Chelmsford Policy Board Agenda

26 June 2025 at 7pm

Council Chamber, Civic Centre, Chelmsford

Membership

Councillor C Adutwim (Chair)

and Councillors

H. Ayres, P. Clark, P. Davey, I. Fuller, J. Jeapes, S. Manley, B. Massey, M. O'Brien, A. Sosin, A. Thorpe-Apps, R. Whitehead, and S. Young

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CHELMSFORD POLICY BOARD

26 June 2025

AGENDA

PART 1

Items to be considered when members of the public are likely to be present

1. Apologies for Absence

2. Declarations of Interest

   All Members are reminded that they must disclose any interests they know they have in items of business on the meeting's agenda and that they must do so at this point on the agenda or as soon as they become aware of the interest. If the interest is a Disclosable Pecuniary Interest they are also obliged to notify the Monitoring Officer within 28 days of the meeting.

3. Minutes

   Minutes of meeting on 13 March 2025

4. Public Questions

   Any member of the public may ask a question or make a statement at this point in the meeting. Each person has two minutes and a maximum of 20 minutes is allotted to public questions/statements, which must be about matters for which the Board is responsible. The Chair may disallow a question if it is offensive, substantially the same as another question or requires disclosure of exempt or confidential information. If the question cannot be answered at the meeting a written response will be provided after the meeting.

   Any member of the public who wishes to submit a question or statement to this meeting should email it to committees@chelmsford.gov.uk 24 hours before the start time of the meeting. All valid questions and statements will be published with the agenda on the website at least six hours before the start time and will be responded to at the meeting. Those who have submitted a valid question or statement will be entitled to put it in person at the meeting.

5. Review of Local Plan – Consideration of Pre-Submission Local Plan (Regulation 19) and Integrated Impact Assessment (IIA) consultation feedback

6. Homelessness and Rough Sleepers Strategy (recommendation to Cabinet)

7. Work Programme

8. Urgent Business

To consider any other matter which, in the opinion of the Chair, should be considered by reason of special circumstances (to be specified) as a matter of urgency.

MINUTES

of the

CHELMSFORD POLICY BOARD

held on 13 March 2025 at 7pm

Present:

Councillor C. Adutwim (Chair)

Councillors P. Clark, K. Franks, J. Hawkins, J. Jeapes, R. Lee, G. Pooley, A. Sosin and S. Young

1. Apologies for Absence

Apologies for absence were received from Cllrs Deakin, Fuller, Massey, Walsh and Whitehead. Cllrs Franks, Hawkins and Lee substituted for Cllrs Deakin, Fuller and Walsh.

2. Declarations of Interest

Members were reminded that they must disclose any interests they knew they had in items of business on the meeting's agenda and that they must do so at this point on the agenda or as soon as they became aware of the interest. If the interest was a Disclosable Pecuniary Interest they were also obliged to notify the Monitoring Officer within 28 days of the meeting. Any declarations are recorded in the relevant minute below.

3. Minutes

The minutes of the meeting on 16th January 2025 were confirmed as a correct record.

4. Public Questions

No public questions had been submitted for the meeting.

5. Updated Essex Parking Standards Guidance

The Board were asked to consider the updated Essex Parking Guidance and Standards commissioned by the Essex Planning Officers' Association (EPOA) and to refer them to Cabinet for approval. The Board were informed that the current standards had been produced in 2009 and were therefore in need of an update. It was noted that officers from all Council's in Essex had been involved in the production of the updated document, alongside public and stakeholder consultation in 2024 by Essex County Council. The Board noted that the guidance related to parking provision and design for new developments and the consideration of planning applications. The Board heard that Part 1 of the updated guidance and standards related to general design and the number of parking spaces for new development, whilst Part 2 supplemented this with further guidance for garden communities and large scale developments.

The Board were informed by officers that the previous standards had been based on maximum standards, but the updated document focused on minimum standards, allowing for higher levels of parking provision where required. The Board also heard that the Council would use the updated document as a starting point when considering planning applications, but that the Planning Committee would still have flexibility where required. It was noted that the document did not relate to public car parks and that it looked at connectivity levels of different areas, when determining the amount of parking provision required. The Board were also informed that the zonal approach to locations, could change as and when public transport services were added to new phases of developments. The Board noted that update guidance provided a more common sense approach to parking standards, encouraging provision to be lower where suitable public transport was in place. The Board also noted that the standards and guidance provided a consistent baseline for decision makers, whilst still enabling a departure when warranted by specific local circumstances.

In response to questions from the Board, officers stated that;

- The zonal connectivity elements would be looked at periodically to ensure they were in line with current public transport provision and the Planning committee could always use flexibility and local knowledge where appropriate.
- The levels of provision would be based upon certain triggers being met at new developments.
- Significant new developments would only be in sustainable locations or locations made by sustainable by new public transport provision, so concerns around developments being overly reliant on car journeys should not materialise, but in any event the updated guidance showed a minimum of 3 spaces in some more rural areas compared to the current 2.
- The Council's Car Parking strategy looked at provision in public car parks and sought the correct mix of parking in areas such as the City Centre, rather than the updated standards and guidance.
- The guidance did not overlap directly with policies such as those on conservation areas or heritage, but the Council's heritage officer would always be able to provide relevant responses where required to planning applications.
- E-scooters were only permitted under the current pilot scheme, but part 2 of the updated guidance did refer to mobility hubs with parking provided for E-scooters in more communal locations.

RESOLVED that the Board recommended that Cabinet approve the use of the updated Essex Parking Guidance and Standards Parts 1 and 2 in the consideration of development proposals and planning applications in accordance with Policy DM27 of the adopted Chelmsford Local Plan (2020) and its emerging review.

(7.03pm to 7.36pm)

6. North Hill, Little Baddow Conservation Area

The Board were asked to consider the North Hill, Little Baddow Conservation Area Appraisal and Management Plan and whether it should be published for consultation. The Board were informed that following a request from Little Baddow Parish Council the Character Appraisal and Management Plan for the area had been produced and that following a public consultation, a future report would be prepared for Cabinet to ratify the designation of the Conservation Area.

The Board were informed that a study of the area had identified sufficient special interest to justify the designation, hence the Board's approval was being sought to progress with public consultation. The Board heard that an area needed to be of 'special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance' and that officers felt the area met that requirement. It was noted that there were currently 25 Conservation areas within Chelmsford and that North Hill had many key characteristics including a high standard of maintenance, views across the valley and modest buildings within a landscape setting. The Board heard that the character appraisal and boundary would be amended if required following the public consultation, before approval by Cabinet and then finally Statutory notifications.

In response to questions from the Board, officers stated that;

- Conservation Areas were intended to assist with managing change in areas where historic character should be protected, not to restrict development and that the designation was different to the green belt, where permitted development rights remained and in effect it placed greater scrutiny over any change, to ensure it was sympathetic to the special characteristics of the area. It was also noted that some Conservation Areas existed within the green belt and that they were a qualitative designation with a fairly high bar that had to be reached to achieve designation.
- The area in question had a significant number of historic heritage assets in close vicinity to each other and warranted an extra layer of protection, but that did not mean no development would be able to take place, just that there would be a tighter control to reflect the very special character of the location.
- Conservation Areas were reviewed by officers on an ad hoc basis and may be looked at due to requests by a Parish Tier Council as in this instance or as a result of nearby development pressure.
- They would explore whether a more formal review policy position was required going forward for existing or new Conservation Areas.

RESOLVED that;

1. The Board approved the publication of the North Hill, Little Baddow Conservation Area Appraisal and Management Plan for consultation.
2. The Board delegated responsibility to the Director of Sustainable Communities in consultation with the Cabinet Member for a Greener Chelmsford to make any minor changes required to the document prior to publication for consultation.

(7.39pm to 7.52pm)

7. Feedback from the Waterways Working Group

The Board were provided with an update from the Chair of the Waterways Working Group, that detailed feedback from the meeting held on 29th January 2025. The Board heard that Chelmsford had two fantastic rivers, but that flood defences were crucial in protecting the City alongside planning guidelines, from increased flooding as a result of climate change. It was noted that the Environment Agency had been looking into possible solutions to defend the City Centre from flooding and it was felt that a larger amount of smaller schemes would be the preferred approach, rather than one large scheme. The Board heard that the EA had undertaken a very comprehensive survey of the flood risks in Chelmsford and modelling based upon that would be finalised soon. Then suggestions could be looked at along with costs and a business case for suitable options going forward.

In response to questions from the Board, it was noted that;

- The flood resilience scheme aimed to tackle properties that were at risk of flooding with a main focus on the City Centre and that the risks from the River Crouch were different.
- A different solution would be required for areas outside of the City Centre, which would be driven by the number of properties at risk.
- The EA had carried out the most extensive survey for the City Centre to date and had looked at the increased chances of flooding in certain areas. The updated modelling accounted for new nationally set criteria to look at climate change and the scheme would look at a worst case scenario and a balance for how acceptable and appropriate a prevention scheme might be.
- Officers had encouraged the EA to continue dialogue with owners of certain properties to provide reassurance and noted that nothing would be proposed for the City Centre, that would have an adverse impact elsewhere.

RESOLVED that the updated be noted.

(7.53pm to 8.06pm)

8. Work Programme

The Board considered an item detailing their future work programme.

RESOLVED that the Work programme be approved.

(8.06pm to 8.07pm)

9. Urgent Business

There were no items of urgent business.

The meeting closed at 8.07pm Chair

Chelmsford Policy Board

26 June 2025

Chelmsford Local Plan – Pre-Submission (Regulation 19) Consultation Feedback

Report by:

Director of Sustainable Communities

Officer Contacts:

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Claire Stuckey, Principal Planning Officer – claire.stuckey@chelmsford.gov.uk 01245 606475

Purpose

The purpose of this report is to provide feedback on the main issues raised in the consultation responses to the Local Plan Pre-Submission (Regulation 19) Document and the Pre-Submission Integrated Impact Assessment. The report also provides information on the submission of the plan for Independent Examination.

Recommendations

1. That the Board notes the outcomes of the consultation contained within the covering report and attached at Appendices 1 and 2.

2. To give delegated authority to the Director of Sustainable Communities in consultation with the Cabinet Member for a Greener Chelmsford to make any necessary minor amendments to the Chelmsford Local Plan Pre-Submission (Regulation 19) Feedback Report and Pre-Submission Integrated Impact Assessment Feedback Report before publication as part of the Local Plan evidence base.

1. Introduction

1.1. The Pre-Submission (Regulation 19) consultation represented the third formal stage in the preparation of the review of the adopted Local Plan. It was the final technical public consultation on the draft Local Plan before it is submitted for Independent Examination. At this stage representations were invited on whether the plan complies with all relevant legislation, the Duty to Co-operate, and meets the tests of soundness set out in national planning policy. The 'duly made'[1] responses received will be submitted with the Local Plan and plan evidence base to the Planning Inspector, who following the Independent Examination, will make recommendations to the Council on whether the plan is 'sound' and therefore be adopted.

1.2. This report provides a summary of the consultation, and the main issues raised in the responses with full details contained within the consultation Feedback Reports given at Appendices 1 and 2. It also provides information on the submission of the plan for Independent Examination.

2. About the Pre-Submission and Integrated Impact Assessment Consultation

2.1 The Pre-Submission Local Plan was formulated considering the amount of new development required, the evidence base, national planning policy and guidance, and the feedback from two previous rounds of formal public consultation in 2022 and 2024. The detail of the Pre-Submission Local Plan and its accompanying Integrated Impact Assessment (IIA) was reported to the meeting of Chelmsford Policy Board on 16 January 2025 available on the Council's website at Chelmsford Policy Board (January 2025).

2.2 In line with national planning legislation, the Pre-Submission Local Plan consultation followed a more formal approach where respondents were required to frame their representation as to whether the plan is:

- Prepared in accordance with the Duty to Co-operate
- Legally and procedurally compliant, and
- Sound – positively prepared, justified, effective, consistent with national policy.

