HS003 Matter 3

Chelmsford Local Plan

Examination Hearing Statement – Strategic Priorities, Development Requirements and Spatial Principles

November/December 2026

Chelmsford Local Plan

Introduction

1. This hearing statement sets out the Council's response in relation to the Inspector's Matters, Issues and Questions.

2. All the evidence base documents referred to in this statement are listed at the end of the Hearing Statement, with their evidence base or examination document reference numbers as applicable.

3. Any relevant proposed modifications are included in a table at the end of each question.

Matter 3 – Strategic Priorities, Development Requirements and Spatial Principles	
Issue 1	**Whether the Plan will be effective in addressing the Strategic Priorities for the climate, growth and place**
Q3.1	**Do the Strategic Priorities (climate; growth; and place) provide a sound basis on which to underpin the strategic policies in the Plan in order to deliver its vision?**

CCC Response to Q3.1

4. It is the Council's position that the Strategic Priorities provide a sound basis on which to underpin the Local Plan.

5. The Council's corporate strategy Our Chelmsford, Our Plan **(OSP014)** sets out the Council's strategy for creating a fairer, greener and more connected community. The nine Strategic Priorities are set out at Chapter 3 of the Pre-Submission Local Plan **(SD001)** (page 37 (PDF page 37). They have been grouped into themes of climate, growth and place to demonstrate the links between them. They set the overall policy direction for all the strategic policies, site allocations and development management policies in the Local Plan.

6. This reflects the requirement set out in the 2023 NPPF to set the strategic priorities to address the planning authority's priorities for the future development and land use in its area (paragraph 17, page 8 (PDF page 8).

7. As this Plan is a review of the Adopted Local Plan (**OSP015**), these Strategic Priorities have been developed from those included within **OSP015** but with greater emphasis on bringing forward the Council's Climate Emergency declaration of 2019 and subsequent Action Plan **(CC022)**, and promoting smart, active travel and sustainable

transport.

8. They also reflect and continue the success of past Local Plans, and have regard to the baseline as set out in the 'Local Context' and 'Current and Future Roles' sections of the Pre-Submission Local Plan **(SD001)** (pages 26-35 (PDF pages 26-35).

9. In particular this provides structuring principles for meeting housing and job needs whilst directing growth to avoid areas such as in areas of flood risk, ensuring provision of strategic and local transport infrastructure and active travel measures, protection of habitats, protecting the Green Belt from inappropriate development, provision of employment, and where new infrastructure can be provided or capitalised on.

10. The Spatial Principles have been shaped by the consultation responses including adding references to waste infrastructure and recycling, gigabit speed broadband, further traffic impact work, and additional types of healthcare provision.

11. Collectively, they provide a sound basis on which to underpin the strategic policies in the Plan in order to deliver its vision.

Q3.2	**The Plan period is 2022 to 2041. What is the Council's anticipated date of adoption? Would the strategic policies of the Plan look ahead over a minimum of 15 years from adoption as required paragraph 22 of the National Planning Policy Framework (the Framework)? Is the approach justified, effective and consistent with national policy?**

CCC Response to Q3.2

12. The Local Plan period runs from 2022 until 2041. The NPPF says that strategic policies should look ahead over a 'preferred' 15-year period from adoption, although this is not a regulatory requirement. The Local Plan is anticipated to be adopted in early 2027, giving the Plan closer to a 14 year time period.

13. The Pre-Submission Local Plan consultation in February to March 2025 was undertaken in sufficient time to ensure a 15 year plan from adoption, which at the time was anticipated to be quarter 1 2026. Following this consultation, the Council identified that it was necessary to identify further sites for allocation, and decided to undertake an additional Regulation 19 consultation to identify additional sites to help meet updated Local Plan housing requirements.

14. Extending the plan period at that time may have required revisiting key evidence base studies, adding further significant delays into the timetable.

15. Allowing for the additional sites consultation, the timescale has remained broadly in line with that set out in the Council's Local Development Scheme for 2025-2028

(LDS003) of October 2025. Submission of the Local Plan met the deadline stated in the LDS (para 4.3) of 12 June 2026. Independent Examination is scheduled for quarter 4 2026, and adoption is therefore anticipated in quarter 1 of 2027. On this basis the Plan would be closer to 14 years on adoption.

16. Although this would be below the preferred 15 year time period set out in the NPPF, this is not an absolute requirement. The Council considers that this timescale would remain appropriate given that it is a 'transitional' plan and is proposing strategic allocations which will deliver to the end of, and beyond, the plan period. It also represents a pragmatic and reasonable approach to facilitate the ongoing allocation of sites to meet the area's development needs.

17. The subsequent Local Plan will be prepared under the provisions of the 2026 NPPF, which will commence no later than five years after the adoption of this Local Plan, resulting in a plan that will look forward at least 10 years from adoption of the Local Plan and supersede it.

18. The Council therefore considers that the approach is sound as it justified, effective and consistent with national policy.

Issue 2	**Spatial Principles**
Q3.3	**<u>Strategic Policy S1</u>** **Does the policy provide the right approach to the distribution of development?**

CCC Response to Q3.3

19. It is the Council's position that the Spatial Principles in Strategic Policy S1 **(SD001)** (page 46 (PDF page 46)) provide a robust basis for the approach to distribution of development.

20. The Spatial Principles direct development to the most sustainable locations, in particular in relation to sustainable locations, protection of the Green Belt from inappropriate development, focusing development in line with the settlement hierarchy, respecting and protecting environmental and historic features, and ensuring infrastructure can be utilised and provided to support development.

21. These Spatial Principles clearly set out the Council's approach to meeting the requirements of paragraph 11. a) of the 2023 NPPF (page 6 (PDF page 6)), through promoting a sustainable pattern of development that meets development needs, aligns growth and infrastructure, improves the environment and mitigates/adapts to climate change.

Q3.4	**Does it provide a clear set of spatial principles that are in accordance with national policy including in relation to the Green Belt?**

CCC Response to Q3.4

22. It is the Council's position that Strategic Policy S1 **(SD001, page 46)** provides a clear set of spatial principles that are in accordance with national policy contained in the National Planning Policy Framework (**NPPF**, December 2023) including in relation to the Green Belt.

23. As explained in Paragraph 4.3 of the Local Plan (**SD001**, page 46) the spatial principles set out in Strategic Policy S1 guide how the Strategic Priorities and Vision of the Local Plan will be achieved. These spatial principles together shape the Local Plan's Spatial Strategy. The spatial principles are not listed in order of preference or priority but are all inter-related and have been considered together to shape the Spatial Strategy. Strategic Policy S1 requires all new development to accord with the spatial principles listed in the policy, where relevant. The reasoned justification to Strategic Policy S1 sets out an explanation of each of the spatial principles.

24. The Council considers that the Spatial Principles in Strategic Policy S1 are consistent with: Chapter 2 – Achieving sustainable development; Chapter 3 – Plan-making; Chapter 5 – Delivering a sufficient supply of homes; Chapter 7 – Ensuring the vitality of town centres; Chapter 9 – Promoting sustainable transport; Chapter 11 – Making effective use of land; Chapter 13 – Protecting Green Belt land; Chapter 14 – Meeting the challenge of climate change, flooding and coastal change; and Chapter 15 – Conserving and enhancing the natural environment of the National Planning Policy Framework **(NPPF, December 2023)**, in particular Paragraphs 8c, 16, 20b, 20c, 35c, 69, 74a, 83, 90a, 109, 124c, 124d, 128c, 157, 165, 166 to 172, 180a, 180b, and 185.

25. Spatial Principle a - requires that all new development where relevant '*Locate at well-connected and sustainable locations*' which is consistent with **NPPF Paragraph 109** that states '*Significant development should be focused on locations which are or can be made sustainable, through limiting the need for travel and offering a genuine choice of transport modes.*'

26. Spatial Principle c - requires that all new development where relevant 'Promote the use of suitable previously developed land for development' which is consistent with **NPPF Paragraph 124c** that states '*Planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other needs …*' and **NPPF Paragraph 124d** that states '*Planning policies*

and decisions should promote and support the development of under-utilised land and buildings, …'

27. Spatial Principle d – requires that all new development where relevant, 'Continue the renewal and enhance the vitality of Chelmsford City Centre and its Urban Area' which is consistent with **NPPF Paragraph 90a** states '*Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should define a network and hierarchy of town centres and promote their long-term vitality and viability …*' Spatial Principle d is also consistent with **NPPF Paragraph 124c** and **NPPF Paragraph 124d** by ensuring the use of previously developed sites for new development, including residential development, in Chelmsford City Centre and its surrounding Urban Area.

28. Spatial Principle e – requires that all new development where relevant 'Focus development at the higher order settlements outside the Green Belt and respect the existing development pattern and hierarchy of other settlements'. Spatial Principle e is consistent with **NPPF Paragraph 83** which states that '*To promote sustainable development in the rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services*.' Spatial Principle e is also consistent with **NPPF Paragraphs 90a** and **109** by focusing development at settlements to promote their renewal and long-term vitality and where there is brownfield land and under-utilised buildings and land, and at locations which are or can be made sustainable, through limiting the need for travel.

