HS007 Matter 7

Chelmsford Local Plan

Examination Hearing Statement – City, Town and Neighbourhood Centres and Community Assets

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 7 – City, Town and Neighbourhood Centres and Community Facilities	
Issue 1	**Whether the Plan will contribute to the vitality and viability if City, Town, and Neighbourhood Centres**
	Policy S12 – Role of City, Town and Neighbourhood Centres
Q7.1	**Is the retail hierarchy and network of centres informed by up-to-date evidence?**

CCC Response to Q7.1

4. It is the Council's position that the retail hierarchy in Policy S12 is supported by up-to-date evidence. The plan is supported by a Retail Capacity Study update from July 2023 **(ECON001).** This study is still considered robust and nothing fundamental has changed since 2023. However, to make sure the study is up-to-date, the Council sought additional advice from its retail consultant. The Chelmsford – Town Centre Composition Update October 2026 is now available **(ECON001-A)**.

5. **ECON001-A** draws on the latest Experian Goad Category Reports for:

   - Chelmsford City Centre – surveyed by Experian on 10 June 2025; and
   - South Woodham Ferrers Town Centre – surveyed by Experian on 8 January 2026.

6. As set out in para 6.3, page 11 (pdf page 11) of **ECON001-A**, '*the latest available data confirms, rather than alters, the findings of the 2023 Study* **(ECON001)** *in respect of the two main centres*' (Chelmsford and South Woodham Ferrers). '*The retail hierarchy and network of centres set out in Policy S12 remains justified, and the policy recommendations in Chapter 6 of the 2023 Study remain appropriate. These include our advice on centre boundaries and Primary Shopping Areas, the flexible approach to Class E uses within centres and the local impact threshold*'.

7. **ECON001-A** does not include Neighbourhood Centres but in paragraph 6.5, page 11 (pdf page 11) it states '*We would not expect any material change in their role, given that they mainly serve day-to-day local needs around a single foodstore'* (**ECON001, paragraph 5.88, page 59, pdf page 59)**.

8. The Council considers that Policy S12 is sound and informed by up-to-date evidence.

Q7.2	**Does the Plan provide for access to the various centres by sustainable and active travel modes?**

CCC Response to Q7.2

9. It is the Council's position that the Plan provides for access to the various centres by sustainable and active travel modes. This is demonstrated through a number of Strategic Policies and individual site policies which together ensure new development will be designed to prioritise and maximise opportunities for active travel and sustainable transport to key destinations including various centres.

10. It is considered that Chelmsford's various centres already have good accessibility by sustainable and active travel modes. For more information, refer e.g. to:

- The Transport section in the Pre-Submission (Regulation 19) Local Plan **(SD001 paragraphs 2.20-2.23, pages 26)**
- The Council's Transport Topic Paper **(TP012, paragraphs 3.21-3.33, pages 8-11, pdf pages 10-12)**
- The Council's Retail Capacity Study Update 2023, especially the Accessibility sections in the Town Centre Health Check Assessments chapter covering the City Centre, South Woodham Ferrers Town Centre and the Principal Neighbourhood Centres (**ECON001, pages 48-77)**
- A Parish Audit of local services and facilities in the parishes carried out to support the plan **(PL002, Appendix 1,** the third column for each settlement shows which key centres are served by regular and direct bus services).

11. The Plan builds upon what is already in place across Chelmsford ensuring opportunities to promote walking, cycling and public transport are identified and pursued in line with paragraph 108 of the NPPF. This is underpinned by Strategic Priority 2 – Promoting smart, active travel and sustainable transport and Strategic Policy 1 – Spatial Principles, bullet a) which seeks to locate development at well connected and sustainable location (**SD001, page 46)**.

12. Strategic Policy S9 in the Pre-Submission (Regulation 19) Document **(SD001, page 86)** sets out requirements under Transport and Highways for new and improved active and sustainable travel routes and bridges both within development sites and to provide connections to centres and hubs of activity such as transport nodes, City,

Town and Neighbourhood Centres, strategic areas of recreation and employment areas, education and health centres.

