1y Land between Hoffmans Way and Brook Street	Around 100 homes	Play area with equipment Pedestrian and cycle connections Preserve nearby listed buildings Public realm improvements
1z Granary Car Park, Victoria Road	Around 50 homes	Links to pedestrian/cycle network Preserve nearby listed buildings Retain natural landscaping and setting Make good use of the waterside location
1aa Coval Lane Car Park	Around 40 homes	Retain natural landscaping Provide sustainable drainage and flood risk management
1bb Glebe Road Car Park	12 homes	Conserve the setting of nearby listed buildings
1cc Andrews Place	183 net new homes	Conserve and enhance biodiversity at Admirals Park Provide connectivity to surrounding travel networks Maintain access to the nearby allotments

There are 20 allocated sites in the City Centre being brought forward from the adopted Local Plan, including some where numbers have been slightly increased.

Sites in the Urban Area will also be brought forward, as they have already been allocated in the adopted Local Plan. These are at:

- West Chelmsford
- East of Chelmsford
- Galleywood
- Writtle



Chelmsford Local Plan

New Proposed Garden Community

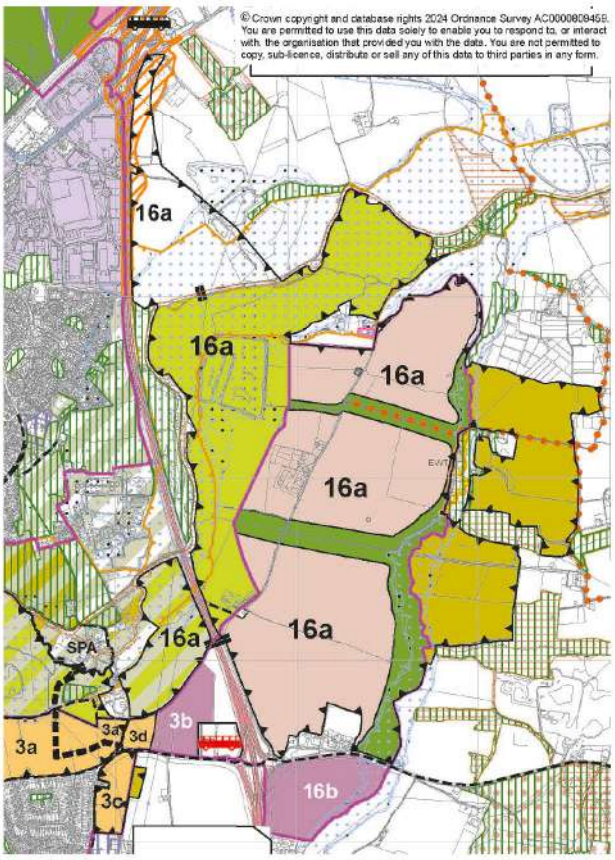
16a – East Chelmsford Garden Community (Hammonds Farm)

We are allocating land for a new East Chelmsford Garden Community. This is centred on Hammonds Farm, to the east of the A12 and north of the A414 Maldon Road.

New homes including affordable	3,000 (plus 1,500 homes post 2041), 20 Traveller Pitches and 13 Travelling Showpeople plots
New employment floorspace	43,000sqm
Supporting infrastructure	Country Park and significant new multi-functional green infrastructure and landscape
	Mixed use centres for food and other shopping, community uses, healthcare provision
	All through school, potential sixth form centre, three primary schools, six early years and childcare nurseries
	New access junction from A414 (shared with 16b); pedestrian and cycle connections; mobility hubs and bus transport; safe pedestrian/cycle access routes under and over the A12, including to Park and Ride site and Beaulieu Park Rail Station
Historic and natural environment	Preserve the Conservation Areas and listed buildings Protect and retain the protected lanes and reinstate historic landscape features
	Conserve Local Wildlife Sites, Nature Reserves, ancient woodlands and SSSI
	Provide sustainable drainage and flood risk management
	Provide a minimum of 20% biodiversity net gain

High quality garden community development will be provided through Garden City Principles. These include:

- community and stakeholder involvement in design and delivery with long-term governance and stewardship arrangements
- meeting the housing needs of all local people
- providing integrated and sustainable transport systems



16b – Land adjacent to A12 Junction 18 – Employment Area

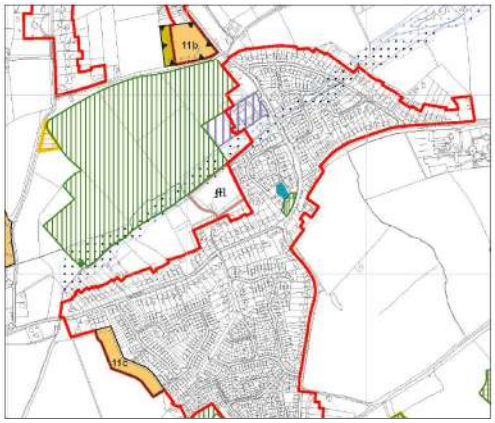
We are allocating a separate area of land for new employment uses adjacent to Junction 8 of the A12, south of the A414.

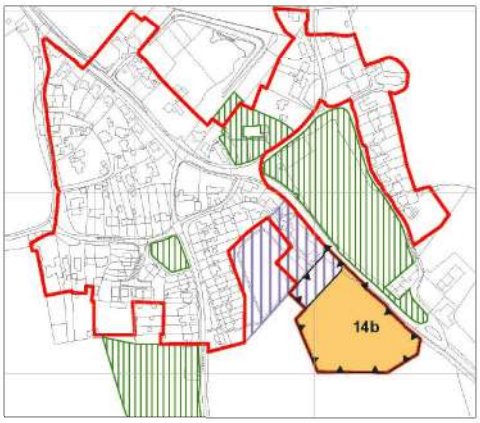
New employment floorspace	43,000sqm for mixed employment types
Supporting infrastructure	New access junction from A414 (shared with 16a) plus multi-user crossings
	Safe pedestrian/cycle access connections including to Park and Ride site, Hammonds Farm, bus stops and Danbury
Historic and natural environment	Preserve Danbury Conservation Area
	Retain boundary trees, plant new trees and extensive landscape buffers

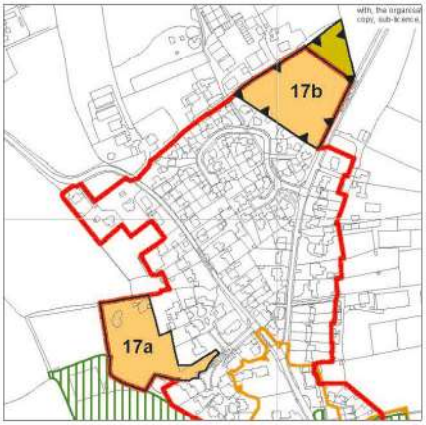
Proposals for Villages

Limited development is proposed in some villages including Bicknacre, Ford End, East Hanningfield, Boreham and Boyton Cross.

We aim to address the Government's requirement to allocate some smaller sites which can be built earlier in the Local Plan period and give smaller development companies the opportunity to build locally. Bicknacre, Ford End and East Hanningfield have primary schools and community facilities, making them suitable for small scale development, which will include affordable homes.

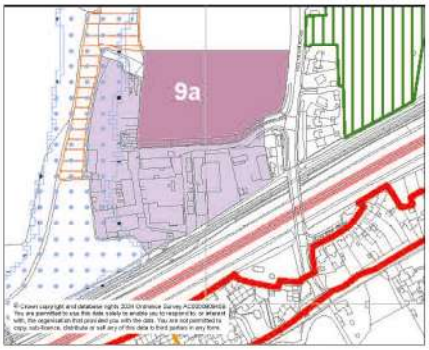


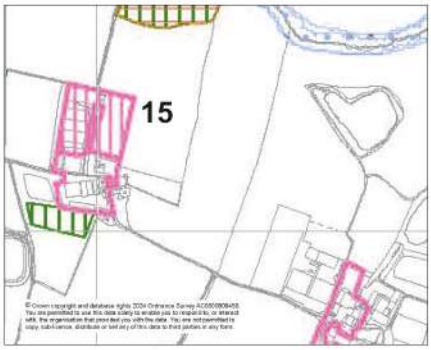




Village	Site	Proposal
Bicknacre	11b Land at Kingsgate, Bicknacre Road	Around 20 homes
	11c Land West of Barbrook Way	Around 20 homes
Ford End	14b Land South of Ford End Primary School	Around 20 homes
East Hanningfield	17a Land North of Abbey Fields	Around 11 homes
	17b Land East of Highfields Mead	Around 20 homes

We also propose to expand two employment sites at Little Boyton Hall Farm, Boyton Cross and Waltham Road, Boreham. Expansion of these well-established employment sites will provide rural employment opportunities and support the sustainable growth and expansion of business in rural areas.





Site	Proposal
9a Waltham Road Employment Area, Boreham	3,500sqm B2/B8 use (general industrial, and storage and distribution)
15 Little Boyton Hall Farm Rural Employment Area, Boyton Cross	6,000sqm B2/B8 use (general industrial, and storage and distribution)

Changes and other consultations

The Pre-Submission Local Plan includes changes made following the Preferred Options consultation in 2024, as summarised below:

- Minor changes to the supporting text for Strategic Priorities, Vision and Spatial Principles
- Changes to strategic policies S4, S9, S6 and S7
- Deletion of Kay Metzeler site, Brook Street (Site 1x) which is longer available for housing development; and Land west of 20 Back Lane, Ford End (Site 14a) as it is no longer considered suitable
- Allocation of a new housing site at Andrews Place, West of Rainsford Lane (Site 1cc)
- Increased capacity of the Meadows Shopping Centre allocation (Site 1w)
- Limited changes to development management policies, the Draft Policies Map and glossary.

The Pre-Submission Local Plan has also been updated to:

- Provide greater clarification and consistency
- Respond to discussions with Duty to Co-operate bodies and infrastructure providers
- Reflect new evidence studies including an updated Infrastructure Delivery Plan, Strategic Housing Needs Assessment, Archaeology Assessment, Open Space Study and Local Wildlife Sites Review, along with housing data and planning permissions
- Reference the housing numbers and transitional arrangements for the progression of Local Plans at an advanced stage of preparation.

Other consultations: Integrated Impact Assessment (IIA)

The Local Plan is subject to an ongoing process of assessing its proposals against a sustainability framework. This covers the potential environmental, social, economic and health performance of the Pre-Submission Local Plan and any reasonable alternative approaches.

Other consultations: Co-Living Housing Planning Advice Note

This provides new practical guidance to potential promoters or developers of co-living housing in Chelmsford, to ensure they meet the Council's expectations.

Other consultations: Consultation Draft Planning Obligations Supplementary Planning Document

This sets out how the Council will seek planning obligations when considering planning applications, including updates to the 2021 published version.

Have your say

Find out more

View the consultation documents on:

- our specially designed consultation portal **www.chelmsford.gov.uk/planningpolicyconsult**
- on our website **www.chelmsford.gov.uk/lp-review**

The consultation documents are:

- Pre-Submission (Regulation 19) Local Plan
- Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment

Visit one of our exhibitions

Thursday 27 February	Council Chamber, Civic Centre	6pm – 8pm
Friday 28 February	Council Chamber, Civic Centre	2pm – 4pm
Saturday 1 March	Council Chamber, Civic Centre	10am – 12noon
Monday 24 February to Sunday 2 March	High Chelmer Shopping Centre (unstaffed)	7am – 6.30pm
Thursday 13 February to Tuesday 25 February	South Woodham Town Council, Champions Manor Hall, Hullbridge Road, SWF (unstaffed)	9am – 4pm

How to comment

This consultation is a bit different to the previous stages. The Government asks you to consider whether the Pre-Submission Local Plan is legally compliant and consistent with national policy, known as the 'Tests of Soundness'. There are specific consultation questions based on a suggested model representation form by the Planning Inspector.

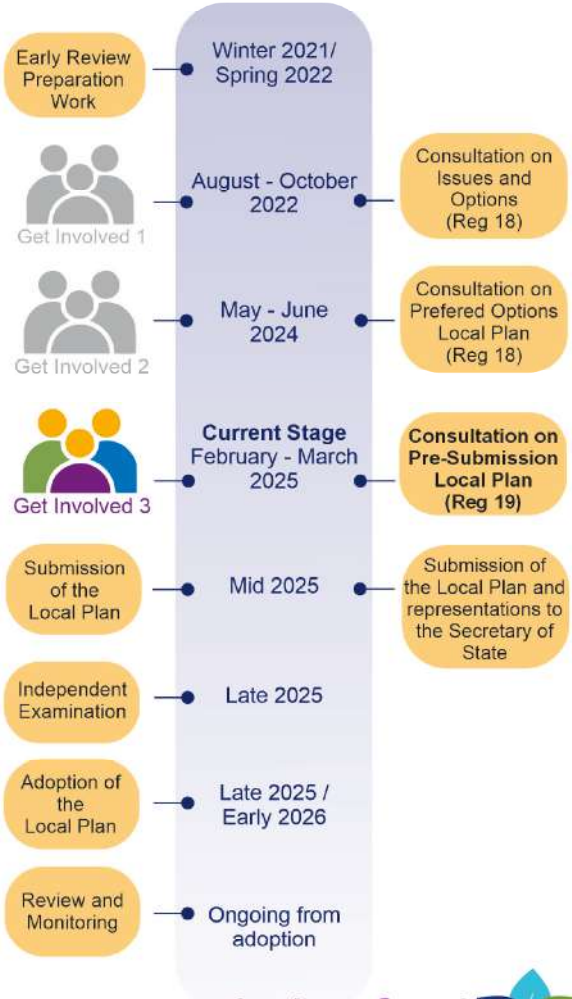
The consultation on the Pre-Submission documents runs for 6 weeks from 10am on Tuesday 4 February 2025 to 4pm on Tuesday 18 March 2025. Comments made before or after these dates cannot be considered.

You can respond:

- Via the Council's consultation portal at **www.chelmsford.gov.uk/planningpolicyconsult.** This is our preferred way to receive comments
- By email or post using a Pre-Submission Representation Form submitted to **planning.policy@chelmsford.gov.uk.** or by post to Spatial Planning Services, Chelmsford City Council, Duke Street, Chelmsford, CM1 1JE

Representation forms are available online at **www.chelmsford.gov.uk/lp-review** or on request.

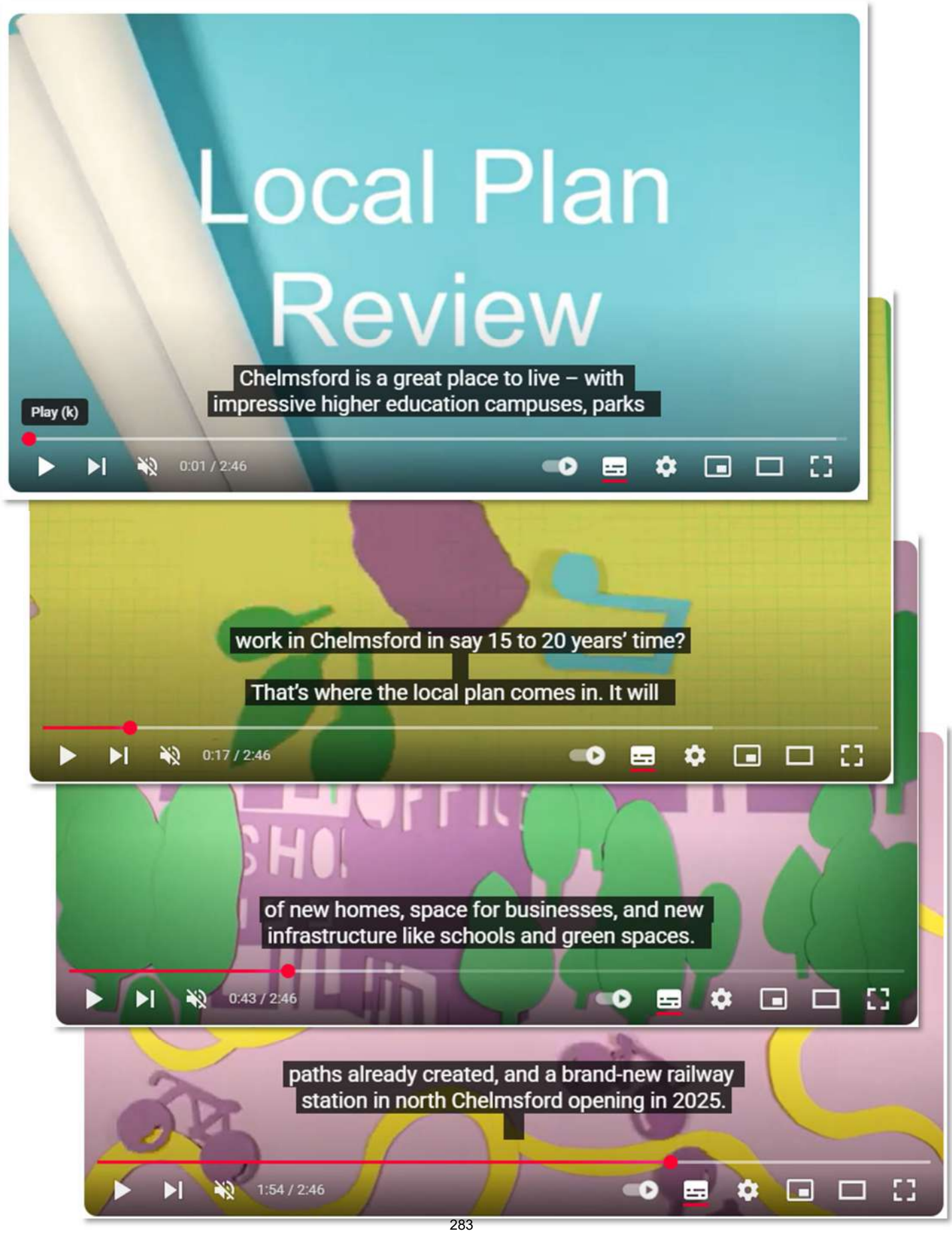
Next Steps
All responses will be submitted to the Planning Inspector, alongside the Pre-Submission Local Plan and evidence base. The Council will produce a summary of the main issues raised in the consultation responses for the Inspector and publish this online.



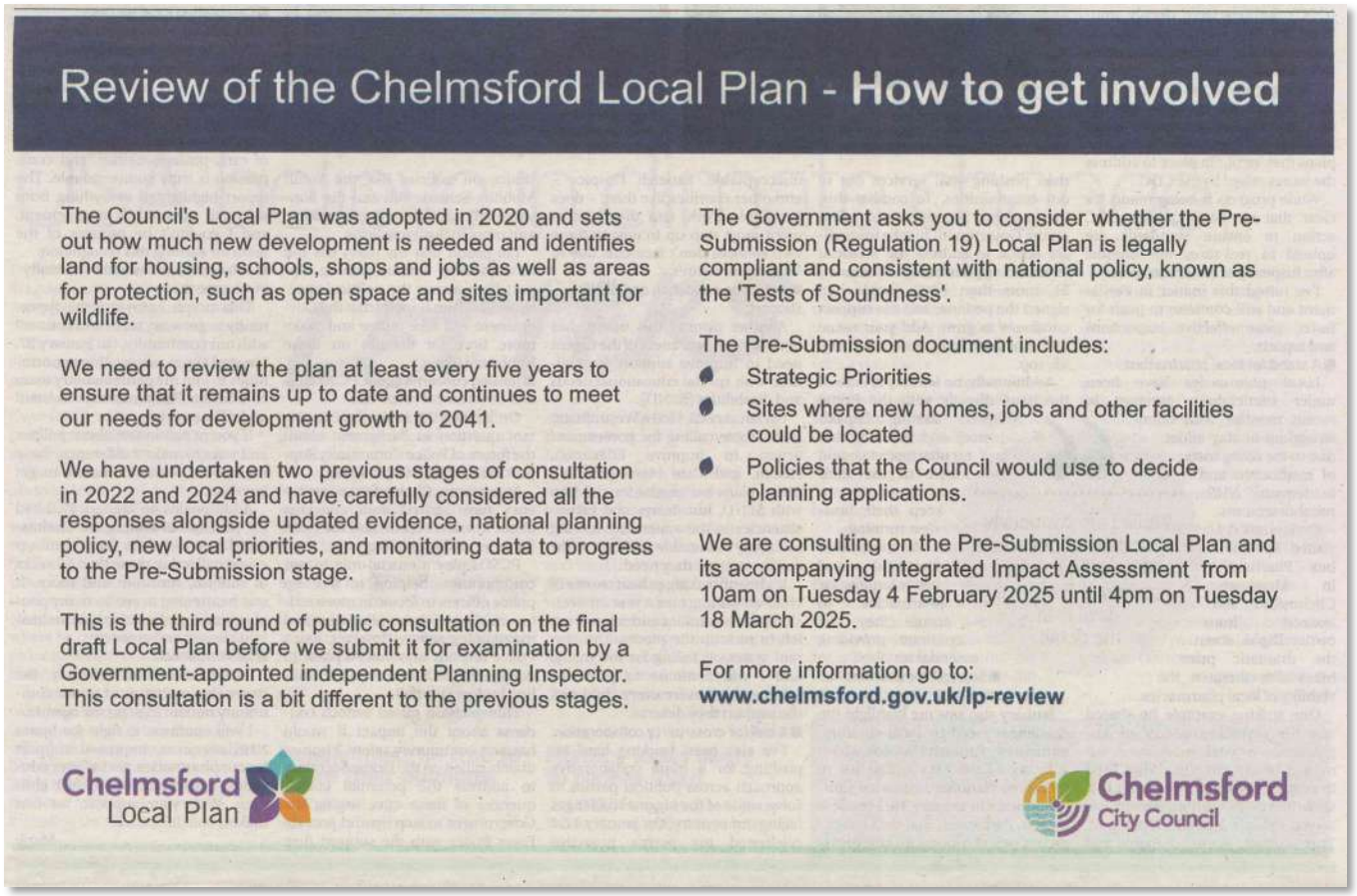
Chelmsford Local Plan

Local Plan Video: https://youtu.be/ZGpTRMhDIhw

Click on the link, or copy and paste into your browser, to view the consultation



Essex Chronicle Advert 06/02/2025



Review of the Chelmsford Local Plan - **How to get involved**

The Council's Local Plan was adopted in 2020 and sets out how much new development is needed and identifies land for housing, schools, shops and jobs as well as areas for protection, such as open space and sites important for wildlife.

We need to review the plan at least every five years to ensure that it remains up to date and continues to meet our needs for development growth to 2041.

We have undertaken two previous stages of consultation in 2022 and 2024 and have carefully considered all the responses alongside updated evidence, national planning policy, new local priorities, and monitoring data to progress to the Pre-Submission stage.

This is the third round of public consultation on the final draft Local Plan before we submit it for examination by a Government-appointed independent Planning Inspector. This consultation is a bit different to the previous stages.

The Government asks you to consider whether the Pre-Submission (Regulation 19) Local Plan is legally compliant and consistent with national policy, known as the 'Tests of Soundness'.

The Pre-Submission document includes:

- Strategic Priorities
- Sites where new homes, jobs and other facilities could be located
- Policies that the Council would use to decide planning applications.

We are consulting on the Pre-Submission Local Plan and its accompanying Integrated Impact Assessment from 10am on Tuesday 4 February 2025 until 4pm on Tuesday 18 March 2025.

For more information go to:
www.chelmsford.gov.uk/lp-review

Chelmsford Local Plan

Chelmsford City Council

Posters were sent to nearly 140 locations in including libraries, local shops, medical centres, and churches

Civic Centre Duke Street
Chelmsford Essex CM1 1JE

Telephone: 01245 606330
Date: 4 February 2025

Dear Sir/Madam,

Poster to promote public consultation on the review of the Chelmsford Local Plan

Chelmsford City Council is reviewing its adopted Local Plan. The Local Plan shapes future growth and development across Chelmsford City Council's area. It sets out a positive vision, identifies where and how new development should take place in the future as well as areas for protection. We adopted our current Local Plan in May 2020. We need to review the plan at least every five years to make sure it remains up to date and meets the changing needs for development growth to 2041.

The next stage in the Review of the Chelmsford Local Plan is to consult on the Pre-Submission (Regulation 19) Local Plan. The consultation is open for your comments from **10am on Tuesday 4 February 2025 to 4pm on Tuesday 18 March 2025.**

An A3 poster which promotes the consultation is enclosed. We would be grateful if this could be displayed in a public place until 18 March 2025.

If you have any queries or would like more information on the review of the Local Plan, please visit www.chelmsford.gov.uk/lp-review, email planning.policy@chelmsford.gov.uk or telephone (01245) 606330.

Yours faithfully,

Jeremy Potter

Spatial Planning Services Manager

Review of Chelmsford Local Plan – **How to get involved**

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This is the third round of public consultation on the final draft Local Plan before we submit it for examination by a Government-appointed independent Planning Inspector. This consultation is a bit different to the previous stages. The Government asks you to consider whether the Pre-Submission (Regulation 19) Local Plan is legally compliant and consistent with national policy, known as the 'Tests of Soundness'.

The Pre-Submission document includes:

- Strategic Priorities
- Sites where new homes, jobs and other facilities could be located
- Policies that the council would use to decide planning applications.

We are consulting on the Pre-Submission Local Plan and its accompanying Integrated Impact Assessment from 10am on Tuesday 4 February 2025 until 4pm on Tuesday 18 March 2025.

Read and comment on the documents at **www.chelmsford.gov.uk/planningpolicyconsult.**

They will also be available to read during normal opening hours at the Council's Customer Service Centre in Chelmsford.

We will also be holding in-person exhibitions at the Civic Centre. These exhibitions will provide an opportunity for you to find out more and discuss the consultation with a Planning Officer.

Visit an exhibition:

Thursday 27th February 2025	Civic Centre	6pm - 8pm
Friday 28th February 2025	Civic Centre	2pm - 4pm
Saturday 1st March 2025	Civic Centre	10am - 12pm

Find out more at **www.chelmsford.gov.uk/lp-review,** telephone (01245) 606330 or email **planning.policy@chelmsford.gov.uk**

Chelmsford Local Plan

Chelmsford City Council

Site notices were posted at 15 new allocation sites – examples:



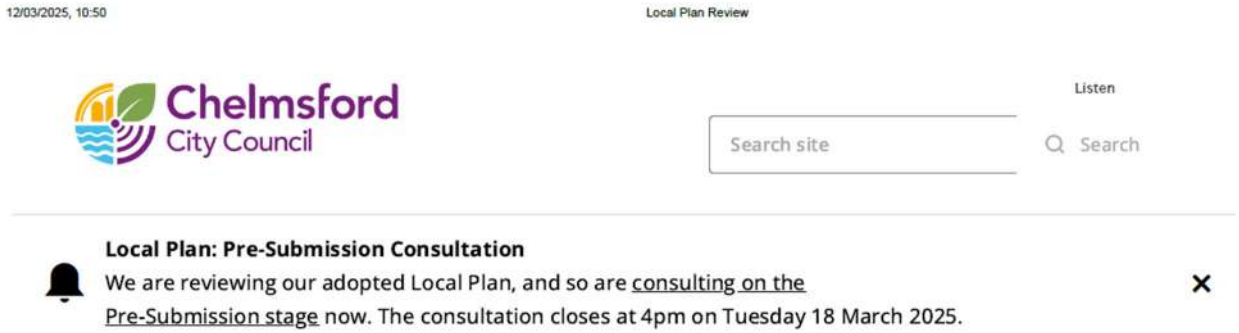




Staff added an **e-mail banner** to their accounts – and the **Website also carried a banner** during the consultation







Chelmsford Local Plan

Local Plan Review Newsletter

NUMBER 3 February 2025

What is a Local Plan?

Chelmsford's Local Plan shapes future growth and development in the City Council's area. It sets out a positive vision, identifies where and how new development should take place in the future as well as areas and land uses that will be protected.

Why are we reviewing the adopted Chelmsford Local Plan?

We adopted our current Local Plan in May 2020 and good progress is being made with implementing it. Government requirements mean we must provide more homes, so we need to review the plan at least every five years to ensure that it remains up to date and continues to meet our needs for development growth to 2041. If the Local Plan becomes out of date, the Council could have very little influence over the location of new development and supporting infrastructure such as employment opportunities, new schools, healthcare provision and upgraded transport infrastructure. Our aim is to get the right type of development in the right places to meet the growing needs of local people and businesses while protecting our environment.

What stage is the review at?

This is the third, and final round of public consultation on the final draft Local Plan before we submit it for examination by a Government-appointed independent Planning Inspector. This is called the Pre-Submission stage. Many people and organisations commented on the Issues and Options consultation in 2022 and the Preferred Options consultation in 2024. All the comments to the previous consultations have been carefully considered and used to progress the Local Plan alongside updated evidence base, national planning policy, new local priorities, and monitoring data.

In response to the consultation we have made a number of changes. 'You Said We Did' feedback reports and the evidence base of technical studies can be read on our website: **www.chelmsford.gov.uk/lp-review**

The Pre-Submission document sets out the Council's final policies including site specific land allocations for new housing, employment and other uses, as well as areas and places for protection.

This consultation is a bit different to the previous stages. The Government asks you to consider whether the Pre-Submission document is legally compliant and consistent with national policy, known as the 'Tests of Soundness'. There are specific consultation questions based on a suggested model representation form by the Planning Inspector.



New Development: Where and how much?

The Pre-Submission Local Plan follows the approach in the adopted Local Plan and previous Preferred Options Consultation Document by continuing to focus new housing and employment growth to the most sustainable locations in three Growth Areas. Site allocations in the adopted plan which are not yet built are carried forward in the Pre-Submission plan.

Many of these sites are now coming forward, with masterplans being approved and planning applications decided or in progress and some sites have started building.

To meet additional growth needs to 2041 it is estimated that we need to allocate new sites for around 4,233 new homes, and around 162,646 sqm of new employment floorspace. This is in addition to the new homes in the adopted Local Plan. To accommodate this, we have reviewed the Spatial Strategy and are allocating new development sites and expanding some existing allocations. The Spatial Strategy (Policy S7) shown in the Pre-Submission Local Plan has been informed by the outcomes of the previous consultations and further evidence. **We are not considering growth in the Green Belt.**



Central and Urban Chelmsford

Continued focus on strengthening the city as a centre for housing, employment and retail. Two existing allocations carried forward to the West and East of Chelmsford maximise cycling and walking opportunities into the City Centre.

1 Previously developed sites in Chelmsford Urban Area
- 3,013 homes (of which around 1,140 are on new allocations such as Meadows Shopping Centre and Car Park, Chelmer Waterside and Andrews Place)
- 4,000sqm employment/business space

2 West Chelmsford
- 880 homes
- 5 Travelling Showpeople Plots
- Primary school and nursery
- Neighbourhood Centre

3a-3d East of Chelmsford
- 3a Manor Farm: 360 homes
- 3b Land North of Maldon Road: 5,000sqm Office/Business Park
- 3c Land South of Maldon Road: 109 homes
- 3d Land North of Maldon Road: 65 homes
- Country Park
- New pedestrian and cycle bridge to Sandford Mill

4 Land North of Galleywood Reservoir
- 24 homes

5 Land surrounding Telephone Exchange, Ongar Road, Writtle
- 25 homes

North Chelmsford

North Chelmsford (Chelmsford Garden Community) will continue as a key area for new neighbourhoods and employment opportunities. New smaller allocation at Ford End and extension to two existing employment areas. Existing allocations carried forward at Great Leighs and Broomfield.

6 North East Chelmsford (Chelmsford Garden Community)
- 5,569 homes (plus 680 homes post 2041)
- 10 Gypsy and Traveller Pitches
- 56,946sqm Office/Business Park
- Country Park
- Chelmsford North East Bypass
- 4 Neighbourhood Centres
- 1 all-through school
- 3 primary schools with 4 nurseries

7a-7c Great Leighs
- 7a Land at Moulsham Hall: 750 homes and 5 Travelling Showpeople Plots
- 7b Land East of London Road: 250 homes
- 7c Land North and South of Banters Lane: 100 homes
- Neighbourhood Centre
- Primary school with nursery

8 North of Broomfield
- 512 homes
- Neighbourhood Centre
- Nursery

9a Waltham Road Employment Area
- 3,500sqm B2/B8 Use

14b Ford End
- 14b Land South of Ford End Primary School: 20 homes

15 Little Boyton Hall Farm Rural Employment Area
- 6,000sqm employment/business space

South and East Chelmsford

Proposals include a new garden community at East Chelmsford (Hammonds Farm), and a strategic employment site. New smaller allocations in Bicknacre and East Hanningfield. Existing allocations carried forward at South Woodham Ferrers, Bicknacre and Danbury.

10 North of South Woodham Ferrers
- 1,220 homes
- 5 Travelling Showpeople Plots
- 1,200sqm Business Space
- Neighbourhood Centre
- 2 nurseries and potential primary school

11b & 11c Bicknacre
- 11b Land at Kingsgate: 20 homes
- 11c Land West of Barbrook Way: 20 homes

12 St Giles, Bicknacre
- 32 homes

13 Danbury
- 100 homes

16a East Chelmsford Garden Community (Hammonds Farm)
- 3,000 homes to 2041 (plus 1,500 homes post 2041)
- 20 Gypsy and Traveller Pitches
- 13 Travelling Showpeople Plots
- 43,000sqm Business Space
- Country Park
- Neighbourhood Centres
- 1 co-located primary and secondary school
- 2 primary schools and nursery
- 3 nurseries

16b Land adjacent to A12 Junction 18
- 43,000sqm Business Space

17a & 17b East Hanningfield
- 17a Land North of Abbey Fields: 11 homes

17b Land East of Highfield Mead: 20 homes

Highlighted text: New development allocations in the Pre-Submission Local Plan.

Local Plan policies

We have included new and updated policies in the Pre-Submission Local Plan. Topics include housing, economy, environment, health and wellbeing, travel and transport, heritage, and design. We have not fundamentally changed the general approach in the adopted Local Plan, but have used updated information, previous consultation responses and addressed some of our major challenges including acting on the climate emergency, responding to the housing crisis and strengthening community ties.

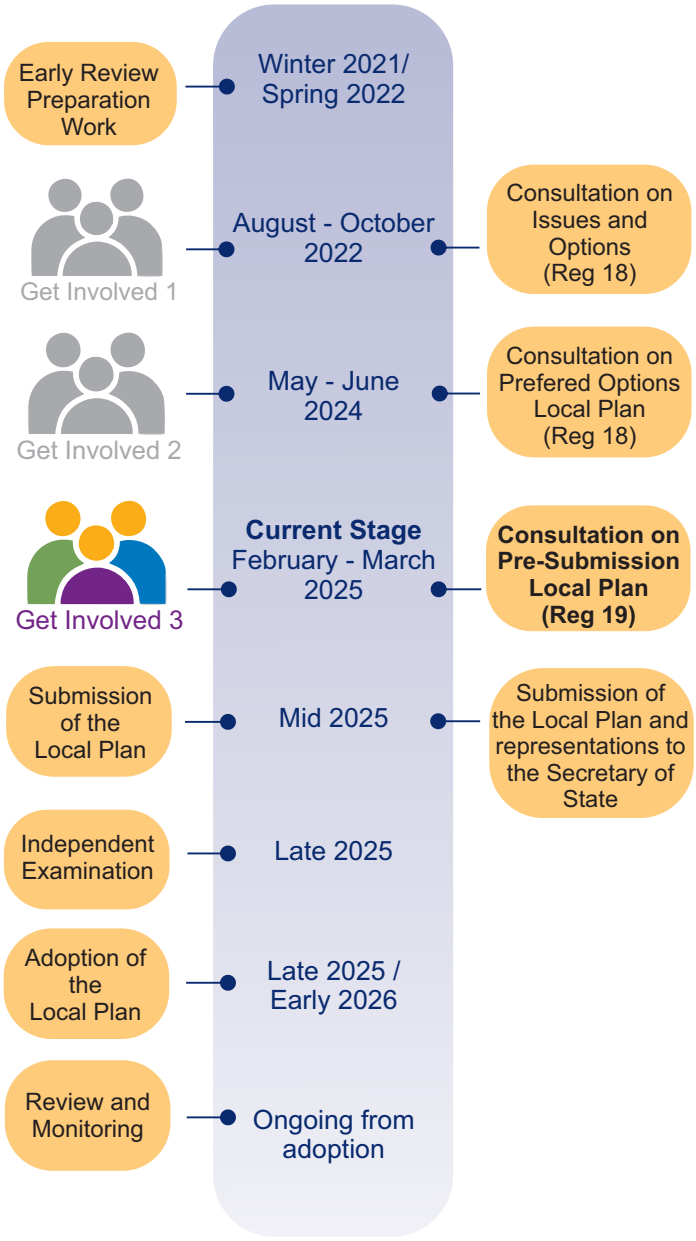
What is the Integrated Impact Assessment (IIA)?

The IIA identifies the key sustainability issues for the Review of the Local Plan. These feed into a framework against which the proposals have been assessed. It covers the potential environmental, social, economic and health performance of the Local Plan and any reasonable alternatives. The IIA includes:

- Sustainability Appraisal (SA)
- Strategic Environmental Assessment (SEA)
- Habitats Regulations Assessment (HRA)
- Health Impact Assessment (HIA)
- Equality Impact Assessment (EqIA)

We will be consulting on the IIA as part of the Pre-Submission consultation.

What is the Local Plan timetable?



Where can I view the consultation documents?

The consultation documents will be available to view and comment on the Council's planning policy consultation portal **www.chelmsford.gov.uk/planningpolicyconsult.**

We will also be holding in-person exhibitions in the Council Chamber at the Civic Centre, Duke Street. These exhibitions will provide an opportunity for you to find out more and discuss the consultation with a Planning Officer. The exhibitions will be on:

- Thursday 27th February 6pm- 8pm
- Friday 28th February 2pm - 4pm
- Saturday 1st March 10am-12noon

Consultation dates and how do I respond?

The consultation on the Pre-Submission documents runs for 6 weeks from 10am on Tuesday 4 February 2025 to 4pm on Tuesday 18 March 2025. Comments made before or after these dates cannot be considered.

You can respond:

- Via the Council's consultation portal at **www.chelmsford.gov.uk/planningpolicyconsult.** This is our preferred way to receive comments
- By email or post using a Pre-Submission Representation Form submitted to **planning.policy@chelmsford.gov.uk.** or by post to Spatial Planning Services, Chelmsford City Council, Duke Street, Chelmsford, CM1 1JE

Representation forms are available online at **www.chelmsford.gov.uk/lp-review** or on request.

Full details on how to make your comments are available online at **www.chelmsford.gov.uk/lp-review.**

Comments to the 2022 and 2024 consultations are not sent to the Planning Inspector so you will need to make a new representation if you still have relevant comments to make.

Next Steps
All responses will be submitted to the Planning Inspector, alongside the Pre-Submission Local Plan and evidence base. The Council will produce a summary of the main issues raised in the consultation responses for the Inspector and publish this online.

Chelmsford City Council

Chelmsford Local Plan Pre-Submission (Regulation 19) Document Parish/Town Council Information Pack
Planning Policy, February 2025

Part A - General information that is relevant to all Parish / Town Councils

Review of Chelmsford's Local Plan

The Council's Local Plan was adopted in 2020 and it guides growth and development across Chelmsford City Council's area to 2036.

We need to review the plan at least every five years to ensure that it remains up to date and continues to meet our needs for development growth to 2041. This includes new homes, employment opportunities and facilities for local people such as new schools, healthcare provision and upgraded transport infrastructure.

We are currently at the Pre-Submission stage in the plan review process. Many people and organisations commented on the first Issues and Options stage consultation in 2022 and the second Preferred Options consultation in 2024. All the responses have been carefully considered and used to progress to the Pre-Submission (Regulation 19) Local Plan stage alongside an updated plan evidence base, national planning policy, local City Council priorities and monitoring data.

The consultation on the Pre-Submission documents runs for a period of six weeks from 10am on Tuesday 4 February 2025 to 4pm on Tuesday 18 March 2025. Communities can find out more at www.chelmsford.gov.uk/lp-review. This consultation is the last of three formal stages in the preparation of the review of the adopted Chelmsford Local Plan. We are consulting on the:

- Chelmsford Local Plan – Pre-Submission (Regulation 19) Document, and
- Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment.

In addition, the Council is also consulting on the:

- Co-Living Housing Planning Advice Note, and
- Consultation Draft Planning Obligations Supplementary Planning Document (SPD).

Chelmsford Local Plan – Pre-Submission (Regulation 19) Document

The Chelmsford Local Plan – Pre-Submission (Regulation 19) Document is a full draft local plan. It includes updated and new Strategic Priorities, updated and new site allocations for new homes and employment, and policies that will be used to decide planning applications. The aim is to get the right type of development in the right places to meet the growing needs of local people and businesses, whilst protecting our environment.

The Chelmsford Local Plan – Pre-Submission (Regulation 19) Document follows the approach in the adopted Local Plan by continuing to focus new housing and employment growth to the most sustainable locations in three Growth Areas. The existing site allocations in the adopted plan which are not yet built are carried forward. Many of these sites are now coming forward, with masterplans being approved and planning applications decided or in progress. Some sites are being developed now.

This consultation is a different to the previous stages. The Government asks you to consider whether the Pre-Submission Local Plan is legally compliant and consistent with national policy, known as the 'Tests of Soundness'. There are specific consultation questions based on a suggested model representation form by the Planning Inspector.

Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment

The adopted Local Plan was developed alongside a comprehensive Sustainability Appraisal (SA) and Habitats Regulations Appraisal (HRA) process. For this review process other aspects of sustainable development are being considered in an Integrated Impact Assessment (IIA).

The Review of the Adopted Chelmsford Local Plan: Pre-Submission IIA assesses the Pre-Submission (Regulation 19) Local Plan against a range of social, environmental, health and economic indicators and helps to identify all the likely significant effects. It advises on ways in which any adverse effects could be avoided, reduced or mitigated or how any positive effects could be maximised. This helps to ensure that the policies in the Pre-Submission (Regulation 19) Local Plan are promoting sustainable development.

Other consultations: Co-Living Housing Planning Advice Note

This provides new practical guidance to potential promoters or developers of co-living housing in Chelmsford, to ensure they meet the Council's expectations.

Other consultations: Consultation Draft Planning Obligations Supplementary Planning Document (SPD)

This sets out how the Council will seek planning obligations when considering planning applications, including updates to the 2021 published version.

Where to view the consultation documents

You can read the consultation documents in the following ways:

- On the Council's Consultation Portal at www.chelmsford.gov.uk/planningpolicyconsult. This system also allows you to submit comments to the consultations
- On the Council's website alongside the Local Plan evidence base documents at www.chelmsford.gov.uk/lp-review
- At the Chelmsford City Council Customer Service Centre, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford CM1 1JE (10am to 4pm Monday to Friday).
- At the following drop-in public exhibitions. These will provide an opportunity to meet an officer face-to-face unless otherwise stated.

Location	Date	Time
Council Chamber, Civic Centre, Duke Street, Chelmsford, CM1 1JE	Thursday 27 February Friday 28 February Saturday 1 March	6pm - 8pm 2pm - 4pm 10am - 12noon
High Chelmer Shopping Centre, Exchange Way, Chelmsford, CM1 1XB	Monday 24 February to Sunday 2 March	Unstaffed exhibition panels displayed all-day during shopping centre opening hours
South Woodham Town Council, Champions Manor Hall, Hullbridge Road, South Woodham Ferrers, CM3 5LJ	Thursday 13 February to Tuesday 25 February	Unstaffed exhibition panels displayed 9am - 4pm (except weekends)

Please check our website www.chelmsford.gov.uk/lp-review for any updates before making your journey.

How to comment

You can comment on the consultation documents in the following ways:

Online Consultation Portal:
Go to: www.chelmsford.gov.uk/planningpolicyconsult where you can:

- Read the consultation documents
- Make your comments via the specially designed representation form
- Sign up for alerts to feedback reports and future consultations

This is our preferred means of receiving comments as it ensures that your comments are recorded accurately and are processed quickly.

If you have not used this system before or have any difficulties logging in, please see our guidance notes at:www.chelmsford.gov.uk/lp-portal-guide or call us on (01245) 606330.

In writing:
If you prefer to send comments in writing, please fill in the relevant specially designed representation forms for each consultation event.

Local Plan representation forms cover the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document and the Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment consultations.

The Local Plan representation forms can be downloaded at www.chelmsford.gov.uk/lp-review. Paper copies of these representation forms for are also available from Chelmsford City Council's Customer Service Centre (details above) or on request by telephoning (01245) 606330 or emailing planning.policy@chelmsford.gov.uk

Forms can be returned:

- By e-mail to planning.policy@chelmsford.gov.uk
- By post to Planning Policy, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE
- By hand to Chelmsford City Council Customer Service Centre (details above).

The use of the Local Plan representation forms is strongly recommended as this will ensure that comments are related to the matters relevant to the subsequent Independent Examination by a Planning Inspector.

If you do not have access to a computer, you can request paper copies. A charge will be made to cover printing and postage costs.

If you have difficulties making representations by e-mail or post due to a disability, please call us (01245) 606330.

Please note that any representations must be received by the Council no later than 4pm on Tuesday 18 March 2025. We are unable to accept anonymous representations, and any comments received after the closing date cannot be accepted.

Part B – Optional information by Parish/Town Council area

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in the Unparished Area of Chelmsford?

The plan identifies site allocations in Chelmsford's Urban Area including the City Centre for new employment and around 3,013 new homes. This comprises 20 sites carried forward from the adopted Local Plan some of which have increased numbers

of homes as justified by the plan evidence base (Sites 1a – 1b, 1d – 1i and 1k – 1v). There are also six new site allocations:

- Site 1w Meadows/Meadows Surface Car Park for around 757 new homes
- Site 1y Land between Hoffmans Way and Brook Street (Marriage's Mill) for around 100 new homes
- Site 1z Granary Car Park, Victoria Road for around 50 new homes
- Site 1aa Coval Lane Car Park for around 40 new homes
- Site 1bb Glebe Road Car Park for around 12 new homes
- Site 1cc Andrews Place for 250 new affordable homes (183 net new affordable homes)

See part C for more details of site allocations.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Boreham Parish?

The plan allocates two new sites:

- Site 9a Waltham Road Employment Area. This is identified for around 3,500sqm of new employment land as an expansion of the existing industrial area
- Site 16a East Chelmsford Garden Community (Hammonds Farm) lies adjacent to Boreham Parish to the south but proposals for a new connection to Junction 19 of the A12 and a small portion of the country park lie within Boreham Parish. Most of the wider site is beyond Boreham Parish. The whole site is identified for around 3,000 new homes, 43,000 sqm of employment floorspace and two Gypsy and Traveller sites, each for 10 pitches in the period up to 2041 and 13 Travelling Showpeople plots alongside supporting infrastructure including transport, new schools and early years and childcare provision, health care, utility services and green infrastructure together with retail, community, employment, leisure uses and a country park. The site is also considered able to provide a further 1,500 new homes in the period beyond 2041.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Broomfield Parish?

The plan carries forward the existing allocation of Land North of Broomfield (Site 8) in the adopted Local Plan but with an increased number of homes as justified by the planning application process. It is identified for 512 new homes alongside supporting infrastructure including a new neighbourhood centre. This site partially lies within Broomfield Parish.

No additional housing or employment sites are identified in Broomfield Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Chelmer Village Parish?

The plan allocates a new East Chelmsford Garden Community (Hammonds Farm) (Site 16a) which lies adjacent to Chelmer Village Parish to the east of the A12 but proposals for a new connection to Junction 19 of the A12 within Chelmer Village Parish. Most of the wider site is beyond Chelmer Village Parish. The whole site is identified for around 3,000 new homes, 43,000 sqm of employment floorspace and two Gypsy and Traveller sites, each for 10 pitches in the period up to 2041 and 13 Travelling Showpeople plots alongside supporting infrastructure including transport, new schools and early years and childcare provision, health care, utility services and green infrastructure together with retail, community, employment, leisure uses and a country park. The site is also considered able to provide a further 1,500 new homes in the period beyond 2041.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Chelmsford Garden Community Parish?

The plan carries forward the existing allocation of North East Chelmsford (Chelmsford Garden Community) (Site 6). It identifies 6,569 new homes in the period to 2041. It also allocates around 56,946sqm of employment land and a Gypsy and Traveller site for 10 pitches. The amount and type of proposed development is greater than that allocated in the adopted Local Plan as justified by an approved masterplan (Development Framework Document). The development will be supported by new infrastructure including transport, new schools and early years and childcare provision, health care, utility services and green infrastructure schools, a country park/destination parks and mixed use village centres. The site is also considered able to provide a further 681 new homes beyond 2041.

No additional housing or employment sites are identified in Chelmsford Garden Community Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Chignal Parish?

No housing or employment sites are identified in Chignal Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Danbury Parish?

The plan allocates a new East Chelmsford Garden Community (Hammonds Farm) (Site 16a) which lies to the west of Danbury Parish except for land identified for conservation and strategic landscape enhancement. Most of the wider site is beyond Danbury Parish. The whole site is identified for around 3,000 new homes, 43,000 sqm of employment floorspace and two Gypsy and Traveller sites, each for 10

pitches in the period up to 2041 and 13 Travelling Showpeople plots alongside supporting infrastructure including transport, new schools and early years and childcare provision, health care, utility services and green infrastructure together with retail, community, employment, leisure uses and a country park. The site is also considered able to provide a further 1,500 new homes in the period beyond 2041.

The plans also carries forward the existing allocation of 100 new homes from the adopted Local Plan (Site 13). The location of these have been determined through the 'made' Danbury Neighbourhood Plan and include five sites which are shown on the Draft Policies Map.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in East Hanningfield Parish?

The plan identifies two new smaller site allocations in East Hanningfield – Site 17a Land North of Abbey Fields for around 11 homes and Site 17b Land East of Highfields Mead for around 20 homes. These sites are no larger than 1 hectare in size and the site boundaries are defined on the Draft Policies Map.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Galleywood Parish?

The plan carries forward the existing allocation of land north of Galleywood Reservoir for 24 new affordable homes (Site 4) but with an increased number of homes as justified by the planning application process.

No additional housing or employment sites are identified in Galleywood Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Good Easter Parish?

No housing or employment sites are identified in Good Easter Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Great & Little Leighs Parish?

The plan carries forward three existing site allocations:

- Site 7a Land at Moulsham Hall for around 750 new homes and a Travelling Showpeople site for 5 plots alongside supporting infrastructure including a new primary school and neighbourhood centre. The site is also allocated for an increased number of homes as justified by the planning application process. The Travelling Showpeople site is also shown in a new location to the north of Great Leighs village between the A131 and London Road

- Site 7b Land East of London Road for around 250 new specialist residential homes for older persons to include affordable housing. The site is also allocated for an increased number of homes as justified by the planning application process.
- Site 7c Land North and South of Banters Lane for around 100 new homes.

No additional housing or employment sites are identified in Great & Little Leighs Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Great Baddow Parish?

The plan carries forward the existing allocation of East of Chelmsford – Manor Farm (Site 3a) but with an increased number of homes as justified by the planning application process. This site is identified for 360 new homes alongside supporting infrastructure including a new country park.

No additional housing or employment sites are identified in Great Baddow Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Great Waltham Parish?

The plan identifies one small site allocation in Ford End Site 14b Land South of Ford End Primary School for around 20 homes. A new off-road parking area is to be provided for use by Ford End Primary School. The site is no larger than 1 hectare in size and the site boundary is defined on the Draft Policies Map.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Highwood Parish?

No housing or employment sites are identified in Highwood Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Little Baddow Parish?

The plan proposes a new East Chelmsford Garden Community (Hammonds Farm) (Site 16a) which predominately lies within Little Baddow and Sandon Parishes. The wider site is identified for around 3,000 new homes, 43,000 sqm of employment floorspace and two Gypsy and Traveller sites, each for 10 pitches in the period up to 2041 and 13 Travelling Showpeople plots alongside supporting infrastructure including transport, new schools and early years and childcare provision, health care, utility services and green infrastructure together with retail, community, employment, leisure uses and a country park. The site is also considered able to provide a further 1,500 new homes in the period beyond 2041.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Little Waltham Parish?

The plan carries forward the existing allocation of land North of Broomfield (Site 8) in the adopted Local Plan but with an increased number of homes as justified by the planning application process. It is identified for 512 new homes alongside supporting infrastructure including a new neighbourhood centre. This site is partially within Little Waltham Parish.

No additional housing or employment sites are identified in Little Waltham Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Margaretting Parish?

No housing or employment sites are identified in Margaretting Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Mashbury Parish?

No housing or employment sites are identified in Mashbury Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Pleshey Parish?

No housing or employment sites are identified in Pleshey Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Rettendon Parish?

No housing or employment sites are identified in Rettendon Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Roxwell Parish?

The plan allocates around 6,000sqm of new employment land as an expansion of the existing Little Boyton Hall Farm Rural Employment Area (Site 15).

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Runwell Parish?

No housing or employment site allocations are identified in Runwell Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Sandon Parish?

The plan carries forward three existing site allocations:

- Site 3b East of Chelmsford – Land North of Maldon Road (Employment) for around 5,000sqm of new employment floorspace alongside supporting infrastructure including an early years and childcare nursery
- Site 3c East of Chelmsford – Land South of Maldon Road for 109 new homes. This is an increased number of homes and a new area for SuDS (sustainable drainage system) as justified by the Masterplan process
- Site 3d East of Chelmsford – Land North of Maldon Road (Residential) for 65 new homes. This is an increased number of homes, as justified by the masterplan process.

The plan allocates two new sites:

- A new East Chelmsford Garden Community (Hammonds Farm) (Site 16a) which predominately lies within Sandon and Little Baddow Parishes. The wider site is identified for around 3,000 new homes, 43,000 sqm of employment floorspace and two Gypsy and Traveller sites, each for 10 pitches in the period up to 2041 and 13 Travelling Showpeople plots alongside supporting infrastructure including transport, new schools and early years and childcare provision, health care, utility services and green infrastructure together with retail, community, employment, leisure uses and a country park. The site is also considered able to provide a further 1,500 new homes in the period beyond 2041
- Site 16b Land adjacent to A12 Junction 18 Employment Area. This is identified for around 43,000sqm of new employment land.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in South Hanningfield Parish?

No housing or employment sites are identified in South Hanningfield Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in South Woodham Ferrers?

The consultation document carries forward the existing allocation of North of South Woodham Ferrers (Site 10) but with an increased number of homes and employment as justified by the masterplan process. It is identified for 1,220 new homes, around 1,200sqm of business floorspace and a Travelling Showpeople site for 5 plots alongside supporting infrastructure including new early years and childcare nurseries.

No housing or employment sites are identified in South Woodham Ferrers Parish within the Pre-Submission Local Plan.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Springfield Parish?

No housing or employment sites are identified in Springfield Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Stock Parish?

No housing or employment sites are identified in Stock Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in West Hanningfield Parish?

No housing or employment sites are identified in West Hanningfield Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Woodham Ferrers and Bicknacre Parish?

The plan carries forward one existing allocation in Bicknacre - Site 12 St Giles, Moor Hall Lane for around 32 new units for specialist residential accommodation (SRA). The plan also identifies two new smaller site allocations in Bicknacre – Site 11b Land at Kingsgate, Bicknacre Road and Site 11c Land West of Barbrook Way both for around 20 new homes. The sites are no larger than 1 hectare in size and the site boundaries are defined on the Draft Policies Map.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Writtle Parish?

The plan carries forward two existing allocations:

- Site 2 West Chelmsford but with an increased number of homes as justified by the planning application process. It is identified for 880 new homes and a Travelling Showpeople site for 5 plots alongside supporting infrastructure including a new primary school and neighbourhood centre
- Site 5 Land Surrounding Telephone Exchange, Ongar Road for around 25 new homes. A smaller site boundary is shown on the Draft Policies Map to reflect the land promoted for development.

No additional housing or employment sites are identified in Writtle Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Part C – Chelmsford Local Plan Pre-Submission (Regulation 19) Document - SITE ALLOCATIONS AT A GLANCE

Site No.	Site name	Location	Proposed development	Site Status	Policies Map No.
1a	Chelmer Waterside allocations (CW1a and CW1c-f)	Chelmsford Urban Area	880 homes	In Adopted Local Plan	4
1b	Former St Peter's College, Fox Crescent	Chelmsford Urban Area	185 homes, around 60 extra care independent living accommodation	In Adopted Local Plan	4
1d	Riverside Ice and Leisure Land, Victoria Road	Chelmsford Urban Area	150 homes	In Adopted Local Plan	4
1e	Civic Centre Land, Fairfield Road	Chelmsford Urban Area	100 homes	In Adopted Local Plan	4
1f	Eastwood House Car Park, Glebe Road	Chelmsford Urban Area	197 homes	In Adopted Local Plan	4
1g	Chelmsford Social Club, Springfield Road	Chelmsford Urban Area	29 homes	In Adopted Local Plan	4
1h	Ashby House Car Parks, New Street	Chelmsford Urban Area	80 homes	In Adopted Local Plan	4
1i	Rectory Lane Car Park West	Chelmsford Urban Area	75 homes, potential for student accommodation	In Adopted Local Plan	4
1k	Former Chelmsford Electrical and Car Wash, Brook Street	Chelmsford Urban Area	41 homes	In Adopted Local Plan	4
1l	BT Telephone Exchange, Cottage Place	Chelmsford Urban Area	30 homes	In Adopted Local Plan	4

Site No.	Site name	Location	Proposed development	Site Status	Policies Map No.
1m	Rectory Lane Car Park East	Chelmsford Urban Area	23 homes, potential for student accommodation	In Adopted Local Plan	4
1n	Waterhouse Lane Depot and Nursery	Chelmsford Urban Area	20 homes	In Adopted Local Plan	4
1p	British Legion, New London Road	Chelmsford Urban Area	15 homes	In Adopted Local Plan	4
1q	Rear of 17 to 37 Beach's Drive	Chelmsford Urban Area	18 homes	In Adopted Local Plan	4
1r	Garage Site, St Nazaire Road	Chelmsford Urban Area	12 homes	In Adopted Local Plan	4
1s	Garage Site and Land, Medway Close	Chelmsford Urban Area	6 homes	In Adopted Local Plan	4
1t	Car Park R/O Bellamy Court, Broomfield Road	Chelmsford Urban Area	10 homes	In Adopted Local Plan	4
1v	Railway Sidings, Brook Street	Chelmsford Urban Area	Business or industrial use	In Adopted Local Plan	4
1w	Meadows Shopping Centre and Meadows Surface Car Park	Chelmsford Urban Area	757 homes	New allocation	4
1y	Land between Hoffmans Way and Brook Street (Marriage's Mill)	Chelmsford Urban Area	100 homes	New allocation	4
1z	Granary Car Park, Victoria Road	Chelmsford Urban Area	50 homes	New allocation	4
1aa	Coval Lane Car Park	Chelmsford Urban Area	40 homes	New allocation	4
1bb	Glebe Road Car Park	Chelmsford Urban Area	12 homes	New allocation	4

Site No.	Site name	Location	Proposed development	Site Status	Policies Map No.
1cc	Andrews Place, Land West of Rainsford Lane	Chelmsford Urban Area	250 new affordable homes (183 net new affordable homes)	New allocation	4
2	West Chelmsford	Writtle Parish	880 homes, 5 Travelling Showpeople plots	In Adopted Local Plan	3
3a	East of Chelmsford – Manor Farm	Great Baddow Parish	360 homes	In Adopted Local Plan	3
3b	East of Chelmsford – Land North of Maldon Road (Employment)	Sandon Parish	5,000sqm employment floorspace	In Adopted Local Plan	3
3c	East of Chelmsford – Land South of Maldon Road	Sandon Parish	109 homes	In Adopted Local Plan	3
3d	East of Chelmsford – Land North of Maldon Road (Residential)	Sandon Parish	65 homes	In Adopted Local Plan	3
4	Land North of Galleywood Reservoir	Galleywood Parish	24 homes	In Adopted Local Plan	16
5	Land Surrounding Telephone Exchange, Ongar Road	Writtle Parish	25 homes	In Adopted Local Plan	37
6	North East Chelmsford (Chelmsford Garden Community)	Chelmsford Garden Community Parish	5,569 homes, around 56,946sqm of employment land and Gypsy and Traveller site for 10 serviced pitches. Site is able to provide a further 681 homes beyond 2041	In Adopted Local Plan	3
7a	Great Leighs - Land at Moulsham Hall	Great and Little Leighs Parish	750 homes, 5 Travelling Showpeople plots	In Adopted Local Plan	18
7b	Great Leighs – Land East of London Road	Great and Little Leighs Parish	250 homes including specialist residential homes for older persons	In Adopted Local Plan	18

Site No.	Site name	Location	Proposed development	Site Status	Policies Map No.
7c	Great Leighs – Land North and South of Banters Lane	Great and Little Leighs Parish	100 homes	In Adopted Local Plan	18
8	North of Broomfield	Broomfield/Little Waltham Parish	512 homes	In Adopted Local Plan	10
9a	Waltham Road Employment Area	Boreham Parish	Expansion of existing employment area for 3,500sqm of employment floorspace	New allocation	9
10	North of South Woodham Ferrers	South Woodham Ferrers Parish	1,220 homes, 1,200 sqm business floorspace and 5 Travelling Showpeople plots	In Adopted Local Plan	5
11b	Land at Kingsgate, Bicknacre Road	Woodham Ferrers and Bicknacre Parish	20 homes on a site of up to 1ha	New allocation	8
11c	Land West of Barbrook Way	Woodham Ferrers and Bicknacre Parish	20 homes on a site of up to 1ha	New allocation	8
12	St Giles, Moor Hall Lane	Woodham Ferrers and Bicknacre Parish	32 units of specialist residential accommodation	In Adopted Local Plan	8
13	Danbury	Danbury Parish	100 homes to be allocated through the Danbury Neighbourhood Plan: DNP1-A Land at Sandpit Field, East of Little Fields DNP1-B Land at Tyndales Farm West DNP1-C Ex Play Area, South of Jubilee Rise DNP1-D Danecroft, Woodhill Road DNP1-E Land at Mayes Lane	In Adopted Local Plan	12
14b	Land South of Ford End Primary School	Great Waltham Parish	20 homes on a site of up to 1ha	New allocation	15

Site No.	Site name	Location	Proposed development	Site Status	Policies Map No.
15	Little Boyton Hall Farm Employment Area	Roxwell Parish	Expansion of existing employment area for 6,000sqm of employment floorspace	New allocation	3
16a	East Chelmsford Garden Community (Hammonds Farm)	Boreham, Chelmer Village, Danbury, Little Baddow and Sandon Parishes	3,000 homes, 43,000sqm employment floorspace, two Gypsy and Traveller sites with 10 serviced pitches each and 13 Travelling Showpeople plots. Site is able to provide a further 1,500 homes beyond 2041	New allocation	3
16b	Land adjacent to A12 Junction 18 Employment Area	Sandon Parish	43,000sqm employment floorspace	New allocation	3
17a	Land North of Abbey Fields	East Hanningfield Parish	11 homes on a site of up to 1ha	New allocation	13
17b	Land East of Highfields Mead	East Hanningfield Parish	20 homes on a site of up to 1ha	New allocation	13

Highlighted text = Proposed new development allocations in the review of the Local Plan.

Part D – Pre-Submission Local Plan advert for use in Parish/Town Council newsletters/publications

See attached PDF.

Planning Policy Team, February 2025
Chelmsford City Council
01245 606330
planning.policy@chelmsford.gov.uk

Review of the Chelmsford Local Plan - **How to get involved**

The Council's Local Plan was adopted in 2020 and sets out how much new development is needed and identifies land for housing, schools, shops and jobs as well as areas for protection, such as open space and sites important for wildlife.

We need to review the plan at least every five years to ensure that it remains up to date and continues to meet our needs for development growth to 2041.

We have undertaken two previous stages of consultation in 2022 and 2024 and have carefully considered all the responses alongside updated evidence, national planning policy, new local priorities, and monitoring data to progress to the Pre-Submission stage.

This is the third round of public consultation on the final draft Local Plan before we submit it for examination by a Government-appointed independent Planning Inspector. This consultation is a bit different to the previous stages.

The Government asks you to consider whether the Pre-Submission (Regulation 19) Local Plan is legally compliant and consistent with national policy, known as the 'Tests of Soundness'.

The Pre-Submission document includes:

- Strategic Priorities
- Sites where new homes, jobs and other facilities could be located
- Policies that the Council would use to decide planning applications.

We are consulting on the Pre-Submission Local Plan and its accompanying Integrated Impact Assessment from 10am on Tuesday 4 February 2025 until 4pm on Tuesday 18 March 2025.

For more information go to:
www.chelmsford.gov.uk/lp-review

Chelmsford Local Plan

Chelmsford City Council

Review of the Local Plan – FAQs
4 February 2025

What is the pre-submission (Regulation 19) consultation?

We are reviewing our adopted Local Plan.

We adopted our current plan in May 2020. This is available at www.chelmsford.gov.uk/adopted-plan and it guides growth and development across Chelmsford City Council's area to 2036. We need to review the plan at least every five years, to see if we need to update it. We need to consider new national policy and changing local circumstances, and make sure we meet the needs of our current and future residents. The review will mean that the Local Plan will now run until 2041.

Why do we have to review the adopted Local Plan?

We adopted our current Local Plan in May 2020 and good progress is being made with implementing it. Government requirements mean we must provide more homes, so we need to review the plan at least every five years to ensure that it remains up to date and continues to meet our needs for development growth to 2041.

The Government is clear that housing growth is fundamental to revitalising the economy and the thrust of national planning guidance (NPPF) is to 'boost significantly the supply of housing'. The need for housing is not just a national issue, but a local one too.

Without an up-to-date Local Plan, the Council could have very little influence over the location of new development and the provision of infrastructure. Sites could be promoted for development in locations that the Council and its communities want to protect, and which are not considered sustainable. Not having an up-to-date Local Plan would create uncertainty and make it harder to secure appropriate sites for new infrastructure such as schools and health facilities.

What Stage is the Local Plan at?

- **Issues and Options – Previous stage**
  This was the first stage of consultation which took place in August to October 2022.

- **Preferred Options – Previous stage**
  This was the second stage of consultation which took place in May to June 2024.

  Many people and organisations commented on the Issues and Options and Preferred Options consultations. All representations have been carefully considered alongside updated evidence, national planning policy, new local priorities, and monitoring data. We have published all the comments on our consultation portal.

- **Pre-Submission (Regulation 19) – Current stage**
  This is the third round of public consultation on the final draft Local Plan before we submit it for examination by a government-appointed independent Planning Inspector. The consultation focuses on legal compliance and consistency with national planning policy and runs for a period of six weeks from 10am on Tuesday 4 February 2024 to 4pm on Tuesday 18 March 2025.

- **Submission – Future stage**
  This is the formal Submission of the Local Plan. All Plan documents, evidence, and all comments received at Pre-Submission stage are submitted to the Planning Inspector for an Independent Examination.