29. Spatial principle f – requires that all new development where relevant 'Respects the character and appearance of landscapes and the built environment, and preserve or enhance the historic and natural environment and biodiversity'. Spatial Principle f is consistent with: **NPPF Paragraph 8c** which sets out the overarching environmental objective of the planning system to achieve sustainable development which is '*to protect and enhance our natural, built and historic environment: including making effective use of land, improving biodiversity, using natural resources prudently, …*'; **NPPF Paragraph 180a** which states that 'P*lanning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)'*; **NPPF Paragraph 180b** which requires planning policies and decisions to recognise '*the intrinsic character and beauty of the countryside*'; and **NPPF Paragraph 185** which sets out how plans should '*protect and enhance biodiversity and geodiversity*'.

30. Spatial principle g – requires that all new development where relevant 'Locate development to avoid or manage flood risk and reduce carbon emissions'. Spatial Principle g is consistent with **NPPF Paragraph 157** which states: '*The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure*' and **NPPF Paragraph 165** which states: '*Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere*' by locating development to avoid or manage flood risk and to reduce carbon emissions. Spatial Principle g is also consistent with **NPPF Paragraphs 166 to 172** which set out the approach to be taken to managing flood risk.

31. Spatial principle h – requires that all new development where relevant 'Ensure development is served by necessary infrastructure and encourage innovation'. Spatial Principle h is consistent with **NPPF Paragraphs 20b and 20c** which state: '*Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for: b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*' and '*c) community facilities (such as health, education and cultural infrastructure)'*. Principle h is also consistent with NPPF Paragraph 20 c

32. Spatial principle i – requires that all new development where relevant 'Locate development to utilise existing and planned infrastructure effectively'. Spatial Principle i is consistent with **NPPF Paragraph 74a** which states that when identifying suitable locations for larger-scale development such as new settlements or significant extensions to existing villages and towns, strategic policy-making authorities should '*consider the opportunities presented by existing or planned investment in infrastructure*'. Spatial principle I is also consistent with **NPPF Paragraph 128c** which states '*Planning policies and decisions should support development that makes efficient use of land, taking into account the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement …'*

33. Spatial principle j - requires that all new development where relevant 'Ensure development is deliverable'. Spatial Principle j is consistent with **NPPF Paragraph 16** which requires that '*Plans should be prepare positively, in a way that is aspirational*

but deliverable', **NPPF Paragraph 35c** which requires that plans are '*deliverable over the plan period*' and **NPPF Paragraph 69** which states that '*Planning policies should identify a supply of specific, deliverable sites for five years following the intended date of adoption*'.

34. Spatial Principles in relation to protection of the Green Belt are contained in the Strategic Policy S1 Spatial principle b (**SD001,** page 46 (PDF page 46)). This high level principle in relation to Green Belt is further expanded through Strategic Policy S11(a) and supported by Development Management Policies DM6, DM9, DM10, DM11 and DM12 (**SD001**, pages 254-268). Collectively, these policies safeguard the openness and permanence of the Green Belt by restricting inappropriate development and ensuring that development does not conflict with the purposes of including land within the Green Belt.

35. It is the Council's position that the Local Plan's Spatial Principles are consistent with national policy and the approach to new development in the Green Belt is consistent with national policy contained in the NPPF 2023 and, notwithstanding the introduction of additional policy criteria, remains aligned with the relevant Green Belt policies in the NPPF 2026.

36. Overall, the Spatial Principles are in accordance with national policy. The Council considers the Spatial Principles in Strategic Policy S1 (**SD001**, page 46) are therefore sound.

Q3.5	**Does it provide flexibility to achieve sustainable development through a range of site types and sizes?**

CCC Response to Q3.5

37. While Strategic Policy 1 does not set out to determine site types and sizes, it sets the locational considerations which have been used to help determine the Spatial Strategy, which includes a range of different site types and sizes.

38. The Spatial Principles have therefore influenced and provided the flexibility to achieve sustainable development through the site selection which is demonstrated by the range of different site types and sizes of sites in the Spatial Strategy.

39. The Council considers the Spatial Principles in Strategic Policy S1 (**SD001**, page 46) are therefore sound.

Q3.6	Is the Policy sufficiently robust to secure the objective of developing previously developed land?

CCC Response to Q3.6

40. Spatial Principles in relation to previously developed land and the linked principle of renewal and enhancement of the City Centre are contained at points c and d of Strategic Policy S1 (**SD001,** pages 47-48 (PDF pages 47-48)).

41. These high level principles are further expanded through Strategic Policy S7 – The Spatial Strategy particularly in respect of the Settlement Hierarchy (page 71 (PDF page 71)) and Strategic Policy S17 – Future of Chelmsford City Centre. A number of site allocations within the City Centre and Urban Area are for development of previously developed land to help meet the objectives of strengthening the City Centre as a major residential and employment centre, and in allocating the major regeneration site at Chelmsford Waterside (Strategic Growth Site 1a).

42. The policy is therefore considered to be sufficiently robust to secure the objective of developing previously developed land.

43. The Council considers the Spatial Principles in Strategic Policy S1 (**SD001**, page 46) are therefore sound.

Q3.7	Is the Policy approach effective and justified in addressing speculative development proposals?

CCC Response to Q3.7

44. The Council's position is that the approach of Strategic Policy S1 is effective and justified in addressing speculative development proposals in addition to the allocated sites. The upper part of the policy makes it clear that the Spatial Principles will apply to all new development, and this is also clarified at paragraph 4.4 **(SD001)** which states that they will be applied as relevant to all development proposals and related applications (page 46 (PDF page 46)).

45. This approach is consistent with the adopted Local Plan (**OSP015**) which has been successful in addressing speculative development proposals. The policy approach is therefore effective and justified in this respect.

46. The Council considers the Spatial Principles in Strategic Policy S1 (**SD001**, page 46) are therefore sound.

Q3.8	**Will the policy be effective in meeting the needs of Chelmsford and accommodating unmet need from neighbouring authorities?**

CCC Response to Q3.8

47. It is the Council's position that the Spatial Principles are sound, justified, effective and consistent with national policy because they provide a clear, positively prepared and deliverable framework for meeting the accommodation needs of Chelmsford.

48. The Spatial Principles are effective because they can guide both the allocation of sites and the determination of planning applications throughout the plan period. They provide a coherent basis for identifying suitable provision and ensure that future delivery is directed towards locations that are sustainable and well-connected. They also provide sufficient flexibility to respond to additional site opportunities.

49. The Spatial Principles establish a clear strategy for directing provision to sustainable locations, supporting the objective of meeting accommodation needs whilst balancing environmental, infrastructure and place-making considerations.

50. The Local Plan contains effective mechanisms to monitor delivery and address any shortfalls.

51. Engagement with neighbouring authorities has established whether unmet needs require accommodation within Chelmsford. The Local Plan evidence base and IIA **(SD008)** have extensively tested our proposed Spatial Strategy to meet Chelmsford's development needs. As such there is no capacity in Chelmsford's proposed Spatial Strategy to accommodate any unmet housing need from neighbouring or nearby local authorities.

52. Statements of Common Ground have been agreed with all neighbouring authorities where all agree that Chelmsford is unable to accommodate any need, including unmet need from Basildon **(SOCG027)**, Castle Point **(SOCG013)** and Southend-on-Sea City Council **(SOCG030)**.

53. The Council considers the Spatial Principles in Strategic Policy S1 (**SD001**, page 46) are therefore sound.

Q3.9	**Will the Policy be effective in addressing any identified additional housing needs?**

CCC Response to Q3.9

54. It is the Council's position that the Spatial Principles will be effective in meeting any additional housing needs.

55. The Spatial Principles establish a flexible and criteria-based framework for the distribution and assessment of future development.

56. The Spatial Principles direct development towards sustainable locations that are well related to existing settlements, services, facilities, employment opportunities and infrastructure. By focusing on the characteristics of suitable locations the principles provide sufficient flexibility to accommodate additional housing needs on non-allocated sites. This enables the Council to respond to opportunities for delivery without undermining the Spatial Strategy of the Local Plan.

57. The Spatial Principles are supported by the Plan's monitoring framework, in section 10 of the Plan, which allows the Council to assess delivery performance of the Local Plan and respond appropriately where evidence indicates that additional housing provision may be required.

58. The Council considers the Spatial Principles in Strategic Policy S1 (**SD001**, page 46) are therefore sound.

Matter 3 – Spatial Priorities, Development Requirements and Spatial Principles	
Issue 3	**Whether the Plan makes adequate provision for housing**
Q3.10	**Is the housing requirement of 1,210 dpa justified, evidence-based and consistent with national policy?**

CCC Response to Q3.10

59. It is the Council's position that the Local Plan housing requirement figure of 1,210 dpa is justified, evidence based and consistent with national policy.

60. The Strategic Housing Needs Assessment (SHNA) published in August 2023 **(AH001)** identified a need for 955 dwellings per annum (dpa) using the Standard Method applicable at the time. It concluded that there were no exceptional circumstances to deviate from the Standard Method either in an upward or downward direction.