13. Individual site policies set out requirements for sustainable and active travel. An example is provided below for Strategic Growth Site Policy 16a East Chelmsford Garden Community (Hammonds Farm) **(SD001, page 200).** This includes requirements for:

- Well-connected internal road layouts which allow good accessibility for bus services and bus priority measures
- The provision and enhancement of pedestrian and cycle connections within the site including links to Chelmsford City Centre and Danbury
- An effective movement strategy for all users within the site and beyond, safe multi-user access routes under and over the A12 and bus based rapid transit infrastructure
- Site-wide travel plan(s) which will be expected to incorporate strategic measures which reduce the need to travel and encourage people to make sustainable travel choices, and demonstrate a 60% modal share for active and sustainable transport **(SD001, paragraphs 7.365 and 7.366).**

14. Strategic Policy S16 – Connectivity and Travel **(SD001, page 83**) promotes active and sustainable transport. Part A of this policy requires new development to be designed to prioritise and maximise opportunities for active and sustainable transport and movement, through strategic and local sustainable measures. The first bullet point requires developments to promote ease of movement within the site and improve connectivity to adjoining areas and key destinations.

15. Paragraph 6.68 in the Reasoned Justification to Strategic Policy S16 **(SD001, page 85)** states that '*Ease of movement within any site and improved connectivity to adjoining areas and key destinations to support daily life is essential in achieving a reduction of private vehicles trips and increased uptake of active and sustainable transport options. For the purposes of this policy key destinations include, but are not limited to, City/Town/Village Centres, transport hubs, schools and post 16 education, medical facilities, shops, community facilities (including sport and leisure services), places of worship and places of work*'.

16. Strategic Policy S17 – Future of Chelmsford City Centre **(SD001, page 99)** includes a key principle (D. Climate and Sustainability) requiring new proposals to contribute towards sustainable options for accessing the City Centre, whether on foot, two wheels, by bus or by rail, thereby reducing reliance on private vehicles to reduce carbon emissions and congestion.

17. The Local Plan is supported by Essex County Council's Local Cycling and Walking Infrastructure Plans (LCWIP). As set out in the Council's Transport Topic Paper (**TP012, paragraph 3.27, page 10**), the Chelmsford LCWIP **(T012)** identifies a cycling network comprising 20 routes and a walking network comprising 21 routes. Work is underway to prioritise and deliver further schemes to supplement those already

delivered through the Government's Active Travel Fund as listed in para 3.29 of **TP012 (page 10, pdf page 11).**

18. The Council considers that the Plan is sound and provides for access to the various centres by sustainable and active travel modes through its various policies including site-specific allocations.

Q7.3	**Will the Policy be effective in responding to changing retail and Market conditions?**

CCC Response to Q7.3

19. It is the Council's position that Strategic Policy S12 will be effective in responding to changing retail and market conditions.

20. **ECON001-A** (paragraph 3.3, page 5) concludes that '*Overall, the structural trends identified in the 2023 Study* **(ECON001)** *continued growth in online shopping, a shift in town centre composition from comparison retail towards leisure and services, and subdued real growth in convenience spending have continued rather than reversed*'.

21. **ECON001-A** (paragraph 6.4, page 11) notes that '*The two main centres have adapted to market change since 2022 without any increase in overall vacancy'.* In fact, retail services have increased in Chelmsford City Centre, vacancy rates have fallen and leisure services have continued to grow with a broader offer (paragraphs 4.2-4.7, pages 6-7). In South Woodham Ferres, vacancy rates have fallen and are well below the UK average, comparison retail has recovered slightly and leisure is in line with the national average (paragraph 5.2, page 9, pdf page 9).

22. The findings of **ECON001-A** support '*the 2023 Study's recommendation of a flexible policy framework that supports a range of main town centre uses while protecting the vitality of the Primary Shopping Areas'* (para 6.4, page 11, pdf page 11).

23. Strategic Policy S12 of **SD001** is supported by Policy DM5 Designated Centres **(SD001, page 250, pdf page 250)**. Para 8.64 in the Reasoned Justification to Policy DM5, page 251 (pdf page 251) explains that '*Town and city centres will continue to evolve to meet the needs and demands of their changing populations and customers over the plan period. Alongside the ongoing growth of online shopping, the impact of the Covid 19 pandemic has resulted in a shift in footfall alongside spending habits. A wider range of uses will therefore be encouraged including leisure, culture, entertainment and retail uses in order to maintain the attractiveness of our town and city centres and enhance the range of services they offer*'.

24. The Council considers that Strategic Policy S12 is sound and will provide flexibility to respond to changing retail and market conditions.

Q7.4	**Overall does the Plan set out a positively prepared, justified and effective mechanism to support the economy and the vitality and viability of the City, Town and Neighbourhood Centres? Are any modifications necessary for soundness?**

CCC Response to Q7.4

25. It is the Council's position that the Plan sets out a positively prepared, justified and effective mechanism to support the economy and the vitality and viability of the City, Town and Neighbourhood Centres.