2.3 As the Pre-Submission Local Plan is the final stage of Local Plan preparation, the duly made representations received will be passed to the Inspector appointed by the Secretary of State to examine the Local Plan and for them to consider as part of the Independent Examination.

2.4 A comprehensive six-week programme of consultation took place during the consultation period which ran from 4 February to 18 March 2025. This followed (and exceeded) the requirements set out in legislation[2], and the commitments in the Council's Adopted Statement of Community Involvement (September 2020)[3].

2.5 The consultation was promoted through a range of activities including email/letter notifications to more than 6,300 contacts registered on the Council's Consultation Portal, on the Council's website, press releases, adverts in local publications and social media.

[1] Pursuant to Regulation 20 of The Town and Country Planning (Local Planning) (England) Regulations 2012 https://www.legislation.gov.uk/uksi/2012/767/contents
[2] Town and Country Planning (Local Planning) (England) Regulations 2012 https://www.legislation.gov.uk/uksi/2012/767/contents
[3] Statement of Community Involvement https://www.chelmsford.gov.uk/media/byjfrq2v/statement-of-community-involvement-adopted-september-2020.pdf

Consultation activities included placing consultation documents on deposit at the Council's Customer Service Centre, organising stakeholder presentations, Duty to Co-operate meetings, staffed face to face exhibitions, and an animated Local Plan video. The Council also published several documents to support the consultation including non-technical summary leaflets, Frequently Asked Questions (FAQs) and Topic Papers. More information on the consultation undertaken is provided in Section 1 of the Pre-Submission (Regulation 19) Feedback Report at Appendix 1.

3. Summary of the responses to the Pre-Submission Local Plan

3.1. A total of 6,725 duly made responses were received to the Pre-Submission (Regulation 19) Local Plan from 2,798 respondents. 29 of the comments received were assessed to be partly 'inadmissible' due to their content and have had the inadmissible text redacted before being published. However, for completeness, the full 'unredacted' comments have been provided to members of the Chelmsford Policy Board.

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

3.3. As part of the consultation a further opportunity was given to submit sites to the Strategic Housing and Employment Land Availability Assessment (SHELAA). An additional four sites and amendments to four existing sites were submitted. These are being assessed in an updated SHELAA due for consideration by this Board in September.

3.4. Section 2 of the Pre-Submission (Regulation 19) Feedback Report in Appendix 1 provides a summary of representations received. Section 3 outlines the key main issues raised and changes requested in order of the Pre-Submission (Regulation 19) Local Plan. Comments from public sector bodies, infrastructure or service providers and developers/ landowners are specified in brackets at the end of relevant bullet points with their comment IDs. This is because it is useful to understand the nature of respondents, particularly where a stakeholder has a legal duty or responsibility over a matter that they are making comments about. We have not specified who has made comments from members of the public as to do so would result in a very long report, so bullet points from the public do not have brackets.

3.5. It should be noted that in some cases, members of the public raised similar points to stakeholders. This is especially the case in relation to comments made by Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group to Strategic Growth Sites 16a (Hammonds Farm) and 16b (Junction 18 of the A12) which have been replicated and amplified by many individuals. To avoid duplication, these comments have not been repeated in public comments. However, this does not affect the Council's or future Planning Inspector's consideration of the consultation responses, as required by the relevant Regulations, the report focuses on the main issues received rather than the number of representations to any individual section of the plan.

3.6. It is stressed that the feedback report does not seek to report on every individual point raised nor does it analyse or provide a Council response to the comments received but it does summarise the main themes within the consultation responses. Officers will be assessing all the information received and will provide a high-level response to the main issues raised in the Regulation 22 Consultation Statement discussed in paragraph 5.3 to accompany the submission of the Local Plan.

3.7. An overview of the key main issues raised in responses to the Pre-Submission (Regulation 19) is provided below:

- A wide range of feedback was received ranging from general comments to technical observations on detailed policy wording
- Most Government agencies or national bodies support the plan outright or offer qualified support subject to some proposed amendments
- Mix of support and opposition from Town/Parish Councils, with many suggesting changes including the deletion of site allocations
- Most public comments were objecting to one or more aspects of the plan, though there was limited support
- Some developers, Parish Councils and the public challenge compliance with the Duty to Cooperate including whether all bodies have been properly engaged and neighbouring unmet housing needs properly considered
- Concerns over the evidence base/ lack of justification for some policies including net zero homes (Policy S2 and DM31), development requirements (Policy S6) and sustainable development measures in DM25
- Mix of support and opposition to the development requirements (Policy S6) and the Spatial Strategy (Policy S7)
- Concerns that the Spatial Strategy (Policy S7) is too reliant on larger strategic sites particularly the Garden Communities, has an insufficient supply buffer, is too reliant on windfall sites, and that a sufficient range of reasonable alternatives approaches, and site options have not been considered or appraised
- Concerns there are not enough small site housing allocations which does not accord with national policy requirements
- Calls for the expansion of the North-East Chelmsford Garden Community site and clarity sought over why this option is rejected
- Calls from developers for Green Belt and Green Wedge reviews to identify sustainable development opportunities in these areas
- Many detailed wording changes proposed to expand/amend policies from minor changes to the deletion of policy requirements including to some site allocation policies to ensure they are viable and deliverable
- Many objections from the development industry to policy requirements which exceed national planning policy including net zero homes (Policy S2 and DM31) and 20% biodiversity net gain (Policy S4 and DM16)
- Some question the need for policies including a strategic design policy (Policy S15 Successful Places) and specific Green Wedge policies (Policy S11 Countryside)
- Many in the development industry call for an immediate/earlier review of the plan to meet housing needs in full as soon as possible (Policy S13 Monitoring and Review)
- Many in the development industry call for the housing requirement to be increased to meet or exceed the revised Standard Method figure of 1,454 dwelling per annum outlined in the 2024 National Planning Policy Framework (NPPF)
- Broad support from the promoters of allocated sites with some requests for higher capacities, larger site areas, more flexible types of employment floorspace and policy requirement changes
- Many alternative site allocations promoted by landowners/developers at a range of site sizes and locations
- Significant levels of opposition to Hammonds Farm (SGS16a) and Junction 18 A12 Employment Area (SGS16b) for multiple reasons including traffic, landscape, flood risk, infrastructure and heritage impacts, with calls for their removal. There is also some limited support for these sites
- High level of objections to some other site allocations in particular Land at Kingsgate, Bicknacre (GS11b) and Land West of Barbrook Way, Bicknacre (GS11c) for multiple

reasons including traffic, infrastructure, landscape and flood risk impacts and calls for their removal
- Many developers challenge the delivery rates of strategic site allocations in particular SGS16a, and whether a 5-year housing land supply can be achieved and maintained
- Concerns from Parish Councils and the public that some site allocations do not reflect 'made' Neighbourhood Plans
- Calls for changes to masterplan requirements for strategic sites and Special Policy Areas
- Requests for policy and Policy Map changes to some Special Policy Areas including ARU Writtle and Hanningfield Reservoir, and additional Special Policy Areas proposed
- Development industry concerns on how the plan will be used alongside the 2024 National Planning Policy Framework (NPPF) for decision-making
- Criticism from some Parish Councils and the public regarding the consultation including a lack of adequate engagement, inaccessible information and that the process for making comments was too complicated.

4. Summary of responses to the Integrated Impact Assessment

4.1. An Integrated Impact Assessment (IIA) has been developed alongside the Local Plan review document. The IIA covers the traditional supporting Sustainability Appraisal, Strategic Environmental Assessment and Habitats Regulations Assessment, with the addition of a Health Impact Assessment and Equalities Impact Assessment.

4.2. A total of 54 duly made responses were received to the Pre-Submission (Regulation 19) Integrated Impact Assessment (IIA) consultation from 39 respondents. These have been analysed separately to the Pre-Submission (Regulation 19) Local Plan representations by independent consultants, and the IIA Feedback Report is attached at Appendix 2.

4.3. There was general support for the IIA and its analysis across the responses. Comments from the three statutory bodies are summarised below:

Natural England
- Sustainability Appraisal and Strategic Environmental Assessment - Support the key sustainability issues including those relating to biodiversity and green infrastructure, land use, landscape/townscape, and the criteria to test the plan's policies and proposals for negative impacts on European sites, SSSIs local sites and ancient woodland
- Habitat Regulations Assessment - Subject to the provision of sufficient high quality accessible natural greenspace to mitigate alone impacts of larger developments, agree with the conclusion that the Pre-Submission Local Plan will have no adverse effects on the integrity of the Essex Coast Habitats Sites due to recreational pressure or urbanisation effects, alone or in combination
- Consider that more weight should be given to bespoke scheme-level measures (e.g. the provision of circular walks) to mitigate recreational impacts that may be required for some developments, in addition to payments under the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS)[4].

Environment Agency
- Particular support expressed for content relating to wastewater recycling.

[4] Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) and Supplementary Planning Document available at https://www.chelmsford.gov.uk/planning-and-building-control/essex-coast-rams/

Historic England

- No specific comments received to the IIA.

4.4. Other specific main issues are summarised below:

- Support for the IIA and its analysis
- Lack of justification and evidence for the proposed allocations
- Questions on the detailed scoring for specific IIA indicators
- Other alternative options should be considered to be more suitable, including higher growth options and alternative sites promoted by landowners
- Objection to a lack of a Green Belt review and disagreement with the protection of the Green Wedge
- The settlement hierarchy approach to the allocation of growth is overly restrictive.

4.5. The Feedback Report includes a summary of the consultee responses, and a response/action describing how the comments will be considered. This includes updating text or reasons for where no change is proposed, and the next steps for the IIA's role in accompanying the Submission and Examination of the review of the Local Plan. This will include consideration of an addendum if required.

5. Local Plan Submission (next steps)

5.1. The next stage in the preparation of the review of the Local Plan is submission to the Secretary of State who will appoint an Inspector to carry out an Independent Examination. Submission is expected to take place in December 2025 following agreements from this Board, Cabinet and Full Council in November and December.

5.2. Submission was originally programmed for June 2025 to meet a government deadline for plans going through the transitional arrangements. However, the government has pushed back their deadline by 18 months. Submission of the plan in December 2025 will also give more time to fully analyse the high number of comments received and to ensure all necessary documentation is in place. The adjusted submission timetable will be formalised in an updated Local Development Scheme to be presented to this Board in September 2025.

5.3. A number of documents will be submitted alongside the Pre-Submission (Regulation 19) Local Plan and IIA. These will be prepared over Summer/Autumn 2025 and include:

- Updated Legal Compliance Checklist
- Updated Soundness Self-Assessment Checklist
- Duty to Cooperate Compliance Statement
- Schedules of Pre-Submission Local Plan and IIA representations
- Regulation 22 Statement of Consultation
- Updated Local Plan Topic Papers
- New/updated Statements of Common Ground, and
- Schedule of Additional Local Plan Modifications.

5.4. There is no requirement in regulations for the Council to provide a response to individual representations on the Pre-Submission (Regulation 19) Local Plan. However, we will assess all the information received and provide focused responses to the main issues raised in the Regulation 22 Statement of Consultation. This will set out how the council has consulted and engaged with communities and stakeholders throughout the

preparation of the plan and will help the Inspector and respondents understand the council's position ahead of the Independent Examination.

5.5. It is anticipated that a Schedule of Additional Local Plan Modifications will be prepared setting out non-material changes that the Council would like to make to the Pre-Submission (Regulation 19) Local Plan. These are intended to address any clarity and consistency matters, issues agreed through new/updated Statements of Common Grounds and to reflect any updated information including the latest April 2025 Housing Site Schedule.