61. The City Council declared a housing crisis in Chelmsford in February 2022, and levels of homelessness continue to rise. Taking this, and the annual variation in the Standard Method output into account, the Council proposed a Housing Requirement figure of 1,000 dpa for the Local Plan period in the Preferred Options Consultation **(PO003).**

62. Consultation on proposed reforms to the National Planning Policy Framework (NPPF) and planning system was published in September 2024. The proposed changes

included changes to the calculation of the Standard Method and transitional arrangements for emerging Local Plans where there was a gap of no more than 200 dwellings per annum between the local planning authority's revised housing need figure and its proposed housing requirement. The housing need for Chelmsford using the revised Standard Method at the time of the consultation was 1,406 dpa.

63. In response to the proposed changes, an addendum to **AH001** was published in November 2024 **(AH004).** This reviewed the implications of moving housing delivery from the previous standard method figure of 955 dpa up to a figure broadly equivalent (1,206) to the proposed housing requirement figure of 1,210 dpa. It projected an increase in net in-migration and reviewed the impact on a range of housing needs, including the need for affordable housing. It concluded that despite the level of need for affordable housing being high relative to the overall housing requirements, this does not point to any requirement for the Council to increase the Local Plan housing requirement because the link between affordable need and overall need is complex and many of those picked up as having an affordable need are already in housing. Also, the amount of affordable housing delivered will be limited to the amount that can viably be provided where suitable opportunities arise.

64. The Employment Land Review Focused Update **(ECON003)** sets out that the Council can still meet labour demand, with flexible site allocations (paragraph 4.5, page 20 (pdf page 22)) using the updated forecasts from **AH004.**

65. The IIA **(SD008)** considered alternatives for the level of housing growth:

- Lower growth (approx. 955 dpa or 18,145 total dwellings) based on **AH001.**
- Transitional growth (approx. 1,210 dpa or 22,990 total dwellings) based on the housing need identified through the revised Standard Method and transitional arrangements.
- Higher growth (approx. 1,406 dpa or 26,714 total dwellings) based on the housing need identified through the revised Standard Method published for consultation in July 2024.

66. The IIA **(SD008)** acknowledged that the lower growth alternative is not in line with the revised NPPF, and it could be argued this is not a reasonable alternative but included this scenario as several representations were received from the public on the Preferred Options Consultation **(PO003)** questioning the level of growth proposed in the Local Plan.

67. In terms of meeting housing need, Options 2a to 2d of the IIA **(SD008)** (Table 2, page 190 (pdf 202)), all proposed the same level of housing growth (1,210 dpa) and were identified as having a significant long-term positive effect as well as helping to deliver a wider range of housing types compared to the lower growth option tested.

68. The Local Plan meets the requirements for examination against the NPPF 2023 under Annex 1, paragraphs 234-235 of the NPPF December 2024 (NPPF24) which remain

in force through Annex D, paragraph 8 of the NPPF August 2026 (NPPF26).

69. The transitional arrangements require Local Plans being examined under these arrangements to provide a minimum housing requirement of at least 80% of the revised Standard Method. The Focused Consultation Additional Sites (Regulation 19) Document **(SD002)** proposes a housing requirement of 1,210 new homes per annum (22,990 across the plan period). This equates to 83.6% of the May 2026 local housing need figure of 1,448 calculated using the latest Standard Method, enabling the Council to be examined under the NPPF26 (Submission Topic Paper: Housing **(TP009)** paragraphs 4.94 - 4.100 page 26 (pdf page 27)).

70. The Council has reviewed the implications of moving to a Housing Requirement figure of 1,210 through updates to its evidence base. The decision to use the transitional arrangements is a practical one recognising that the plan is transitional but offers the best chance of making quick progress to meet a high proportion of the latest need figure without disrupting planned supply and maintaining a plan-led approach.

71. The Council is proposing an amendment to modification **MOD Ref 58 (SD005)** to reflect the latest local housing need figure using the standard method and the resultant percentage calculation of the housing requirement as a proportion of this.

72. The Council considers the housing requirement figure of 1,210 is sound. **Amended MOD Ref 58 (SD005)** is required to ensure the policy is up to date.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
AMEND Ref 58	68	61	Strategic Policy S6 Paragraph 3.10	*Amend paragraph:* The City Council declared a housing crisis in Chelmsford in February 2022 and levels of Homelessness continue to rise. Taking into account the range of housing needs identified in the SHNA 2023 and 2024 addendum note, the Council proposes a Housing Requirement figure of 1,210 homes per annum for the plan period 2022 – 2041. This equates to 83.6% of the latest local housing needs figure of 1,44854 per year calculated using the Standard Method	To ensure the plan is up to date

				published in the December 2024 NPPF.	

Q3.11	**Do the potential implications of using the higher Standard Method figure justify the lower figure in Policy S6?**

CCC Response to Q3.11

73. It is the Council's position that the housing requirement of 1,210 dpa is justified, evidence-based and consistent with national policy.

74. The Council has assessed the implications of using a higher figure and concluded that the housing requirement is a more sustainable strategy when assessed against reasonable alternatives.

75. A higher growth option of 1,406 new dpa (26,714 across the plan period) broadly equivalent to the full standard method figure was also assessed in the IIA **(SD008)** (paragraph 6.4.9 page 176 (pdf page 188), Table 6.3 page 182 (pdf page 194), Table 6.4 page 183 (pdf page 194)). This higher growth option (Option 3) assessed a higher housing figure together with additional housing site allocations. The IIA concluded that Option 3 performed more poorly overall than the submitted Local Plan (Option 2a) reflecting for example, greater resource use, strategic highway capacity constraints, and greater uncertainty with delivery (Assessment of Reasonable Alternatives (2) Housing page 190 (pdf page 202), paragraph 6.4.53 and Table 6.5 page 185 (pdf page 197)). The higher growth option 3 (1,406 dpa) whilst providing additional flexibility in delivery and choice of tenure, was also deemed to present a risk of stalled development sites through over-delivery with demand failing to match supply.

76. The IIA **(SD008)** took into consideration the importance of balancing population and employment growth. Significantly increasing the quantum of housing could disrupt the relationship between population growth, forecasts of new jobs and the number of new homes proposed, leading to out-commuting (Assessment of Reasonable Alternatives (3) Economy, Skills and Employment page 191 (pdf page 203), paragraph 6.4.53 and Table 6.5 page 185 (pdf page 197)).

77. Chelmsford's local housing need increased by 59% from April 2024 – December 2024 using the Standard Method, resulting in Chelmsford having the highest annual need in Essex. To meet local housing need in full using the Standard Method (1,448 net new dpa or an additional 4,522 homes across the plan period following) would require significant delays and extra costs to the Council because it would not be supported by the current evidence base, for example highways and other modelling have tested the sites as proposed and not higher numbers. Identifying land for 4,522 additional dwellings would require additional housing site allocations. This would require major changes to the Spatial Strategy and would be likely to require starting work on the new

plan-making system.

78. Withdrawal or delays in adopting the current plan would also have significant disadvantages for the Council and area including extending the lack of a five Year Housing Land Supply and losing the opportunity to bring forward growth in a coordinated manner. It would also be contrary to the Government's objective to expedite adoption of local plans as described in Minister of State Matthew Pennycook's letter to the Planning Inspectorate in October 2025 (**OSP020**).

79. The decision to proceed with a Housing Requirement figure that is 83.5% of the local housing need, is a reasonable one recognising that the plan is transitional but offers the best chance of making quick progress to meet a high proportion of the latest housing need figure without disrupting planned supply and maintaining a plan-led approach.

80. The Council considers the housing requirement figure of 1,210 is sound. **Amended MOD Ref 58 (SD005)** is required to ensure the policy is up to date.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
AMEND Ref 58	68	61	Strategic Policy S6 Paragraph 3.10	*Amend paragraph:* The City Council declared a housing crisis in Chelmsford in February 2022 and levels of Homelessness continue to rise. Taking into account the range of housing needs identified in the SHNA 2023 and 2024 addendum note, the Council proposes a Housing Requirement figure of 1,210 homes per annum for the plan period 2022 – 2041. This equates to 83.6% of the latest local housing needs figure of 1,44854 ~~54~~ per year calculated using the Standard Method published in the December 2024 NPPF.	To ensure the plan is up to date

Q3.12	**Are there any risks to the delivery of housing as a result of the supply buffer?**

CCC Response to Q3.12

81. It is the Council's position that any risks to the delivery of housing as a result of the supply buffer are effectively managed through the varied nature of the allocations as well as performance mechanisms embedded in national policy.

82. Through the Focused Consultation on Additional Sites (Regulation 19) document **(SD002),** eleven new and three expanded housing sites have added an estimated 1,297 dwellings to the five-year housing land supply (Years 2 – 6 of **LDS012**), as well as adding an estimated 1,592 dwellings in total to the housing land supply. The Council is proposing modifications to **MOD Ref 59 (SD005)** and **MOD Ref 60 (SD005)** to update the housing land supply figures**.**

83. The supply is varied in terms of when sites were allocated and the volume of sites with planning permission in the earlier stages of the plan period. Figure 19 in the Submission Topic Paper: Housing (**TP009,** page 37 (pdf page 38)), shows that most of the supply in the early part of the plan period comes from sites that were allocated in the adopted Local Plan (2020) or earlier development plan documents. The new Local Plan allocations are not forecast to contribute a large proportion of the net new supply until approximately halfway through the plan period although **SD002** improves the contribution from new supply in the first five years from adoption.