26. Strategic Policies S12, S17 and Policy DM5 together provide support for the economy and vitality and viability of the various centres. They are in turn supported by the Retail Capacity Study Update 2023 **ECON001** and the Chelmsford – Town Centre Composition Update October 2026 (**ECON001-A)**. The findings of **ECON001-A** support '*the 2023 Study's recommendation of a flexible policy framework that supports a range of main town centre uses while protecting the vitality of the Primary Shopping Areas'* (paragraph 6.4, page 11 of The October 2026 Update).

27. Strategic Policy S12 **(SD001, page 97)** provides a hierarchy of designated centres starting with Chelmsford City Centre at the highest tier and the Local Neighbourhood Centres at the lowest tier. New main town centre uses and development will be directed to the appropriate centre in accordance with this policy where Chelmsford City Centre in particular will be the main focus for town centre uses as defined by the NPPF (Annex 2: Glossary, page 72, pdf page 72)

28. Strategic Policy S12 is supported by Policy DM5 **(SD001, page 250)** which provides detailed requirements for planning applications in Primary Shopping Areas, Chelmsford City Centre and South Woodham Ferrers Town Centre and Principal and Local Neighbourhood Centres respectively. A wide range of uses is encouraged in Primary Shopping Areas including leisure, culture, entertainment and retail uses in order to maintain the attractiveness of our town and city centres and enhance the range of services they offer. Outside of Primary Shopping Areas, including areas within the town or city centre areas, a more flexible approach to proposals will be taken to support a broader range of uses. The extent of the Primary Shopping Areas and the designated centres are all defined on the Proposals Map **(SD001, page 350 onwards)**.

29. The Council considers this approach is consistent with Chapter 7 – Ensuring the vitality of town centres of the NPPF 2023, in particular paragraph 90.

30. Strategic Policy S17 – Future of Chelmsford City Centre **(SD001, page 99)**, alongside the Strategic Growth Site allocations in the City Centre, provide the policy framework for the proposed regeneration of the City Centre. It comprises five thematic principles covering Economy, Culture and Heritage, Living in the City Centre, Climate and Sustainability and Waterways which contain additional requirements for development

proposals. It states under Economy that '*Proposals which increase footfall and encourage visitors to enjoy the City Centre for longer by visiting a number of venues and events which cater for all their needs will be supported'*.

31. Strategic Policy S9 **(SD001, page 86)** and individual site policies provide additional support for the economy and vitality of the centres by promoting sustainable and active travel to key destination such as City, Town and Neighbourhood Centres.

32. The Council considers that the above policies are sound and set out a positively prepared, justified and effective mechanism to support the economy and the vitality and viability of the City, Town and Neighbourhood Centres. The Council considers that no modifications are required for soundness.

	Policy S17 – Future of Chelmsford City Centre
Q7.5	**Is the proposed regeneration framework for the City Centre justifiable and deliverable?**

CCC Response to Q7.5

33. It is the Council's position that the proposed regeneration framework for the City Centre is both justifiable and deliverable.

34. Strategic Policy S1 – Spatial Principles **(SD001, page 46)** highlights the importance of the continued renewal, enhancement of vitality of Chelmsford City Centre.

35. Strategic Policy S17 – Future of Chelmsford City Centre alongside the City Centre Strategic Growth Site allocations **(SD001, page 99)** then provide the policy framework for the proposed regeneration of the City Centre. A more granular detailed City Centre Strategy will be prepared which supports the wider implementation of the regeneration framework.

36. The regeneration framework brings together five thematic principles covering Economy, Culture and Heritage, Living in the City Centre, Climate and Sustainability and Waterways which contain additional requirements for development proposals. These principles feed into site specific principles and opportunity corridors.

37. The economic principles are informed by the Retail Capacity Study **(ECON001, Paragraph 5.57, page 53).** As part of this study a health check assessment has been undertaken. This concludes that:

    a. Significant increase in food and beverage sector, which strengthens the evening economy, although there are limited family friendly options and activities
    b. Relative lack of smaller flexible units
    c. Lack of distinct community space which restricts potential to host and support events.

d. Public Ream Improvements, cycling and walking upgrades and public car parking rationalisation.