5.6. Ahead of proposed submission in December 2025, the council will appoint a Programme Officer to provide administrative support to the Inspector and to help ensure the efficient running of the Independent Examination. The council will also agree a Service Level Agreement (SLA) with the Planning Inspectorate. It is anticipated that the examination hearings sessions could start in early 2026 subject to confirmation from the Planning Inspectorate, and that plan adoption could be around mid-2026.

6. Conclusion

6.1. The Pre-Submission (Regulation 19) Local Plan consultation was the third and final technical public consultation on the review of the adopted Chelmsford Local Plan. It was supported by a strong consultation strategy and attracted a high level of response from a wide variety of individuals and organisations.

6.2. Officers are working towards submission of the Pre-Submission (Regulation 19) Local Plan in December 2025 and will coordinate with Committee Services to ensure that committee meetings are in place to achieve this. As part of the submission requirements, all the duly made Regulation 19 consultation comments will be sent to the Secretary of State who will appoint an Inspector to carry out the Independent Examination.

6.3. Overall, work is continuing at pace on the Review of the Local Plan. This is important to give the council more control over where and how new development comes forward in the future.

List of Appendices:

Appendix 1 – Chelmsford Local Plan Pre-Submission (Regulation 19) Feedback Report
Appendix 2 – Pre-Submission Integrated Impact Assessment Feedback Report

Background Papers:

Local Plan Pre-Submission (Regulation 19) Consultation Document
Local Plan Pre-Submission Integrated Impact Assessment (IIA)
Chelmsford Policy Board on 14 July 2022, agenda Item 6 Review of Adopted Local Plan – Issues and Options Consultation
Chelmsford Policy Board on 28 February 2023, agenda Item 5 Review of Adopted Local Plan – Issues and Options Consultation Feedback
Chelmsford Policy Board on 14 March 2023, agenda Item 5 Preferred Options Consultation Documents
Chelmsford Policy Board on 26 September 2024, agenda item 5 Preferred Options Consultation Feedback
Chelmsford Policy Board on 16 January 2025, agenda item 5 Regulation 19 Pre-Submission Consultation Documents
Chelmsford City Council Adopted Local Plan

National Planning Policy Framework, December 2023
National Planning Policy Framework, December 2024
Planning practice guidance
Statement of Community Involvement, September 2020
Local Development Scheme 2023-2028, November 2023
The Town and Country Planning (Local Planning) (England) Regulations 2012
Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) and Supplementary Planning Document available at https://www.chelmsford.gov.uk/planning-and-building-control/essex-coast-rams/

Corporate Implications

Legal/Constitutional:
There is a need to ensure the review of the Local Plan accords with the latest legislative requirements.

Financial:
There are no cost implications arising directly from this report. The Local Plan is being prepared using the existing agreed budget.

Potential Impact on Climate Change and the Environment:
The review of the adopted Local Plan will seek to ensure new development within the administration area will contribute towards meeting the Council's Climate Change agenda.

Contribution toward Achieving a Net Zero Carbon Position by 2030:
The review of the adopted Local Plan will seek to ensure new development within the administration area will contribute towards achieving a net zero carbon position by 2030.

Personnel:
There are no personnel issues arising directly from this report.

Risk Management:
There are several risk considerations associated with local plan production. These are set out in Local Development Scheme (LDS) 2023 with contingency measures and will be updated as part of the review of the LDS.

Equality and Diversity:
The Public Sector Equality Duty applies to the council when it makes decisions. An Equalities and Diversity Impact Assessment forms part of the Integrated Impact Assessment for the review of the Local Plan and concludes that it will not have a disproportionate adverse impact on any people with a particular characteristic and in general will have positive or neutral impacts across a wide range of people and will be compatible with the duties of the Equality Act 2010.

Health and Safety:
There are no Health & Safety issues arising directly from this report.

Digital:
There are no digital issues arising directly from this report.

Other:
The review of the Local Plan will seek to contribute to priorities in the Council's Our Chelmsford, Our Plan (2024): A Fairer and More Inclusive Place, A Greener and Safer Place, and A More Connected Place.

Consultees:

CCC – Legal Services
CCC – Communications

Relevant Policies and Strategies:

The report takes account of the following policies and strategies of the City Council:

Adopted Local Plan 2013-2036 and supporting Supplementary Planning Documents and Planning Advice Notes
Our Chelmsford, Our Plan (2024)
Statement of Community Involvement (2020)
Health and Wellbeing Plan (2019)
Public Open Spaces Policy (2022)
Climate and Ecological Emergency Action Plan (2020)
Housing Strategy 2022-27 (2022)
Homelessness and Rough Sleeping Strategy 2020-24 (2020)
Cultural Strategy (2023)
Plan for Improving Rivers and Waterways (2022)
Chelmsford Green Infrastructure Strategic Plan 2018-2036
Essex Coast Recreational disturbance Avoidance and Mitigation Strategy 2018-2038
Climate and Ecological Emergency Action Plan (2020)
Duty to Co-operate Strategy (2022)

Our Chelmsford, Our Plan

The above report relates to the following priorities in the Corporate Plan:

Promoting sustainable and environmentally responsible growth to stimulate a vibrant, balanced economy, a fairer society and provide more homes of all types.

Creating a distinctive sense of place, making the area more attractive, promoting its green credentials, ensuring that people and communities are safe.

Bringing people together and working in partnership to encourage healthy, active lives, building stronger, more resilient communities so that people feel proud to live, work and study in the area.

Chelmsford Local Plan

Pre-Submission (Regulation 19) Document

Feedback Report

June 2025

For Chelmsford Policy Board
26 June 2025

NOT FINAL PUBLICATION VERSION

Our Planning Strategy 2022 to 2041

Chelmsford Local Plan

Pre-Submission Consultation Document Feedback Report

Abbreviations	**1**
Executive Summary	**4**
Introduction	**7**
Section 1: Summary of Consultation Undertaken	**8**
Section 2: Summary of Representations	**10**
Section 3: Main Issues Raised in Consultation Responses	**14**
Appendix 1	**139**

Abbreviations

ARU	Anglia Ruskin University
BAE	British defence, security and aerospace company
BNG	Biodiversity Net Gain
BREEAM	Building Research Establishment Environment Assessment Method
CCC	Chelmsford City Council
CGC	Chelmsford Garden Community
CFS	Call For Site
CIL	Community Infrastructure Levy
CNEB	Chelmsford North East Bypass
DFD	Development Framework Document
dpa	Dwellings per annum
DSB	Defined Settlement Boundary
ECC	Essex County Council
EA	Environment Agency
EPOA	Essex Planning Officers Association
EV	Electric Vehicle
FRA	Flood Risk Assessment
GI	Green Infrastructure
GS	Growth Site
GTAA	Gypsy and Traveller Accommodation Assessment
HGV	Heavy Goods Vehicle
HIA	Heritage Impact Assessment
IDP	Infrastructure Delivery Plan
IIA	Integrated Impact Assessment
LCWIP	Local Cycling and Walking Infrastructure Plan
LNRS	Local Nature Recovery Strategy
LPA	Local Planning Authority
MMO	Marine Management Organisation
MRA	Minerals Resource Assessment
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
RAMS	Recreational Avoidance Mitigation Strategy
SANG	Suitable Alternative Natural Greenspace
SEND	Special Educational Need and Disabilities
SFRA	Strategic Flood Risk Assessment
SGS	Strategic Growth Site
SHELAA	Strategy Housing and Employment Land Availability Assessment
SHNA	Strategic Housing Needs Assessment
SPA	Special Policy Area
SRN	Strategic Road Network
SuDS	Sustainable Drainage Systems
SWF	South Woodham Ferrers
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest

VDS	Village Design Statement
WCS	Water Cycle Study
WRC	Water Recycling Centre

Executive Summary

This report sets out a summary of the consultation and the main issues raised in the responses received on the Pre-Submission Local Plan. The Pre-Submission Local Plan was the third formal stage in the preparation of the review of the adopted Chelmsford Local Plan. It identifies land for the provision of new housing, jobs and schools as well as areas for protection, and policies to help determine planning applications.

About the Consultation

A comprehensive six-week programme of consultation took place during the formal consultation period from 10am on 4th February 2025 to 4pm on 18th March 2025. The consultation was promoted through a range of activities including email/letter notifications to more than 6,200 contacts registered on the Council's Consultation Portal, on the Council's website, adverts in local publications, site notices and social media. Consultation activities included placing consultation documents on deposit at the Council's Customer Service Centre, organised stakeholder presentations, Duty to Co-operate meetings and public exhibitions.

Summary of responses to the Pre-Submission Consultation Document

A total of 6,725 duly made comments were received to the consultation from 2,798 respondents. The respondents are from a wide variety of groups and individuals including residents, developers, landowners and their agents, businesses and statutory bodies such as other local authorities and Parish/Town Councils. All the comments received can be viewed on the Council's Consultation Portal. An overview of the main issues raised to the plan is provided below:

- A wide range of feedback was received ranging from general comments to technical observations on detailed policy wording
- Most Government agencies or national bodies support the plan outright or offer qualified support subject to some proposed amendments
- Mix of support and opposition from Town/Parish Councils, with many suggesting changes including the deletion of site allocations
- Most public comments were objecting to one or more aspects of the plan, though there was limited support
- Some developers, Parish Councils and the public challenge compliance with the Duty to Cooperate including whether all bodies have been properly engaged and neighbouring unmet housing needs properly considered
- Concerns over the evidence base/ lack of justification for some policies including net zero homes (Policy S2 and DM31), development requirements (Policy S6) and sustainable development measures in DM25
- Mix of support and opposition to the development requirements (Policy S6) and the Spatial Strategy (Policy S7)
- Concerns that the Spatial Strategy is too reliant on larger strategic sites particularly the Garden Communities, has an insufficient supply buffer, is too reliant on windfall sites, and that a sufficient range of reasonable alternatives approaches, and site options have not considered or appraised

- Concerns there are not enough small site housing allocations which does not accord with national policy requirements
- Calls for the expansion of the North-East Chelmsford Garden Community site and clarity sought over why this option is rejected
- Calls from developers for Green Belt and Green Wedge reviews to identify sustainable development opportunities in these areas
- Many detailed wording changes proposed to expand/amend policies from minor changes to the deletion of policy requirements including to some site allocation policies to ensure they are viable and deliverable
- Many objections from the development industry to policy requirements which exceed national planning policy including net zero homes (Policy S2/ DM31) and 20% biodiversity net gain (Policy S4/ DM16)
- Some question the need for policies including a strategic design policy (Policy S15 Successful Places) and specific Green Wedge policies (Policy S11 Countryside)
- Many in the development industry call for an immediate/earlier review of the plan to meet housing needs in full as soon as possible (Policy S13 Monitoring and Review)
- Many in the development industry call for the housing requirement to be increased to meet or exceed the revised Standard Method figure of 1,454 dpa outlined in the 2024 NPPF
- Broad support from the promoters of allocated sites with some requests for higher capacities, larger site areas, more flexible types of employment floorspace and policy requirement changes
- Many alternative site allocations promoted by landowners/developers at a range of site sizes and locations
- Significant levels of opposition to Hammonds Farm (SGS16a) and Junction 18 A12 Employment Area (SGS16b) for multiple reasons including traffic, landscape, flood risk, infrastructure and heritage impacts, with calls for their removal. There is also some limited support for these sites
- High level of objections to some other site allocations in particular Land at Kingsgate, Bicknacre (GS11b) and Land West of Barbrook Way, Bicknacre (GS11c) for multiple reasons including traffic, infrastructure, landscape and flood risk impacts and calls for their removal
- Many developers challenge the delivery rates of strategic site allocations in particular SGS16a, and whether a 5-year housing land supply can be achieved and maintained
- Concerns from Parish Councils and the public that some site allocations do not reflect ‘made’ Neighbourhood Plans
- Calls for changes to masterplan requirements for strategic sites and Special Policy Areas
- Requests for policy and Policy Map changes to some Special Policy Areas including ARU Writtle and Hanningfield Reservoir, and additional Special Policy Areas proposed
- Development industry concerns on how the plan will be used alongside the 2024 National Planning Policy Framework (NPPF) for decision-making
- Criticism from some Parish Councils and the public regarding the consultation including a lack of adequate engagement, inaccessible information and that the process for making comments was too complicated.