84. The volume of dwellings to be delivered on different site sizes is also reasonably well distributed as shown in Figure 20 of **TP009** (page 38 (pdf page 39)).

85. The total provision on small sites no larger than one hectare equals 12.6% of the adopted and new Local Plan allocations (see Figures 23 and 24, paragraph 4.169., pages 39 – 41 (pdf pages 40 – 42) of **TP009**) and 7.6% of the total Local Plan allocations will be delivered on medium sites of between one and two and a half hectares in size (paragraph 4.170., page 41 (pdf page 42) of **TP009)**. National policy recognises the contribution small and medium sites in make to both meeting the housing requirements of an area and their ability to be built out relatively quickly.

86. Historically the Council has included a housing supply buffer of between 16 – 18% across different Local Plan periods.

87. To help achieve the step change in the housing requirement and comply with the transitional arrangements, the supply buffer has been reduced to 8.4%. Using the supply buffer envisaged in the Preferred Options (Regulation 18) Local Plan **(PO003)**, enabled the Plan to quickly pivot and proceed under the transitional arrangements for

a plan-led system.

88. National policy does not require a supply buffer, and the supply of new dwellings will be closely monitored through the Authority Monitoring Report. The Local Plan includes a monitoring framework which sets out a series of triggers and actions relating to Strategic Policy S6 (**SD001**, page 311).

89. Risks to the delivery of housing are intrinsically managed by the requirements of national policy to maintain a 5-year housing land supply with an appropriate buffer and the Housing Delivery Test.

90. The Council considers the housing supply buffer is sound. **MOD Ref 59 (SD005)** and **MOD Ref 60 (SD005)** are required to ensure the policy is up to date.

Modifications

<table>
<tr><th>Ref in SD005</th><th>Page No in PSLP</th><th>Page No in ASLP</th><th>Policy/ Para etc</th><th>Modification proposed</th><th>Reason</th></tr>
<tr><td>Ref 59</td><td>68</td><td>62</td><td>Strategic Policy S6 Paragraph 3.13</td><td>Amend paragraph:
Provision is made for a total of 24,914 ~~24,915 23,326~~ new homes in the period 2022 - 2041. When considering existing housing completions (3,057~~2,650 1,837~~), existing sites with planning permission (2,259 ~~2,510 3,016~~), existing Local Plan allocations to 2036 (11,953 ~~11,975867~~) and Windfall Projection to 2041 (2,218 ~~2,36273~~), the residual new Local Plan Allocations for the period to 2041 is 5,427 ~~5,418 4,233~~ new homes.</td><td>To ensure the plan is up to date</td></tr>
<tr><td>Ref 60</td><td>68</td><td>62</td><td>Strategic Policy S6 Paragraph Table 2: Housing Supply</td><td>Amend Table 2:
<table>
<tr><td>Housing Supply 2022/23 to 2040/41</td><td>Net new homes</td></tr>
<tr><td>Completions 2022/23 – 202543/2654</td><td>3,057
~~2,650~~
~~1,837~~</td></tr>
<tr><td>Sites with planning permission (excludes existing Local</td><td>2,259
~~2,510~~
~~3,016~~</td></tr>
</table></td><td>To ensure the plan is up to date</td></tr>
</table>

				Plan allocations)		
				Existing Local Plan allocations	11,953 ~~11,975867~~	
				New Local Plan Review Allocations	5,427 ~~5,418~~ ~~4,233~~	
				Windfall allowance (2028~~7~~-2041)	2,218 ~~2,36273~~	
				TOTAL SUPPLY	24,914 ~~24,915~~ ~~23,326~~	

Q3.13	**Are there particular constraints to identifying additional sites within the Plan period in the event of housing and employment development not coming forward as envisaged?**

CCC Response to Q3.13

91. It is the Council's position that there are no overriding constraints to identifying additional sites within the Plan period in the event of housing and employment development not coming forward as envisaged.

92. In trying to establish reasonable alternatives for the Plan, the IIA **(SD008)** explored the land available for development during the Local Plan period. Whilst the Green Belt is considered a constraint to development as a designation that is contrary to Policy S7 The Spatial Strategy (**SD002**, page 64), alternative site options which are situated within both the Green Belt and Green Wedge were not included in any of the alternative spatial options to help meet any residual housing needs because there are sufficient and suitable site options outside of these designations.

93. The Focused Consultation on Additional Sites (Regulation 19) document **(SD002),** demonstrates how relatively quickly new and expanded housing sites can be added to the Local Plan land supply, should they be required.

94. The Local Plan includes a monitoring framework which sets out a series of triggers and actions relating to Strategic Policy S6 (**SD001**, page 311). This includes instigating a full or focused formal review of the Local Plan if the Housing Delivery Test output falls below 75%. This is preceded by an action plan and a 20% buffer being added to the Council's five-year land supply for earlier triggers, to try and bring additional sites forward into the supply.

95. The monitoring framework also includes growth area specific triggers whereby if each area is not delivering net new homes or employment floorspace as set out in the Local

Plan Trajectory, the Council must consider the reasons for any imbalance in delivery against the targets and consider whether the policy requirement itself needs to be reviewed as part of a full or focused formal review of the Local Plan (**SD001**, page 312-313). The Council is proposing modifications to **MOD Ref 330 (SD005)** to update the net new homes figures**.**

96. The Council maintains a 'Call for Sites' database which is open all year round. It allows the Council to hold an up-to-date database of sites within its area that may be suitable for development. The Call for Sites process contains cut off times when the database is stopped, and the Strategic Housing and Employment Land Availability Assessment (SHELAA) is carried out.

97. The 2026 SHELAA **(SHELAA001)** assessed a total of 404 sites. 78 sites were removed to avoid double counting but of the remaining 326 the total residential yield equalled an estimate 50,243 dwellings, 36,084 of which were assessed to either score highly or well against the assessment criteria or face only moderate constraints that would require mitigation (**SHELAA001**, Non-Technical Summary, page 5 (pdf page 6)). Only 14,159 of the total estimate dwelling output was assessed to be contrary to national policy or face significant constraints or adverse impacts that cannot be mitigated. The 2026 SHELAA also included 284 hectares of employment land across 20 different sites **(SHELAA001**, Non-Technical Summary, page 5 (pdf page 6)).

98. The Council does not consider there to be any overriding constraints to identifying additional sites within the Plan period and considers the Local Plan positively prepared and sound. **MOD Ref 330 (SD005)** is required to ensure the monitoring framework reflects Policy changes.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
Ref 330		79	Monitoring Framework Strategic Policy S7	*Amend Targets:* **Growth Area 1:** Net new homes – 4,521 ~~4,535~~ ~~4,476~~ **Growth Area 2:** Net new homes – 7,502 ~~7,201~~ ~~7,501~~ **Growth Area 3:** Mixed employment sqm – 90,805 ~~87,200~~ **Growth Areas 1 – 3**: Windfall Allowance 2028~~7~~-2041 – 2,218 ~~2,362~~ ~~2,373~~	To ensure the plan is effective

Q3.14	**Is the Plan consistent with national policy in relation to housing developments on sites no larger than one hectare?**

CCC Response to Q3.14

99. It is the Council's position that the Local Plan is consistent with national policy in relation to housing developments on sites no larger than one hectare (2023 NPPF para 70 a), page 19).

100. As of April 2026, 1,398 new dwellings are due to be delivered on small sites of 1 hectare or less, which equals 8% of the existing Local Plan allocations (11,953) and new Local Plan allocations (5,427). This excludes any self and custom build houses that will be delivered on developments of more than 100 dwellings in accordance with Policy DM1 C) i) (**TP009**, paragraph 4.167., page 39 (pdf page 40) and Figure 22, page39 (pdf page 40)).

101. The number of self-build and custom build dwellings that are due to be delivered on development sites of more than 100 dwellings across the plan period is 787 in total. When combined with the 1,398 dwellings due to be delivered on small sites, the total proportion of provision on small sites increases to 12.6% of the existing and new Local Plan allocations (**TP009**, paragraphs 4.168., page 39 (pdf page 40) and 4.169., page 4.169., page 41 (pdf page 42) and Figure 23, pages 39 – 41 (pdf pages 40 – 42)).

102. The Council considers its approach to small sites consistent with national policy and the Local Plan to be sound.

Q3.15	**Is there robust evidence to demonstrate that unmet need from neighbouring authorities cannot be accommodated in Chelmsford? What discussions have taken place with neighbouring authorities?**

CCC Response to Q3.15

103. It is the Council's position that it can demonstrate that unmet need from neighbouring authorities cannot be accommodated in Chelmsford.

104. A Mechanism for the Consideration of Unmet Housing Need **(AH005)** was developed and agreed by the Essex Planning Officers' Association (EPOA) in September 2017 for use across the Essex authorities. This sets out the methodology by which each local planning authority, together with their Housing Market Area (HMA) partners:

i) should agree their full objectively assessed housing number, and
ii) if there is likely to be an unmet housing need because of constraints applicable to

the area of that authority, the process to follow to request an adjoining HMA to meet or contribute towards meeting the unmet need.

105. To date, none of the local authorities that are considered to share a HMA with Chelmsford (Braintree District Council, Colchester Borough Council, Maldon District Council and Tendring District Council) have indicated that they are unable to meet their housing need.