What does the Pre-Submission (Regulation 19) Local Plan cover?

The Pre-Submission (Regulation 19) Local Plan includes:

- Updated and new Strategic Priorities and Policies
- Updated plan Vision
- Numbers for future development requirements, including homes and jobs
- A strategy for locating additional future growth to 2041 including new and updated site allocations
- Updated Draft Policies Map.

How has the plan changed since the Preferred Options Local Plan consultation?

Numerous changes have been made from the Preferred Options Local Plan to the Pre-Submission (Regulation 19) Local Plan. Some of the plan changes relate to suggestions arising in the preferred options consultation responses. Others address recent evidence base work, respond to new information or have been made for clarification and consistency. Most changes made are considered relatively minor in nature and as such the Pre-Submission (Regulation 19) Local Plan essentially remains substantially the same in principle to the Preferred Options Consultation Document.

Policies are shown in the order they appear logically in the plan and will be renumbered in the final version**.**

How much development is proposed and where in the Pre-Submission (Regulation 19) Local Plan?

The Pre-Submission (Regulation 19) Local Plan follows the approach in the Preferred Options Local Plan by continuing to focus new housing and employment growth to the most sustainable locations in three Growth Areas - 1 Central and Urban Chelmsford, 2 North Chelmsford and 3 South and East Chelmsford.

The existing site allocations in the adopted plan (May 2020) which are not yet built are carried forward in the Pre-Submission (Regulation 19) Local Plan. Many of these sites are now coming forward, with masterplans being approved and planning applications decided or in progress. Some sites have also started building.

We have calculated that our annual housing requirement is 1,210 homes per year from 2022, when we started reviewing the Local Plan, until 2041. This equates to 22,990 homes.

To meet additional housing growth needs to 2041 we have allocated new sites for around 4,233 new homes. Provision is also made for a further 2,181 new homes beyond 2041. The Pre-Submission (Regulation 19) Local Plan also plans to meet future employment needs by providing additional employment allocations for around 107,500sqm. These figures have been informed by updated evidence base and data, including the Strategic Housing Needs Assessment Addendum (2024) and Employment Land Review – Focused Update (2024).

We are not considering growth in the Green Belt or Green Wedge.

How have we used the previous Preferred Options consultation comments?

The Council undertook a second round of public consultation on a Preferred Options document in May to June 2024. All the responses have been carefully considered and used to progress the Pre-Submission (Regulation 19) Local Plan alongside an updated plan evidence base, national planning policy, new local priorities, and monitoring data.

The ‘You Said We Did’ feedback report provides a summary of how the Pre-Submission (Regulation 19) Local Plan has been informed by the Preferred Options consultation responses. It also summarises the representation received, the main issues raised and provides a summary of how the Preferred Options Local Plan has been informed by the representations and the evidence base. The ‘You Said We Did’ is available at www.chelmsford.gov.uk/lp-review.

Is Hammonds Farm still a site allocation in the Pre-Submission (Regulation 19) Local Plan?

Yes, Hammonds Farm (SGS16a) and Junction 18 A12 Employment Area (SGS16b) remain site allocations in the plan. However, the site allocation policies have been refined and strengthened, where appropriate, to help address community and stakeholder concerns raised and any suggestions made for their improvement. This includes changes

to the Draft Policy Map to allocate land within the site to ensure important landscape and heritage features are protected.

The Council acknowledges that significant levels of opposition were received to these sites during the Preferred Options Local Plan consultation. However, it is important to note that the Council makes decisions on evidence and sound planning judgments, rather than solely basing them on the number of objections made.

What is the Integrated Impact Assessment?

The Integrated Impact Assessment (or IIA for short) assesses the Pre-Submission (Regulation 19) Local Plan against a range of social, environmental and economic indicators and helps to identify all the likely significant effects. The IIA advises on ways in which any adverse effects could be avoided, reduced or mitigated or how any positive effects could be maximised. This helps to ensure that the policies, plans and allocations in the Local Plan are promoting sustainable development. We are consulting on this at the same time as the Pre-Submission (Regulation 19) Local Plan.

When is the pre-submission (Regulation 19) consultation?

The Pre-Submission (Regulation 19) Local Plan and accompanying Integrated Impact Assessment (IIA for short) are published for six weeks consultation from 10am on 4th February 2025 before the plan is submitted for examination by a government-appointed independent Planning Inspector.

Who can take part in the pre-submission (Regulation 19) consultation?

Anyone with an interest in Chelmsford can take part in the consultation.

How can I take part in the pre-submission (Regulation 19) consultation?

The consultation is a different to the previous stages. The Government asks you to consider whether the Pre-Submission Local Plan is legally compliant and consistent with national policy, known as the 'Tests of Soundness'. There are specific consultation questions based on a suggested model representation form by the Planning Inspector.

Where can I view the pre-submission (Regulation 19) consultation documents?

You can read the consultation documents in the following ways:

- On the Council's Consultation Portal at www.chelmsford.gov.uk/planningpolicyconsult. This system also allows you to submit comments to the consultations
- On the Council's website alongside the Local Plan evidence base documents at www.chelmsford.gov.uk/lp-review
- At the Chelmsford City Council Customer Service Centre, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford CM1 1JE (10am to 4pm Monday to Friday).

At some staffed drop-in public exhibitions – see later FAQs for details.

How can I comment on the pre-submission (Regulation 19) consultation documents?

You can comment on the consultation documents in the following ways:

Online Consultation Portal:
Go to: www.chelmsford.gov.uk/planningpolicyconsult where you can:

- Read the consultation documents
- Make your comments via the specially designed representation form
- Sign up for alerts to feedback reports and future consultations

This is our preferred means of receiving comments as it ensures that your comments are recorded accurately and are processed quickly. If you have not used this system before or have any difficulties logging in, please see our guidance notes at:www.chelmsford.gov.uk/lp-portal-guide or call us on (01245) 606330.

In writing:
If you prefer to send comments in writing, please fill in the relevant specially designed representation forms for each consultation event.

Local Plan representation forms cover the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document and the Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment consultations.

The Local Plan representation forms can be downloaded at www.chelmsford.gov.uk/lp-review. Paper copies of these representation forms for are also available from Chelmsford City Council's Customer Service Centre (details above) or on request by telephoning (01245) 606330 or emailing planning.policy@chelmsford.gov.uk

Forms can be returned:

- By e-mail to planning.policy@chelmsford.gov.uk
- By post to Planning Policy, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE
- By hand to Chelmsford City Council Customer Service Centre (details above).

The use of the Local Plan representation forms is strongly recommended as this will ensure that comments are related to the matters relevant to the subsequent Independent Examination by a Planning Inspector. If you do not have access to a computer, you can request paper copies. A charge will be made to cover printing and postage costs. If you have difficulties making representations by e-mail or post due to a disability, please call us (01245) 606330.

Any late comments received after 4pm on 18 March 2025 cannot be accepted and individual acknowledgement of receipt will not be possible.

What is 'legal compliance'?

Local Plans are legally compliant if they are:

- prepared in accordance with the Council's latest Local Development Scheme
- accompanied by a Sustainability Appraisal and Habitats Regulations Assessment

- subject to consultation carried out in accordance with the Council's Statement of Community Involvement
- compliant with all relevant laws including the Planning and Compulsory Purchase Act (PCPA) and the Town and Country Planning (Local Planning) (England) Regulations 2012; and
- prepared in line with the Duty to Co-operate.

Please read the Statement of Representation Procedure and Statement on Availability for full details about how to make your comments available at www.chelmsford.gov.uk/lp-review.

What is 'soundness'?

Local Plans are considered sound if they are:

- **Positively prepared** – provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common grounds; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

Please read the Statement of Representation Procedure and Statement on Availability for full details about how to make your comments available at www.chelmsford.gov.uk/lp-review.

What is the 'duty to cooperate'?

The Council has a legal duty to cooperate with other national and local bodies, such as neighbouring planning authorities, Essex County Council and Historic England. The purpose of the duty is to discuss and address strategic cross-boundary issues such as housing, employment and infrastructure needs.

These discussions have helped to formulate the Pre-Submission Local Plan. The Pre-Submission Duty to Co-operate Position Statement provides evidence of this ongoing engagement and where agreement has been reached. This Statement is also supported by Statements of Common Ground which are being agreed with organisations. These will be available on the Council's website as they are agreed at www.chelmsford.gov.uk/lp-review.

Will previous consultation responses be carried forward?

No, all comments made on previous consultations in 2022 and 2024 have already been considered. A new representation must be submitted if individuals and organisations still have relevant comments to make. The Local Plan examination will also be based around

matters raised by representations made on the Pre-Submission (Regulation 19) Local Plan rather than previous versions.

Where and when are the Local Plan exhibitions?

The Civic Centre drop-in public exhibitions will be staffed and provide an opportunity to meet a planning officer face-to-face. The other exhibitions in High Chelmer and South Woodham Ferrers will not be staffed – see details below. Please check our website www.chelmsford.gov.uk/lp-review for any updates before making your journey.

Location	Date	Time
Council Chamber, Civic Centre, Duke Street, Chelmsford, CM1 1JE	Thursday 27 February Friday 28 February Saturday 1 March	6pm - 8pm 2pm - 4pm 10am - 12noon
High Chelmer Shopping Centre, Exchange Way, Chelmsford, CM1 1XB	Monday 24 February to Sunday 2 March	Unstaffed exhibition panels displayed all-day during shopping centre opening hours
South Woodham Town Council, Champions Manor Hall, Hullbridge Road, South Woodham Ferrers, CM3 5LJ	Thursday 13 February to Tuesday 25 February	Unstaffed exhibition panels displayed 9am - 4pm (except weekends)

You can also view the exhibition online at www.chelmsford.gov.uk/lp-review.

What is the evidence base?

National policy requires the Council to ensure that its Local Plan is based on appropriate up-to-date evidence about economic, social and environmental characteristics and prospects of Chelmsford. The evidence base comprises studies and working with key stakeholders and groups across the City area. More recently completed evidence base used to inform the Pre-Submission Local Plan include:

- Updated Viability Assessment
- Updated Infrastructure Delivery Plan
- Updated Heritage Impact Assessment
- New Strategic Housing and Employment Land Availability Assessment (SHELAA)
- Strategic Housing Needs Assessment Addendum Report
- Employment Land Availability Assessment Focused Review
- New Open Space Assessment
- New Archaeology Assessment
- New Air Quality Assessment
- Level 2 Strategic Flood Risk Assessment – updated and new site summary tables and maps
- Sequential and Exception Testing Focused Update, and
- Local Neighbourhood Centre Technical Note.

These evidence base documents are available online via www.chelmsford.gov.uk/lp-review. There are also evidence base documents which were used to support the adopted Local Plan which are still relevant. These evidence base documents are available to view at: https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-local-plan/adopted-local-plan/evidence-base/

Information on how the Pre-Submission (Regulation 19) Local Plan has been informed by the updated plan evidence is set out in a Preferred Options 'You Said We Did' Feedback Report also available at www.chelmsford.gov.uk/lp-review.

What weight does the Pre-Submission (Regulation 19) Local Plan have in decision making?

The Pre-Submission (Regulation 19) Local Plan indicates the Council's intent to address future growth requirements in Chelmsford in the period to 2041 and beyond in a planned and sustainable way. However, at this stage it will be of limited weight in decision making on planning applications,

It will not have full Development Plan status until it has been adopted by the Council. At this point the new Plan would also replace the current adopted plan.

What happens after the Pre-submission (Regulation 19) Local Plan consultation?

All duly-made responses will be submitted to the Planning Inspector, alongside the Pre-Submission (Regulation 19) Local Plan and evidence base. The Council will produce a summary of the main issues raised in the consultation responses for the Planning Inspector and publish this online.

All duly-made comments will be published on the Council's Consultation Portal in accordance with the General Data Protection Regulations. To be duly made, you need to provide your name and address with your comment. Anonymous comments will not be accepted. Your name, your comments and any information provided, including supporting documents, will be available for public inspection and published online. We will not publish any personal details.

Section 149 of the Equality Act 2010 requires that the Council should avoid any form of discrimination and also foster good relations between different ethnic groups. We will not display, share or consider any comments that are inappropriate, including those that are racist, inflammatory or derogatory. Any such comments will be considered as inadmissible and will not be accepted.

The Council will acknowledge receipt of all duly-made comments although it will not enter into individual correspondence.

How can I be kept up to date on progress?

We have a specially designed consultation portal for Local Plan and other planning policy consultations. If you register, you can:

- read and save consultation documents
- make your comments online
- receive alerts on future consultations

You can find out more about how to use the consultation portal online at www.chelmsford.gov.uk/lp-portal-guide

You can also sign up to the Chelmsford City Life mailing list, to receive news updates.

What are the Planning Advice Note and Supplementary Planning Document consultations?

We are also consulting on a Co-Living Housing Planning Advice Note and Draft Planning Obligations Supplementary Planning Document (SPD) from 10am on 4 February to 4pm on 18 March 2025.

The Planning Advice Note seeks to provide practical guidance to potential promoters or developers of co-living housing in Chelmsford, to ensure they meet the Council's expectation in this regard.

The Consultation Draft Planning Obligations Supplementary Planning Document (SPD) is also being consulted on. This sets out how the Council will seek planning obligations when considering planning applications. The adopted SPD was published in January 2021 and has been updated to reflect proposed changes in the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document, as well as changes in national planning policy. It refers to the latest published Infrastructure Delivery Plan and integrates and updates some published Planning Advice Notes.

You can view and comment on the Planning Advice Note and SPD on the consultation portal at www.chelmsford.gov.uk/planningpolicyconsult:

4. Co-Living Housing Planning Advice Note Consultation - click on this event to view and comment

5. Consultation Draft Planning Obligations Supplementary Planning Document - click on this event to view and comment

Planning Policy Team, 4 February 2025
Spatial Planning Services
January 2025
01245 606330
planning.policy@chelmsford.gov.uk



Pre-Submission Local Plan consultation

Comms & Marketing Campaign

February/March 2025

Chelmsford City Council

Pre-submission Local Plan consultation

Print Ads - Magazines

Publication	Details	Issue date	Circulation
City Times www.thecitytimes.co.uk	A4 full colour 32pp	14 Feb – 15 March	**Monthly, 10K.** • **Nearest Thursday to 15th each month.** • Available to pick up in many outlets across Chelmsford, Maldon, South Woodham Ferrers, Ongar and Ingatestone.
South Woodham Focus https://focuspp.com/the-focus-south-woodham-edition/	A4 full colour 24pp	2 March 2025	**Monthly, 6.5K** • Available to pick up at 16 different collection points across South Woodham Ferrers

Chelmsford City Council

Pre-submission Local Plan consultation

Print Ads - Magazines





https://www.chelmsfordthecitytimes.co.uk/

The City Times (free magazine)

Advert on page 13 for issue number 136
(14 Feb – 15 March 2025)





https://focus-magazine.co.uk/

South Woodham Focus (free magazine)

Advert on page 23 for issue March 2025
(March 2025)

Chelmsford City Council

Pre-Submission Local Plan consultation

City Life website

	Title	Date	URL	Visits	Page Views	Unique visitors
1	**Have your say on Chelmsford's development to 2041**	4/2/2025	https://citylife.chelmsford.gov.uk/posts/have-your-say-on-chelmsford-s-development-to-2041	827	899	706
2	**Preparing for Chelmsford's third and final Local Plan consultation**	17/2/2025	https://citylife.chelmsford.gov.uk/posts/preparing-for-chelmsford-s-third-and-final-local-plan-consultation	967	1,036	875
3	**Local Plan exhibitions begin**	14/2/2025				



1



2



3

Pre-Submission Local Plan consultation
Meta paid ad #1 10 – 17 Feb

Account stats	March 2025
Followers	12.2K

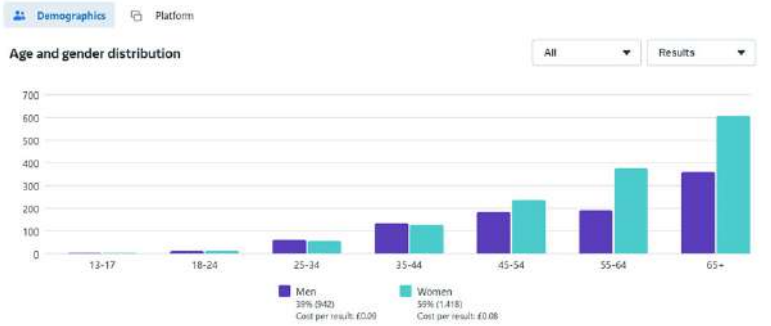
@chelmscouncil

Engagement stats	
Post comments	11
Post reactions	35

Stats 10 – 17 Feb 2025	
Total reach	**23,675**
Impressions	53,715
Link clicks	2,412
CTR	7.93%







- **Reach**: The number of users who've seen your content.
- **Impressions**: The total number of times your ad has been seen.
- **Clicks**: The number of times users have clicked on your ad.
- **Engagement/interactions**: The collective number of likes, comments, and shares your ad has received.
- **Click-Through Rate**: The percentage of users who clicked on your ad after seeing it.

Chelmsford City Council

Pre-Submission Local Plan consultation
Meta paid ad #2 10 – 18 March

Account stats	March 2025
Followers	12.2K

@chelmscouncil

Account stats	[date]
Post comments	49
Post reactions	29

Stats 10 – 18 March 2025	
Total reach	**22,888**
Impressions	54,286
Link clicks	2,537
CTR	4.67%







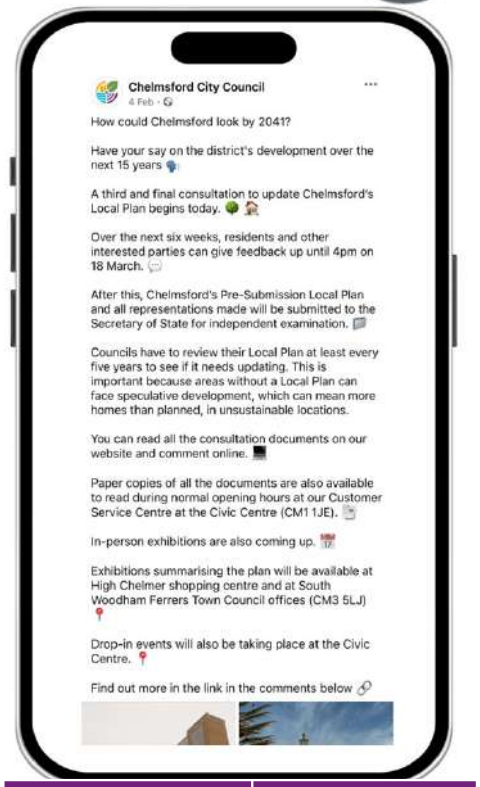
- **Reach**: The number of users who've seen your content.
- **Impressions**: The total number of times your ad has been seen.
- **Clicks**: The number of times users have clicked on your ad.
- **Engagement/interactions**: The collective number of likes, comments, and shares your ad has received.
- **Click-Through Rate**: The percentage of users who clicked on your ad after seeing it.

Chelmsford City Council

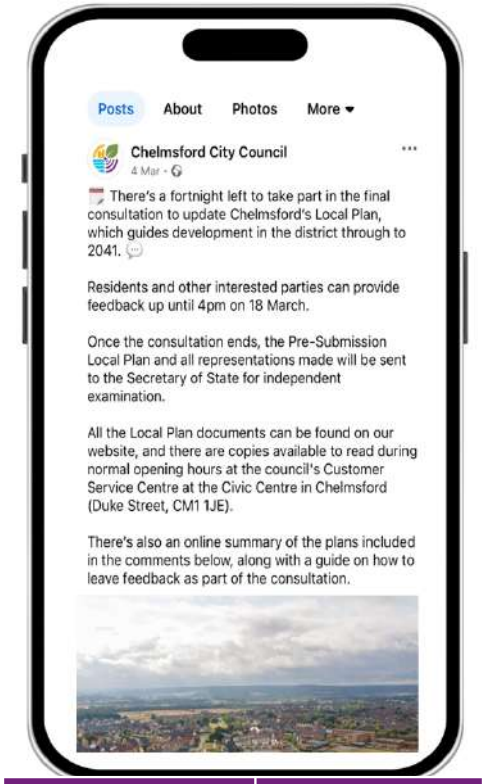
Pre-Submission Local Plan consultation
Facebook organic posts @chelmscouncil



Key post stats	15 Jan 2025
Total reach	**2,518**
• Reactions	16
• Comments	15
• Shares	7
• Clicks	280



Key post stats	4 Feb 2025
Total reach	**5,656**
• Reactions	32
• Comments	18
• Shares	16
• Clicks	1,341



Key post stats	4 March 2025
Total reach	**3,019**
• Reactions	10
• Comments	57
• Shares	6
• Clicks	366

- **Reach**: The numbe**r of users who've seen your content.**
- **Impressions**: The total number of times your ad has been seen.
- **Clicks**: Includes clicks on photos and links.
- **Engagement/interactions**: The collective number of likes, comments, and shares your ad has received.

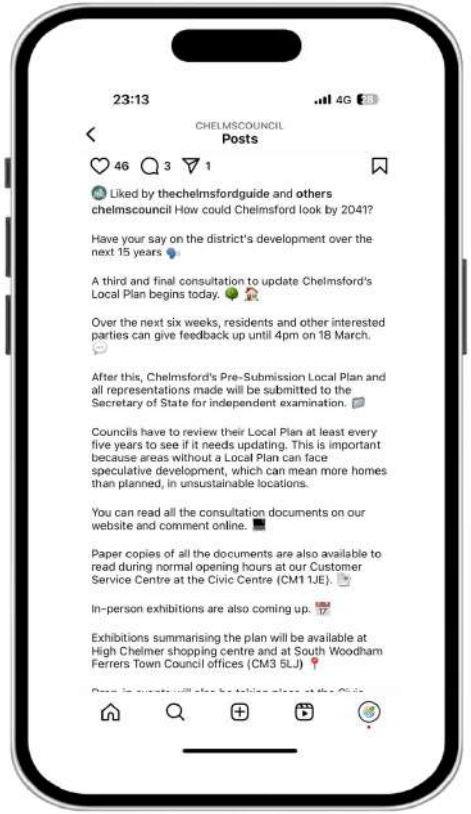
Account stats	March 2025
Followers	**12.2K**

Chelmsford City Council

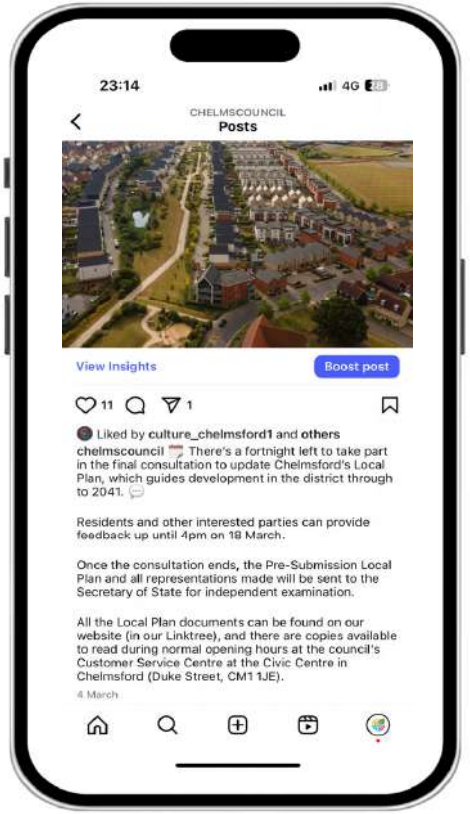
Pre-Submission Local Plan consultation
Instagram organic posts
@chelmscouncil

- **Reach**: The numbe**r of users who've seen your content.**
- **Likes**: The total number of likes your post has received.
- **Comments**: The number of comments people have made on your post.
- **Saves**: the number of accounts that have saved your post.

Account stats	March 2025
Followers	3.3K



Key post stats	4 Feb 2025
Total reach	**1,049**
• Likes	46
• Comments	3
• Saves	4



Key post stats	4 Mar 2025
Total reach	**728**
• Likes	11
• Comments	0
• Saves	2

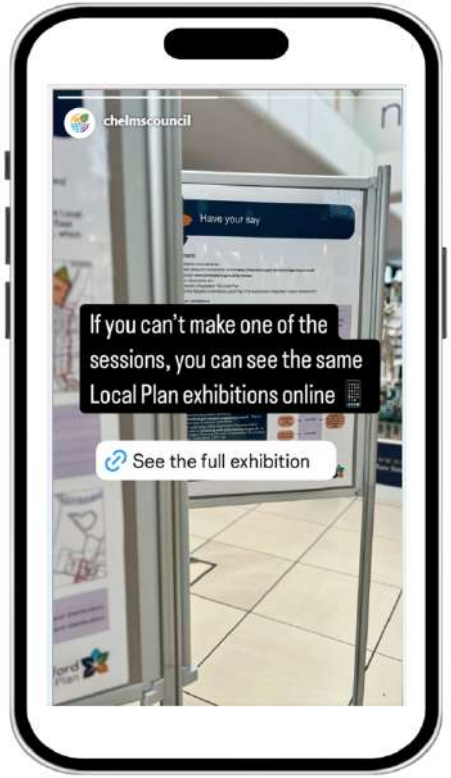
Chelmsford City Council

Pre-Submission Local Plan consultation
Facebook/Instagram stories
27 Feb 2025









Chelmsford City Council

Pre-Submission Local Plan consultation
Facebook/Instagram stories



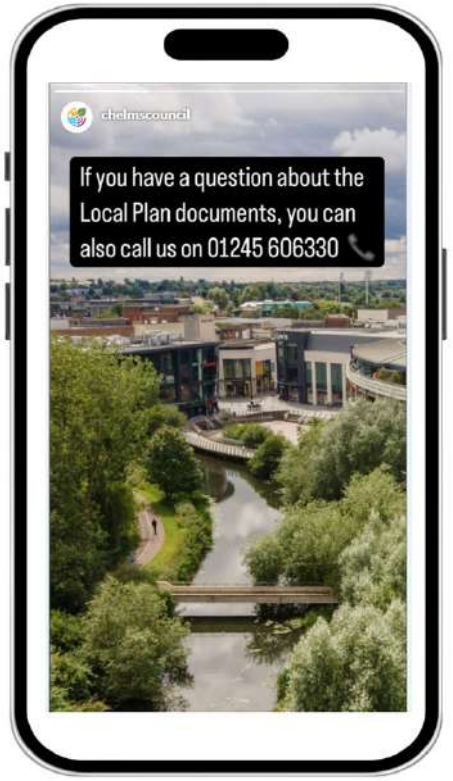
28 Feb 2025



28 Feb 2025



17 Mar 2025

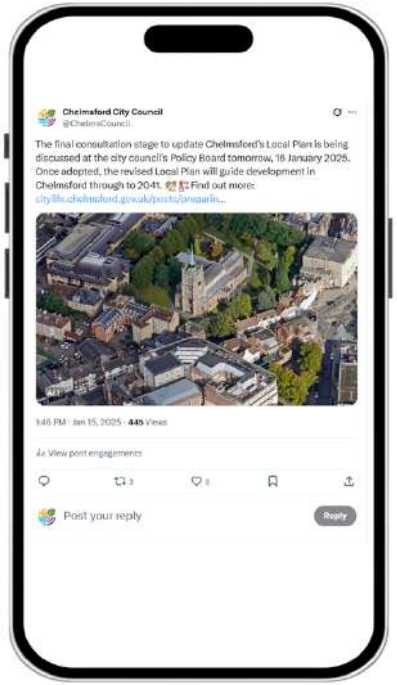


17 Mar 2025

Chelmsford City Council

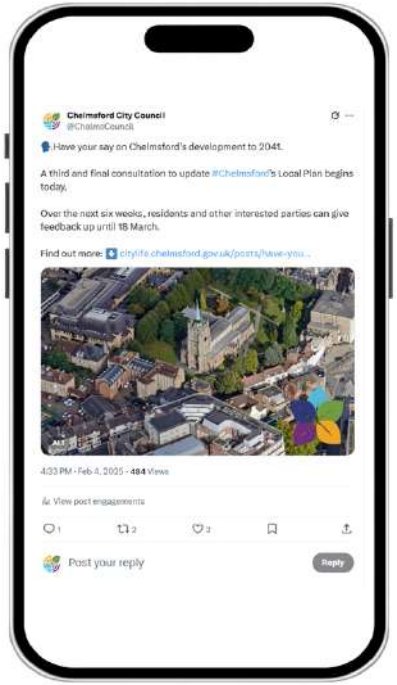
Pre-Submission Local Plan consultation
X (Twitter) organic posts
@chelmscouncil

Account stats	
Followers	17.6K



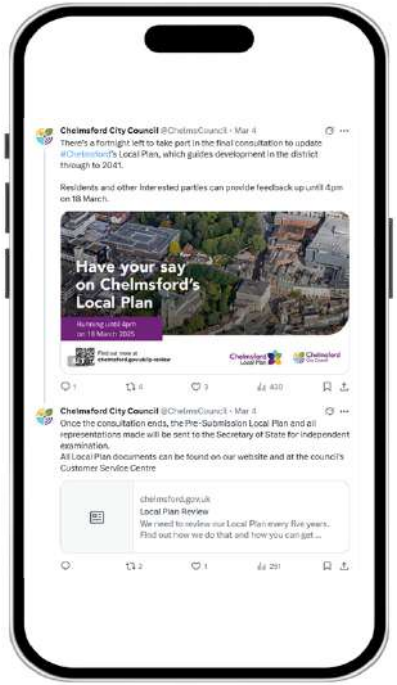
15 Jan 2025

- 446 impressions
- 33 engagements
- 17 link clicks



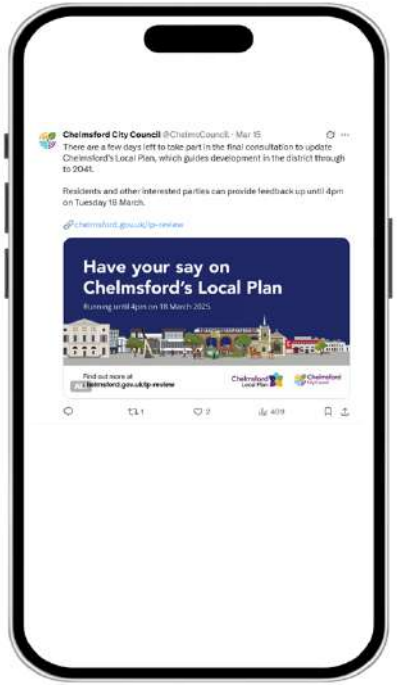
4 Feb 2025

- 485 impressions
- 38 engagements
- 21 link clicks



4 March 2025

- 432 impressions
- 15 engagements
- 0 link clicks



15 March 2025

- 410 impressions
- 10 engagements
- 4 link clicks



17 March 2025

- 457 impressions
- 15 engagements
- 6 link clicks

Chelmsford City Council

Pre-Submission Local Plan consultation
Nextdoor organic posts
Chelmsford City Council

Account Stats
- **Members:** 35,784 and **Claimed households:** 26,913 (households with at least one confirmed member)

Campaign Stats
- **Impression Count:** Number of views for our post
- **Thank Count:** Number of reactions (like, heart, etc.) on our post
- **Reply Count:** Number of comments on the post



15 Jan 2025

- 3,504 impressions
- 7 engagements
- (1 thank you, 6 replies)



4 Feb 2025

- 1,944 impressions
- 1 engagement
- (1 thank you)



27 Feb 2025

- 1,226 impressions
- 2 engagements
- (2 replies)



11 March 2025

- 1,715 impressions
- 2 engagements
- (2 replies)



18 March 2025

- 1,414 impressions
- 1 engagements
- (1 reply)

Chelmsford City Council

Pre-Submission Local Plan consultation

Email campaigns



e-shot

	Email	Date	Sent to	Displays/opens	Relevant link clicks
1	**City Life** Item: Local Plan consultation to start next month (lead story)	17 Jan 2025	10,629	47.67%	278 for item https://news.comms.chelmsford.gov.uk/p7e5/Design/x4-8m85
2	**City Life** Item: Have your say on Chelmsford's development to 2041 (lead story)	7 Feb 2025	10,635	55.72%	191 for item https://news.comms.chelmsford.gov.uk/p7e5/Design/3o-9h45
3	**City Life** Item: Local Plan exhibitions begin	14 Feb 2025	10,639	47.16%	53 for item https://news.comms.chelmsford.gov.uk/p7e5/Design/iz-i472
4	**Local Plan special** Have your say on Chelmsford's Local Plan	18 Feb 2025	10,641	55.24%	236 for bulletin (4.37% of opens) https://news.comms.chelmsford.gov.uk/p7e5/Design/ic-7xh1

Average rates for Local Authorities on e-shot

- Displays/opens = 40.6%

Chelmsford City Council

Pre-Submission Local Plan consultation

Email campaigns

e-shot

1



2



3



4



Chelmsford City Council

Pre-submission Local Plan consultation

Email campaigns



e-shot

	Email	Date	Sent to	Displays/opens	Relevant link clicks
5	**City Life** Item: Chelmsford's Local Plan exhibitions continue	21 Feb 2025	10,641	55.31%	35 for item https://news.comms.chelmsford.gov.uk/p7e5/Design/04-bc25
6	**Invest Chelmsford Business** Local Plan bulletin	4 March 2025	5,153	45.94%	69 https://news.comms.chelmsford.gov.uk/p7e5/Design/q8-ce7c5
7	**City Life** Item: Chelmsford's Local Plan consultation	8 March 2025	10,656	50.66%	72 for item https://news.comms.chelmsford.gov.uk/p7e5/Design/q7-pm6
8	**City Life** Item: Reminder: Local Plan consultation closes soon	14 March 2025	10,679	54.53%	63 for item https://news.comms.chelmsford.gov.uk/p7e5/Design/a7-4p82

Average rates for Local Authorities on e-shot

- Displays/opens = 40.6%

Chelmsford City Council

Pre-Submission Local Plan consultation

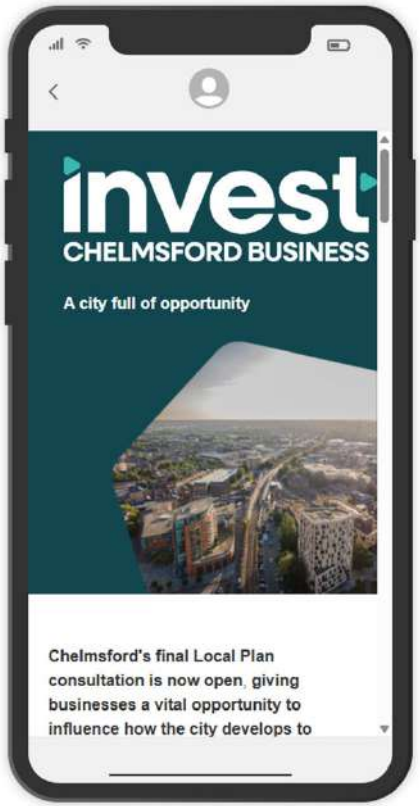
Email campaigns

e-shot

5



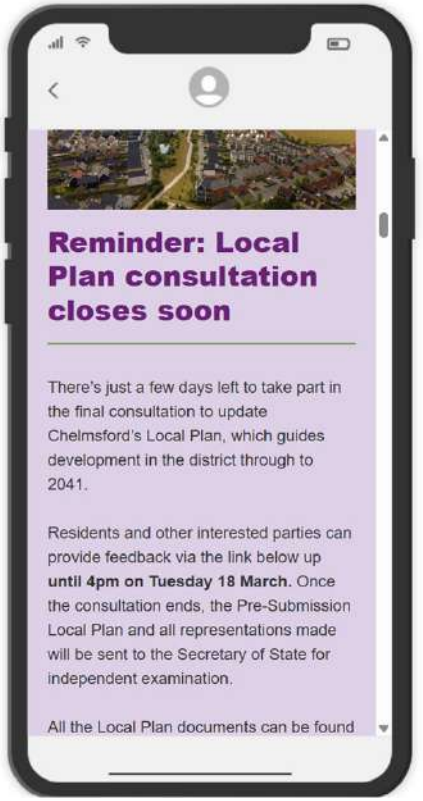
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7



8



Chelmsford City Council

Pre-submission Local Plan consultation

Corporate website

Web page date	Description
6 January 2025	Chelmsford Policy Board – alert to meeting date for approval to consult
4 February 2025	Pre-Submission Consultation Launch
18 March 2025	Consultation closing information
2 May 2025	Confirmation of receipt of comments, which are published on the Consultation Portal



We are reviewing our adopted Local Plan. We are currently consulting on the Chelmsford Local Plan: Pre-Submission (Regulation 19) Document.

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Chelmsford Local Plan

Pre-submission consultation stage

How to have your say

You can view the Local Plan review consultation documents on our specially designed Planning Policy consultation portal.

Also in this section

- Adopted Local Plan
- Request housing and planning policy advice
- Brownfield register
- Self-build, custom build and community-led housing

City Council

Pre-submission Local Plan consultation

Press coverage

Publication/title	URL	Date
Essex Live: Where 26,000 homes will be built across Chelmsford including major city centre redevelopment and new Essex village	https://www.essexlive.news/news/essex-news/26000-homes-built-across-chelmsford-9848710	11/01/2025
Yellow Advertiser: Consultation on Chelmsford's 26,000-home development plan set to be launched	https://www.yellowad.co.uk/consultation-on-chelmsfords-26000-home-development-plan-set-to-be-launched/	13/01/2025
Essex Live: Residents to have their say on plan for 23,000 new homes in Chelmsford	https://www.essexlive.news/news/essex-news/residents-say-plan-23000-new-9872022	20/01/2025
Essex Chronicle: Last chance to have your say on plan for area up to 2041	No link available (print only)	20/02/2025
Essex Chronicle: Consultation on Homes Schemes given go-ahead	No link available (print only)	23/01/2025

Chelmsford City Council

Pre-submission Local Plan consultation

Clear Channel Digital Screens

Clear Channel digital screens in Chelmsford (FOC)

These cover a range of bus stops in the city centre



Ads ran from 27/02/2025 until 18/03/2025

- The ads were shown on rotation for the duration of the hours scheduled
- There were 25,613 plays of this ad across 7 screens, including: Parkway (B&M), Parkway Flyover, Waterhouse Lane, Springfield Road, Rainsford Lane, Moulsham Street (Junction with London Road)

Buses cater to people of all ages, professions, and backgrounds, making bus shelters an ideal medium to reach a broad captive target audience. The ads are also visible to passing audience/traffic.

Research suggests that people are more likely to remember ads they've seen on a digital screen compared to static posters or banners.

Chelmsford City Council

Pre-submission Local Plan consultation

Digital screens in CCC venues

30 x screens on the Brightsign network (FOC)

- 25 screens across 4 leisure centres: over 1.7m attendances p.a.
- 2 screens in Theatre: over 156.5k attendances p.a.
- 1 screen at Museum: 106.4K footfall p.a.
- 2 screens (Sandon & Chelmer Valley) at Park & Ride

Local Plan consultation ads were shown on the following CCC venue screens between 17 Feb – 18 March:

- Riverside Leisure Centre
- South Woodham Ferrers Leisure Centre
- Chelmsford Sport and Athletics Centre
- Dovedale Sports Centre
- Chelmsford Theatre
- Museum of Chelmsford
- Park & Ride screens



Appendix 2: Essex Highways Local Plan Pre-Submission – Response to Representations (September 2025)

Document Control Sheet

Essex Highways

Transport Planning
Victoria House
Chelmsford
CM1 1JR

W www.essex.gov.uk/highways

Project Number	B3553RA4
Status	Final
Revision	2
Control Date	23rd September 2025

Record of Issue

Issue	Status	Author	Date	Check	Date	Review	Date
1	Draft	JW/KS	11/07/25	MS	18/07/25	MS	18/07/25

Approved for Issue By	Date
KS (APM)	23/09/25

Distribution

Organisation	Contact	Number of Copies
Essex County Council	HN	Electronic
Chelmsford City Council	LP	Electronic

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The following table summarises comments raised in representations to the Pre-Submission (Regulation 19) Local Plan (or Local Plan for short) relating to the transport modelling evidence base. It also provides a focused response to these main issues. ECC/CCC contributions are also included to present a combined response.

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
Comment by: Wates Developments and Hammonds Estates – Comment ID: PS25-242			
1.	Query regarding need to determine preferred Rapid Transit corridor through Hammonds Farm development.	Bullet 10 under 'Movement and Access' of the site policy (Strategic Growth Site 16a) of the Pre-Submission Local Plan) and Paragraph 7.367 of the Local Plan refers to the need to 'Provide Bus Based Rapid Transit Infrastructure'. Concern is raised at the principle within paragraph 7.367 that the masterplan should provide a "choice of unimpeded route corridors within the developed area, able to carry rapid transit services", with the need to determine "a preferred route corridor through the development". It is not appropriate to pre-judge the nature of the rapid transit measures that will be most suitable for the East Chelmsford Garden Community development at this stage, we consider it essential that Paragraph 7.367 be updated. The current wording overstates the need for an unimpeded corridor, which at this stage is not justified by evidence.	*It is accepted that the nature of rapid transit measures within the site will be confirmed at a later stage of the planning process. Therefore, wording in bullet 10 of the site policy and paragraph 7.367 of the Local Plan has been altered to reflect this.* *Nevertheless, it is seen as critical that dedicated and attractive sustainable transport options are provided within, and between the development and to key destinations (such as the city centre) to ensure the 60% modal shift is achieved.*
Comment by: Walshingham Planning, on behalf of Little Baddow, Sandon, Boreham & Danbury Parish Councils – Comment ID: PSQ25-6174			
2.	Assessing the potential level of sustainable accessibility is not appropriate.	The evidence base (T003) explains that Hammonds Farm has potentially a "good level" of sustainable accessibility, subject to the provision of local amenities and sustainable travel infrastructure by developers. We fundamentally disagree with this change in analysis. When reviewing the potential development options, the sites should be reviewed on a level playing field and considered in relation to their current context to provide a fair assessment of the alternative strategies. Otherwise,	*Whilst the potential for improved sustainable accessibility was considered for the Hammonds Farm site as part of the Sustainable Accessibility Mapping and Appraisal 2022 (T003), metrics presented in the report covered existing levels of accessibility and were therefore consistent and comparable with the other spatial approaches considered.*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
		any site - situated in the most remote location - could in theory become 'sustainable' and 'accessible', if the facilities and transport infrastructure are provided, and there is no meaningful comparison.	*It was nevertheless felt reasonable to acknowledge the potential for improved sustainable accessibility at the Hammonds Farm site. Given its location, the site provides opportunities for improved walking, cycling and public transport connections to existing transport hubs in the vicinity such as Sandon Park and Ride and Beaulieu Park Rail Station. The site is also located within cycling distance of the city centre and benefits from an existing bus priority corridor along the A1114 Essex Yeomanry Way.* *Larger development sites offer a greater opportunity for investment in the delivery of focused and well-connected public transport and walking/cycling infrastructure and services. Their size can also help with the successful implementation of Travel Plans to encourage sustainable travel uptake.*
3.	Sites in the existing urban area of Chelmsford are more sustainably accessible.	Currently – there are other growth options available, that are more sustainable and accessible with regards to the existing urban area, and where there are already established facilities and other infrastructure and utilities upon which to build and develop.	*The approach the City Council has undertaken to identify its spatial strategy and development locations is set out in Topic Paper 2 - Spatial Strategy and Strategic Sites. This has been undertaken by considering several factors:* - *How much new development is needed? (Development Requirement)* - *Where are the potential development sites? (SHELAA)* - *What is important as part of Chelmsford's growth? (Vision and Strategic Objectives)*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
			- *Where is most accessible and have the most existing services and facilities? (Settlement Hierarchy)* - *What impact does new development have and how can it be supported and/or mitigated? (Integrated Impact Assessment and Evidence Base)* *Whilst development on brownfield sites within the Chelmsford urban area is an important consideration, placing heavy focus on development in this area can pose challenges when considering the availability of space for the necessary expansion of infrastructure and public transport services (such as the provision of cycle routes or bus priority measures), and limits on the size and type of dwellings that can be built.* *It is recognised that a sizeable allocation of development in the Plan Review is situated to the east of Chelmsford at Hammonds Farm. This location provides opportunities for walking, cycling and public transport links to both Sandon Park and Ride and Beaulieu Park Rail Station. The site is located within cycling distance of the city centre and benefits from an existing bus priority corridor along the A1114 Essex Yeomanry Way.* *Larger development sites offer a greater opportunity for investment in the delivery of focused and well-connected public transport and walking/cycling infrastructure and services. Their size can also help with the successful*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
			implementation of Travel Plans to encourage sustainable travel uptake.
4.	Modelling based on a 60% active and sustainable mode share assumption is overly ambitious and unrealistic.	Strategic Growth Site Policy 16a suggests that measures to enable travel by active and sustainable modes should ensure a 60% share for active and sustainable transport modes. This assumption is built into the Council's Transport Impact Appraisal (TIA) (T006), which consequently sets out very low assumptions for trip generation rates in relation to Hammonds Farm and the new employment allocation to the south (Strategic Growth Site 16b). We question, however, how justifiable it is to base the entire assessment on an assumption that 60% of trips will take the form of active and sustainable travel, which would appear to be overly ambitious and thus not realistic.	*The trip rates used in the Transport Impact Appraisal (TIA) of the Local Plan Review Pre-Submission (T006) are consistent with those accepted for use in the business case assessments of major schemes in Chelmsford – including the Army & Navy Roundabout and Chelmsford North-East Bypass. Whilst the trip rates are low compared with those that might be calculated using a 'business as usual' approach (i.e. using existing travel behaviour as a basis for determining future travel behaviour), they nevertheless represent a reasonable uptake in sustainable travel mode alternatives (an approach that is compatible with National Planning Policy Framework (NPPF) guidance). However, they are not as low as trip rates based directly on a 60% active and sustainable mode share.* *Additional information on the use of trip rates in the Transport Impact Appraisal (TIA) is provided in response to Item ID 16.*
5.	Hammonds Farm development will perform no differently to existing neighbourhoods with low levels of active and sustainable travel use.	It is unclear why the new community at Hammonds Farm – which will be located some distance from the main urban area - will perform differently to the existing neighbourhoods, and will achieve such extremely high levels of active travel and sustainable travel usage.	*It should be noted that Strategic Growth Site (SGS) Policy 6 – North East Chelmsford (Chelmsford Garden Community), as well as SGS Policy 16a East Chelmsford Garden Community (Hammonds Farm) requires the developer to implement measures to enable travel by active and sustainable modes and that offer travel choice for people by non-car modes including a network of*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
			mobility hubs to enable a 60% share for active and sustainable transport modes. *SGS Policy 16a requires the Garden Community to be comprehensively planned with a range of on-site land uses and facilities designed through its masterplanning to maximise opportunities for active and sustainable travel, following Town and Country Planning Association (TCPA) Garden City Principles, in particular the principle requiring `Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport'. Requirements are included the policy site masterplanning principles.* *Any Transport Assessment (TA) will be required to have regard to the ECC 'Transport Assessment Guide for Large-Scale Developments and Garden Communities: A Guide for Developers'. The TA must demonstrate how the development will identify and provide active and sustainable transport measures that achieve mode share targets and will be required to ensure that the site is accessible by a choice of modes other than the private car, including cycling, walking and public transport. This will be implemented at the planning application stage.* *The Travel Plan Guide for Large-Scale Developments and Garden Communities provides more detailed guidance regarding the implementation/monitoring stages than previous*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:

			guidance. Every large scale or garden community residential site has a mandatory target of 60% of trips to and from and within the site to be made by non-car means within five years of build out, unless otherwise agreed. This target is in line with the recommended TCPA modal share target. Interim targets, starting at not less than 50%, may be considered as part of the Travel Plan. This will be implemented at the planning application stage.
			
			The monitoring of Travel Plans will be more rigorous than previously, including the establishment of a quarterly Transport Review Group. There will be;
			- *regular bi-monthly meetings with the on-site Residential Travel Plan Co-ordinator (RTPC) to track progress including,*
			  ○ *monitor and review mode share targets, including trigger points for phases of development, as identified in the Transport Assessment and Travel Plan informed by annual traffic surveys;*
			  ○ *review of the S106 to ensure annual targets have been met or to amend requirements*
			  ○ *co-ordinate other activities including promotional event days to encourage the take up of active and sustainable travel modes; undertake residents surveys; monitor uptake of Residential Travel Information Packs and season tickets.*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
			NPPF guidance for Plan appraisal encourages use of a 'vision and validate' approach to calculating development trips and the subsequent appraisal of mitigation. However, for planning applications, developers will be expected to make provision for a 'business as usual' approach towards assessing development impact and identifying necessary mitigation, and then adopt a 'monitor and manage' approach for the subsequent implementation.
6.	Lack of detail on proposed sustainable mitigation.	There are currently no details regarding the nature of the cycle and footpath links proposed, how connection will be made across the A12, how many bus services will be provided, their frequency and routes.	*The detail of these routes will be expanded on at the masterplan and planning application stages.* *Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm), Site masterplanning principles - Movement and Access sets out the following requirements in the Pre-Submission Local Plan) which will need to be demonstrated to the satisfaction of the City Council in consultation with the highway authority to ensure connectivity across and under the A12, including:* - *Bullet 2 - new multi-modal vehicular bridge over the River Chelmer with measures to deter use as a through-route* - *Bullet 3 - well-connected internal road layouts allowing good accessibility for bus services and bus priority measures* - *Bullet 4 - an effective movement strategy for all users within the site and beyond* - *Bullet 5 - pedestrian, cycle and where appropriate bridleway connections within*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
			the site including links to the River Chelmer Navigation and to the wider area including the Chelmer East Green Wedge, existing education locations, Chelmsford City Centre, Danbury, Little Baddow, Great Baddow and Sandon, Beaulieu Park Rail Station, and existing and proposed employment locations including SGS16b - *Bullet 7 - safe multi-user access routes under and over the A12 to connect to existing routes* - *Bullet 8 - a new active and sustainable route and bridge over the A12 to connect close to Sandon Park and Ride* - *Bullet 9 – Measures to enable travel by active and sustainable modes that offer travel choice for people by non-car modes including a network of mobility hubs, to enable a 60% share for active and sustainable transport modes.* *Alongside this, Strategic Policy S9 – Infrastructure Requirements, paragraph 6.91 states that more detailed analysis of traffic impacts and mitigation options testing will be required through the preparation of Transport Assessments/Statements as part of future planning applications. This will include the requirements listed above in addition to details regarding the level of passenger transport provision including their frequency and routes.* *In addition, Strategic Policy S16 – Connectivity and Travel requires new development to be designed to*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
			provide for attractive, safe, convenient, inclusive, high quality and well-designed walking and cycling networks with supporting facilities. Paragraph 6.71 requires these to be consistent with LTN 1/20 – Cycling infrastructure design (2020) namely coherent; direct; safe, comfortable and attractive. *Specific measures will be agreed through the masterplanning and planning application stage, both of which are required to be approved by the City Council, with sufficient commitment towards mitigation being sought from developers as part of the Plan process.*
7.	Accessibility between Hammonds Farm and Sandon Park and Ride.	The proposed routes and linkages between the Hammonds Farm site and Sandon Park and Ride will clearly not be direct or seamless. Only the very south-western corner of the site would be within a 20-minute walk of the Sandon Park and Ride facility.	*Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm) requires the developer through future masterplanning and the relevant planning applications to provide wider connectivity to the Sandon Park and Ride via safe multi-user access routes under and over the A12 to connect to existing routes (bullet 7 of the Pre-Submission Local Plan) and a new active and sustainable route and bridge over the A12 to connect close to Sandon Park and Ride (bullet 8 of the Pre-Submission Local Plan).* *Some residents will live within walking distance of Sandon Park and Ride, however for others there will be alternative provision such as cycling and bus routes.* *Further connectivity for residents in the new community will also be required via a new multi-*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
			modal vehicular bridge over the River Chelmer with measures to deter use as a through-route (bullet 2 of the Pre-Submission Local Plan); well-connected internal road layouts allowing good accessibility for bus services and bus priority measures (bullet 3 of the Pre-Submission Local Plan); an effective movement strategy for all users within the site and beyond (bullet 4 of the Pre-Submission Local Plan); and pedestrian, cycle and where appropriate bridleway connections within the site including links to the River Chelmer Navigation and to the wider area including the Chelmer East Green Wedge, existing education locations, Chelmsford City Centre, Danbury, Little Baddow, Great Baddow and Sandon, Beaulieu Park Rail Station, and existing and proposed employment locations including SGS16b (bullet 5 of the Pre-Submission Local Plan).
8.	Access concerns to Beaulieu Rail Station.	With concern raised in the TIA (T006) around the potential capacity of the road / junction access to Beaulieu Rail Station, there is no evidence that the new community will be served by exemplary public / active travel connections, which would be essential in order to achieve anything like a 60% modal share.	*Potential access concerns are raised in the TIA (T006) to ensure that sufficient financial commitments are sought from developers to contribute towards improvements to public transport access to/from Chelmsford rail station as an alternative.* *Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm) requires the developer through future masterplanning and the relevant planning applications to provide an effective movement strategy for all users within the site and beyond (bullet 4 of the Pre-Submission Local Plan), wider connectivity to the Sandon Park*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
			and Ride via safe multi-user access routes under and over the A12 to connect to existing routes (bullet 7 of the Pre-Submission Local Plan), a new active and sustainable route and bridge over the A12 to connect close to Sandon Park and Ride (bullet 8 of the Pre-Submission Local Plan), measures to enable travel by active and sustainable modes that offer travel choice for people by non-car modes including a network of mobility hubs, to enable a 60% share for active and sustainable transport modes (bullet 9 of the Pre-Submission Local Plan), and Bus Based Rapid Transit infrastructure (bullet 10 of the Pre-Submission Local Plan). *These will provide onward connections into the city centre and Chelmsford rail station (as indicated in bullet 5 of the Pre-Submission Local Plan).* *Paragraph 7.367 within the Reasoned Justification also states that the development will be required to provide an appropriate Bus Based Rapid Transit, which is a direct, frequent bus service connecting with the City Centre and Chelmsford and Beaulieu Park Rail Stations.*
9.	Bus Rapid Transit access from Hammonds Farm to city centre.	The TIA (T006) reveals that: "All the principal roads and many local roads through Chelmsford are at, or near to, capacity during peak periods". It is therefore highly unlikely that a continuous Bus Rapid Transit service to the city centre and neighbouring destinations would be achievable, or that it would attract a material modal share.	*The limited capacity of the city centre road network is raised in the TIA (T006) to ensure that sufficient financial commitments are sought from developers to contribute towards improvements to public transport access to/from Chelmsford city centre.*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
			Paragraph 7.367 within the Reasoned Justification for Strategic Site Policy 16a states that the development will be required to provide an appropriate Bus Based Rapid Transit, which is a direct, frequent bus service connecting with the City Centre and Chelmsford and Beaulieu Park Rail Stations. *A bus priority corridor already exists from the Sandon Park and Ride via the Army and Navy to the city centre via the rail and bus stations.* *The Army and Navy Sustainable Transport Package is increasing capacity at Sandon Park and Ride by 350 spaces, providing a new northbound bus lane on Princes Road, and improved bus priority in both directions on Parkway. ECC will work with the developers through the masterplan and planning application processes to determine any further enhancements, such as an extension of the bus lane along Essex Yeomanry Way, that could be provided to serve residents and key locations.*
10.	Robustness of Chelmsford VISUM Forecast Model build.	The transport model relied upon by the Council is a traffic impact appraisal using the latest version of the Chelmsford VISUM Forecast Model and has been revalidated to 2019 traffic flows, but no recent traffic surveys have been undertaken in support of the model inputs. Significantly, the model is not validated to turning movements at junctions.	*At the time of the Local Plan Review modelling, a decision was made to work with the 2019 VISUM base model in order to maintain consistency with other studies undertaken in Chelmsford – including the Army & Navy Roundabout and Chelmsford North-East Bypass business case appraisals. A separate assessment was undertaken to demonstrate the continued robustness of the 2019 base model and growth forecasts, accounting for the traffic impact of COVID in Chelmsford over the*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
			period 2020/21. This assessment is documented in the Appendix A2 of the TIA (T006). *For a strategic model covering the extent of the Chelmsford administrative area (and beyond) Department for Transport (DfT) Transport Appraisal Guidance (TAG) does not include a requirement for validation to turning movements at junctions. Base model approach flows at junctions along key strategic corridors through and around Chelmsford are shown to be comparable with observed data, and effort has been made to caveat findings and analysis, as appropriate, where modelled turning flow proportions are understood to differ noticeably from observed.*
11.	Timeframe of modelling	The Council's modelling only extends to 2041, as such there is a significant unknown regarding the long-term impact of the strategic allocation options, especially as further growth is proposed in the Hammonds Farm area post-2041.	*The scope of the modelling extends to the end of the Local Plan Review period in 2041 – as is required for an Evidence Base aligned to NPPF guidance. For strategic modelling, there are challenges associated with predicting longer-term traffic growth, whilst uncertainty remains around National Highways' Road Investment Strategy and the sources of funding for larger infrastructure projects. This limits the ability to model robust assumptions around the long-term delivery of potential infrastructure that could impact traffic patterns on the strategic road network across Essex and beyond.*
12.	Access proposals / consideration of bus priority infrastructure	The access proposals for the sites, as presented in the TIA (T006), give no consideration to bus priority, bus lanes, or a bus gate, which will be necessary in order to deliver Bus	*The TIA (T006) is purposely strategic in nature and is intended to assess the impact of proposed development on the wider network only. Specific*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
		Rapid Transit infrastructure. Indeed, there are significant limitations along the A414, which limit options for road widening to accommodate bus priority measures. This further highlights the lack of deliverable sustainable access strategies to serve the proposed allocation(s).	*access arrangements to sites, and mitigation proposals, will be assessed in more detail as part of the masterplan and planning application stages.* *Given that Hammonds Farm is a Large Strategic local plan site, ECC / CCC will be prioritising the assessment and feasibility of options along the A414 corridor for the masterplan and planning application stages, to ensure that the right measures are identified and agreed with developers.*
13.	Congestion at A12 J18	The modelling shows significant queue lengths on the approach to the eastern roundabout of the A12 Junction 18, and this requires further analysis. Indeed, during the PM peak hour, the A12 Junction 18 southbound off-slip is shown to operate over capacity with a queue of approximately 180m. It cannot be assumed that the congestion and queuing will be alleviated by the implementation of active travel and sustainable travel routes, for the reasons detailed above.	*Hammonds Farm developers will be required to monitor the impact of their development on on/off-slips at A12 Junction 18. ECC and CCC are also committed to working with National Highways to promote the need for long-term capacity improvements along the A12 corridor.* *Specific access arrangements to the proposed Hammonds Farm site, and mitigation proposals for Junction 18 itself, will be assessed in more detail as part of the masterplan and planning application stages.*
14.	Congestion at A12 J17	The A12 Junction 17 will operate over capacity on almost all arms of the junction during the AM and PM peak periods up to 2041, with and without the addition of the Local Plan Pre-Submission draft allocated site trips. The TIA acknowledges that there are currently no feasible plans in place to update the layout of this junction. Clearly, any proposals for site allocation on the eastern	*While it is recognised that there are challenges associated with locating development to the east of Chelmsford, alternative locations face arguably greater challenges:* - *The north of Chelmsford is already well-built out with significant development allocated in the adopted Local Plan. The local transport network, despite*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
		edge of Chelmsford will have a serious impact on the operation of this junction, which is already under stress.	*infrastructure improvements, is expected to have limited capacity to accommodate further development. Expansion further north away from the main urban area of Chelmsford will also reduce the potential for travel by sustainable modes.* - *The south of Chelmsford is impacted by Green Belt and is therefore not suitable for development.* - *The west of Chelmsford already has development allocated in the adopted Local Plan – with limitations on the space available to provide improved public transport infrastructure into the city centre.* *While there are no current approved plans for J17, ECC and CCC are committed to working with National Highways to promote the need for long-term capacity improvements along the A12 corridor.*
15.	Modelling of additional access at J19 for Hammonds Farm	The current modelling results presented in the evidence base cannot be relied upon, as they do not demonstrate at this stage that an additional access from Junction 19 to serve the Hammonds Farm scheme can be accommodated.	*The impact of an additional access to the Hammonds Farm site from A12 Junction 19 has been assessed separately by consultants SLR on behalf of Hammonds Farm developers.* *This work is currently being reviewed by CCC, ECC and National Highways. Specific mitigation proposals will be assessed in more detail as part of the masterplan and planning application stages.*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
16.	Use of low trip rates	The modelling is based on very low trip rates, which represents a 30% reduction in typical residential vehicle trip rates. When using the TRICS database to determine trip rates for large residential developments, sites of a similar nature and scale are selected to ensure comparative trip rates are calculated. This means that for large scale developments, the TRICS data already takes account of the internalisation of trips and access to sustainable modes of travel. As such, further reducing the rates by 30% is 'double-counting' and a major error in the analysis, which significantly under-estimates the likely highways impact of the new developments.	*It is acknowledged that the trip rates used within the TIA (T006) modelling are relatively 'low' compared with a 'business as usual' approach to determining trip rates and represent a higher level of trip-internalisation and sustainable and active travel mode-share.* *The trip rates used in the main assessment of the Local Plan Review were selected and are considered appropriate for two main reasons:* 1. *To remain consistent with previous Chelmsford forecast modelling, including the Army & Navy and Chelmsford Northeast Bypass assessments. The Army & Navy model has been accepted by DfT, as being appropriate for the assessment of the Army & Navy Sustainable Transport Package.* 2. *NPPF guidance specifically outlines the need for an aspirational approach to development planning, and therefore use of lower trip rates as part of the Local Plan Review TIA was considered appropriate in line with this guidance, to represent the levels of trip generation that could be achieved with the successful implementation and uptake of sustainable and active mode infrastructure.* *As part of the additional sensitivity test, a reduction in trip rates for both residential and employment sites was applied – at a rate of 13% reduction of*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
			residential trips and 6% reduction in employment trips. This was an additional assessment undertaken to show the potential impact of a future scenario with an even higher mode shift. It is recognised, and stated within the TIA (T006), that the reduction in trips under this scenario are very aspirational, and to achieve this would require the provision and use of additional passenger transport services to be significantly higher than typically expected. However, the purpose of undertaking this sensitivity assessment was to provide an indication of what the network impact could look like, if a more aspirational rate of mode shift was achieved - given the policy requirement for the Hammonds Farm site to achieve a 60% mode share target.
17.	Impact of rat-running through local villages.	As identified in the TIA, there will be serious adverse consequences for the rural routes on the local road network, which will have direct adverse impacts on small, historic villages, such as Little Baddow, Danbury, Boreham and Sandon.	*The sustainable and active mode measures proposed for implementation by developers of Hammonds Farm should reduce the volume of car trips to/from the site, which (modelling suggests), should reduce the volume of traffic rat-running through local villages. The developer will be expected to monitor the levels of traffic through villages, such as Boreham and Sandon, before, during and after the site build-out. This will be used as criteria to determine development impact, which will trigger requirements for the developer to provide additional infrastructure. More detail can be found in "The Essex County Council Developers' Guide to Infrastructure Contributions Revised 2024".*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
			Detail on this 'monitor and manage' approach should be covered in the development Transport Assessment at the masterplan and planning application stages. *NPPF guidance for Plan appraisal encourages use of a 'vision and validate' approach to calculating development trips and the subsequent appraisal of mitigation. However, for planning applications, developers will be expected to make provision for a 'business as usual' approach towards assessing development impact and identifying necessary mitigation, and then adopt a 'monitor and manage' approach for the subsequent implementation.* *Rat-running is strongly linked to the levels of network congestion on the A12, and ECC / CCC continue to have regular dialogue with National Highways to emphasise the need for improvements on the A12. If these improvements came forward, this would further alleviate rat-running on the local road network through Boreham.*
18.	Realism of 60% mode share targets.	A 60% mode share for active and sustainable travel will be challenging to achieve in practice on a strategic employment site (south of A414), with a high volume of HGV movements and over 700 employees. The current outline application (for Land at Junction 18 – planning application reference number 24/01768/OUT) makes no provision for direct bus services to the site, and no provisions are made for the delivery of dedicated bus lanes along the A414. This will severely limit opportunities for employees to utilise sustainable transport.	*ECC / CCC will continue to work closely with the developers for both sites, to ensure an integrated and coordinated approach, and joint commitment to delivery of necessary sustainable and active mode infrastructure.* *Strategic Growth Site Policy 16b does not require the development to provide a 60% mode share for active and sustainable travel. The policy does require the developer to:*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
			- *Develop a movement Strategy outlining the necessary transport interventions* - *Provide well-connected and integrated internal road layouts which allow good accessibility for bus services and bus priority measures* - *Provide safe and convenient pedestrian and cycle connections within the site and to the wider area including to local bus stops, Sandon Park and Ride, Woodhill Road, routes associated with the East of Chelmsford allocations including East Chelmsford Garden Community (Hammonds Farm) and Danbury and the east of the site* - *Maximise the use of public transport within the site and to key destinations* - *Provide safe multi-user crossings of the A414.* *ECC is presently drafting its response to the outline planning application. Initial comments are generally supportive in that the application is seeking to demonstrate it meets the policy requirements as set out above.* *With regards to passenger transport the application seeks to provide active travel links to the Sandon Park and Ride given its proximity. There could be provision for a more bespoke and flexible Demand Responsive Transport service for the site, which can be progressed through the Travel Plan.*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
			Consequently, ECC does not consider there is a need for bus lanes in association with this site. *While the current outline application for the employment site doesn't make specific provision for a direct bus service to the site, or for delivery of a dedicated bus lane, given its close proximity to the residential site to the north, there is an opportunity to ensure the delivery of high quality infrastructure through a coordinated approach with the Hammonds Farm residential site to the north.* *Given that both sites are in the Local Plan, this provides an opportunity for a joint approach to obtaining funding and delivering the required infrastructure that will service the needs of both sites.*
19.	Severance of employment site on land east of A12.	It is evident that the land to the east of the A12 is severed from the main urban area of Chelmsford, and despite the aspiration to achieve linkages, this will be challenging to deliver in practical terms, to ensure safe, convenient and welcoming active travel connections.	*There are recognised opportunities with development to the eastern edges of Chelmsford, including the following:* 1. *Multiple sites included within the Local Plan – this means that there is an opportunity for an integrated approach to the delivery of active and sustainable transport measures for both sites. ECC and CCC will work to ensure that the planning applications are looking at this opportunity cohesively* 2. *Close proximity to existing Park & Ride site and opportunities for expansion*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
			3. *Existing priority bus lanes along Essex Yeomanry Way and within the city centre* 4. *Opportunities to enhance the planned sustainable links being provided by the Army and Navy Sustainable Transport Package improvements and outcomes from the Chelmsford Local Cycling and Walking Infrastructure Plans (LCWIPs).* *In addition, ECC / CCC will be working closely with the developers to ensure the successful delivery of proposed additional key infrastructure, such as the provision of a bus, walking and cycle-only bridge link over the A12 connecting the developments to the western side of the A12, and provision of an Eastern Orbital Route serving as a bus corridor enabling access for proposed new bus services to Beaulieu Park Rail Station.* *As stated in Strategic Policy S9 – Infrastructure Requirements, paragraph 6.91 – more detailed analysis of traffic impacts and mitigation options testing will be required through the preparation of Transport Assessments/Statements as part of the future masterplan process and planning applications. This will include safe, convenient and welcoming active travel connections, with cycling routes being required to be consistent with LTN 1/20 standards.*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
Comment by: Gladman Developments Ltd – Comment ID: PSQ25-6320			
20.	Para 4.3.12 to 4.3.18: Questions around the robustness of modelling & highways impact of the development of up to 4,500 dwellings, 3,000 in the plan period.	The robustness of the modelling assumptions used to justify approximately 75% of new housing allocations in this location is questionable given the long-term nature of this site and the reliance on infrastructure improvements that are yet to exist.	*The modelling approach and associated assumptions used in the TIA (T006), are understood to be commensurate with the strategic nature of the Local Plan appraisal.* *More detailed, local modelling will, however, be expected from developers as part of the planning application process, with a requirement to demonstrate that effective infrastructure is identified and delivered to mitigate the impact of the development.*
21.	Lack of detailed modelling at the Boreham Interchange	Gladman have significant concerns that a decision has been made to not model the capacity performance of the Boreham Interchange for the Local Plan sensitivity test scenarios without capacity improvements associated with the widening of the A12. The National Highways AECOM (A12 widening DCO) study did not account for the impact of Local Plan Review development trips from the proposed Hammonds Farm site accessing the Boreham Interchange directly via a new access arm on Generals Farm Roundabout.	*Conclusions from the Local Plan Pre-Submission modelling reported in the TIA (T006) determined that the A12 widening Development Consent Order (DCO) capacity improvements at the Boreham Interchange were required as a minimum. It was therefore considered unnecessary to model the impact of Local Plan Review development without these improvements as the existing layout would have been modelled as significantly over-capacity.* *A desktop assessment was undertaken to look at the potential impact of the additional Local Plan Review development on the A12 J19 Boreham Interchange, using the local junction modelling work carried out for the A12 widening DCO and accommodating the change in flow at the junction associated with Local Plan development from the Pre-Submission strategic modelling.*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
			The impact of Local Plan development at Junction 19 has been assessed in more detail by consultants SLR on behalf of Hammonds Farm developers. This work is currently being reviewed by CCC, ECC and National Highways. Specific mitigation proposals will be assessed in more detail as part of the masterplan and planning application stages.
Comment by: Maldon District Council (MDC). Comment ID: PSQ25-4934			
22.	Impact of additional traffic on the A12, from sites 16a and 16b, and knock-on impact of re-routing traffic through Maldon	The Transport Impact Appraisal of Preferred Spatial Approach, March 2024 (T006) notes that: Of the Local Plan development allocated in the preferred spatial approach on greenfield sites outside of the city centre, only Hammonds Farm and the employment site adjacent to the A12 J18 are shown in the modelling to generate vehicle flows of sufficient volume to impact traffic conditions significantly on the surrounding road network'. This site allocation could therefore impact on businesses within Maldon and the local road network around Maldon, as currently any issues on the A12 result in traffic travelling through Maldon instead. The higher volume of traffic could negatively impact on the local road network. The roads that could be impacted are the A414 leading from this site towards Maldon, the Duke of Wellington mini roundabout at Hatfield Peverel including the accesses on and off the A12 at this location and an increase in traffic on the A130, which provides access to Chelmsford for the south and east of the Maldon district. These roads already hold high levels of traffic and consideration should be given to the impacts	*The strategic modelling presented in the TIA (T006) includes a high-level assessment of cross-border impact, considering the increase in traffic flows on main routes between Chelmsford and Maldon District, and the impact of proposed development traffic on routes into/out of Maldon District – including those using local and rural rat-run routes. The strategic modelling has highlighted the broad potential impact of Plan development, which will be used as evidence to ensure that developers of sites along the A12 corridor assess and mitigate the specific impact of development flows on local routes.* *Strategic Growth Site (SGS) Policy 6 – North East Chelmsford (Chelmsford Garden Community), as well as SGS Policy 16a East Chelmsford Garden Community (Hammonds Farm) requires the developer to implement measures to enable travel by active and sustainable modes and that offer travel choice for people by non-car modes including a network of mobility hubs to enable a*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
		on these roads if the A12 widening scheme is not granted funding. There is also concern regarding the impact on roads within the Maldon district, such as Broad Street Green and Goldhanger Road, which links the north of Maldon with the A414 and the strategic road network. These roads are already significantly impacted by the increasing number of vehicles that use them. It is therefore requested consideration is given to the impacts on the local road infrastructure.	*60% share for active and sustainable transport modes.* *SGS Policy 16a requires the Garden Community to be comprehensively planned with a range of on-site land uses and facilities designed through its masterplanning to maximise opportunities for active and sustainable travel, following Town and Country Planning Association (TCPA) Garden City Principles, in particular the principle requiring ` Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport'. Requirements are included the policy site masterplanning principles.* *Any Transport Assessment (TA) will be required to have regard to the ECC 'Transport Assessment Guide for Large-Scale Developments and Garden Communities: A Guide for Developers'. The TA must demonstrate how the development will identify and provide active and sustainable transport measures that achieve mode share targets and will be required to ensure that the site is accessible by a choice of modes other than the private car, including cycling, walking and public transport. This will be implemented at the planning application stage.* *The Travel Plan Guide for Large-Scale Developments and Garden Communities provides more detailed guidance regarding the implementation/monitoring stages than previous*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
			guidance. Every large scale or garden community residential site has a mandatory target of 60% of trips to and from and within the site to be made by non-car means within five years of build out, unless otherwise agreed. This target is in line with the recommended TCPA modal share target. Interim targets, starting at not less than 50%, may be considered as part of the Travel Plan. This will be implemented at the planning application stage. *The monitoring of Travel Plans will be more rigorous than previously, including the establishment of a quarterly Transport Review Group.* *There will be;* ○ *regular bi-monthly meetings with the onsite Residential Travel Plan Co-ordinator (RTPC) to track progress including,* ○ *monitor and review mode share targets, including trigger points for phases of development, as identified in the Transport Assessment and Travel Plan informed by annual traffic surveys;* ○ *review of the S106 to ensure annual targets have been met or to amend requirements* ○ *co-ordinate other activities including promotional event days to encourage the take up of active and sustainable travel modes; undertake residents surveys; monitor uptake of Residential Travel Information Packs and season tickets.*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
Comment by: Boreham Parish Council. Commend ID: PSQ25-3149			
23.	60% modal shift policy and parking provision	The Local Plan's assumption of a 60% modal shift and reduced car parking provisions for a 3,000-house development (Strategic Growth Site 16a) is concerning, as similar strategies have led to significant issues elsewhere. For instance, in the UK, the 'Space to Park' report highlights that inadequate residential parking can result in parking overspill into neighbouring areas, increased illegal or unsafe parking blocking pavements and emergency access routes, and knock-on effects for existing communities. These examples underscore the potential pitfalls of underestimating parking needs in new developments, leading to unintended consequences for both residents and neighbouring communities.	*There is no reduction in car parking provision proposed for Strategic Growth Site 16a.* *The Travel Plan Guide for Large-Scale Developments and Garden Communities provides more detailed guidance regarding the implementation/monitoring stages than previous guidance. Every large scale or garden community residential site has a mandatory target of 60% of trips to and from and within the site to be made by non-car means within five years of build out, unless otherwise agreed. This target is in line with the recommended TCPA modal share target. Interim targets, starting at not less than 50%, may be considered as part of the Travel Plan. This will be implemented at the planning application stage.* *The monitoring of Travel Plans will be more rigorous than previously, including the establishment of a quarterly Transport Review Group.*
Comment by: Boreham Conservation Society. Comment ID – PSQ25-5255			
24.	Growth Site Policy 9a – Waltham Road Employment Area.	Concerns around the inclusion of this site as an employment area. Response states it should be removed from the Pre-Submission document for a number of reasons outlined in the detailed comment. Reasons related to highway / traffic impact include the following: • It would generate additional traffic movements on top of those already proposed due to the A12 widening scheme and the closure of junction 20a. The A12 widening scheme is already planned to increase traffic through	*It is acknowledged, and evidenced by the TIA (T006), that development close to the A12 corridor could cause an increase in re-routing of traffic through villages, including Boreham, Sandon and Little Baddow.* *Reducing the impact of future development on the local road network is a priority for ECC / CCC, with close working with developers to ensure*