Next Steps

A focused Council response to the main issues raised will be presented in the Regulation 22 Consultation Statement which will accompany the plan when submitted for Examination.

Introduction

The Pre-Submission consultation represented the third formal stage in the preparation of the review of the Adopted Chelmsford Local Plan. The consultation document sets out the spatial strategy for new homes and jobs for the future growth and development of the city up to 2041. It also contains updated and new policies which would be used to determine planning applications.

The consultation was undertaken in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and was preceded by an Issues and Options consultation in 2022 and Preferred Options consultation in 2024 both undertaken in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Purpose of this Feedback Report

This feedback report sets out the consultation feedback received on the Pre-Submission document from a wide variety of groups and individuals including:

- Residents
- Developers/landowners and their agents
- Businesses
- Statutory bodies such as local authorities, Parish/Town Councils and utilities.

This report is constructed in three parts:

- Section 1 provides a summary of the consultation undertaken
- Section 2 gives a summary of the representations received
- Section 3 provides a breakdown of the main issues raised in the consultation responses. The report is set out in Pre-Submission Local Plan order and therefore the policy numbers may not be in sequence.

Section 1: Summary of Consultation Undertaken

A comprehensive six-week programme of consultation took place during the formal consultation period from 10am on 4th February 2025 to 4pm on 18th March 2025.

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

The documents published for consultation on 4th February were:

- Pre-Submission (Regulation 19) Local Plan Consultation Document; and
- Pre-Submission Integrated Impact Assessment (subject of a separate Feedback Report).

These documents were placed on deposit at CCC Customer Service Centre, with electronic versions available to view at most Parish/Town Council offices and local libraries across Chelmsford.

The Council notified more than 6,300 contacts registered on its Consultation Portal. These included the public, statutory agencies such as Essex County Council and Town/Parish Councils, utility companies, businesses, interest groups, and voluntary and community bodies. Council Members and staff were also notified.

A number of consultation events were arranged:

- Three staffed exhibitions, visited by 41 attendees
- 16 days of unstaffed exhibitions
- Four pop-up displays for the whole consultation period
- Five targeted presentations including a Parish/Town Council Forum, Agent/Developers Forum and Local Authority Duty to Co-operate meeting
- A bespoke Local Plan video, attracting 1,100 views since its launch in 2024.

Printed/online materials and advertisements were produced as follows:

- Web page with the consultation documents and links to supporting information including the exhibition panels, attracting 6,400 visits
- Advertisement in a local newspaper (Essex Chronicle), and The City Times and South Woodham Focus (independent community magazines)
- Information packs for all of Chelmsford's 29 Parish/Town Councils
- Six articles in City Life (CCC's online news website)
- 25 social media posts/stories/feeds/adverts seen nearly 50,000 times
- 140 posters distributed to Parish/Town Councils, CCC offices and leisure facilities, post offices, doctors' surgeries, churches and local shops
- Summary newsletters available at public exhibitions and on request
- 147 site notices placed around 15 proposed new site allocations
- 8 GovDelivery mailshots to 12,000 recipients
- 30 digital screens at CCC venues
- 7 digital screens at bus stops
- Staff e-mail banner and website banner.

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

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

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

Call for Sites and Strategy Housing and Employment Land Availability Assessment (SHELAA)

In addition to the Local Plan and IIA consultations, the Council undertook a Call for Sites to identify available land for consideration for future development. Four new submissions and four amendments to existing sites were submitted through this process. These are being assessed in an updated Strategic Housing and Employment Land Availability Assessment (SHELAA).

Section 2: Summary of Representations Received

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

Methodology

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

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

The consultation questions focused on whether the Council had met the legal requirements (including the duty to co-operate) and whether the plan meets the tests of soundness set out in the National Policy Planning Framework – that it is positively prepared, justified, effective and consistent with national policy.

Whichever method respondents used; all comments have been entered into the Council’s Consultation Portal.

Where respondents did not state which paragraph/section/policy or site they were commenting on, officers have assigned responses to the most relevant part of the Local Plan.

If questions were not answered by a consultee selecting a box, the Council has not sought to tick any boxes to avoid any misrepresentation.

The questions for both online methods of response were identical and have been combined for this report.

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

The assessment of responses is high level and focuses on the main issues raised, rather than the number of representations to any individual question. Where many people have made a similar main issue, these have been summarised as one main issue.

Overview of responses

A total of **6,725 comments** were received to the consultation from **2,798 respondents**. The vast majority (5,703 comments or 85%) of these were directed to proposed Strategic Sites 16a (Hammonds Farm) and 16b (Employment site adjacent

to J18 of A12) almost all of which are residents objecting to the inclusion of the sites in the Local Plan.

Comments by respondent type:

Type of Respondent	Explanation	Number of Respondents
Duty to Co-operate (DTC) bodies	Key bodies consulted on strategic matters, including Essex County Council, adjoining local authorities, Historic England, Natural England, Environment Agency	153
Specific bodies/groups	Parish/Town Councils, utility bodies, health and transport consultees etc	270
General and Other bodies/groups	Voluntary groups, religious groups, housing providers, businesses etc	208
Developers/landowners	Landowners, promoters of land and their agents	647
Public	Individual members of the public	5,838

How people made their comments:

Method of making comments	Number of Comments	Percentage (rounded)
Online Consultation Portal	413	6%
E-mail	6,257	93%
Letter	55	1%

The number of representations made to each question are shown in the tables below. These record where people selected an option, and/or where they made a written comment. The figure in brackets represents the percentage of total representations. It should be noted that the number of responses received to each question will not amount to the totals set out above as people did not have to answer every question.

Question 1: Do you consider the Local Plan legally compliant in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012?	
	Reps received
Yes	323 (5%)
No	5,132 (76%)
No Response	1,271 (19%)
Question 1: Please provide an explanation below	
Response	5,225 (78%)
No Response	1,500 (22%)
Question 1a: Please set out the modifications you consider necessary to make the Local Plan legally compliant including revised wording of any policy or text.	
Response	100 (1.5%)
No Response	6,625 (98.5%)

Question 2: Does the Local Plan comply with the Duty to Co-operate?	
	Reps received
Yes	286 (4%)
No	5,183 (77%)
No Response	1,256 (19%)
Question 2: Please provide an explanation below	
Response	5,251 (78%)
No Response	1,474 (22%)
Question 2a: Please outline any changes to the approach taken which you consider necessary to ensure the Duty to Co-operate is met.	
Response	100 (1.5%)
No Response	6,625 (98.5%)

Question 3: Do you consider the Local Plan 'sound'?	
	Reps received
Yes	174 (2.5%)
No	6,056 (90%)
No Response	498 (7.5%)
Question 3: If no this is because you consider the Local Plan is NOT:	
Positively Prepared	213 (3%)
Justified	359 (5%)
Effective	275 (4%)
Consistent with National Policy	291 (4%)
No Response	6,204 (92%)
Question 3a: Please provide an explanation below and identify the main issues.	
Response	6,595 (98%)
No Response	130 (2%)
Question 3b: Please set out the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text.	
Response	506 (7.5%)
No Response	6,219 (92.5%)

Question 4: If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?	
	Reps received
Yes	360 (5%)
No	188 (3%)
No Response	6,177 (92%)

Question 6: Do you wish to be notified of the following:	
	Reps received
Submission of the Local Plan for Examination	502 (7.5%)
Publication of the Inspector's Report	500 (7.5%)
Adoption of the Local Plan	500 (7.5%)
No Response	6,220 (92%)

*Note that these percentages will not all total 100% as respondents were able to tick as many options as they felt applicable.

A small number of representations were received after the closing date. Those that were received by email within two hours of the closing time (i.e. by 6pm on 18th March 2025) were deemed ‘duly made’ to allow for any potential delays in emails reaching the Council’s mailbox. These have been analysed and included in the figures in this report. Others received after 6pm were deemed not ‘duly made’.

29 of the representations were partly ‘inadmissible’ due to their content, so the comments have been included but with the inadmissible part redacted. An additional 3 representations had no address details and were not accepted.

A significant number of representations were received by email from ‘Say no to Hammonds Farm’ - a coalition of Councillors from Boreham, Sandon, Danbury and Little Baddow Parish Councils, expressing opposition to new development at Strategic Growth Sites 16a Chelmsford East Garden Community and 16b Land Adjacent to A12 Junction 18 Employment Area.

All the comments received can be viewed in full on the Council’s planning policy consultation portal.

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

To view comments, you need to:

- Choose the event you would like to view comments for
- Select 'learn more' to open the event page
- Click on the ‘what people say’ tab to display a list of all the comments.

You can read all comments, or sort by name or date we received them. Where additional information such as reports or maps were submitted with a comment, these are listed at the end of the comment in PDF format and can be viewed or downloaded.

Responses to the Pre-Submission consultation included in the complete version of the full document are prefixed PS25. Responses to the stand-alone questionnaire are prefixed PSQ25. You can find out more about using the consultation portal in our guidance notes.

Section 3: Summary of the main issues raised

This section contains a high-level summary of the main issues and changes requested in the Pre-Submission Local Plan document order.

It specifies who has made comments from public sector bodies, infrastructure or service providers and developers/landowners in brackets at the end of relevant bullet points in the 'Summary of Representations' text. This is because it is useful to understand the nature of respondents, particularly where a stakeholder has a legal duty or responsibility over a matter that they are making comments about. It does not specify who has made comments from members of the public as to do so would result in a very long report, so bullet points from the public do not a have brackets.

It should be noted that in some cases, members of the public raised similar points to stakeholders. This is especially the case in relation to comments made by Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group to Strategic Growth Sites 16a (Hammonds Farm) and 16b (Junction 18 of the A12) which have been replicated and amplified by many individuals. To avoid duplication, these comments have not been repeated in the public comments. However, this does not affect the consultation process as this report focuses on the main issues received rather than the number of representations to any individual section of the plan.

Main respondents made the same Duty to Cooperate comments in multiple representations. We have sought to report the main issues raised against the Introduction so they can be read together and to avoid duplication. We have also reported the main issues against the most relevant part of the Local Plan.

It is important to note that this report does not summarise every representation or identify every individual detailed issue, as the purpose is to identify main issues and requested changes. It also does not seek to analyse or provide a Chelmsford City Council (CCC) response to the comments. We will be assessing all the information received and will provide a high-level response to the main issues raised in the Regulation 22 Consultation Statement. This statement will set out how the council has consulted and engaged with communities and stakeholders when preparing the review of the Local Plan and is a submission document for the examination.