106. The following Councils wrote to Chelmsford City Council, making a formal request for assistance in meeting their unmet housing need:

• Basildon Borough Council – November 2024 (after Preferred Options consultation stage) and September 2025 (post Pre-Submission Regulation 19 consultation stage)
• Castle Point Borough Council – at Issues and Options and Preferred Options consultation stages
• Southend-on-Sea City Council – at Preferred Options stage, and at Regulation 18 Stage of its draft Local Plan.

107. All the above-mentioned authorities referenced Green Belt restrictions as constraints in meeting their housing needs and/or issues relating to increased housing need through the application of the revised Standard Method for calculating housing need.

108. Chelmsford's local housing need calculated using the Standard Method increased by 59% from April 2024 – December 2024, resulting in the Chelmsford having the highest annual housing need in Essex (**TP009**, Figure, page 7 (pdf page 8)).

109. In order not to delay plan-making, the Council took the decision to progress its review of its Local Plan through transitional arrangements, requiring incorporation of most of the housing supply buffer identified at the Preferred Option stage to meet the revised housing requirement.

110. The Focused Consultation Additional Sites (Regulation 19) consultation **(SD002)** was then subsequently undertaken in November 2025 – January 2026 to improve the Council's five-year housing land supply position at the point of adoption of the Local Plan.

111. The Local Plan evidence base and Integrated Impact Assessment (IIA) **(SD008)** have extensively tested our proposed Spatial Strategy to meet Chelmsford's development needs. As such there is no capacity in Chelmsford's proposed Spatial Strategy to accommodate any unmet housing need from neighbouring or nearby local authorities.

112. Neighbouring local authorities are at different stages of plan preparation and review. National policy states that meeting housing need could be an exceptional circumstance to trigger the review of Green Belt boundaries and propose alterations to the Green Belt to meet these needs in full. The concept of 'Grey Belt' was also introduced in the NPPF (2024) and updated in the NPPF (2026), would need to be assessed. The South Essex Local Planning Authorities are all likely to be in the same

position in terms of Green Belt restrictions constraining their ability to meet their housing need, therefore it would make sense that a Green Belt review was undertaken strategically across the whole of South Essex and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes of the remaining Green Belt.

113. Basildon District Council also formerly sought assistance with meeting their identified need for Gypsy and Traveller pitches and Travelling Showpeople plots, having been unable to identify suitable land in the urban area and through a bespoke Call for Sites exercise. Chelmsford City Council has also undertaken a bespoke Call for Sites for Gypsy and Traveller sites, explored all relevant Strategic Housing and Employment Availability Assessment (SHELAA) submissions for additional pitches and plots and reviewed the possibility of expansion/intensification of existing Traveller sites. However, it was not possible to identify suitable and deliverable site allocations to meet the whole of the identified need for Chelmsford. The Local Plan includes a criteria-based policy to address the small shortfall within the Chelmsford City Council boundary. Consequently, there is no capacity to accommodate any unmet Gypsy and Traveller and Travelling Showpeople need from Basildon District Council.

114. Basildon Borough Council consulted on a third regulation 18 Plan from November 2025 to January 2026. Within this Plan, Basildon proposes to independently meet its housing, employment and Gypsy and Traveller provision in full (**SOCG027**, page 7).

115. The Essex Planning Officers' Association (EPOA) has agreed mechanisms for dealing with unmet housing and Gypsy and Traveller need, which provides a robust process and should be the starting point for such requests **(AH006)**.

116. Statements of Common Ground have been agreed with all neighbouring authorities where all agree that Chelmsford is unable to accommodate any need, including unmet need from Basildon **(SOCG027)**, Castle Point **(SOCG013)** and Southend-on-Sea City Council **(SOCG030)**.

117. The Council can demonstrate that unmet need from neighbouring authorities cannot be accommodated in Chelmsford and that it has fully engaged with neighbouring authorities therefore the Local Plan is sound and legally compliant.

Q3.16	**Does the Plan provide a robust approach to the provision of sites for Gypsies and Travellers and Travelling Showpeople in accordance with national policy?**

CCC Response to Q3.16

118. It is the Council's position that the Local Plan provides a robust approach to the provision of sites for Gypsies and Travellers and Travelling Showpeople in accordance with national policy.

119. Strategic Policies S6 **(SD002, page 60)** and S7 **(SD002, pages 64 – 68)** propose a total of 30 new allocated permanent pitches on strategic sites for Gypsies and Travellers. Strategic Policy S6 A) **(SD002, page 60)** sets out that the remainder of the need (10) will be met through windfall applications using the criteria of Policy DM3 and the regularisation of existing pitches. Considering changes to the identified need resulting from the revisions to the Planning Policy for Traveller Sites (PPTS) in 2024, the pitch need, to be met through windfall applications and the regularisation of existing pitches increases to 14 across the plan period **(TP009, paragraph 4.83. and Figure 10, pages 22 - 23 (pdf pages 23 -24))**. New modifications to Policy S6 Housing and Employment requirements **(SD002, page 60-61)** and the Reasoned Justification **(SD002, paragraph 3.17, page 63)** are proposed to reflect this.

120. The current supply of and need for new Gypsy and Traveller pitches using the 2024 PPTS and the breakdown of need set out in the GTAA is shown in **TP009** Figure 13, page 30 (pdf page 31).

121. The Gypsy and Traveller Pitches Trajectory 2022-2041 (April 2026) **(LDS021)** shows that already five windfall applications for five pitches have been granted planning permission. The Trajectory also includes the completion of a new site providing 9 pitches in 2022/23 via a planning obligation relating to strategic sites allocated in a previous Development Plan. The Council can therefore demonstrate that its policy approach of combining strategic site allocations and windfall permissions is effective.

122. The Council's SHELAA **(SHELAA001)** is open all year round so landowners can submit a new site on a rolling basis. In response to the low number of sites submitted for Gypsy and Traveller pitches through this process relative to the level of need identified in the draft Chelmsford Gypsy and Traveller Accommodation Assessment (GTAA), the Council conducted a bespoke Call for Gypsy and Traveller Sites in the Autumn of 2023. Two sites were submitted, both of which were in the Green Belt and have since been granted planning permission using the criteria of Policy DM3 **(SD001, page 246)**. One additional site (forming one pitch) was submitted to SHELAA in September 2024. All three sites constitute the five windfall sites that has since been granted planning permission as shown in **LDS021**.

123. The Council also considered whether it was feasible to expand existing public sites, but this option was dismissed on the basis that it would result in sites being larger the preferred 'around 10' site size.

124. National policy (NPPF 2026, Annex D, paragraph 10), requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets. Given the dynamics of the site allocations and the lack of sites submitted to the SHELAA and the bespoke Call for Gypsy and Travellers sites, it has not been possible to meet this requirement. The lack of a five-year supply of pitches was a material consideration in the granting of the windfall planning permissions and will continue to be a material consideration when sites are submitted for planning permission at the development management stage.

125. The Council will endeavour to ensure early delivery of additional pitches within the strategic site allocations wherever possible.

126. Strategic Policies S6 **(SD002, page 60**) and S7 **(SD002, pages 64 – 68)** propose a total of 28 new allocated permanent plots on strategic sites for Travelling Showpeople. Strategic Policy S6 A) sets out that the remainder of the need (10 plots) identified in the GTAA, will be met through windfall applications using the criteria of Policy DM3 and the regularisation of existing plots.

127. The Gypsy and Traveller Pitches Trajectory 2022-2041 (April 2026) **(LDS021)** shows that 15 plots within strategic allocations have a resolution to grant planning permission, and 8 plots have completed as part of a planning application allowed on appeal (Appeal reference: PP/W1525/W/24/3341747). The need arising from 8 plots at this yard were included in the final Chelmsford GTAA, but the need associated with the three undeveloped plots were not considered. New modifications to Policy S6 Housing and Employment requirements **(SD002, page 60-61)** and the Reasoned Justification **(SD002, paragraph 3.17, page 63)** are proposed to include the additional need associated with the three undeveloped plots.

128. The site granted planning permission on appeal was the only proposed Travelling Showpeople site in the SHELAA. A bespoke call for sites for Travelling Showpeople plots was not conducted alongside the Call for Gypsy and Traveller Sites, as the Preferred Options Local Plan proposed sufficient allocations to meet the needs identified in the draft GTAA.

129. It is not possible to expand the existing Travelling Showpeople sites and the intensification of plots on existing sites has led to the overcrowding problems identified as net new need in the Chelmsford GTAA.

130. Including the additional current need associated with three plots not yet developed at a site granted temporary planning permission on appeal, across the plan period the need to be met through windfall applications is small at 2 plots **(TP009, Figure 14, page 31 (pdf page 32))**.

131. Currently, the Travelling Showpeople Plots Trajectory shows a supply of 11 plots against an identified need for 29 plots between 2023-2027. Consequently, the Council will endeavour to ensure earlier delivery of additional plots within the strategic site allocations wherever possible.