38. The Chelmsford Cultural Strategy **(PL022)** provides more insights for the delivery of cultural benefits for the city centre. This focuses on nurturing the built and natural environment, Improving Health and Wellbeing and Outstanding Festivals and Events.

39. A key part of the regeneration of the City Centre is encouraging more people to live there. Whether that is through better use of upper floors of commercial buildings, changes of use of existing buildings or wider regeneration and new build. Strategic Policy S17 recognises that some of these sites are allocated in the Local Plan but there could opportunities for others that could come forward as 'windfall' and it is important that they reflect and accord with the principles in Strategic Policy S17.

40. The Climate and Sustainability principle focuses on active and sustainable transport options and sets outs the considerations required for new proposals to ensure that connectivity, parking and green infrastructure provision are set within a City Centre context.

41. Chelmsford's waterways are integral to the morphology, character and nature of the City Centre. In the past, new development has not acknowledged this importance and at worst ignored it. This is set out in the Chelmsford Plan for Improving Rivers and Waterways in around Chelmsford **(PL021).** As such Strategic Policy S17 adds more detailed requirements for City Centre proposals to address the opportunities for recreation, flood management, greening, habitat creation, active travel and renewable energy initiatives.

42. Three sites are identified in Section F of Strategic Policy S17 which address many of the principles identified and supported by the plan's evidence base and sets them within a wider context of the City Centre. Section G widens that further to Opportunity Corridors, covering Knowledge and Learning, Living and Leisure, Recreation and Green Space, Culture and Travel and High Tech and Regeneration.

43. Strategic Policy S17 proposes that a more detailed City Centre Strategy is produced to implement the principles and objectives of the policy.

44. It is the Council's contention that the proposed regeneration framework for the City Centre is justified. A number of evidence base reports support the approach and using a more place-based approach and area-focused principles allow for more control to nurture developments in the City Centre. The content of Strategic Policy S17 is deliverable as the policy states that the Council will place significant weight in decision making on the contribution they have to the five principles. They will apply where they are relevant to the specific development being proposed.

Q7.6	**Are modifications necessary for soundness?**

CCC Response to Q7.6

45. It is the Council's position that no modifications are required for soundness.

	Policy DM4 – Employment Areas and Rural Employment Areas
Q7.7	**Does the Policy strike an appropriate balance between protecting employment land and allowing for changing economic circumstances?**

CCC Response to Q7.7

46. It is the Council's position that Policy DM4 **(SD001, page 248)** strikes an appropriate balance between protecting employment land and allowing for changing economic circumstances. In doing so, the policy will provide the flexibility that businesses often require.

47. The policy safeguards existing and proposed new employment areas to maintain an adequate supply and choice of employment floorspace whilst at the same time enabling flexibility for non-Class E(g), B2 and B8 uses where they provide employment opportunities and add to the character, mix and vitality of the area.

48. Policy DM4 also supports improvements to employment areas including their infrastructure, amenities and accessibility. This will ensure that employment areas can evolve over time, remain commercially attractive and continue to meet the changing needs of occupiers and market demand. Infrastructure improvements are also supported by the Employment Land Review 2023 **(ECON002, paragraph 7.24)**.

49. In addition, Policy DM4 should be read alongside other policies in the Local Plan. These include Strategic Policy S8 – Delivering Economic Growth **(SD001, page 81)** which promotes economic diversification and Policy S7 - The Spatial Strategy **(SD002, page 64)** which allocates a range of flexible employment allocations of different sizes, types and locations providing a portfolio of economic opportunities that can adapt to market changes over the life of the Local Plan.

50. The Council considers that Policy DM4 is sound and will provide flexibility to respond to varying economic circumstances whilst protecting employment sites over the plan period.

Issue 2	**Is the approach to delivering and protecting community facilities justified and effective?**
	Policy S5 – Protecting and Enhancing Community Assets
Q7.8	**Is the approach to protecting and enhancing community facilities justified and effective?**

CCC Response to Q7.8

51. It is the Council's position that the approach to protecting and enhancing community facilities set out in Strategic Policy S5 and Policies DM20, DM21 and DM22 **(SD001, Pages 65 and 280 to 284)** is justified and effective.

52. The Council considers this approach is consistent with Chapter 8 – Promoting healthy and safe communities of the National Planning Policy Framework **(NPPF, December 2023, Pages 28 - 30)**, in particular Paragraphs 96, 97, 99, 100 and 102.