Introduction

Consultation point	Total number of responses
Introduction	22

Summary of Representations – main issues and suggested modifications:

- Welcome the ongoing engagement with Historic England and the plan. Acknowledge the work to prepare the Heritage Impact Assessments and integrating their recommendations into the plan (Historic England PSQ25-5798 & 5800)

- Consider the plan ‘sound’ regarding the aspects relevant to our natural environment remit (Natural England PSQ25-6239)
- The Council has complied with the relevant regulations regards its duties to the Integrated Care Board as a statutory consultee (Integrated Care Board PSQ25-5122)
- Welcome the plan’s approach to health and wellbeing and is satisfied that it suitably addresses both creating healthy communities and securing healthcare infrastructure (Integrated Care Board PSQ25-5122)
- Duty to Co-operate requirements have been met. The Council is encouraged to continue to positively and constructively engage on strategic cross-boundary issues particularly in the context of infrastructure (Brentwood Borough Council PSQ25-6159, Rochford District Council PSQ25-6194)
- The Council has complied with its duty to cooperate with regards the county council’s statutory responsibilities. The plan and its evidence base reflect our active involvement throughout the plan preparation and ensures that ECC’s infrastructure and services are identified and can be delivered (Essex County Council PS25-181)
- Support for the Council’s decision to review their Local Plan and welcomes the clarity on its draft proposals (Uttlesford District Council PSQ25-5263)
- Significant cross-boundary engagement has taken place throughout the preparation of the plan, effectively addressing the requirements of Duty to Co-operate (Brentwood Borough Council PSQ25-6157)
- The Local Plan appears to be legally compliant and to align with the Duty to Cooperate (Chelmsford Garden Community Consortium PSQ25-6531, Vistry Group PSQ25-6373)
- Council must justify/do more to justify how they have considered the unmet housing needs of Basildon, Castle Point and/or Southend-on-Sea Councils including evidence of Duty to Cooperate engagement (Redrow Barratt PSQ25-5165, Obsidian Strategic Asset Management Ltd PSQ25-5667)
- Additional work is required to show that the Duty to Cooperate has been complied with following requests to help meet unmet needs from neighbouring Councils. The Duty to Cooperate evidence base is contradictory in this respect. The Plan should also consider unmet needs arising in London (Richborough PS25-165, PS25-177)
- Concern if the Council can demonstrate compliance with the duty to co-operate in relation to meeting unmet housing needs of other authorities despite formal requests, where it should be seeking to plan positively to assist them (Gladman Developments Ltd PSQ25-6316, PSQ25-6317, PSQ25-6309)
- The Statements of Common Ground fail to demonstrate adequate and meaningful engagement with neighbouring authorities on potential unmet needs, including Rochford, Castle Point, and Southend (A.G. & P.W.H. Speakman PSQ25-3043, Weal Properties Ltd PSQ25-3073, Mrs R Armstrong and Mr B Howard Ms Becky Armstrong PSQ25-3079, PSQ25-3038)
- Broad support for the preferred approach which moves Chelmsford further towards the new vision of a greener, more connected district (Broomfield Parish Council PSQ25-5149)
- Para 1.30 - request that the Council updates their Duty to Cooperate Statement and Statement of Common Ground prior to submission (Essex County Council PS25-182)

- The Plan needs to accommodate the 20% shortfall in the housing numbers arising from use of the transitional arrangements and identify safeguarded land from the Green Belt for growth beyond this Plan Period (Croudace Homes PSQ25-6053)
  Additional work is required to show that the Duty to Cooperate has been complied with (Home Builders Federation PSQ25-5471) including requests to help meet unmet needs from neighbouring Councils. The Plan should also consider unmet needs arising in London (Richborough PS25-173, PS25-167, PS25-170, PS25-174)
- General support the approach to growth but inadequate justification to not meet (at least some of) the unmet need of neighbouring councils. Expand SGS3 to assist with early delivery in the Plan period and in meeting the unmet need of Chelmsford and neighbouring authorities (Barratt Redrow PSQ25-5164)
- The Council must demonstrate how they have sought to engage with neighbouring authorities regards their unmet needs. The average annual completion rate has been considerably below the local housing needs figure of 1,210 since 2013. Plan should be meeting the full assessed need, as required by the NPPF and to significantly boost the supply of homes (Obsidian Strategic Asset Management Ltd PSQ25-5704)
- The consultation documents are complicated and difficult to navigate (Woodham Walter Parish Council PSQ25-5836)
- There are inconsistencies between satisfying the NPPF transitional arrangement for plan-making and those relating to decision-taking requiring an early review of the plan (Rosehart Properties Ltd PSQ-3144)
- The time frame from submission to adoption is unlikely to be achievable – extend the plan period to ensure it is 15 years (Martin Grant Homes PSQ25-2603, Greystoke CB PSQ25-6070)
- Plan is unsound. There is no direct evidence of engagement councils in South Essex to understand if they have any unmet needs (House Builders Federation PSQ25-5469)
- The plan should state when engagement with neighbouring authorities will take place and when and how the results of this will be made available to residents
- This plan should be put on hold until a new unitary authority has been created so that a plan will work for the new authority.

About Chelmsford

Consultation point	Total number of responses
About Chelmsford	10

Summary of Representations – main issues and requested changes:

- New green and blue infrastructure should be in accordance with Natural England's Green Infrastructure Framework – Principles and Standards for England (Essex Wildlife Trust PSQ25-5056)

- The Key Strategic Objectives at para 2.14 should also refer to the natural environment (Natural England PSQ25-6240, Essex Wildlife Trust PSQ25-5056)
- Update figure 11 to list all 'outstanding' performing schools (Essex County Council PS25-185)
- Para 2.29 - the description of ARU is underplayed and should mention of its alliance with Cambridge and its campus there (J & T Wardrop and the Wardrop Trust PS25-104)
- Engage with Essex Police to ensure safe and secure communities for current and future residents (Essex Police PSQ25-2650)
- The Green Belt skews the development of Chelmsford towards damaging the arguably more important landscapes to the north and east of Chelmsford. Agree that flood control is important (Chelmsford Rivers and Canal Link group PS25-273)
- Figure 5 does not mention commuters from the North West corridors such as Cambridge.

What are our Strategic Priorities

Consultation point	Total number of responses
What are our Strategic Priorities	46

Summary of Representations – main issues and requested changes:

- Support for all nine strategic priorities (Dominus Chelmsford PSQ25-6200, Croudace Homes PS25-350).

Strategic Priority 1

- Support for Strategic Priority 1 (Essex Wildlife Trust PSQ25-5057, Dandara PSQ25-6271, Sport England PS25-72)
- Welcome the reference relating to stand-alone renewable generation (Infrabee PSQ25-5731)
- Welcome the reference to nature-based solutions and the Essex Local Nature Recovery Strategy (Natural England PSQ25-6241)
- Recommend the use of Secured by Design (SBD) Police Preferred Security Products, which support sustainability agendas and last longer (Essex Police PSQ25-2651)
- Allocating a stand-alone new settlement at Hammonds Farm does not achieve the objective to allocate development in the most sustainable locations (Dandara PSQ25-6008)
- The current approach to defining sustainable locations for development based on settlement boundaries is overly reliant on arbitrary boundaries and a flexible greener outlook could be adopted i.e. walking distance to key services (Mrs Helen Sadler, PS25-32)

- This section seems to rely very heavily on planting trees and related activities with very little attention to care of the watercourses (Chelmsford Rivers and Canal Link group PS25-274)
- Requirements will be challenging for the developers; there are some very worthy, but very limited policies of how these challenges will be met for existing infrastructure without any plan or timescales of how this be achieved.

Strategic Priority 2

- Support for consideration of development layouts which create walkable communities (Sport England PS25-73)
- Recommend engagement to ensure new walking and cycling routes are designed to deter the fear of crime, and in new and existing public realm and green spaces so that women and girls feel included and comfortable (Essex Police PSQ25-2651)
- Consideration should be given to: Home Office strategy of reducing 'Violence Against Women and Girls'; Safer Parks Executive Summary (greenflagaward.org) (Essex Police PSQ25-2651)
- The draft Plan does not prioritise development in already sustainable locations, such as a promoted site off Galleywood Road, Great Baddow (Obsidian PSQ25-5932), or North-West Chelmsford (Dandara PSQ25-6009)
- It is important that the Local Plan allocates homes in locations which are already accessible by these modes of transport (Dandara PSQ25-6278).

Strategic Priority 3

- Support for the protection of national and locally designated sites, wildlife habitats, and multi-functional green-blue infrastructure (Natural England PSQ25-6454)
- Local Plans should ensure that land of the least environmental value is allocated for development, with a mitigation hierarchy which informs opportunities for enhancement and to maintain connectivity through local ecological networks/wider Nature Recovery Network; and take into account the principles set out in the Nature Recovery Handbook and respond to the Essex LNRS (Essex Wildlife Trust PSQ25-5058)
- Agree that these enhancement measures should be incorporated into the layout of developments wherever possible (Dandara PSQ25-6280)
- It is imperative that the ongoing use of the allotment site at Princes Road, Chelmsford should be maintained, and any future change of use (due to potential sale of land) of should be resisted. Any change of use would increase the area's allotments deficit. It is a green space and wildlife corridor, allotment gardening promotes healthy living, and the allotment association has strong community links (Princes Road Allotment Association PS25-46)
- The current approach to defining sustainable locations for development based on settlement boundaries is overly reliant on arbitrary boundaries and a flexible greener outlook could be adopted i.e. walking distance to key services (Mrs Helen Sadler, PS25-33)
- Hammonds Farm offends Strategic Policy 3 (J & T Wardrop and the Wardrop Trust, PS25-108).

Strategic Priority 4

- Support for Strategic Priority 4 (Writtle Parish Council PSQ25-440, Mrs Mary Rance PSQ25-6496)
- Welcome the updates relating to waste management guidance (Environment Agency PSQ25-6263)
- Agree the Local Plan should ensure sustainable growth, which should be provided at a variety of settlements and sizes including smaller sites in urban areas where higher densities are appropriate (Dandara PSQ26-6281)
- Wording needs to be changed to reflect the new NPPF in respect of grey belt land (J & T Wardrop and the Wardrop Trust PS25-105)
- The next Local Plan Review should involve a full review of the Green Belt boundaries and seek to identify Grey Belt areas in order fully to accommodate the new NPPF calculated housing and employment needs (Rosehart Properties Ltd PSQ25-3167)
- Concerned that this places a restriction on development in the Green Belt without assessing the potential and opportunities for sustainable development in these locations (Higgins Group PSQ25-5621)
- Sustainable sites within the Green Belt should be safeguarded to meet future development needs, through a Green Belt review (Croudace Homes PSQ25-6039)
- The Local Plan needs to include more previously developed land in the rural area for development, and more smaller sustainable sites of 1 hectare or less in the rural area (Mr and Mrs Andrew Parker PS25-131)
- The current approach to defining sustainable locations for development based on settlement boundaries is overly reliant on arbitrary boundaries and a flexible greener outlook could be adopted i.e. walking distance to key services (Mrs Helen Sadler, PS25-35)
- This does not pursue opportunities to enhance the sustainability of existing service settlements, and to recognise that an opportunity exists to deliver new infrastructure, services and facilities which would benefit these settlements so they grow and thrive, especially where this will support local services. Suggest adding an additional strategic priority or amending Strategic Priority 4 (Croudace Homes PS25-350).

Strategic Priority 5

- Agree the Local Plan should meet housing needs in full, and allocate sites which are capable of delivery in the Plan period (Dandara PSQ25-6282)
- Questions how the requirement to significantly boost the supply of housing and achieve this strategic priority can be met without considering the whole of the plan area for growth and development opportunities (Higgins Group PSQ25-5622).

Strategic Priority 6

- Suggested modification to include reference to meeting local and wider strategic needs, and to allocating new employment areas (Greystoke CB PSQ25-6072)
- The Local Plan needs to include more previously developed land in the rural area for development, and more smaller sustainable sites of 1 hectare or less in the rural area. Also suggest changing the settlement boundary for Chatham Green as it allows for no growth in the village, to include the industrial site at Pondside Nursery (Mr and Mrs Andrew Parker PS25-131, PS25-99).

Strategic Priority 7

- Support for Strategic Priority S7 (Sport England PS25-74)
- Recommend engagement to ensure the built environment is designed to be safe, sustainable and inclusive for all future users, to align with Essex Police Fire and Crime Commissioners plan of creating safe communities (Essex Police PSQ25-2651)
- Advised that there may be a need to engage with specialist policing teams (such as Roads Policing, Counter Terrorism Security Advisors etc) when designing new communities to ensure the necessary security measures are in situ including for alterations to road layouts or new road infrastructure (Essex Police PSQ25-2651)
- Recommends all new developments achieve Secured by Design (SBD) accreditation (secured via planning condition); and take consideration of the Home Office strategy of reducing 'Violence Against Women and Girls' (Essex Police PSQ25-2651)
- Recommends reference is made to the positive effect of good design on waste reduction and recycling and the Essex Waste Partnership's Waste Strategy for Essex 2024 – amended wording suggested to Para 3.32 (Essex County Council PS25-186)
- Recommends reference is made to waste infrastructure – amended wording suggested to Para 3.37 (Essex County Council PS25-187).