132. The Council's position is that the Local Plan with the new modifications proposed in the table below provides a robust approach to the provision of sites for Gypsies and Travellers and Travelling Showpeople that is consistent with national policy.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
NEW	67	61	Strategic Policy S6	*Amend second and third paragraphs of A. Housing:* In order to meet the identified need of 44~~0~~ new permanent pitches for Gypsies and Travellers, sites providing a total of 30 permanent pitches for Gypsies and Travellers, as defined by national planning policy, will be allocated with the remainder of the need to be met through windfall applications using the criteria of Policy DM3. In order to meet the identified need of 41~~38~~ new permanent plots for Travelling Showpeople, sites providing a total of 28 permanent plots for Travelling Showpeople, as defined by national planning policy, will be allocated with the remainder of the need to be met through windfall applications using the criteria of Policy DM3.	For effectiveness and update the latest position
NEW	69	63	Strategic Policy S6 Paragraph 3.17	*Amend paragraph:* The updated findings of the Gypsy and Traveller Accommodation Assessment (GTAA) that covers the period 2023 to 2041 identifies a requirement for 44~~0~~ permanent Gypsy and Traveller pitches and 41~~38~~ permanent Travelling Showpeople plots to be developed by 2041 within Chelmsford for households	For effectiveness and update the latest position

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
				that meet the definition of Gypsies and Travellers in the PPTS ~~at the time the GTAA was published.~~	

Issue 4	**The Spatial Strategy**
Q3.17	**The overriding strategy in the Plan is to first make use of previously developed land within Chelmsford Urban Area and then to allocate land for development in:** **a. Sustainable Urban Extensions (SUEs)** **b. two new garden communities, underpinned by Garden City Principles** **c. expansion of existing established employment sites** **Is this approach justified, soundly based and consistent with national policy?**

CCC Response to Q3.17

133. The Council has given substantial weight to using brownfield land within settlements in line with the approach promoted by the 2023 NPPF (paragraph 124 c, page 36 (PDF page 36)). Allocating suitable and available brownfield sites within the City Centre accommodates around 7% of the overall need for the Plan period, leaving a large balance to be accommodated on greenfield sites.

134. Sustainable urban extensions will provide housing and employment in locations at the edge of the urban area of Chelmsford (in Growth Area 1) which have good links to the City Centre by public transport and active travel modes (such as cycling and walking), and at South Woodham Ferrers (in Growth Area 3) which will help to strengthen the town's important local role as a large town to the south of the Council's area. These can be accommodated without allocating land in the Green Belt, and are located to avoid coalescence between existing settlements.

135. Given the large scale of development required, the Council has continued the approach of the adopted Local Plan by planning for large new settlements to meet identified needs in a sustainable way through self-contained communities supported by the necessary infrastructure, as endorsed by the 2023 NPPF (paragraph 74, page 20 (PDF page 20)). These include large-scale dedicated areas for employment development within the new communities.

136. The approach to the expansion of existing established employment sites is supported by the Employment Land Review **(ECON002)** (paragraph 5.17, page 47 (PDF page 55)) which concluded that designated employment sites, particularly the smaller rural sites, perform well and have high occupancy rates. Extensions to these sites were proposed through the SHELAA process, and have been allocated for the contribution they will make to employment retention and creation in rural areas, to attract and retain the local workforce. Such sites will provide further rural inward investment opportunities and reflect the aspirations of national policy (2023 NPPF, paragraph 88 (page 24 (PDF page 24)) to support the sustainable growth and expansion of businesses in rural areas.

137. The approach in Strategic Policy S7 to first make use of previously developed land within Chelmsford Urban Area and then to allocate land for development in Sustainable Urban Extensions, two new garden communities, underpinned by Garden City Principles, and the expansion of existing established employment sites is therefore justified, soundly based and consistent with national policy.

Q3.18	**Given the Plan's reliance on meeting development needs in the SUEs and new garden communities and taking into account their scale, is there sufficient flexibility and resilience built into the Plan to deliver the housing growth envisaged, in the event of any underperformance of these allocations?**

CCC Response to Q3.18

138. It is the Council's position that there is sufficient flexibility and resilience built into the Plan to deliver the housing growth as envisaged, in the event of any underperformance of the SUEs and new garden community site allocations.

139. Alongside the two garden communities the Plan includes a mix of sites as set out in Figures 19 and 20, pages 37 and 39 (pdf page 38 and 39) in the Submission Topic Paper Housing **(TP009)** and is considered to provide flexibility and resilience. Smaller sites are anticipated to be delivered outright, and the larger sites will be delivered on a phased basis. This will be kept under review through the Monitoring Framework.

140. A range of site sizes and typologies are proposed, from City Centre/urban sites, through to smaller key service settlement and service settlement allocations, to large garden communities. In addition, a number of windfall sites are anticipated to continue to come forward throughout the plan period. The 'small sites' (under 1ha) are also 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.

141. The Council considers there is sufficient flexibility and resilience built into the Plan to deliver the housing growth as envisaged.

Q3.19	**What alternative approaches were tested in the preparation of the Plan?**

CCC Response to Q3.19

142. The Local Plan review has considered a number of alternative policy approaches and options including different development levels and spatial strategy options throughout the Plan's development.

143. At Issues and Options consultation stage **(IO001)**, five spatial approaches were developed for how growth could be distributed (page 96, PDF page 99)). This consultation led to a hybrid spatial approach which included the following elements:
    - focusing development in and close to the Urban Areas and Key Service Settlements outside of the Green Belt
    - the proposed allocation of a new garden community and sites directly related to the A12
    - sites in the Chelmsford Urban Area, which contain significant areas of previously developed land.

144. Alternative spatial strategy options were tested in other evidence base reports such as the Water Cycle Study Scoping Report **(CC002)** and Preferred Options Traffic Modelling Reports **(T001, T002, T002-A)**. Both the Pre-Submission IIA **(SD008)** and Additional Sites IIA Addendum **(SD009)** consider different spatial strategy and development site options for growth. More detail is set out in each evidence base report and summarised in the Spatial Strategy and Strategic Sites Topic Paper **(TP010)** (paragraph 4.78 onwards, pages 17-21 (PDF pages 18-22)).

145. A detailed response relating to the Local Plan's approach to alternative strategies is set out in the response to Matter 1, Question 1.3, covering the assessment process carried out through the Integrated Impact Assessment.

146. The Local Plan is considered to be sound and legally compliant in this regard.

Q3.20	**Does the Plan provide sufficient flexibility to respond to changes to future logistics and economic growth?**

CCC Response to Q3.20

147. It is the Council's position that the Plan provides sufficient flexibility to respond to changes to future logistics and economic growth.

148. Strategic Policy S6 – Housing and Employment Requirements **(SD002, page 60)** and Strategic Policy S7 - The Spatial Strategy **(SD002, page 64)**, makes provision for a

minimum of 173,146 sq.m of net additional employment floorspace to help accommodate economic growth and employment requirements. This figure increases to 176,751 sq.m when considering of SGS16b which has planning permission for 46,605 sq.m (**Modification Ref 62 (SD005, page 18).** In doing so, the Local Plan significantly exceeds the recommended minimum employment space requirements identified over the period to 2041 **(TPO14, paragraphs 4.54-4.57)**, thereby providing flexibility and choice to respond to changing market requirements and economic growth over the plan period.

149. Strategic Policy S8 – Delivering Economic Growth **(SD001, page 81)** ensures employment land allocations facilitate further economic diversification of Chelmsford's economy including supporting the growth sectors identified in Essex County Council's Essex Sector Development Strategy **(ECON005, page 18)**. This will ensure that the Plan can respond positively to future forecast economic growth changes.

150. Strategic Policy S7 - The Spatial Strategy **(SD002, page 64)** provides a portfolio of flexible employment allocations of different sizes, types and in a choice of locations. The use of 'around' employment floorspace figures and a broad range of E(g), B2 and B8 employment uses in site allocation policies including SGS3b **(SD001, page 152)**, SGS9a **(SD002, page 29)** and SGS16b **(SD001, page 211)** allows for flexibility in uses and site densities to respond to future market conditions and varying occupier requirements over the plan period, including for logistics occupiers.

151. Strategic Growth Site allocations SGS16a – East Chelmsford Garen Community (Hammonds Farm) **(SD001, page 200)** and SG16b – Land Adjacent to A12 Junction 18 Employment Area **(SD001, page 211)** provide a minimum of 89,605 sq.m (considering planning permission granted at SGS16b) with good access to the strategic road network. These are capable of accommodating a substantial quantum and range of employment floorspace including logistic and distribution uses on SGS16b. SGS6 – North East Chelmsford (Chelmsford Garden Community) employment allocation of 56,946 sq.m also offers the potential for some logistics growth given its location on the future strategic road network, specifically Willow Farm identified for 15,556 sq.m. Together these sites, alongside other employment site allocations, will enable the Local Plan to respond to changes in future logistics industry requirements and broader trends in economic growth.

152. The Monitoring Framework **(SD001 page 309 and SD002 page 77)** allows for the performance of the Plan to be monitored through the Authority Monitoring Report and to identify and respond to significant changes in market demand.

153. In addition, Policy DM4 **(SD001, page 248)** safeguards existing and proposed new employment areas helping to maintain a supply and choice of employment floorspace capable of responding to future changes. Against Policy S6 the delivery of net employment floorspace will be monitored against the Local Plan target in Strategic Policy S6 to 2041.

154. The Council considers that S8 will, alongside other policies in the Plan, provide sufficient flexibility to respond to changes to future logistics and economic growth. **MOD Refs 67 and 68 (SD005)** are required to ensure the policy is clear.