53. Strategic Policy S5 is consistent with Paragraphs 97a and 97d of the **NPPF** by planning positively for community facilities by recognising the important role that community facilities have in existing communities including health, police, education, police, education, social, sports and leisure, parks and green spaces, arts and cultural facilities, and that they are an integral part of any proposals for new residential and employment development. Strategic Policy S5 also requires that new or extended facilities will be accessible to the communities they serve and by a range of active and sustainable transport. This ensures an integrated approach to considering the location of housing, economic uses and community facilities and services; and ensuring that established shops, facilities and services are retained for the benefit of the community as stated in **NPPF**, Paragraph 97d.

54. This integrated approach that provides for new community facilities and protects existing community facilities is also consistent with Paragraph 96a and 96c of the **NPPF** by promoting social interaction and enabling and supporting healthy lifestyles through the provision of community facilities, including sports and leisure, parks and green spaces, that are accessible to communities they serve and by a range of active and sustainable transport.

55. Strategic Policy S5 is consistent with Paragraph 97b of the **NPPF** as it has been informed by the Chelmsford City Council Infrastructure Delivery Plan – Stage 3 Infrastructure Delivery Plan to Support the Submission Local Plan **(INF012)** which has taken into account and supports the delivery of local strategies to improve health, social and cultural well-being for all sections of the community, as stated in Paragraph 97b of the **NPPF**.

56. Strategic Policy S5 is consistent with Paragraphs 97c and 97d of the **NPPF** by protecting existing community assets from inappropriate changes of use or redevelopment.

57. Strategic Policy S5 is also consistent with Paragraph 102 of the **NPPF**. Strategic Policy S5 recognises the important role that community facilities have in existing communities including sports and leisure, and parks and green spaces.

58. Policy DM20 is consistent with Paragraphs 96a and 96 c of the **NPPF** in relation to delivering new community facilities or extensions to existing facilities and services that promote social interaction, and enable and support healthy lifestyles including where there is access to adequate cycling and walking links. Policy DM20 is also consistent with Paragraphs 97a, 97d and 97e of the **NPPF** by: planning positively for the provision and use of shared spaces, community facilities and other local services; ensuring that established shops, facilities and services are able to develop and modernise; and ensuring an integrated approach to considering the location of housing, economic development and community facilities and services.

59. Policy DM21 is consistent with Paragraphs 97c and 97d of the **NPPF** in relation to guarding against the loss of valued facilities and services, and ensuring that established shops, facilities and services are retained for the benefit of the community.

60. Policy DM22 is consistent with Paragraphs 99 and 100 of the **NPPF** in relation to the extension and expansion of existing educational facilities, including further and higher education establishments.

Q7.9	**For soundness, should *fire and rescue* be added to the list of community assets in the policy and paragraph 5.58?**

CCC Response to Q7.9

61. It is the Council's position that for clarity 'fire and rescue' should be added to the list of community assets in Policy S5 **(SD001, Page 65)** – **MOD Ref 56 (SD005)**.

62. The Council also considers that for clarity 'resilient' should also be added to the first sentence of Paragraph 5.58, and 'fire and rescue' should also be added to the list of community assets – **MOD Ref 57 (SD005)**.

63. The Council considers that Policy S5 is sound, subject to **MOD Ref 56** and **MOD Ref 57 (SD005)** which are proposed to improve the clarity and effectiveness of the policy.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
56	65	-	Strategic Policy S5	*Amend first sentence:* The Council recognises the important role that community facilities have in existing communities including health, police, fire and rescue, education, social sports and leisure, parks and green spaces, arts and cultural facilities.	For clarity and ensure the plan is effective.
57	65	-	Strategic Policy S5 Paragraph 5.58	*Amend first sentence:* An important element of sustainable development and creating safe, cohesive, resilient and sustainable communities is the provision and protection of community uses such as schools, health, police, fire and rescue, and recreation, education, community halls, pavilions, scout huts, places of workshop and other cultural buildings at locations that are readily accessible.	For clarity and ensure the plan is effective.

	Policy DM20 – Delivering Community Facilities
Q7.10	**Should part i. of Policy DM20 be amended to refer to existing or proposed public transport, cycling and walking links? How would any proposed links be secured?**

CCC Response to Q7.10

64. It is the Council's position that Part i of Policy DM20 **(SD001, page 280)** lacks clarity and should be amended to include reference to access to adequate 'existing or proposed' public transport, cycling and walking links – **MOD Ref 287 (SD005)**.