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		Boreham by up to 50%, to propose even further traffic movements and particularly Heavy Goods Vehicles would be a mistake. • Because of recent local development and the A12 widening scheme National Highways predict the junction of Waltham Road and Main Road to be beyond capacity within the life of this proposed Local Plan. • A travel plan will not promote alternatives to the use of private cars and is not enforceable. Currently the majority of employees and users of the existing industrial estate arrive by motor vehicle, which are parked, either on site or on Main Road opposite the old Cock public house due to congestion when arriving or leaving the site. • Existing cycle and pedestrian walkways are poorly maintained this will not change. • Any additional highway works would adversely infringe on the rural setting of this country road	*commitment to the delivery of adequate sustainable and active travel infrastructure to limit the impact of these developments on the local road network in Boreham.* *Strategic Policy S9 – Infrastructure Requirements, paragraph 6.91 states that more detailed analysis of traffic impacts and mitigation options testing will be required through the preparation of Transport Assessments/Statements as part of future planning applications.* *In addition, Strategic Policy S16 – Connectivity and Travel requires new development to be designed to provide for attractive, safe, convenient, inclusive, high quality and well-designed walking and cycling networks with supporting facilities. Paragraph 6.71 requires these to be consistent with LTN 1/20 – Cycling infrastructure design (2020) namely coherent; direct; safe, comfortable and attractive.* *Specific measures will be agreed through the masterplanning and planning application stage, both of which are required to be approved by the City Council, with sufficient commitment towards mitigation being sought from developers as part of the Plan process.* *Findings from the TIA demonstrate the need for investment in the strategic road network around Chelmsford to protect local areas and enable the delivery of longer-term growth. ECC / CCC will*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
			continue conversations with National Highways to ensure this is a priority. *The form and extent of highway works, active travel measures and/or Travel Plan initiatives will be considered in the context of their setting and their need.*
Comment by: Mrs Helen Taylor. Comment ID: PSQ25-6479			
25.	Safety concerns along B1008 in Ford End show that further development is not appropriate	Comment in response to development along a stretch of the B1008 in Ford End which suffers from accidents. Over last 18 years we have seen crashes, speeds and dangerous overtaking as cars enter the village and with established poor visibility by highways. There are no options which are viable which would make it a safe enough road to house people on. Modifications of the road are not permitted due to its PR1 status.	*ECC has to be data driven and provide resource and solutions in areas where there are high numbers of collisions together with people being seriously and fatally injured. Whilst it is acknowledged that there have been several collisions at this location over the past decade (as provided by the residents), unfortunately this is also the case for thousands of other locations across Essex when looking at 10-15 years of collision data.* *Due to limited budgets and current safety engineering funding arrangements, the Highways Authority has to look at the most recent 3 years collision data and undertake analysis and draw conclusions from that data set.* *By way of explanation for the disparity between the information from residents and the information Essex County Council has on record, the police and ambulance service may have attended certain collisions, but these may have not been physically recorded as injury collisions and are deemed as 'damage only' collisions.*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
			Any access arrangements would need to be compliant with design regulations and go through appropriate Road Safety Audits. This would be undertaken via the planning application stage.
Comment by: Vistry. Comment ID: PSQ25-6378			
26.	Infrastructure requirements for Strategic Growth Site 10	Infrastructure Requirements (Strategic Policy S9) – Strategic Policy S9 - the 9th bullet point relates to capacity improvements on the A132 'including' junction improvements. The evidence submitted with the recent planning application, however, demonstrates that it is the junction improvements that provide the necessary increase in capacity on the highway network, and that there is no need for any other form of capacity improvement on the A132 corridor. The reference should therefore be amended to refer to 'Improvements to A132 junctions between South Woodham Ferrers and Rettendon Turnpike to increase capacity'.	*The response by Vistry relates to the wording in the Regulation 18 Preferred Option Local Plan for Policy SGS 10 - North of South Woodham Ferrers, Site infrastructure requirements, bullet 5.* - *Capacity improvements to the A132 between Rettendon Turnpike and South Woodham Ferrers, including necessary junction improvements* *A modification was made to Policy SGS 10, Site infrastructure requirements, bullet 5 in the Pre-Submission Local Plan which is consistent with the suggested amendment to read:* - *Improvements to the A132 junctions between South Woodham Ferrers and Rettendon Turnpike to increase capacity*
Comment by: National Highways. Comment ID: PSQ25-6446			
27.	Requirement for Lorry Parking allocation – close to Strategic Road Network	Lorry parking is a national problem and particularly in the East of England. National Highways would welcome the investigation and allocation of a dedicated lorry parking facility within local plans Ideally close to the SRN. If this was not possible, a policy of requiring adequate lorry parking and lay over facilities at proposed employment sites and roadside service facilities would be welcomed.	*Paragraph 7.390 of the Pre-Submission Local Plan includes reference to other complementary uses, including roadside facilities, may be appropriate on Strategic Growth Site 16b.* *The request for a specific allocation for lorry parking at this stage of the Local Plan is not feasible*

Table Item ID:	Summary Point:	Summary of detailed representation made:	Response:
			but CCC will continue to work closely with National Highways on this matter to assist them in their need to provide such facilities.
28	Use of microsimulation modelling to assess Local Plan impact along A12 corridor (as set out in AECOM note: TN02RevA and TN06 attachments)	Although not critical to the acceptability of the Local Plan at this stage, the following are recommended: - Microsimulation modelling should be used to assess the impacts of Local Plan development at A12 Junctions 17-19. - The impact of the increase in queue length on the overbridge should be considered in the junction modelling of A12 Junction 18 (unless the modelling is superseded by the microsimulation modelling currently being undertaken by a third party). - It should be clarified whether any post-opening traffic data has been collected at A12 Junction 19 for consideration within any future modelling (unless the modelling is superseded by the microsimulation modelling currently being undertaken by a third party).	*A forecast-year microsimulation modelling assessment of the A12 corridor including Junctions 17-19 has been undertaken by consultants SLR on behalf of Hammonds Farm developers. This work is currently being reviewed by CCC, ECC and National Highways.* *The developer-led microsimulation modelling is intended to expand upon rather than supersede the strategic and local junction modelling presented in the TIA (T006), due in part, to the differences in the modelling assumptions used.*
29	How junction modelling traffic flows have been derived (as set out in AECOM note: TN02RevA)	Although not critical to the acceptability of the Local Plan at this stage, it is recommended that more information should be provided with regards to the method of deriving the junction modelling traffic flows from the traffic count data at A12 Junction 18 so that this can be checked, (unless the modelling is superseded by the microsimulation modelling currently being undertaken by a third party).	*Traffic flows used in the base junction model validation were obtained from count data collected at the junction in September 2024. 2041 forecast matrices were derived from cordoned flows taken from the Chelmsford VISUM model.* *The developer-led microsimulation modelling is not intended to supersede the junction modelling found in the TIA (T006). Despite any difference in*

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			modelling approach and assumptions used, the expectation is for overall findings/conclusions at A12 Junction 18 to be broadly consistent. However, if the detail of forecast traffic volumes and patterns at the junction require further investigation, ARCADY junction model output files and demand inputs can be provided from the TIA appraisal for further checking.
30	Reference to DfT Circular 01/2022 (as set out in AECOM note: TN02RevA)	Although not critical to the acceptability of the Local Plan at this stage, it is recommended that reference should be made to DfT Circular 01/2022 'The Strategic Road Network and the Delivery of Sustainable Development', alongside Highways England's (now National Highways) 'The Strategic Road Network: Planning for the Future (A guide to working with Highways England on planning matters)' within the modelling.	*An updated version of the TIA (T006) will be published with appropriate references made within the modelling to the DfT Circular 01/2022 alongside Highways England's (now National Highways) 'The Strategic Road Network: Planning for the Future'.*
31	Updating of the IDP (as set out in AECOM note: TN02RevA)	The Infrastructure Delivery Plan (IDP) should be updated to reflect the preferred option strategy and any mitigation measures identified on the National Highways network should be included.	*The IDP has been updated to reflect the latest Local Plan and the currently identified mitigation measures.*

Appendix 3: Letter from Promotors of Growth Site Policy 11c – Land west of Barbrook Way, Bicknacre (October 2024)

Appendix 3 - Letter from Welbeck Land regarding access to Barbrook Way (Site Allocation 11c)

WELBECK STATEGIC LAND V LIMITED

6TH FLOOR, ONE LONDON WALL, LONDON, EC2Y 5EB TEL: 020 7529 3800

By email only:
Jeremy.Potter@chelmsford.gov.uk

28th October 2024

Dear Jeremy,

Re: Land West of Barbrook Way, Bicknace (Draft Allocation 11c)

Further to our discussions, I write in relation to the above draft allocation, and in response to some third party comments received as part of the Preferred Options Consultation on the Local Plan Review that closed in June 2024. It is understood that concerns have been raised in relation to access being deliverable from Barbrook Way. This Statement seeks to provide comfort that the site is deliverable.

For context prior to entering the Promotion Agreement for the land Welbeck Land undertook significant due diligence into potential access points for the development. This included a detailed topographical survey and significant investigation into any legal issues related to land ownership.

The results of our highways search would indicate the extent of the adopted highway does not include this sliver of land albeit due diligence is ongoing to see if the underlying s38 agreement for Barbrook Way can be secured in order to check that the highways search result is correct and the sliver of land is not, indeed, adopted.

We have also undertaken detailed investigations into any potential third parties (persons or entities) that may be able to successfully claim ownership of the land. Our research has not identified any such party that could realistically make such a claim. With this information we have been able to secure an indemnity insurance policy which benefits the development site, successors in title, service providers and alike to protect against the risk, however slim, of any third party either seeking to claim ownership of the third party strip and being successful in doing so.

These indemnity insurance policies exist precisely for such scenarios which are not unusual, particularly given errors in the mapping on Land Registry UK, often owing to many of the boundaries being drawn historically. Therefore, we strongly believe that the Council should consider this sufficient to demonstrate that the site is deliverable, and there is no reason to discount it or remove its allocation for housing in the forthcoming Plan.

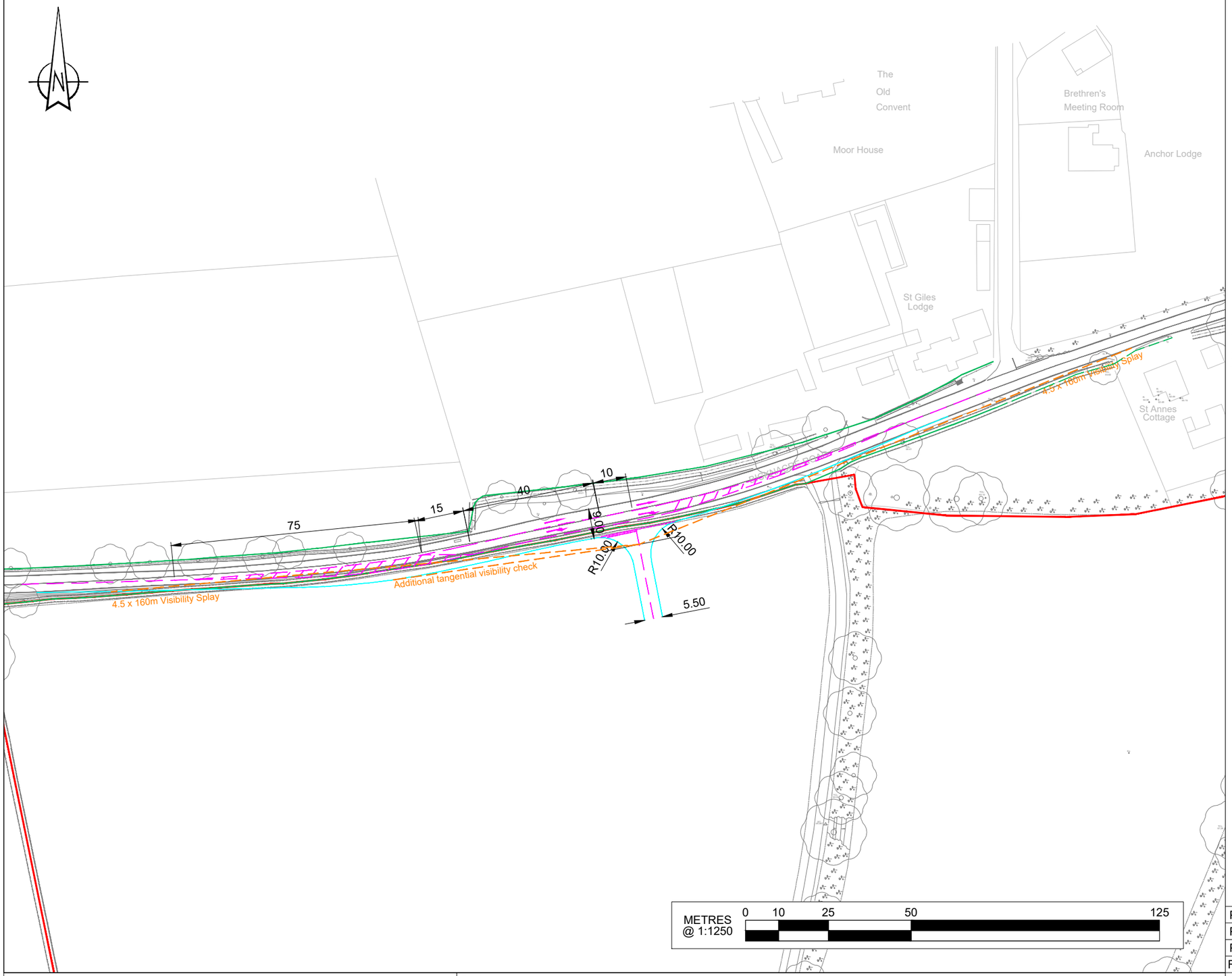
Furthermore, and as provided to the Council we have to date produced several indicative masterplans of varying scale from 160 to 250 dwellings. Given our confidence in our ability to rely on Barbrook Way we have indicated this as our primary access.

However, our detailed investigations have demonstrated that alternative access points are available from Priory Road. Although it is acknowledged that this is not the Council's preferred option, it does

assist in demonstrating that the site is not ransomed. Enclosed are the alternative options for information.

Yours sincerely

Alice Lack MRTPI
Director
Welbeck Strategic Land V Limited



NOTES:

1. Do not scale from this drawing, work to figured dimensions only.
2. Dimensions are in metres unless stated otherwise.

KEY:

4.5m x 160m Visibility Splay*

Highway Boundary confirmed by ECC

Interpolated Highway Boundary subject to confirmation by ECC

*Table 2.10 DRMB CD109 design speed 85kph (see below). Based on speed survey data of 85th percentile Eastbound: 76.2kph (Eastbound), 79.5kph (Westbound), August 2024

Table 2.10 Design speed related parameters

Design speed kph	120	100	85	70	60	50	V2/R
Stopping sight distance (metres)							
Desirable minimum	295	215	160	120	90	70	-
One step below desirable minimum	215	160	120	90	70	50	-

Designed in accordance with DMRB CD 109, CD123 and Essex Design Guide. See above for design speed

REV	DESCRIPTION	DRN	CHK	APP	DATE
P03	Amended Location	GR	PC	PC	11.10.24
P02	Confirmation of Highway and Site Boundaries	GR	MN	PC	11.09.24
P01	Initial	GR	PC	PC	28.08.24

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Project: Bicknacre

Title: Site Access Ghost Island
Bicknacre Road

Client: Welbeck Land

Status: INITIAL

Status Code: -

Drawn	GR	27.08.2024
Designed	GR	27.08.2024
Checked	PC	28.08.2024
Approved	PC	28.08.2024

Scale: 1:1250@A3

Revision: P03

Project No.: 109436-XXXX-DR-H-000003



NOTES:

1. Do not scale from this drawing, work to figured dimensions only.
2. Dimensions are in metres unless stated otherwise.

KEY:

4.5m x 160m Visibility Splay*

Highway Boundary

*Table 2.10 DRMB CD109 design speed 85kph (see below). Based on speed survey data of 85th percentile Eastbound: 76.2kph (Eastbound), 79.5kph (Westbound), August 2024

Table 2.10 Design speed related parameters

Design speed kph	120	100	85	70	60	50	V2/R
Stopping sight distance (metres)							
Desirable minimum	295	215	160	120	90	70	-
One step below desirable minimum	215	160	120	90	70	50	-

Designed in accordance with DMRB CD 109, CD123 and Essex Design Guide. See above for design speed

REV	DESCRIPTION	DRN	CHK	APP	DATE
P02	Confirmation of Highway and Site Boundaries	GR	MN	PC	11.09.24
P01	Initial	GR	PC	PC	28.08.24

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Chelmsford City Council

Appendix Ci Pre-Submission List of Respondents (Organisations)

Anglian Water Services Ltd

Barratt Redrow

BDW Eastern Counties (c/o Strutt and Parker)

Bellway Homes Ltd

Black Notley Parish Council

Bloor Homes (Eastern)

Boreham Bowling Club

Boreham Conservation Society

Boreham Parish Council

Brentwood Borough Council

Broomfield Parish Council

Chelmer Valley Landscape Group

Chelmsford Canoe Club

Chelmsford Civic Society

Chelmsford Diocese Board of Finance

Chelmsford Garden Community Consortium

Chelmsford Garden Community Council

Chelmsford Rivers and Canal Link group (CRACL)

Churchill Living and McCarthy Stone

CJH Farming Ltd

CPRE Essex

Crest Nicholson

Crest, Dandara, and TWSL

Croudace Homes

Dandara

Dandara Eastern

Defence Infrastructure Organisation (DIO)

Dominus Chelmsford Limited

East of England Ambulance Service NHS Trust

Environment Agency

Essex & Suffolk Water

Essex Alms Housing

Essex County Council

Essex County Fire and Rescue Service

Essex Police

Essex Waterways Ltd

Essex Wildlife Trust

Exolum Pipeline System Ltd

Ferio Planning Limited

Gay Bowers Limited

Gladman Developments Ltd

Gleeson Land

GMD Solutions

Great Baddow Parish Council

Great Waltham Parish Council

Greystoke CB

Hallam Land Management

Halley Development

Harris Strategic Land Limited

HEVF Self Storage UK Limited

Higgins Group

Highgate Capital Limited

Hill Residential Ltd

Historic England

Home Builders Federation

Hopkins Homes Ltd

J & T Wardrop and the Wardrop Trust

J Group and Landvest

Landvest Developments Ltd

Langford and Ulting Parish Council

Little Baddow Society

Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group

M Scott Properties Ltd

Maldon District Council

Martin Grant Homes

Mid and South Essex Integrated Care Board (ICB)

National Grid Electricity Transmission

National Highways

National Trust

Natural England

Newell Properties Development Ltd

NHS Property Services Ltd

Obsidian

Obsidian Strategic Asset Management Ltd

Pigeon (Sandon) Ltd

Princes Road Allotment Association

Ptarmigan Chelmsford A Limited

Richborough

Rochford District Council

Rosehart Properties Ltd

Roxwell Parish Council

Savills on behalf of ARU

Saxtons 4x4

South Woodham Ferrers Town Council

Sport England

Strutt and Parker (Farms) Limited

Swifts Local Network: Swifts & Planning Group

Tarmac

Taylor Wimpey Strategic Land

Telereal Securitised Property GP Limited

The Woodland Trust

Theatres Trust

This Land Limited

Transport for London

Tritton Farming Partnership LLP

Urban Provincial

Uttlesford District Council

Vistry Group

W & H Marriage & Sons Limited

Wates Developments and Hammonds Estates LLP

Wates Developments Limited

Welbeck Strategic Land V Limited

Woodham Ferrers & Bicknacre Parish Council

Woodham Walter Parish Council

Writtle Parish Council

Appendix D

Chelmsford Local Plan

Focused Consultation Additional Sites (Regulation 19) Document

You Said We Did Feedback Report

May 2026

Our Planning Strategy 2022 to 2041

Chelmsford Local Plan

Additional Sites Consultation Document You Said, We Did Feedback Report

Contents

Abbreviations **2**

Executive Summary **4**

Introduction **9**

Section 1: Summary of Consultation Undertaken **10**

Section 2: Summary of Representations Received **12**

Section 3: Summary of the main issues raised **16**

Appendix 1: Organisations consulted and copies of key consultation materials **73**

Appendix 2: Essex Highways Local Plan Additional Sites – Response to Representations (March 2026) **179**

Abbreviations

Abbreviation	Definition
BNG	Biodiversity Net Gain
BREEAM	Building Research Establishment Environment Assessment Method
CCC	Chelmsford City Council
CGC	Chelmsford Garden Community
CFS	Call For Sites
CIL	Community Infrastructure Levy
CNEB	Chelmsford North East Bypass
DFD	Development Framework Document
DtC	Duty to Co-operate
dpa	Dwellings per annum
DSB	Defined Settlement Boundary
ECC	Essex County Council
EA	Environment Agency
ELR	Employment Land Review
EPOA	Essex Planning Officers Association
Essex Police DOCO	Essex Police Designing out Crime Office
EV	Electric Vehicle
FRA	Flood Risk Assessment
GI	Green Infrastructure
GS	Growth Site
GTAA	Gypsy and Traveller Accommodation Assessment
HGV	Heavy Goods Vehicle
HIA	Heritage Impact Assessment
HRA	Habitats Regulations Assessment
IDP	Infrastructure Delivery Plan
IIA	Integrated Impact Assessment
LCWIP	Local Cycling and Walking Infrastructure Plan
LNRS	Local Nature Recovery Strategy
LPA	Local Planning Authority
LVIA	Landscape Visual Impact Assessment
MMO	Marine Management Organisation
MRA	Minerals Resource Assessment
NP	Neighbourhood Plan
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
PRoW	Public Right of Way
RAMS	Recreational disturbance Avoidance Mitigation Strategy
SANG	Suitable Alternative Natural Greenspace
SEND	Special Educational Need and Disabilities
SFRA	Strategic Flood Risk Assessment
SGS	Strategic Growth Site
SHELAA	Strategy Housing and Employment Land Availability Assessment
SHNA	Strategic Housing Needs Assessment

Abbreviation	Definition
SPA	Special Policy Area
SRN	Strategic Road Network
SuDS	Sustainable Drainage Systems
SWF	South Woodham Ferrers
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
VDS	Village Design Statement
WCS	Water Cycle Study
WRC	Water Recycling Centre
WWTW	Waste Water Treatment Works

Executive Summary

This report sets out:

- Summary of the Focused Consultation Additional Sites (Regulation 19) Document (Additional Sites Document for short) (Section 1)
- Summary of representations received (Section 2)
- Summary of the main issues raised in the responses received on the Additional Sites Document and a high-level summary of CCC's response to the comments made, and where relevant, how they have informed any minor modifications proposed by CCC to be submitted to the Inspector examining the Plan (Section 3).

It supersedes the Focused Consultation Additional Sites (Regulation 19) Document Feedback Report published in March 2026.

The Additional Sites Document was the fourth formal stage in the preparation of the Review of the adopted Chelmsford Local Plan. It outlined additional site allocations for inclusion within the review of the Local Plan to ensure that sufficient land is identified. The additional sites comprised 11 new housing sites, three expanded housing sites and one expanded employment site. An additional sites development trajectory and key consequential plan changes arising from the additional sites allocation policies were also included in the consultation.

About the Consultation

A comprehensive seven-week programme of consultation took place during the formal consultation period from 10am on 20 November 2025 to 4pm on 8 January 2026. The consultation was promoted through a range of activities including email/letter notifications to more than 10,100 contacts registered on the Council's Consultation Portal, on the Council's website, adverts in local publications, site notices and social media. Consultation activities included placing consultation documents on deposit at the Council's Customer Service Centre, targeted presentations, stakeholder co-operation meetings and public exhibitions.

Summary of responses to the Additional Sites Document

A total of 1,082 duly made comments were received to the consultation from 780 respondents, including a petition signed by 178 individuals. The respondents are from a wide variety of groups and individuals including residents, developers, landowners and their agents, businesses and statutory bodies such as other local authorities and Parish/Town Councils. All the comments received can be viewed on the Council's Consultation Portal. An overview of the main issues raised to the plan is provided below:

- A good level of feedback was received, ranging from general comments to observations on detailed policy wording
- Most Government agencies or national bodies support the plan outright or offer qualified support subject to some minor proposed amendments to some sites

- Parish Councils mainly oppose, with many suggesting changes including the deletion of site allocations
- Most public comments were objecting to one or more of the additional sites, though there was limited support
- Mix of support and opposition to the proposed changes to the development requirements (Policy S6) and the Spatial Strategy (Policy S7)
- Concerns that the Spatial Strategy (Policy S7) is too reliant on larger strategic sites particularly the Garden Communities, has an insufficient supply buffer, doesn't meet the housing needs in the Standard Method, and is too reliant on windfall sites
- Concern there is not enough employment sites to align with the housing growth proposed
- Concerns there are not enough small site housing allocations which does not accord with national policy requirements
- Calls from developers for Green Belt, Grey Belt and Green Wedge reviews to identify sustainable development opportunities in these areas
- Concern over the build out rate and delivery periods for sites from the development industry
- Some in the development industry call for an immediate/earlier review of the plan to meet housing needs in full as soon as possible
- Some detailed wording changes requested to site policies from minor changes to the deletion of policy requirements
- Broad support from the promoters of allocated sites with some requests for higher capacities, larger site areas, and policy requirement changes
- Some further alternative site allocations promoted by landowners/developers at a range of site sizes and locations
- High level of objections to some site locations in particular Land west of Patching Hall Lane (SGS19) which received a petition against it, Land west of Barbrook Way in Bicknacre (SGS11c) and the three sites in East Hanningfield (SGS17c, SGS17d, GS17e), for multiple reasons including traffic, infrastructure, landscape and flood risk impacts and calls for their removal
- Concerns from Broomfield and Boreham Parish Councils and the public that some site allocations do not reflect 'made' or progressing Neighbourhood Plans
- Criticism from some Parish Councils and the public regarding the consultation including a lack of adequate engagement, inaccessible information and that the process for making comments was too complicated.

Commentary on main issues raised and CCC response

The 'CCC response' tables provide a high-level response to the main issues raised within the comments throughout this report. A high-level commentary on the main issues raised in the representations to the Additional Sites Document is set out below:

Site allocations

- The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan

preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process. With the inclusion of the additional sites identified in this Additional Site Document the development requirements can be met within the Local Plan without needing to undertake a Green Belt review. This approach accords with National Planning Guidance, the adopted Local Plan, and the evidence base

- Impacts on the historic environment and landscape will be minimised through the masterplanning and mitigation strategies. The flood risk assessment shows that development would be directed to the areas at lowest risk of flooding. A wide range of site infrastructure is proposed through the requirements of the policy.

- Sites are supported by the plan evidence base including a Strategic Flood Risk Assessment, Landscape Sensitivity, Archaeology Assessment and Capacity Study, Heritage Impact Assessment, and traffic modelling. The Additional Sites Housing Site Studies (October 2025) considers that there are no overriding site constraints which mean that the sites are unsuitable or undeliverable.

- Site allocations are strategic matters for the Local Plan, but where applicable the made Neighbourhood Plans include detailed design and other guidance which can influence future detailed development proposals and planning applications.

- Where relevant minor modifications will be proposed to sites which are set out in the Schedule of Proposed Modifications (May 2026) which will accompany the Plan when submitted for Examination.

Consequential Changes - Housing and Employment requirement and delivery

- At the time the Pre-Submission Consultation was carried out (using the Council's Five-Year Housing Land Supply Methodology - April 2024) the Council could demonstrate a Five-Year Housing Land Supply at the point of submission of the Plan. Following the Pre-Submission Consultation the Council's Five-Year Housing Land Supply (based on the August 2025 Housing Site Schedule) showed that at the point of submission (Years 2 – 6) it was estimated to be 8,010 dwellings. Using the August 2025 Housing Site Schedule, it was estimated that the housing requirement figure for the Five-Year Housing Land Supply calculation would be 1,622 dwellings per annum on submission. This was based on the proposed Housing Requirement figure of 1,210 dwellings per annum, the estimated shortfall in housing completions from the new base period of the emerging Local Plan (1,672 dwellings) and the required 5% buffer to ensure choice and competition in the market for land. Based on these figures this would only be 4.93 years of housing land supply (8,010/1,622) on submission. As a result of this the Council undertook an Additional Site Consultation which seeks to rectify this situation and demonstrate that the Local Plan will meet its Five-Year Housing Land Supply

at the point of submission. Using the latest housing supply figure in the April 2026 Housing Site Schedule (8,962), and the updated housing requirement figure (including the actual shortfall of 1,783 dwellings that reflects 407 net new completions in 2025/26), the revised Five-Year Housing Land Supply Calculation including a 5% buffer is 5.45 years (8,962/1,645). The housing requirement in the plan meets at least 80% of the revised standard method housing need in line with the Government's latest plan-making transitional arrangements. This is consistent with the NPPF's objective of preparing and maintaining up to-date plans in order to make consistent provision for housing and other needs.

- There is no longer a national requirement for a supply buffer to be allocated with the risks to supply instead managed through the need to maintain a 5-year land supply and the Housing Delivery Test. A range of development quantums, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. The NPPF directs Local Planning Authorities to consider historic windfall delivery rates. The Submission Housing Topic Paper shows trends over a considerable length of time and that assumed average rates are below the actual average allowing a higher figure to be predicted. The 'small sites' (under 1ha) are an important part of the Plan to ensure delivery of a variety of sites in a timely manner. This is not only to be met through allocations, but also a combination of windfall sites and custom build housing.

- Delivery rates are set out in the Local Plan Housing Trajectory and are established through the Council's Five-Year Housing Land Supply Methodology. The Trajectory is updated annually, and the Additional Sites Document used the latest available Housing Site Schedule (August 2025). Minor modifications will be proposed to the Trajectory to reflect the latest published Housing Site Schedule ahead of submission (April 2026). A number of Strategic Growth Sites rolled forward from the adopted Local Plan including greenfield sites have planning permission or resolutions to grant planning permission including North of South Woodham Ferrers, North of Broomfield and North East Chelmsford.

- The plan exceeds the minimum employment requirements in the Chelmsford Employment Land Review (including the 2023 Report and Focused Update 2024) over the plan period through flexible site allocations across a range of different locations and sizes alongside existing commitments.

Duty to Co-operate and Consultation

- Key bodies were consulted on strategic matters, including Essex County Council, adjoining local authorities, Historic England, Natural England, and the Environment Agency. A total of 7 of these bodies responded to the consultation. Although the formal Duty to Co-operate has now been removed, the Council has co-operated with a range of bodies on strategic planning

matters on an on-going basis as evidenced in the Duty to Co-operate Position Statements (evidence base documents DTC001, DTC002 and DTC005), and Statements of Common Ground including those with adjoining authorities who had previously asked for their unmet needs to be considered. A Statement of Co-operation will be published to accompany the Local Plan Submission.

- The consultation exceeded requirements set out in legislation and the Council's Statement of Community Involvement. A full schedule of engagement activity is included in Section 1 of this report, and included direct notification, events, and publications which are included in Appendix 1. In addition, detailed step-by-step guidance for using the consultation portal was published specifically to guide users on how to make comments on the consultation events.

Next Steps

This report, and the previous Pre-Submission Regulation 19 Document 'You Said We Did' Feedback Report, will be presented in the Regulation 22 Consultation Statement which will accompany the plan when submitted for Examination.

Introduction

The Focused Consultation Additional Sites (Regulation 19) Document (Additional Sites Document for short) was the fourth formal stage in the preparation of the Review of the adopted Chelmsford Local Plan. It outlined additional site allocations for inclusion within the review of the Local Plan to ensure that sufficient land is identified. The additional sites comprised 11 new housing sites, three expanded housing sites and one expanded employment site. An additional sites development trajectory and key consequential plan changes arising from the additional sites allocation policies were also included in the consultation.

The consultation was undertaken in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and was preceded by a Pre-Submission Local Plan, which was also undertaken in accordance with Regulation 19 earlier in 2025, and an Issues and Options consultation in 2022 and Preferred Options consultation in 2024 both undertaken in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Purpose of this 'You Said We Did' Feedback Report

This report sets out the consultation feedback received on the Focused Consultation Additional Sites document from a wide variety of groups and individuals including:

- Residents
- Developers/landowners and their agents
- Businesses
- Statutory bodies such as local authorities, Parish/Town Councils and utilities.

This report is constructed in four parts:

- An Executive Summary includes an overview of the main issues and a commentary on them
- Section 1 provides a summary of the consultation undertaken
- Section 2 gives a summary of the representations received
- Section 3 provides a summary of the main issues raised in the responses received on the Additional Sites Document and a high-level summary of CCC's response to the comments made, and where relevant, how they have informed any minor modifications proposed by CCC to be submitted to the Inspector examining the Plan. The report is set out in Additional Sites Document order and therefore the policy numbers may not be in sequence.

This report supersedes the Focused Consultation Additional Sites (Regulation 19) Document Feedback Report published in March 2026.

Section 1: Summary of Consultation Undertaken

A comprehensive seven-week programme of consultation took place during the formal consultation period from 10am on 20th November 2025 to 4pm on 8th January 2026.

This programme of consultation followed (and exceeded) the requirements set out in legislation, and the commitments in the Council's adopted Statement of Community Involvement (November 2025).

The documents published for consultation on 20th November were:

- Focused Consultation Additional Sites (Regulation 19) Document; and
- Integrated Impact Assessment Focused Additional Sites (Regulation 19) Addendum (subject of a separate Feedback Report).

These documents were placed on deposit at CCC Customer Service Centre, with electronic versions available to view at most Parish/Town Council offices and local libraries across Chelmsford.

The Council notified more than 10,100 contacts registered on its Consultation Portal. These included the public, statutory agencies such as Essex County Council and Town/Parish Councils, utility companies, businesses, interest groups, and voluntary and community bodies. Council Members and staff were also notified.

A number of consultation events were arranged:

- Three staffed exhibitions, visited by 30 attendees
- 15 days of unstaffed exhibitions
- Four pop-up displays for the whole consultation period
- Targeted presentations including a Parish/Town Council Forum, Agent/Developers Forum and Local Authority Duty to Co-operate meeting
- A bespoke Local Plan video, attracting 1,200 views since its launch in 2024.

Printed/online materials and advertisements were produced as follows:

- Web page with the consultation documents and links to supporting information including the exhibition panels, attracting 5,270 visits
- Advertisement in a local newspaper (Essex Chronicle), and the South Woodham Focus (independent community magazine)
- Information packs for all of Chelmsford's 29 Parish/Town Councils
- Three e-shot digital campaigns sent to around 15,000 subscribers
- Three City Life articles with 710 views
- Five social media posts/stories/feeds/adverts gaining over 109,000 views
- 138 posters distributed to Parish/Town Councils, CCC offices and leisure facilities, post offices, doctors' surgeries, churches and local shops
- Summary newsletters available at public exhibitions and on request
- 80 site notices placed across 11 new and four expanded proposed site allocations
- 27 digital screens at CCC venues
- Seven digital screens at bus stops
- Staff e-mail banner and website banner.

A list of organisations consulted, and copies of key consultation materials are given in Appendix 1.

Integrated Impact Assessment Focused Additional Sites Addendum

The Integrated Impact Assessment Focused Consultation Additional Sites Addendum (IIA) was also subject to consultation at the same time. The IIA brings various strands of assessment together, consisting of the Sustainability Appraisal, Strategic Environmental Assessment, Habitats Regulations Assessment, Health Impact Assessment, and Equalities Impact Assessment. Feedback on this document is summarised in a separate report prepared by the Council's IIA Consultants.

Call for Sites and Strategy Housing and Employment Land Availability Assessment (SHELAA)

In addition to the Local Plan and IIA consultations, the Council undertook a Call for Sites to identify available land for consideration for future development. Six new submissions and six amendments to existing sites were submitted through this process. These have been assessed in an updated Strategic Housing and Employment Land Availability Assessment (SHELAA).

Section 2: Summary of Representations Received

For this report, people and organisations who made a comment to the consultation are called ‘respondents’.

Methodology

Respondents had a choice of ways to make their comments, by:

- Answering questions using a stand-alone online questionnaire published on the consultation portal
- Sending written comments in an e-mail
- Sending written comments by post.

The consultation questions focused on whether the Council had met the legal requirements (including the duty to co-operate) and whether the plan meets the tests of soundness set out in the National Policy Planning Framework – that it is positively prepared, justified, effective and consistent with national policy.

Whichever method respondents used, all comments have been entered into the Council’s Consultation Portal.

Where respondents did not state which section/policy or site they were commenting on, officers have assigned responses to the most relevant part of the Additional Sites Document.

If questions were not answered by a consultee selecting a box, the Council has not sought to tick any boxes to avoid any misrepresentation.

To ensure proper consideration of issues, respondents have been divided into types depending on their interface with the Council. Some fall into more than one category, so totals may exceed the overall number of respondents. Similarly, some respondents made their comments via more than one method so the totals for how comments were made is greater than the total number of comments received.

The assessment of responses is high level and focuses on the main issues raised, rather than the number of representations to any individual question. Where many people have made a similar main issue, these have been summarised as one main issue.

Overview of responses

A total of 1,082 duly made comments were received to the consultation from 780 respondents, including a petition signed by 178 individuals. The comments were received across a number of the new sites with the sites attracting the most comments being SGS11c (Barbrook Way), three sites in East Hanningfield, SGS10 (Rettendon Place), SGS18a (North West of Chelmsford), and SGS19 (West of Patching Hall Lane). The petition expresses opposition to proposed development at SGS19 (West of Patching Hall Lane).

Comments by respondent type:

Type of Respondent	Explanation	Number of Respondents
Duty to Co-operate (DTC) bodies	Key bodies consulted on strategic matters, including Essex County Council, adjoining local authorities, Historic England, Natural England, Environment Agency	7
Specific bodies/groups	Parish/Town Councils, utility bodies, health and transport consultees etc	27
General and Other bodies/groups	Voluntary groups, religious groups, housing providers, businesses etc	15
Developers/landowners	Landowners, promoters of land and their agents	46
Public	Individual members of the public	695

How people made their comments:

Method of making comments	Number of Comments	Percentage (rounded)
Online Consultation Portal	445	41%
E-mail	461	43%
Letter	176	16%

The number of representations made to each question are shown in the tables below. These record where people selected an option, and/or where they made a written comment. The figure in brackets represents the percentage of total representations. It should be noted that the number of responses received to each question will not amount to the totals set out above as people did not have to answer every question.

Question 1: Do you consider the Local Plan legally compliant in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012?	
	Reps received
Yes	322 (30%)
No	103 (10%)
No Response	657 (60%)
Question 1a: Please provide an explanation below	
Response	164 (15%)
No Response	918 (85%)
Question 1b: Please set out the modifications you consider necessary to make the Local Plan legally compliant including revised wording of any policy or text.	
Response	123 (11%)
No Response	959 (89%)

Question 2: Does the Local Plan comply with the Duty to Co-operate?	
	Reps received
Yes	295 (27%)
No	123 (11%)
No Response	664 (62%)
Question 2a: Please provide an explanation below	
Response	171 (16%)
No Response	911 (84%)
Question 2b: Please outline any changes to the approach taken which you consider necessary to ensure the Duty to Co-operate is met.	
Response	131 (12%)
No Response	951 (88%)

Question 3: Do you consider the Local Plan 'sound'?	
	Reps received
Yes	70 (6%)
No	696 (64%)
No Response	320 (30%)
Question 3a: If no this is because you consider the Local Plan is NOT:	
Positively Prepared	238 (12%)
Justified	505 (25%)
Effective	540 (26%)
Consistent with National Policy	358 (17%)
No Response	412 (20%)
Question 3b: Please provide an explanation below and identify the main issues.	
Response	1,037 (96%)
No Response	45 (4%)
Question 3c: Please set out the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text.	
Response	584 (54%)
No Response	498 (46%)

Question 4: If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?	
	Reps received
Yes	139 (13%)
No	307 (28%)
No Response	636 (59%)

Question 6: Do you wish to be notified of the following:	
	Reps received
Submission of the Local Plan for Examination	429 (22%)
Publication of the Inspector's Report	444 (23%)
Adoption of the Local Plan	424 (22%)
No Response	633 (33%)

*Note that these percentages will not all total 100% as respondents were able to tick as many options as they felt applicable.

A small number of representations were received after the closing date. Those that were received by email by 11.59pm on 8 January 2026 were deemed ‘duly made’ to allow for any potential delays in emails reaching the Council’s mailbox. These have been analysed and included in the figures in this report. Others received after 8 January were deemed not ‘duly made’.

29 of the representations were partly ‘inadmissible’ due to their content, so the comments have been included but with the inadmissible part redacted. An additional 14 representations had no address details and were not accepted.

All the comments received can be viewed in full on the Council’s planning policy consultation portal.

When viewing the portal, you will see the list of recent consultation events. Events which are open for consultation show a green timeline and the word ‘open’. Those which are closed show a red timeline and the word ‘closed’.

To view comments, you need to:

- Choose the event you would like to view comments for
- Select 'learn more' to open the event page
- Click on the ‘what people say’ tab to display a list of all the comments.

You can read all comments, or sort by name or date we received them. Where additional information such as reports or maps were submitted with a comment, these are listed at the end of the comment in PDF format and can be viewed or downloaded.

You can find out more about using the consultation portal in our guidance notes.

Section 3: Summary of the main issues raised

This section contains a high-level summary of the main issues and changes requested in the Additional Sites Document order.

It specifies who has made comments from public sector bodies, infrastructure or service providers and developers/landowners in brackets at the end of relevant bullet points in the 'Summary of Representations' text. This is because it is useful to understand the nature of respondents, particularly where a stakeholder has a legal duty or responsibility over a matter that they are making comments about. It does not specify who has made comments from members of the public as to do so would result in a very long report, so bullet points from the public do not have names in brackets.

It should be noted that in some cases, members of the public raised similar points to stakeholders. To avoid duplication, these comments have not been repeated in the public comments. However, this does not affect the consultation process as this report focuses on the main issues received rather than the number of representations to any individual section of the plan.

It is important to note that this report does not summarise every representation or identify every individual detailed issue, as the purpose is to identify main issues and requested changes. In some cases a summary is included to a question where a comment was not made directly to enable issues to be fully considered, so the number of summary points may exceed the actual number of recorded responses.

Following the summary of main issues and changes requested for each Consultation Point a 'CCC Response' table provides a high-level summary of CCC's response to the comments made, and where relevant, how they have informed any minor modifications proposed by CCC to be submitted to the Inspector examining the Plan. This includes details of the key changes proposed to be made and suggestions not taken forward and why. Similarly, the 'CCC response' tables do not provide a response to each individual comment.

The Council commissioned Essex Highways to review and consider the key issues raised in the highway and transportation responses received to the consultation. This report entitled Essex Highways Local Plan Additional Sites – Response to Representations (March 2026) is given in Appendix 2 and includes a review and focused response to representations received relating to the transport modelling evidence base and key transportation issues raised. This has been used by CCC to understand and respond to matters of concern raised in this You Said We Did report and to inform any proposed modifications to the Additional Sites Document.

Summary of main issues raised to the Additional Site Document

All the comments received can be viewed in full on the Council's Consultation Portal. A high-level commentary on the main issues raised in the representations to the Additional Sites Document is set out below:

- A good level of feedback was received, ranging from general comments to observations on detailed policy wording
- Most Government agencies or national bodies support the plan outright or offer qualified support subject to some minor proposed amendments to some sites
- Parish Councils mainly oppose, with many suggesting changes including the deletion of site allocations
- Most public comments were objecting to one or more of the additional sites, though there was limited support
- Mix of support and opposition to the proposed changes to the development requirements (Policy S6) and the Spatial Strategy (Policy S7)
- Concerns that the Spatial Strategy (Policy S7) is too reliant on larger strategic sites particularly the Garden Communities, has an insufficient supply buffer, doesn't meet the housing needs in the Standard Method, and is too reliant on windfall sites
- Concern there is not enough employment sites to align with the housing growth proposed
- Concerns there are not enough small site housing allocations which does not accord with national policy requirements
- Calls from developers for Green Belt, Grey Belt and Green Wedge reviews to identify sustainable development opportunities in these areas
- Concern over the build out rate and delivery periods for sites from the development industry
- Some in the development industry call for an immediate/earlier review of the plan to meet housing needs in full as soon as possible
- Some detailed wording changes requested to site policies from minor changes to the deletion of policy requirements
- Broad support from the promoters of allocated sites with some requests for higher capacities, larger site areas, and policy requirement changes
- Some further alternative site allocations promoted by landowners/developers at a range of site sizes and locations
- High level of objections to some site locations in particular Land west of Patching Hall Lane (SGS19) which received a petition against it, Land west of Barbrook Way in Bicknacre (SGS11c) and the three sites in East Hanningfield (SGS17c, SGS17d, GS17e), for multiple reasons including traffic, infrastructure, landscape and flood risk impacts and calls for their removal
- Concerns from Broomfield and Boreham Parish Councils and the public that some site allocations do not reflect 'made' or progressing Neighbourhood Plans
- Criticism from some Parish Councils and the public regarding the consultation including a lack of adequate engagement, inaccessible information and that the process for making comments was too complicated.

Summary of CCC response to main issues raised to the Additional Sites Document

The 'CCC response' tables in this section provide a high-level response to the main issues raised within the comments throughout this report. A high-level CCC response to the main issues raised in the representations to the Pre-Submission plan is set out below:

Site allocations

- The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process. With the inclusion of the additional sites identified in this Additional Site Document the development requirements can be met within the Local Plan without needing to undertake a Green Belt review. This approach accords with National Planning Guidance, the adopted Local Plan, and the evidence base

- Impacts on the historic environment and landscape will be minimised through the masterplanning and mitigation strategies. The flood risk assessment shows that development would be directed to the areas at lowest risk of flooding. A wide range of site infrastructure is proposed through the requirements of the policy.

- Sites are supported by the plan evidence base including a Strategic Flood Risk Assessment, Landscape Sensitivity, Archaeology Assessment and Capacity Study, Heritage Impact Assessment, and traffic modelling. The Additional Sites Housing Site Studies (October 2025) considers that there are no overriding site constraints which mean that the sites are unsuitable or undeliverable.

- Site allocations are strategic matters for the Local Plan, but where applicable the made Neighbourhood Plans include detailed design and other guidance which can influence future detailed development proposals and planning applications.

- Where relevant minor modifications will be proposed to sites which are set out in the Schedule of Proposed Modifications (May 2026) which will accompany the Plan when submitted for Examination.

Consequential Changes - Housing and Employment requirement and delivery

- At the time the Pre-Submission Consultation was carried out (using the Council's Five-Year Housing Land Supply Methodology - April 2024) the Council could demonstrate a Five-Year Housing Land Supply at the point of submission of the Plan. Following the Pre-Submission Consultation the Council's Five-Year Housing Land Supply (based on the August 2025 Housing Site Schedule) showed that at the point of submission (Years 2 – 6) it was

estimated to be 8,010 dwellings. Using the August 2025 Housing Site Schedule, it was estimated that the housing requirement figure for the Five-Year Housing Land Supply calculation would be 1,622 dwellings per annum on submission. This was based on the proposed Housing Requirement figure of 1,210 dwellings per annum, the estimated shortfall in housing completions from the new base period of the emerging Local Plan (1,672 dwellings) and the required 5% buffer to ensure choice and competition in the market for land. Based on these figures this would only be 4.93 years of housing land supply (8,010/1,622) on submission. As a result of this the Council undertook an Additional Site Consultation which seeks to rectify this situation and demonstrate that the Local Plan will meet its Five-Year Housing Land Supply at the point of submission. Using the latest housing supply figure in the April 2026 Housing Site Schedule (8,962), and the updated housing requirement figure (including the actual shortfall of 1,783 dwellings that reflects 407 net new completions in 2025/26), the revised Five-Year Housing Land Supply Calculation including a 5% buffer is 5.45 years (8,962/1,645). The housing requirement in the plan meets at least 80% of the revised standard method housing need in line with the Government's latest plan-making transitional arrangements. This is consistent with the NPPF's objective of preparing and maintaining up to-date plans in order to make consistent provision for housing and other needs.

- There is no longer a national requirement for a supply buffer to be allocated with the risks to supply instead managed through the need to maintain a 5-year land supply and the Housing Delivery Test. A range of development quantums, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. The NPPF directs Local Planning Authorities to consider historic windfall delivery rates. The Submission Housing Topic Paper shows trends over a considerable length of time and that assumed average rates are below the actual average allowing a higher figure to be predicted. The 'small sites' (under 1ha) are an important part of the Plan to ensure delivery of a variety of sites in a timely manner. This is not only to be met through allocations, but also a combination of windfall sites and custom build housing.
- Delivery rates are set out in the Local Plan Housing Trajectory and are established through the Council's Five-Year Housing Land Supply Methodology. The Trajectory is updated annually, and the Additional Sites Document used the latest available Housing Site Schedule (August 2025). Minor modifications will be proposed to the Trajectory to reflect the latest published Housing Site Schedule ahead of submission (April 2026). A number of Strategic Growth Sites rolled forward from the adopted Local Plan including greenfield sites have planning permission or resolutions to grant planning permission including North of South Woodham Ferrers, North of Broomfield and North East Chelmsford.

- The plan exceeds the minimum employment requirements in the Chelmsford Employment Land Review (including the 2023 Report and Focused Update 2024) over the plan period through flexible site allocations across a range of different locations and sizes alongside existing commitments.

Duty to Co-operate and Consultation

- Key bodies were consulted on strategic matters, including Essex County Council, adjoining local authorities, Historic England, Natural England, and the Environment Agency. A total of 7 of these bodies responded to the consultation. Although the formal Duty to Co-operate has now been removed, the Council has co-operated with a range of bodies on strategic planning matters on an on-going basis as evidenced in the Duty to Co-operate Position Statements (evidence base documents DTC001, DTC002 and DTC005), and Statements of Common Ground including those with adjoining authorities who had previously asked for their unmet needs to be considered. A Statement of Co-operation will be published to accompany the Local Plan Submission.

- The consultation exceeded requirements set out in legislation and the Council's Statement of Community Involvement. A full schedule of engagement activity is included in Section 1 of this report, and included direct notification, events, and publications which are included in Appendix 1. In addition, detailed step-by-step guidance for using the consultation portal was published specifically to guide users on how to make comments on the consultation events.

Introduction

Consultation point	Total number of responses
Introduction	109

Summary of Representations – main issues and suggested modifications:

How can I have my say?

- Materials difficult for a layperson to understand
- Online system difficult to navigate, with some facing challenges logging in and submitting comments
- Consultation could have been more widely promoted
- Longer consultation period would have been helpful and running over the festive season limited ability of some to engage (Little Baddow Parish Council AS-332)
- Request for greater access to physical copies and in-person viewing opportunities and additional direct engagement would have been helpful.

Purpose of this document

- Support the Plan (Writtle Parish Council AS-60, Croudace Homes AS-408)
- Statutory bodies including ECC, the Integrated Care Board and National Grid Electricity support that CCC has maintained effective co-operation and

engagement and met its legal plan-making duty and Regulations (Essex County Council, AS-1119, Mid and South Essex Integrated Care Board AS-639, National Grid Electricity AS-900)

- Supports policy requirements to protect and mitigate impacts on the natural environment including designated sites, retention of natural landscaping and habitats, creating a network of multifunctional green infrastructure and SuDS. Greenspaces should be integral to initial design and delivered at first occupation to help mitigate recreational pressure on sensitive sites. Welcomes requirements for developers to assess impacts and to engage with Natural England on mitigation, 20% BNG target for Garden Communities and ensuring sufficient capacity for wastewater treatment and disposal. Habitat mitigation and creation requirements welcomed but should be expanded to encourage delivery of opportunities within the Essex LNRS (Natural England AS-1107)
- Additional housing could support current homelessness. Welcomes engagement regarding all future housing proposals (Essex Police DOCO AS-984)
- Inadequate evidence to demonstrate that Duty to Cooperate requirements have been met.

What evidence have we used?

- Requests that 'Education assessments for early years and childcare, primary and Secondary education' are added to the list of evidence used to inform the additional site allocation policies (Essex County Council AS-1120)
- Requests modifications to the IDP and Infrastructure Delivery Schedule to incorporate the requirement for developer funded police infrastructure and facilities associated with the proposed additional development (Essex Police AS-1032)
- Notes that the WCS Addendum correctly identifies that there are currently permitted Dry Weather Flow capacity limitations at the SWF WWTW. Great Leighs WWTW has limited headroom capacity and Chelmsford WWTW currently has available capacity. Disagrees with the WCS addendum methodology, including that a Q80 baseline should be used for Local Plan assessment and recommends a 5-year average is considered for reviewing DWF data, although does not consider that this would change the overall conclusions in the WCS (Environment Agency AS-733)
- National Highways is undertaking a worst-case sensitivity test to assess the maximum potential impact of traffic growth arising from the Local Plan growth on the A12 and its junctions, and further detailed traffic modelling on Junction 19, and is committed to ongoing work (National Highways AS-1099)
- The cancellation of the A12 DCO widening scheme will result in continued delays and queueing between junctions 17 and 19. No indication as to how effective interim measures to improve junction 19 will be. Plan should not be submitted for examination until sufficient funding secured for A12 improvements (Danbury Parish Council AS-420)
- Insufficient evidence in respect of the highway impacts of the Local Plan allocations, including the additional sites, having regard to the cancellation of the A12 widening (Richborough AS-388)

- Criticisms in relation to SHELAA e.g. scoring, incorrect boundary (Graham Weal AS-1072, Strutt and Parker (Farms) Limited AS-1124, Richborough AS-469, AS-970, Wates Developments Ltd AS-998, AS-1057, Crest Nicholson AS-1063, Higgins Homes AS-389)
- SHELAA scoring does not reflect site specific matters which can be appropriately addressed through careful design and mitigation (Cliffords Group Ltd AS-870).

CCC Response
The consultation exceeded requirements set out in legislation and the Council's Statement of Community Involvement
The Council has worked with statutory bodies to produce/update Statements of Common Ground for submission alongside the Local Plan.
The Council has co-operated with other bodies, including infrastructure providers on strategic planning matters on an on-going basis as evidenced in the Statement of Cooperation and Statements of Common Ground.
ECC Education Assessments are referenced as INF007 & INF008 in the evidence base.
The CCC Stage 3 Infrastructure Deliver Plan (IDP) has been updated (INF012).
The EA's comments on Q80 are noted however as part of the WCS, Anglian Water Services (AWS) advised that D90 DWF values should be used alongside the Q80 DWF values to provide a realistic overview of the situation within CCC administrative area in the short to medium term for the management of wastewater treatment and capacity.
Continued work with National Highways and Essex County Council has informed agreement that the Local Plan modelling to date indicates that the development in the Local Plan would have minimal impact upon the A12 and Junctions 17,18 and 19. Further modelling assessments with regards to these junctions are not required for the purposes of the Local Plan, and no modifications are required to be proposed to the Plan. With proportionate and reasonable mitigation strategies in place to support the Local Plan growth, development will ensure that severe impacts on the strategic highway network are avoided.
Consultations received regarding issues with site specific SHEAA assessments have been reviewed and where appropriate the SHELAA assessments have been updated.

Additional Site Allocation Policies

This section of the consultation document provides the additional site policies required to deliver the revised Spatial Strategy.

Location 1 – Chelmsford Urban Area

Strategic Growth Site Policy 1dd – Land at former Kay-Metzeler premises, Brook Street

Key statistics:

Consultation point	Total number of responses
Strategic Growth Site Policy 1dd – Land at former Kay-Metzeler premises, Brook Street	6

Summary of Representations – main issues and requested changes:

- Supports requirement to undertake a Mineral Infrastructure Impact Assessment given site's proximity within the Mineral Consultation Area for Chelmsford Railway Sidings (Essex County Council AS-1066)
- Supports the HIA and identified suitable mitigation measures, including limiting building height on western side of the site. Supports the inclusion of these as criteria within the policy and supporting text (Historic England AS-1000)
- Supports policy requirement for suitable flood risk management and SuDS, and contribution towards wider green infrastructure and would welcome reference to Anglian Water's Surface Water Risk Management Guidance in the reasoned justification (Anglian Water Services Ltd AS-1033)
- Existing surface water sewers within the site. Requirement to protect existing sewers and their easements should be included (Anglian Water Services Ltd AS-1033)
- Whilst sufficient dry weather flow capacity exists at Chelmsford WRC, developers to engage early with Anglian Water to assess a sustainable connection into the network (Anglian Water Services Ltd AS-1033)
- Site lies within the zone of influence of the Essex Coast RAMS and should include policy requirements to secure RAMS tariff payments (Natural England AS-1108)
- Early engagement encouraged with Essex Police DOCO for access, recreational space, car club and travel route matters (Essex Police DOCO AS-986)
- Objection to city centre housing which risks undermining the economy, overloading infrastructure, harming the environment, heritage, and urban character. The city centre should be used for retail, leisure, and employment uses, including redevelopment of the ex-gas site for such uses.

CCC Response
The Council's Infrastructure Delivery Plan (IDP) sits alongside the Local Plan. This assesses the current status of infrastructure across Chelmsford and identifies what new infrastructure investment is required to support the Local Plan growth, when it is needed, and funding sources.
Reference to RAMS was removed from each qualifying allocation in the Plan Review to avoid repetition. Explanatory text is set out in policies S4 and DM16. Natural England agreed this in a signed SOCG dated December 2024, and have reaffirmed this position.

The Council notes the comments from Essex Police and encourages early engagement with the Design Out Crime Officer to address access, recreational space, car club provision and travel route matters.
The site is proposed for allocation to support increased housing requirements. The regeneration of brownfield land within the city centre is suitable for development and sustainably located for residential use.
In order to safeguard the existing easements on site, a modification to both the site policy and reasoned justification restricting layout near easements is proposed.