Strategic Priority 8

- Welcome the approach to ensuring that the community's sports and leisure needs generated by new development are met without placing pressure on existing facilities which may already be at capacity (Sport England PS25-75)
- Local Plan has been positively prepared with regards to water resources, and the Water Cycle Study should be regularly updated throughout the Plan's life cycle with ongoing engagement with Essex and Suffolk Water (Environment Agency PSQ25-6291)
- Suggested modification to include primary, acute, community and mental healthcare provision (East of England Ambulance Service NHS Trust PSQ25-5232)
- Sustainable sites within the Green Belt should be safeguarded to meet future development needs and address pressure on infrastructure, through a Green Belt review (Croudace Homes PSQ25-6040)

- Recommend adding a reference to further work being undertaken to consider the traffic impact on local junctions and proposed mitigation measures – amended wording suggested to para 3.40 (Essex County Council PS25-188)
- Recommend adding a reference to gigabit speed broadband for clarity and consistency with ECC best practice policy – amended wording suggested to Para 3.42 (Essex County Council PS25-189).

Strategic Priority 9

- Welcome the approach to ensuring that the community's sports facility needs are met to support the increased population of the district (Sport England PS25-76).

Our Vision and Spatial Principles

Vision for Chelmsford

Consultation point	Total number of responses
Vision for Chelmsford	16

Summary of Representations – main issues and requested changes:

- Support expressed for Vision (Rosehart Properties Ltd and Bressole Ltd PSQ25-5300, Dandara PSQ25-6010, Dominus Chelmsford Limited PSQ25-6199, Wates Developments and Hammonds Estates LLP PS25-335, Sport England PS25-77, Broomfield Parish Council PSQ25-6492)
- The Local Plan aligns strongly with our vision for Site 16a East Chelmsford Garden Community (Hammonds Farm) (Wates Developments and Hammonds Estates LLP PS25-335)
- Welcome the opportunity to work in partnership on future development to design out crime (Essex Police PSQ25-2654)
- Plan should do more to at least meet minimum housing needs in full - there are a range of other housing sites which should be supported (Martin Grant Homes PSQ25-2606)
- Vision should include the recreational use of the canals, waterways and Sandford Mill (Essex Waterways Ltd PSQ25-5204)
- It is unclear how the bullet points will be used by decision-makers (Dandara PSQ25-6292)
- Clarify if bullets form part of the vision (Dandara PSQ25-6292, Richborough PS25-164)
- Clarify in the vision that development needs are to be met in full, including for market and affordable housing (Richborough PS25-164)
- Hammonds Farm will not lead to a more connected community and does not accord with the Vision for Chelmsford by 2041 or seek to achieve it (Dandara PSQ25-6010)
- Expand bullet two to specifically refer to supporting the logistics sector (Greystoke CB PSQ25-6073)

- For consistency, expand bullet nine to refer to ‘fire and rescue facilities’ (Essex County Fire & Rescue Service PSQ25-6093)
- Amend bullet 19 to refer to facilitating the provision of gigabit speed broadband (Essex County Council PS25-190)
- Add a reference to the Chelmer Valley landscape as a key asset at the heart of long-term spatial planning in Chelmsford and a long-term aspiration of achieving a formal designation, recognising its wider, indeed, national significance (Chelmer Valley Landscape Group PSQ25-5135)
- Amend vision to acknowledge the importance of community facilities (Chelmsford City Football Club PS25-212)
- The current approach to defining sustainable locations for development based on settlement boundaries is overly reliant on arbitrary boundaries and a flexible greener outlook could be adopted i.e. walking distance to key services (Mrs Helen Sadler PS25-42)
- Alternative strategies and site allocations promoted by landowners/developers.

Spatial Principles

Consultation point	**Total number of responses**
Strategic Policy S1 - Spatial Principles	40

- Support expressed for Spatial Principles (Redrow Barratt PSQ25-5165, Obsidian PSQ25-5935, Crest Nicholson PSQ25-6069, Dominus Chelmsford Limited PSQ25-6201, Environment Agency PSQ25-6264, Gladman Developments Ltd, PSQ25-6309, Richborough PS25-165, Vistry Group PS25-294, Wates Developments and Hammonds Estates LLP PS25-336)
- Support except b and f. A Green Belt is required to accommodate future growth requirements (Rosehart Properties Ltd and Bressole Ltd PSQ25-3173)
- Disagreement expressed to part e. A Green Belt review is required to identify sustainable development opportunities in the Green Belt and so that a more balanced approach to the spatial strategy can be achieved
- Support all except e. The settlement hierarchy is not a robust basis for identifying sustainable development locations. Amend to enable settlements outside the Green Belt to protect or create local services through targeted development, where appropriate (Broomfield Parish Council PSQ25-5150)
- Unclear how the principles will be used together and alongside the 2024 NPPF in decision making including for development proposals in the Green Belt (Higgins Group PSQ25-562)
- The Spatial Principles must also consider the urgent need for housing to avoid worsening housing supply and affordability in Essex (Obsidian Strategic Asset Management Ltd PSQ25-5667)
- A new settlement away from Chelmsford’s urban area does not follow the principles promoted (Obsidian PSQ25-5935, Dandara PSQ25-6011, PSQ25-6293)
- Focusing new development upon higher order settlements outside the Green Belt (part e) will result in an increasingly unsustainable pattern of

development. There has been a consistent failure to undertake a Green Belt Review to identify opportunities for sustainable development on land which no longer meets Green Belt purposes (Barratt David Wilson - Eastern Counties (BDW) PSQ25-6032)

- Amend part c to 'optimise' rather than 'promote' previously developed land for development to better reflect the 2024 NPPF (Dominus Chelmsford Limited PSQ25-6201)
- Parts a and e - Additional growth is required in villages to ensure that they retain their vitality and viability and help meet the housing requirements of the Standard Method (Dandara PSQ25-6293)
- Amend policy to state that the principles are a starting point for determining speculative applications (Gladman Developments Ltd PSQ25-6309)
- Policy should include express support for development that enables and supports healthy lifestyles and advance the well-being of communities (Chelmsford City Football Club PS25-212)
- Policy should be underpinned by a Green Belt Review, demonstrating that the Spatial Strategy is based upon the most sustainable options for meeting Chelmsford's long-term development needs. Exceptional circumstances exist to justify a Green Belt Review (Vistry Group PS25-294)
- Add an additional Spatial Principle to enhance the vitality and sustainability of existing service settlements (Croudace Homes PS25-353)
- The current approach to defining sustainable locations for development based on settlement boundaries is overly reliant on arbitrary boundaries and a flexible greener outlook could be adopted i.e. walking distance to key services (Mrs Helen Sadler PS25-37, PS25-38, PS25-40, PS25-41, PS25-43)
- Need to undertake a Green Belt Review to appraise the opportunities for sustainable development on land that does not contribute strongly to the purposes of the Green Belt
- Amend para 4.7 to reflect the new NPPF (J & T Wardrop and the Wardrop Trust PS25-106)
- Amend para 4.11 to align with para 4.12 to reflect that not only redevelopment within the city but also expansion around settlements can enhance its vitality (Crest Nicholson PSQ25-6069, Taylor Wimpey Strategic Land PS25-311, Higgins Homes PS25-346)
- Amend para 4.15 to include expanded/relocated healthcare services and expanded/relocated emergency services (East of England Ambulance Service NHS Trust PSQ25-5235)
- Amend para 4.15 to include waste infrastructure (Essex County Council PS25-191)
- Amend para 4.16 to include emergency services facilities (East of England Ambulance Service NHS Trust PSQ25-5237)
- Amend para 4.16 to include fire & rescue facilities as a type of infrastructure (Essex County Fire and Rescue Service PSQ25-6095)
- Amend para 4.16 to include police facilities as a type of infrastructure (Essex Police PSQ25-6125)
- Amend para 4.16 to include recycling and other waste infrastructure (Essex County Council PS25-192)

- Engage Essex Police to ensure new infrastructure during construction and the final building stage are safe and secure and do not compromise Emergency Service Access (Essex Police PSQ25-2655)
- Alternative strategies and new/expanded site allocations promoted by landowners/developers including 'Grey Belt' land.

Creating Sustainable Development

Strategic Policy S2 – Addressing Climate Change and Flood Risk

Consultation point	Total number of responses
Strategic Policy S2 – Addressing Climate Change and Flood Risk	16

Summary of Representations – main issues and requested changes:

- Welcome reference to South East (Inshore) Marine Plan (Natural England PSQ25-6242)
- Support new development to provide for active and sustainable travel modes in recognition of the contribution that this can make locally to addressing climate change (Sport England PS25-78)
- Support additions to reasoned justification to include the recommended guidance documents relating to SuDS. Consider additionally or alternatively referring to the guidance under Policy DM18 for improved visibility within the Plan (Environment Agency PSQ25-6265)
- Support the policy and evidence in relation to minimising the risk of flooding from development. To complement the Council's evidence and demonstrate the acceptability of the Hammonds Farm site in flood risk terms, a Flood Risk Strategy is submitted. This sets out the flood performance of the high-level masterplan proposals has been tested in detail with a hydraulic model constructed in 2025, building upon existing EA models. Based on this technical work, there are no flood risk technical constraints identified that would impact the site's deliverability in flood risk terms (Wates Developments and Hammonds Estates LLP PS25-308)
- Support for the policy, but suggest it should also explicitly emphasise support for large-scale renewable energy infrastructure, such as solar farms and energy storage systems (Infrabee PSQ25-5735)
- Future development should take into account and protect rural landscapes and character and also the impact upon drainage and SuDS (Chelmsford Garden Community Council PSQ25-4962)
- Supports the Council's ambition to reduce carbon emissions, however, any emission reduction targets that go beyond Part L of the Building Regulations should consider the forthcoming '2025 Future Homes Standards' and therefore not set a policy expectation that cannot be delivered and create viability issues, especially for existing Local Plan site allocations (Chelmsford Garden Community Consortium PSQ25-6347, Vistry Group PSQ25-6370, Hopkins Homes PS25-263, Vistry Group PS25-133)

- Supports the Council's ambition to reduce carbon emissions, but the policies as drafted (including DM31) go beyond national policy and guidance without evidence to justify the approach towards net zero operational and the use of on-site renewables to provide all (regulated and unregulated) operational energy. In line with the PPG that locally set energy performance standards for new housing should not exceed the equivalent of Level 4 of the Code for Sustainable Homes. The policies should not be a requirement but applied flexibly (Croudace Homes PSQ25-6041)
- Requirements of the policy and subsequent Development Management policies (DM25 and DM31) have not been sufficiently tested regarding viability for older persons housing (Churchill Living and McCarthy Stone PSQ25-6332)
- The Regulation 19 Viability Note (November 2024) ascribes broad values across the plan area but does not address site specific matters insofar as they relate to Strategic Growth Site 3a. It suggests that the requirement for SANGs "…is only likely to apply to the Hammond's Farm strategic site". However, Natural England's Reg. 18 consultation response has asked that SSSI mitigation be included as a requirement for Strategic Site 3a and there is no indication that it has been considered as part of the Council's viability assessment (Hopkins Homes Ltd PS25-265)
- Although some interventions to mitigate and adapt to climate change will also have positive impacts for biodiversity, it should not be required of BNG measures to have to mitigate and adapt to climate change. The requirement "Assists the delivery of Biodiversity Net Gain that will deliver mitigation and adaptation benefits" will be difficult to evidence for applications and make it more difficult to deliver biodiversity enhancement schemes (Dandara PSQ25-6294)
- Clarify the policy purpose - second sentence should be deleted and first sentence amended to make clear that the bullets that follow are references to specific development management policies. The first two bullet points should be deleted (Vistry Group PS25-133).