65. Proposed improvements to public transport services and cycling and walking infrastructure will be secured through planning obligations and/ or highway

agreements having regard to the Transport Assessment and Travel Plan submitted in support of planning applications. Where appropriate, Section 106 agreements will secure financial contributions towards new or improved public transport services and active travel infrastructure (cycling and walking). Where works are required within the public highway, these may be delivered through Section 278 agreements, including but not limited to, off-site highway improvements, capacity enhancement measures, junction improvements, and walking and cycling infrastructure, to the satisfaction of the Highway Authority.

66. In addition to developer contributions through Section 106 agreements, funding may also be available from the Council's Community Infrastructure Levy (CIL) and from other sources where available such as Essex County Council as the local transport authority, bids for Department for Transport funding, Active Travel England, Network Rail, and train and bus service operators.

67. Strategic Policy S10 - Securing Infrastructure and Impact Mitigation **(SD001, page 93)**, provides the policy mechanism in the Plan in which to secure necessary infrastructure, including any such links required to support a development, in an appropriate and timely manner.

68. The Council considers that Policy DM20 is sound, subject to **MOD Ref 287 (SD005)** which is required to ensure the policy is clear and effective.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
287	280	-	Policy DM20	*Amend part i:* There is access to adequate <u>existing or proposed</u> public transport, cycling and walking links for the benefit of non-car uses; and	For clarity.

Q7.11	**Are changes to the policy and paragraph 8.178 needed to facilitate the flexible/ shared use of new community facilities?**

CCC Response to Q7.11

69. The Council considers that modifications are required to part vi of Policy DM20 and the last sentence of paragraph 8.178 to facilitate the flexible/shared use of new community facilities.

70. Part vi of Policy DM20 **(SD001, page 281)** would be clearer if repositioned within the policy as a standalone penultimate paragraph – **MOD Ref 288 (SD005)**. The new paragraph requires that new buildings and extensions should be flexible in design and sited to maximise the potential for the shared use of a facility.

71. The Council acknowledges that, as originally worded, part vi would require all community buildings to be flexible and does not recognise that there may be circumstances where it is necessary for the design of a community facility to be fixed in relation to the primary use of the building or facility, e.g. some sports and recreation venues such as swimming pools. However, the Council considers that there will be opportunities, even in those circumstances, to ensure that indoor and/ or outdoor spaces can have multiple uses and/ or shared uses over time. This can include on-site meeting rooms, public entrance areas, cafes, gardens, etc. In addition, consideration of the orientation of buildings and main entrances at the design stage can facilitate flexible/ shared use in the future.

72. The last sentence of Paragraph 8.178 is proposed to be modified to clarify that maximising the potential for the shared use of a facility is to support sustainability – **MOD Ref 289 (SD005)**.

73. The Council considers that Policy DM20 is sound, subject to **MOD Refs 288 and 289 (SD005)** which are required to Policy DM20 and Paragraph 8.178 to ensure the policy is effective.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
288	280	-	Policy DM20	*Delete part vi:* *Insert a new penultimate paragraph:* <u>New buildings and extensions should be flexible on design and sited to maximise the potential for the shared use of a facility</u>	For clarity.
289	281	-	Policy DM20 Paragraph 8.178	*Amend last sentence:* Proposals should also be flexible in design and sited to maximise the potential for the shared use of a facility <u>to support sustainability</u>.	For clarity.

	Policy DM21 – Protecting Community Facilities
Q7.12	**For the purposes of Policy DM21, what would be the basis for deciding whether a commercial use would constitute a 'locally valued community facility'?**

CCC Response to Q7.12

74. It is the Council's position that the basis for deciding whether a commercial use would constitute a 'locally valued community facility' would be the same analysis of the need for the community facility as explained in Paragraph 8.183 of the reasoned justification to Policy DM21 **(SD001, page 283)**.

75. As set out in Paragraph 8.183 of the Local Plan an analysis of need would be undertaken for the community facility on a case-by-case basis, taking account of the type of asset and any existing provisions. The term 'local' will differ between circumstances, i.e. depending on the type of facility and it's catchment area.

76. The Council considers that Policy DM21 is sound.

Q7.13	**What is the basis for the inclusion of livery yards in the policy, and the specific requirements for those particular uses contained in paragraph 8.186?**

CCC Response to Q7.13

77. Livery yards are locally valued facilities which along with show centres and riding schools provide a facility for the equestrian community. Livery yards support local equestrian networks and provide accessible recreational opportunities. They also contribute to the rural economy by providing local employment.