Location 18 – North West Chelmsford

Strategic Growth Site Policy 18a – Land North West of Chelmsford (North of Hollow Lane)

Key statistics:

Consultation point	**Total number of responses**
Strategic Growth Site Policy 18a – Land North West of Chelmsford (North of Hollow Lane)	58

Summary of Representations – main issues and requested changes:

- Supports proposed allocation and confirms that it is available, suitable and deliverable (Dandara AS-1133)
- Policy should be amended to approximately 160 homes to reflect the true development capacity of site (Dandara AS-1133)
- No designated heritage assets within the site, although it is within the wider setting of a number of listed buildings. Supports the HIA and identified suitable mitigation measures included within the policy and supporting text (Historic England AS-1001)
- Supports policy requirement for suitable flood risk management and SuDS, and network of multifunctional green infrastructure and would welcome reference to Anglian Water's Surface Water Risk Management Guidance in the reasoned justification (Anglian Water Services Ltd AS-1090)
- Whilst sufficient dry weather flow capacity exists at Chelmsford WRC, developers to engage early with Anglian Water to assess a sustainable connection into the network (Anglian Water Services Ltd AS-1090)
- Supports the requirement for development to accord with a masterplan approved by CCC. Masterplan will need to provide more clarity on the elements of landscape character in need of conservation (Essex County Council AS-1069)
- Supports requirement for strong buffers/heritage and PRoW enhancements. Policy should be amended to reference the opportunities for connectivity beyond the site, which could be achieved by having regard to the LNRS (Essex County Council AS-1067)
- A green buffer alongside woodland to the north should be required to conserve its setting (Essex County Council AS-1069)
- Supports requirement for a MRA (Essex County Council AS-1069)

- Site lies within the zone of influence of the Essex Coast RAMS and should include policy requirements to secure RAMS tariff payments (Natural England AS-1109)
- The special features and characteristics of the buildings and rural setting of the Chignal Villages should be respected in accordance with the Chignal VDS as Supplementary Planning Guidance supporting the Local Plan (Chignal Parish Council AS-964)
- Objects to the proposed change to include site in Chelmsford's urban area boundary. Any development north of Hollow Lane would encroach on open countryside and there are no natural or artificial boundaries to contain further urban expansion (Chignal Parish Council AS-964)
- Development would degrade the rural landscape and settings of Broomwood Lodge, registered as a Building of Local Value, listed buildings to the south west, and the non-designated heritage assets of Kilnfield Barns, the cluster of former agricultural buildings to the north west of the site (Chignal Parish Council AS-964)
- Loss of an established green buffer. Development will have urban/rural boundaries on three sides, visible from the extensive footpath network to the North, East and West. Proposed buffers are not sufficiently wide to mitigate harm (Brumfelda - Broomfield's Local History Group AS-710)
- The section of Hollow Lane is historic and displays many characteristics of a Protected Lane and proximity of a modern housing estate would have a huge impact on its historic character. Concerns over retaining the setting of Priors (Brumfelda - Broomfield's Local History Group AS-710)
- Development would add to the localised landscape damage resulting from the proposed nearby Norwich to Tilbury overhead line and pylons. These would also likely reduce property prices within the allocation and could impact viability (Brumfelda - Broomfield's Local History Group AS-710)
- Development would result in loss of Grade 2 agricultural land (Chignal Parish Council AS-964, Brumfelda - Broomfield's Local History Group AS-710)
- Concerns that existing infrastructure, including transport, education, healthcare, flood prevention, employment opportunities, telecommunication, utilities, and other facilities cannot support the proposed scale of this development, individually or cumulatively alongside other proposed developments (Chignal Parish Council AS-964, Brumfelda - Broomfield's Local History Group AS-710)
- Concerns over increase in traffic, capacity and safety of road network (including for pedestrians and cyclists), including in relation to Chignal Road, Hollow Lane, Woodhall Hill, Woodhall Hill/Hollow Lane junction, Roxwell Road/Chignal Road junction, Patching Hall Lane, School Lane, Copperfield Road and Oliver Way (Chignal Parish Council AS-964, Brumfelda - Broomfield's Local History Group AS-710)
- Junction modelling appraisal (T007) does not address wider highway network inadequacies, including reduced two-way link capacity in Patching Hall between Broomfield Road and Sunrise Avenue due to on-street parking
- Concerns that traffic modelling during peak hours and school times has not been carried out
- Insufficient parking provision risks overspill onto neighbouring streets
- Insufficient public transport provision will lead to car-dependency

- Development would lead to loss of valuable open views
- Failure to demonstrate landscape enhancement or effective mitigation and landscape buffers not achievable
- Scale, design and density are not in keeping with surrounding development
- Area close to the site is identified as having Romano-British archaeological remains
- Concerns that development would lead to loss of hedgerows, mature trees (including TPO), countryside, green space, habitats, wildlife and biodiversity
- Rural landscapes and habitats around Chelmsford that fall outside Green Belt and other statutory protections have been consistently under valued
- Concerns over dense housing with little or no options to create an inclusive natural environment and high quality green infrastructure, including lack of evidence in respect of BNG
- Increased pollution including air, light, noise and waste management
- Loss of public footpaths crossing the site used by local residents
- Increased density will lead to loss of privacy
- No nearby employment opportunities, so residents will need to rely on private cars, which is unsustainable
- Hollow Lane already experiences surface water flooding and development would exacerbate issues. Given clay soils, below-ground soakaways are unlikely to work and surface water would need to be managed through ponds, underground storage tanks or swales and ditches, either on or off site
- The expansion of Newlands Spring Primary School would impact the open space for the school
- Concerns regarding the disruption of construction, including dust, power cuts, and damage caused by and safety issues arising from HGVs
- Concerns over site selection process - lack of site-specific justification in the Council's consultation material on how the site has been assessed against other alternatives and the combined impact of sites in the area
- Impose height, scale and frontage requirements on new development and specify a minimum landscaped buffer width along the Hollow Lane boundary
- Further assessments required including in respect of mineral resources, archaeological findings, flood risk measures and protection of PRoW
- Need for substantial landscape buffers to Chobbing’s Farm, Broom Wood and Hollow Lane in order to create a softer edge that reflects the area’s historic character
- Land North West of Chelmsford urban area should be designated as Green Wedge to prevent further development and urban sprawl into the Broomfield parish
- Allocation should be reconsidered or removed from the Local Plan and sustainable brownfield alternatives and/or other more sustainable sites should be considered first.

CCC Response
The use of the ‘around’ housing figure would allow for a higher density development to be brought forward where this addresses site constraints and conforms with other policies in the plan as a whole.

To avoid duplication in the Plan, rather than modifying all site policies, a minor modification will be proposed to the reasoned justification of Policy DM18 to include reference to Anglian Water's Surface Water Risk Management Guidance.
Reference to opportunities set out in the LNRS to connect and contribute to wider Green Infrastructure network is covered by Strategic Policy S4, Strategic Policy S9, and Policy DM16 of the Pre-Submission Plan in relation to the LNRS; and also DM16 in relation to the Essex Green Infrastructure Strategy. There is no need to propose a modification to the Plan.
Reference to RAMS was removed from each qualifying allocation in the Plan Review to avoid repetition. Explanatory text is set out in policies S4 and DM16. Natural England agreed this in a signed SOCG dated December 2024, and have reaffirmed this position.
The reasoned justification includes the need to retain a buffer to the north of the site, south of Broom Wood.
The Additional Sites - Landscape Sensitivity and Capacity Study (PL013), Additional Sites - Heritage Assessments Technical Note October 2025 (PL014), and Additional Sites - Archaeological Impact Assessment October 2025 (PL015) have informed the site requirements for landscape, heritage and archaeology. The full details of these will be considered as part of the future masterplan and planning application for the site in accordance with wider Local Plan policies DM13, DM14 and DM15.
To meet our development needs it is inevitable that some agricultural land will be used for development.
The Council's Infrastructure Delivery Plan (IDP) sits alongside the Local Plan. This assesses the current status of infrastructure across Chelmsford and identifies what new infrastructure investment is required to support the Local Plan growth, when it is needed, and funding sources.
The height, scale and design of the development will be considered in detail as part of the future masterplan and planning application for the site.
The Council commissioned Essex Highways to review and consider the key issues raised in the highway and transportation responses received to the consultation. This is given in Appendix 2 and includes a review of representations received from members of the public. Essex Highways response has been used by CCC to understand and respond to matters of concern raised in this You Said We Did report and to inform any proposed minor modifications to the Local Plan.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
The site will be required to comply with wider Local Plan policy requirements, including the need to protect existing trees, improve biodiversity and green infrastructure as set out in policies DM16 and DM17.
The suite of policies in the Plan seek to protect the character of landscapes and ensure suitable drainage and SuDS support development.
The site allocation is supported by the plan evidence base including Strategic Flood Risk Assessments, Sequential and Exception Test, Water Cycle Studies.
Other proposed development sites are dealt with in the consideration of Strategic Policy S7 and addressed by the Pre-Submission Integrated Impact Assessment and the Integrated Impact Assessment Focused Additional Sites Addendum.
The policy requires existing PRoW to be protected.

The Green Wedge designation follows the valleys of the River Wid, River Can and River Chelmer. The purpose of the Green Wedge is to maintain and protect the open character of the landscape of the river valleys, to provide physical links between the urban area of Chelmsford and the countryside beyond, to provide an important network of natural habitats and various formal and informal leisure and recreation uses. It relates to land within the river valleys and does not extend to other parcels of land so it would not be appropriate to consider extending the designation to this location.
Any expansion of Schools will need to comply with relevant open space/sports pitch requirements for Schools.
Any impact on amenities from construction activity is a relative short term impact which can be managed by appropriate planning conditions as part of any future planning application.

Location 19 – Land West of Patching Hall Lane

Strategic Growth Site Policy 19 – Land West of Patching Hall Lane

Key statistics:

Consultation point	**Total number of responses**
Strategic Growth Site Policy 19 – Land West of Patching Hall Lane	229

Summary of Representations – main issues and requested changes:

- Supports proposed allocation, which is available and deliverable, and supports housing trajectory for the site. Site should be expanded to include land to the north and west which may assist in bringing forward an improved scheme (Bellway Homes Ltd AS-259)
- Requests amendment to clarify that the site should require either on-site sports provision or financial contributions to off-site facilities (not both), and remove the requirement for on-site formal sports provision given the site's size and proximity to existing facilities (Bellway Homes Ltd AS-259)
- Supports policy requirements for strong green buffers, PRoW enhancements and appropriate habitat mitigation. Policy should be amended to reference the opportunities for connectivity beyond the site, which could be achieved by having regard to the LNRS (Essex County Council AS-1070)
- Supports the requirement for development to accord with a masterplan approved by CCC. Masterplan needs to provide clarity on which elements of landscape character needs conservation and suggest that any PRoW running through the site should be incorporated into naturalistic green corridor to conserve their character (Essex County Council AS-1071)
- Consideration should be given to limiting building heights to two storeys close to open countryside rather than two and a half (Essex County Council AS-1071)

- Policy requirement for a MRA should be removed (Essex County Council AS-1071)
- Welcomes reference to promoting and enhancing active and sustainable modes of transport. Seeks consideration in the masterplan for the opportunity to enhance bus access to the city centre and Broomfield Hospital (Essex County Council AS-1071)
- No designated heritage assets within the site, although it is within the immediate setting of listed buildings. Supports the HIA and identified suitable mitigation measures included within the policy and supporting text (Historic England AS-1002)
- Supports policy requirement for suitable flood risk management and SuDS, and network of multifunctional green infrastructure and would welcome reference to Anglian Water's Surface Water Risk Management Guidance in the reasoned justification (Anglian Water Services Ltd AS-1091)
- Whilst sufficient dry weather flow capacity exists at Chelmsford WRC, developers to engage early with Anglian Water to assess a sustainable connection into the network (Anglian Water Services Ltd AS-1091)
- Site lies within the zone of influence of the Essex Coast RAMS and should include policy requirements to secure RAMS tariff payments (Natural England AS-1110)
- CCC has not taken into account the adopted Broomfield NP and has not consulted appropriately with Broomfield Parish Council when considering Site 19 (Broomfield Parish Council AS-71, Brumfelda - Broomfield's Local History Group AS-712)
- Objects to the site as it is unsuitable and lacks infrastructure capacity. The site must be removed from the Local Plan (Broomfield Parish Council AS-71)
- Objects to the inclusion of the site as it is a part of the buffer zone locally known as the Felsted Field Gap, which is important to prevent coalescence with Chelmsford (Broomfield Parish Council AS-71)
- Despite previously being identified as inappropriate by CCC has now been included in the Local Plan with no consideration to the existing issues with traffic, access, and lack of schools (Broomfield Parish Council AS-71)
- Concerns on local traffic issues both before, during and after construction. This should be considered alongside with the proposed Norwich to Tilbury pylon work that will also affect this area during construction (Broomfield Parish Council AS-71)
- The development would result in loss of Grade 2 agricultural land (Brumfelda - Broomfield's Local History Group AS-712)
- Site could be made sound by addressing key landscape, traffic, and heritage concerns. Broomfield NP sustainable transport proposals could help mitigate impacts (Brumfelda - Broomfield's Local History Group AS-712)
- Existing infrastructure, including transport, education, healthcare, sewerage, water supply, flood prevention, shops, employment opportunities, and other facilities, cannot support the proposed scale of this development, individually or cumulatively alongside other proposed developments
- Concern that previous development has not been supported by appropriate infrastructure and uncertainty about future funding and delivery
- Engage with Essex County Council, NHS Mid & South Essex, and Anglian Water to secure infrastructure commitments before allocating this site

- Concerns over road safety on Patching Hall Lane and School Lane, requesting mitigation including traffic calming, a 20mph speed limit, pedestrian crossings, footpaths and cycle lanes, and consideration of a new western access into Hollow Lane with access onto Chignal Road
- Concerns over accuracy of traffic modelling. The trip rates used are more appropriate for sites with very good public transport and active travel links, which invalidates the traffic modelling used
- The junction modelling appraisal (T007) does not address wider highway network inadequacies, including reduced two-way link capacity in Patching Hall between Broomfield Road and Sunrise Avenue due to on-street parking
- The transport modelling forecasts overcapacity in the key junctions including Patching Hall Lane/B1008 and School Lane/B1008 by 2041. Given current road layouts and funding uncertainties there is limited scope for effective mitigation particularly in relation to congestion and safety risks
- Concerns that appropriate traffic modelling during peak hours and school times have not been carried out sufficiently
- Site is unsustainable with limited public transport so it will encourage car dependency
- Rural landscapes and habitats that fall outside Green Belt and other designations have been consistently undervalued
- Site currently helps prevent urban sprawl and coalescence, including between Broomfield and neighbouring settlements. It should be protected by designating as Green Wedge
- Concern that development would result in the irreversible loss of trees and habitats, and reduction of biodiversity. A full ecological survey to identify the species at risk and mitigate loss should be carried out
- Concern that the required BNG cannot be achieved
- Development would significantly diminish the amenity value and character the area, vital for leisure, wellbeing, and social interaction
- Plan fails sequential test for flood risk as parts of the site lie within Flood Zones 2 and 3
- Given the clay soils in the area, below-ground soakaways are unlikely to work and surface water would need to be managed through ponds, underground storage tanks or swales and ditches, either on or off site
- Concerns that the development will exacerbate existing water, sewage, flooding, and drainage issues
- Development would result in increased air, light, and noise pollution, especially during construction
- Scale, design and density of the proposal is disproportionate to the character and capacity of the surrounding area, resulting in harm to the character of the local streetscape, loss of open views and the significance and setting of nearby heritage assets
- The proposed buffers and landscaping are insufficient to preserve the area's historic and visual qualities
- The two closest schools, Newlands Spring and Broomfield Primary schools, have no capacity and lack the land required for expansion

- Substantial consideration should be given to protecting the privacy and amenity of existing residents, including avoiding overlooking, maintaining adequate boundary separation/ open space buffer and minimising disturbance
- Housing growth could be more appropriately directed to better-served areas around Chelmsford, including Baddow, Galleywood and Sandon
- Focus instead on building out existing planning permissions and lobby government to re-instate the A12 widening project
- Consider new strategic sites that can accommodate communities, housing, employment and new infrastructure
- Requests to reduce the site area, reduce the number of homes to less than 100 and to remove site from the Plan
- Access the site via Chignal Road and Little Hollows rather than Patching Hall Lane
- Objects to the proposal as it breaches Article 8 protections afforded to residents.

CCC Response
The Council has tested the site through its Additional Sites – Housing Site Studies October 2025 (PL018) and the wider Local Plan policy requirements for landscaping, environmental improvements and heritage protection can be met within the proposed site boundary.
The policy is flexible to address sport, leisure and recreation needs which may be provided on-site, and/or off-site via financial contributions, depending on scale and need. Strategic Policy S10 of the Pre-Submission Local Plan and the latest Planning Obligations SPD set this out in more detail and the precise needs can be considered through the masterplan and planning application process.
Reference to opportunities set out in the LNRS to connect and contribute to wider Green Infrastructure network is covered by Strategic Policy S4, Strategic Policy S9, and Policy DM16 of the Pre-Submission Plan in relation to the LNRS; and also DM16 in relation to the Essex Green Infrastructure Strategy. There is no need to propose modifications to the Plan.
Minor modification will be proposed to remove the need for a MRA to be undertaken.
The height, scale and design of the development will be considered in detail as part of the future masterplan and planning application for the site.
Relevant sustainable and active travel enhancements will be considered as part of the masterplan and planning application for the site, informed by further supporting information such a full detailed Traffic Assessment of the site and the Broomfield Neighbourhood Plan.
To avoid duplication in the Plan, rather than modifying all site policies, a minor modification will be proposed to the reasoned justification of Policy DM18 to include reference to Anglian Water's Surface Water Risk Management Guidance.
Reference to RAMS was removed from each qualifying allocation in the Plan Review to avoid repetition. Explanatory text is set out in policies S4 and DM16. Natural England agreed this in a signed SOCG dated December 2024, and have reaffirmed this position.
Broomfield Parish Council have been consulted at each and every Local Plan consultation stage.

The Council's Infrastructure Delivery Plan (IDP) sits alongside the Local Plan. This assesses the current status of infrastructure across Chelmsford and identifies what new infrastructure investment is required to support the Local Plan growth, when it is needed, and funding sources.
Site allocations are strategic matters for the Local Plan, but where applicable the made Neighbourhood Plans include detailed design and other guidance which can influence future detailed development proposals and planning applications.
The evidence base including traffic modelling, heritage assessment, and landscape capacity and sensitivity assessment show that there are no overriding constraints that would hinder the delivery of the site, which will contribute to housing supply in the first five years of the plan adoption.
The Council commissioned Essex Highways to review and consider the key issues raised in the highway and transportation responses received to the consultation. This is given in Appendix 2 and includes a review of representations received from members of the public. Essex Highways response has been used by CCC to understand and respond to matters of concern raised in this You Said We Did report and to inform any proposed minor modifications to the Local Plan.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
Any impact on amenities from construction activity is a relative short term impact which can be managed by appropriate planning conditions as part of any future planning application.
To meet our development needs it is inevitable that some agricultural land will be used for development.
The Green Wedge designation follows the valleys of the River Wid, River Can and River Chelmer. The purpose of the Green Wedge is to maintain and protect the open character of the landscape of the river valleys, to provide physical links between the urban area of Chelmsford and the countryside beyond, to provide an important network of natural habitats and various formal and informal leisure and recreation uses. It relates to land within the river valleys and does not extend to other parcels of land so it would not be appropriate to consider extending the designation to this location.
The site will be required to comply with wider Local Plan policy requirements, including the need to protect existing trees, improve biodiversity and green infrastructure as set out in policies DM16 and DM17.
The site allocation is supported by the plan evidence base including Sequential and Exception Test, Water Cycle Studies.
The suite of policies in the Plan seek to protect the character of landscapes and ensure suitable drainage and SuDS support development.
The Additional Sites - Landscape Sensitivity and Capacity Study October 2025 (PL013), Additional Sites - Heritage Assessments Technical Note October 2025 (PL014), and Additional Sites - Archaeological Impact Assessment October 2025 (PL015) have informed the site requirements for landscape, heritage and archaeology. The full details of these will be considered as part of the future masterplan and planning application for the site in accordance with wider Local Plan policies DM13, DM14 and DM15.
Based on the Additional Sites - Chelmsford City Council Housing Scenario Test - Primary and Secondary Education (INF008) ECC, as education provider, are content that sufficient capacity can be made to accommodate the site.

Other proposed development sites are dealt with in the consideration of Strategic Policy S7 and addressed by the Pre-Submission Integrated Impact Assessment and the Integrated Impact Assessment Focused Additional Sites Addendum.
Objections relating to the breach of Article 8 protections are not supported with evidence to demonstrate a disproportionate or exceptional interference with private or family life that would warrant overriding the public interest in a site allocation for housing. Concerns raised relate to planning matters, which can and should be addressed through the planning application process.

Location 7 – Great Leighs

Strategic Growth Site Policy 7b – Great Leighs – Land East of London Road

Key statistics:

Consultation point	**Total number of responses**
Strategic Growth Site Policy 7b – Great Leighs – Land East of London Road	11

Summary of Representations – main issues and requested changes:

- Supports allocation, including that development should accord with a masterplan approved by CCC. This should consider connectivity to Chelmer Valley Park and Ride (Essex County Council AS-1074, AS-1075)
- Supports inclusion of affordable housing for older people and reasoned justification should reference the ECC Extra Care Design Guide and dementia-inclusive design principles (Essex County Council AS-1074)
- Supports requirement to make a financial contribution to the delivery of the Chelmsford North East Bypass (Essex County Council AS-1073)
- Supports requirement to undertake a MRA (Essex County Council AS-1073)
- Council's previous HIA found no notable heritage impacts, and the proposed change to the nature of the allocation would not result in additional heritage impacts (Historic England AS-1003)
- Site lies within the zone of influence of the Essex Coast RAMS and should include policy requirements to secure RAMS tariff payments (Natural England AS-1111)
- Supports the policy requirement to protect and enhance the River Ter SSSI to the south ensuring new development provides any required mitigation measures (Natural England AS-1111)
- Supports the site specific policy wording regarding WWTW capacity (Environment Agency AS-729)
- Supports policy requirement for suitable flood risk management and SuDS, and network of multifunctional green infrastructure and would welcome reference to Anglian Water's Surface Water Risk Management Guidance in the reasoned justification (Anglian Water Services Ltd AS-1092)
- Supports the requirements to demonstrate sufficient wastewater treatment and disposal, and 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 future investment plans (Anglian Water Services Ltd AS-1092)
- Protect Bridleway 13 by upgrading Footpaths 14 and 16 to multi-user routes (Essex Bridleways Association AS-61)
- Reference to maximising connectivity with the wider GI network should be included in the policy requirements (Essex County Council AS-1074)
- Commitment to collaborate with Braintree District Council and ECC regarding the impact of Plan growth on secondary education should be included in the reasoned justification (Essex County Council AS-1073)
- Infrastructure will require improvement, including public transport, education, healthcare and sewerage alongside or prior to development (Great and Little Leighs Parish Council AS-439)
- Further evidence is required to demonstrate that site can deliver the additional 140 dwellings (Bloor Homes AS-473)
- Concerns about increased housing density and impacts on the rural character and neighbouring properties. Mitigation including a substantial green buffer and single-storey development adjacent to existing dwellings should be required.

CCC Response
The Local Plan should be read as a whole, and other policies will ensure there will be sufficient waste water capacity to serve the development. For example, 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 or that such capacity can be delivered by the proposal.
Reference to RAMS was removed from each qualifying allocation in the Plan Review to avoid repetition. Explanatory text is set out in policies S4 and DM16. Natural England agreed this in a signed SOCG dated December 2024, and have reaffirmed this position.
Strategic Policy S14 includes reference to dementia friendly, inclusive and accessible development. Design requirements for older people and age-friendly places are also addressed in the Planning Obligations SPD (INF011, January 2026). The Plan should be read as a whole so no need to duplicate in site policy.
A minor amendment is proposed detailing the collaboration with Braintree Council to facilitate educational requirements that may arise from this development.
The site policy requires financial contributions to services and facilities including education and healthcare provision, and to provide appropriate improvements, as necessary to the local and strategic road network.
The Council's Infrastructure Delivery Plan (IDP) sits alongside the Local Plan. This assesses the current status of infrastructure across Chelmsford and identifies what new infrastructure investment is required to support the Local Plan growth, when it is needed, and funding sources.
The site allocation is considered a sustainable and deliverable locations for development and consistent with the plan priorities and other policies including the Spatial Strategy.

The use of the ‘around’ housing figure would allow for a higher density development to be brought forward where this addresses site constraints and conforms with other policies in the plan as a whole.
A modification is proposed to ensure that future capacity of wastewater treatment facilities in Great Leighs is subject to the necessary environmental permits.
Reference to opportunities set out in the LNRS is covered by Strategic Policy S4, Strategic Policy S9, and Policy DM16 of the Pre-Submission Plan; and also DM16 in relation to the Essex Green Infrastructure Strategy. The amendments requested are considered too detailed for this plan.

Location 9 – Boreham

Strategic Growth Site Policy 9a – Waltham Road Employment Area, Boreham

Key statistics:

Consultation point	**Total number of responses**
Strategic Growth Site Policy 9a – Waltham Road Employment Area, Boreham	30

Summary of Representations – main issues and requested changes:

- Supports the requirement for development to accord with a masterplan approved by CCC (Essex County Council AS-1076)
- Supports requirement to undertake a Mineral Infrastructure Impact Assessment and Waste Infrastructure Impact Assessment, given location within the Mineral and Waste Consultation Areas for Bulls Lodge Quarry (Essex County Council AS-1076)
- Supports increased size of allocation, expanded use classes and seeks greater policy flexibility on access arrangements (LVJ Maldon Ltd AS-486)
- Whilst sufficient dry weather flow capacity exists at Chelmsford WRC, developers to engage early with Anglian Water to assess a sustainable connection into the network (Anglian Water Services Ltd AS-1093)
- Engagement required with the Essex Roads Policing Team at the pre-planning stage (Essex Police AS-990)
- Site lies within the East 2 WAM Network statutory safeguarding zone where any development or change of use will trigger a Ministry of Defence statutory consultation requirement. Policy wording is required to ensure that development does not impact defence operations or assets (Defence Infrastructure Organisation AS-1047)
- Lack of robust evidence on the need for the scale of employment land proposed in Boreham (Boreham Parish Council AS-977)
- Proposed mitigation (e.g. landscape buffers) fails to properly address adverse impacts on neighbouring residential amenity
- Policy requirements should include extensive landscaping and tree planting, limits on building height, size, footprint and siting, controls on materials,

lighting, hours of operation and vehicle movements, and delivery of a footpath/cycleway link prior to development (Mrs Mary Rance AS-665)
- There should be restrictions on types of use, size, height and scale and limit hours of operation, to reduce heavy goods vehicle movements
- Existing infrastructure, including transport, education, healthcare, sewerage, water supply, shops, employment opportunities, telecommunication, utilities, and other facilities cannot support the proposed scale of development, individually or cumulatively alongside other proposed development in the area
- Concerns regarding traffic, transport connectivity and potential strain on the local highway network (Little Baddow Parish Council AS-332, Boreham Parish Council AS-977, Boreham Conservation Society AS-1022)
- Development would lead to landscape, heritage, environmental (including light, noise and smoke) and biodiversity harm and encroachment into the countryside (Boreham Parish Council AS-977, Boreham Conservation Society AS-1022)
- Concerns over the size, nature and layout (Boreham Conservation Society AS-1022)
- Boreham NP in late stages of development and contains no allocations consistent with current adopted Chelmsford Local Plan (Boreham Parish Council AS-977).

CCC Response
Minor modifications will be proposed to ensure the development is designed in such a way that there is no impact on the operational or capability of nearby defence assets.
The Council commissioned Essex Highways to review and consider the key issues raised in the highway and transportation responses received to the consultation. This is given in Appendix 2 and includes a review of representations received from members of the public and Boreham Conservation Society. Essex Highways response has been used by CCC to understand and respond to matters of concern raised in this You Said We Did report and to inform any proposed minor modifications to the Local Plan.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
The site policy requires safe and convenient pedestrian and cycle links.
The need for the scale of employment is covered in response to Strategic Policy S6.
The development will be expected to promote the highest standards of design to minimise its impact on the landscape and amenity of nearby residential properties. There must be no large-scale buildings near the northern boundary. Trees are to be retained and there needs to be new landscaping along the northern and western boundaries.
The development will be expected to provide suitable measures to ensure that the amenity of nearby residents is not adversely affected such as noise attenuation measures and boundary screening.
The type of uses is restricted to those listed in the policy. The size, height and scale of buildings, and hours of operation will be considered as part of any future planning application and can be managed by appropriate planning conditions if necessary.

The Council's Infrastructure Delivery Plan (IDP) sits alongside the Local Plan. This assesses the current status of infrastructure across Chelmsford and identifies what new infrastructure investment is required to support the Local Plan growth, when it is needed, and funding sources.
The site allocation is supported by the plan evidence base including Water Cycle Studies, Heritage Impact Assessment, Landscape Sensitivity and Capacity Study, Air Quality Assessment and traffic modelling.
Site allocations are strategic matters for the Local Plan, but where applicable the made Neighbourhood Plans include detailed design and other guidance which can influence future detailed development proposals and planning applications.

Growth Site Policy 9b – Land to the East of 118 to 124 Plantation Road, Boreham

Key statistics:

Consultation point	**Total number of responses**
Growth Site Policy 9b – Land to the East of 118 to 124 Plantation Road, Boreham	22

Summary of Representations – main issues and requested changes:

- Supports allocation. Reasoned justification to clarify housing is for older persons consistent with policy and should reference the ECC Extra Care Design Guide and dementia-inclusive design principles (Essex County Council AS-1077)
- Supports the HIA and identified suitable mitigation measures. Supports the inclusion of these as criteria within the policy and supporting text (Historic England AS-1005)
- Supports policy requirement for suitable flood risk management and SuDS, and network of multifunctional green infrastructure and would welcome reference to Anglian Water's Surface Water Risk Management Guidance in the reasoned justification (Anglian Water Services Ltd AS-1094)
- Rising main (pressurised sewer) within the site. Requirement to protect existing sewers and their easements should be included (Anglian Water Services Ltd AS-1094)
- Whilst sufficient dry weather flow capacity exists at Chelmsford WRC, developers to engage early with Anglian Water to assess a sustainable connection into the network (Anglian Water Services Ltd AS-1094)
- Site lies within the zone of influence of the Essex Coast RAMS and should include policy requirements to secure RAMS tariff payments (Natural England AS-1112)
- Design and ongoing management of site should aim to protect and enhance habitat features for invertebrates reflecting its position adjacent to an Important Invertebrate Area. Reference should be made to BugLife guidance in policy or supporting text and/or within Policy EN3 (Natural England AS-1112)
- Supportive of the principle of the site allocation, although requests a number of specific changes to the policy. These include clarifying the precise type of

development, requiring cooperation between adjacent allocations, referencing the foul sewer as a constraint, refining infrastructure contribution wording and amendment to the site boundary to include land needed for pedestrian/cycle connectivity (Urban Provincial AS-11)

- Clarification required given that site map refers to land east of 102a to 124 Plantation Road and the site description as land to east of 118 to 124 Plantation Road (Boreham Parish Council AS-978)
- Unsustainable location with distance to amenities likely to encourage more car use and bus service very limited. Improved footpaths required (Boreham Parish Council AS-978, Boreham Conservation Society AS-1023)
- Concerns that the existing highway network will not be able to accommodate additional traffic, and this will negatively impact local residents (Little Baddow Parish Council AS-334, Boreham Parish Council AS-978, Boreham Conservation Society AS-1023)
- Concerns over the safety and feasibility of site access. Consider the potential to unify access to sites 9b and 9c (Boreham Parish Council AS-978, Boreham Conservation Society AS-1023)
- Existing infrastructure, including transport, education, healthcare, sewerage, water supply, shops, employment opportunities, telecommunication, utilities, and other facilities cannot support the proposed scale of this development, individually or cumulatively alongside other proposed developments in the local area (Boreham Parish Council AS-978, Boreham Conservation Society AS-1023)
- Unclear how dwellings can be reserved for older people in the long term (Boreham Parish Council AS-978)
- Development should include open space and respect rural nature of historic footpath at eastern edge of site (Boreham Conservation Society AS-1023)
- Concern over the size, nature and layout of development and damage to local heritage assets
- Boreham NP in late stages of development and contains no allocations consistent with current adopted Chelmsford Local Plan (Boreham Parish Council AS-978).

CCC Response
Strategic Policy S14 includes reference to dementia friendly, inclusive and accessible development. Design requirements for older people and age-friendly places are also addressed in the Planning Obligations SPD (INF011, January 2026). The Plan should be read as a whole so no need to duplicate in site policy.
To avoid duplication in the Plan, rather than modifying all site policies, a modification is proposed to the reasoned justification of Policy DM18 to include reference to Anglian Water's Surface Water Risk Management Guidance.
Minor modification will be proposed to ensure the layout safeguards suitable access for the maintenance of sewerage infrastructure.
Reference to RAMS was removed from each qualifying allocation in the Plan Review to avoid repetition. Explanatory text is set out in policies S4 and DM16. Natural England agreed this in a signed SOCG dated December 2024, and have reaffirmed this position.
Strategic Policy S9 and S10 of the Pre-Submission Local Plan and the latest Planning Obligations SPD set this out infrastructure requirements in more detail

and how they will be secured. The precise needs can be considered through the masterplan and planning application process.
There is no need to include additional land within the site boundary for pedestrian/cycle connectivity as this land is within the revised DSB for Boreham so could be included as part of any planning application if required.
Policy S4 and DM16 already provide adequate protection and enhancement for ecology, species, habitat, nature and biodiversity designated sites from development proposals (both statutory and non-statutory, including priority habitats and species) of international, national and local importance, to incorporate measures and features into the design of new buildings, extensions or renovations to increase biodiversity, and to avoid negative impacts on biodiversity and geodiversity, adequately mitigate unavoidable impacts and as a last resort compensate for residual impacts. This will allow specific site considerations to be addressed at masterplan and planning application stage. It is not considered necessary to specifically refer to BugLife in the plan and the profiles are still being 'developed'.
The boundary of the site is as set out in the Additional Sites Map.
The Council commissioned Essex Highways to review and consider the key issues raised in the highway and transportation responses received to the consultation. This is given in Appendix 2 and includes a review of representations received from members of the public and Boreham Conservation Society. Essex Highways response has been used by CCC to understand and respond to matters of concern raised in this You Said We Did report and to inform any proposed minor modifications to the Local Plan.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
Relevant sustainable and active travel enhancements will be considered as part of the masterplan and planning application for the site, informed by further supporting information such a full detailed Traffic Assessment of the site.
The Council's Infrastructure Delivery Plan (IDP) sits alongside the Local Plan. This assesses the current status of infrastructure across Chelmsford and identifies what new infrastructure investment is required to support the Local Plan growth, when it is needed, and funding sources.
The site is below the thresholds to provide open space on site as set out in Appendix B of the Pre-Submission Local Plan.
The Section 106 agreement at the planning application stage can secure the housing tenure for perpetuity.
The Additional Sites heritage assessment sets out that there are no overriding constraints that would prevent the site from coming forward. The policy includes necessary requirements to ensure relevant heritage assets are appropriately protected.
Site allocations are strategic matters for the Local Plan, but where applicable the made Neighbourhood Plans include detailed design and other guidance which can influence future detailed development proposals and planning applications.

Growth Site Policy 9c – South of Main Road and Dukes Wood Close, Boreham

Key statistics:

Consultation point	Total number of responses
Growth Site Policy 9c – South of Main Road and Dukes Wood Close, Boreham	22

Summary of Representations – main issues and requested changes:

- Supports allocation. Reasoned justification to clarify that any proposed extra care schemes should reference the ECC Extra Care Design Guide and dementia-inclusive design principles at masterplanning and application stage (Essex County Council AS-1078)
- Supports requirement to undertake a Mineral Infrastructure Impact Assessment and Waste Infrastructure Impact Assessment, given location within the Mineral and Waste Consultation Areas for Boreham Metal Recycling/ Bulls Lodge Quarry (Essex County Council AS-1078, AS-1080)
- Supports policy requirement for suitable flood risk management and SuDS, and network of multifunctional green infrastructure and would welcome reference to Anglian Water's Surface Water Risk Management Guidance in the reasoned justification (Anglian Water Services Ltd AS-1095)
- Rising main (pressurised sewer) within the site. Requirement to protect existing sewers and their easements should be included (Anglian Water Services Ltd AS-1095)
- Whilst sufficient dry weather flow capacity exists at Chelmsford WRC, developers to engage early with Anglian Water to assess a sustainable connection into the network (Anglian Water Services Ltd AS-1095)
- Site lies within the zone of influence of the Essex Coast RAMS and should include policy requirements to secure RAMS tariff payments (Natural England AS-1113)
- Design and ongoing management of site should aim to protect and enhance habitat features for invertebrates reflecting its position adjacent to an Important Invertebrate Area. Reference should be made to BugLife guidance in policy or supporting text and/or within Policy EN3 (Natural England AS-1113)
- Supports allocation and flexibility afforded to number of units. Important that Plan retains flexibility should market or viability conditions change (CHP AS-947)
- Requirements for Mineral Infrastructure Impact Assessment and Archaeological Assessment unjustified and should be removed (CHP AS-947)
- Supports the HIA and identified suitable mitigation measures. Supports the inclusion of these as criteria within the policy and supporting text (Historic England AS-1006)
- Unsustainable location with distance to amenities likely to encourage more car use and bus service very limited. Improved footpaths required (Boreham Parish Council AS-980, Boreham Conservation Society AS-1024)

- Concerns that the existing highway network will not be able to accommodate additional traffic, and this will negatively impact local residents (Little Baddow Parish Council AS-335)
- Concerns over the safety and feasibility of site access. Consider the potential to unify access to sites 9b and 9c (Boreham Parish Council AS-980, Boreham Conservation Society AS-1024)
- Existing infrastructure, including transport, education, healthcare, sewerage, water supply, shops, employment opportunities, telecommunication, utilities, and other facilities, cannot support the proposed scale of this development, individually or cumulatively alongside other proposed developments (Boreham Parish Council AS-980, Boreham Conservation Society AS-1024)
- Unclear how dwellings can be reserved for older people in the long term (Boreham Parish Council AS-980, Boreham Conservation Society AS-1024)
- Development should include open space (Boreham Conservation Society AS-1024)
- Concerns over detrimental impact on adjacent footpath and Conservation Area (Boreham Parish Council AS-980, Boreham Conservation Society AS-1024)
- Boreham NP in late stages of development and contains no allocations consistent with current adopted Chelmsford Local Plan (Boreham Parish Council AS-980).

CCC Response
Strategic Policy S14 includes reference to dementia friendly, inclusive and accessible development. Design requirements for older people and age-friendly places are also addressed in the Planning Obligations SPD (INF011, January 2026). The Plan should be read as a whole so no need to duplicate in site policy.
To avoid duplication in the Plan, rather than modifying all site policies, a modification is proposed to the reasoned justification of Policy DM18 to include reference to Anglian Water's Surface Water Risk Management Guidance.
Minor modification will be proposed to ensure the layout safeguards suitable access for the maintenance of sewerage infrastructure.
Reference to RAMS was removed from each qualifying allocation in the Plan Review to avoid repetition. Explanatory text is set out in policies S4 and DM16. Natural England agreed this in a signed SOCG dated December 2024, and have reaffirmed this position.
Policy S4 and DM16 already provide adequate protection and enhancement for ecology, species, habitat, nature and biodiversity designated sites from development proposals (both statutory and non-statutory, including priority habitats and species) of international, national and local importance, to incorporate measures and features into the design of new buildings, extensions or renovations to increase biodiversity, and to avoid negative impacts on biodiversity and geodiversity, adequately mitigate unavoidable impacts and as a last resort compensate for residual impacts. This will allow specific site considerations to be addressed at masterplan and planning application stage. It is not considered necessary to specifically refer to BugLife in the plan and the profiles are still being 'developed'.
Mineral Infrastructure Impact Assessment is required given the sites location within the Mineral Consultation Areas for Bulls Lodge Quarry.

Given the sites location it may contain archaeological deposits which will need to be considered by future development proposals, an archaeological assessment is therefore required.
The Council commissioned Essex Highways to review and consider the key issues raised in the highway and transportation responses received to the consultation. This is given in Appendix 2 and includes a review of representations received from members of the public and Boreham Conservation Society. Essex Highways response has been used by CCC to understand and respond to matters of concern raised in this You Said We Did report and to inform any proposed minor modifications to the Local Plan.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
Relevant sustainable and active travel enhancements, including providing safe and convenient pedestrian and cycle connections, will be considered as part of the masterplan and planning application for the site, informed by further supporting information such a full detailed Traffic Assessment of the site.
The Council's Infrastructure Delivery Plan (IDP) sits alongside the Local Plan. This assesses the current status of infrastructure across Chelmsford and identifies what new infrastructure investment is required to support the Local Plan growth, when it is needed, and funding sources.
The site is below the thresholds to provide open space on site as set out in Appendix B of the Pre-Submission Local Plan.
The Section 106 agreement at the planning application stage can secure the housing tenure for perpetuity.
The Additional Sites heritage assessment sets out that there are no overriding constraints that would prevent the site from coming forward. The policy includes necessary requirements to ensure relevant heritage assets are appropriately protected.
Site allocations are strategic matters for the Local Plan, but where applicable the made Neighbourhood Plans include detailed design and other guidance which can influence future detailed development proposals and planning applications.

Location 14 – Ford End

Growth Site Policy 14b – Land South of Ford End Primary School

Key statistics:

Consultation point	**Total number of responses**
Growth Site Policy 14b – Land South of Ford End Primary School	15

Summary of Representations – main issues and requested changes:

- Supports policy (including increased dwelling capacity), confirms the site is available, suitable, deliverable within five years (Dandara AS-1139)

- Supports the HIA and identified suitable mitigation measures. Supports the inclusion of these as criteria within the policy and supporting text (Historic England AS-1007)
- Supports the requirement for development to accord with a masterplan approved by CCC. This should include more detail of the character of the required defensible landscape buffer (Essex County Council AS-1081)
- Reasoned justification should refer to 'The EPOA Parking Guidance for Schools…' and the School Design Guidance (Essex County Council AS-1081)
- Supports provision of an off-road parking area for use by staff of Ford End Primary School and the creation of car-free public spaces around schools (Essex County Council AS-1081)
- Supports the site specific policy wording regarding WWTW capacity (Environment Agency AS-730)
- Supports policy requirement for suitable flood risk management and SuDS, and network of multifunctional green infrastructure and reference to Anglian Water's Surface Water Risk Management Guidance in the reasoned justification (Anglian Water Services Ltd AS-1096)
- Supports the requirements to demonstrate sufficient wastewater treatment and disposal, and 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 (Anglian Water Services Ltd AS-1096)
- Site lies within the zone of influence of the Essex Coast RAMS and should include policy requirements to secure RAMS tariff payments (Natural England AS-1114)
- New off-road parking area for staff of Ford End Primary School should be well managed to prevent crime and anti-social behaviour (Essex Police DOCO AS-987)
- Supports the site and an increase above the original 20 dwellings but considers 75 excessive. Seeks clearer commitment on affordable housing levels, raises concerns about increased hydrological and drainage impacts, and expects any development to deliver community benefits, including a speed camera scheme and wider traffic management measures (Great Waltham Parish Council AS-79)
- Requests clarification and flexibility in the policy wording on the proposed village hall - amending the requirement to provide it "if/as required" to align with supporting text (Dandara AS-1139)
- A new village hall has been proposed as part of the development. Reflecting that the existing village hall is a community asset, trustees are seeking views from the community before any position is taken (Ford End Village Hall AS-498)
- Key factors must be addressed in relation to Ford End Primary School prior to commencement of any development, including safeguarding and site security, traffic and construction logistics, access and parking arrangements and noise management. Any increase in intake of pupils would require the provision of in-housing kitchen facilities and expanded dining space (Ford End Primary School AS-475)
- The proposed number of houses is considered too high (Ford End Village Hall AS-498)

- Concern over loss of both high grade agricultural land and biodiversity
- Concern over lack of amenities in the village and capacity at the school
- Improvements to infrastructure required, including effective traffic calming and safe pedestrian crossings across the B1008
- Significant amount of development within a limited radius of Ford End with lack of investment in infrastructure.

CCC Response
Reasoned Justification proposed to be modified to include reference to Essex Part 1 Parking Guidance.
The Council commissioned Essex Highways to review and consider the key issues raised in the highway and transportation responses received to the consultation. This is given in Appendix 2 and includes a review of representations received from members of the public. Essex Highways response has been used by CCC to understand and respond to matters of concern raised in this You Said We Did report and to inform any proposed minor modifications to the Local Plan.
The need for development to be delivered in line with available WRC capacity is noted, there is no need to propose any modifications to the Local Plan in relation to this.
Reference to RAMS was removed from each qualifying allocation in the Plan Review to avoid repetition. Explanatory text is set out in policies S4 and DM16. Natural England agreed this in a signed SOCG dated December 2024, and have reaffirmed this position.
The need for the new off-road parking area for staff of Ford End Primary School to be well managed to prevent crime and anti-social behaviour is noted and will be considered as part of the masterplanning considerations for the site. There is no need to propose any modifications to the Local Plan in relation to this.
The evidence base for the Local Plan supports the expansion of the site.
The detail of community benefits, including traffic calming measures, will be considered as part of the planning brief and planning application for the site, informed by further supporting information such a full detailed Traffic Assessment of the site.
Affordable housing requirements for the site is set out Policy DM1 which will be required to be met as part of any future planning application for the site.
The difference between the policy and text included in the reasoned justification is recognised. The reasoned justification is intended to explain that a new village hall can be provided on-site, in the form of a new hall, or off-site by renovation and improvement of the existing hall in the Village. This will be considered as part of the design brief and planning application for the site.
The Additional Sites - Chelmsford City Council Housing Scenario Test - Primary and Secondary Education (INF008) identifies sufficient place capacity at the Primary School. It is noted that to facilitate those places upgrades to the School's facilities may be required. This will be considered in consultation with the School as part of the Planning Brief and planning application for the site.
To meet our development needs it is inevitable that some agricultural land will be used for development.
The Council's Infrastructure Delivery Plan (IDP) sits alongside the Local Plan. This assesses the current status of infrastructure across Chelmsford and identifies what

new infrastructure investment is required to support the Local Plan growth, when it is needed, and funding sources.

Location 11 – Bicknacre

Strategic Growth Site Policy 11c – Land West of Barbrook Way, Bicknacre

Key statistics:

Consultation point	**Total number of responses**
Strategic Growth Site Policy 11c – Land West of Barbrook Way, Bicknacre	243

Summary of Representations – main issues and requested changes:

- Supportive of the enlargement of the allocation. Broadly supportive of policy wording although requested changes include, removal of requirement for a separate masterplan outside the Development Management process (reflecting site is already subject to a planning application) and clarification of policy approach to securing contributions towards mitigating recreational pressure on Thrift Wood SSSI (Welbeck Strategic Land V Limited AS-491)
- No impact on the settings of nearby historic assets (Historic England AS-1008)
- Site includes a small portion of Flood Zone 3 within the northern boundary adjacent to Priory Road. Recommends that Barbrook Way is used as the main vehicular access and Priory Road is a secondary access and this should be reflected in the policy (Environment Agency AS-732)
- Supports policy requirement for suitable flood risk management and SuDS, and network of multifunctional green infrastructure and would welcome reference to Anglian Water's Surface Water Risk Management Guidance in the reasoned justification (Anglian Water Services Ltd AS-1097)
- Existing surface water sewer within the site and possible discharge point. Requirement to protect existing sewer and discharge point and their easements should be included (Anglian Water Services Ltd AS-1097)
- Whilst sufficient dry weather flow capacity exists at Chelmsford WRC, developers to engage early with Anglian Water to assess a sustainable connection into the network (Anglian Water Services Ltd AS-1097)
- Site lies within the zone of influence of the Essex Coast RAMS and should include policy requirements to secure RAMS tariff payments (Natural England AS-1115)
- Welcomes the policy requirement to assess, and where appropriate mitigate, the potential cumulative effect on the designated features of Thrift Wood SSSI. However, the cumulative effects of recreational pressure on other nearby SSSIs and local wildlife sites must be addressed in liaison with the relevant site managers. Policy should be strengthened to require appropriate mitigation strategies to be developed in liaison with site managers to ensure

the protection and enhancement of these designated sites and supporting habitats (Natural England AS-1115)

- Site could indirectly impact the SSSIs across Danbury Ridge through cumulative recreational pressure without appropriate mitigation measures. Recommend adding Policy requirements relating to the Danbury SSSIs and for consistency with Strategic Growth Site Policy 13 - Danbury (National Trust AS-31)
- Plan does not adequately justify the allocation of this greenfield site when CCC maintains a Brownfield Land Register. The Additional Sites document includes only one brownfield site and does not explain why available sustainable brownfield opportunities have not been prioritised (Woodham Ferrers & Bicknacre Parish Council AS-193)
- Objects to the substantial increase from approximately 20 dwellings in the previous pre-submission plan to 250 dwellings, without any clear or proportionate explanation (Woodham Ferrers & Bicknacre Parish Council AS-193)
- Site is undeliverable within the Plan period due to unresolved access constraints. Until ownership and access rights are resolved, development cannot be considered deliverable (Woodham Ferrers & Bicknacre Parish Council AS-193)
- Retain Bridleway 2 and improve connectivity between Bridleways 28 and 3 (Essex Bridleways Association AS-62)
- Site is not suitable for housing development as there is limited public transport and lack of local employment opportunities
- Shifting housing supply to small rural village is neither strategic nor sustainable
- Object to the site due to the adverse impact on wildlife and habitat, greenspace, trees (including TPO Root Protection Areas) and hedgerows, wastewater capacity and the loss of high grade agricultural land
- Concern about the speed, scale and cumulative impact of development, including reflecting housing growth already delivered in Bicknacre
- Doubts about the level of demand for housing and concerns that development would potentially increase house prices
- Concerns about road safety, including pedestrian routes limited by narrow pavements and numbers of HGVs during construction
- Concerns about traffic, congestion and road capacity (including Barbrook Way, Priory Road, A12 section between J18 and J19, B1418, East Hanningfield Road), lack of parking and lack of appropriate maintenance currently by the Council
- Concerns as to whether safe and suitable access to the site can be achieved, including for service vehicles
- Access should only be provided from Priory Road
- Increased risk of flooding and surface water due to insufficient drainage capacity with Anglian Water visiting Barbrook Way frequently due to drainage issues and confirming there is no drainage capacity
- Concern that UK Power cannot supply the required power infrastructure within the required timeframe
- The development would exacerbate air and noise pollution particularly impacting on children and the elderly

- Concerns about the privacy and impact on residential amenity of properties in Barbrook Way and Meadow View
- Concern that schools and GP surgery are already at capacity and there are limited shops in the area
- Development outside the village boundary would merge the rural village with neighbouring areas
- The site holds a status equivalent to Green Belt and is included in the Danbury Ridge Conservation zone
- Concerns about the loss of peaceful landscape, views, visual amenity and ambiance of the area
- The development will impact the aesthetic of PRoW and ancient footpath
- Concerns about loss of potential archaeological finds
- Over 700 objections submitted to planning application 25/001158/OUT.

CCC Response
The Council's Masterplan Procedure (October 2025) has been updated to cover three Masterplan routes, including planning/site briefs for smaller, less constrained sites. Site policies will be updated to reflect the relevant route for each site but the continued requirement for Masterplans for strategic sites and Special Policy Areas will ensure that they satisfy the requirements of their respective plan policies. This can include delivery of all necessary infrastructure and ensuring that new development is delivered as part of a cohesive approach.
The Council consulted on an updated draft Planning Obligations Supplementary Planning Document alongside the Pre-Submission (Regulation 19) Local Plan Document. The draft SPD sets out details for securing contributions.
The site allocation is supported by the plan evidence base including a Strategic Flood Risk Assessment, Landscape Sensitivity, Archaeology Assessment and Capacity Study 2024 and traffic modelling. The Additional Sites Housing Site Studies (October 2025) considers that there are no overriding site constraints which mean that the site is unsuitable or undeliverable.
Heritage Impact Assessments have been undertaken site policies consider significance of designated and non-designated heritage assets.
In line with Anglian Water's Surface Water Risk Management Guidance and due to existing easements present on the site, a modification to restrict layout around sewage infrastructure is being proposed.
Site policy includes new requirements to undertake an archaeological assessment and to assess, and where appropriate mitigate, the potential cumulative effect on the designated features of Thrift Wood SSSI. A proposed modification to the policy is proposed to ensure developers will work closely with relevant local stakeholders, such as Natural England and the SSSI site managers (National Trust and Essex Wildlife Trust) to assess recreational pressure and provide the necessary mitigation measures for SSSIs.
The site is proposed for allocation to support increased housing requirements.
To meet our development needs it is inevitable that some agricultural land will be used for development
The Council is confident that the site can be accessed from Barbrook Way and that the site is deliverable.
Site policy includes requirements to provide new and enhanced cycle routes, footpaths, Public Rights of Way and, where appropriate, bridleways

The IIA Report assessed the option across a range of criteria, including accessibility and connectivity to services.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.
Site policy includes requirements to retain existing natural landscaping and trees, provide SuDS and ensure appropriate habitat mitigation and creation is provided.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
UK Power Networks are a Local Plan consultee and they have been consulted on the Local plan. They have not raised any concerns regarding constraints with the power supply network.
The Local Plan is informed by an Air Quality Assessment 2024 which overall concludes that the impact of the Local Plan in 2041 can be considered negligible for all pollutants.
Policy includes requirements to ensure the character, scale and layout haver regard to the site's surrounding context and to ensure a defensible landscape buffer on the site boundary.
The site policy requires financial contributions to services and facilities including education and healthcare provision, and to provide appropriate improvements, as necessary to the local and strategic road network.
Reference to RAMS was removed from each qualifying allocation in the Plan Review to avoid repetition. Explanatory text is set out in policies S4 and DM16. Natural England agreed this in a signed SOCG dated December 2024, and have reaffirmed this position.
It is not possible to meet all needs for new homes on brownfield sites so inevitable some land needs found on greenfield sites.

Location 17 – East Hanningfield

Strategic Growth Site Policy 17c – Land South of Rough Hill Complex, The Tye, East Hanningfield

Key statistics:

Consultation point	**Total number of responses**
Strategic Growth Site Policy 17c – Land South of Rough Hill Complex, The Tye, East Hanningfield	94

Summary of Representations – main issues and requested changes:

- Supportive of the allocation, the trajectory and the policy requirements (Gladman Developments Ltd AS-993)
- Supports the requirement for development to accord with a masterplan approved by CCC. The building height limit of two storeys should also be

applied to the eastern edge of the development to reduce adverse landscape impacts (Essex County Council AS-1086)

- Supports the provision of a new 56 place stand-alone nursery on SGS 11c to serve the proposed developments at East Hanningfield and Bicknacre (Essex County Council AS-1085)
- Supports policy requirement for suitable flood risk management and SuDS, and network of multifunctional green infrastructure and would welcome reference to Anglian Water's Surface Water Risk Management Guidance in the reasoned justification (Anglian Water Services Ltd AS-1098)
- Supports requirements to demonstrate sufficient wastewater treatment and disposal. There is currently no headroom at SWF WRC, and dry weather flow would exceed permit by the end of the Plan period. Anglian Water would only support a planning application with a pre-occupancy condition until the growth scheme is delivered. Recommends phasing smaller sites to complete in 2029/30 to align with the scheme (Anglian Water Services Ltd AS-1098, AS-1144)
- Site is within the SWF WWTW area which is operating in exceedance of its environmental permit for discharge volume. Anglian Water has identified a growth scheme, although additional allocated sites may present challenges in the short to medium term. May be necessary to consider phasing to align with the scheme. Supports the site specific policy requirement to demonstrate that there is sufficient WWTW capacity (Environment Agency AS-645)
- The policy requirement relating to demonstrating and providing for sufficient wastewater treatment capacity is not necessary. It is not for the planning system to replicate requirements that are addressed by other legislative regimes, nor is it for developers to have to demonstrate there will be capacity (Gladman Developments Ltd, AS-993)
- Site lies within the zone of influence of the Essex Coast RAMS and should include policy requirements to secure RAMS tariff payments (Natural England AS-1116)
- Recommends alternative designs and layouts to reduce the impact on Willis Farmhouse, and the East Hanningfield and The Tye Conservation Area. If harm cannot be substantially reduced the site should be removed from the Plan (Historic England AS-128)
- Development would lie outside the defined settlement boundary, on greenfield land that currently provides for footpaths, beautiful landscape views, and wildlife. The Conservation Area is an integral and sensitive feature of the village (Little Baddow History Centre AS-668)
- Traffic concerns for Old Church Road, Back Lane, and junctions with Main Street and Old Church Road, and transport links are limited (Little Baddow History Centre AS-668)
- The school could not accommodate children from the proposed development. There are no healthcare facilities in the village (Little Baddow History Centre AS-668)
- The proposed developments in East Hanningfield are of a disproportionate scale to the village and are not supported by sufficient infrastructure capacity. Unless the proposed developments in East Hanningfield are removed, significantly reduced, or shifted to sustainable locations with adequate infrastructure, the Parish Council consider the Local Plan unsound (East

Hanningfield Parish Council AS-165, West Hanningfield Parish Council AS-246)

- Object to the development due to inadequate infrastructure, with rail, road, education, doctors, dentists, and veterinary infrastructure and facilities operating at full capacity (Stow Maries Parish Council AS-1028)
- The scale of development would be disproportionate to the size of the village and available services and facilities in East Hanningfield (Richborough AS-469)
- Existing infrastructure, including transport, education, healthcare, sewerage, water supply, flood prevention, shops, employment opportunities, telecommunication, utilities, and other facilities, and the current scale of East Hanningfield cannot support the proposed scale of this development, individually or cumulatively alongside other proposed developments
- Concern that required infrastructure improvements would not be delivered sufficiently in advance of development
- Sustainable brownfield alternatives and/or other more sustainable sites should be considered first
- Development would not meet local housing needs, so it must include generous provision of affordable housing
- Vehicles speeding through the village is a common occurrence
- The lack of public transport opportunities in East Hanningfield would render the development unsustainable
- Development would lead to increased traffic congestion, reduced safety particularly for vulnerable users, increased pollution, and further deterioration of road conditions
- Impacts arising from the development, including in relation to biodiversity, air quality, and water management, have not been adequately addressed or mitigated
- Development would harm the local historic and natural environment, countryside, and rural character and identity of the area
- Development would exacerbate flood risk, particularly in relation to the Old Church Road pumping station
- Development would lead to the loss of agricultural land
- Development would lead to increased noise and other pollution
- Development would lead to increased risk of fires and crime
- Development of this scale adjacent to a rural village amounts to sprawl
- A gas pipeline runs under the site
- Development would reduce the value of existing homes
- The DtC has not been complied with as there is no clear evidence of constructive, active and ongoing engagement with key infrastructure bodies relating to infrastructure capacity issues in East Hanningfield
- Reduce or remove this development from the Plan.

CCC Response
The Additional Sites - Landscape Sensitivity and Capacity Study has informed the site requirements for landscape. The full details of these will be considered as part of the future masterplan and planning application for the site in accordance with wider Local Plan policies.

A minor amendment to the site policy and reasoned justification to provide an open landscape buffer and restrictions on density is proposed to reduce the impact on Willis Farmhouse, and the East Hanningfield and The Tye Conservation Area.
The Local Plan should be read as a whole, and other policies will ensure there will be sufficient waste water capacity to serve the development. For example, 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 or that such capacity can be delivered by the proposal.
To avoid duplication in the Plan, rather than modifying all site policies, a modification is proposed to the reasoned justification of Policy DM18 to include reference to Anglian Water's Surface Water Risk Management Guidance.
It would not be prudent to change the phasing of 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. In addition, the housing trajectory is updated annually providing reliable data to increase capacity accordingly.
Reference to RAMS was removed from each qualifying allocation in the Plan Review to avoid repetition. Explanatory text is set out in policies S4 and DM16. Natural England agreed this in a signed SOCG dated December 2024, and have reaffirmed this position.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
The site policy requires financial contributions to services and facilities including education and healthcare provision, and to provide appropriate improvements, as necessary to the local and strategic road network.
The Council's Infrastructure Delivery Plan (IDP) sits alongside the Local Plan. This assesses the current status of infrastructure across Chelmsford and identifies what new infrastructure investment is required to support the Local Plan growth, when it is needed, and funding sources.
Affordable housing is required within the site policy.
Not all development plan allocations can be accommodated on previously developed land, and some greenfield sites will be necessary to deliver sustainable and logical extensions to defined settlement boundaries.
The site allocation is supported by the plan evidence base including Sequential and Exception Test, Water Cycle Study, Landscape Sensitivity and Capacity Study and traffic modelling. The Additional Sites Housing Sites Studies October 2025 (PL018) demonstrates how the site can be developed to achieve the proposed number of homes and supporting land uses such as open space and sustainable urban drainage systems (SuDS). The site allocation is considered a sustainable and deliverable locations for development and consistent with the plan priorities and other policies including the Spatial Strategy.
The proposed housing growth is considered appropriate and proportionate to the size of the village and is underpinned by an up-to-date evidence base.

Strategic Growth Site Policy 17d – Land South and South East of East Hanningfield Village

Key statistics:

Consultation point	Total number of responses
Strategic Growth Site Policy 17d – Land South and South East of East Hanningfield Village	96

Summary of Representations – main issues and requested changes:

- Supportive of the allocation, the trajectory and the policy requirements (Gladman Developments Ltd AS-993)
- Supports the requirement for development to accord with a masterplan approved by CCC. The building height limit of two storeys should also be applied to the eastern and southern edges of the development setback from substantial planted buffers to reduce adverse landscape impacts (Essex County Council AS-1087)
- Support the provision of a new 56 place stand-alone nursery on SGS 11c to serve the proposed developments at East Hanningfield and Bicknacre (Essex County Council AS-1087)
- Supports the HIA and identified suitable mitigation measures, including additional screening and increased planting belts along the eastern boundary, and careful consideration of layout, scale, and design (including limitation to two storeys). Supports the inclusion of these as criteria within the policy and supporting text (Historic England AS-1009)
- Supports policy requirement for suitable flood risk management and SuDS, and network of multifunctional green infrastructure and would welcome reference to Anglian Water's Surface Water Risk Management Guidance (Anglian Water Services Ltd AS-1100)
- Supports requirements to demonstrate sufficient wastewater treatment and disposal. There is currently no headroom at SWF WRC, and dry weather flow would exceed permit by the end of the Plan period. Anglian Water would only support a planning application with a pre-occupancy condition until the growth scheme is delivered. Recommends phasing smaller sites to complete in 2029/30 to align with the scheme (Anglian Water Services Ltd AS-1100, AS-1145)
- Site is within the SWF WWTW area which is operating in exceedance of its environmental permit for discharge volume. Anglian Water has identified a growth scheme, although additional allocated sites may present challenges in the short to medium term. May be necessary to consider phasing to align with the scheme. Supports the site specific policy requirement to demonstrate that there is sufficient WWTW capacity (Environment Agency AS-724)
- Rising main (pressurised sewer) within the site. Requirement to protect existing sewers and their easements should be included (Anglian Water Services Ltd AS-1100)

- Site lies within the zone of influence of the Essex Coast RAMS and should include policy requirements to secure RAMS tariff payments (Natural England AS-1117)
- The proposed developments in East Hanningfield are of a disproportionate scale to the village and are not supported by sufficient infrastructure capacity. Unless the proposed developments in East Hanningfield are removed, significantly reduced, or shifted to sustainable locations with adequate infrastructure, the Parish Council consider the Local Plan unsound (East Hanningfield Parish Council AS-390, West Hanningfield Parish Council AS-371)
- Object to the development due to inadequate infrastructure, with rail, road, education, doctors, dentists, and veterinary infrastructure and facilities operating at full capacity (Stow Maries Parish Council AS-1029)
- Development would lie outside the defined settlement boundary, on greenfield land that currently provides for footpaths, beautiful landscape views, and wildlife. The Conservation Area is an integral and sensitive feature of the village (Little Baddow History Centre AS-669)
- Traffic concerns for Old Church Road, Back Lane, and junctions with Main Street and Old Church Road, and transport links are limited (Little Baddow History Centre AS-669)
- The school could not accommodate children from the proposed development. There are no healthcare facilities in the village (Little Baddow History Centre AS-669)
- The scale of development would be disproportionate to the size of the village and available services and facilities in East Hanningfield (Richborough AS-971)
- Existing infrastructure, including transport, education, healthcare, sewerage, water supply, flood prevention, shops, employment opportunities, telecommunication, utilities, and other facilities, and the current scale of East Hanningfield cannot support the proposed scale of this development, individually or cumulatively alongside other proposed developments
- Concern that required infrastructure improvements would not be delivered sufficiently in advance of development
- Sustainable brownfield alternatives and/or other more sustainable sites should be considered first
- Development would not meet local housing needs, so it must include generous provision of affordable housing
- Vehicles speeding through the village is a common occurrence
- Development would lead to increased traffic congestion, reduced safety particularly for vulnerable users, increased pollution, and further deterioration of road conditions
- The lack of public transport opportunities in East Hanningfield would render the development unsustainable
- Impacts arising from the development, including in relation to biodiversity, air quality, and water management, have not been adequately addressed or mitigated
- Development would harm the local historic and natural environment, countryside, and rural character and identity of the area

- Concern that development would exacerbate flood risk, particularly in relation to the Old Church Road pumping station
- Development would lead to the loss of agricultural land
- Development would lead to increased noise and other pollution
- Development of this scale adjacent to a rural village amounts to sprawl
- A gas pipeline runs under the site
- Development would reduce the value of existing homes
- The DtC has not been complied with as there is no clear evidence of constructive, active and ongoing engagement with key infrastructure bodies relating to infrastructure capacity issues in East Hanningfield
- Reduce or remove this development from the Plan.

CCC Response
The Additional Sites - Landscape Sensitivity and Capacity Study has informed the site requirements for landscape. The full details of these will be considered as part of the future masterplan and planning application for the site in accordance with wider Local Plan policies.
In line with Anglian Water's Surface Water Risk Management Guidance and due to existing easements present on the site, a modification to restrict layout around sewage infrastructure is being proposed.
The Local Plan should be read as a whole, and other policies will ensure there will be sufficient waste water capacity to serve the development. For example, 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 or that such capacity can be delivered by the proposal.
It would not be prudent to change the phasing of 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. In addition, the housing trajectory is updated annually providing data to increase capacity accordingly.
Reference to RAMS was removed from each qualifying allocation in the Plan Review to avoid repetition. Explanatory text is set out in policies S4 and DM16. Natural England agreed this in a signed SOCG dated December 2024, and have reaffirmed this position.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
Not all development plan allocations can be accommodated on previously developed land, and some greenfield sites will be necessary to deliver sustainable and logical extensions to defined settlement boundaries.
The site policy requires financial contributions to services and facilities including education and healthcare provision, and to provide appropriate improvements, as necessary to the local and strategic road network.
The Council's Infrastructure Delivery Plan (IDP) sits alongside the Local Plan. This assesses the current status of infrastructure across Chelmsford and identifies what new infrastructure investment is required to support the Local Plan growth, when it is needed, and funding sources.