Strategic Policy S14 - Health and Wellbeing

Consultation point	**Total number of responses**
Strategic Policy S14 - Health and Wellbeing	12

Summary of Representations – main issues and requested changes:

- Support for policy (Broomfield Parish Council PSQ25-6493, Cliffords Group Ltd PSQ25-3028)
- Support the policy requirements accord with Sport England's Uniting the Movement Strategy and are consistent with the NPPF (Sport England PS25-79)
- All new development proposals should have early engagement with Essex Police, to support and expedite this policy and support and mitigate crime prevention (Essex Police PSQ25-2658)
- Welcome a reference to improving public angling opportunities where developments are adjacent to rivers or lakes (Environment Agency PSQ25-6270)

- Support for policy but it should be expanded to refer/reflect the needs of older people (Mrs Mary Rance PSQ25-6392)
- In the first bullet, also refer to the Essex Joint Health and Wellbeing Strategy to help reduce health inequalities including health and improve the opportunities for adults and children to live well (Essex County Council PS25-195)
- The Council should not view the provision of sports, leisure, and community facilities as a minimum requirement but should maximize opportunities to deliver such development in well-connected and accessible locations (Cliffords Group Ltd PSQ25-3028, PSQ25-4982)
- Remove the requirement on older persons housing providing a Health Impact Assessment as specialist housing for older people has a number of health benefits. Amended wording proposed (Churchill Living and McCarthy Stone PSQ25-6331)
- Health Impact Assessments should not be required on all developments over 50 homes especially if they are allocated in the plan and meet the policy requirements. It should only be required on unallocated developments of over 100 units which will not have had their health impacts assessed as part of the preparation of the local plan (Home Builders Federation PSQ25-5475)
- Amend para 5.26 to refer to `Use Class C2 (Residential Institutions)' to provide consistency with the policy and the EPOA Essex Healthy Places Advice notes for planners, developers and designers (Essex County Council PS25-196)
- Promoted sites (Land south of Pratts Farm Lane, Land at Essex Regiments Way and Back Lane) align with the vision of this policy by promoting active and healthier lifestyles (Cliffords Group Ltd PSQ25-3028)
- Alternative strategies and new/expanded site allocations promoted by landowners/developers.

Strategic Policy S15 – Creating Successful Places

Consultation point	**Total number of responses**
Strategic Policy S15 – Creating Successful Places	2

Summary of Representations – main issues and requested changes:

- All new development proposals should have early engagement with Essex Police, to support the prevention and mitigation of crime across developments (Essex Police PSQ25-2659)
- Question need for the policy as it appears to be covered by other policies in the plan or NPPF (Dandara PSQ25-6014).

Strategic Policy S3 – Conserving and Enhancing the Historic Environment

Consultation point	**Total number of responses**

Strategic Policy S3 – Conserving and Enhancing the Historic Environment	5

Summary of Representations – main issues and requested changes:

- Support policy (Historic England PSQ25-5815)
- Welcome the policy and great weight on the preservation/enhancement of designated heritage assets and their setting (Writtle Parish Council PSQ25-453)
- Welcome the recognition of the heritage and leisure importance of the waterway (Chelmsford Rivers and Canal Link group PS25-275)
- As operators of the Chelmer & Blackwater Navigation we are pleased to see that the significance of its structures, landscape character, leisure and recreational value are recognised (Essex Waterways Ltd PSQ25-5205)
- Support policy and its commitments including to celebrate Chelmsford's 'rich history. Support the creation of a Heritage Reference Group, for the waterways to be considered as Heritage Assets and a policy to educate young people on heritage. The Meadows development provides an opportunity to enhance riverside walks and there should be plans for the future use of Sandford Mill and Shire Hall (Chelmsford Civic Society PSQ25-2707).

Strategic Policydm16– Conserving and Enhancing the Natural Environment

Consultation point	**Total number of responses**
Strategic Policy S4 – Conserving and Enhancing the Natural Environment	15

Summary of Representations – main issues and requested changes:

- Support for policy (Broomfield Parish Council PSQ25-6494)
- Pleased with policy wording and satisfied that wastewater treatment capacity and local water environment will be protected by the plan policies (Environment Agency PSQ25-6266)
- Supports the requirement for new development to maximise opportunities for the preservation and connection of natural habitats in accordance with the Essex Local Nature Recovery Strategy (LNRS (Essex County Council PS25-198)
- Supports policy requirements for BNG. Viability assessments carried out by ECC demonstrates that a 20% BNG is achievable and viable and meets the NPPF requirements. The Environment Act sets 10% as the minimum standard nationally and does not set a maximum (Essex County Council PS25-197)
- Support expressed for the policy including 20% BNG in garden community developments but clear evidence will be required by the Planning Inspector to justify this policy requirement (Essex Wildlife Trust PSQ25-5059)
- Support for this policy which does not require applications to provide more than 10% BNG, other than the Garden Communities (Dandara PSQ25-6295)

- The Natural Environment section of the PPG has been recently updated to cover the role of Local Nature Recovery Strategies (LNRSs). This guidance helps local planning authorities to interpret their duty to “have regard” to LNRSs and integrate LNRSs into local plans and considering them in planning decisions as material considerations (Essex County Council PS25-198)
- The Council's 'Improvement Plan for Rivers and Waterways in and around Chelmsford is supported. We plan to work with the Council to implement its aims (Essex Waterways Ltd PSQ25-5206)
- Para 5.55 – Welcome the reference to additional recreational mitigation measures to address ‘alone’ impacts of new development within the RAMS Zone of Influence (Natural England PSQ25-6243)
- Expand last para of the policy to refer to ‘other mitigation measures’ and ‘future iterations’ of the RAMS in line with para 5.55 (Natural England PSQ25-6243)
- Para 5.47 - Planting around the waterways should not be allowed to interfere with the public enjoyment of the waterways or conceal the rivers from public view. The plan appears to be too heavily skewed away from use of the waterways and this imbalance should be addressed (Chelmsford Rivers and Canal Link group PS25-276)
- Para 5.49 should also require applicants to have regard to the Essex Green Infrastructure Standards (2022) to facilitate securing multifunctional green infrastructure. This has been endorsed by Natural England and aligns with the National Green Infrastructure Framework (Essex County Council PS25-200)
- Delete requirement for developers to demonstrate that wastewater treatment capacity is available ahead of any occupation of development as it is unnecessary and impractical. The Local Plan provides the means, through its evidence base (particularly the WCS), to ensure that new development is located in areas that have the potential to be served by sufficient waste-water capacity (Vistry Group PS25-135)
- The plan should give strong weight to LNRSs for development site allocation at a local level to avoid impacts to existing sensitive natural assets (The Woodland Trust PSQ25-1984)
- The plan should set standards for high-quality green infrastructure for development e.g. by requiring 5 trees per dwelling for major development or per 1,000sqm of non-residential floorspace, and by ensuring no one is more than 300m from their nearest natural green space and set a strong standard for the retention of trees within developments (The Woodland Trust PSQ25-1984)
- The Local Plan should go beyond minimum requirements for BNG and be an example of best practice, e.g. by requiring all developments to deliver 20 % BNG and all units to be maintained for at least 50 years (The Woodland Trust PSQ25-1984)
- The requirement for 20% BNG has not been justified in the Council’s evidence base as being financially viable or practically deliverable/viable. It should be expressed as a target rather than an absolute requirement (Croudace Homes PSQ25-6042).

<u>Strategic Policy S5 – Protecting and Enhancing Community Assets</u>

Consultation point	Total number of responses
Strategic Policy S5 – Protecting and Enhancing Community Assets	8

Summary of Representations – main issues and requested changes:

- Support for policy (Sport England PS25-80, Dandara PSQ25-6013, Cliffords Group Ltd PSQ25-3007)
- It is imperative that the ongoing use of the allotment site at Princes Road, Chelmsford should be maintained, and any future change of use (due to potential sale of land) should be resisted. Any change of use would increase the area's allotments deficit. It is a green space and wildlife corridor, allotment gardening promotes healthy living, and the allotment association has strong community links (Princes Road Allotment Association PS25-46).
- Support policy in principle but it should be more flexible. Where it can be demonstrated that health facilities are surplus to requirements or will be changed, it should be accepted in principle that the facility is neither needed nor viable for its current use, with no requirement for retention of a community facility use on the land (NHS Property Services Ltd PSQ25-5602)
- For consistency, include a reference to "fire & rescue facilities" (Essex County Fire and Rescue Service PSQ25-6097)
- Para 5.58 – Include a reference to the Essex County Fire and Rescue Services role in creating 'resilient' communities (Essex County Fire and Rescue Service PSQ25-6098)
- Promoted sites (Land south of Pratts Farm Lane, Land at Essex Regiment Way and Back Lane) align with the policy (Cliffords Group Ltd PSQ25-3007)
- The allocation of promoted site adjacent to Great Baddow High School, provides an opportunity to address the objectives of this draft policy (Obsidian PSQ25-5936).

How will Future Development Growth be Accommodated?

This section of the consultation document sets out Strategic Policies which underpin and guide the Spatial Strategy including policies related to securing infrastructure and delivering growth.

Para 6.1 and Strategic Policy S6 – Housing and Employment Requirements

Consultation point	Total number of responses
Para 6.1 and Strategic Policy S6 – Housing and Employment Requirements	72

Summary of Representations – main issues and requested changes:

Windfall allowance

- Need to justify the windfall allowance and why it has increased from 100 to 175 dpa. 100 dpa is most appropriate as set out in the Housing Windfall Assessment, April 2024. The windfall rate appears retrofitted to meet the transitional arrangements and artificially inflates the supply (Richborough PS25-173, PSQ25-166)
- Evidence is needed to support a higher rate of windfall across the entire plan period (Home Builders Federation, PSQ25-5471) and basing it on historic trends is not robust (Bellway Homes Ltd (Essex) PSQ25-6360, PSQ25-6388)
- Windfall allowance should be reviewed considering current market conditions and reduced to reflect current delivery levels (Hill Residential Ltd PS25-354)
- The past windfall average includes 2 years of unusually high supply (350 homes) which disproportionately impacts the calculation and is unlikely to be maintained at a constantly high level over the plan period (Strutt and Parker (Farms) Limited PSQ25-5519)
- Plan is flawed and likely to be ineffective – there is an over reliance on windfall sites (Dandara PSQ25-6015, Dandara Eastern PSQ25-6209) meaning the plan is at risk of falling short on housing delivery (Urban Provincial PSQ25-4972)
- The timing of new housing supply needs to be justified. Windfall sites should be allocated if the Council is certain they will get planning permission (J & T Wardrop and the Wardrop Trust PS25-109)

Housing Requirement

- Support use of the NPPF transitional arrangements and housing requirement of 1,210 dpa. Acknowledge the Plan allocates a 'minimum' of 162,646sqm of new employment floorspace which exceeds the recommended minimum employment space requirements over the period to 2041 (Essex County Council PS25-201)
- Broadly supportive of policy and CCC's commitment to meeting its identified housing and employment needs within the administration's boundary through-out the plan period (Brentwood Borough Council PSQ25-6159, Rochford District Council PSQ25-6194)
- Accept the plan housing requirements (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6133)
- Largely supportive of the plan. 1,210 dpa is below full local housing needs but the reference to "minimum" strikes an appropriate balance (Dominus Chelmsford Limited PSQ25-6203)
- Support the identified housing requirement of 22,990 new homes as evidenced by the Strategic Housing Needs Assessment. This will assist in addressing the Council's Housing Crisis declared in 2022. Support utilising the NPPF transition arrangements which will avoid plan-making delays and exceeding the 2023 Standard Method figure of 955 dpa (Wates Developments and Hammonds Estates LLP PS25-310)
- There is no requirement to meet in full the new 2024 Standard Method figure of 1,454 dpa through this Local Plan Review (Wates Developments and Hammonds Estates LLP PS25-310)