78. The Council considers that due to the increasing number of planning applications for the change of use of livery yards to alternative uses it is appropriate for Policy DM21 to include livery yards and for specific requirements for them to be included in paragraph 8.186 **(SD001, pages 282 – 283)**.

79. Paragraph 8.186 sets out details of the specific evidence that will need to be submitted to the Council with proposals for the change of use of livery yards. This evidence will enable the Council to consider if the proposal can demonstrate:

- That the existing use as a livery yard is not economically viable (see paragraph 8.186, bullet point 3); and
- That the facility or service which will be lost as a result of the change of use of the livery yard will be adequately supplied or met by an existing or new facility in the locality (see paragraph 8.186, bullet points 1 and 2).

80. The Council considers that Policy DM21 is sound.

	Policy DM22 – Education Establishments
Q7.14	**In the last sentence of Policy DM22, what is the justification for requiring proposals for the expansion of Anglia Ruskin University to be considered in the context of agreed masterplans?**

CCC Response to Q7.14

81. It is the Council's position that it considers that masterplans are the most appropriate mechanism for ensuring that all new major development is planned comprehensively and delivers well-designed, high quality, sustainable developments in accordance with site specific policies and the wider spatial strategy of the Local Plan.

82. Policy DM24 – Design and Place Shaping Principles in Major Developments in the Local Plan **(SD001, pages 287 - 288)** requires all new major development to be of high quality built form and urban design and to reflect the principles set out in the policy. The second part of Policy DM24 requires the use of masterplans by developers. Paragraph 9.18 of the reasoned justification for Policy DM24 states: '*The Council will require masterplans to be formulated to shape new strategic development allocations*.'

83. The preparation and approval of masterplans is a long-established means of securing high quality development in Chelmsford. The Adopted Chelmsford Local Plan **(OSP0015)** requires the production of masterplans for all the Strategic Site allocations within the Plan. The Council also has a Masterplan and Development Framework Procedure **(PL033-A)** which it has operated since 2019. The Procedure has been reviewed over time, most recently in October 2026 to reflect experience gained from implementing the procedure and to ensure that it remains effective, proportionate and aligned with the submitted Local Plan and current working practices. Approved masterplans will be a material consideration alongside the Local Plan to ensure that Strategic Growth Sites and Growth Sites deliver the Spatial Strategy and site allocation policies.

84. The requirement for proposals for expansion of Anglia Ruskin University to be considered in the context of agreed masterplans is consistent with the approach the Council has taken in the policies for Strategic Growth Sites[1] that are large or complex. These policies require the development to be in accordance with an approved masterplan.

[1] See Strategic Growth Site Policies 1b, 2, 3a, 3b, 3c, 6, 7a, 7b, 7c, 8, 9a, 10, 15, 16a, 16b in the Local Plan **(SD001, pages 119, 145, 148, 152, 155, 167, 177, 181, 184, 188, 191, 214, 196, 200, 211)**.

85. Policy SPA6 – ARU Writtle Special Policy Area **(SD001, page 233)** sets out the nature of development that will be permitted within the Policy Area having regard to national policy on Green Belt. The second paragraph of Policy SPA6 sets out the site principles to be considered when preparing development proposals within the Policy Area. The intention is that these development proposals will guide the preparation of a masterplan to be approved by the Council prior to the submission of an outline planning application.

86. The Council considers that for clarity and for consistency with the Strategic Growth Site Policies in the Local Plan, the last sentence of Policy DM22 should be amended to refer to an approved masterplan for Policy SPA6.

87. A similar amendment should also be made to Policy SPA6 and a new sentence added to the end of Paragraph 7.482 of the reasoned justification for Policy SPA6 to ensure clarity and consistency.

88. The Council considers that Policy DM22 is sound, subject to new modifications which are required to Policy DM22, Policy SPA6 and Paragraph 7.482 to ensure the policies are effective.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
NEW	284	-	Policy DM22	*Amend last sentence of policy:* Development ~~P~~proposals for the expansion of ~~Anglia Ruskin University~~ ARU Writtle will ~~be considered in the context of agreed~~ accord with a masterplan~~s~~ approved by the Council (refer to Policy SPA6 – ARU Writtle Special Policy Area).	For clarity and consistency.
NEW	233	-	Policy SPA6	*Amend the last sentence of policy:* Development proposals for the expansion of ARU Writtle will accord with a masterplan approved by the Council. The ~~SPA~~ masterplan should include proposals to maintain National Cycle Route 1 which runs through the site.	For clarity and consistency.