The site allocation is supported by the plan evidence base including Strategic Flood Risk Assessment, Sequential and Exception Test, Water Cycle Study, Landscape Sensitivity and Capacity Study and traffic modelling. The Additional Sites Housing Sites Studies October 2025 (PL018) demonstrates how the site can be developed to achieve the proposed number of homes and supporting land uses such as open space and sustainable urban drainage systems (SuDS). The site allocation is considered a sustainable and deliverable locations for development and consistent with the plan priorities and other policies including the Spatial Strategy.
The proposed housing growth is considered appropriate and proportionate to the size of the village and is underpinned by an up-to-date evidence base.

Growth Site Policy 17e – Land South of Windmill Farm, Back Lane, East Hanningfield

Key statistics:

Consultation point	**Total number of responses**
Growth Site Policy 17e – Land South of Windmill Farm, Back Lane, East Hanningfield	96

Summary of Representations – main issues and requested changes:

- Supportive of the allocation and the policy requirements, although potential yield could be higher (Eugene Kinsella AS-346)
- Support the provision of a new 56 place stand-alone nursery on SGS 11c to serve the proposed developments at East Hanningfield and Bicknacre (Essex County Council AS-1088)
- Supports the HIA and identified mitigation measures, including a carefully considered layout, scale, and design, including a limitation of two storeys in height, setbacks on the west and north sides, and a low-density rural character. Supports the inclusion of these as criteria within the policy and supporting text (Historic England AS-1010)
- Supports policy requirement for suitable flood risk management and SuDS, and network of multifunctional green infrastructure and would welcome reference to Anglian Water's Surface Water Risk Management Guidance in the reasoned justification (Anglian Water Services Ltd AS-1101)
- Supports requirements to demonstrate sufficient wastewater treatment and disposal. There is currently no headroom at SWF WRC, and dry weather flow would exceed permit by the end of the Plan period. Anglian Water would only support a planning application with a pre-occupancy condition until the growth scheme is delivered. Recommends phasing smaller sites to complete in 2029/30 to align with the scheme (Anglian Water Services Ltd AS-1101, AS-1146)
- Site is within the SWF WWTW area which is operating in exceedance of its environmental permit for discharge volume. Anglian Water has identified a growth scheme, although additional allocated sites may present challenges in

the short to medium term. May be necessary to consider phasing to align with the scheme. Supports the site specific policy requirement to demonstrate that there is sufficient WWTW capacity (Environment Agency AS-725)

- Site lies within the zone of influence of the Essex Coast RAMS and should include policy requirements to secure RAMS tariff payments (Natural England AS-1118)
- The proposed developments in East Hanningfield are of a disproportionate scale to the village and are not supported by sufficient infrastructure capacity. Unless the proposed developments in East Hanningfield are removed, significantly reduced, or shifted to sustainable locations with adequate infrastructure, the Parish Council consider the Local Plan unsound (East Hanningfield Parish Council AS-391, West Hanningfield Parish Council AS-372)
- Development helps maintain the vitality of settlements and generates investment in infrastructure
- Object to the development due to inadequate infrastructure, with rail, road, education, doctors, dentists, and veterinary infrastructure and facilities operating at full capacity (Stow Maries Parish Council AS-1030)
- Development would lie outside the defined settlement boundary, on greenfield land that currently provides for footpaths, beautiful landscape views, and wildlife. The Conservation Area is an integral and sensitive feature of the village (Little Baddow History Centre AS-670)
- Traffic concerns for Old Church Road, Back Lane, and junctions with Main Street and Old Church Road and transport links are limited (Little Baddow History Centre AS-670)
- The school could not accommodate children from the proposed development. There are no healthcare facilities in the village (Little Baddow History Centre AS-670)
- The scale of development would be disproportionate to the size of the village and available services and facilities in East Hanningfield (Richborough AS-972)
- Existing infrastructure, including transport, education, healthcare, sewerage, water supply, flood prevention, shops, employment opportunities, telecommunication, utilities, and other facilities, and the current scale of East Hanningfield cannot support the proposed scale of this development, individually or cumulatively alongside other proposed developments
- Vehicles speeding through the village is a common occurrence
- Development would lead to increased traffic congestion, reduced safety particularly for vulnerable users, increased pollution, and further deterioration of road conditions
- The lack of public transport opportunities in East Hanningfield would render the development unsustainable
- Concern that required infrastructure improvements would not be delivered sufficiently in advance of development
- Sustainable brownfield alternatives and/or other more sustainable sites should be considered first
- Development would not meet local housing needs, so it must include generous provision of affordable housing

- Impacts arising from the development, including in relation to biodiversity, air quality, and water management, have not been adequately addressed or mitigated
- Development would harm the local historic and natural environment, countryside, and rural character and identity of the area
- Concern that development would exacerbate flood risk, particularly in relation to the Old Church Road pumping station
- Development would lead to the loss of agricultural land
- Development would lead to increased noise and other pollution
- Development of this scale adjacent to a rural village amounts to sprawl
- A gas pipeline runs under the site
- Development would reduce the value of existing homes
- The DtC has not been complied with as there is no clear evidence of constructive, active and ongoing engagement with key infrastructure bodies relating to infrastructure capacity issues in East Hanningfield
- Statements of common ground should be agreed to ensure infrastructure delivery
- Reduce or remove this development from the Plan.

CCC Response
The Additional Sites - Landscape Sensitivity and Capacity Study has informed the site requirements for landscape. The full details of these will be considered as part of the future masterplan and planning application for the site in accordance with wider Local Plan policies.
The Local Plan should be read as a whole, and other policies will ensure there will be sufficient waste water capacity to serve the development. For example, 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 or that such capacity can be delivered by the proposal.
It would not be prudent to change the phasing of 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. In addition, the housing trajectory is updated annually providing data to increase capacity accordingly.
Reference to RAMS was removed from each qualifying allocation in the Plan Review to avoid repetition. Explanatory text is set out in policies S4 and DM16. Natural England agreed this in a signed SOCG dated December 2024, and have reaffirmed this position.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
The site policy requires financial contributions to services and facilities including education and healthcare provision, and to provide appropriate improvements, as necessary to the local and strategic road network.
The Council's Infrastructure Delivery Plan (IDP) sits alongside the Local Plan. This assesses the current status of infrastructure across Chelmsford and identifies what new infrastructure investment is required to support the Local Plan growth, when it is needed, and funding sources.

The site allocation is supported by the plan evidence base including Sequential and Exception Test, Water Cycle Study, Landscape Sensitivity and Capacity Study and traffic modelling. The Additional Sites Housing Sites Studies October 2025 (PL018) demonstrates how the site can be developed to achieve the proposed number of homes and supporting land uses such as open space and sustainable urban drainage systems (SuDS). The site allocation is considered a sustainable and deliverable locations for development and consistent with the plan priorities and other policies including the Spatial Strategy.
The proposed housing growth is considered appropriate and proportionate to the size of the village and is underpinned by an up-to-date evidence base.

Location 20 – Rettendon Place

Strategic Growth Site Policy 20 – Land to East and North of Rettendon Place

Key statistics:

Consultation point	**Total number of responses**
Strategic Growth Site Policy 20 – Land to East and North of Rettendon Place	95

Summary of Representations – main issues and requested changes:

- Supports the proposed allocation and is keen to work with CCC and other stakeholders to refine the proposals (Croudace Homes AS-410)
- Supports policy requirement for suitable flood risk management and SuDS, and network of multifunctional green infrastructure and would welcome reference to Anglian Water's Surface Water Risk Management Guidance in the reasoned justification (Anglian Water Services Ltd AS-1102)
- Supports requirements to demonstrate sufficient wastewater treatment and disposal. There is currently no headroom at SWF WRC, and dry weather flow would exceed permit by the end of the Plan period. Anglian Water would only support a planning application with a pre-occupancy condition until the growth scheme is delivered. Recommends phasing smaller sites to complete in 2029/30 to align with the scheme (Anglian Water Services Ltd AS-1102, AS-1147)
- Site is within the SWF WWTW area which is operating in exceedance of its environmental permit for discharge volume. Anglian Water has identified a growth scheme, although additional allocated sites may present challenges in the short to medium term. May be necessary to consider phasing to align with the scheme. Supports the site specific policy requirement to demonstrate that there is sufficient WWTW capacity (Environment Agency AS-726)
- Gravity sewers and a surface water sewer and discharge point within the site. Requirement to protect existing sewers and their easements should be included (Anglian Water Services Ltd AS-1102)
- Supports the HIA and identified suitable mitigation measures, including detailed design needing to pay particular attention to landscape screening, building heights, and silhouettes to protect these key views from the south.

Supports the inclusion of these as criteria within the policy and supporting text, and the policy requirement for a further, detailed HIA/LVIA to accompany and inform any planning application to consider the impact of development and set out appropriate mitigation measures (Historic England AS-157)

- Acknowledges the expansion of the existing primary school and early years provision and would welcome early engagement to ensure that security requirements do not conflict with Department for Education requirements (Essex Police AS-989)
- Supports the primary education and early years policy requirements. ECC expects the land to be provided by the developer and a proportionate developer contribution to enable either the expansion of the existing nursery or the provision of a new nursery (Essex County Council AS-1082)
- Objects as the development would cause substantial and irreversible loss of Green Belt and harm to the natural environment and visual character of the area (Runwell Parish Council AS-39)
- Object to the development due to inadequate infrastructure and appropriate mitigation, individually or cumulatively alongside other proposed developments and existing infrastructure needs, including issues with rail, road, water supply, education and healthcare facilities, telecommunications, utilities, sewage network, flood mitigation, and veterinary infrastructure and facilities operating at full capacity (Stow Maries Parish Council AS-1031, Runwell Parish Council AS-39, Rettendon Parish Council AS-1052)
- Development has poor accessibility and is of a scale that is disproportionate to the existing settlement (Rettendon Parish Council AS-1052)
- Object to the development due to the adverse impact on the environment and wildlife
- New development should not be built on agricultural land
- The size of Rettendon will increase dramatically. It would be better to spread the growth across a wider geography
- The development would not be consistent with Rettendon's role in the settlement hierarchy
- Development would harm the significance of heritage assets
- The development poses a threat to the rural and idyllic nature of the local area
- Development will affect local vistas and cause light pollution at night
- Concern over the disruption caused during construction
- Concern over the legitimacy of the Local Planning Authority. If the new unitary authority comes into force, it could supersede the existing local authority in the next year or so. It should therefore be the responsibility of the new authority to make these plans rather than the existing local authority which may not exist for much longer
- The Local Plan fails to address the impact of the development proposals on the existing commercial fishing lake. The addition of 350 homes near the lake would negatively affect the rural business and the local amenity. A buffer zone would be needed to protect the commercial interests of the fishing lake business.

CCC Response
Anglian Water's responses have been used by CCC to understand and respond to matters of concern raised in this You Said We Did report and to inform proposed modifications including in relation to utility easements and sewers.
CCC welcomes ongoing engagement to ensure that security requirements do not conflict with Department for Education requirements
To meet our development needs it is inevitable that some agricultural land will be used for development.
The site allocation is supported by the plan evidence base including an Infrastructure Delivery Plan and traffic modelling. The site policy requires financial contributions to services and facilities including education and healthcare provision, and to provide appropriate improvements, as necessary to the local and strategic road network.
The Council commissioned Essex Highways to review and consider the key issues raised in the highway and transportation responses received to the consultation. This is given in Appendix 2 and includes a review of representations received from members of the public. Essex Highways response has been used by CCC to understand and respond to matters of concern raised in this You Said We Did report and to inform any proposed minor modifications to the Local Plan.
The IIA Report assessed the option across a range of criteria, including accessibility and connectivity to services.
Local Plan Strategic Policy S4 sets requirements to conserve and enhance the natural environment and paragraph 5.46 sets out that New development should minimise pollution of the natural environment including potential light pollution from glare and spillage on intrinsically dark landscapes and nature conservation.
Any impact on amenities from construction activity is a relative short term impact which can be managed by appropriate planning conditions as part of any future planning application.
The Plan is being prepared under the governance of Chelmsford City Council.
The site allocation is supported by the plan evidence base including landscape sensitivity and capacity assessments, heritage assessments, IIA and wildlife reviews. Site specific potential impacts on the nearby commercial fishing lake would be considered as part of the planning application process.
The proposed housing growth is considered appropriate and proportionate to the size of the village and is underpinned by an up-to-date evidence base.

Location 21 – Woodham Ferrers

Growth Site Policy 21a – Land North of Old Rectory Lodge, Main Road, Woodham Ferrers

Key statistics:

Consultation point	Total number of responses
Growth Site Policy 21a – Land North of Old Rectory Lodge, Main Road, Woodham Ferrers	8

Summary of Representations – main issues and requested changes:

- Support for the allocation, policy requirements and housing trajectory (Birkett Hall Homes Ltd AS-563)
- Supports policy requirement for suitable flood risk management and SuDS, and network of multifunctional green infrastructure and would welcome reference to Anglian Water's Surface Water Risk Management Guidance in the reasoned justification (Anglian Water Services Ltd AS-1103)
- Supports requirements to demonstrate sufficient wastewater treatment and disposal. There is currently no headroom at SWF WRC, and dry weather flow would exceed permit by the end of the Plan period. Anglian Water would only support a planning application with a pre-occupancy condition until the growth scheme is delivered. Recommends phasing smaller sites to complete in 2029/30 to align with the scheme (Anglian Water Services Ltd AS-1103, AS-1148)
- Site is within the SWF WWTW area which is operating in exceedance of its environmental permit for discharge volume. Anglian Water has identified a growth scheme, although additional allocated sites may present challenges in the short to medium term. May be necessary to consider phasing to align with the scheme. Supports the site specific policy requirement to demonstrate that there is sufficient WWTW capacity (Environment Agency AS-727)
- Rising main (pressurised sewer) within the site. Requirement to protect existing sewers and their easements should be included (Anglian Water Services Ltd AS-1103)
- Concern that current infrastructure cannot cope and new development will not be accompanied by improved infrastructure e.g. schools, doctors, dentists, local transport.

CCC Response
The Local Plan should be read as a whole, and other policies will ensure there will be sufficient waste water capacity to serve the development. For example, 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 or that such capacity can be delivered by the proposal.
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 being served by this WRC. In addition, the housing trajectory is updated annually.
Minor modification will be proposed to ensure the layout safeguards suitable access for the maintenance of sewerage infrastructure.
The site allocation is supported by the plan evidence base including Strategic Flood Risk Assessments, Sequential and Exception Test, Water Cycle Studies, Landscape Sensitivity and Capacity Study, Air Quality Assessment and traffic modelling. The Additional Sites Housing Sites Studies October 2025 (PL018) demonstrates how the site can be developed to suitable achieve the proposed number of homes and supporting land uses such as open space and sustainable

urban drainage systems (SuDS). The site allocation is considered a sustainable and deliverable locations for development and consistent with the plan priorities and other policies including the Spatial Strategy.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
The site policy requires financial contributions to services and facilities including education and healthcare provision, and to provide appropriate improvements, as necessary to the local and strategic road network.

Growth Site Policy 21b – Land North of Congregational Church, Main Road, Woodham Ferrers

Key statistics:

Consultation point	**Total number of responses**
Growth Site Policy 21b – Land North of Congregational Church, Main Road, Woodham Ferrers	9

Summary of Representations – main issues and requested changes:

- Support for the allocation, policy requirements and housing trajectory (Birkett Hall Homes Ltd AS-563)
- Supports policy requirement for suitable flood risk management and SuDS, and network of multifunctional green infrastructure and would welcome reference to Anglian Water's Surface Water Risk Management Guidance in the reasoned justification (Anglian Water Services Ltd AS-1104)
- Supports requirements to demonstrate sufficient wastewater treatment and disposal. There is currently no headroom at SWF WRC, and dry weather flow would exceed permit by the end of the Plan period. Anglian Water would only support a planning application with a pre-occupancy condition until the growth scheme is delivered. Recommends phasing smaller sites to complete in 2029/30 to align with the scheme (Anglian Water Services Ltd AS-1104, AS-1149)
- Site is within the SWF WWTW area which is operating in exceedance of its environmental permit for discharge volume. Anglian Water has identified a growth scheme, although additional allocated sites may present challenges in the short to medium term. May be necessary to consider phasing to align with the scheme. Supports the site specific policy requirement to demonstrate that there is sufficient WWTW capacity (Environment Agency AS-728)
- Extend site to the north to include the former builders yard. Existing rights of way may hamper the future development of the northern part of the site
- Concern that current infrastructure cannot cope and new development will not be accompanied by improved infrastructure e.g. schools, doctors, dentists, local transport.

CCC Response
The Local Plan should be read as a whole and other policies will ensure there will be sufficient waste water capacity to serve the development. For example, 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 or that such capacity can be delivered by the proposal.
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 being served by this WRC. In addition, the housing trajectory is updated annually.
Minor modification will be proposed to ensure the layout safeguards suitable access for the maintenance of sewerage infrastructure.
There is no public right of way (PROW) in the northern part of the GS21b but a PROW runs along the northern boundary of GS21a. Sufficient land has been allocated in the Local Plan to meet the Council's housing needs for the period of the plan.
The site allocation is supported by the plan evidence base including Sequential and Exception Test, Water Cycle Studies, Landscape Sensitivity and Capacity Study, Air Quality Assessment and traffic modelling. The Additional Sites Housing Sites Studies October 2025 (PL018) demonstrates how the site can be developed to achieve the proposed number of homes and supporting land uses such as open space and sustainable urban drainage systems (SuDS). The site allocation is considered a sustainable and deliverable location for development and consistent with the plan priorities and other policies including the Spatial Strategy.
The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.
The site policy requires financial contributions to services and facilities including education and healthcare provision, and to provide appropriate improvements, as necessary to the local and strategic road network.

Key Consequential Changes

This section of the consultation document provides focused changes to specific parts of the Pre-Submission Local Plan to reflect the proposed additional site allocation policies. These are called key consequential changes and are shown as tracked changes in this part of the Additional Sites Document.

Strategic Policy S6 – Housing and Employment Requirements

Key statistics:

Consultation point	Total number of responses
Strategic Policy S6 – Housing and Employment Requirements	36

Summary of Representations – main issues and requested changes:

- An increase in the housing requirement will increase demand for employment space. Essex and Suffolk Water can only support employment developments that are necessary and appropriate and designed to achieve the highest standards of water efficiency (Essex and Suffolk Water AS-155)
- Supports the policy, including the Housing Supply Table (Croudace Homes AS-412)
- Plan makes provision for only 84% of the Council's local housing need as defined in the Standard Method (Bloor Homes AS-474, Croudace Homes AS-910, Gay Bowers Limited AS-169, Oliver Ricketts AS-319, Hallam Land Management AS-948, Martin Grant Homes, AS-1062, Dandara AS-1134, Obsidian Strategic AS-1142, The Bucknell Family AS-1127, Iceni AS-1152, Higgins Homes AS-389, Greystoke CB AS-1079)
- Insufficient buffer (8.3%) between housing need and supply (Bloor Homes AS-474, Martin Grant Homes AS-129, Dandara AS-1134, AS-1137, AS-1140, Obsidian Strategic AS-1142)
- Over-reliance on windfall delivery (10% of supply) (Bloor Homes AS-474)
- Plan does not appreciate the urgency of providing 'special needs housing' (J&T Wardrop and the Wardrop Trust AS-1053)
- Plan does not take account of slower than anticipated build-out rates and risks associated with the delivery of new settlements including delivery of significant infrastructure projects (Dandara AS-1134, AS-1137, AS-1140)
- Notes current slippage in the delivery of housing from sites allocated in the adopted Local Plan (Dandara AS-1134, AS-1137, Obsidian Strategic AS-1142, Higgins Homes AS-389)
- Uncertainty around delivery of the sites means that the Plan is making provision for less than 80% of local housing need and therefore does not comply with the transitional arrangements in the NPPF (Obsidian Strategic Asset Management Ltd AS-654)
- Question whether the Council can still rely on the transitional provisions given that the Additional Sites consultation amends the Regulation 19 Plan, and it was not available prior to the 12th March 2025 cut off required by paragraph 234 and footnote 82 of the December 2024 Framework (Dandara AS-1134, AS-1137, Greystoke CB AS-1079)
- Given timescales for likely adoption, the Plan period should be revised to 2028 - 2043 and the Plan should allocate sites to meet that plan-period (Iceni AS-1152, Greystoke CB AS-1079)
- Issue of no longer being able to demonstrate five year housing land supply within six months of publication of Regulation 19 Plan. This emphasises necessity for the Plan to retain considerable flexibility, allowing the Council to adapt to evolving circumstances and maximise the contribution of deliverable sites to avoid ongoing housing land supply failure (CHP AS-955, 956, M Scott Properties Ltd AS-1121, Rosehart Properties Ltd AS-238)
- Inconsistency in housing land supply position - the IIA (para 2.3.1) says 3.88 years and Focused Consultation document (para 1.4) says 4.93 years on submission of Plan without additional sites (Croudace Homes AS-908)

- On submission/ adoption, the Council will be unable to demonstrate a five year housing land supply, and the new Plan will require immediate review (Bloor Homes (Eastern) AS-453, Croudace Homes AS-910, The Bucknell Family AS-1127, Higgins Homes AS-389)
- Plan should include a policy which commits the Council to undertaking an immediate/early update of the Plan to ensure housing needs are met in full (Iceni AS-1152, Higgins Homes AS-389, John Hart AS-471, Rosehart Properties Ltd AS-238, Simon Knight AS-418)
- Plan does not address issues of unaffordability or homelessness (Hallam Land Management AS-948, Higgins Homes AS-389)
- Plan should allocate less than 162,646 sqm of employment floorspace. Reference is made to Lichfield's December 2024 evidence which recommends the Council use Scenario 1 as a starting point (Boreham Conservation Society AS-1019)
- The calculation of employment requirement is flawed because it justifies the increase from 162,646sqm to 173,146sqm based on meeting an increased labour supply arising from higher housing numbers under the 2024 NPPF, but the Council is not meeting the minimum housing numbers under 2024 NPPF (Greystoke CB AS-1083)
- Plan makes insufficient provision for employment land to meet labour supply needs. The ELR method under-estimates the need because it makes no allowance for losses, assumes low job densities and provides no buffer (Greystoke CB AS-1083)
- No assessment has been undertaken to consider strategic logistics need, as required in the NPPF and PPG (Greystoke CB AS-1083)
- Policy S6 should define job number targets in place of floorspace requirements (Greystoke CB AS-1083)
- Windfall allowance calculation is incorrect because the new sites that have been identified should be deducted from the total windfall figure
- Include measures in the Plan to reduce the need for additional housing.

CCC Response
The housing requirement in the plan meets at least 80% of the revised standard method housing need in line with the Government's latest plan-making transitional arrangements. This is consistent with the NPPF's objective of preparing and maintaining up to-date plans in order to make consistent provision for housing and other needs.
Reallocating the supply buffer and undertaking an Additional Site Consultation to be able to demonstrate that we can achieve a revised Housing Requirement that meets the NPPF transition arrangements is pragmatic and appropriate as the Council had already prepared and consulted on an evidence base to support a spatial strategy of this quantum and has updated its housing evidence to support the revised housing requirement.
There is no national requirement for a buffer to be allocated in the supply trajectory as the NPPF manages risks to supply through the need to maintain a 5 year land supply and the Housing Delivery Test. Also Para 78c of the NPPF 2024 states that for decision-making a 20% buffer is applied to the 5 year supply of specific deliverable sites where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of the

Framework and whose annual average housing requirement is 80% or less of the most up to date local housing need figure calculated using the standard method.
Windfall development comprises sites that have unexpectedly become available over time, and which were not anticipated by the council as part of a Local Plan. These sites are granted planning permission in accordance with adopted local and national policies and contribute towards housing figures.
Para 75 of the NPPF directs Local Planning Authorities to consider historic windfall delivery rates. The Submission Housing Topic Paper shows trends over a considerable length of time. Average rates assumed at Pre-Submission stage (175) were below the actual average (196) so have been increased to 195 per annum in the Additional Sites Consultation as justified by historic windfall completions.
Policy DM1 and individual site allocation policies set out requirements for new Specialist Residential Accommodation in line with the Strategic Housing Needs Assessment (November 2024).
The timing of new supply which include a mix of site typologies utilises information from developers and is explained further in the Submission Housing Topic Paper to reflect the latest Housing Site Schedule and the Additional Sites Consultation Document.
The Local Plan is anticipated to be adopted in late 2026 or early 2027 giving the plan a 14-15 year time period. Although this could be below the preferred 15 year time period set out in the NPPF, this is not a set requirement and would remain an appropriate time scale given that it is a 'transitional' plan and proposing strategic locations that will deliver beyond the plan period.
The initial Regulation 19 consultation was undertaken on the full draft or Pre-Submission Local Plan. The subsequent Regulation 19 consultation was focused on adding some new/expanded sites and consequential plan changes. It did not significantly change the content of the Pre-Submission Local Plan such as the Spatial Strategy. As such, the Regulation 19 Local Plan was available prior to the 12th March 2025 as required for transitional plans in Annex 1 of the NPPF 2024.
When the Additional Sites Document was published for consultation, the Council could demonstrate a 5YHLS of 3.88 years. This was forecast to be 4.93 years at Local Plan submission without the additional sites and 5.75 years with the additional sites.
As set out in Policy S13 a full or focused formal review of the Local Plan will commence two years after its adoption in line with national planning policy.
The Local Plan makes provision for new affordable housing over the plan period to help address affordability and homelessness including in Policy DM1 and individual site allocation policies. This is informed by the Strategic Housing Needs Assessment (November 2024). The national standard method also uses a formula that incorporates a baseline of local housing stock which is then adjusted upwards to reflect local affordability to identify the minimum number of homes expected to be planned for.
The policy is informed by the Chelmsford Employment Land Review (including the 2023 Report and Focused Update 2024) which considers the most up-to-date assumptions, guidance and data. The ELR considers the indigenous employment needs arising in Chelmsford and – where relevant – any needs identified from across the relevant Functional Economic Market Area. The approach to the ELR aligns with the PPG and represents an appropriate and proportionate basis for planning for longer-term employment needs including in relation to B8 workforce

jobs density. The plan exceeds the minimum employment requirements in the ELR over the plan period through flexible site allocations across a range of different locations and sizes alongside existing commitments. The use of 'around' employment floorspace figures in specific site allocation policies allows for an appropriate degree of flexibility in provision.

Strategic Policy S7 – The Spatial Strategy

Key statistics:

Consultation point	**Total number of responses**
Strategic Policy S7 – The Spatial Strategy	62

Summary of Representations – main issues and requested changes:

- Largely supports the Plan and recommends continued engagement with the Council to ensure that the increased housing requirements can be supported by upgrades to water supply beyond 2030 (Essex and Suffolk Water AS-155)
- Essex Police DOCO seeks early involvement in masterplanning and design coding to support the Spatial Strategy (Essex Police DOCO AS-985)
- Support inclusion of the additional sites in the focused consultation (Halley Developments AS-406, Mr & Mrs Thomasin - Foster & Wilkinson AS-907, AS-914, AS-943, AS-945, Welbeck Strategic Land V Limited AS-494, Mrs Mary Rance AS-914, CHP AS-956)
- Supportive of Spatial Strategy (Iceni AS-493, Welbeck Strategic Land V Limited AS-495)
- Supports inclusion of a broader mix of large, medium and small housing allocations within the policy (Croudace Homes AS-413)
- Plan should allocate additional small/ medium scale sites to ensure consistency with the NPPF (Bloor Homes (Eastern) AS-477, Landvest AS-481, AS-982, Essex Alms Housing AS399, AS-400, AS-401, Mr and Mrs B Hearn AS-407, J&T Wardrop and the Wardrop Trust AS-1053)
- Over-reliance on one large allocation to deliver a substantial proportion of the housing requirement (Dandara AS-1134, AS-1137, AS-1140, Obsidian Strategic AS-1142)
- Assess impacts on the SSSIs and Ancient Woodland at the Local Plan stage to consider cumulative impacts (National Trust AS-30)
- Local Plan should factor phased delivery where necessary due to infrastructure constraints and lead-in times for capital investment (Anglian Water Services Ltd AS-1151)
- Requirement to identify and safeguard land for new built healthcare infrastructure to support planned growth as well as financial contributions to mitigate development impact. It is likely that a new facility will be required during the Plan period to support development southeast of Chelmsford (Mid and South Essex Integrated Care Board AS-644)

- Concern that additional allocations prioritise less sustainable locations further down the settlement hierarchy over available sites in/around Chelmsford (Taylor Wimpey Strategic Land AS-387, Taylor Wimpey Strategic Land AS-12, Crest Nicholson AS-480, Vistry Strategic Land AS-1130, AS-1132, Marriage Family AS-457) including failing to optimise existing strategic growth areas (Barratt David Wilson AS-1068)
- The spatial strategy should be amended to identify suitable Grey Belt sites and a Green Belt Review should be undertaken to enable Green Belt release where exceptional circumstances exist (Essex Alms Housing AS-615, Obsidian Strategic AS-1143, Croudace Homes AS-910, AS-912, Rosehart Properties Ltd AS-239, John Hart AS-471, Martin Grant Homes AS-166, Essex Alms Housing AS-400, Vistry Strategic Land AS-1130, AS-1132, Taylor Wimpey Strategic Land AS-12, J&T Wardrop and the Wardrop Trust AS-1053, M Scott Properties Ltd AS-1123)
- Requests additional text for the Settlement Hierarchy to guide decisions on growth beyond allocated sites, including positive consideration of potential sites beyond settlement boundaries to support windfall delivery and housing supply (Gay Bowers Limited AS-106)
- Policy is unjustified as it prioritises short-term deliverability over the most sustainable spatial option (Strutt and Parker (Farms) Limited AS-1122)
- Further evidence required to demonstrate that proposed housing allocation numbers are realistic (Bloor Homes (Eastern) AS-477)
- Green Wedges should have been reviewed. Instead, site selection process has discounted sites within the Green Wedge as a matter of principle, rather than assessing whether individual sites could contribute positively to the Plan's objectives. (The Bucknell Family AS-1129, Cliffords Group Ltd AS-863) Van Diemans Property Company AS-816, The Bucknell Family AS-1129, Obsidian Strategic Asset Management Ltd AS-672)
- Boreham, as a Key Service Settlement, is ranked as a suitable and sustainable location for strategic employment growth but has been excluded from further new strategic housing growth. Likely to be a misalignment between local housing and employment provision (Wates Developments Limited AS-998)
- SGS18a is contrary to the Spatial Strategy. The Chignal villages are not included in the Local Plan's Settlement Hierarchy reflecting the absence of services and infrastructure required to support growth (Chignal Parish Council AS-965)
- Higher housing growth should be identified in Danbury as a sustainable location for growth (Martin Grant Homes AS-1065)
- Policy is unsound due to reliance on a new settlement east of Chelmsford and uncertain A12 Junction 19 infrastructure, taking into account of reasonable alternatives (Dandara AS-1135, AS-1138, AS-1141, Obsidian Strategic AS-1143)
- Potential benefits of further allocations north of SWF, or smaller sites adjacent to existing higher order settlements have not been considered (Dandara AS-1138, AS-1141)
- Growth should be concentrated in North-East Chelmsford, leveraging planned infrastructure (e.g. new bypass, Beaulieu Park railway station, park-and-ride,

rather than dispersing development to smaller, less sustainable villages (Higgins Homes AS-613)

- The additional sites strategy does not identify employment opportunities to be delivered early and in parallel with housing growth (Van Diemans Property Company AS-811, The Bucknell Family AS-1129)
- Plan is too reliant on larger employment sites which may be delayed due to the current economic climate. It should recognise local employment needs including small and medium sized businesses and allocate a mix of employment sites (The Bucknell Family AS-1127)
- The proposed scale of development is unsustainable
- Vital that planned growth includes adequate road infrastructure (Chelmsford Garden Community Council AS-92)
- Reps promoting alternative/ additional sites include: Gay Bowers Limited AS-106, Kingsbury Land Promotion Limited AS-174, Taylor Wimpey Strategic Land AS-12, AS-387, Iceni AS-493, Bloor Homes (Eastern) AS-477, Essex Alms Housing AS-400, AS-401, AS-614, Higgins Homes AS-613, Obsidian Strategic Asset Management Ltd AS-672, AS-1143, Van Diemans Property Company AS-816, J & T Wardrop and the Wardrop Trust AS-1054, Mr & Mrs Thomasin - Foster & Wilkinson AS-907, AS-914, AS-943, AS-945, AS-943, Mr and Mrs B Hearn AS-617, John Hart AS-471, Gladman Developments Ltd AS-994, AS-995, AS-996, AS-997, Landvest AS-982, Wates Developments Limited AS-998, Hallam Land Management AS-992, Harris Strategic Land Limited AS-1106, Strutt and Parker (Farms) Limited AS-1122, Tritax Chelmsford Propco Ltd AS-1126, Dandara AS-1135, AS-1136, AS-1138 Barratt David Wilson AS-1068, Martin Grant Homes AS-166, AS-1062, AS-1065, The Bucknell Family AS-1129, Rosehart Properties Ltd AS-239, Vistry Group AS-405, Simon Knight AS-418, Crest Nicholson AS-480, A.G. & P.W.H Speakman AS-880, Cliffords Group Ltd AS-863, AS-870, Cliffords Group Ltd Mr Mark Peters AS-857, Mr Graham Weal AS-107, Vistry Strategic Land AS-1130, AS-1132, Richborough AS-970, Bloor Homes (Eastern) AS-973, Marriage Family AS-457, Mrs Mary Rance AS-914.

CCC Response
The Settlement Hierarchy ranks settlements according to their size, function, characteristics and sustainability. It is one of many factors used to inform where development is most sustainable and informs planning decisions so is retained. The Plan allocates a range of sites of different sizes across the settlement hierarchy.
The plan is informed by a wide range of appraisals, including the IIA and habitats assessment, and evidence base reports including an updated Infrastructure Delivery Plan, Viability Assessment, Transport Modelling, Housing Capacity in Chelmsford City Centre and Urban Area and Open Space Assessment
The Council's Infrastructure Delivery Plan (IDP) sits alongside the Local Plan. This assesses the current status of infrastructure, including healthcare, transport and water supply and treatment infrastructure, across Chelmsford and identifies what new infrastructure investment is required to support the Local Plan growth, when it is needed, and funding sources
The Council can meet its development requirements without needing to undertake a Green Belt or Green Wedge review. This approach accords with National Planning Guidance.

The site allocations along with the addition of existing permissions and windfall sites creates a good range of site sizes to assist in delivery of sites to meet housing needs over the Plan period.
The deliverability of all sites proposed for allocation have been assessed and all sites have detailed policies to address site specific considerations.
The Plan meets the level of housing and employment development as required through national policy.
The employment allocations alongside existing commitments are expected to meet the identified employment needs. The use of 'around' employment floorspace figures in specific site allocation policies allows for an appropriate degree of flexibility in provision. DM4 protects, and allows for expansion of, existing employment uses – the Plan should be read a whole, so it is not necessary to repeat in Policy S7. Policies DM8 and DM11 provide support for the growth and expansion of rural businesses – no need to add further details to Strategic Policies.
The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.

Monitoring Framework

Key statistics:

Consultation point	**Total number of responses**
Monitoring Framework	0

Summary of Representations – main issues and requested changes:

- No main issues.

Draft Policies Map

Key statistics:

Consultation point	**Total number of responses**
Legend	0
Map: SGS1dd	0
Map: SGS18a	2
Map: SGS19	2
Map: SGS7b	0
Map: SGS9a	1
Map: GS9b and GS9c	1
Map: GS14b	1
Map: SGS11c	1
Map: SGS17c, SGS17d and GS17e	0
Map: SGS20	5
Map: GS21a and GS21b	0

Summary of Representations – main issues and suggested changes:

- Map SGS9a – policy text and mapping are confusing because they do not differentiate between the original extent of the proposed allocation and the proposed enlarged area in the Additional Sites consultation (Boreham Conservation Society AS-1048)
- Map SGS17e – query on the alignment of the northern boundary of the site (Eugene Kinsella AS-346)
- The images in the maps section are blurry, meaning it was difficult to review all the information.

CCC Response
The new allocation of 14,000 m² is an expansion of the original allocation of 3,500m² and the entire allocation is therefore shown. This is the same for the expanded housing allocations at Bicknacre (SGC11c) and Ford End (GS14b).
The discrepancy between the SHELAA submission and the boundary of the site allocation is noted. Thee parcel of land excluded from the site allocation is included within a revised Defined Settlement Boundary notation, covering the complete site area as submitted to the SHELAA. The allocation policy therefore will not preclude this portion of the site being included in any future planning proposal.
Concerns about blurry maps are noted. Paper versions of the Policies Map were available to purchase and view at the Council Offices and public exhibitions during the consultation period.

Development Trajectory

Key statistics:

Consultation point	**Total number of responses**
Development Trajectory	3

Summary of Representations – main issues and suggested changes:

- Trajectory indicates delivery of some sites in the SWF WRC catchment (East Hanningfield, Rettendon Place and Woodham Ferrers) before 2030 Recommends these sites phased to complete in 2029/30 to align with the WRC growth scheme (Anglian Water Services Ltd AS-1150)
- Trajectory forecasts 1,347 dwellings from 14 sites by 2029/30, although there is insufficient clarity on delivery assumptions and timescales may be unrealistic (Martin Grant Homes AS-1064)
- Trajectory lacks robust evidence of deliverability, relies heavily on long-standing and undetermined strategic allocations, and has not been updated to reflect reduced supply (from 3,016 to 2,510 dwellings), creating a risk of short- to medium-term undersupply. Council should apply a 10% non-implementation allowance to permissions, update phasing, provide clear evidence of deliverability (particularly for strategic sites), introduce

contingency measures, and utilise all suitable sites (Obsidian Strategic Asset Management Ltd AS-673)
- Lack of consolidated development trajectory is a material omission (Taylor Wimpey Strategic Land AS-12).

CCC Response
Anglian Water's response has been used by CCC to understand and respond to matters of concern raised in this You Said We Did report and to inform any proposed minor modifications to the Local Plan.
The Housing Trajectory in the Pre-Submission Local Plan and timings within it are established through the Council's Five-Year Housing Land Supply Methodology. The Trajectory is updated annually, and the latest available Housing Site Schedule (2026) will be updated online . A number of Strategic Growth Sites rolled forward from the adopted Local Plan including greenfield sites have planning permission or resolutions to grant planning permission including North of South Woodham Ferrers, North of Broomfield and North East Chelmsford.

Appendices

This section of the consultation document contains two appendices.

Consultation point	Total number of responses
Appendix A – Glossary	1
Appendix B – Table of previous Pre-Submission (Regulation 19) Local Plan paragraph numbers	0

Summary of Representations – main issues and requested changes:

- No main issues

CCC Response
No changes

APPENDIX 1

Organisations consulted and copies of key consultation materials

List of organisations consulted 74

Statement of Representation 80

Notification letter – Example 89

Notification e-mail – Example 93

Local Plan Website Page 97

Consultation Portal – Screen Shots 100

Consultation Portal Guidance Notes 101

Paper Comments Form 107

Pop-Up Stands 116

Photos of exhibition on location 117

Exhibition Panels 118

Local Plan Video 127

Essex Chronicle Advert 128

Covering Letter and Local Plan Poster 129

Site Notices – Examples 131

Staff Email Banner and Website Banner 132

Local Plan Newsletter 133

Parish and Town Council Information Pack 137

Frequently Asked Questions 150

Communications & Marketing Campaign Report: 157

- City Times and South Woodham Focus Articles
- City Life Articles
- Examples of Social Media Posts
- GovDelivery Mailshots
- Bus Stop Adverts

Organisations consulted

Company / Organisation

1st Chelmsford Scouts
A Dunn & Son
A.R. Property Designs Ltd
Abbess, Beauchamp & Berners Roding Parish Council
Abellio Greater Anglia
Accord Energy Limited
Active Travel England
Active Workspace Ltd
Aggregate Industries UK Ltd
Aldi Stores Ltd
Alpha Garden Centre
Anchor Housing
Andrew Wing
Angel Stores
Anglia Ruskin University
Anglian Water Services Ltd
Aquila Developments ltd
Arcady Architects
Argents Nursery
Arriva The Shires and Essex
ARU
Ashton KCJ (128030-1003)
ASP
Atkins Telecom
Avison Young
Aviva
Baddow Hall Junior School
BAE Systems
Bakers Lane Action Group
Bang & Olufsen
Barnes Farm Infant School
Barnes Farm Junior School
Barnston Parish Council
Barratt David Wilson
Basildon & Brentwood CCG
Basildon Borough Council
BBC Essex
BDP
BDW Eastern Counties
Beaulieu Residents
Becket Keys C of E Secondary School
Bellway Homes Ltd
Bennetts BMW Specialists
Berkeley Strategic
Bernard Le Claire and Osiris Trustees Ltd
Bidwells
Billericay Town Council
Birkett Hall Homes Ltd
Bishops Primary School
Black Notley Parish Council
Blackmore, Hook End & Wyatts Green Parish Council
Bloor Homes (Eastern)
Blue Strip
Blythewood Properties
Bolton Farms
Boreham Bowling Club
Boreham Conservation Society
Boreham Parish Council
Boreham Primary School
Bovis Homes Ltd
Boxford (Suffolk) Holdings Ltd
Boyer Planning
Bradwell Power Generation Company Ltd
Braintree District Council
Bramling Developments Ltd
Brentwood and Chelmsford Green Party
Brentwood Borough Council
Bressole Limited
Bridgewater Property Group Limited
Broadfield Homes Ltd
Broomfield Parish Council
Broomfield Parish Council, Chignal Parish Council, Great Waltham Parish Council, Little Waltham Parish Council, Writtle Parish Council and Newlands Spring Residents Association
Broomfield Primary School
Broxbourne Council
Brumfelda - Broomfield's Local History Group
BT National Notice Handling Centre
BT Openreach, Southend ATE
Builders First Source
Building Research Establishment
C J H Farming Ltd
CAAG
Cadent Gas
Campaign for Real Ale Limited
Campaign for the Protection of Rural Essex
CAODS (Chelmsford Amateur Operatics Society)
Capital & Counties (Financial Services) Ltd
Carter Jonas
Castle Point & Rochford CCG
Castle Point Council
Cell Energy Limited
Centrica Barry/ Generation/ KL/ PB/ RPS LTD
CERA (Chignal Estate Residents Association
Chancellor Park Primary School
Channels Residents Community Group
Charterhouse Property Group & Charterhouse Strategic Land
Chelmer & Blackwater Navigation Co Ltd
Chelmer Cycles
Chelmer Cycling Club
Chelmer Housing Partnership
Chelmer Residents Forum
Chelmer Valley High School
Chelmer Valley Landscape Group
Chelmer Village Parish Council
Chelmsford & Central Essex RSPB Local Group
Chelmsford and District Model Railway Club
Chelmsford Biodiversity Forum
Chelmsford Business Board
Chelmsford Canoe Club
Chelmsford Cathedral
Chelmsford City Centre Retailers Group
Chelmsford City Football Club
Chelmsford Civic Society
Chelmsford College
Chelmsford Community Church
Chelmsford Community Transport Limited
Chelmsford Commuters & Rail Travellers
Chelmsford County High School for Girls
Chelmsford CVS
Chelmsford Cycle Action Group
Chelmsford Diocese Board of Finance
Chelmsford Garden Community Consortium
Chelmsford Garden Community Council
Chelmsford Gospel Hall Trust
Chelmsford Hindu Society
Chelmsford Labour Party
Chelmsford Liberal Democrats
Chelmsford Mencap
Chelmsford Rivers and Canal Link group (CRACL)
Chelmsford Rugby Football Club
Chelmsford Social Club

Chelmsford Star Co-operative Society Ltd
Chelmsford Taxi Association Limited
Chelmsford Theatre Workshop
CHESS
Chignal Estate Residents Association
Chignal Parish Council
CHP
CHP Customer Review Panel
Chris Marten Architectural Services
Christian Care
Christian Growth Centre Chelmsford
Church of Our Lady Immaculate
Churchill Living and McCarthy Stone
Clark Partnership
Clearview Relocation Ltd
Cliffords Group Ltd
Coal Pension Properties Ltd
CODE Development Planners Ltd
Cogent Land
Colchester City Council
Cold Norton Parish Council
Collingwood Primary
Columbus School & College
Commercial Estates Group
Confederation of Passenger Transport UK
Connexions & Careers Chelmsford
Cool Heat Services
Corona Energy Retail 4 Ltd
Countryside Properties (UK) Ltd
CPRE Essex
Craintern Ltd
Crest Nicholson
Crest Strategic Projects Ltd
Crondon Park Golf & Country Club
Crouch Vale Brewery Ltd
Croudace Homes
Crown Energy Ltd
Culture Chelmsford
Cycling UK
D Chennells Ltd
D.W.S Bodyworks Ltd
Danbury Developments Ltd
Danbury Mission
Danbury Parish Council
Danbury Park Community Primary School
Danbury Society
Dandara
Daniel James Developments
Data Energy Management Services Ltd
David E Partridge
Defence Infrastructure Organisation
Department for Business and Trade
Department for Education
Department for Energy Security and Net Zero
Department for Science, Innovation and Technology
Department for Transport (DfT)
Design Council
detoxpeople ltd
DevAssist
Diageo Pension Trust Fund
Diocese of Chelmsford
Dominvs Group
Downes Planning Partnership
Downham CE (VC) Primary School
DTI
DWS Bodyworks
E.ON UK Plc
E2V Technologies
East Anglia GREEN
East Hanningfield C E Primary School
East Hanningfield Parish Council
East Hanningfield Parish Plan Committee
East Herts District Council
East of England Ambulance Service NHS Trust
East of England Health Protection Team
East Thames Housing
Eastlight Homes
Ecotricity
EDF Energy
Education & Skills Funding Agency
Edward Gittins Associates
EE
Elim Christian Centre
Elm Green Preparatory School
Elmwood Primary School
Endurance Estates
Energy Environment and Sustainability Group
English Rural Housing Association
ENI UK Ltd
Environment Agency
Environmental Dimension Partnership (EDP)
Epping Forest District Council
esperance energies
Essex & Suffolk Water
Essex Alms Housing
Essex ARG
Essex Association of Local Councils
Essex Audi Automotive Group
Essex Bridleways Association
Essex Chamber of Commerce
Essex Chronicle
Essex County Council
Essex County Fire & Rescue Service
Essex Herts Air Ambulance Trust
Essex Housing
Essex Islamic Trust
Essex Local Access Forum
Essex Local Nature Partnership
Essex Muslim Centre
Essex Police
Essex Police Fire and Crime Commissioner
Essex Record Office
Essex Respite and Care Association
Essex Squash & Racketball Association
Essex Waterways Ltd
Essex Wildlife Trust
ESTAMA
Estuary Housing Association
Evolution Town Planning
Exolum Pipeline System Ltd
Eyott Sailing Club
Falcon Bowling and Social Club
Farleigh Hospice
Felsted Parish Council
First Essex Buses Ltd
Flagship Housing Group Ltd
Flaternity Residents association
Flitch Green Parish Council
Football Association
Ford End C of E Primary School
Ford End Village Design Statement Committee
Ford End Village Hall
Forestry Commission England
Foster Partnership Farms
Foxley Group Ltd
Friends, Families and Travellers and Traveller Law Reform Project
Galleywood Equestrian Centre
Galleywood Infant School
Galleywood Parish Council
Gateway 120, Cirrus Land LLP, and L & Q Homes

Gay Bowers Limited
GB Partnerships
Gearston Ltd
Great Baddow High School
Gladman Developments Ltd
Gleeson Land
GMD Solutions
Going Places Leisure Travel Ltd
Good Easter Parish Council
Good Easter Village Hall
Graham Care Group
Granville Developments
Gray & Sons Ltd / Boxford Group Ltd
Great & Little Leighs Parish Council
Great Baddow Beehive Lane County Primary School
Great Baddow High School
Great Baddow Lawn Tennis Club
Great Baddow Parish Council
Great Baddow St Mary
Great Leighs Holdings & Estates Limited
Great Notley Parish Council
Great Waltham C of E (VC) Primary School
Great Waltham Parish Council
Greater London Authority
Greenfields Community Housing Ltd
Greenwood Estates Ltd
Greenwoods Hotel and Spa Group
Greystoke CB
H M Prison Service
H R Philpot & Sons
Hallam Land Management
Halley Development
Halliday West Surveyors
Hamilton & Pavilion Trustees Ltd (Chelmsford Meadows Unit Trust)
Hamilton Bentley & Partners
Hammonds Estates
Hanson Aggregates Ltd & Threadneedle Pensions Ltd
Harlow District Council
Harris Strategic Land Limited
Hastoe Housing Association
Hatfield Peverel Parish Council
Havering London Borough
Hawridge Land
Heads 2 Minds
Health and Safety Executive
Heart of Essex Local Enterprise Partnership
Heathcote School
Hedingham and Chambers
Help The Aged
Heritage Writtle
Hertfordshire and West Essex ICB
Hertfordshire County Council
Herts Property Investments Limited
HEVF Self Storage UK Limited
Higgins Group
High Chelmer
High Easter Parish Council
High Ongar Parish Council
Highgate Capital Limited
Highways England
Highwood County Primary School
Highwood Parish Council
Highwood Village
Hill Farm (Chelmsford) Ltd
Hill Residential Ltd
Historic England
Home Builders Federation
Homes England
Hopkins Homes Ltd
House Of Commons
Housebuilders Consortium
Howe Green Community Association
Hullbridge Parish Council
Hybrid Planning & Development
Hylands Construction Company Ltd
Hylands School
IBA Planning Ltd
Iceland Foods Ltd
Iceni Projects
Ideas Hub
Independence Project
Indigo Planning
Ingatestone & Fryerning Parish Council
Ingatestone Village Design Statement
Ingleton Wood (Billericay)
Inland Homes
Inspired Villages
Intergen
J & A Lyon
J & T Wardrop and the Wardrop Trust
J Group and Landvest
J Matthews Trust
Jacobs UK Ltd
James Development Ltd
JCN Associates Ltd
Jewell Developments Ltd
JLL
JWF Hughes Mid-Essex Gravel + MJ Peters
Keeble Brothers
Kensington and Edinburgh Estates
King Edward Grammar School
Kings Hardware Ltd
Kings Road Primary School
Kings Road/North Avenue Community Action Group
Kingsbury Land Promotion Limited
KLW Planning
KM Consulting
Knight Developments Ltd
L Q Group
Landgage Heritage
Landscape Planning Group Ltd
Landvest & Harding Homes
Landvest Developments Ltd
Langford and Ulting Parish Council
Larkrise Primary School
Larmar Engineering
Latimer Homes
Lawford Mead Primary & Nursery School
Lawns Action Group
Lewis & Scott Retirement Living
Life Education Trust
Little Baddow History Centre
Little Baddow Parish Council
Little Baddow Society
Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group
Little Darwins Nursery
Little Dunmow Parish Council
Little Waltham C E V A Primary School
Little Waltham Parish Council
Lodge Coaches
London & Cambridge Properties Limited
London Borough of Barking and Dagenham
London Borough of Enfield
London Borough of Redbridge
London Borough of Waltham Forest
London Gypsies and Travellers Unit
Longfield Solar Farm
Lower Thames Crossing
LVJ Maldon Limited

M Farnsworth Ltd
M Scott Properties Ltd
mabbplanning
Maldon District Council
Maltese Road Primary School
Marconi Plaza Residents Association
Marden Homes Ltd
Margaret Roding Parish Council
Margaretting CE (VC) Primary School
Margaretting Parish Council
Marine Management Organisation
Martin Grant Homes
Mashbury Parish
McDonald's Restaurants
Meadgate Primary School
Meadows Shopping Centre
Medical Services Danbury Ltd
Melville Dunbar Associates
Messrs Tom and James Hirst
MHCLG
Michael Howard Homes
Mid and South Essex Integrated Care Board (ICB)
Mid Essex Gravel Pits (Chelmsford) Ltd
Mid-Essex Business Group
Mildmay Infant & Nursery School
Miscoe Enterprises Ltd
MJT Securities Limited
Moat Homes
Mobile Broadband Network Limited
Mobile UK
Montagu Evans
Moody Homes Ltd
Moulsham Hall Estates
Moulsham High School
Moulsham Infant School
Moulsham Junior School
Moulsham Mill Partnership
Mountnessing Village Council
Mr Colin Chambers
Mr Spencer Firth
Mr/Ms Bolingbroke, Ms Foster, Mr & Mrs McKay, Mr & Mrs Nicol
N Clark Welding & Fabrication
National Energy System Operator NESO
National Federation of Gypsy Liaison Groups
National Gas Transmission System
National Grid Electricity Distribution
National Grid Electricity Transmission
National Grid Ventures (NGV)
National Highways
National Trust
Natural England
Neos Networks
Network Rail
New Hall Properties (Eastern) Ltd
New Hall School
Newell Properties Development Ltd
Newlands Spring Primary School Academy Trust
Nexus Planning
NGB Essex Angling
NGB Essex Athletics
NGB Essex Basketball
NGB Essex Bowls
NGB Essex Cricket
NGB Essex Cycling
NGB Essex Fencing
NGB Essex Football
NGB Essex Gymnastics
NGB Essex Hockey
NGB Essex Lacrosse
NGB Essex Movement and Dance
NGB Essex Orienteering
NGB Essex Rowing
NGB Essex Rugby Union
NGB Essex Sailing
NGB Essex Squash
NGB Essex Triathlon
NGB Essex Volleyball
NHS Improvement Team
NHS North East London
NHS Property Services Ltd
NHS South East and South West Essex
NHS Suffolk and North East Essex ICB
NIBS Buses
NJBHLP
North Central London CCG
North Chelmsford Villages Community Group
North Essex Partnership NHS Foundation Trust
North Fambridge Parish Council
North West Parishes Group
Northern Trust
Oaklands Infants School
Obsidian Strategic
Office for Health Improvement and Disparities
Office of Rail Regulation
Omtech Services Limited
Rettendon Site Leaseholders Association
Opus Little Waltham Developments Ltd
Our Lady Immaculate R C Primary School
Paper Mill Lock Cruises Ltd
Park View Group Ltd
Parkway and Town Centre Neighbourhood Action Panel
Parkwood Academy
Pegasus Group
Pembridge Land Group
Perryfields County Infants School
Perryfields Junior School
Persimmon Homes
Pigeon (Sandon) Ltd
PKC Retail Ltd
Place Services Historic Environment Team
Planware Ltd
Pleshey Parish Council
Premier Homes
Princes Rd Allotment Association
Priory Primary School
Privo Land Limited
PRS
Ptarmigan Land Ltd
Purleigh Parish Council
R Kemball
Ramblers Essex Area
Ramsden Bellhouse Parish Council
Ramsden Crays Parish Council
Ravenscraig Close Ltd
Rawreth Parish Council
Rayleigh Town Council
Rayne Parish Council
RCCE
Redrow Homes
Rentplus (Agents Tetlow King Planning)
Reprohouse Limited
Resting Places Limited
Retail Focus
Rettendon Common Residents Association
Rettendon Parish Council
Rettendon Primary School
Richborough Estates
River Crouch Conservation Trust
Road Haulage Association
Robert Brett & Sons Ltd

Robert Dewar Associates
Rochford District Council
Roka Nixy Ltd
Rosehart Properties Limited
Ross & James Fenwick
Roxwell CoE (VC) Primary School
Roxwell Parish Council
Royal Mail Group
Royal Society For Protection of Birds
RSPCA
Rubicon West Plc
Rugby Football Union
Runwell Parish Council
Rural Community Council of Essex
RVL Properties Ltd
RWH Properties Limited
S A Mynard Limited
S B Papineni
S J R Farming
Sainsbury's Supermarkets Ltd
Sandon Parish Council
Sandon School
Sanis Motors
Save Sandford Mill Campaign
Saville Foley LLP
Saxtons 4x4
School Lane Land
Scott Brownrigg
Scottish & Southern Energy Pipelines
Seax Development
Sedum Ltd
Sempra Homes Ltd.
Shirley Smith & Co
Shotgate Parish Council
SJT Developments Ltd
Sky Telecommunication Services Ltd
Smithbrights Butchers
Smiths Environmental Products Ltd
South East LEP
South Hanningfield Parish Council
South Woodham Action Group
South Woodham Ferrers Health & Social Care Group
South Woodham Ferrers Residents Party
South Woodham Ferrers Town Council
Southend Borough Council
Southern Electric
SP PowerSystems
Speakman Brothers
Sport England
Springboard Housing Association Ltd
Springfield Parish Council
Springfield Park Baptist Church
Springfield Primary School
St Anne's Preparatory School
St Augustine's Catholic Church
St Cedd's School
St John Payne Catholic School
St John's C of E Primary School
St Joseph's Catholic Primary School
St Mary's CE Primary School
St Mary's Church Great Baddow
St Peters Primary School
St Pius X Catholic Primary School
St. Michael's Junior School
Standard Life Investments
Stanfords
Stephenson's of Essex Ltd
Stevens VW Dismantlers
Stock CE Primary School
Stock Parish Council
Stonebond Properties Ltd
Stow Maries Parish Council
Strettons
Strutt and Parker (Farms) Limited
Stubbings Investment Holdings Limited
Suffolk County Council
Swan Housing Association
Swifts Local Network: Swifts & Planning Group
Talyor Wimpey East London
Tan Stand Tanning Centre
Tarmac
Taylor Wimpey
Telereal Securitised Property GP Limited
Tendring District Council
Terling and Fairstead Parish Council
Thames & Newcastle
The Alternative Accommodation Agency Ltd
The Beaulieu Park School
The Boswells School
The Bucknell Family
The Bungalow Nursery
The Cathedral School
The Chelmsford Ballet Company
The Chelmsford Labour Party
The Chelmsford Society
The Danbury Society
The Essex Badger Protection Group
The Fulbourne Trust
The Howgego Trust
The Inland Waterways Association
The John Bishop Partnership
The JTS Partnership
The Land Trust
The Landscape Conservation Trust
The National Federation of Gypsy Liaison Groups
The Newspaper Society
The North East Chelmsford Garden Village Consortium
The Planning Bureau
The Royal Horticultural Society
The Sandon School
The Showmen's Guild of Great Britain
The Tyrells Primary School
The Wilderness Foundation UK
The Woodland Trust
The Writtle Surgery
Theatres Trust
This Land
Thomas Dixon Developments Ltd
Thorogood Family & B Green
Threadneedle Pensions Ltd
Three
Thrift Farm Ltd
Thriftwood School
Thurrock Borough Council
Timpsons
Total Energies Gas and Power Services UK Ltd
Toveglen Ltd
Transition Chelmsford
Transport East
Transport for London
Traveller Law Reform Project
Travelling Showmans Guild
Trinity Road Primary School
Trinity St Mary's CE (VA) Primary School
Tritton Farming Partnership LLP
Trustees of M E Mossman
Trustees of the Fulbournes Settlement
Tyrrells School
UK Power Networks
Urban Provincial
Uttlesford District Council
V. J. Adams
Van Diemans Property Company

Village Hall Committee
Virgin Media Services
Vistry Group
Vitol Gas Ltd
Vodafone and O2
W & H Marriage & Sons Ltd
Wardrop & Co Ltd
Warren Farm Ltd & Warren Farm Trading Partnership LLP
Warwick Court Property Company
Waterhouse Farm Residents Association
Wates Developments Limited
WEA Sec
Weal Properties Ltd
Welbeck Strategic Land V Limited
Welsted Joinery Ltd
West Hanningfield Parish Council
West Register (Realisations) Ltd
Westlands County Primary School
Whirledge & Nott
WHLMC
Wickford Town Council
Widford Lodge Preparatory School
Wilkinson Planning Ltd
William de Ferrers School
Willingale Parish Council
Wilson Construction Ltd
Windsor Road Trading Estate
WM Morrison Supermarket Plc
Womens Institute
Woodham Ferrers & Bicknacre Parish Council
Woodham Infrastructure Group
Woodham Mortimer with Hazeleigh Parish Council
Woodham Walter Parish Council
Woodland Trust
Woodville Primary School
Writtle Infant School
Writtle Junior School
Writtle Neighbourhood Plan Group
Writtle Parish Council
Writtle Surgery
Writtle University College
Writtle VDS
YMCA

REVIEW OF THE LOCAL PLAN
FOCUSED CONSULTATION ADDITIONAL SITES (REGULATION 19) STATEMENT OF REPRESENTATION PROCEDURE AND STATEMENT ON AVAILABILITY OF PROPOSED SUBMISSION DOCUMENTS FOR INSPECTION

Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) - Regulations 7, 19, 20 and 35

Chelmsford City Council is inviting your comments on the following documents:

- Chelmsford Local Plan – Focused Consultation Additional Sites (Regulation 19) Document
- Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum.

The City Council is publishing the Chelmsford Local Plan – Focused Consultation Additional Sites (Regulation 19) Document for consultation from 20 November 2025 to 8 January 2026. It is accompanied by the Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum. This is in accordance with Regulations 19 and 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The Local Plan shapes future growth and development across the whole of Chelmsford City Council's area. It sets out a positive vision, identifies where and how new development should take place in the future as well as areas for protection. It includes strategic policies, site allocation policies, development management policies and a Policies Map for determining all forms of planning applications. We adopted our current Local Plan in May 2020. We need to review the plan at least every five years to make sure it remains up to date and meets the changing needs for development growth to 2041.

The Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum comprises a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), Habitats Regulations Assessment (HRA), Health Impact Assessment (HIA) and Equality Impact Assessment (EqIA).

This note has nine parts:

- PART 1 – Background
- PART 2 – What is a Regulation 19 Consultation
- PART 3 – Legal Compliance and Duty to Co-operate
- PART 4 – Soundness
- PART 5 – Where can I view the consultation documents?
- PART 6 – How can I comment?
- PART 7 – Appearing at Independent Examination
- PART 8 – What will happen with my representation?
- PART 9 – Statement on availability of proposed submission documents for inspection

The consultation period runs from 10am on 20 November 2025 until 4pm on 8 January 2026
Comments received before or after this time cannot be accepted.

PART 1 – Background

The Council carried out a consultation on the full Pre-Submission Local Plan in February to March 2025. This was also a Regulation 19 consultation. Following the conclusion of this consultation, several significant events have taken place:

- Three strategic sites in the Pre-Submission Local Plan, which were expected to contribute to housing delivery in the next five years, have either stalled or have been significantly delayed
- The reassessment and re-profiling of the Council's housing land supply (August 2025) shows that other development sites will not be built as quickly as originally envisaged in the next five years
- As the adopted Local Plan became more than five years old on 27 May 2025 the housing need figure is out of date which means for decision making on current planning applications the Council does not have 5 years of deliverable housing supply
- The Government announced the cancellation of the A12 Development Consent Order (DCO) widening scheme.

In response to the significant events above, the Council has identified additional site allocations for inclusion within the review of the Local Plan to improve the 5 Year Housing Land Supply (5YHLS) position to ensure that it can be found "sound" at examination. It will also allow time to assess the implications of the cancellation of the A12 DCO widening scheme and to continue discussions with National Highways and Homes England regarding a funding solution.

This is a focused consultation which seeks representations on additional site allocations for inclusion within the review of the Local Plan to ensure that sufficient land is identified. The additional sites comprise 11 new housing sites, three expanded housing sites and one expanded employment site. The additional sites development trajectories and key consequential plan changes arising from the additional sites allocation policies are also subject to consultation alongside an Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum which assesses the changes.

The consultation will be undertaken in accordance with Regulation 19 of the Local Plan Regulations and the Council's Statement of Community Involvement.

PART 2 – What is a Regulation 19 Consultation

As a Local Planning Authority, the Council must publish the version of the Local Plan that it intends to submit to the Planning Inspectorate for Independent Examination. This allows for representations to be made which can be considered at Independent Examination. This is known as the publication stage, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended www.legislation.gov.uk/uksi/2012/767/contents.

For Chelmsford, this is the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document (the 'Plan') and aspects of the plan contained within the Focused Consultation Additional Sites (Regulation 19) Document.

Following this consultation the Council will submit both the Pre-Submission version of the Local Plan published for consultation in February to March 2025 and this focused consultation document for examination by an independent Planning Inspector. Representations submitted to both consultations will also be submitted in full. **There is no need to resubmit representations submitted as part of the previous Pre-Submission (Regulation 19) Local Plan consultation.**

If the Pre-Submission Local Plan and the Additional Sites (including the key consequential plan changes) contained within this focused consultation are accepted by the Planning Inspector, they will be incorporated together in a single new Local Plan before being finalised for adoption.

The Planning Inspector undertaking the Independent Examination will assess whether the Local Plan has been prepared in line with the relevant legal requirements (including the duty to co-operate) and whether it is 'sound'.

PART 3 – Legal Compliance and Duty to Co-operate

You should consider the following before making a representation on legal compliance:

- The Plan should be included in the Council's current Local Development Scheme (LDS) and the key stages set out in the LDS should have been followed. The LDS is effectively a programme of work prepared by the Council, setting out the plans it proposes to produce. It will set out the key stages in the production of any Plans which the Local Planning Authority proposes to bring forward for Independent Examination. If the Plan is not in the current LDS it should not have been published for representations. The Council's LDS is available to view on its website at: https://www.chelmsford.gov.uk/media/ehzd1alh/chelmsford-local-development-scheme-2025-2028.pdf
- The process of community involvement for the Plan in question should be in general accordance with the Council's Statement of Community Involvement (SCI). The SCI sets out the Council's strategy for involving the community in the preparation and revision of plans and the consideration of planning applications. The Council's SCI is available to view on the Council's website at: www.chelmsford.gov.uk/sci
- The Council is required to provide a Sustainability Appraisal (SA) report when it publishes a Plan. This should identify the process by which the SA has been carried out, and the baseline information used to inform the process and the outcomes of that process. The SA is a tool for assessing the extent to which the Plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The SA for this Plan is included within the published Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum.
- The Plan should comply with all other relevant requirements of the Planning and Compulsory Purchase Act (PCPA) and the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.

You should consider the following before making a representation on compliance with the duty to co-operate:

- Section 33A of the PCPA requires the Council to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the Plan. The Council's Additional Site - Duty to Co-operate Position Statement (November 2025) provides an update on the activities undertaken by Chelmsford City Council (CCC) in respect to the Duty to Co-operate on the Review of the adopted Chelmsford Local Plan, and is available to view on the Council's website at: https://www.chelmsford.gov.uk/media/etkjneup/dtc005-additional-sites-duty-to-cooperate-position-statement-november-2025.pdf
- Non-compliance with the duty to co-operate cannot be rectified after the submission of the plan. Therefore, the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector cannot recommend adoption of the Plan.