MODIFICATIONS

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
67	81		Strategic Policy S8	*Amend second sentence:* The Council will encourage links between business and the significant education sector in Chelmsford, in particular the role~~s~~ of ~~the~~ Anglia Ruskin University as a major economic catalyst for economic growth.	For clarity
AMEND Ref 68	83		Strategic Policy S8 Paragraph 6.61	*Amend paragraph:* The Council is seeking to enhance skills and access to new employment by local residents. The Council expects all ~~strategic scale~~ planning applications ~~of~~ for 50 or more homes or employment space providing 2,500 sq.m (GIA) or more floorspace, 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. In line with the ECC Developers Guide to Infrastructure Contributions ~~(2023)~~, the plan must be ~~shared with and agreed by the LPA and ECC ahead of~~ secured through the S106 agreement/planning condition. ~~being signed off. The plan should include options such as the direct~~	For clarity and to ensure the plan is up to date.

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
				~~delivery or skills and employability programmes, school / college engagement and work experience opportunities, or construction or workplace apprenticeship schemes for local residents. This will support the agenda to reduce skills disparities in Chelmsford. The plans will be secured through S106 agreements and~~ Further detail~~s will be~~ is set out in ECC's Developers Guide to Infrastructure and ~~an updated~~ the Council's Planning Contributions SPD which~~.~~ ~~This will~~ includes a requirement~~s~~ to cover ~~the Council's~~ monitoring costs. Developers will also be required to provide reports to inform ~~associated with the monitoring of the plans, with reports provided to the Council by developers for inclusion in the~~ Authority Monitoring Report~~s~~.	

Q3.21	**Is the evidence underpinning the employment requirement justified and consistent with national policy?**

CCC Response to Q3.21

155. It is the Council's position that the evidence underpinning the employment requirement is justified, proportionate, up to date and consistent with national policy.

156. The requirement is based on an up-to-date and PPG-compliant assessment of economic need within the 2023 Employment Land Review ('ELR', **ECON002**) and the December 2024 Focused Update ('ELRFU', **ECON003**), both prepared by independent consultants Lichfields and summarised in the Pre-Submission Employment Topic Paper **(TP006, paragraphs 3.37-3.53)** and Submission

Employment Topic Paper **(TP014, paragraphs 4.55-4.53)**. The Plan provides for more than the recommended minimum level of need, with flexible allocations that allow it to respond to growth which is over and above this.

157. The employment requirement is set by Strategic Policy S6 Part B **(SD002, page 60)** and delivered through the allocations in Strategic Policy S7 and the principles within Strategic Policy S8. The Local Plan **(SD002)** together with proposed modification **(Ref 62 SD005, page 18)** allocates 176,751 sqm of new employment floorspace across Use Classes E(g), B2 and B8 over the period 2022-2041.

National policy

158. The Local Plan has been prepared under the transitional arrangements, and is therefore examined against the December 2023 NPPF. References to the NPPF in this statement are to that version.

National Planning Policy Framework (December 2023)

159. Paragraph 8 of the National Planning Policy Framework (NPPF) (December 2023) explains that the planning system has three interdependent overarching objectives – economic, social and environmental – to be pursued in mutually supportive ways in order to achieve sustainable development. Under the economic objective, planning should help to build a strong, responsive and competitive economy by ensuring that enough land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity, and by identifying and coordinating the provision of supporting infrastructure.

160. Paragraph 86 states that planning policies should:

    a) *"set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;*

    b) *set criteria, and identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*

    c) *seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and*

    d) *be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances."*

161. Paragraph 87 adds that planning policies and decisions should recognise and address the locational requirements of different sectors, including by making provision for *"clusters or networks of knowledge and data driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations."*

162. Paragraph 123 requires strategic policies to set out a clear strategy for meeting objectively assessed needs, making as much use as possible of previously developed (brownfield) land.

163. Ultimately, the NPPF requires local authorities to have up-to-date and comprehensive evidence to inform their judgments about the need for, and relative importance of, the employment land in their areas.

Planning Practice Guidance

164. The Planning Practice Guidance (PPG) on Housing and Economic Needs Assessment advises that plan makers should build a robust evidence base to understand existing business needs, and that this should be kept under review as local circumstances and market conditions evolve. To understand current and future requirements, authorities should consider:

    a) *"the best fit functional economic market area;*

    b) *the existing stock of land for employment uses within the area;*

    c) *the recent pattern of employment land supply and loss – for example based on extant planning permissions and planning applications (or losses to permitted development);*

    d) *evidence of market demand (including the locational and premises requirements of particular types of business) – sourced from local data and market intelligence, such as recent surveys of business needs, discussions with developers and property agents and engagement with business and economic forums;*

    e) *wider market signals relating to economic growth, diversification and innovation; and*

    f) *any evidence of market failure – such as physical or ownership constraints that prevent the employment site being used effectively."* (Paragraph 2a-026)

165. When forecasting future needs using market signals, the PPG states that authorities should draw on a range of data that is current and robust, including:

    a) *"sectoral and employment forecasts and projections which take account of likely changes in skills needed (labour demand);*

    b) *demographically-derived assessments of current and future local labour supply (labour supply techniques);*

    c) *analysis based on the past take-up of employment land and/or future property market requirements; and*

    d) *consultation with relevant organisations, studies of business trends, an understanding of innovative and changing business models, particularly those which make use of online platforms to respond to consumer demand and monitoring of business, economic and employment statistics."* (Paragraph 2a-027)

166. The PPG also advises that *"authorities will need to take account of longer-term economic cycles in assessing this data, and consider and plan for the implications of alternative economic scenarios"* (paragraph 2a-027).

167. To establish underlying requirements for employment land, the PPG advises authorities to consider *"recent employment land take up and projections (based on past trends) and forecasts (based on future scenarios) and identify occurrences where sites have been developed for specialist economic uses"* (paragraph 2a-029).

168. To translate employment forecasts into land requirements, the PPG (paragraph 2a-030) identifies four key relationships to quantify:

    a) Standard Industrial Classification sectors to use classes;

    b) Standard Industrial Classification sectors to type of property;

    c) Employment to floorspace (employment density); and

    d) Floorspace to site area (plot ratios based on industry proxies).

Local Plan evidence

2023 ELR

169. The ELR (**ECON002**) assessed economic need over the period 2022-41 in line with the NPPF and PPG. It defined the core Functional Economic Area (FEMA) as Chelmsford, Maldon and Braintree, with the city also boasting strong links to Brentwood, Basildon and London **(paragraphs 2.32-2.33)**.

170. A review of commercial property market signals and agent feedback concluded that supply in the office market in Chelmsford was constrained, with one year of supply against past take-up and a lack of higher-quality space, while industrial demand exceeded supply for small and mid-sized units of up to 5,000 sq.m. The review of existing employment sites found all were performing well with high levels of occupancy **(paragraphs 7.12-7.14)**. Three scenarios of future requirements for employment floorspace/land were considered: labour demand, past development rates, and future labour supply. The resulting gross requirements ranged from between 990 sq.m (Scenario 2) to 213,820 sq.m (Scenario 3).

ELR 2024

171. The ELRFU (**ECON003**) refreshed the need scenarios and the supply balance in late 2024 to inform the Pre-Submission Regulation 19 Local Plan **(SD001)**. The purpose of the update was to primarily assess the Government's proposed changes to the NPPF, and in particular, the changes to calculating local housing need and its potential effect on the ELR scenario dealing with future labour supply. The approach of only updating what had changed (i.e., need and supply) is considered to have been proportionate. The evidence base underpinning the employment requirement was therefore up to

date when the plan was published for first Pre-Submission Regulation 19 consultation in February 2025.

172. In the ELRFU (**ECON003**), employment forecasts used to inform the labour demand scenario were updated from March 2022 to April 2024, past trends data from CoStar were updated to 2024, and the labour supply projections were aligned to the Strategic Housing Needs Assessment (SHNA) Addendum (**AH004**) figure of 1,206 dwellings per annum (dpa), a transitional figure aligned to the Standard Method.

173. Jobs were converted to floorspace using the four relationships set out in PPG 2a-030. A safety margin based on two years of take-up was added to give gross requirements **(ECON003, paragraphs 2.36-2.37)**, equivalent to approximately 22.4% of the Scenario 1 net requirement. The ELRFU **(ECON003, paragraph 2.39)** considered four approaches to estimating future losses and considered a qualitative review of existing sites cross-checked against past losses to be the most robust.

174. The ELR (**ECON002**) review of sites found existing employment sites performed well with high occupancy levels (**ECON002**, paragraphs 7.12–7.14), with modest past losses and only limited policy-led releases expected (**ECON003**, paragraph 2.41). This approach directly addresses the requirement of PPG paragraph 2a-026(c) on the recent pattern of employment land supply and loss.

175. Scenario 1 (labour demand) is based on growth of 9,794 workforce jobs in Chelmsford across all sectors over the period 2022-2041. Of these, 2,367 are in office-, industrial- and distribution-based sectors. Growth is led by office-based sectors, while B2 manufacturing employment is projected to decline over the period. Scenario 1 sits between the other scenarios and is consistent with historic employment growth rates. The ELRFU (**ECON003**) recommends this scenario remains the basis for the minimum requirement (paragraph 3.17, page 19).