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
NEW	233 and 234	-	Paragraph 7.482	*Add new sentence to the end of the paragraph:* Development will be considered in the context of an approved masterplan to address the nature, form, density, massing, design and phasing of the new development.	For clarity and consistency.

Q7.15	**Is the proposed additional text in paragraph 8.190, relating to redevelopment of school sites, needed to make the policy effective?**

CCC Response to Q7.15

89. It is the Council's position that the proposed additional text in paragraph 8.190 of the Local Plan **(SD001, page 284)** relating to redevelopment of school sites is needed to make the policy effective.

90. Essex County Council's (ECC) 10 Year Plan for School Places informs the identification of the need for school places and identifies surpluses or deficits. ECC updates the 10 Year Plan for School Places annually.

91. The reference in the second sentence of Paragraph 8.190 to the current 10 Year Plan for School Places covering the period 2020-2029 is unnecessary and lacks clarity. The latest 10 Year Plan for School Places will be the relevant reference document to inform the determination of planning applications for the change of use or redevelopment of educational establishments, as well as the extension or expansion of existing educational facilities – **MOD Ref 290 (SD005)**.

92. The Council is proposing a change to **MOD Ref 290** to clarify that the 10 Year Plan for School Places does not identify the need for early years places and instead to include reference to the Childcare Sufficiency Assessment which is undertaken annually setting out how the duty to provide enough childcare is being implemented.

93. The Council considers that for clarity it should be highlighted in Paragraph 8.190 that there are circumstances in which it may be acceptable to redevelop school sites, i.e. in the event that provision could be enhanced or the area better served by consolidating assets and reinvesting capital receipts – **MOD Ref 290 (SD005)**.

94. The Council considers that Policy DM22 is sound, subject to an amendment to **MOD Ref 290 (SD005)** which is required to paragraph 8.190 to ensure the policy is effective.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
AMEND Ref 290	284	-	Policy DM22 Paragraph 8.190	*Amend paragraph:* Essex County Council (ECC) as Education Authority has the responsibility for early years and school place planning. Through this process ECC identifies the need for ~~early years and~~ school places and identifies surpluses or deficits through a 10 Year Plan for School Places <u>on an annual basis</u> ~~currently covering the period 2020-2029~~. <u>A Childcare Sufficiency Assessment is undertaken annually setting out how the duty to provide enough childcare is being implemented.</u> Whether the change of use or redevelopment of independent schools would be considered surplus to educational requirements will be considered on a case by case basis. <u>The redevelopment of school sites should not be precluded in the event that provision could be enhanced</u> <u>or the area better served by consolidating assets and reinvesting capital receipts</u>.	For clarity.

Q7.16	**Are any other modifications to Strategic Policy S5 or Policies DM20-22 needed for soundness?**

CCC Response to Q7.16

95. It is the Council's position that other than the modifications identified in response to Questions 7.9 - 7.11 and 7.14 - 7.15 above, no other modifications to Strategic Policy S5 or Policies DM20-22 are needed for soundness. The Council considers that subject to these modifications, that the Policy S5 and Policy DM20-22 are sound.

EVIDENCE BASE LIST FOR MATTER 7	
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)
OSP0015	Adopted Chelmsford Local Plan May 2020
ECON001	Retail Capacity Study Update 2023
ECON001-A	Chelmsford – Town Centre Composition Update October 2026
ECON002	Employment Land Review 2023
PL002	Parish Audit March 2024
PL022	Chelmsford Cultural Strategy 2023
PL021	Chelmsford Plan for Improving Rivers and Waterways in around Chelmsford
PL033-A	Revised Masterplan and Planning Brief Procedure (October 2026
TP012	Submission Topic Paper Transport May 2026
INF012	Chelmsford City Council Infrastructure Delivery Plan – Stage 3 Infrastructure Delivery Plan to Support the Submission Local Plan
T012	Local Cycling and Walking Infrastructure Plan September 2024



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

Please call 01245 606330
Spatial Planning Services
Directorate for Sustainable Communities
Chelmsford City Council
Civic Centre
Duke Street
Chelmsford
Essex
CM1 1JE

Telephone 01245 606330
planning.policy@chelmsford.gov.uk
www.chelmsford.gov.uk

Document published by
Spatial Planning Services
© Copyright Chelmsford City Council

Chelmsford City Council