There is no need to resubmit representations submitted as part of the previous Pre-Submission (Regulation 19) Local Plan consultation.

PART 4 – Soundness

A Local Planning Authority should submit a Plan for Independent Examination which it considers to be "sound". The tests of soundness are set out in the National Planning Policy Framework (NPPF). Plans are sound if they are:

Positively prepared – providing a strategy which, as a minimum seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

Effective – deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF. Please note that in accordance with paragraph 234 of the 2024 NPPF, for the purpose of preparing local plans this Plan will be examined under the 2023 NPPF.

Representations at this stage should focus on whether the aspects of the plan contained within the Additional Sites Focused Consultation meet the tests listed above. This is because these are the broad areas that the Inspector will focus on in examining the Local Plan.

If you think the content of the Focused Consultation Additional Sites (Regulation 19) Document is not sound because it does not include a policy on a particular issue, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy?
- Is the issue with which you are concerned already covered by another policy in the Local Plan?
- If the policy is not covered elsewhere, in what way is the Local Plan unsound without the policy?
- If the Local Plan is unsound without the policy, what should the policy say?

There is no need to resubmit representations submitted as part of the previous Pre-Submission (Regulation 19) Local Plan consultation.

PART 5 - Where can I view the consultation documents?

You can read the consultation documents in the following ways:

- On the Council's Planning Policy Consultation Portal at www.chelmsford.gov.uk/planningpolicyconsult. This system also allows you to submit comments to the consultations
- On the Council's website alongside the Local Plan evidence base documents at www.chelmsford.gov.uk/lp-review
- At the Chelmsford City Council Customer Service Centre, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford CM1 1JE (10am to 4pm Monday to Friday).

At the following drop-in public exhibitions. These will provide an opportunity to meet an officer face-to-face unless otherwise stated.

Location	Date	Time
Council Chamber, Civic Centre, Duke Street, Chelmsford, CM1 1JE	Thursday 11 December Friday 12 December Saturday 13 December	6pm - 8pm 1pm - 3pm 10am - 12noon
High Chelmer Shopping Centre, Exchange Way, Chelmsford, CM1 1XB	Monday 1 December to Monday 8 December	Unstaffed exhibition panels displayed all-day during shopping centre opening hours
South Woodham Ferrers Town Council, Champions Manor Hall, Hullbridge Road, South Woodham Ferrers, CM3 5LJ	Thursday 4 December to Tuesday 9 December	Unstaffed exhibition panels displayed 9am - 4pm weekdays, Saturday 9am – 3:30pm, Sunday closed

Please check our website www.chelmsford.gov.uk/lp-review for any updates before making your journey.

If you are unable to access the documents on a computer, you can request paper copies by emailing planning.policy@chelmsford.gov.uk, telephoning (01245) 606330 or by writing to Spatial Planning Services, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE. A charge will be made to cover printing and postage costs.

PART 6 - How can I comment?

You can comment on the consultation documents in the following ways:

Online Planning Policy Consultation Portal:
Go to: www.chelmsford.gov.uk/planningpolicyconsult where you can:

- Read the consultation documents
- Make your comments via the specially designed representation form
- Sign up for alerts to feedback reports and future consultations

This is our preferred means of receiving comments as it ensures that your comments are recorded accurately and are processed quickly.

It also allows you to edit comments before submitting them, save a draft and return to your form later, and to upload any supporting material. Please **save** your comments as you complete the form using the 'Save as Draft' button at the bottom of the form as the system will timeout after 30 minutes.

You can view, download, and comment on all the consultations via the online Planning Policy Consultation Portal: www.chelmsford.gov.uk/planningpolicyconsult

If you have not already registered, registration is simple using the easy to follow steps in our User Guide: www.chelmsford.gov.uk/lp-portal-guide. These guidance notes include more information on the Planning Policy Consultation Portal, including what to do if you have forgotten your password, and how to make your comments. If you have followed the user guide and have any further questions or are having difficulties using the Planning Policy Consultation Portal please contact us at planning.policy@chelmsford.gov.uk or call 01245 606330 during normal office hours and one of the team can assist you.

Please note you will need to add your comments through the representation form for each section, policy, site, map, or appendix you wish to comment on. Full guidance on how to make your comments are included within our User Guide: www.chelmsford.gov.uk/lp-portal-guide

The events on the Planning Policy Consultation Portal are as follows:
1. Local Plan Focused Consultation Additional Sites (Regulation 19) Questionnaire 2025 – Here you can read the Chelmsford Local Plan – Focused Consultation Additional Sites (Regulation 19) Document as a pdf and then make comments on individual sections/policies/sites/maps/appendices by selecting from the drop down list. You will need to complete this representation form multiple times if you wish to make comments on multiple parts of the document. Each time you complete it you must select from the drop down list which section/policy/site/map/appendix of the document your comments relate to.
2. Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum 2025 – Here you can read the Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum (IIA) as a pdf and then make comments on individual paragraphs/figures/tables of the document. You will need to complete this representation form multiple times if you wish to make comments on multiple parts of the IIA. Each time you complete it you must state which paragraph/figure/tables etc of the IIA Addendum your comments relate to.

Representations are invited for a period of seven weeks, up to 4pm on 8 January 2026. Comments received outside of this period will not be accepted. The Council is unable to make exceptions or allowances for postal delays or external problems with electronic communications. So please try to reply well ahead of the final deadline.

There is no need to resubmit representations submitted as part of the previous Pre-Submission (Regulation 19) Local Plan consultation.

For all the above events please remember to save your comments as you go.

In writing:
If you prefer to send comments in writing, please fill in the relevant specially designed representation form.

We will then record your comments on the Planning Policy Consultation Portal, to make sure they are dealt with alongside the online comments.

The Local Plan representation form covers the Chelmsford Local Plan – Focused Consultation Additional Sites (Regulation 19) Document and the Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum consultations.

The Local Plan representation form can be downloaded at www.chelmsford.gov.uk/lp-review. Paper copies of the representation form are also available from Chelmsford City Council's Customer Service Centre, Civic Centre, Duke Street, Chelmsford, CM1 1JE (10am to 4pm Monday to Friday). Paper copies can also be made available on request by telephoning (01245) 606330 or emailing planning.policy@chelmsford.gov.uk

Forms can be returned:

- By e-mail to planning.policy@chelmsford.gov.uk
- By post to Planning Policy, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE
- By hand to Chelmsford City Council Customer Service Centre (details above).

The use of the Local Plan representation form is strongly recommended as this will ensure that comments are related to the matters relevant to the subsequent Independent Examination by a Planning Inspector.

If you wish to submit a representation on more than one issue in the Local Plan, please complete a Local Plan representation form continuation sheet as provided for each issue.

If you have difficulties making representations by e-mail or post due to a disability, please call 01245 606330. Documents can be made available in alternative format including large print, audio and other languages. Please call (01245) 606330, or email planning.policy@chelmsford.gov.uk

Please do not submit multiple copies of the same response (e.g. online and email, or online and hardcopy).
There is no need to resubmit representations submitted as part of the previous Pre-Submission (Regulation 19) Local Plan consultation.

General advice on making representations on the Chelmsford Local Plan – Focused Consultation Additional Sites (Regulation 19) Document:

If you wish to make a representation seeking a modification to the Chelmsford Local Plan – Focused Consultation Additional Sites (Regulation 19) Document (the 'Plan') or part of the Plan you should set out clearly in what way you consider the Plan or part of the Plan is legally non-compliant or unsound, having regard to the soundness criteria set out above in Part 4. Your representation should be supported by evidence wherever possible. It will be helpful if you also say succinctly and precisely how you think the plan should be modified.

You should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification. If you are submitting a representation of significant length, please provide a summary of not more than 200 words. We will request a summary in appropriate circumstances if it is not originally provided. You should not assume that you will have a further opportunity to make submissions. Any further submissions after the Plan has been submitted for Independent Examination may only be made if invited by the Inspector, based on the matters and issues they identify.

There is no need to resubmit representations submitted as part of the previous Pre-Submission (Regulation 19) Local Plan consultation.

The Planning Inspectorate advise that where groups or individuals share a common view on the plan, it would be very helpful if they would make a single representation which represents that view, rather than a large number of separate representations repeating the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

If you are organising a petition or intend to, or have signed one, it must be submitted by 4pm on 8 January 2026 and be accompanied by the name and contact details for the petition organiser. The Council will register the petition organiser on the Planning Policy Consultation Portal. Acknowledgement of the petition and any future Local Plan notifications will only be sent to the petition organiser. Petitions should include the names and addresses of all who support the petition. The number of signatories will be recorded and attributed to relevant representations, but names, addresses and signatures themselves will not be published.

Please consider carefully how you would like your representation to be dealt with in the Independent Examination: whether you are content to rely on your written representation, or whether you wish to take part in hearing session(s). Please remember only representors who are seeking a change to the Plan can be heard at the hearing session(s), and it is the Planning Inspector's decision on who will participate and be heard at the Independent Examination. In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the Independent Examination process.

Representations about the Chelmsford Local Plan – Focused Consultation Additional Sites (Regulation 19) Document (the 'Plan') may be accompanied by a request to be notified at a specified address of any of the following:

i. The submission of the Plan to the Secretary of State Secretary of State for Levelling Up, Housing and Communities for Independent Examination
ii. Publication of the Planning Inspector's Report on the Plan
iii. Adoption of the Local Plan 2022- 2041.

These requests can be made by completing the relevant section of the Local Plan representation form.

If you are uploading additional supporting documents, please ensure they contain no signatures, e-mail addresses or personal postal addresses.

Please note we are unable to accept anonymous representations. It is a requirement of the Local Plan process that comments can only be deemed legitimate ("duly made") if they are received in a written format with a name and address supplied. Comments made verbally, anonymously, or outside of the consultation period cannot be accepted.

Section 149 of the Equality Act 2010 requires that the Council should avoid any form of discrimination and foster good relations between different ethnic groups. Comments which are deemed to be discriminatory, racist, inflammatory or derogatory, or include information which comprises personal or sensitive information e.g. health information, details about a criminal record, or religious beliefs, will not be accepted. We would ask that you avoid the use of such comments when making your representations.

PART 7 - Appearing at Independent Examination

The Local Plan representation form asks whether you consider it necessary to take part and speak at the Independent Examination hearing if your representation is seeking a modification to the Chelmsford Local Plan – Focused Consultation Additional Sites (Regulation 19) Document (the 'Plan'). Please remember it is the Planning Inspector's decision on who will participate and be heard at the Independent Examination. It is acceptable to submit just a written submission if you feel this adequately covers all your points as all the representations will be submitted to the Planning Inspector and considered as part of the Independent Examination.

If you made a request to take part and speak at the Independent Examination hearing as part of your previous Pre-Submission (Regulation 19) Local Plan consultation response this request will be submitted to the Planning Inspector. There is no need to resubmit representations submitted as part of the previous Pre-Submission (Regulation 19) Local Plan consultation.

PART 8 - What will happen with my representation?

For all consultation events the Council will acknowledge receipt of all duly received representations, although the Council will not enter into individual correspondence. All representations will be recorded and published on the Planning Policy Consultation Portal at www.chelmsford.gov.uk/planningpolicyconsult

Comments will be published with the respondent's name, organisation and agent (where applicable). No other personal details will be made public. Data will be held in accordance with the Data Protection Act 1998 and the General Data Protection Regulations. For more information please visit the Council's Privacy Policy web page: www.chelmsford.gov.uk/your-council/about-our-website/privacy-policy-and-notices/privacy-policy/

A copy of all duly made representation(s) to the Chelmsford Local Plan – Focused Consultation Additional Sites (Regulation 19) Document and Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector). These representations will be 'made available' in line with the Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20, 22 and 35). This includes publication on the Council's Planning Policy Consultation Portal.

Feedback reports to the previous Pre-Submission (Regulation 19) Local Plan consultation and the accompanying Integrated Impact Assessment have been published. Following this consultation, further feedback reports will be produced setting out the main issues raised to the Focused Consultation Additional Sites documents.

PART 9 – Statement on availability of proposed submission documents for inspection

The following documents are defined in Regulation 17 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) as the "proposed submission documents":

i. Chelmsford Local Plan – Focused Consultation Additional Sites (Regulation 19) Document and its Policies and Map
ii. Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum
iii. Chelmsford Local Plan – Pre-Submission (Regulation 19) Document and its Policies Map
iv. Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment
v. Issues and Options You Said We Did Feedback Report
vi. Preferred Options You Said We Did Feedback Report
vii. Pre-Submission (Regulation 19) Feedback Report.

These documents are available for inspection in line with Part 5.

In addition to these proposed submission documents, a number of supporting evidence base documents are published to view on our website at www.chelmsford.gov.uk/lp-review

Directorate for Sustainable Communities
Spatial Planning Services

Spatial Planning Services
Civic Centre, Duke Street, Chelmsford,
Essex CM1 1JE

Consultation PID Number:
Username:

20 November 2025

Dear Consultee

New Consultation Events –

- **Chelmsford Local Plan - Focused Consultation Additional Sites (Regulation 19) Document**
- **Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum**

I am writing to you as you as a registered consultee on Chelmsford City Council's Planning Policy consultation database. Your PID number and username are at the top right-hand side of this letter.

Please be advised that the City Council is publishing the above documents for consultation for seven weeks from: 10am on Thursday 20 November 2025 to 4pm on Thursday 8 January 2026**.**

Local Plan

What is the adopted Local Plan and why are we reviewing it?
The Local Plan shapes future growth and development across Chelmsford City Council's area. It sets out a positive vision, identifies where and how new development should take place in the future as well as areas for protection. We adopted our current Local Plan in May 2020. We need to review the plan at least every five years to make sure it remains up to date and meets the changing needs for development growth to 2041. The Government revised the National Planning Policy Framework (NPPF) in December 2024 but our Local Plan is able to continue under transitional arrangements meaning it will be examined against the previous December 2023 NPPF.

What are we consulting on?
Following on from previous consultations in 2022 and 2024 the Council carried out consultation on the full Pre-Submission Local Plan in Spring 2025. Following the conclusion of this consultation, it has emerged that more land for homes and employment uses need to be added into the plan to ensure that sufficient development land is identified.

In response, the Council will carry out a focused consultation on additional housing and employment sites and related plan changes.

We are consulting on the:

- Chelmsford Local Plan – Focused Consultation Additional Sites (Regulation 19) Document
- Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum.

Following this consultation the Council will submit both the Pre-Submission version of the Local Plan published for consultation in February to March 2025 and this focused consultation document for examination by an independent Planning Inspector. Representations submitted to both consultations will also be submitted in full. **There is no need to resubmit representations submitted as part of the previous Pre-Submission (Regulation 19) Local Plan consultation.**

What is the Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum?

The Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum assesses the sustainability, health, and equality performance of the Plan.

How do I get involved?

To ensure that comments are submitted in a format required by the Planning Inspector, it is important that you identify whether you support or object to the Focused Consultation Additional Sites (Regulation 19) Document, whether the Council has met the legal requirements, including the Duty to Co-operate and whether it meets the tests of soundness set out in the national policy (National Planning Policy Framework). Plans are sound if they are:

- **Positively prepared** – provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common grounds; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

There is no need to resubmit representations submitted as part of the previous Pre-Submission (Regulation 19) Local Plan consultation.

We prefer receiving comments online, using our specially designed Local Plan Consultation Portal. Using the Local Plan Consultation Portal helps us to record your comments accurately and process them quickly. Go to www.chelmsford.gov.uk/planningpolicyconsult to:

- Read the consultation documents
- Make your comments
- Sign up for alerts to future consultations.

Otherwise, representations should be made on a specially designed response form available online at www.chelmsford.gov.uk/lp-review or a paper copy can be provided by phoning (01245) 606330. **The use of the standard representation form is strongly recommended as this will ensure that comments are related to the matters relevant to the subsequent examination by a Planning Inspector.**

Responses can also be made by email and in writing.

See the enclosed Statement of Representation Procedure and Statement on Availability of Proposed Submission Document for full details about what the documents cover and how to make your comments.

More information

- Read our enclosed newsletter, which summaries the consultation
- Meet with planning staff face-to-face at a public drop-in exhibition (see the enclosed Statement of Representation Procedure and Statement on Availability of Proposed Submission Documents)
- Visit our website for further information such as the frequently asked questions www.chelmsford.gov.uk/lp-review
- Email us at planning.policy@chelmsford.gov.uk or call 01245 606330.

Next Steps

Following this consultation the Council will submit both the Pre-Submission version of the Local Plan published for consultation in February to March 2025 and this focused consultation document, alongside the evidence supporting the Local Plan, for examination by an independent Planning Inspector. Representations submitted to both consultations will also be submitted in full. **There is no need to resubmit representations submitted as part of the previous Pre-Submission (Regulation 19) Local Plan consultation.**

The Council will produce a summary of the main issues raised in the consultation responses for the Planning Inspector and publish this online.

All duly-made comments will be published on the Council's Consultation Portal in accordance with the Data Protection Act and General Data Protection Regulations. To be duly made, you need to provide your name and address with your comment. Anonymous comments will not be accepted.

Your name, your comments and any information provided, including supporting documents, will be available for public inspection and published online. We will not publish any personal details.

Section 149 of the Equality Act 2010 requires that the Council should avoid any form of discrimination and foster good relations between different ethnic groups. Comments which are deemed to be discriminatory, racist, inflammatory or derogatory, or include information which comprises personal or sensitive information e.g. health information, details about a criminal record, or religious beliefs, will be considered as inadmissible and will not be accepted. We would ask that you avoid the use of such comments when making your representations.

Further general information on the Local Plan can be found on the Council's website at https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-local-plan/

Please note:

- **Comments should only be made to the Focused Consultation Additional Sites (Regulation 19) Document and its accompanying IIA. There is no need to resubmit representations submitted as part of the previous Pre-Submission (Regulation 19) Local Plan consultation**
- **We are unable to accept anonymous representations**
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- **Individual acknowledgement of receipt will not be possible**.

Updating your details

If you no longer wish to remain on our Planning Policy consultation database or if your contact details have changed, please contact us on 01245 606330.

You may prefer to submit/manage/view your comments online through the Planning Policy consultation database. We will then keep you informed of progress of the Local Plan by email, and you can easily view and comment on consultations. It's simple to transfer to the online system - please call us on 01245 606330.

Yours faithfully

Jeremy Potter

Spatial Planning Services Manager

Notification E-mail - Example

Consultation PID Number: «Person_ID»
Username:

Dear Consultee

New Consultation Events –

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How do I get involved?
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See the Statement of Representation Procedure and Statement on Availability of Proposed Submission Document, available at http://www.chelmsford.gov.uk/as-sor, for full details about what the documents cover and how to make your comments.

More information

- Read our newsletter, available at http://www.chelmsford.gov.uk/as-newsletter, which summaries the consultation

- Meet with planning staff face-to-face at a public drop-in exhibition (see the Statement of Representation Procedure and Statement on Availability of Proposed Submission Documents, available at http://www.chelmsford.gov.uk/as-sor, for details)
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Yours faithfully

Jeremy Potter

Spatial Planning Services Manager

Local Plan Review

We are reviewing our adopted Local Plan. We are running a focused consultation on proposals to add more sites to our draft Local Plan.

We are inviting comments on these proposed additional sites which we have set out in our Focused Consultation Additional Sites (Regulation 19) Document.

The consultation period closes at 4pm on Thursday 8 January 2026.

If you made comments to the third stage of consultation, called the Pre-Submission Local Plan, in February/ March 2025 you do not need to submit them again.

About the consultation

We consulted on a full Pre-Submission Local Plan in February/March 2025, to meet our needs for development growth until 2041. Since then, it has emerged that we need

to add more land for homes and employment use into the plan to meet future needs. This is because some sites in the adopted Local Plan have not come forward and some sites will not be built as quickly as expected.

Added to this, the government has greatly increased its calculation of housing need in Chelmsford.

These two factors combined mean that we do not have enough allocated housing sites to meet these needs, especially for the first five years of the plan.

We are consulting on 11 additional housing sites and expanded allocations for three housing sites and one employment site. We also propose some focused changes to the relevant policies.

These additional sites would be located in settlements that:

- are accessible to the local highway network
- are near to services and facilities such as schools and local shops
- accord with the Plan's Spatial Strategy

We have updated our Integrated Impact Assessment (IIA) to consider the new sites and related policy changes. We are also inviting comments on the IIA as part of the consultation.

Consultation documents

You can read the consultation documents. These documents are large in size. You may find it easier to download and view these documents on a desktop computer, rather than on a smartphone or tablet.

Focused Consultation Additional Sites (Regulation 19) Document

Integrated Impact Assessment Focused Additional Sites Addendum

Have your say

Find out more

What happens next

Supporting documents

Pre-Submission stage consultation documents

Evidence Base: Pre-submission

Other useful information

Local Plan review stages

Integrated Impact Assessment

Call for Sites and SHELAA

Using the consultation portal

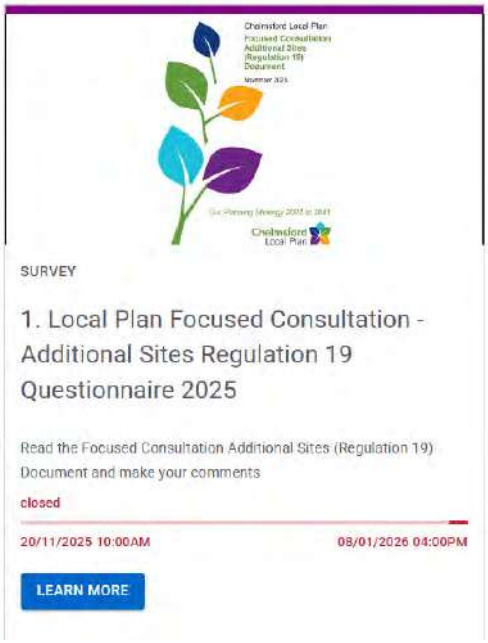
Local Development Scheme

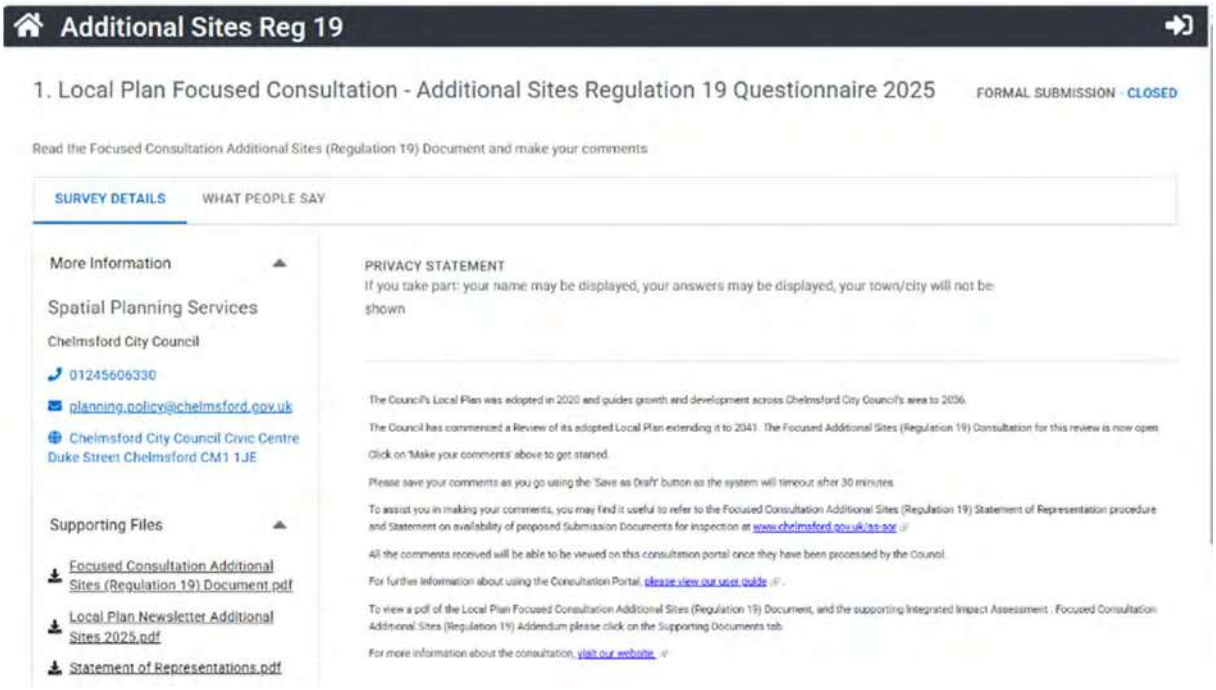
Duty to Co-operate

Consultation Portal - Screen Shots









CONSULTATION PORTAL GUIDANCE NOTES

Online Consultation Portal:

Go to: www.chelmsford.gov.uk/planningpolicyconsult where you can:

- Read the consultation documents
- Make your comments
- Sign up for alerts to feedback reports and future consultations

This is our preferred means of receiving comments as it ensures that your comments are recorded accurately and are processed quickly.

You can view, download, and comment on all current consultations on the online Consultation Portal. It also allows you to edit comments before submitting them, save a draft and return to your form later, and to upload any supporting material.

Before making your comments, you may find it useful to refer to the **Review of the Local Plan Focused Consultation Additional Sites (Regulation 19) Statement of Representation Procedure and Statement on Availability of Proposed Submission Documents for Inspection** www.chelmsford.gov.uk/as-sor

If you require assistance, please contact us:
Telephone – 01245 606330 during normal office hours (08.45am to 4.45pm Monday to Thursday; 08.45am to 4.00pm Friday)
Email – planning.policy@chelmsford.gov.uk

For further information about the Local Plan please visit
www.chelmsford.gov.uk/lp-review

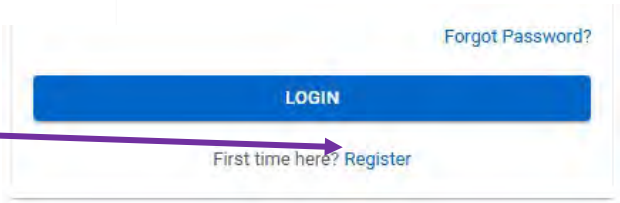
The consultation period runs from 10am on 20 November 2025 until 4pm on 8 January 2026.
Comments received before or after this time cannot be accepted.

How to register

If you have not already registered, registration is simple using the easy-to-follow steps. Find the Consultation Portal at:
www.chelmsford.gov.uk/planningpolicyconsult



- open the Consultation Portal
- click on Login/Register button



- click on Register

A registration screen will open.
You then need to read the terms and conditions, and the privacy policy, and tick the boxes. Then you can:

- create a username
- choose a password (this should be as secure as possible, and include a mix of numbers and letters)

You should only register as an 'Agent' if you are representing someone else in a professional capacity, such as a developer or a client.

When you have added your information, click REGISTER. We will send you an email with a link, inviting you to activate your account.

- click the link in the e-mail
- click on your name (top right of the Consultation Home screen)
- click on My Details to complete your information.

It is important that you fill in your postal address, so that we have an alternative means of contacting you.

Forgotten login details?

If you have already signed up but forgotten your login details, you should not register again, as this will create a duplicate record. Instead:

- go to the Consultation Portal
- click on Sign in button
- click the 'Forgot Password?' link to reset your password

If you are still experiencing problems, you can contact the Planning Policy Helpline on 01245 606330.

How to read the consultation documents and make a comment

Open the Consultation Portal at: www.chelmsford.gov.uk/planningpolicyconsult

Choose the consultation that you are interested in.

We are consulting on the following.

1. Focused Consultation Additional Sites (Regulation 19) Document – this is the main consultation document. We are proposing to include 11 new housing sites, three expanded housing sites and one expanded employment site within the review of the Local Plan. The revised development trajectory and key consequential plan changes arising from the additional sites allocation policies are also subject to consultation. We need you to consider whether the Focused Consultation Additional Sites Document is legally compliant and consistent with national policy, and answer specific consultation questions on this.

2. Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum – We have updated our Integrated Impact Assessment (IIA) to consider the additional sites and other policy changes. This IIA Addendum assesses sustainability and strategic environmental impacts, Habitats Regulations, and health and equality impacts of the proposals and is published for consultation alongside the Additional Sites Document.

1. Focused Consultation Additional Sites (Regulation 19) Document - How to make a comment

Go to the consultation you are interested in and select the ‘Learn More’ button:



The consultation document and the supporting documents are listed on the left side.
Please read the documents before making your comments.

When you are ready to make your comments,
click on the ‘Make your comments’ button.

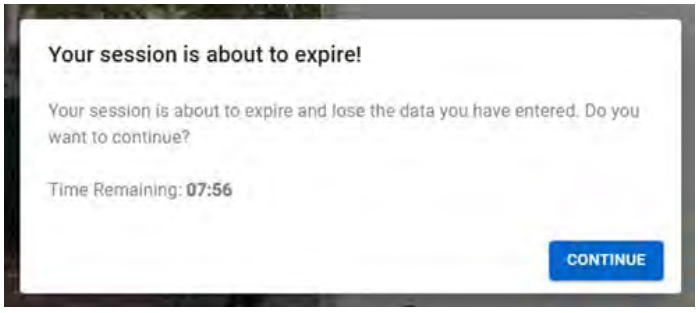


You may also find it useful to refer to the Review of the Local Plan Focused Consultation Additional Sites (Regulation 19) Statement of Representation Procedure and Statement on Availability of Proposed Submission Documents for Inspection www.chelmsford.gov.uk/as-sor.

Please note you will need to add your comments through a new comment form for each section, policy, site, or map you wish to comment on.

Please **save** your comments as you complete the form using the ‘Save as Draft’ button at the bottom of the form as the system will timeout after 30 minutes.

You will get a reminder 10 minutes before the system times out. You will need to select ‘Continue’, and then make sure that you ‘Save as Draft’.



When you have completed the comments form, do not forget to select ‘Submit’.

2. Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum - How to make a comment

Go to the consultation you are interested in and select the ‘Learn More’ button:



The consultation document and the supporting documents are listed on the left side.
Please read the documents before making your comments.

When you are ready to make your comments, click on the ‘Make your comments’ button.

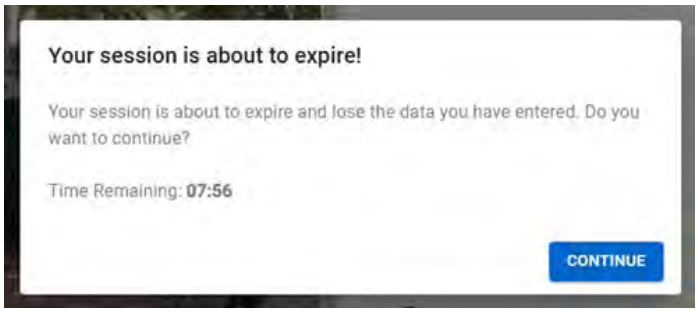


Please read the document before making your responses. You may also find it useful to refer to the Review of the Local Plan Focused Consultation Additional Sites (Regulation 19) Statement of Representation Procedure and Statement on Availability of Proposed Submission Documents for Inspection www.chelmsford.gov.uk/as-sor.

Please note you will need to add your comments through a new comment form for each paragraph, table, figure, or appendix you wish to comment on.

Please **save** your comments as you complete the form using the ‘Save as Draft’ button at the bottom of the form as the system will timeout after 30 minutes.

You will get a reminder 10 minutes before the system times out. You will need to select ‘Continue’, and then make sure that you ‘Save as Draft’.



When you have completed the comments form, do not forget to select ‘Submit’.

Important notes:

If you made comments to the third stage of consultation, called the Pre-Submission Local Plan, in February/ March 2025 you do not need to submit them again.

If you are submitting a representation of significant length, please provide a summary of not more than 200 words. We will request a summary in appropriate circumstances if it is not originally provided.

When uploading supporting documents, please ensure they contain no signatures, e-mail addresses or personal postal addresses.

To be duly made, you need to provide your name and address with your comment. **Anonymous comments will not be accepted.**

Comments will be published with the respondent's name, organisation and agent (where applicable). No other personal details will be made public. This includes publication on the Council's Consultation Portal. Data will be held in accordance with the Data Protection Act 1998 and the General Data Protection Regulations. For more information please visit the Council's Privacy Policy web page: www.chelmsford.gov.uk/your-council/about-ourwebsite/privacy-policy-and-notices/privacy-policy/

Section 149 of the Equality Act 2010 requires the Council to avoid any form of discrimination and also foster good relations between different ethnic groups. We will not display, share or consider any comments that are inappropriate, including those that are racist, inflammatory or derogatory. Comments which contain personal or sensitive information e.g. health information, details about a criminal record, or religious beliefs, will not be accepted.

Petitions:

If you are organising a petition or intend to, or have signed one, it must be submitted by 4.00pm on 8 January 2025 and be accompanied by the name and contact details for the petition organiser. The Council will register the petition organiser on the Consultation Portal and the number of signatories will be assigned to that comment/s, but names and addresses of all signatories will not be published. Acknowledgement of the petition and any future Local Plan notifications will be sent to the petition organiser.

Helpline:

If you require assistance please call 01245 606330 during normal office hours (08.45am to 4.45pm Monday to Thursday; 08.45am to 4.00pm Friday) or email planning.policy@chelmsford.gov.uk

Focused Consultation on:

Additional Sites (Regulation 19) Document

PAPER COMMENTS FORM

This form has Four Parts:

- Part A - Consultation Details
- Part B - Your Contact Details
- Part C - Your Comments on the Focused Consultation Additional Sites (Regulation 19) Document
- Part D - Your Comments on the Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum

Part A - Consultation Details

Chelmsford City Council has published the Focused Consultation Additional Sites (Regulation 19) Document and accompanying Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum for consultation in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.

How to comment

The Council strongly encourages comments to be made via its online Consultation Portal www.chelmsford.gov.uk/planningpolicyconsult as this enables the quick and efficient handling of comments. This system allows you to edit comments before submitting them and to upload any supporting material.

For further information about how the Consultation Portal works, read our User Guide at: www.chelmsford.gov.uk/lp-portal-guide
Alternatively, comments can be made using this representation form and returned by:

- Email - planning.policy@chelmsford.gov.uk
- Post - Spatial Planning Services, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE
- Hand - Chelmsford City Council Customer Service Centre, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, Monday to Friday 10am-4pm.

You can answer as few or as many questions as you like.

Please note we are unable to accept anonymous representations. Any comments received after 4.00pm on Thursday 8 January 2026 cannot be accepted.

How your comments will be used

To be duly made, you need to provide your name and address with your comment. Anonymous comments will not be accepted. At this stage of Local Plan preparation, comments should focus on legal compliance and the soundness of the Local Plan. This is the information required by the Planning Inspectorate who will independently examine the Local Plan and consider any unresolved objections.

Comments will be published with the respondent's name, organisation and agent (where applicable). No other personal details will be made public. Data will be held in accordance with the Data Protection Act 1998 and the General Data Protection Regulations. For more information please visit the Council's Privacy Policy web page: www.chelmsford.gov.uk/your-council/about-our-website/privacy-policy-and-notices/privacy-policy/

A copy of all duly made representation(s) to the Focused Consultation Additional Sites (Regulation 19) Document and accompanying Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector). These representations will be 'made available' in line with the Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20, 22 and 35). This includes publication on the Council's Consultation Portal.

Section 149 of the Equality Act 2010 requires the Council to avoid any form of discrimination and also foster good relations between different ethnic groups. We will not display, share or consider any comments that are inappropriate, including those that are racist, inflammatory or derogatory. Comments which contain personal or sensitive information e.g. health information, details about a criminal record, or religious beliefs, will not be accepted.

Comments must be received by 4.00pm on 8 January 2026

Part B - Your Contact Details

Personal Details

Title: .....

First Name: .....

Last Name: .....

Organisation (if the comments you are making are on behalf of an organisation)

.....

Address: .....

.....

.....

.....

Postcode: .....

Telephone Number: .....

Email Address:

.....

Consultation ID (if known): .....

Signature: .....

Date: .....

Agent Details (if applicable)

Title: .....

First Name: .....

Last Name: .....

Organisation (if the comments you are making are on behalf of an organisation)

.....

Address: .....

.....

.....

.....

Postcode: .....

Telephone Number: .....

Email Address:

.....

Consultation ID (if known): .....

Signature: .....

Date: .....

Comments must be received by 4.00pm on 8 January 2026

Part C - Your Comments on the Focused Consultation Additional Sites (Regulation 19) Document

Please read the document before making your responses. This is available via the Consultation Portal www.chelmsford.gov.uk/planningpolicyconsult or on our website at www.chelmsford.gov.uk/lp-review.

To assist you in completing this form you may find it useful to refer to the Focused Consultation Additional Sites (Regulation 19) Statement of Representation Procedure and Statement on Availability of Proposed Submission Documents available at www.chelmsford.gov.uk/as-sor (referred to in this form as the Statement of Representation).

ESSENTIAL INFORMATION

Please select the section of the consultation document your comment relates to. If you wish to make comments to multiple sections/policies/sites/maps of the document please complete one form per section/policy/site/map:

Section 1

Please choose the sub-section from the list below:	Please tick
Purpose of this document	☐
Why are we undertaking a Focused Consultation on Additional Sites?	☐
What are the implications of having a Local Plan more than five years old and a lack of Five-Year Housing Land Supply?	☐
What are the implications of the cancellation of the A12 DCO widening scheme?	☐
What is the 5YHLS position with the Additional Sites?	☐
What has happened to the previous Pre-Submission Local Plan consultation responses?	☐
What is the scope of the Focused Consultation Additional Sites (Regulation 19) Document?	☐
How have the Additional Sites been selected?	☐
Where are the Additional Sites located?	☐
How can I have my say?	☐
What else are we consulting on?	☐
Why are we not consulting on other changes to the Pre-Submission Local Plan?	☐
What happens next?	☐
What evidence have we used?	☐
What is the timetable for the Local Plan review?	☐

Section 2 - Additional Site Allocation Policies

Please choose the site from the list below:

Site 1dd – Land at Former Kay Metzeler Premises, Brook Street	☐
Site 18a – Land North West of Chelmsford (North of Hollow Lane)	☐
Site 19 – Land West of Patching Hall Lane	☐

	Please tick
Site 7b – Great Leighs – Land East of London Road	☐
Site 9a – Waltham Road Employment Area, Boreham	☐
Site 9b – Land to the East of 118 to 124 Plantation Road, Boreham	☐
Site 9c – South of Main Road and Dukes Wood Close, Boreham	☐
Site 14b – Land South of Ford End Primary School	☐
Site 11c – Land West of Barbrook Way, Bicknacre	☐
Site 17c – Land South of Rough Hill Complex, The Tye, East Hanningfield	☐
Site 17d – Land South and South East of East Hanningfield Village	☐
Site 17e – Land South of Windmill Farm, Back Lane, East Hanningfield	☐
Site 20 – Land to East and North of Rettendon Place	☐
Site 21a – Land North of Old Rectory Lodge, Main Road, Woodham Ferrers	☐
Site 21b – Land North of Congregational Church, Main Road, Woodham Ferrers	☐

Section 3 - Key consequential changes

Please choose the sub-section from the list below:

Strategic Policy S6 – Housing and Employment Requirements	☐
Strategic Policy S7 – The Spatial Strategy	☐
Monitoring Framework	☐
Draft Policies Map SGS1dd	☐
Draft Policies Map SGS18a	☐
Draft Policies Map SGS19	☐
Draft Policies Map SGS7b	☐
Draft Policies Map SGS9a	☐
Draft Policies Map GS9b and GS9c	☐
Draft Policies Map GS14b	☐
Draft Policies Map SGS11c	☐
Draft Policies Map SGS17c, SGS17d and GS17e	☐
Draft Policies Map SGS20	☐
Draft Policies Map GS21a and GS21b	☐

Section 4 - Development Trajectory (Additional Sites Housing Site Schedule) ☐

Appendices

Please choose the appendix from the list below:

A – Glossary	☐
B – Table of previous Pre-Submission (Regulation 19) Local Plan paragraph numbers	☐

Question 1:

Do you consider the Local Plan legally compliant in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012?

For the definition of 'legally compliant', please refer to the **Statement of Representation.**

Yes ☐ No ☐

Question 1a:

Please provide an explanation below. Please provide precisely and succinctly all the evidence and supporting information necessary to support your representation:

Question 1b:

Please set out below the modifications you consider necessary to make the Local Plan legally compliant including revised wording of any policy or text. Please provide precisely and succinctly all the evidence and supporting information necessary to support your representation:

Question 2:

Does the Local Plan comply with the Duty to Co-operate?

For information on the term 'Duty to Co-operate', please refer to the **Statement of Representation.**

Yes ☐ No ☐

Question 2a:

Please provide an explanation below:

Question 2b:
Please set out below any changes to the approach taken which you consider necessary to ensure the Duty to Co-operate is met. Please include revised wording of any policy or text to the Local Plan. Please be as precise and succinct as possible:

Question 3:
Do you consider the Local Plan to be 'sound'? To be found 'Sound' a Local Plan should be positively prepared, justified, effective and consistent with National Policy.

For more information on the term 'Soundness', please refer to the **Statement of Representation.**

Yes ☐ No ☐

Question 3a:
If No, because you consider the Local Plan is NOT:

☐ Positively prepared ☐ Justified

☐ Effective ☐ Consistent with national policy

Question 3b:
Please provide an explanation below and identify the main issues:

Question 3c:
Please set out below the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text. Please be as precise and succinct as possible:

Question 4:

It is the Planning Inspector's decision who will participate and be heard at the Independent Examination. In considering this question, please note that written and oral representations carry the same weight and will be given equal consideration in the examination process.

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

If your representation is seeking a change, do you consider it necessary to take part and speak at the Independent Examination hearing?

Yes ☐ No ☐

Question 4a:

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Question 5: Executive Summary

If you are submitting a representation of significant length, please provide a summary of the main issues in your representation in no more than 200 words. We will request a summary in appropriate circumstances if it is not originally provided.

Please provide an executive summary of the main issues below:

Question 6:

Do you wish to be notified of the following:

Please note if you do not select any boxes, you will not be notified at the following stages of Local Plan preparation.

☐ Submission of the Local Plan for Examination

☐ Publication of the Inspector's Report

☐ Adoption of the Local Plan

Attachments:

If you wish to submit any supporting information, please ensure it contains no signatures, e-mail addresses or personal postal addresses. If you need additional space, please continue on a separate sheet.

Comments must be received by 4.00pm on 8 January 2026

Part D - Your comments on the Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum

Please read the document before making your responses. This is available via the Consultation Portal www.chelmsford.gov.uk/planningpolicyconsult or on our website at www.chelmsford.gov.uk/lp-review.

We would welcome your views on any aspect of the IIA Addendum. In particular, we would like to hear your views as to whether the effects which are predicted are likely and whether there are any significant effects which have not been considered.

ESSENTIAL INFORMATION:

Please state clearly which paragraph/table/figure/appendix of the IIA your comment relates to. Without this your comment cannot be considered.

Question 1:

Do you agree with this paragraph/table/figure/appendix?

Yes ☐ No ☐

Question 2:

Please provide an explanation below:

Question 3:

Have we missed anything? Where possible please support your answer with reference to any evidence.

Comments must be received by 4.00pm on 8 January 2026

Question 4: Executive Summary

If you are submitting a representation of significant length, please provide a summary of the main issues in your representation in no more than 200 words. We will request a summary in appropriate circumstances if it is not originally provided.

Please provide an executive summary of the main issues below:

Attachments:

If you wish to submit any supporting information, please ensure it contains no signatures, e-mail addresses or personal postal addresses. If you need additional space, please continue on a separate sheet.

Further Information:

This paper comments form can be made available in alternative formats including large print, audio and other languages.

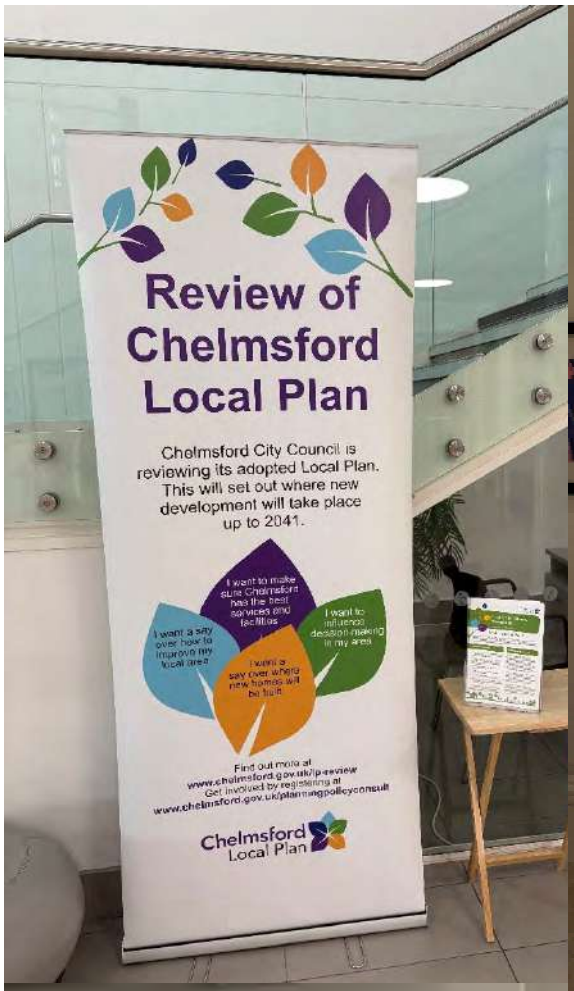
If you require assistance please call 01245 606330 during normal office hours (08.45am to 4.45pm Monday to Thursday; 08.45am to 4.00pm Friday) or email planning.policy@chelmsford.gov.uk.

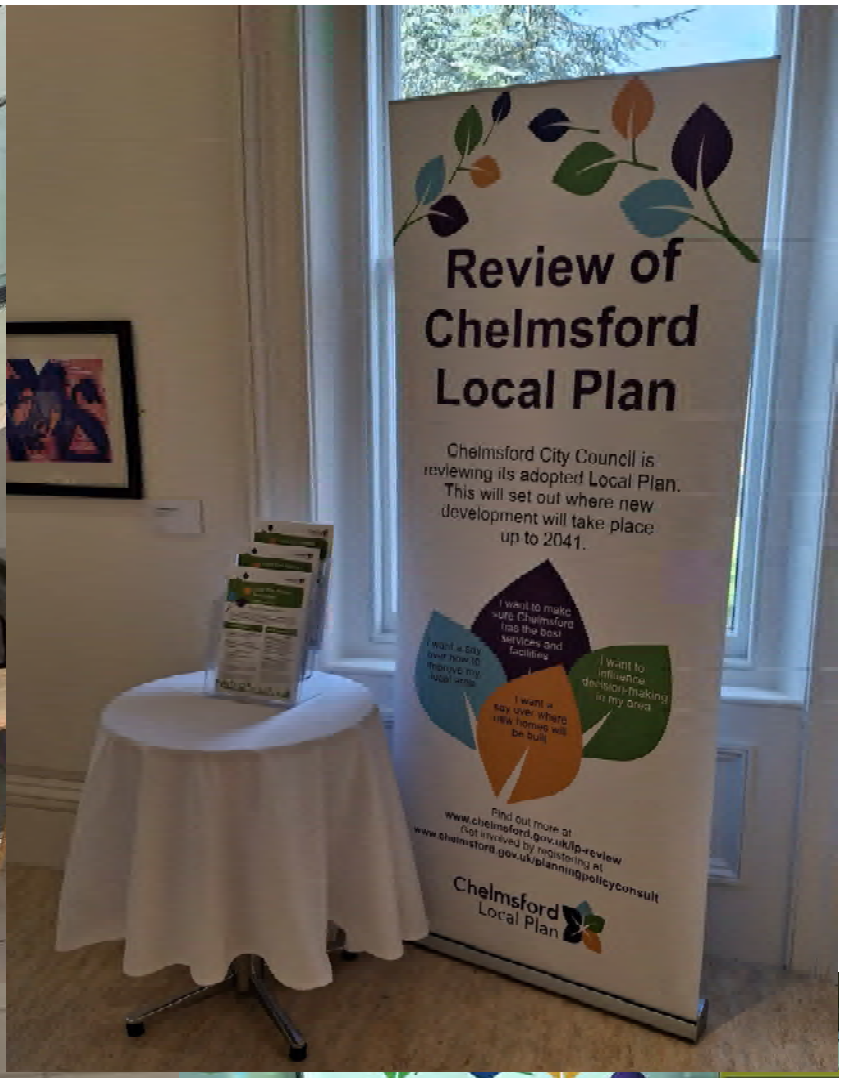
The Council will acknowledge receipt of your comments, although we will not enter into individual correspondence.

Thank you for being part of the consultation.

Comments must be received by 4.00pm on 8 January 2026

Pop-Up Stands









Photos of Exhibition on location

Council Chamber



High Chelmer Shopping Centre



Welcome

Thank you for visiting today

What is the Local Plan

Chelmsford City Council's Local Plan sets out a positive vision, addressing how much new development is needed and identifies land for housing, schools, shops and jobs, as well as land uses that will be protected. The current plan was adopted in 2020, and we need to review it at least every five years to ensure it keeps up to date.

What has changed?

In February/March 2025, we consulted on a full Pre-Submission Local Plan to meet our needs for development growth until 2041.

Changes to that plan are needed in light of several factors outside the City Council's control that have affected future housebuilding. These include:

- The Government cancelling the A12 widening scheme
- Three key sites having stalled or been significantly delayed
- Other developers slowing down their build rates
- The Government's increased housing target having to be met through the plan (a change since May 2025).

That means we do not have enough allocated housing sites to meet our needs, particularly for the first five years of the plan.

What we are proposing

We are proposing to:

- Add 11 new housing sites
- Expand the proposed allocations for three housing sites
- Add a further 10,500sqm of employment space to a proposed employment site.

This will provide a total of 1,592 additional homes over the plan period to 2041, and help meet the latest housing needs figure of 1,210 new homes a year.

We have selected the additional sites following detailed testing of site constraints and opportunities in relation to matters like flood risk, heritage, traffic and archaeology. They are located in settlements which are accessible to the local highway network and services and facilities and accord with the plan's Spatial Strategy. The schools in these areas can accommodate the additional growth or are proposed for extension.



+



= **New Local Plan**

Chelmsford Local Plan

Focused Consultation

Focused Consultation Document

This exhibition is a summary of the Focused Consultation Additional Sites (Regulation 19) Document. Before making any comments, you are advised to read the full document at **www.chelmsford.gov.uk/lp-review**

We are continuing our approach in the adopted Local Plan and the Pre-Submission Local Plan that we consulted on in February/March 2025 by focusing additional housing and employment growth to the most sustainable locations in three Growth Areas.

You can comment on any of the additional site allocations. **We will not be able to accept any comments on parts of the Pre-Submission Local Plan that have not changed.**

In addition, we will also be consulting on some key consequential changes to Strategic Policy S6 – Housing and Employment Requirements, and Strategic Policy S7 – The Spatial Strategy, along with minor changes to the monitoring framework, trajectories for the delivery of the additional sites, and a small number of changes to the Policies Map to show the additional sites.

Previous consultation

First stage: Issues and Options – August to October 2022

Second stage: Preferred Options – May to June 2024

Third stage: Pre-Submission – February to March 2025

If you made comments to the third stage of consultation in February / March 2025, you do not need to submit them again

We have published feedback reports setting out a review of the consultation activity, and a summary of the representations we received. The Issues and Options and Preferred Options feedback reports also include information on how we used these comments when preparing the later stages of the document for consultation.

You can read the feedback reports at **www.chelmsford.gov.uk/lp-review**

All the comments received can also be viewed on the Council's planning policy consultation portal at **www.chelmsford.gov.uk/planningpolicyconsult**

Chelmsford Local Plan

How have we selected the additional sites?

Our Evidence Base

We have undertaken a significant amount of research to help inform the selection of the additional sites. This research forms part of our Evidence Base, and includes specially commissioned studies on particular topics where more information was helpful. The following list sets out some of the new or updated Evidence Base documents:

- Review of the Air Quality Impact Assessment
- Landscape Sensitivity and Capacity Study
- Detailed Water Cycle Study Addendum
- Highways Impact Junction Modelling
- New/updated Heritage Impact Assessments
- Updated Strategic Housing and Employment Land Availability Assessment (SHELAA)
- Archaeological Impact Assessment
- Level 2 Strategic Flood Risk Assessment Addendum and site summary tables and mapping
- Sequential and Exception Testing Update
- Defined Settlement Boundary/Urban Area Boundary Technical Note
- Housing Scenario Tests for Early Years, Childcare, Primary and Secondary Education
- Additional Sites housing site studies.

This evidence, alongside all the key documents/studies used to the inform the Local Plan review to date, can be viewed on our website at: **www.chelmsford.gov.uk/lp-review**

Selecting the additional sites has involved a number of stages including:

- Assessing sites promoted for development
- Identifying sites in the most sustainable settlements
- Considering the additional sites Integrated Impact Assessment
- Housing site studies looking at access, topography, neighbouring land uses and other physical constraints
- Technical testing including for education, wastewater, archaeology, heritage, and landscape sensitivity and capacity (see above).

Rejected sites have been excluded or rejected for reasons including:

- Land not promoted by a developer or landowner, as it cannot be considered available within the plan period
- Land not considered capable of being delivered over the next 5 years
- Land with clear barriers to development such as heritage or landscape designation, or lack of services such as primary school capacity
- Sites located in the Green Belt and Green Wedge.

Chelmsford Local Plan

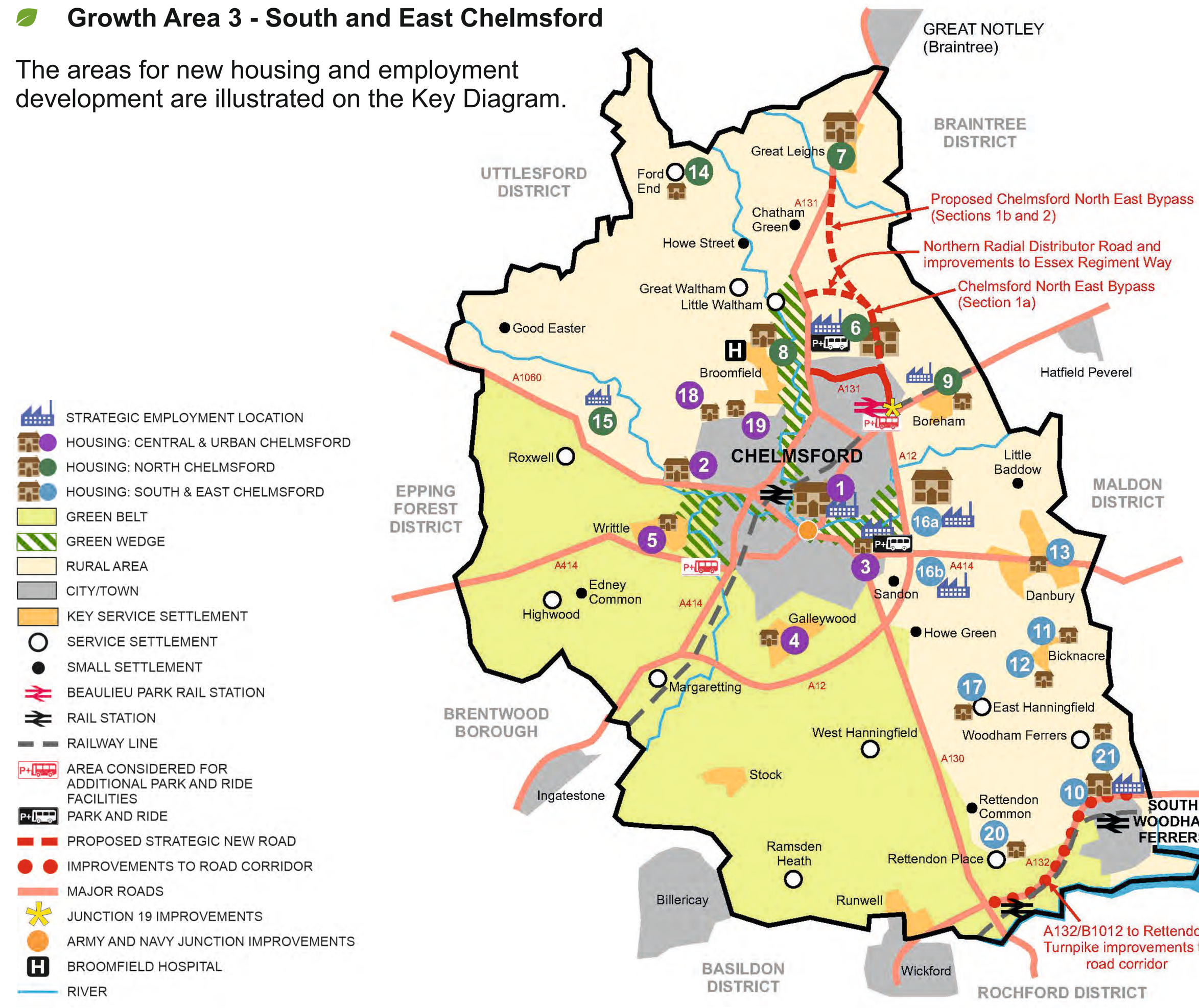
Key Diagram

The sites are distributed in accordance with the current Spatial Strategy including within and on the edge of existing built-up areas taking advantage of existing services and facilities and good levels of accessibility.

The Spatial Strategy identifies three broad geographic areas where new development growth will be accommodated. This comprises:

- **Growth Area 1 - Central and Urban Chelmsford**
- **Growth Area 2 - North Chelmsford**
- **Growth Area 3 - South and East Chelmsford**

The areas for new housing and employment development are illustrated on the Key Diagram.