176. The gross employment space requirements in Chelmsford from the ELRFU (**ECON003**) are summarised in the table below:

Table 1 Gross employment space requirements in Chelmsford, 2022-2041

Type of Space/Use Class	**Floorspace (sq.m)**			**Land (ha)**		
	Scenario 1	**Scenario 2**	**Scenario 3**	**Scenario 1**	**Scenario 2**	**Scenario 3**
Office (E(g)(i)/(ii)	38,053	12,486	139,913	5.7	1.9	21.0
Industrial and distribution (E(g)(iii)/B2/B8)	48,280	-35,223	140,845	12.1	-8.8	35.2
Total	**86,333**	**-22,737**	**280,758**	**17.8**	**-6.9**	**56.2**

Justification and consistency with national policy

177. Considering a range of scenarios means the evidence within the ELR and ELRFU is consistent with national policy, namely PPG on economic need assessment, as summarised above. As is to be expected when adopting different methodologies, the three scenarios produce a range of requirements, ranging from -22,737 sq.m to 280,758 sq.m over the period 2022-2041.

178. In the ELR (**ECON002**), Scenario 1 (labour demand) was recommended to form the minimum requirement (107,470 sq.m), as it was considered that Scenario 2 (past development rates) did not adequately reflect commercial market feedback, and would not sufficiently represent positive planning. In the ELRFU (**ECON003**), Scenario 2 resulted in a negative requirement for employment space over the plan period, which likewise would not represent positive planning.

179. Scenario 3, as a supply-led, policy-on figure, assumes enough local jobs are created to match growth in the resident workforce, implying growth in workforce jobs of 1,400 per annum. This is significantly above past trends in workforce jobs growth in Chelmsford, and as such while it would imply alignment between housing and jobs targets, it was not considered to represent a realistic minimum.

180. The minimum requirement recommended by the ELRFU (**ECON003**) was therefore Scenario 1, of 86,333 sq.m or 17.8 ha (gross). The Local Plan allocation of 176,751 sq.m of employment floorspace (in addition to extant planning permissions) is in excess of the ELRFU's minimum requirement by 90,418 sq.m. The allocated area sits between Scenario 1 and the higher requirement implied by growth in labour supply under Scenario 3, promoting closer alignment between employment and housing requirements over the plan period.

181. The Council's monitoring data on the supply of employment floorspace as of September 2026 **(ECON006)** is compared to the Scenario 1 minimum requirement in the table below.

Table 2 Comparison of allocations and committed supply against ELRFU (**ECON003**) minimum requirement (sq.m)

Use class	Total allocations	Extant permissions	Total supply	Minimum requirement	Surplus (+) / Shortfall (-)	% of requirement
Office and R&D (E(g)(i)/(ii)	84,590	-10,518	74,702	38,053	+36,019	195%
Industrial and distribution (E(g)(iii)/B2/B8)	92,161	26,618	118,779	48,280	+70,499	246%
Total	**176,751**	**16,100**	**192,851**	**86,333**	**+106,518**	**223%**

182. Meanwhile, compared to Scenario 3 (labour supply) the Local Plan allocations and extant permissions meet 53% of office and R&D needs and 84% of industrial and distribution needs, equivalent to 69% of the overall requirement under this (higher) scenario **(ECON006)**. As such, the Local Plan provides well in excess of the identified minimum requirement, by more than double, while it also meets over two-thirds of the higher labour supply-aligned requirement.

183. The evidence base documents underpinning the employment requirements for Chelmsford – namely the ELR (**ECON002**) and ELRFU (**ECON003**) – are consistent with national policy as set out in the December 2023 NPPF and the accompanying PPG on housing and economic need assessment, as:

- Both documents (**ECON002** and **ECON003**) are based on proportionate, up-to-date evidence as per NPPF paragraphs 31 and 35b.
- Both the ELR (**ECON002**) and ELRFU (**ECON003**) take account of market signals, consistent with NPPF paragraph 31 and PPG paragraph 2a-026. They consider national and regional market trends, take-up by unit size, the age, quality, availability, vacancy and rents of existing office and industrial stock, and feedback from local commercial property agents.
- Reasonable alternatives are considered through the use of three scenarios (labour demand, past development rates, and labour supply), consistent with PPG paragraph 2a-027 and NPPF paragraph 35b. The justification for recommending Scenario 1 as the basis for planning is clearly presented and validated against historic trends.
- Needs are considered within the context of Chelmsford's FEMA (Chelmsford, Maldon and Braintree), and wider links are also identified with Brentwood, Basildon and Greater London, recognising that FEMAs can cross administrative boundaries. This is consistent with PPG paragraphs 2a-025 and 2a-026a.
- The ELR (**ECON002**) and ELRFU (**ECON003**) convert workforce and population forecasts to floorspace and land requirements using sector-to-use-class mapping, the latest published employment densities, a vacancy allowance, and clearly defined plot ratios. This is consistent with PPG paragraph 2a-030.
- The assessment of the supply-demand balance and site review is consistent with PPG paragraphs 2a-028 and 2a-029.
- The recommended requirement is a minimum requirement, including a safety margin, in alignment with NPPF paragraphs 85 and 86d. The ELR (**ECON002**) and ELRFU (**ECON003**) recommended land be allocated flexibly across E(g), B2 and B8 Use Classes, which the Local Plan does.

184. Overall, it is considered that the employment land evidence base documents are justified and consistent with national policy. The requirement implied by the evidence is used as a minimum, and the Plan provides more than double the identified need through flexible allocations, and with the aim of supporting a better balance between homes and jobs. The Plan gives significant weight to economic growth, as required by paragraph 85 of the NPPF.

Note on strategic logistics

185. The ELR (**ECON002**) and ELRFU (**ECON003**) assess Chelmsford's locally arising (indigenous) employment land needs. This includes smaller-scale and 'final mile' distribution floorspace, consistent with NPPF paragraph 87, but excludes larger, strategic facilities meeting regional- and/or national-level logistics needs. Paragraph 2a-031 of the PPG advises that the need space for strategic logistics should be assessed separately from general industrial land by authorities working together across the relevant market area.

186. As such, it has not been considered appropriate, or proportionate, to assess this unilaterally within a single-authority ELR. The ELR (**ECON002**) also found no evidence, from past take-up or from local agents' feedback, that regional strategic demand has been a significant driver of Chelmsford's commercial market **(ECON002, paragraphs 3.31 and 4.38-4.39).** The Council has not been approached by other authorities within the FEMA, nor the Greater London Authority, to undertake such an assessment through the Duty to Cooperate/requirements for engagement. However, this evidential position does not prevent or preclude development for strategic logistics. Indeed, SGS16b has been allocated as a *"strategic, stand-alone employment site"*, recognising that the development *"will make an important contribution to the delivery of employment and jobs in the City Council's area over the plan period"* **(SD001, paragraph 6.47)**.

EVIDENCE BASE LIST FOR MATTER 3	
SD001	Pre Submission (Regulation 19) Local Plan Consultation Document
SD002	Focused Consultation Additional Sites (Regulation 19) Document 2025
SD005	Schedule of Proposed Modifications (June 2026)
SD008	Pre-Submission Integrated Impact Assessment (January 2026)
SD009	Integrated Impact Assessment: Additional Sites (Regulation 19) addendum (November 2025)
TP006	Pre-Submission Employment Topic Paper February 2025
TP009	Submission Topic Paper Housing (May 2026)
TP010	Submission Topic Paper Spatial Strategy and Strategic Sites (May 2026)
TP014	Submission Employment Topic Paper May 2026
PO003	Preferred Options Consultation Document 2024
ECON002	Employment Land Review December 2023
ECON003	Chelmsford Employment Land Review Focused Update December 2024
ECON005	Essex Sector Development Strategy
ECON006	September 2026 Employment Supply Figures
AH001	Chelmsford Strategic Housing Needs Assessment
AH004	Strategic Housing Needs Assessment
AH005	Mechanism for the Consideration of Unmet Housing Need
AH006	Mechanism for the Consideration of Unmet Gypsy and Traveller Need
OSP014	Our Chelmsford, Our Plan (February 2024)
OSP015	Adopted Chelmsford Local Plan
OSP020	Minister of State Matthew Penncook's letter to the Planning Inspectorate
CC002	Water Cycle Study, Scoping 2024
CC022	Climate and Ecological Emergency Action Plan 2019
LDS003	Local Development Scheme 2025-2028 (October 2025)
LDS012	Five Year Housing Site Schedule (April 2026)
LDS021	Gypsy and Traveller Trajectory (April 2026)
SOCG013	Statement of Common Ground with Castle Point Borough Council March 2026
SOCG027	Statement of Common Ground with Basildon Borough Council April 2026
SOCG030	Statement of Common Ground with Southend-on-Sea City Council March 2026
SHELAA001	Strategic Housing and Employment Land Availability Assessment
IO001	Issues and Options Consultation Document 2022
T001	Transport Impact Appraisal of Spatial Approaches December 2023

T002	Transport Impact of Preferred Spatial Approach March 2024
T002-A	Preferred Spatial Approach Local Junction Modelling – Technical Note 2024



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