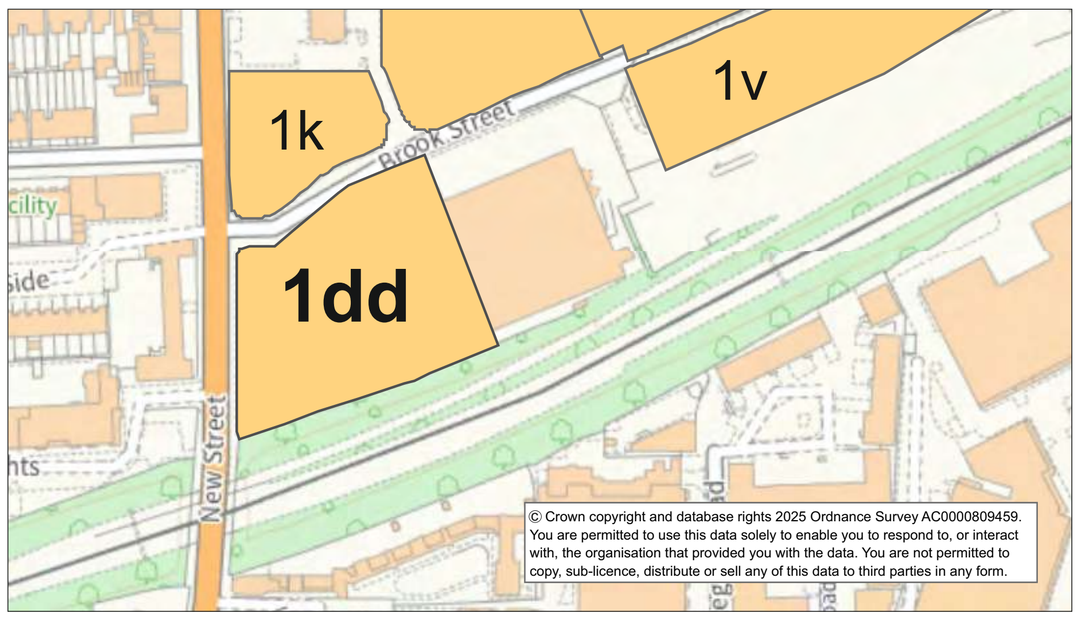


Chelmsford Local Plan

Growth Area 1 – Central and Urban Chelmsford

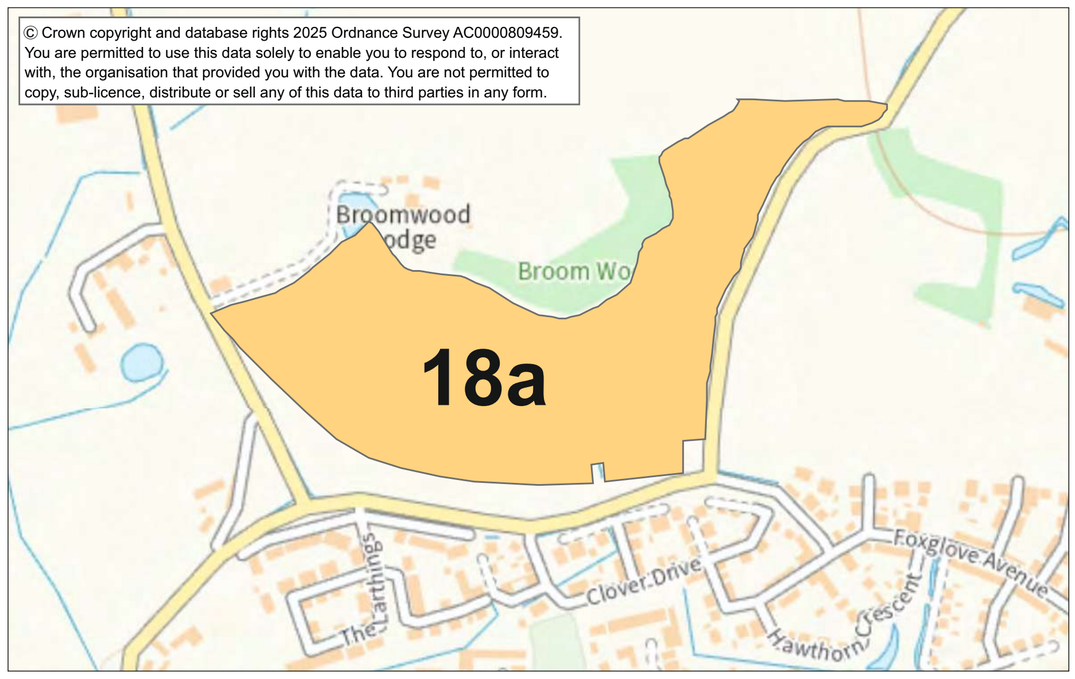
1dd Land at former Kay Metzeler Premises Brook Street, Chelmsford

- 100 homes (new site)



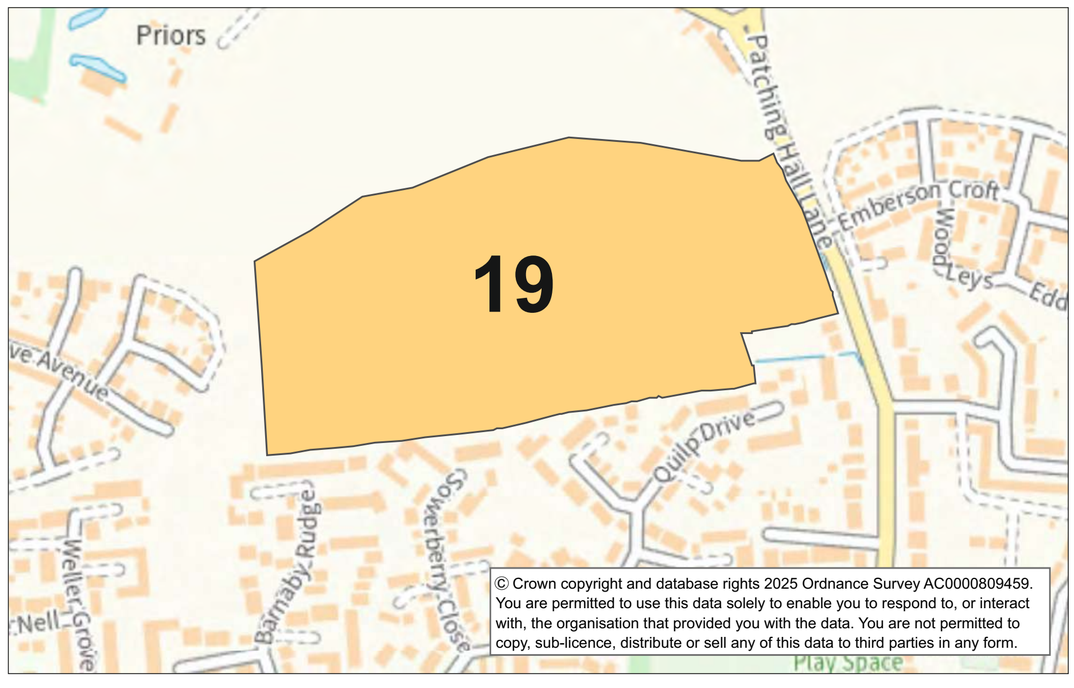
18a Land North West of Chelmsford (North of Hollow Lane)

- 100 homes (new site)



19 Land West of Patching Hall Lane, Chelmsford

- 200 homes (new site)



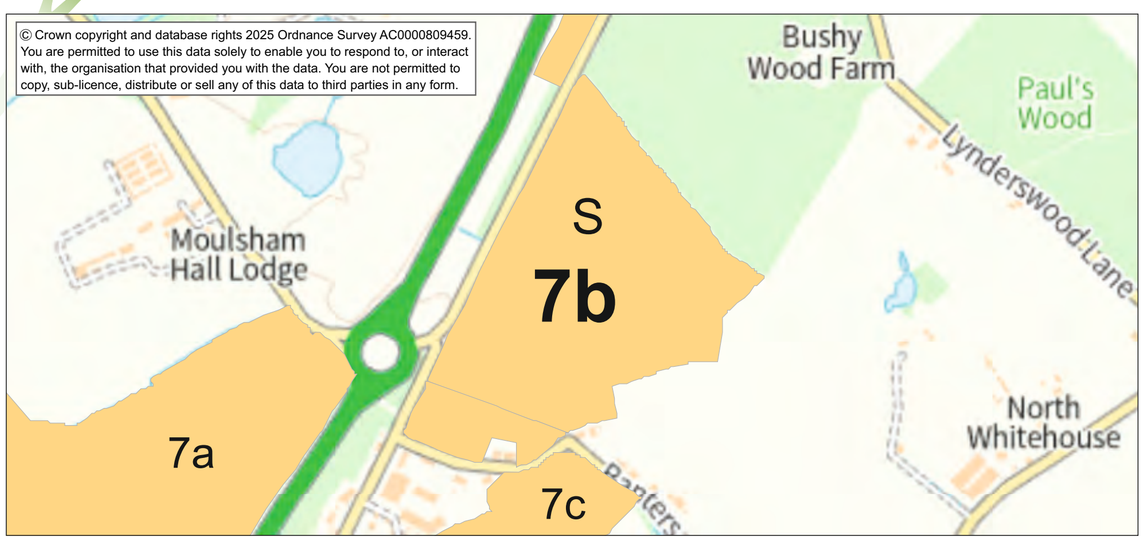
Supporting infrastructure for Growth Area 1

Financial contributions towards:

- Road network enhancements
- Active and sustainable transport
- Cycle routes, footpaths and bridleways where appropriate
- Sport, leisure and recreation facilities
- Secondary, primary, and early years childcare
- Community facilities such as healthcare and emergency service facilities

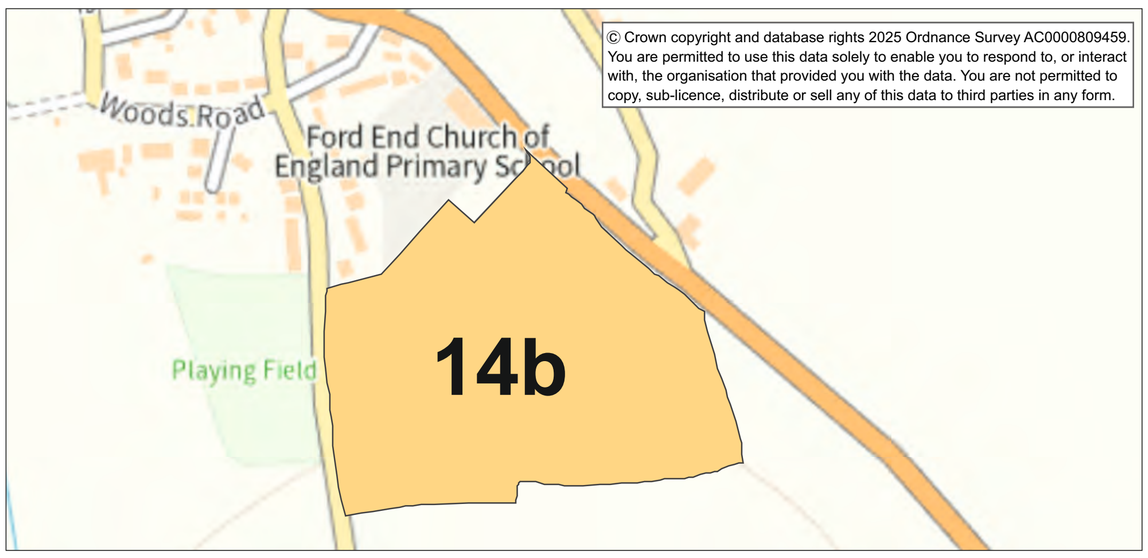
Chelmsford Local Plan

Growth Area 2 – North Chelmsford



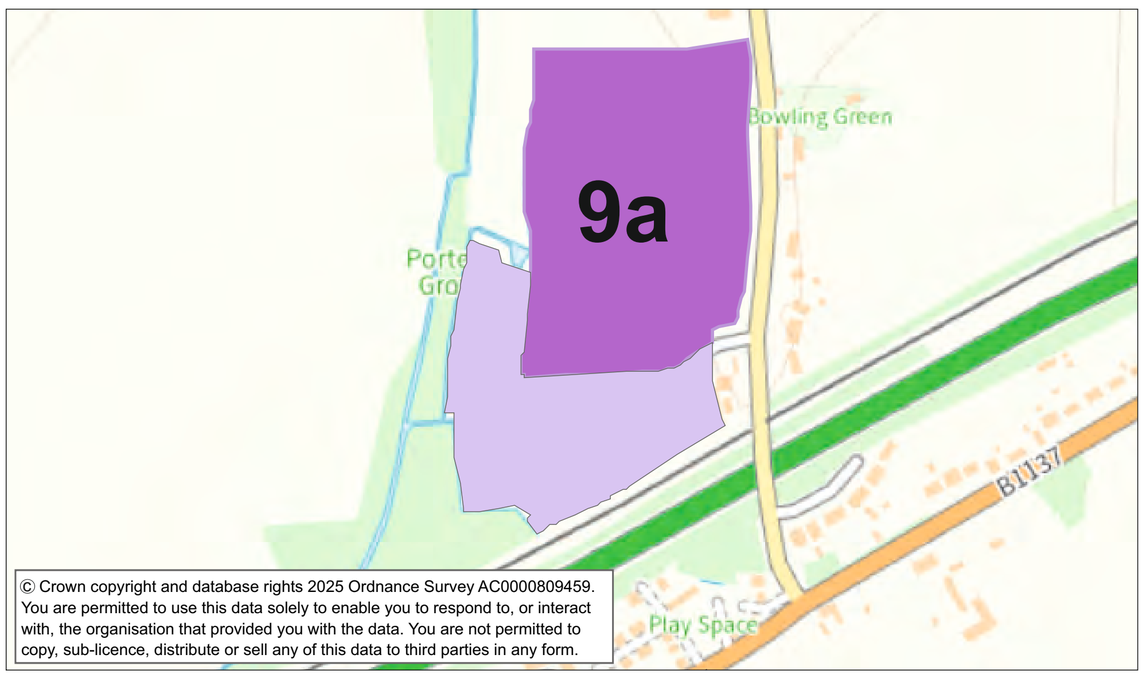
7b Land East of London Road , Great Leighs

- 390 homes, of which 190 for older people (increase from 250 homes)



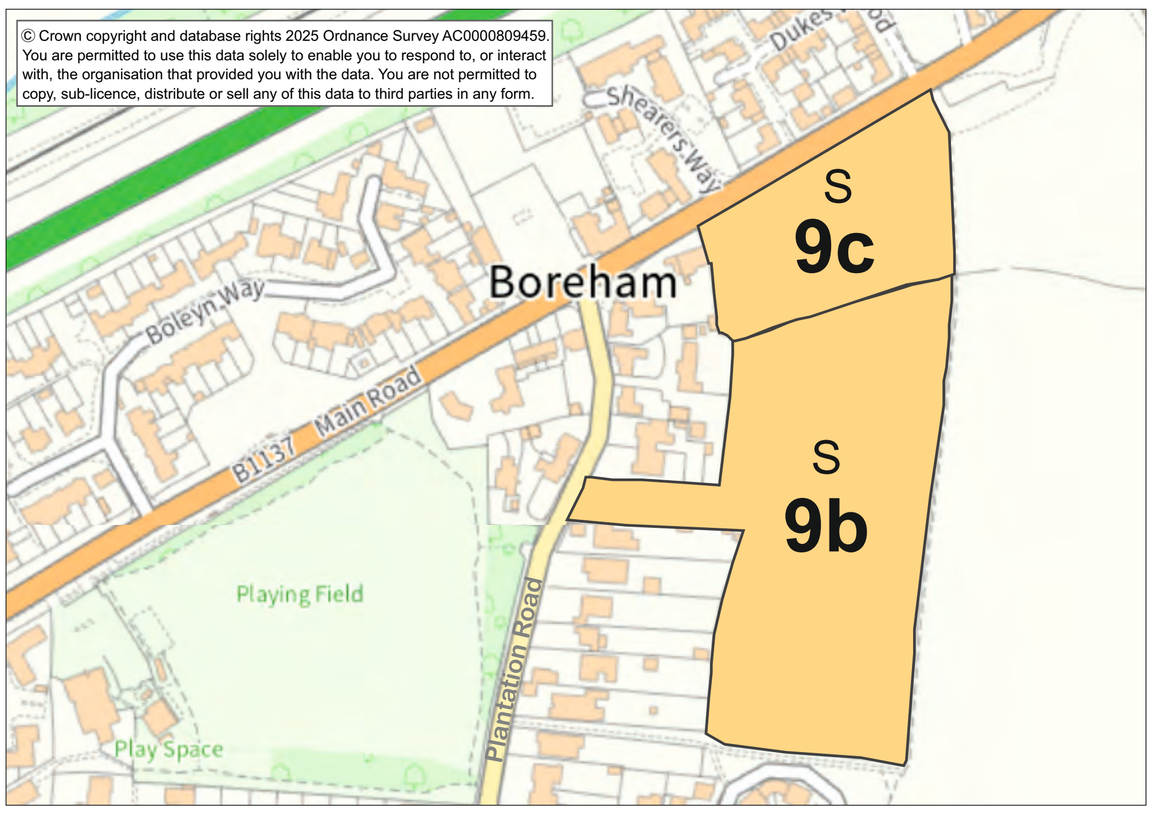
14b Land South of Ford End Primary School

- 75 homes (increase from 20 homes)
- A new community/village hall
- Parking area for Ford End Primary School staff



9a Waltham Road Employment Area, Boreham

- 14,000sqm employment for E(g)(iii)/B2/B8 use (increase from 3,500sqm)



9c South of Main Road and Dukes Wood Close, Boreham

- 22 homes for older people (new site)

9b Land to the East of 118 to 114 Plantation Road, Boreham

- 60 homes for older people (new site)

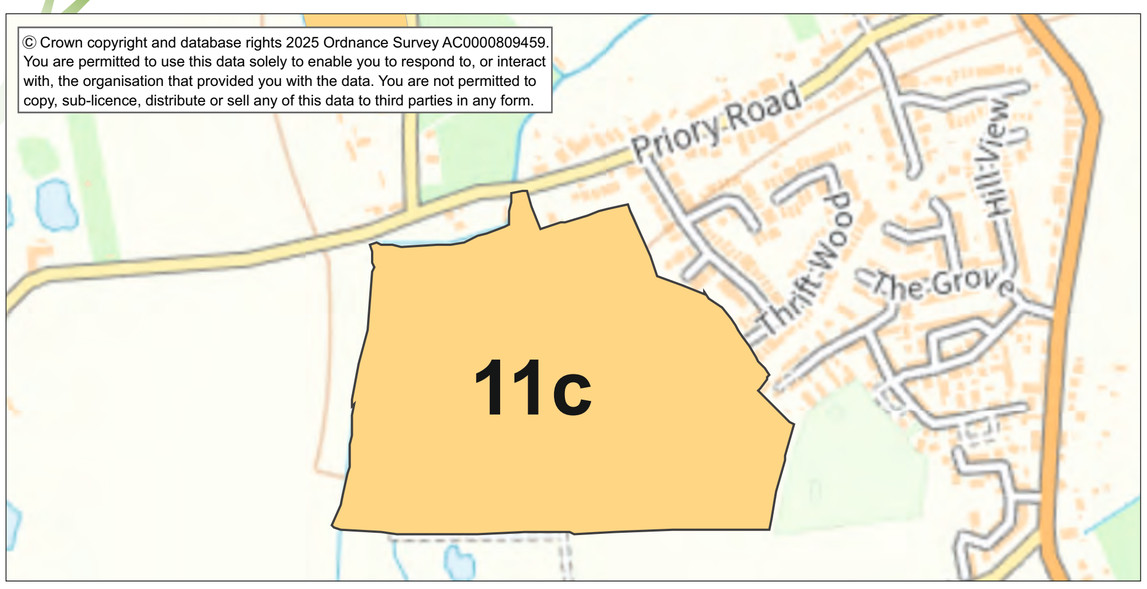
Supporting infrastructure for Growth Area 2

Financial contributions towards:

- Road network enhancements
- Active and sustainable transport
- Cycle routes, footpaths and bridleways where appropriate
- Sport, leisure and recreation facilities
- Secondary, primary, and early years childcare
- Community facilities such as healthcare and emergency service facilities

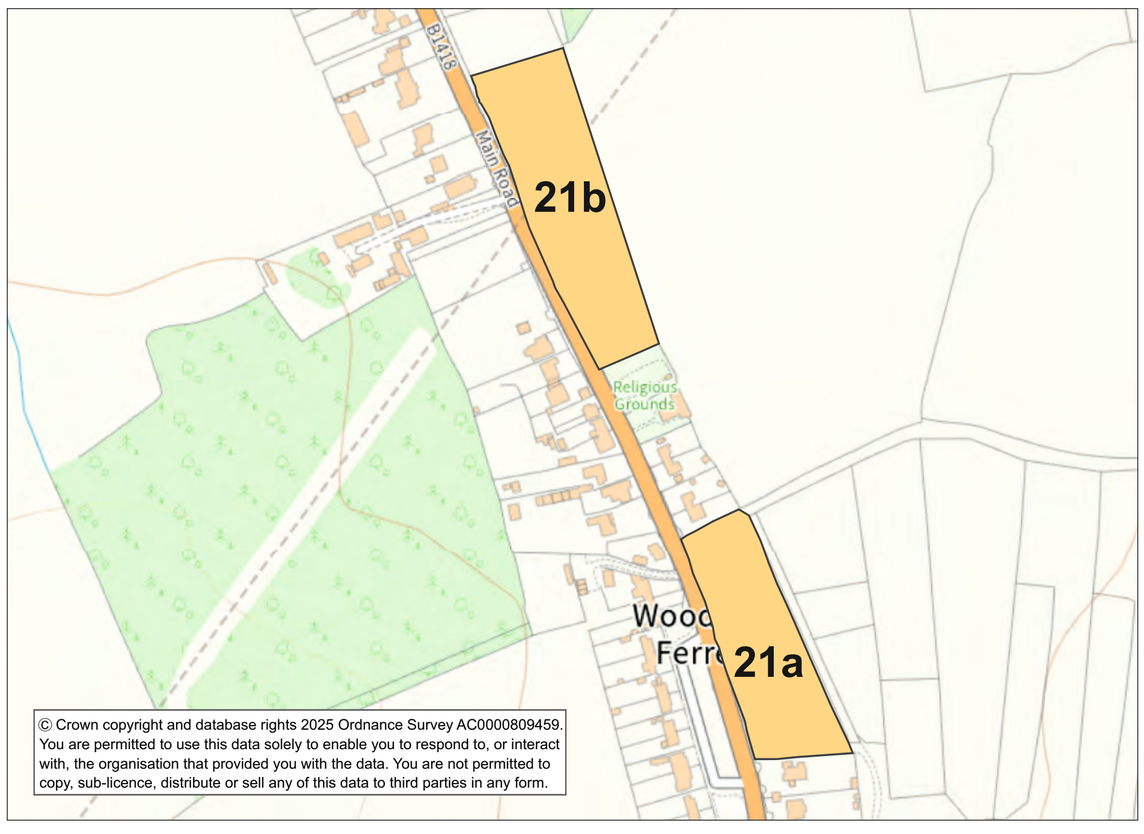
Chelmsford Local Plan

Growth Area 3 – South and East Chelmsford



11c Land West of Barbrook Way, Bicknacre

- 250 homes (increase from 20 homes)
- Community facility
- Early years/childcare nursery

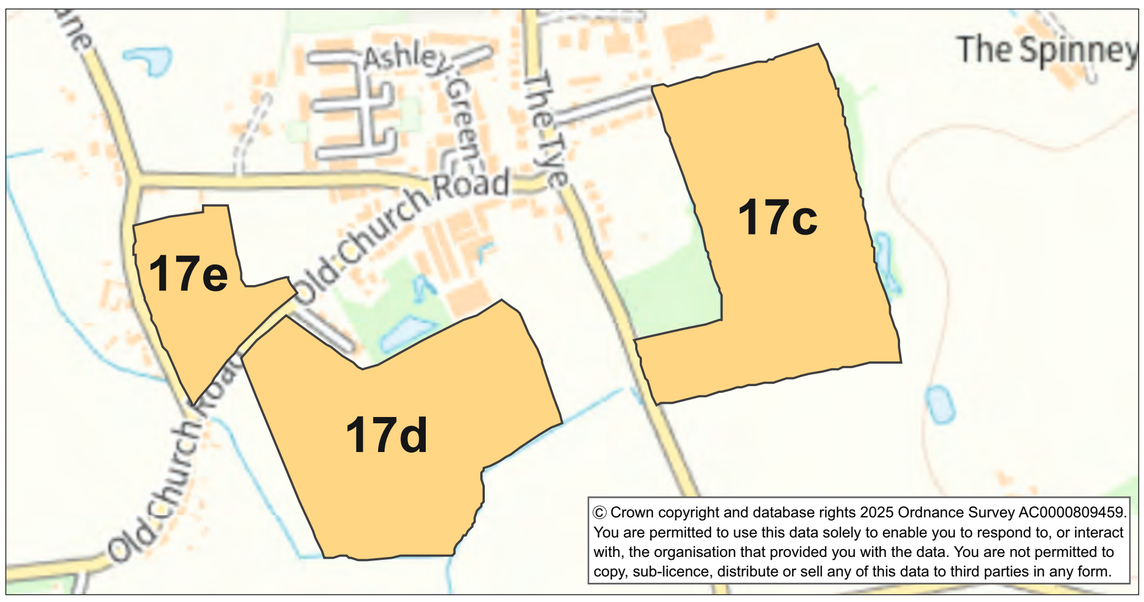


21a Land North of Old Rectory Lodge, Main Road, Woodham Ferrers

- 15 homes

21b Land North of Congregational Church, Main Road, Woodham Ferrers

- 15 homes



17c Land South of Rough Hill Complex, The Tye, East Hanningfield

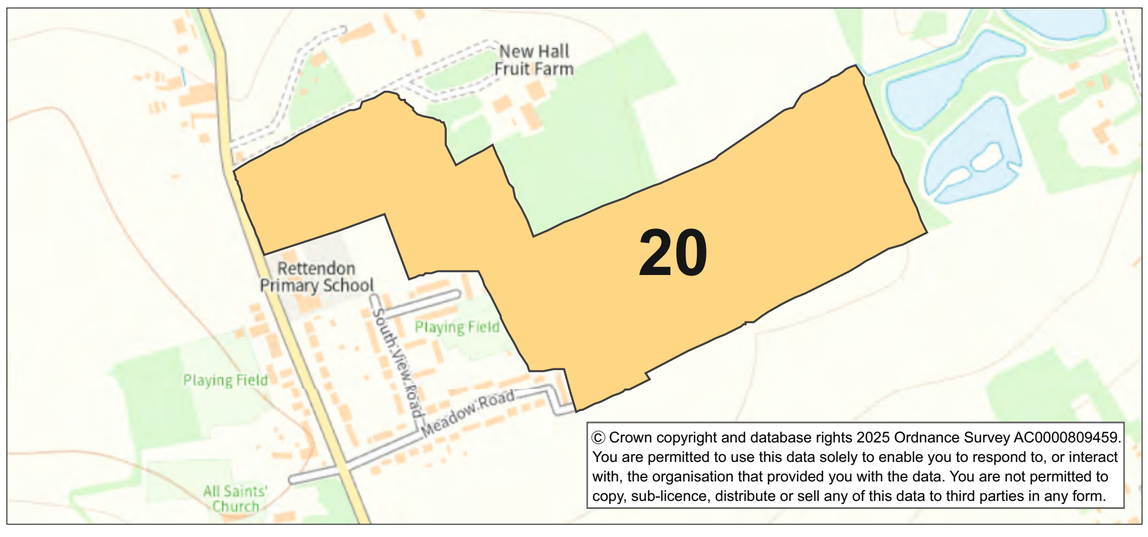
- 115 homes (new site)

17d Land South and South East of East Hanningfield Village

- 150 homes (new site)

17e Land South of Windmill Farm, Back Lane, East Hanningfield

- 40 homes (new site)



20 Land to East and North of Rettendon Place

- 350 homes (new site)
- New/expanded early years/childcare nursery
- Land for expansion of primary school

Supporting infrastructure for Growth Area 3

Financial contributions towards:

- Road network enhancements
- Active and sustainable transport
- Cycle routes, footpaths and bridleways where appropriate
- Sport, leisure and recreation facilities
- Secondary, primary, and early years childcare
- Community facilities such as healthcare and emergency service facilities

Chelmsford Local Plan

What else are we consulting on?

Other policy changes

Including the additional sites means that some other policies in the plan need to be updated as a consequence. These include:

Strategic Policy S6 – Housing and Employment Requirements

Changes include:

- Updated housing supply figures to reflect the latest housing needs and monitoring data figures
- An increased amount of allocated employment floorspace
- An increased windfall allowance from 175 to 195 new homes a year.

Strategic Policy S7 – The Spatial Strategy

Changes include updates to include the additional site allocations and to reflect the latest monitoring data. The Key Diagram has also been updated to show the broad location of the additional sites in the City Council's area.

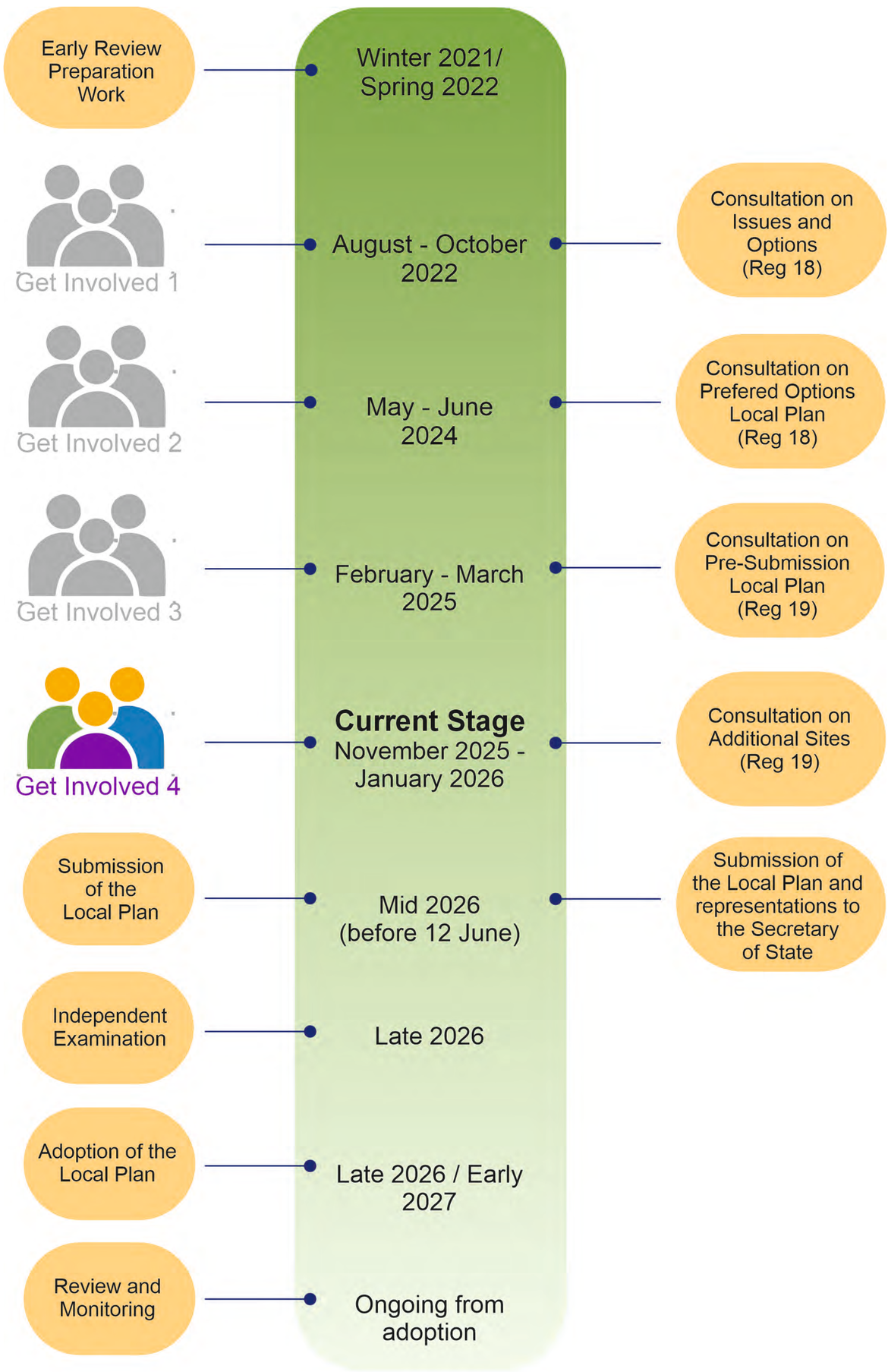
Integrated Impact Assessment

The Integrated Impact Assessment (IIA) combines five different strands of assessment into a single framework:

- Sustainability Appraisal
- Strategic Environmental Assessment
- Habitats Regulations Assessment
- Health Impact Assessment
- Equalities Impact Assessment

The assessment reviews the socio-economic and environmental effects of the Local Plan. Where negative effects are identified, measures will be proposed to avoid, minimise or mitigate (compensate for) such effects. Where any positive effects are identified, measures will be considered that could enhance these effects.

We have updated our Integrated Impact Assessment (IIA) to consider the additional sites and other policy changes. This is published for consultation alongside the Focused Consultation Additional Sites (Regulation 19) Document.



Chelmsford Local Plan

Have your say

How can I make my comments?

If you made comments to the last consultation in February/ March 2025, you do not need to submit them again.

We are consulting for seven weeks.

- Consultation opens at 10.00am on Thursday 20 November and closes at 4.00pm on Thursday 8 January. We cannot consider comments made before or after these dates.

You can read and make new comments on the consultation documents on the Council's Planning Policy Consultation Portal. You can also sign up for alerts to consultation updates. Visit **www.chelmsford.gov.uk/planningpolicyconsult**

You can also download a comments form and e-mail it to **planning.policy@chelmsford.gov.uk,** or post it to Spatial Planning Services, Chelmsford City Council, Duke Street, Chelmsford, CM1 1JE.

We are asking specific questions on whether the Additional Sites (Regulation 19) Document is legally compliant and consistent with national planning policy, which is what the Government requires at this stage. These are called the 'Tests of Soundness'. Detailed guidance on how to make comments is set out in the Statement of Representations at **www.chelmsford.gov.uk/as-sor**

- The comments form, the consultation documents, exhibition materials, and further guidance can also be found at **www.chelmsford.gov.uk/lp-review**

Exhibition dates

Location	Date	Time
Council Chamber, Civic Centre, Duke Street, Chelmsford, CM1 1JE	Thursday 11 December Friday 12 December Saturday 13 December	Staffed drop-in exhibition 6pm - 8pm 1pm - 3pm 10am - 12noon
High Chelmer Shopping Centre, Exchange Way, Chelmsford, CM1 1XB	Monday 1 December to Monday 8 December	Unstaffed exhibition panels during shopping centre opening hours
South Woodham Ferrers Town Council, Champions Manor Hall, Hullbridge Road, South Woodham Ferrers, CM3 5LJ	Thursday 4 December to Tuesday 9 December	Unstaffed exhibition panels displayed 9am - 4pm weekdays, Saturday 9am - 3.30pm, Sunday closed

Next steps

We will send all the comments made to this focused consultation, along with all the comments made to the last consultation in February/March 2025, to the Planning Inspector. We will also send the Inspector a summary of the main issues raised and publish it online.

Chelmsford Local Plan

Local Plan Video

Click on the link, or copy and paste into your browser, to view the consultation materials.

Local Plan Video: https://youtu.be/ZGpTRMhDIhw



Review of the Chelmsford Local Plan - Focused Consultation 'Additional Sites'

Essex Chronicle Advert

Chelmsford City Council's Local Plan was adopted in 2020. It sets out how much new development is needed and identifies land for housing, schools, shops and jobs as well as areas for protection.

In Spring 2025, we consulted on a Pre-Submission Local Plan. We are now undertaking a focused consultation on additional site allocations to add into the new plan to ensure that sufficient land for new housing and employment development is identified.

The consultation will run for **seven weeks from 10am on 20 November 2025 until 4pm on 8 January 2025** and focus on the soundness of:

- 11 additional housing sites
- Four expanded housing and employment sites
- Focused policy changes

Following the consultation, the Council will submit both the Pre-Submission version of the Local Plan and the focused 'Additional Sites' document for examination by an independent Planning Inspector. Representations submitted to both consultations will also be submitted in full. There is no need to resubmit representations submitted as part of the previous Pre-Submission Local Plan consultation.

Find out more at:
www.chelmsford.gov.uk/lp-review

Chelmsford Local Plan

Chelmsford City Council

Covering Letter and Local Plan Poster

Directorate for Sustainable Communities
Spatial Planning Services

Civic Centre Duke Street
Chelmsford Essex CM1 1JE

Telephone: 01245 606330
Date: 21 November 2025

Dear Sir/Madam,

Poster to promote public consultation on the review of the Chelmsford Local Plan

Chelmsford City Council is reviewing its adopted Local Plan. The Local Plan shapes future growth and development across Chelmsford City Council's area. It sets out a positive vision, identifies where and how new development should take place in the future as well as areas for protection. We adopted our current Local Plan in May 2020. We need to review the plan at least every five years to make sure it remains up to date and meets the changing needs for development growth to 2041.

The next stage in the Review of the Chelmsford Local Plan is to consult on the Focused Consultation Additional Sites (Regulation 19) Document. The consultation is open for your comments from **10am on Thursday 20 November 2025 to 4pm on Thursday 8 January 2026.**

An A3 poster which promotes the consultation is enclosed. We would be grateful if this could be displayed in a public place until 8 January 2026.

If you have any queries or would like more information on the review of the Local Plan, please visit www.chelmsford.gov.uk/lp-review, email planning.policy@chelmsford.gov.uk or telephone (01245) 606330.

Yours faithfully,

Jeremy Potter

Spatial Planning Services Manager

Review of the Chelmsford Local Plan - Focused Consultation 'Additional Sites'

The Council's Local Plan was adopted in 2020. It sets out how much new development is needed and identifies land for housing, schools, shops and jobs as well as areas for protection, such as open space and sites important for wildlife.

We need to review the plan at least every five years to ensure that it remains up to date and continues to meet our needs for development growth to 2041.

In Spring 2025, we consulted on a Pre-Submission Local Plan. This was the third consultation on the Local Plan and is referred to as a Regulation 19 consultation.

We are undertaking a second Regulation 19 consultation to ensure that sufficient land for new housing and employment development is identified in the new Local Plan. This consultation will be focused on the soundness of:

- 11 additional housing sites
- Four expanded housing and employment sites
- Focused policy changes

This 'Additional Sites' focused consultation will run for seven weeks from 10am on 20 November 2025 until 4pm on 8 January 2026.

Read and comment on the consultation documents at:
www.chelmsford.gov.uk/planningpolicyconsult.

They will also be available to read during normal opening hours at the Council's Customer Service Centre in Chelmsford.

We will also be holding in-person exhibitions at the Civic Centre, Duke Street, Chelmsford, CM1 1JE. These exhibitions will provide an opportunity for you to find out more and discuss the consultation with a Planning Officer.

Visit an exhibition:

Thursday 11 December 2025	Civic Centre	6pm - 8pm
Friday 12 December 2025	Civic Centre	1pm - 3pm
Saturday 13 December 2025	Civic Centre	10am - 12pm

Find out more at **www.chelmsford.gov.uk/lp-review,** telephone 01245 606330 or email **planning.policy@chelmsford.gov.uk.**

Chelmsford Local Plan

Chelmsford City Council

Site Notices - Examples

LOCAL PLAN SITE NOTICE

ADDITIONAL SITES CONSULTATION
20 NOVEMBER 2025 — 8 JANUARY 2026

Site 18a Land North West of Chelmsford (North of Hollow Lane)

Chelmsford City Council have published for consultation an
nal Sites (Regulation 19) Document

on changes to the new draft Local Plan published in
es focus on additional sites for new housing and employ-
draft Local Plan. This is to ensure that sufficient land for de-
ite 18a on the map below is a proposed new housing

e document at www.chelmsford.gov.uk/
Paper copies of the document can also be viewed at the
Service Centre at the Civic Centre, Chelmsford, Monday to
information on this consultation is available at
k/lp-review.



To find out more and discuss the consultation with a Planning Officer visit an in-person exhibition at the Civic Centre, Duke Street, Chelmsford on:

Thursday 11 December 6pm to 8pm
Friday 12 December 1pm to 3pm
Saturday 13 December 10am to 12pm

Please check our website www.chelmsford.gov.uk/lp-review for full details of all exhibitions and any changes to the timetable before making a trip.

All representations must be received by 4pm on Thursday 8 January 2026.
If you require further assistance please call 01245 606330.

Chelmsford City Council

LOCAL PLAN SITE NOTICE

ADDITIONAL SITES CONSULTATION
20 NOVEMBER 2025 — 8 JANUARY 2026

Site 9c South of Main Road and Dukes Wood Close, Boreham

Chelmsford City Council have published for consultation an Additional Sites (Regulation 19) Document

The Council is consulting on changes to the new draft Local Plan published in Spring 2025. The changes focus on additional sites for new housing and employment to be added to the draft Local Plan. This is to ensure that sufficient land for development is identified. **Site 9c** on the map below is a proposed **new housing site.**

Read and comment on the document at www.chelmsford.gov.uk/planningpolicyconsult. Paper copies of the document can also be viewed at the City Council's Customer Service Centre at the Civic Centre, Chelmsford, Monday to Friday 10am to 4pm. All information on this consultation is available at consult elmsford.gov.uk/lp-review.



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Chelmsford City Council

SITE NOTICE

CONSULTATION
- 8 JANUARY 2026

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Chelmsford City Council

Website Banner



Staff E-mail Banner



Chelmsford Local Plan

Local Plan Review Newsletter

NUMBER 4 November 2025

What is a Local Plan?

Chelmsford City Council's Local Plan sets out a positive vision, addressing how much new development is needed and identifies land for housing, schools, shops and jobs, as well as land uses that will be protected. The current plan was adopted in 2020, and we need to review it at least every five years to ensure it keeps up to date.

What has changed?

In February/March 2025, we consulted on a full Pre-Submission Local Plan to meet our needs for development growth until 2041.

Changes to that plan are needed in light of several factors outside the City Council's control that have affected future housebuilding. These include:

- The Government cancelling the A12 widening scheme
- Three key sites having stalled or been significantly delayed
- Other developers slowing down their build rates
- The Government's increased housing target having to be met through the plan (a change since May 2025)

This means we do not have enough allocated housing sites to meet our housing needs, particularly for the first five years of the plan.

What we are proposing

We have selected the additional sites following detailed testing of site constraints and opportunities in relation to matters like flood risk, heritage, traffic and archaeology. They are located in settlements which are accessible to the local highway network and services and accord with the plan's Spatial Strategy. The schools in these areas can accommodate the additional growth.

Inside this newsletter are a list and a map of the additional site allocations. You can comment on any of the additional site allocations, and also on specific changes we would need to make to other proposed policies to reflect the updated position.

If you made comments to the last consultation in February/ March 2025, you do not need to submit them again. We will not be able to accept any comments on parts of the Pre-Submission Local Plan that have not changed.

Additional and expanded sites

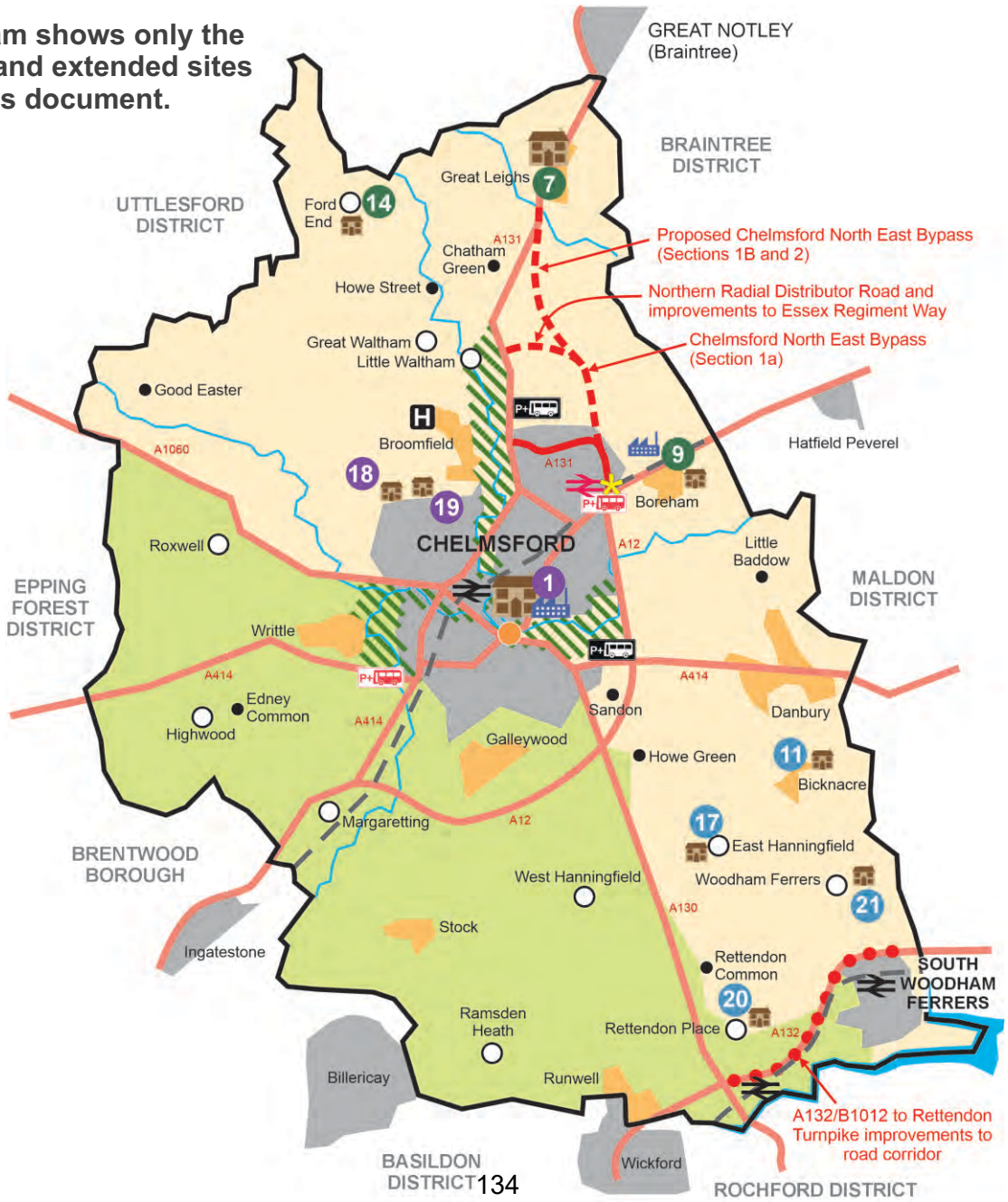
This newsletter is a summary of the Focused Consultation Additional Sites (Regulation 19) Document. Before making your comments, you are advised to read the full document at www.chelmsford.gov.uk/lp-review

We are continuing our approach in the adopted Local Plan and the Pre-Submission Local Plan that we consulted on in February/March 2025 by focusing housing and employment growth to the most sustainable locations in three Growth Areas.

We are proposing to add 11 new housing sites and expand the proposed allocations for three housing sites. This will provide a total of 1,592 additional homes over the plan period to 2041, and help meet the latest housing needs figure of 1,210 new homes a year. We are also proposing to add a further 10,500sqm of employment space to a proposed employment site.

In addition, we will also be consulting on some key consequential changes to Strategic Policy S6 – Housing and Employment Requirements, and Strategic Policy S7 – The Spatial Strategy, along with minor changes to the monitoring framework, trajectories for the delivery of the additional sites, and a small number of Policies Map changes which show the additional sites.

This diagram shows only the additional and extended sites listed in this document.



Central and Urban Chelmsford	North Chelmsford	South and East Chelmsford
1 Chelmsford Urban Area 1dd Land at former Kay Metzeler Premises, Brook Street - 100 homes	**7 Great Leighs** 7b Land East of London Road - 390 homes (of which 190 for older people) *Increase from 250 homes*	**11 Bicknacre** 11c Land West of Barbrook Way - 250 homes - Community facility - Early years/childcare nursery *Increase from 20 homes*
18 North West Chelmsford 18a Land North West of Chelmsford (North of Hollow Lane) - 100 homes	**9 Boreham** 9a Waltham Road Employment Area - 14,000sqm employment for E(g)(iii)/B2/B8 use *Increase from 3,500sqm* 9b Land to the East of 118 to 114 Plantation Road - 60 homes for older people 9c South of Main Road and Dukes Wood Close - 22 homes for older people	**17 East Hanningfield** 17c Land South of Rough Hill Complex, The Tye - 115 homes 17d Land South and South East of East Hanningfield Village - 150 homes 17e Land South of Windmill Farm, Back Lane - 40 homes
19 Land West of Patching Hall Lane 19 Land West of Patching Hall Lane - 200 homes	**14 Ford End** 14b Land South of Ford End Primary School - 75 homes - A new community/village hall - Parking area for Ford End Primary School staff *Increase from 20 homes*	**20 Rettendon Place** 20 Land to East and North of Rettendon Place - 350 homes - New early years/childcare nursery - Land for expansion of primary school
		21 Woodham Ferrers 21a Land North of Old Rectory Lodge, Main Road - 15 homes 21b Land North of Congregational Church, Main Road - 15 homes

In addition to the above, additional and expanded sites will also be required to provide or make financial contributions towards the following:

- Improvements to the local and strategic road network as required by the Local Highways and Transportation Authority
- Measures to promote and enhance active and sustainable modes of transport
- New or enhanced sport, leisure and recreation facilities
- Primary, secondary, early years education and childcare, as required by the Local Education Authority (apart from sites 9a, 9b and 9c)
- Other community facilities including healthcare provision as required by the NHS Mid and South Essex Integrated Care Board, and police, ambulance and fire and rescue facilities.

How can I make my comments?

If you made comments to the last consultation in February/March 2025, you do not need to submit them again.

We are consulting for seven weeks. Consultation opens at 10.00am on Thursday 20 November and closes at 4.00pm on Thursday 8 January. We cannot consider comments made before or after these dates.

You can read and make new comments on the consultation documents on the Council's Planning Policy Consultation Portal. You can also sign up for alerts to consultation updates. Visit www.chelmsford.gov.uk/planningpolicyconsult

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We are also holding exhibitions at the Civic Centre where you can find out more from a Planning Officer:

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Next Steps

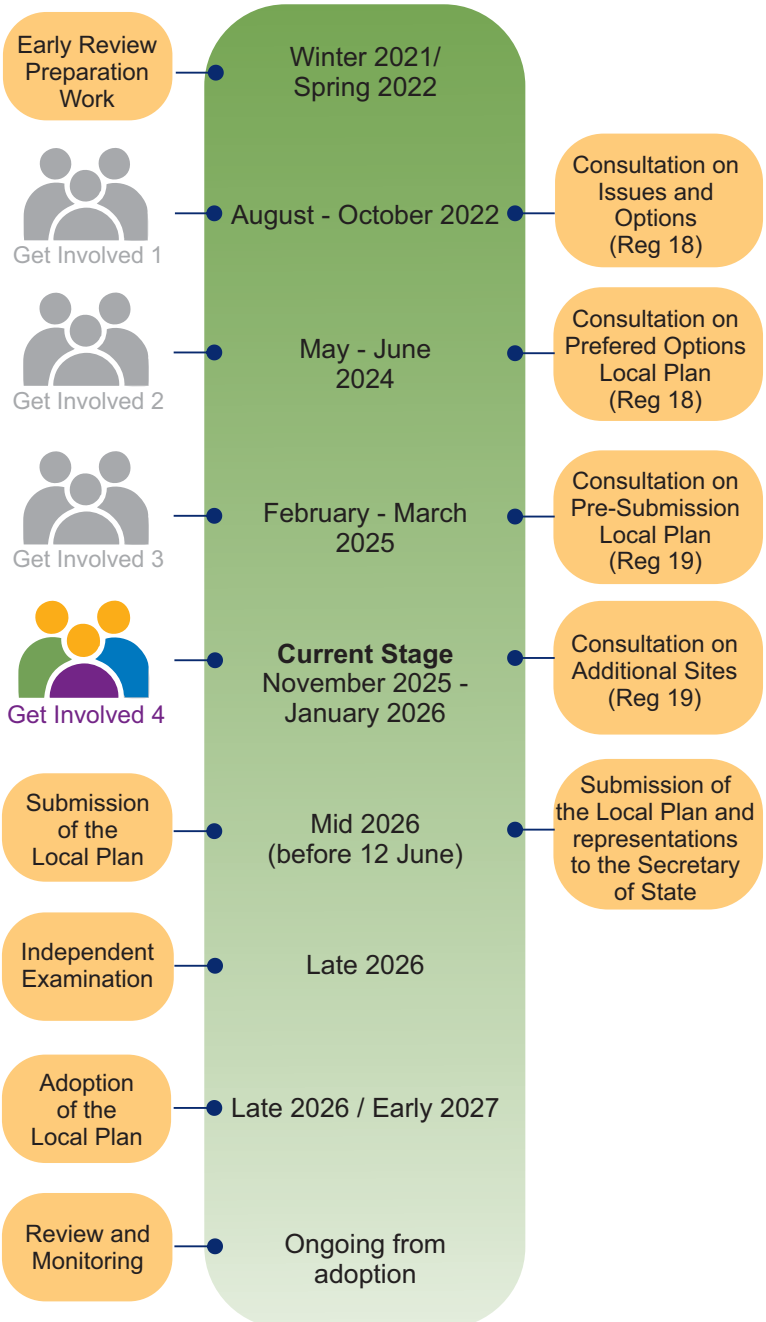
We will send all the comments made to this focused consultation, along with all the comments made to the last consultation in February/March 2025, to the Planning Inspector. We will also send the Inspector a summary of the main issues raised and publish it online.

What else are you consulting on?

We have updated our Integrated Impact Assessment (IIA) to consider the additional sites and other policy changes. The IIA assesses sustainability and strategic environmental impacts, Habitats Regulations, and health and equality impacts of our proposals.

We will publish an IIA Addendum covering the updates for consultation, alongside the Focused Consultation Additional Sites (Regulation 19) Document.

What is the Local Plan timetable?



Chelmsford City Council

Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19)
Parish/Town Council Information Pack
Planning Policy, November 2025

Part A - General information that is relevant to all Parish / Town Councils

Review of Chelmsford's Local Plan

The Council's Local Plan was adopted in 2020 and it guides growth and development across Chelmsford City Council's area to 2036.

We need to review the plan at least every five years to ensure that it remains up to date and continues to meet our needs for development growth to 2041. This includes new homes, employment opportunities and facilities for local people such as new schools, healthcare provision and upgraded transport infrastructure.

The review of the adopted Chelmsford Local Plan commenced in Winter 2021 and following consultations in 2022 and 2024, the Pre-Submission (Regulation 19) version was published for consultation in Spring 2025. A further focused stage of consultation is being undertaken on additional sites to add to the Pre-Submission (Regulation 19) Local Plan to ensure that sufficient land for new housing and employment development is identified.

Consultation on the Focused Consultation Additional Sites (Regulation 19) Document (Additional Sites Document for short) runs for a period of seven weeks **from 10am on Thursday 20 November 2025 to 4pm on Thursday 8 January 2026**. Communities can find out more at www.chelmsford.gov.uk/lp-review.

The Chelmsford Local Plan - Focused Consultation Additional Sites (Regulation 19) Document

This document is a focused consultation on additional site allocations for housing and employment development. The development trajectories for the delivery of the additional sites and key consequential plan changes arising from the additional sites allocation policies are also subject to consultation alongside an Integrated Impact Assessment (IIA) Addendum which assesses the changes.

The additional sites comprise 11 new housing sites, three expanded housing sites and one expanded employment site.

The consultation will be undertaken in accordance with Regulation 19 of the Local Plan Regulations and the Council's Statement of Community Involvement (2025).

Following this stage, the Council will submit both the Pre-Submission Local Plan published for consultation in Spring 2025 and this Additional Sites Document for examination by an independent Planning Inspector. Representations submitted to both consultations will also be submitted in full. **There is no need to resubmit representations submitted as part of the previous Pre-Submission Local Plan consultation.** The Pre-Submission Local Plan and the Additional Sites (including the key consequential plan changes) contained within the consultation will be incorporated together in a single new Local Plan before being finalised for adoption.

Why are we undertaking a Focused Consultation on Additional Sites?

During the plan's preparation, it has emerged that we need to add more land for homes and employment use into the plan to meet future needs. This is because some sites in the adopted Local Plan have not come forward and some sites will not be built as quickly as expected. That means our housing need figure has become out of date because we do not have enough allocated housing sites to meet our needs for the first five years of the plan.

In response to this, the Council has identified additional housing site allocations for inclusion within the Pre-Submission (Regulation 19) Local Plan to help enable it to be found "sound" at examination. It also identifies the expansion of an existing allocated employment site to support the increased housing requirement and boost employment floorspace supply.

Where to view the consultation documents

You can read the consultation documents in the following ways:

- On the Council's Consultation Portal at www.chelmsford.gov.uk/planningpolicyconsult. This system also allows you to submit comments to the consultations
- On the Council's website alongside the Local Plan evidence base documents at www.chelmsford.gov.uk/lp-review
- At the Chelmsford City Council Customer Service Centre, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford CM1 1JE (10am to 4pm Monday to Friday).
- At the following drop-in public exhibitions. These will provide an opportunity to meet an officer face-to-face unless otherwise stated.

Location	Date	Time
Council Chamber, Civic Centre, Duke Street, Chelmsford, CM1 1JE	Thursday 11 December	6pm - 8pm
	Friday 12 December	1pm - 3pm
	Saturday 13 December	10am - 12noon

Location	Date	Time
High Chelmer Shopping Centre, Exchange Way, Chelmsford, CM1 1XB	Monday 1 December to Monday 8 December	Unstaffed exhibition panels displayed all-day during shopping centre opening hours
South Woodham Ferrers Town Council, Champions Manor Hall, Hullbridge Road, South Woodham Ferrers, CM3 5LJ	Wednesday 3 December to Wednesday 10 December	Unstaffed exhibition panels displayed 9am - 4pm weekdays, Saturday 9am – 3:30pm, Sunday closed

Please check our website www.chelmsford.gov.uk/lp-review for any updates before making your journey.

How to comment

In line with national planning legislation, the consultation will focus solely on whether the Additional Sites Document complies with all relevant legislation, complies with the Duty to Co-operate and meets the tests of soundness set out in national planning policy.

You can comment on the consultation documents in the following ways:

Online Consultation Portal:
Go to: www.chelmsford.gov.uk/planningpolicyconsult where you can:

- Read the consultation documents
- Make your comments via the specially designed representation form
- Sign up for alerts to feedback reports and future consultations

This is our preferred means of receiving comments as it ensures that your comments are recorded accurately and are processed quickly.

If you have not used this system before or have any difficulties logging in, please see our guidance notes at:www.chelmsford.gov.uk/lp-portal-guide or call us on (01245) 606330.

In writing:
If you prefer to send comments in writing, please fill in the relevant specially designed representation forms for each consultation event.

Local Plan representation forms cover the Chelmsford Local Plan – Focused Additional Sites (Regulation 19) Document and the Integrated Impact Assessment: Focused Consultation Additional Sites (Regulation 19) Addendum.

The Local Plan representation forms can be downloaded at www.chelmsford.gov.uk/lp-review. Paper copies of these representation forms for are also available from Chelmsford City Council's Customer Service Centre (details above) or on request by telephoning (01245) 606330 or emailing planning.policy@chelmsford.gov.uk

Forms can be returned:

- By e-mail to planning.policy@chelmsford.gov.uk
- By post to Planning Policy, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE
- By hand to Chelmsford City Council Customer Service Centre (details above).

The use of the Local Plan representation forms is strongly recommended as this will ensure that comments are related to the matters relevant to the subsequent Independent Examination by a Planning Inspector.

If you do not have access to a computer, you can request paper copies. A charge will be made to cover printing and postage costs.

If you have difficulties making representations by e-mail or post due to a disability, please call us (01245) 606330.

Please note that any representations must be received by the Council no later than 4pm on Thursday 8 January 2026. We are unable to accept anonymous representations, and any comments received after the closing date cannot be accepted.

Part B – Optional information by Parish/Town Council area

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in the Unparished Area of Chelmsford?

The Additional Sites Document identifies one new site allocation in Chelmsford's Urban Area. This is Strategic Growth Site 1dd (SGS1dd) – Land at Former Kay-Metzeler Premises, Brook Street. This is a vacant brownfield site adjacent to the City Centre for around 100 new homes. The site allocation policy includes requirements for highway infrastructure improvements and financial contributions to community and recreational facilities.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Boreham Parish?

The Additional Sites Document identifies three site allocations in Boreham. This includes one expanded employment area and two new sites for specialist residential accommodation.

Strategic Growth Site 9a (SGS9a) – Waltham Road Employment Area, Boreham is allocated for 14,000sqm of floorspace for light industrial processes, general industrial processes and storage and distribution. This is an increase of 10,500sqm from the previous consultation and on a larger area.

Growth Site 9b (GS9b) – Land to the East of 118 to 124 Plantation Road, Boreham is allocated for around 60 homes of age restricted housing for older people.

Growth Site 9c (GS9c) – South of Main Road and Dukes Wood Close, Boreham is directly adjacent to GS9b and is allocated for around 22 homes of age restricted housing for older people.

All three site allocation policies include requirements for highway infrastructure improvements and green infrastructure.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Broomfield Parish?

The Additional Sites Document identifies one new housing site allocation wholly within the Broomfield Parish and one new housing site partially within Broomfield Parish.

Strategic Growth Site 19 (SGS19) – Land West of Patching Hall Lane lies wholly within Broomfield Parish. It is allocated for around 200 homes of mixed type and size including affordable housing.

Strategic Growth Site Policy 18a (SGS18a) – Land North West of Chelmsford (North of Hollow Lane) is partially within Broomfield Parish Council and partially within Chignal Parish Council. It is allocated for around 100 new homes of mixed size and type including affordable housing.

Both site allocation policies include requirements for highway infrastructure improvements and financial contributions to community and recreational facilities.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Chelmer Village Parish?

No additional housing or employment sites are identified in Chelmer Village Parish within the Additional Sites Document.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Chelmsford Garden Community Parish?

No additional housing or employment sites are identified in Chelmsford Garden Community Parish within the Additional Sites Document.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Chignal Parish?

The Additional Sites Document identifies one new housing site partially within the Chignal Parish boundary.

Strategic Growth Site Policy 18a (SGS18a) – Land North West of Chelmsford (North of Hollow Lane) is partially within Broomfield Parish Council and partially within Chignal Parish Council. It is allocated for around 100 new homes of mixed size and type including affordable housing. The site allocation policy includes highway infrastructure improvements and financial contributions to community and recreational facilities.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Danbury Parish?

No additional housing or employment sites are identified in Danbury Parish within the Additional Sites Document.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in East Hanningfield Parish?

Three new housing sites have been identified within the Additional Sites Document in the East Hanningfield Parish.

Strategic Growth Site 17c (SGS17c) – Land South of Rough Hill Complex, The Tye, East Hanningfield is allocated for around 115 homes of mixed type and size with affordable housing.

Strategic Growth Site 17d (SGS17d) – Land South East of East Hanningfield Village is an allocation for around 150 homes of mixed type and size with affordable housing.

Growth Site 17e (GS17e) – Land South of Windmill Farm, Back Lane, East Hanningfield is an allocation for around 40 homes of mixed type and size including affordable housing.

All three site allocation policies include requirements for highway infrastructure improvements and financial contributions to community, educational and recreational facilities.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Galleywood Parish?

No additional housing or employment sites are identified in Galleywood Parish within the Additional Sites Document.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Good Easter Parish?

No additional housing or employment sites are identified in Good Easter Parish within the Additional Sites Document.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Great & Little Leighs Parish?

The Additional Sites Document identifies an expanded housing site in Great and Little Leighs Parish.

Strategic Growth Site 7b (SGS7b) – Land East of London Road, Great Leighs has increased from 250 units to around 390 units. Around 190 units of this allocation will be specialist residential homes for older persons of mixed type and size including affordable housing. Financial contributions to the Chelmsford North East Bypass, educational and community facilities, and recreational facilities are requirements of the site allocation policy.

The boundary of this site (7b) has been expanded to include land north of Banters Lane which was previously part of Local Plan allocation SGS7c. As a result, the boundary of SGS7c has been reduced.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Great Baddow Parish?

No additional housing or employment sites are identified in Great Baddow Parish within the Additional Sites Document.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Great Waltham Parish?

One expanded housing site has been identified within the Additional Sites Document in the Great Waltham Parish.

Growth Site 14b (GS14b) – Land South of Ford End Primary School is allocated for 75 homes. This is an increase of 55 homes from the previous consultation and on a larger area.

The site will include affordable housing, provision of off-road parking for primary school staff and a new community/village hall. The site allocation policy includes requirements for highway infrastructure improvements and financial contributions towards education and recreational facilities. The area for new housing and area for expansion of the existing school are shown on the Draft Policy Map inset.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Highwood Parish?

No additional housing or employment sites are identified in Highwood Parish within the Additional Sites Document.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Little Baddow Parish?

No additional housing or employment sites are identified in Little Baddow Parish within the Additional Sites Document.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Little Waltham Parish?

No additional housing or employment sites are identified in Little Waltham Parish within the Additional Sites Document.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Margaretting Parish?

No additional housing or employment sites are identified in Margaretting Parish within the Additional Sites Document.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Mashbury Parish?

No additional housing or employment sites are identified in Mashbury Parish within the Additional Sites Document.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Pleshey Parish?

No additional housing or employment sites are identified in Pleshey Parish within the Additional Sites Document.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Rettendon Parish?

One site is identified within the Additional Sites Document in the Rettendon Parish.

Strategic Growth Site 20 (SGS20) – Land to East and North of Rettendon Place is allocated for around 350 homes of mixed size and type including affordable housing. The site would include expanding the existing primary school and additional early years and childcare nursery provision. The site allocation policy includes requirements for highway infrastructure improvements and financial contributions to community and recreational facilities.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Roxwell Parish?

No additional housing or employment sites are identified in Roxwell Parish within the Additional Sites Document.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Runwell Parish?

No additional housing or employment sites are identified in Runwell Parish within the Additional Sites Document.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Sandon Parish?

No additional housing or employment sites are identified in Sandon Parish within the Additional Sites Document.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in South Hanningfield Parish?

No housing or employment sites are identified in South Hanningfield Parish within the Additional Sites Document.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in South Woodham Ferrers?

No additional housing or employment sites are identified in South Woodham Ferrers Parish within the Additional Sites Document.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Springfield Parish?

No additional housing or employment sites are identified in Springfield Parish within the Additional Sites Document.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Stock Parish?

No additional housing or employment sites are identified in Stock Parish within the Additional Sites Document.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in West Hanningfield Parish?

No additional housing or employment sites are identified in West Hanningfield Parish within the Additional Sites Document.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Woodham Ferrers and Bicknacre Parish?

One expanded housing site and two new housing sites have been identified within the Additional Sites Document in the Woodham Ferrers and Bicknacre Parish.

Strategic Growth Site 11c (SGS11c) – Land West of Barbrook Way, Bicknacre is allocated for 250 homes. This is an increase of 230 homes from the previous consultation and on a larger area. The homes would be mixed size and type and include affordable housing. The development would provide a community facility, a stand-alone early years and childcare nursery and a multi-user crossing at Priory Road. The site allocation policy includes requirements for highway infrastructure improvements and financial contributions to community and recreational facilities.

Growth Site 21a (GS21a) – Land North of Old Rectory Lodge, Main Road, Woodham Ferrers is allocated for 15 homes including affordable housing.

Growth Site 21b (GS21b) – Land North of Congregational Church, Main Road, Woodham Ferrers is located to the North of GS21a and is allocated for around 15 new homes including affordable housing.

Both GS21a and GS21b site allocation policies include requirements for highway infrastructure improvements and financial contributions to community and recreational facilities.

Does the Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document identify new development in Writtle Parish?

No additional housing or employment sites are identified in Writtle Parish within the Additional Sites Document.

Part C – Chelmsford Local Plan Focused Consultation Additional Sites (Regulation 19) Document – ADDITIONAL SITE ALLOCATIONS AT A GLANCE

Site Ref.	Additional Site Name	Location	Total Proposed Development	Site Status
1dd	Land at Former Kay-Metzeler Premises, Brook Street	Chelmsford Urban Area	100 homes	New allocation
18a	Land North West of Chelmsford (North of Hollow Lane)	Partially within Broomfield and Chignal Parish's	100 homes	New allocation
19	Land West of Patching Hall Lane	Broomfield Parish	200 homes	New allocation
7b	Land East of London Road, Great Leighs	Great and Little Leighs Parish	390 homes, 190 of which are for specialist residential accommodation	Expanded site
9a	Waltham Road Employment Area, Boreham	Boreham Parish	14,000sqm of Use Class E(g)(iii), B2 and B8 floorspace	Expanded site
9b	Land to the East of 118 to 124 Plantation Road, Boreham	Boreham Parish	60 homes for specialist residential accommodation	New allocation
9c	South of Main Road and Dukes Wood Close, Boreham	Boreham Parish	22 homes for specialist residential accommodation	New allocation
14b	Land South of Ford End Primary School	Great Waltham Parish	75 homes	Expanded site
11c	Land West of Barbrook Way, Bicknacre	Woodham Ferrers and Bicknacre Parish	250 homes	Expanded Site
17c	Land South of Rough Hill Complex, The Tye, East Hanningfield	East Hanningfield Parish	115 homes	New allocation
17d	Land South and South East of East Hanningfield Village	East Hanningfield Parish	150 homes	New allocation
17e	Land South of Windmill Farm, Back Lane, East Hanningfield	East Hanningfield Parish	40 homes	New allocation
20	Land to East and North of Rettendon Place	Rettendon Parish	350 homes	New allocation

Site Ref.	Additional Site Name	Location	Total Proposed Development	Site Status
21a	Land North of Old Rectory Lodge, Main Road, Woodham Ferrers	Woodham Ferrers and Bicknacre Parish	15 homes	New allocation
21b	Land North of Congregational Church, Main Road, Woodham Ferrers	Woodham Ferrers and Bicknacre Parish	15 homes	New allocation

Part D – Local Plan Focused Consultation Additional Sites (Regulation 19) advert for use in Parish/Town Council newsletters/publications

See attached.

Planning Policy Team, November 2025
Spatial Planning Services
Chelmsford City Council
01245 606330
planning.policy@chelmsford.gov.uk

Review of the Local Plan - Focused Consultation on Additional Sites

FAQs, November 2025

What is happening now?

The Council is undertaking a focused consultation until 8 January 2026 seeking comments on additional site allocations for inclusion within the review of the Local Plan. The additional sites comprise 11 new housing sites, three expanded housing sites and one expanded employment site. The additional sites development trajectory and key consequential plan changes arising from the additional sites allocation policies are also subject to consultation alongside an Integrated Impact Assessment (IIA) Addendum which assesses the changes.

What is a Local Plan?

The Council's Local Plan adopted in 2020 guides growth and development across Chelmsford City Council's area to 2036. This includes locations for new homes, employment opportunities and facilities for local people such as new schools, healthcare provision and upgraded transport infrastructure. It also identifies areas for protection including open space.

Why do we need an up-to-date Local Plan?

We need to review the plan at least every five years to ensure that it remains up to date and continues to meet our needs for development growth to 2041. Without an up-to-date Local Plan, the Council could have very little influence over the location of new development and the provision of infrastructure. Sites could be promoted for development in locations that the Council and its communities want to protect, and which are not considered sustainable. Not having an up-to-date Local Plan would create uncertainty and make it harder to secure appropriate sites for new infrastructure such as schools and health facilities.

Why are we consulting on Additional Sites now?

During the plan's preparation, it has emerged that we need to add more land for homes and employment use into the plan to meet future needs. This is because some sites in the adopted Local Plan have not come forward and some sites will not be built as quickly as expected. These events, outside the City Council's control, mean we do not have enough allocated housing sites to meet our needs for the first five years of the plan when measured against our housing target.

The additional sites will provide around 1,592 additional homes over the plan period to 2041 and help meet the latest housing needs figure of 1,210 new homes a year. We are also proposing to expand the floorspace of a proposed employment site by 10,500sqm.

Where are the Additional Sites?

The additional sites are located in areas accessible to the local highway network and services and facilities such as schools and local shops. They are:

- On previously developed/brownfield land in Chelmsford City Centre
- On the edge of Chelmsford Urban Area to the north (Newlands Spring area) and north-west (Patching Hall Lane/Scot's Green area)
- Around the villages of Boreham, Great Leighs, Bicknacre, Ford End, East Hanningfield, Rettendon Place and Woodham Ferrers.

How were the Additional Sites chosen?

We have selected the additional sites following detailed testing of site constraints and opportunities in relation to matters like flood risk, heritage, traffic and archaeology. They are also on land being promoted for development and in areas considered sustainable and suitable for the development proposed.

What does the consultation say about the A12 Widening Scheme?

The Government cancelled the A12 widening scheme in July 2025 resulting in uncertainty over the delivery of highways improvements to Junction 19 or Boreham Interchange which is specifically needed to support the growth in the plan.

The consultation document outlines how in the absence of the A12 widening scheme, a phased approach to deliver the Junction 19 improvements is being pursued. The design of the first phase of works to support future growth at Chelmsford Garden Community is agreed with National Highways and Essex County Council and discussions are on-going with Homes England regarding funding and delivery. Discussions are also continuing with key stakeholders to fund and deliver the remaining elements of the Junction 19 works.

What is the Additional Sites Integrated Impact Assessment (IIA) Addendum?

We have updated our Integrated Impact Assessment (IIA) to consider the additional sites and other policy changes. This IIA Addendum assesses sustainability and strategic environmental impacts, Habitats Regulations, and health and equality impacts of the proposals and is also published for consultation alongside the Additional Sites Document.

What has happened to the previous Pre-Submission Local Plan consultation responses from February-March 2025?

The review of the adopted Chelmsford Local Plan commenced in Winter 2021 and following consultations in 2022 and 2024, the Pre-Submission (Regulation 19) version was published for consultation in Spring 2025. We have published a Feedback Report setting out the main issues and changed sought in the comments to the Pre-Submission plan. We will also publish a statement responding to the main issues and changes sought after the Additional Sites consultation.

Do I need to re-submit my comments to the Pre-Submission Local Plan consultation in February-March 2025?

No, comments made to the previous Pre-Submission Local Plan consultation in Spring 2025 will be sent in full to the Inspector, together with a high level Council response, for independent examination. The Council will only be accepting representations that are related solely to the content of the Additional Sites Consultation Document and supporting Integrated Impact Assessment (IIA) Addendum.

Where can I view Additional Sites consultation documents?

You can read the consultation documents in the following ways:

- On the Council's Consultation Portal at www.chelmsford.gov.uk/planningpolicyconsult. This system also allows you to submit comments to the consultations
- On the Council's website alongside the Local Plan evidence base documents at www.chelmsford.gov.uk/lp-review
- At the Chelmsford City Council Customer Service Centre, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford CM1 1JE (10am to 4pm Monday to Friday).

At some staffed drop-in public exhibitions – see later in FAQs for details.

If you do not have access to a computer, you can request paper copies by telephoning (01245) 606330. A charge will be made to cover printing and postage costs.

How can I comment on the Additional Sites consultation documents?

You can comment on the consultation documents in the following ways:

Online Consultation Portal:
Go to: www.chelmsford.gov.uk/planningpolicyconsult where you can:

- Read the consultation documents
- Make your comments via the specially designed representation form
- Sign up for alerts to feedback reports and future consultations

This is our preferred means of receiving comments as it ensures that your comments are recorded accurately and are processed quickly. If you have not used this system before or have any difficulties logging in, please see our guidance notes at:www.chelmsford.gov.uk/lp-portal-guide or call us on (01245) 606330.

In writing:
If you prefer to send comments in writing, please fill in the relevant specially designed representation form.

The Local Plan representation form can be downloaded at www.chelmsford.gov.uk/lp-review. Paper copies of the representation form are also available from Chelmsford City Council's Customer Service Centre (details above) or on request by telephoning (01245) 606330 or emailing planning.policy@chelmsford.gov.uk

Forms can be returned:

- By e-mail to planning.policy@chelmsford.gov.uk

- By post to Planning Policy, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE
- By hand to Chelmsford City Council Customer Service Centre (details above).

If you have difficulties making representations by e-mail or post due to a disability, please call us (01245) 606330.

The use of the Local Plan representation form is strongly recommended as this will ensure that comments are related to the matters relevant to the subsequent independent examination by a Planning Inspector.

Any anonymous comments and late comments received after 4pm on 8 January 2026 cannot be accepted. Individual acknowledgement of receipt will not be possible.

What is 'legal compliance'?

Local Plans are legally compliant if they are:

- Prepared in accordance with the Council's latest Local Development Scheme
- Accompanied by a Sustainability Appraisal and Habitats Regulations Assessment
- Subject to consultation carried out in accordance with the Council's Statement of Community Involvement
- Compliant with all relevant laws including the Planning and Compulsory Purchase Act (PCPA) and the Town and Country Planning (Local Planning) (England) Regulations 2012; and
- Prepared in line with the Duty to Co-operate.

Please read the Statement of Representation Procedure and Statement on Availability for full details about how to make your comments available at www.chelmsford.gov.uk/lp-review.

What is 'soundness'?

Local Plans are considered sound if they are:

- **Positively prepared** – provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common grounds; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

Please read the Statement of Representation Procedure and Statement on Availability for full details about how to make your comments available at www.chelmsford.gov.uk/lp-review.

What is the 'duty to cooperate'?

The Council has a legal duty to cooperate with other national and local bodies, such as neighbouring planning authorities, Essex County Council and National Highways. The purpose of the duty is to discuss and address strategic cross-boundary issues such as housing, employment and infrastructure needs.

The Additional Sites Duty to Co-operate Position Statement provides evidence of ongoing engagement and where agreement has been reached. This Statement is also supported by Statements of Common Ground which are being agreed with organisations. These will be available on the Council's website as they are agreed at www.chelmsford.gov.uk/lp-review.

Where and when are the Local Plan exhibitions?

The Civic Centre drop-in public exhibitions will be staffed and provide an opportunity to meet a planning officer face-to-face. The other exhibitions in High Chelmer Shopping Centre and South Woodham Ferrers Town Council offices will not be staffed – see details below. Please check our website www.chelmsford.gov.uk/lp-review for any updates before making your journey.

Location	Date	Time
Council Chamber, Civic Centre, Duke Street, Chelmsford, CM1 1JE	Thursday 11 December	6pm - 8pm
	Friday 12 December	1pm - 3pm
	Saturday 13 December	10am - 12noon
High Chelmer Shopping Centre, Exchange Way, Chelmsford, CM1 1XB	Monday 1 December to Monday 8 December	Unstaffed exhibition panels displayed all-day during shopping centre opening hours
South Woodham Ferrers Town Council, Champions Manor Hall, Hullbridge Road, South Woodham Ferrers, CM3 5LJ	Wednesday 3 December to Wednesday 10 December	Unstaffed exhibition panels displayed 9am - 4pm weekdays, Saturday 9am – 3:30pm, Sunday closed

You can also view the exhibition online at www.chelmsford.gov.uk/lp-review.

What is the evidence base?

National policy requires the Council to ensure that its Local Plan is based on appropriate up-to-date evidence about economic, social and environmental characteristics and prospects of Chelmsford. The evidence base comprises studies and working with key stakeholders and groups across the City area.
More recently completed evidence base used to inform the Additional Sites Document includes:

- Review of the Air Quality Impact Assessment

- Landscape Sensitivity and Capacity Study
- Detailed Water Cycle Study Addendum
- Highways Impact Junction Modelling
- Heritage Impact Assessment
- Updated Strategic Housing and Employment Land Availability Assessment (SHELAA)
- Archaeological Impact Assessment
- Additional Housing Site Studies
- Level 2 Strategic Flood Risk Assessment Addendum and site summary tables and maps, and
- Sequential and Exception Testing Update.

These evidence base documents are available online via www.chelmsford.gov.uk/lp-review.

What weight does the Additional Sites Document have in decision making?

The Additional Sites Document indicates the Council's intent to address future growth requirements in Chelmsford in the period to 2041 and beyond in a planned and sustainable way. At this stage it will be of 'moderate' weight in decision making on planning applications. It will not have full Development Plan status until it has been adopted by the Council. At this point the new Plan would also replace the current adopted plan.

What happens after the Additional Sites Local Plan consultation?

We will acknowledge all 'duly made' comments received, although we cannot write to you about your individual comments. Comments will be published on the Council's planning policy consultation portal in accordance with the Data Protection Act.

The Council will produce a Feedback Report summarising the main issues raised in the consultation responses. We will then submit both the Pre-Submission version of the Local Plan published for consultation in Spring 2025 and the Additional Sites Document for examination by an independent Planning Inspector. Comments submitted to both consultations will also be submitted in full alongside a statement with a high level council response to the main issues raised in both consultations.

There is no need to resubmit representations submitted as part of the previous Pre-Submission consultation. The Pre-Submission Local Plan and the Additional Sites Document will be incorporated together in a single new Local Plan before being finalised for adoption.

How can I be kept up to date on progress?

We have a specially designed consultation portal for Local Plan and other planning policy consultations. If you register, you can:

- Read and save consultation documents
- Make your comments online
- Receive alerts on future consultations

You can find out more about how to use the consultation portal online at www.chelmsford.gov.uk/lp-portal-guide

You can also sign up to the Chelmsford City Life mailing list, to receive news updates.

What are the key stages for the Local Plan review?

Issues and Options – Previous stage
This was the first stage of consultation which took place in August to October 2022.

Preferred Options – Previous stage
This was the second stage of consultation which took place in May to June 2024.

Pre-Submission – Previous stage
This was the third stage of consultation which took place in February to March 2025.

Focused Additional Sites - *Current stage*
This is a focused public consultation on additional housing and employment site allocations before we submit the plan for examination by a government-appointed independent Planning Inspector. The consultation will gather views on legal compliance and soundness.

Submission – Future stage (Mid-2026)
This is the formal submission of the Local Plan. All Plan documents, evidence, and comments received to the Pre-Submission and Additional Sites consultation stages will be submitted to the appointed Planning Inspector for the examination.

Examination – Future stage (Late 2026)
Public hearings will be held. The Inspector will use the comments received to the Pre-Submission and Additional Sites consultation stages to decide what matters to discuss.

Adoption – Future stage (Late 2026/Early 2027)
The new Local Plan is formally adopted by the Council, replacing the existing plan adopted in 2020.

Planning Policy Team
Spatial Planning Services
20 November 2025
01245 606330
planning.policy@chelmsford.gov.uk



Local Plan Focused consultation

Comms & Marketing Campaign

November 2025 – January 2026

Chelmsford City Council

Local Plan Focused Consultation

Marketing & comms overview

*able to measure direct impact

Method	**Potential reach**	**Total cost** (to date)	**Reach cost** (per potential household / person)
Print: magazine ad	Total 6,500 distribution	£282.00	0.04p
*Email campaigns	15,900	FOC	£0
*Social: Facebook organic #1	11,235 reach	FOC	£0
*Social: Facebook organic #2	35,979K reach	FOC	£0
*Social: Facebook organic #	29,403K reach	FOC	£0
*Social: Facebook paid ad #1	14,340 reach	£117.61	0.19p (cost per link click)
*Social: Facebook paid ad #2	18,039 reach	£92.30	0.13p (cost per link click)
*Website: Local Plan page	5,274 page views	FOC	£0
*City Life articles	710 page views	FOC	£0
Clear channel digital screens	Approx 34,500 displays	FOC	£0
Brightsign CCC venue digital screens	Approx 5,100 daily	FOC	£0

Chelmsford City Council

Local Plan Focused Consultation

Print Ads - Magazines

A full-page magazine advert was booked for the campaign:
Total cost: £282 (incl VAT)
Potential total reach: 6.5K
Cost per potential person reached: £0.04p

Publication	Details	Issue date	Circulation
South Woodham Focus https://focuspp.com/the-focus-south-woodham-edition/	A4 full colour 24pp	December 2025	**6.5K (monthly)** Available to pick up at 9 different collection points across South Woodham Ferrers

Local Plan Focused Consultation

Print Advert - Magazine





https://focus-magazine.co.uk/

South Woodham Focus (free magazine)

December 2025 edition

Local Plan Focused Consultation

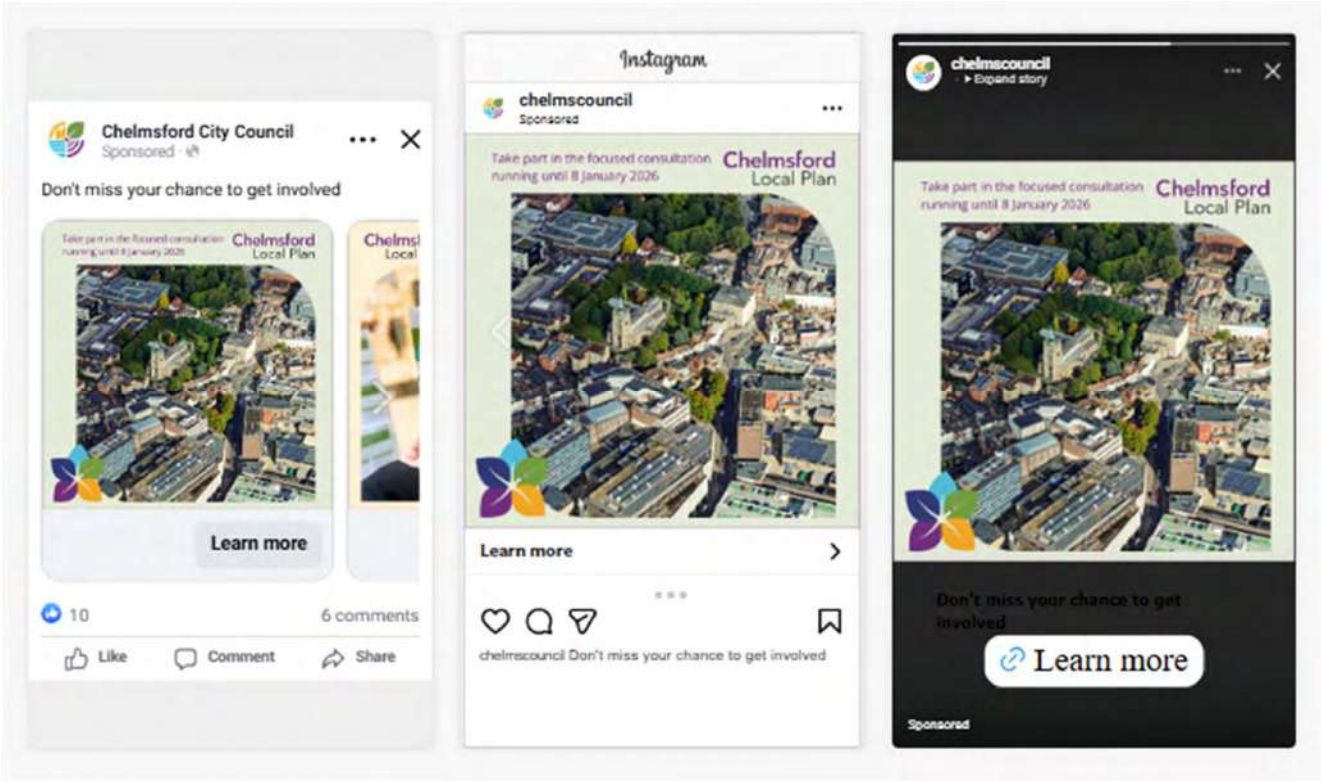
Meta paid ad #1 01 Dec - 13 Dec

Account stats	Jan 2026
Followers	15.9K

@chelmscouncil

Engagement stats	
Post comments	6
Post reactions	10

Stats 10 – 17 Feb 2025	
Total reach	**14,340**
Impressions	34,132
Link clicks	619
Median cost per link click	£0.19
Total cost	**£117.61**



- **Reach**: The number of users who've seen your content.
- **Impressions**: The total number of times your ad has been seen.
- **Clicks**: The number of times users have clicked on your ad.
- **Engagement/interactions**: The collective number of likes, comments, and shares your ad has received.

Chelmsford City Council

Local Plan Focused Consultation

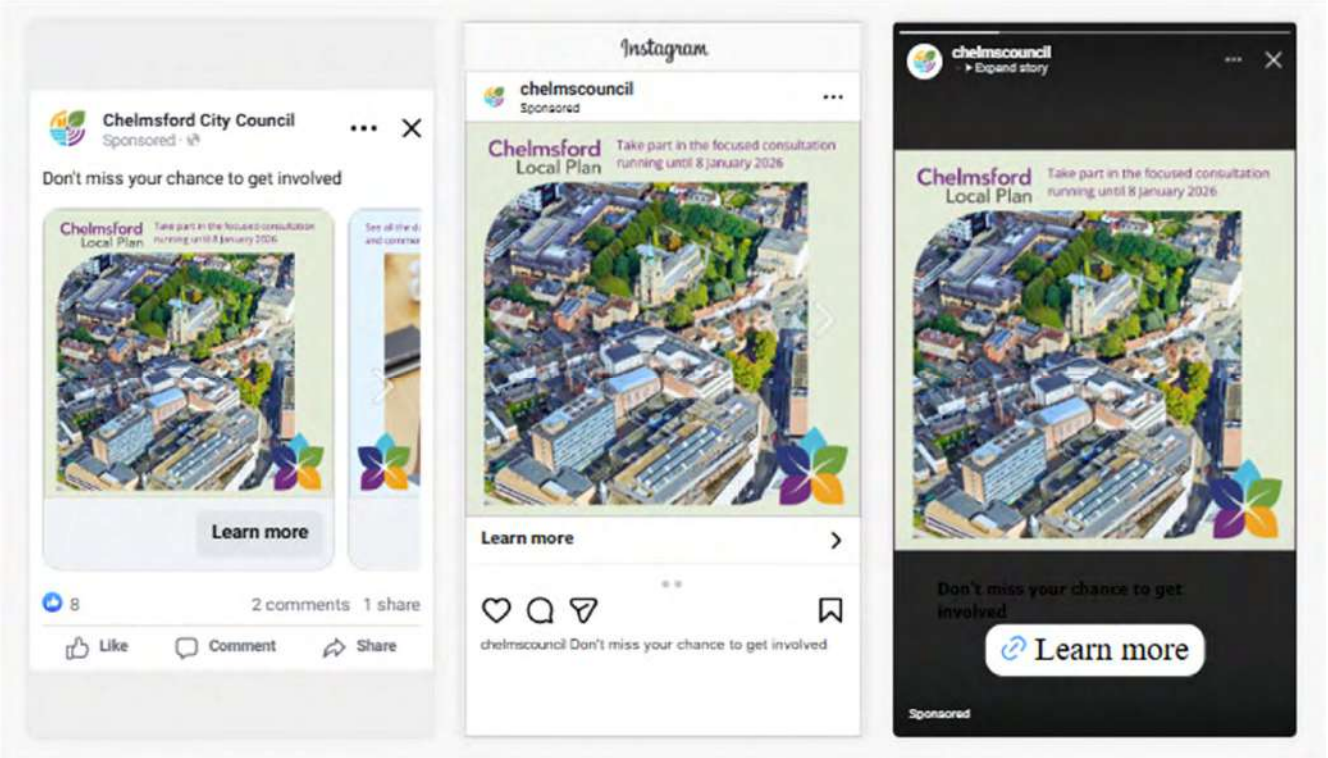
Meta paid ad #2 04 - 08 Jan

Account stats	Jan 2026
Followers	15.9K

@chelmscouncil

Account stats	
Post comments	2
Post reactions	8

Stats 10 – 18 March 2025	
Total reach	**18,039**
Impressions	34,236
Link clicks	710
Median cost per link click	£0.13p
Total cost	**£92.30**

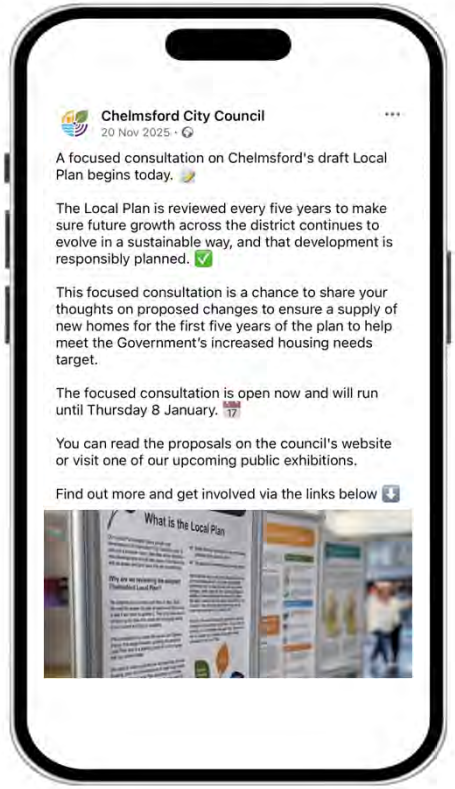


- **Reach**: The number of users who've seen your content.
- **Impressions**: The total number of times your ad has been seen.
- **Clicks**: The number of times users have clicked on your ad.
- **Engagement/interactions**: The collective number of likes, comments, and shares your ad has received.

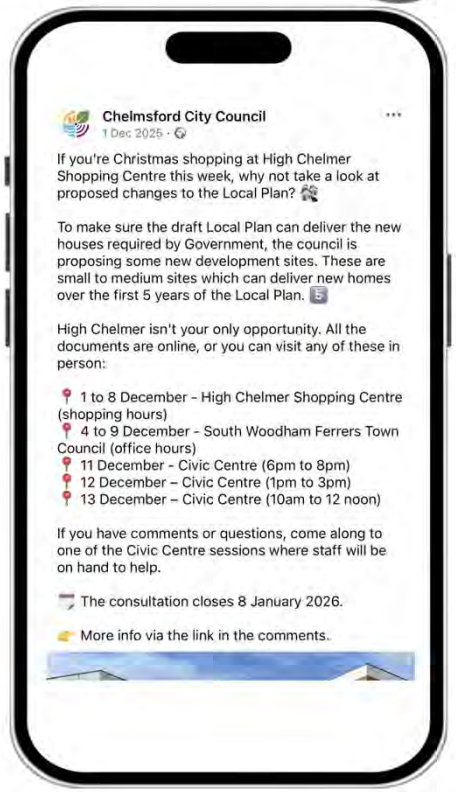
Chelmsford City Council

Local Plan Focused Consultation

Facebook organic posts @chelmscouncil



Key post stats	20 Nov 2025
Views	**11,235**
• Reactions	10
• Comments	2
• Shares	7



Key post stats	1 Dec 2025
Views	**35,979**
• Reactions	29
• Comments	38
• Shares	6



Key post stats	6 Jan 2026
Views	**29,403**
• Reactions	14
• Comments	70
• Shares	4

Account stats	Jan 2026
Followers	**15.9K**

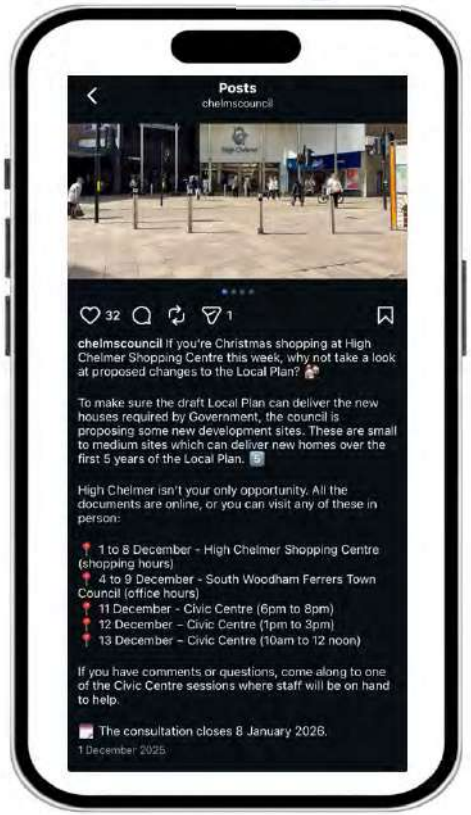
- **Views**: The number **of times the post was displayed.**
- **Impressions**: The total number of times your ad has been seen.
- **Engagement/interactions**: The collective number of likes, comments, and shares your ad has received.

Chelmsford City Council

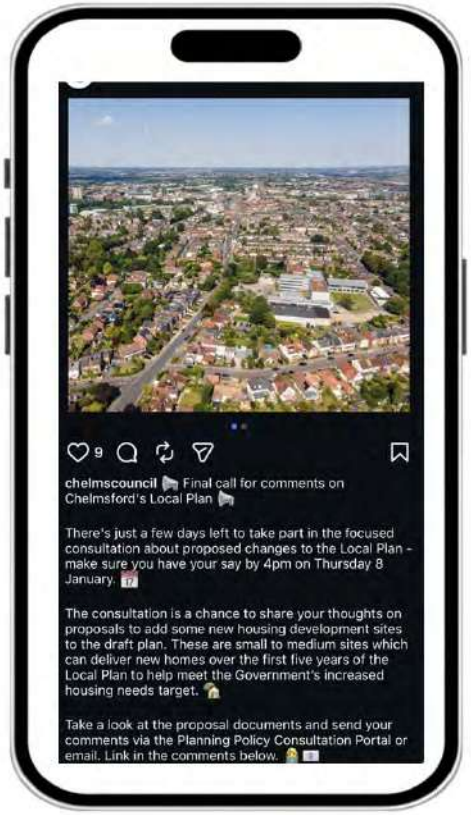
Local Plan Focused Consultation
Instagram organic posts @chelmscouncil



Key post stats	20 Nov 2025
Total reach	**263**
• Likes	3
• Comments	0
• Saves	1



Key post stats	1 Dec 2025
Total reach	**1,286**
• Likes	32
• Comments	0
• Saves	1



Key post stats	2 Jan 2026
Total reach	**635**
• Likes	9
• Comments	0
• Saves	0

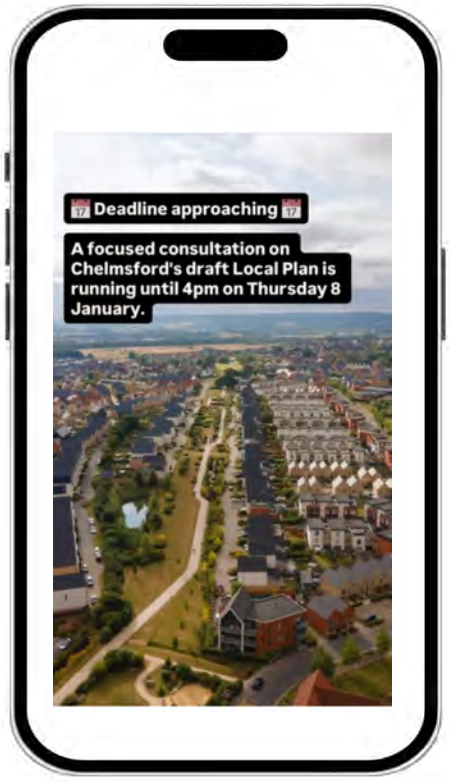
Account stats	Jan 2026
Followers	4.3K

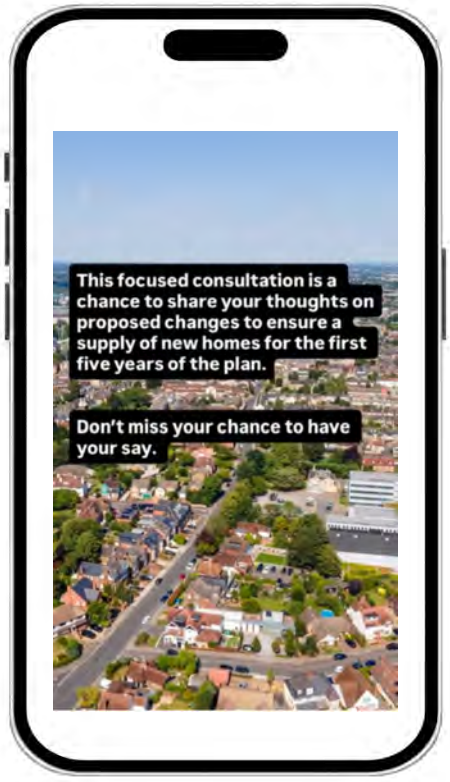
- **Reach**: The numbe**r of users who've seen your content.**
- **Likes**: The total number of likes your post has received.
- **Comments**: The number of comments people have made on your post.
- **Saves**: the number of accounts that have saved your post.

Local Plan Focused Consultation
Facebook/Instagram stories

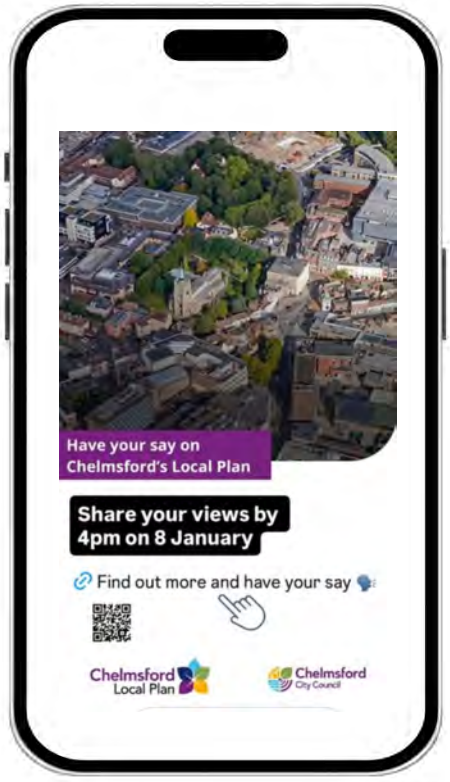


11 Dec 2025





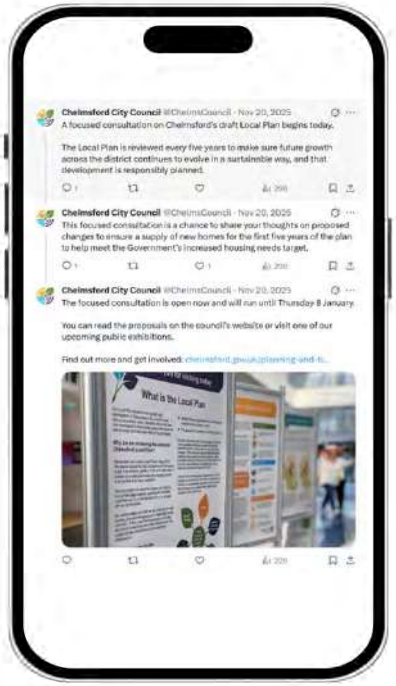
6 Jan 2026



Chelmsford City Council

Local Plan Focused Consultation
X (Twitter) organic posts
@chelmscouncil

Account stats	
Followers	17.6K



20 Nov 2025

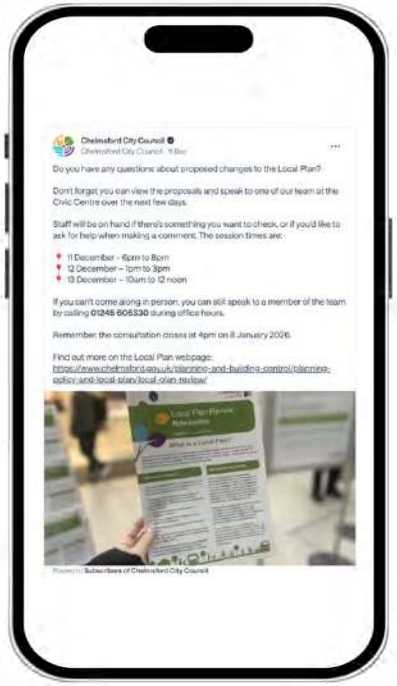
- 296 impressions
- 1 engagement
- 0 comments

Local Plan Focused Consultation
Nextdoor organic posts
Chelmsford City Council



20 Nov 2025

- 856 impressions
- 1 engagements
- 2 replies



11 Dec 2025

- 795 impressions
- 0 engagement
- 0 replies



4 Jan 2026

- 900 impressions
- 0 engagements
- 0 replies

Account Stats

- **Members:** 37,490 and **Claimed households:** 27,770 (households with at least one confirmed member)

Campaign Stats

- **Impression Count:** Number of views for our post
- **Thank Count:** Number of reactions (like, heart, etc.) on our post
- **Reply Count:** Number of comments on the post

Chelmsford City Council

Local Plan Focused Consultation

Email campaigns

	Email	Date	Sent to	Displays/opens	Relevant link clicks
1	**City Life** Item: Preparing for new Local Plan consultation on additional sites	14/11/2025	10,924	46.82%	105 for item
2	**City Life** Item: Visit Chelmsford's Local Plan exhibitions	28/11/2025	10,937	54.83%	23 for item
3	**Local Plan special** Have your say on Chelmsford's Local Plan	04/12/2025	10,993	47.16%	131 for bulletin
4	**Invest Chelmsford Business special** Have your say on Chelmsford's future	11/12/2025	4,934	38.35%	55 for bulletin

Average rates for Local Authorities on e-shot

- Displays/opens = 40.6%

Local Plan Focused Consultation

Email campaigns

	Email	Date	Sent to	Displays/opens	Relevant link clicks
5	**Local Plan special reminder** Don't forget to have your say on Chelmsford's Local Plan	06/01/2026	4,994	55.24%	390 for bulletin

Average rates for Local Authorities on e-shot

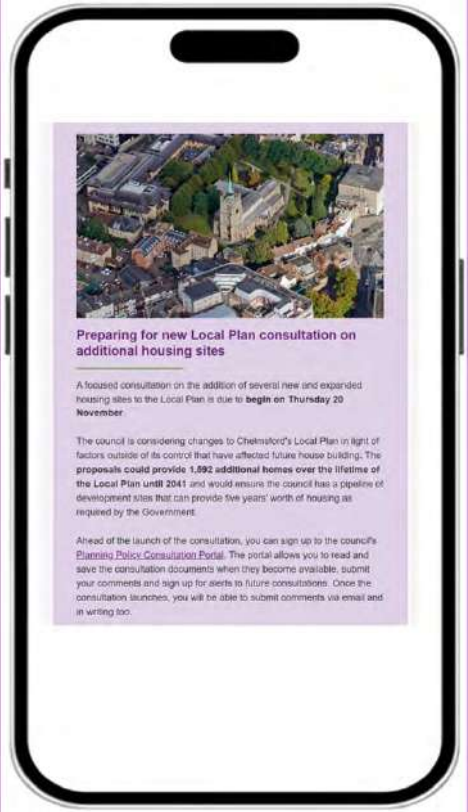
- Displays/opens = 40.6%

Local Plan Focused Consultation

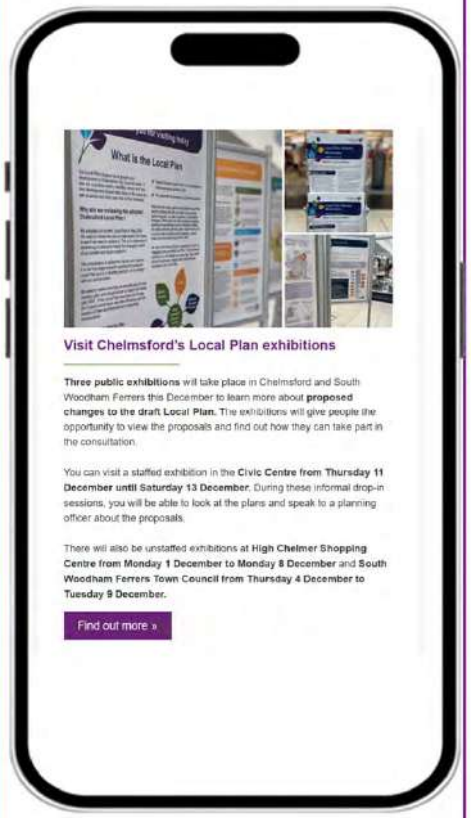
Email campaigns

e-shot

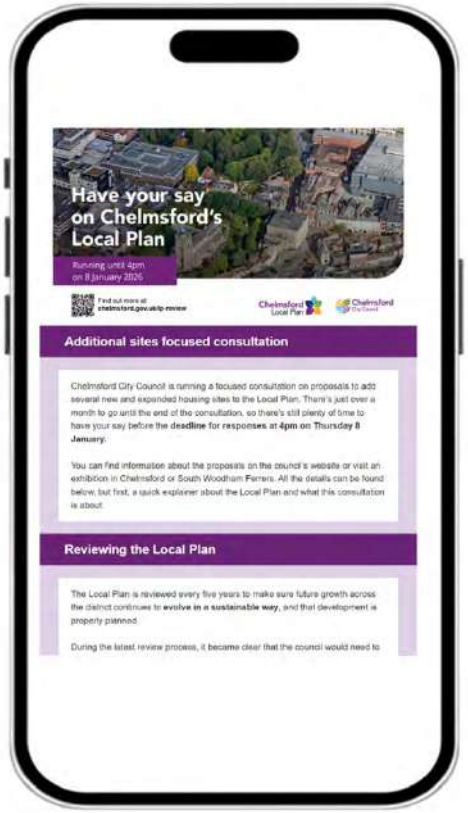
1



2



3



4

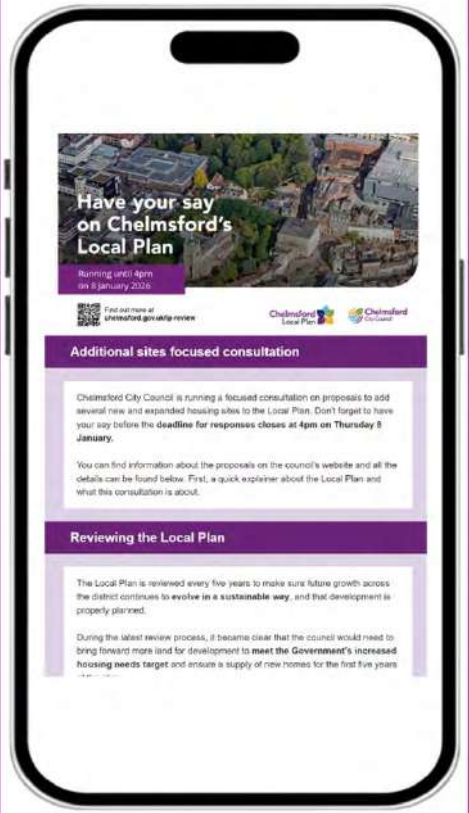


Chelmsford City Council

Local Plan Focused Consultation

Email campaigns

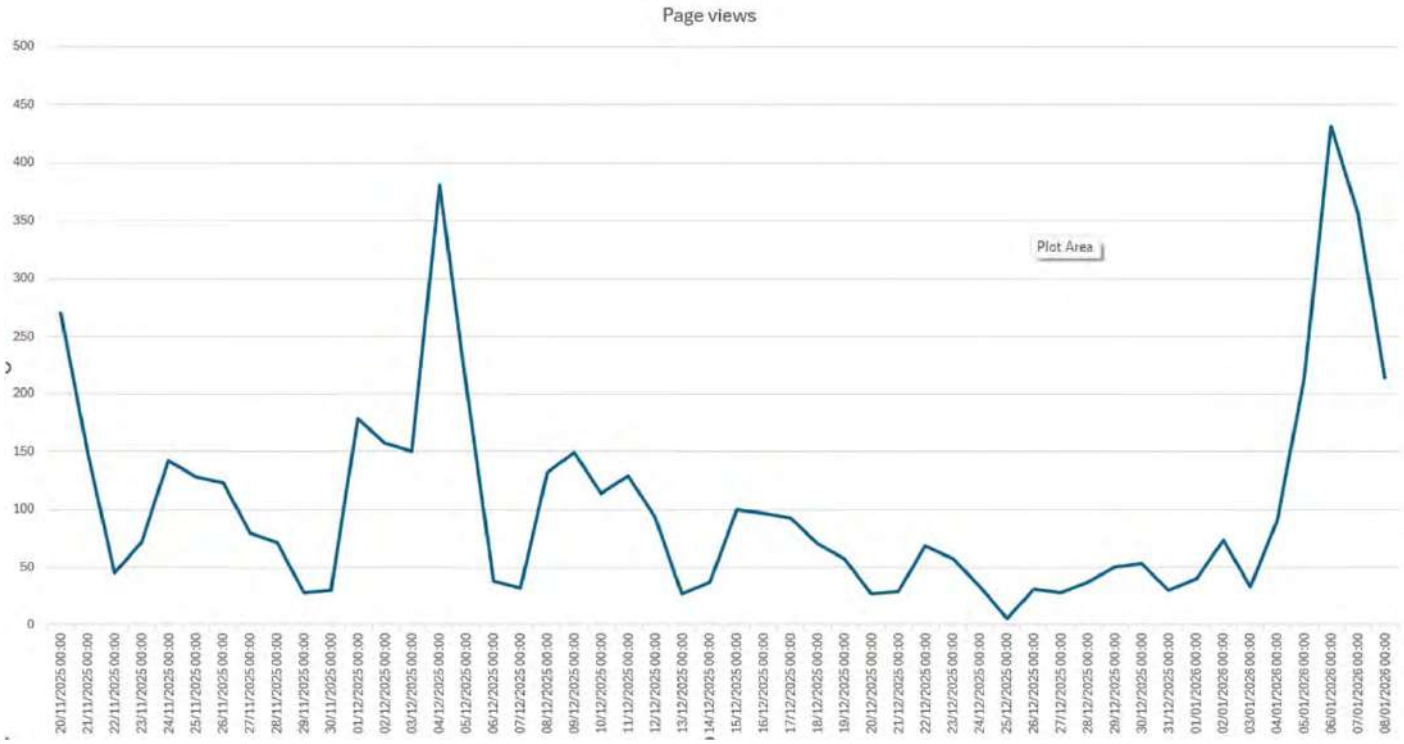
5



Local Plan Focused Consultation

Corporate website

Page views for: https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-local-plan/local-plan-review



Local Plan Focused Consultation

City Life website

	Title	Date	URL	Visits	Page Views	Unique visitors
1	**Focused consultation on Chelmsford's Local Plan to begin**	20/11/2025	https://citylife.chelmsford.gov.uk/posts/focused-consultation-on-chelmsford-s-local-plan-to-begin	256	298	231
2	**Exhibitions to open as part of Chelmsford's Local Plan review**	26/11/2025	https://citylife.chelmsford.gov.uk/posts/exhibitions-to-open-as-part-of-chelmsford-s-local-plan-review	266	307	219
3	**Final opportunity to take part in Chelmsford's Local Plan consultation**	02/01/2026	Final opportunity to take part in Chelmsford's Local Plan consultation City Life	105	114	90

- **Unique visitors:** The total number of unique visitors during the selected period.
- **Page views:** Total number of times a page is loaded, including multiple reloads by the same user.
- **Visits:** Number of unique interactions with a page.

Chelmsford City Council

Local Plan Focused Consultation

City Life website

Focused consultation on Chelmsford's Local Plan to begin

By **Corporate Communications**

20 November 2025 local plan consultation



A focused consultation on the addition of several new and expanded housing and employment sites to the Local Plan is being launched by Chelmsford City Council.

The consultation will run from Thursday 20 November until Thursday 8 January. It gives residents the opportunity to review and comment on revisions to the Local Plan that have had to be made in response to several significant events which affect future housebuilding in Chelmsford. These include:

- The Government cancelling the A12 widening scheme.
- Three key development sites having either stalled or been significantly delayed.
- Other developers slowing down their build rates.

1

News

Exhibitions to open as part of Chelmsford's Local Plan review

By **Corporate Communications**

26 November 2025 local plan consultation planning



Residents will be able to visit one of three public exhibitions in Chelmsford and South Woodham Ferrers next month to learn more about proposed changes to the draft Local Plan.

The exhibitions will give people the opportunity to consider proposals by Chelmsford City Council to add several new and expanded development sites to the draft Local Plan and find out how they can take part in the consultation.

2

Final opportunity to take part in Chelmsford's Local Plan consultation

By **Corporate Communications**

3 January 2026 local plan

There's still time to have your say before the focused consultation closes at 4pm on Thursday 8 January.



Help shape development in Chelmsford

The Local Plan is a long-term strategy guiding Chelmsford's growth. It sets out policies on where homes and businesses will be located, what infrastructure is needed and how to protect and enhance green spaces. A clear, up-to-date plan helps Chelmsford to remain a vibrant place to live.

3

Chelmsford City Council

Local Plan Focused Consultation

Press coverage

Publication/title	URL	Date
Essex Live: The 15 areas across Chelmsford 1,100 homes could be built	https://www.essexlive.news/news/essex-news/15-areas-across-chelmsford-1100-10631444	10/11/2025
Essex Chronicle: Consultation over housing sites	No link available (print only)	04/12//2025

Local Plan Focused Consultation

Clear Channel Digital Screens

Clear Channel digital screens in Chelmsford (FOC)

These cover a range of bus stops in the city centre



Ads ran from 04/12/2025 until 7/01/2026

- The ads were shown on rotation for the duration of the hours scheduled
- There were approximately 34,500 plays of this ad across 7 screens, including: Parkway (B&M), Parkway Flyover, Waterhouse Lane, Springfield Road, Rainsford Lane, Moulsham Street (Junction with London Road)

Buses cater to people of all ages, professions, and backgrounds, making bus shelters an ideal medium to reach a broad captive target audience. The ads are also visible to passing audience/traffic.

Research suggests that people are more likely to remember ads they've seen on a digital screen compared to static posters or banners.

Chelmsford City Council

Local Plan Focused Consultation

Digital screens in CCC venues

27 x screens on the Brightsign network (FOC)

- 25 screens across 3 leisure centres
- 2 screens (Sandon & Chelmer Valley) at Park & Ride

Local Plan consultation ads were shown on the following CCC venue screens between 04 Dec – 07 Jan:

- Riverside Leisure Centre
- South Woodham Ferrers Leisure Centre
- Chelmsford Sport and Athletics Centre
- Park & Ride screens

Chelmsford City Council



Appendix 2: Essex Highways Local Plan Additional Sites – Response to Representations (March 2026)

Document Control Sheet

Essex Highways
Transport Planning
Victoria House
Chelmsford
CM1 1JR
W www.essex.gov.uk/highways

Project Number	B3553RA4
Status	Draft
Revision	2
Control Date	18th March 2026

Record of Issue

Issue	Status	Author	Date	Check	Date	Review	Date
1	Final	JW	18/03/26	SP	23/04/26	SP	23/04/26

Approved for Issue By	Date
KS	27/04/26

Distribution

Organisation	Contact	Number of Copies
Essex County Council	HN	Electronic
Chelmsford City Council	LP	Electronic

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The following table summarises transport comments raised in representations to the Chelmsford Local Plan Focused Consultation on Additional Sites (Regulation 19) which closed in January 2026. The table also provides a focused response to each representation with input from Chelmsford City Council (CCC) and Essex County Council (ECC) to address matters related to Local Plan and wider development planning policy.

Table Item ID	Summary of Representation	Detailed representation made	Response
Comment by: Alan and Jennifer Swash (C1360942) – Reference: AS-1061			
1.	**No traffic modelling of the Waltham Road/Main Road (B1137) junction** Comments in relation to Strategic Growth Site 9a (Waltham Road Employment Area, Boreham – 14,000 m^2)	No detailed traffic modelling of the Waltham Road/Main Road (B1137) junction has taken place. The VISUM model assigns 33 (AM) and 23 (PM) traffic movements from an additional 10,500m^2 Waltham Road Industrial Estate, despite the Plan's proposal for 14,000m^2 (underestimated by up to 40%). The junction is also likely to see increases of traffic from the significant developments in Great Leighs and southern Braintree.	For the 'Additional Sites (Regulation 19) Highways Impact Junction Modelling Appraisal technical note, October 2025' (T007), 10,500m^2 of employment was modelled in addition to the 3,500m^2 already present in the Pre-Submission allocation and associated modelling (T006-A refers). Therefore 14,000m^2 was modelled in totality. As documented in the Essex Highways' 'Additional Sites (Regulation 19) Highways Impact Junction Modelling Appraisal technical note, October 2025' (T007), junctions along the B1137 Main Road potentially impacted by Local Plan development in Boreham (Growth Area 2), were not prioritised within the scope of junction modelling, owing to the small volume of development trips calculated to/from the proposed sites (relative to other sites under consideration in the Pre-Submission Local Plan) and their anticipated collective impact on the strategic road network. Strategic Policy S9 – Infrastructure Requirements, paragraph 6.91 in the Pre-Submission Local Plan states that more detailed analysis of traffic impacts and mitigation options testing will be required

Table Item ID	Summary of Representation	Detailed representation made	Response
			through the preparation of Transport Assessments/Statements as part of future planning applications. This will be applicable to developments in Boreham and their impact on local junctions along B1137 Main Road in particular. The Highways Authority will then have a further opportunity to review and assess the impact of development traffic to ensure that sufficient mitigation is provided. There is an expectation that phase 1a of the Chelmsford North-East Bypass, once constructed, will improve network resilience in the future to help manage vehicle trips from Great Leighs and Braintree routing via Waltham Road. CCC have considered cross boundary impacts and continue to work with neighbouring authorities, including Braintree District Council in relation to their Local Plans and the impact on the Chelmsford administrative area.
Comment by: Ben Heaysman (1392881) – Reference: AS-2			
2.	**Congestion, Safety and Accessibility along Main Road, Boreham** Comments in relation to Growth Site 9c (South of Main Road and Dukes Wood	No assessment has been published to demonstrate that a new access onto Main Road can be delivered safely in line with NPPF paragraphs 110 and 112 or Local Plan Policy DM27. Various factors, such as the single carriageway, high traffic flows and speeds, access points with blind exits, and a bus route, indicate otherwise. Large vehicles, including emergency services, face difficulty navigating this part of Main Road. Their access,	Strategic Policy S9 – Infrastructure Requirements, paragraph 6.91 of the Pre-Submission Local Plan states that more detailed analysis of traffic impacts and mitigation options testing will be required through the preparation of Transport Assessments/Statements as part of future planning applications. The Highways Authority will then have a further opportunity to review and

Table Item ID	Summary of Representation	Detailed representation made	Response
	Close, Boreham – 22 dwellings)	despite this being a specialist residential scheme, has not been evidenced with no Transport Assessment, Road Safety Audit, speed survey, junction modelling or swept path analysis provided.	assess the impact of development traffic to ensure that sufficient mitigation is provided. Where necessary, this would include a Road Safety Audit, speed survey, junction modelling and swept path analysis for larger vehicles such as HGV's. Site policy SGS9c requires development proposals to accord with a Planning Brief produced by CCC. Site policy requirements include the need for appropriate measures to promote and enhance active and sustainable modes, which includes public transport. These will be identified as part of a Transport Assessment, which is required by the City Council to inform any future planning application as set out in the Local Validation Checklist and referenced in paragraph 1.44 of the Pre-Submission Plan. Further details are also provided in the ECC Developers' Guide to Infrastructure Contributions (2024). Any future requirements for the site must comply with statutory tests of being necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. Any development access arrangements would need to be compliant with highway design regulations and go through appropriate Road Safety Audits, as required by ECC Development Management Policies (2011) DM14 – Safety Audits.

Table Item ID	Summary of Representation	Detailed representation made	Response
			This would be undertaken at the planning application stage by an independent safety auditor and reviewed by ECC, as the highway authority, as part of any planning application.
Comment by: Boreham Conservation Society (963966) – Reference: AS-1022, AS-1032 and AS-1024			
3.	Comments in relation to Strategic Growth Site 9a (Waltham Road Employment Area, Boreham – 14,000m^2 of employment space), Growth Site 9b (Land to the East of 118 to 124 Plantation Road, Boreham) – 60 dwellings, and Growth Site 9c (South of Main Road and Dukes Wood Close, Boreham –22 dwellings)	**Site 9a** • Findings from National Highways' appraisal of A12 Widening proposals, detailing the traffic impact on junctions in Boreham, should be acknowledged in the Local Plan appraisal, as they are based on the most up to date modelling • Safety implications of rat-running along Waltham Road will be amplified with an increase in traffic from surrounding developments • Poor visibility from Site 9a • Safety hazards increased with Essex police vehicles being dispatched from Holts Lane • No footways to Waltham Rd site and lack of sustainable transport provision encourages vehicle trips. **Site 9b and 9c** • Access to Site 9b is in the vicinity of a blind bend on Plantation Road • Traffic would be unable to leave Site 9b in peak periods due to tailback of traffic queuing to access Main Road • Request two sites share one access off Main Road but that if the two sites were to be unified, vehicle	**Sites 9a, 9b, 9c** Strategic Policy S9 – Infrastructure Requirements, paragraph 6.91 of the Pre-Submission Local Plan states that more detailed analysis of traffic impacts, visibility splays and other safety implications and mitigation options testing will be required through the preparation of Transport Assessments/Statements as part of future planning applications, but there are no overriding safety concerns identified at this stage. This will be applicable to developments in Boreham and their impact on local junctions along B1137 Main Road in particular. The Highways Authority will then have a further opportunity to review and assess the impact of development traffic to ensure that sufficient mitigation is provided. The Boreham Neighbourhood Plan has been subject to a Regulation 16 consultation. Policy 10 Main Road and other roads in Boreham states that development proposals should endeavour to improve connectivity across Main Rd through reducing/minimising through traffic on Main Road, providing on-site measures, or providing financial

Table Item ID	Summary of Representation	Detailed representation made	Response
		access onto Plantation Road must not be permitted in any circumstances, as Plantation Road traffic would be tempted to cut through the sites 9b and 9c to access Main Road • Reduction in speed limit and traffic calming still sought in the village • Improvements to footways are needed to aid sustainable access to the sites.	contributions, towards reducing the physical scale of Main Road. Potential measures include reducing the width of the carriageway and removing the central islands; creating a dedicated cycle way to the south-east side to link up with the existing cycleway from the A12 Junction 19 (Boreham Interchange); and installing traffic calming measures along the route such as mini roundabouts, pedestrian crossing facilities and lowering the speed limit to 30mph. Site policies 9a to c require more detailed development proposals to accord with a Planning Brief produced by CCC. Once the Neighbourhood Plan is 'made' and forms part of the Development Plan for Chelmsford any Transport Assessment/Statement, will be required to have regard to the measures set out in Policy 10 where they are consistent with the statutory tests of being necessary to make the development acceptable in planning and highways terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. Any proposals will also need to be compliant with highway design regulations and go through appropriate Road Safety Audits, as required by ECC Development Management Policies (2011) DM14 – Safety Audits. This would be undertaken at the planning application stage by an independent safety auditor and reviewed by ECC, as the highway authority, as part of any planning application.

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			Site 9a (specific) The junction of Waltham Road and Main Road in Boreham was modelled as part of the Local Plan Pre-Submission appraisal, with findings documented in the following evidence base document: 'Transport Impact Appraisal of Local Plan Review Pre-Submission, July 2025 Update', Essex Highways (T006-A). Modelling suggests that the junction will operate close to capacity at peak times – albeit with limited spare capacity assuming a flatter profile of trips across the peak hours. The junction was not prioritised within the scope of modelling for the Local Plan Regulation 19 assessment of Additional Sites, owing to the small volume of development trips calculated to/from the proposed sites in Boreham (relative to other sites under consideration in the Local Plan Pre-Submission) and their anticipated cumulative impact on the strategic road network. It was therefore determined that overall conclusions around the forecast capacity of the Waltham Road/Main Road junction would change little from the previous assessment. Strategic modelling indicates that 'rat-running' along Waltham Road would likely lessen with the provision of phase 1a of the Chelmsford NE Bypass and capacity improvements at the A12 Junction 19 - Boreham Interchange and adjacent junctions.

Table Item ID	Summary of Representation	Detailed representation made	Response
			This will help offset the growth in local development trips from sites in Boreham. Any planning application would be required to consider and make appropriate improvements to footway and/or cycleway provision along Waltham Road from the site to bus stops on Main Road, including appropriate crossing points, in addition to the vicinity of the site. The detail and design of any improvements would be assessed at the planning application stage, and would need to be consistent with the statutory tests of being necessary to make the development acceptable in planning and highway terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. **Site 9b and 9c (specific)** The Additional Sites consultation allocated an additional 82 homes (Sites GS9b and GS9c) for specialist accommodation for older persons, which are expected to generate minimal additional trip movements in the busiest peak hours. Access arrangements to/from Sites 9b and 9c, and any other necessary footway improvements, will be assessed and agreed with developers at the planning application stage, with due consideration paid to local traffic conditions.
Comment by: Kannan Rajesparan (1392958) – Reference: AS-366			
4.	**Traffic modelling is inconsistent with**	The traffic modelling is not concordant with what is experienced by residents and does not consider the lack	Whilst traffic impact modelling is undertaken at a largely strategic scale for the Local Plan appraisal,

Table Item ID	Summary of Representation	Detailed representation made	Response
	that seen on the ground and does not account for the inadequate public transport or pedestrians and cyclists Comments in relation to Strategic Growth Site 19 (Land West of Patching Hall Lane – 200 dwellings)	of public transport in the area, or the use of the road by pedestrians and cyclists. The safety implications on the latter are of particular concern given the large number of students that use Patching Hall Lane. Developments should consider the use of Chignal Road and Hollow Lane for access/egress as Patching Hall Lane and School Lane experience queuing in peak hours. Irrespective of development, further traffic calming measures are required on Patching Hall Lane, to prevent through traffic in a residential area.	as stated in Strategic Policy S9 – Infrastructure Requirements, paragraph 6.91 in the Pre-Submission Local Plan, more detailed analysis of traffic impacts and mitigation options testing will be required through the preparation of Transport Assessments/Statements as part of future planning applications. The Highways Authority will then have a further opportunity to review and assess the impact of development traffic to ensure that sufficient mitigation is provided. The requirement for safe and convenient pedestrian and cycle connections is a policy requirement for this site and paragraph 2.32 requires opportunities for active and sustainable modes to be maximised by providing safe and convenient pedestrian and cycle connections within the sites, with links into the wider network. These will be considered as part of the future masterplan and planning application for this site. Cycling routes will be required to be consistent with LTN 1/20, which requires cycle infrastructure to be safe, and perceived to be safe, to encourage the uptake of cycling (LTN 1/20 paragraph 4.2.9).
Comment by: Helen Fitch (1097387) – Reference: AS-451 and AS-452			
5.	**Inadequate transport infrastructure to support development** Comments in relation to Strategic Growth	New active travel connections near the development may be achievable, however, public transport in the area is infrequent and unreliable and did not improve with the Hollow Lane development (~280 homes), with services worsening over the past five years. Therefore, it is unlikely public transport services would improve. This, coupled	Capacity modelling undertaken for the Local Plan Review appraisal acknowledges that the Roxwell Road/Chignal Road junction will likely approach, but not exceed, capacity by 2041.

Table Item ID	Summary of Representation	Detailed representation made	Response
	Site 18a (Land Northwest of Chelmsford [North of Hollow Lane] – 100 dwellings) and Strategic Growth Site 19 (Land West of Patching Hall Lane – 200 dwellings)	with the lack of employment centres in the area means most journeys are likely to be taken by car. The Roxwell Road/Chignal Road junction will be impacted by the 800 homes to the north of Roxwell Road in the Adopted Local Plan and would therefore be insufficient to cope with traffic from additional developments. Focus on local junctions does not address the wider impacts of the developments and despite references to improvements being made to the road network, there is little or no scope to 'improve' key routes near the sites.	Strategic modelling was not undertaken to appraise the traffic impact of the additional sites proposed in north-west Chelmsford, as it was determined that peak hour trips to/from these developments would be insufficient to impact key corridor routes in Chelmsford in the strategic model, with traffic reassignment shown to dissipate the impact of development trips across the wider network. Focus was therefore placed on assessing local junction impact at key locations along the A1060 Roxwell Road and B1008 Main Road, Broomfield. While traffic impact modelling is undertaken at a largely strategic scale for the Local Plan appraisal, as stated in Strategic Policy S9 – Infrastructure Requirements, paragraph 6.91 in the Pre-Submission Local Plan, more detailed analysis of traffic impacts and mitigation options testing will be required through the preparation of Transport Assessments/Statements as part of future planning applications. The Highways Authority will then have a further opportunity to review and assess the impact of development traffic to ensure that sufficient mitigation is provided. Site policies SGS18a and SGS19 require development proposals to accord with a masterplan to be approved by CCC. Both sites include the policy requirement for appropriate measures to promote and enhance active and sustainable modes, which includes public transport, as part of the sites infrastructure improvements. These will be identified as part of

Table Item ID	Summary of Representation	Detailed representation made	Response
			the individual Transport Assessments for these sites, which are required by the City Council and the Highways Authority to inform any future planning application as set out in the Local Validation Checklist and referenced in paragraph 1.44 of the Pre-Submission Plan. Further details are also provided in the ECC Developers' Guide to Infrastructure Contributions (2024). Any future requirements for the site have to comply with statutory tests of being necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.
Comment by: Anna Barrett (1397010) – Reference: AS-113			
6.	**B1008 Congestion and Safety** Comments in relation to Strategic Growth Site 19 (Land West of Patching Hall Lane – 200 dwellings)	Severe congestion has been highlighted on the B1008 corridor, with safety concerns at several locations, such as Patching Hall Lane near the start and end of the school day. Increased traffic will heighten accident risk and worsen congestion. No adequate traffic safety assessment has been carried out during school term time, which is essential for legal compliance.	Strategic Policy S9 – Infrastructure Requirements, paragraph 6.91 of the Pre-Submission Local Plan states that more detailed analysis of traffic impacts and mitigation options testing will be required through the preparation of Transport Assessments/Statements as part of future planning applications. The Highways Authority will then have a further opportunity to review and assess the impact of development traffic to ensure that sufficient mitigation is provided. Where necessary, this would include a Road Safety Audit, speed survey, junction modelling and swept path analysis for larger vehicles such as HGV's.

Table Item ID	Summary of Representation	Detailed representation made	Response
			Site policy SGS19 requires development proposals to accord with a masterplan to be approved by CCC. A Transport Assessment, which is required by the City Council and the Highways Authority to inform any future planning application as set out in the Local Validation Checklist and referenced in paragraph 1.44 of the Pre-Submission Plan. Further details are also provided in the ECC Developers' Guide to Infrastructure Contributions (2024). Any development access arrangements would need to be compliant with highway design regulations and go through appropriate Road Safety Audits, as required by ECC Development Management Policies (2011) DM14 – Safety Audits. This would be undertaken at the masterplan/planning application stage by an independent safety auditor and reviewed by ECC, as the highway authority, as part of any planning application.
Comment by: Dan Steadman (C1397912) – Reference: AS-676 and AS-677			
7.	**Patching Hall Lane/B1008 and School Lane/B1008 Junction Congestion** Comments in relation to Strategic Growth Site 18a (Land	Key junctions, including Patching Hall Lane/B1008 and School Lane/B1008, are forecast to operate at or over capacity by 2041, even with signal optimisation and proposed mitigation. The additional traffic from developments will exacerbate congestion, increase journey times, and raise safety concerns for pedestrians and cyclists. The proposed mitigation schemes remain unfunded and with no guarantee of delivery.	Strategic Policy S9 – Infrastructure Requirements, paragraph 6.91 of the Pre-Submission Local Plan states that more detailed analysis of traffic impacts and mitigation options testing will be required through the preparation of Transport Assessments/Statements as part of future planning applications. The Highways Authority will then have a further opportunity to review and

Table Item ID	Summary of Representation	Detailed representation made	Response
	Northwest of Chelmsford [North of Hollow Lane] – 100 dwellings) and Strategic Growth Site 19 (Land West of Patching Hall Lane – 200 dwellings)		assess the impact of development traffic to ensure that sufficient mitigation is provided. Site policies SGS18a and SGS19 require development proposals to accord with a masterplan to be approved by CCC. Both sites include the policy requirement for appropriate measures to promote and enhance active and sustainable modes, which includes public transport. These will be identified as part of a Transport Assessment, which is required by the City Council and the Highways Authority to inform any future planning application as set out in the Local Validation Checklist and referenced in paragraph 1.44 of the Pre-Submission Plan. Further details are also provided in the ECC Developers' Guide to Infrastructure Contributions (2024). Any future requirements for the site must comply with statutory tests as being necessary to make the development acceptable in planning and highways terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. Any development access arrangements would need to be compliant with highway design regulations and go through appropriate Road Safety Audits, as required by ECC Development Management Policies (2011) DM14 – Safety Audits. This would be undertaken at the masterplan / planning application stage by an independent safety auditor and reviewed by ECC, as the

Table Item ID	Summary of Representation	Detailed representation made	Response
			Highways Authority, as part of any planning application.
Comment by: Graham Poulteney (1095979) – Reference: AS-758			
8.	**Safety and traffic level concerns on the B1008 in Ford End** Comments in relation to Growth Site 14b (Land South of Ford End Primary School – 75 dwellings)	A new roundabout is proposed as the only access point to the new development despite the B1008 being a 'priority route' for emergency services. Is this roundabout going to just be a white circle on the road? Is an out-of-date traffic measurement system still being used? Conservatively, 75 new dwellings are going to produce 150 new vehicles to the village, most moving at least twice on an average day. Have 'traffic calming measures' and the additional emissions, next to a primary school, been considered.	Full details of the access arrangements will be determined at the planning application stage. Any development access arrangements would need to be compliant with highway design regulations and go through appropriate Road Safety Audits, as required by ECC Development Management Policies (2011) DM14 – Safety Audits. This would be undertaken at the planning application stage by an independent safety auditor and reviewed by ECC, as the Highway Authority, as part of any planning application. As part of the emerging Essex Local Transport Plan a Place and Movement Strategy sets out the type of road and associated treatment measures that can be used. Currently the B1008 is a PR1 route. Associated with this, ECC is currently out to consultation on it's Safer Speeds Strategy. Any changes that are made to the B1008 through Ford End as a result of the Safer Speeds Strategy and Place and Movement Strategy will be taken into account on what type of measures can be delivered along the corridor. Any necessary mitigation, including access arrangements, capacity and safety enhancements will be identified as part of a Transport Assessment, which is required by the City Council

Table Item ID	Summary of Representation	Detailed representation made	Response
			and the Highways Authority to inform any future planning application as set out in the Local Validation Checklist and referenced in paragraph 1.44 of the Pre-Submission Local Plan. Further details are also provided in the ECC Developers' Guide to Infrastructure Contributions. Any future requirements for the site must comply with statutory tests of being necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. The ECC Schools Design Guidance (May 2025), Principle 4 will need to be given due consideration as part of any Transport Assessment, which requires school sites to be free from air and noise pollution to enable pupils to have an appropriate learning environment. Development trip rates were determined using the TRICS database, which aggregates survey data from hundreds of recent development sites across the country and is updated on a regular basis. Local Plan traffic impact modelling was undertaken specifically for the weekday AM and PM peak hours. Trip rates used per dwelling were 0.216 for AM peak departures and 0.215 for PM peak arrivals. Whilst these are acknowledged to be low compared with rates that might be calculated using a 'business as usual' approach (i.e. using existing

Table Item ID	Summary of Representation	Detailed representation made	Response
			travel behaviour as a basis for determining future travel behaviour), they nevertheless represent a reasonable uptake in sustainable travel mode alternatives (an approach that is compatible with National Planning Policy Framework (NPPF) guidance). However, they are not as low as trip rates based directly on a 60% active and sustainable mode share.
Comment by: Stefan Gorecki (1393877) – Reference: AS-203			
9.	**Lack of consideration of existing congestion and poor active travel connections** Comments in relation to Strategic Growth Site 20 (Land to East and North of Rettendon Place – 350 dwellings)	There is no consideration of the existing traffic congestion, with a lack of recent modelling on Howe Green and Rettendon Turnpike to explain how the transport network will cope the extra traffic generated from the developments. The site will likely include active travel links, however, beyond that there is a lack of a safe and coherent active travel network.	Local junction modelling was undertaken for the Rettendon Turnpike junction using traffic data collected in September 2025 and latest Department for Transport journey time data from 2024 to validate the model to existing traffic conditions. Analysis confirms that the junction already exceeds capacity in the PM peak and that measures to mitigate development impact will be sought from developers of sites planned in the vicinity. The need for capacity improvements at the Rettendon Turnpike was previously identified through the A132 Route Based Strategy and South Woodham Ferrers Integrated Transport Package and documented in the evidence base for the Adopted Local Plan. The A12 Howe Green junction (J17) was modelled as part of the transport evidence base provided for the Pre-Submission Regulation 19 consultation and documented in the following report: Transport Impact Appraisal of Local Plan Review Pre-

Table Item ID	Summary of Representation	Detailed representation made	Response
			Submission, July 2025 Update, Essex Highways (T006). Strategic Policy S9 – Infrastructure Requirements, paragraph 6.91 of the Pre-Submission Local Plan states that more detailed analysis of traffic impacts and mitigation options testing will be required through the preparation of Transport Assessments/Statements as part of future planning applications. The Highways Authority will then have a further opportunity to review and assess the impact of development traffic to ensure that sufficient mitigation is provided. Site policy SGS20 requires development proposals to accord with a masterplan to be approved by CCC. The site includes a policy requirement to promote and enhance active and sustainable modes, which includes public transport, as part of the site infrastructure improvements. There is also a policy requirement to provide safe and convenient pedestrian and cycle connections within the site, and paragraph 2.170 requires opportunities for active and sustainable modes to be maximised by providing safe and convenient pedestrian and cycle connections within the site, with links into the wider network, for example linking to the existing footways along Main Road, Rettendon. Beyond the site, active travel links will need to tie into the existing network to enable residents to access local facilities within the village. However,

Table Item ID	Summary of Representation	Detailed representation made	Response
			beyond this, the location of the site lends itself more towards sustainable transport options, such as bus connections into key local destinations (Wickford, South Woodham Ferrers), rather than an extensive active travel network. Any future requirements for the site must comply with statutory tests as being necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.



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