- Plan is technically sound but should seek to meet housing requirements in full to address the housing crisis more effectively and allocate more homes including at Ford End (Dandara PSQ25-6296)
- Plan should be meeting housing needs in full (1,454 dpa) (Bloor Homes (Eastern) PSQ25-6141, Richborough PS25-173, PS25-166, Martin Grant Homes, PSQ25-2609, PS25-147), as required by the new NPPF, given the high cost of housing, need to address the housing crisis and need for affordable housing. The greater risk with strategic site delivery requires a higher buffer (Home Builders Federation PSQ25-5471)
- Object to the 1,210 dpa housing requirement/ it is not justified (Martin Grant Homes PSQ25-2609, PS25-147, Cliffords Group Ltd PSQ25-4958, Welbeck Strategic Land V Limited PSQ25-3210, Catesby Land and Planning PSQ25-5603, Greystoke CB PSQ25-6084)
- The SHNA needs to be updated to reflect the up-to-date standard method. Plan should be meeting its minimum housing needs to avoid exacerbating additional unmet housing needs in a region, address chronic affordability issues and deliver needs for affordable homes (Martin Grant Homes PSQ25-2609, PS25-147)
- A modest increase in dwelling stock or affordability ratios could result in the proposed housing requirement falling below 80% of the Standard Method figure. The plan should remain flexible to accommodate potential updates to the Standard Method to avoid becoming outdated before its adoption (Miscoe Enterprises Ltd PSQ25-2987, Cliffords Group Ltd PSQ25-2999, A.G. & P.W.H. Speakman PSQ25-3038, Daniel James Developments PSQ25-3054, Weal Properties Ltd PSQ25-3070, Mrs R Armstrong and Mr B Howard Ms Becky Armstrong PSQ25-3076, Cliffords Group Ltd & Mr Mark Peters PSQ25-6502, Cliffords Group Ltd PSQ4954, PSQ25-4956, The Bucknell Family PS25-286, Taylor Wimpey Strategic Land PS25-315, Crest Nicholson, Dandara Strategic Land, and Taylor Wimpey Strategic Land PS25-326)
- In the absence of overriding constraints or exceptional circumstances, the Plan should be meeting the Council's housing and affordable needs in full. This will significantly boost housing delivery and address the Written Ministerial Statement of January 2025 and the Council's declared Housing Crisis (Barratt David Wilson – Eastern Counties (BDW), PSQ25-6034)
- Providing for 1,210 dpa will result in a shortfall of 4,636 dwellings over the plan period and exacerbate acute affordability issues in Chelmsford. The change from Preferred Options appears to have been made to simply meet the transitional arrangements - further justification is required to evidence why meeting 83% is appropriate. There has been time to consider the 2024 NPPF and additional site allocations could be made to meet needs in full (Bloor Homes (Eastern) PSQ25-6141)
- The evidence base to support the housing requirement and supply is inadequate. It is unclear why adopted allocations have failed to come forward. The plan is reliant on a small number of large sites. Additional allocations are needed. Housing requirement appears to have been arbitrarily set to meet the transitional arrangements and should be more ambitious (Hill Residential Ltd PS25-354)
- There is no plan evidence to justify the uplift from 913 to 1,210 by any of the exceptional circumstances outlined in the PPG. The plan does not meet the transitional arrangements, should be meeting housing need in full and identify

additional sites for delivery in the first five years (Gladman Developments Ltd PSQ25-6313)

- Amend the housing requirement and allocate additional sites to increase the supply buffer. Rejection of a higher growth scenario and Land West of Chelmsford as it could result in 'too much' housing is contrary to national policy (Crest Nicholson, Dandara Strategic Land, and Taylor Wimpey Strategic Land PS25-326)
- Plan should allocate more sites to meet the full housing requirement of 1,454 dpa (Greystoke CB PSQ25-6084). Hammonds Farm is questionable based on the evidence base and planning logic and has unrealistic delivery rates as supported by 'Start to Finish' research from Lichfields. More sustainable sites have been dismissed without obvious reasoning including land at North-West Chelmsford and SWF (Dandara PSQ25-6015, Dandara Eastern PSQ25-6209)
- Need to increase housing requirement to help meet unmet needs outside Chelmsford (Strutt and Parker (Farms) Limited PSQ25-5519)
- Housing requirement should be increased to meet or exceed the revised Standard Method figure of 1,454 dpa to meet identified housing needs in full. 1,210 dpa will exacerbate housing affordability and fail to address the Council's declared Housing Emergency. Suggestions that meeting the full could lead to an oversupply of new homes is unsubstantiated, inconsistent with National Policy and not justified (Catesby Land and Planning PSQ25-5603)
- No objection to the new interim housing requirement, but advocate planning for the full 1,454 dpa and allocating further new sites in the plan including a combined site in Boreham (Wates Developments Limited PSQ25-5302)
- Completions in recent years is significantly below the new target of 1,210 net new homes risking a downward trend in housing delivery. Plan should allocate further sites including in the Green Belt/Grey Belt and increase the housing target to meet the NPPF (December 2024) requirements. The 1.8% supply buffer is inappropriate and not evidenced (Newell Properties Development Ltd PSQ25-5043)
- Notwithstanding the transitional arrangements, the plan should still seek to maximise opportunities to deliver housing. Rejecting a higher growth option as it could result in an 'oversupply' of housing is questionable (Taylor Wimpey Strategic Land PS25-315)
- Housing requirement should be reviewed considering Written Ministerial Statements (WMS) of 30 July and 12 December 2024 (Gearston Ltd PSQ25-3045). 1,210 dpa does not appear to be justified beyond its function in maintaining the plan within the transitional arrangements. Need to demonstrate how requirement aligns with current and future demographic trends and housing market signals. Need to reassess the site allocations and consider whether additional land could be released to ensure full housing needs are met (Miscoe Enterprises Ltd PSQ25-2987, Cliffords Group Ltd PSQ25-2999, A.G. & P.W.H. Speakman PSQ25-3038, Daniel James Developments PSQ25-3054, Weal Properties Ltd PSQ25-3070, Mrs R Armstrong and Mr B Howard Ms Becky Armstrong PSQ25-3076, Cliffords Group Ltd & Mr Mark Peters PSQ25-4966, Cliffords Group Ltd PSQ4954, PSQ25-4956, The Bucknell Family PSQ25-286, Crest Nicholson, Dandara Strategic Land, and Taylor Wimpey Strategic Land PS25-326)

- Concerns that the housing supply has been artificially suppressed to remain within the transitional arrangements. Need to allocate additional housing sites (The Bucknell Family PS25-286) to provide a generous and resilient supply buffer to support housing delivery over the plan period (A.G. & P.W.H. Speakman PSQ25-3038, Daniel James Developments PSQ25-3054, Cliffords Group Ltd PSQ4954)
- The proposed approach to housing delivery and housing requirements under the transitional arrangements, should be seen in the context of the notable housing crisis. Written Ministerial Statements set out a clear expectation that LPAs should take a positive stance to opportunities to deliver housing (Gearston Ltd PSQ25-3045)
- The Plan provides minimal flexibility should sites be delayed and existing allocations should be increased including Growth Site Policy 11c (Welbeck Strategic Land V Limited PSQ25-3210)
- Table 1 – The plan is planning for an insignificant and insufficient amount, meaning the plan lacks flexibility, is vulnerable to changing circumstances and is inconsistent with the Government's wider objectives. Concerns that sites allocated in the adopted Local Plan have not come forward including SWF. Given devolution, the review plan could be in place for a decade so should seek to significantly boost the supply of housing land, rather than just meeting the minimum requirements under the transitional arrangements (Croudace Homes PS25-356)
- Plan is flawed and likely to be ineffective – the 1.5% is inflexible and there is an over reliance on one large strategic allocation. Completions rates are falling, and the delivery of allocated sites are slipping and unrealistic. Hammonds Farm is questionable based on the evidence base and planning logic and has unrealistic delivery rates as supported by 'Start to Finish' research from Lichfields. More sustainable sites have been dismissed without obvious reasoning including land at North-West Chelmsford and SWF (Dandara PSQ25-6015, Dandara Eastern PSQ25-6209)
- 100 dwellings are insufficient to meet Danbury's housing needs identified in the Danbury and AECOM Danbury Local Housing Needs assessments to the detriment of the vibrancy and health of the settlement. Plan should allocate additional land in Danbury (Gleeson Land PSQ25-6262)
- The housing figure is not robust given that historical evidence could mean the target is 10% below average delivery of annual windfall dwellings (Mrs Helen Sadler PS25-28)
- The public have not been adequately consulted, and insufficient consideration has been given to the need to meeting affordable housing needs to address the Council's declared Housing Emergency
- The trajectory reflects the 1,400+ requirement rather than the 1,210 figure. If the plan is for 1,400+ homes, it should state that
- Alternative strategies and new/expanded site allocations promoted by landowners/developers.

Submission Date

- The Council is deliberately rushing to submission to avoid having to meet 1.454 dpa (Catesby Land and Planning PSQ25-5603, Barratt David Wilson – Eastern Counties (BDW) PSQ25-6034)
- Plan should meet Chelmsford's Local Housing Needs in full now and not avoid this by rushing submission

Supply buffer

- Reallocation of the supply buffer is pragmatic and appropriate, as the Council had already consulted on an evidence base to support a spatial strategy of this quantum and has updated it housing evidence to support a revised housing requirement. There is no national requirement for a buffer to be allocated in the supply trajectory, but if a supply buffer and/or a higher housing target would be beneficial, more sites could be sought via major modifications. There is land available within the allocation boundary of Strategic Growth Site 16a East Chelmsford Garden Community (Hammonds Farm) (Wates Developments and Hammonds Estates LLP PS25-310)
- The Plan should apply a 5% buffer (Bellway Homes Ltd (Essex) PSQ25-6360, PSQ25-6388, Hill Residential Ltd PS25-354, Strutt and Parker (Farms) Limited PSQ25-5519), a sufficient/higher buffer (Welbeck Strategic Land V Limited PSQ25-3210), a 20% buffer (Home Builders Federation PSQ25-5471, Wates Developments Limited PSQ25-5302, Richborough PS25-173)
- Identify additional residential allocations to ensure sufficiently flexibility and overcome any potential shortfall in projected delivery from strategic allocations. Amend Table 1 to show changes to the yields from the existing allocations and include a 20% buffer. The plan relies on garden communities that can be slow/fail as supported by 'Start to Finish' research by Lichfields. Identify additional residential allocations based on a more dispersed approach including within urban areas and existing sustainable settlements (Richborough PS25-170)
- The Plan is failing to plan for enough new homes. Concerns over the capacity and trajectory of Hammonds Farm. Allocate new development including in Great Leighs and Patching Hall Lane (Bellway Homes Ltd (Essex) PSQ25-6360, PSQ25-6388)
- Policy will exacerbate existing and increasing issues of unaffordability and may need to accommodate unmet needs from neighbouring authorities. Plan should promote delivery and wider benefits of the full CNEB including adding it to the Key Diagram. Plan should allocate additional sites to help fund it including land north of Wheelers Hill (Hallam Land Management PSQ25-6382)
- The plan focuses growth on the garden communities which require long lead in times and can stall – allocate a greater number of sites to help meet the higher Standard Method, provide flexibility and an appropriate buffer (Higgins Group PSQ25-5624)
- Chelmsford is likely to have an increased demand for housing because of new infrastructure developments. Some of Chelmsford's neighbours have significant unmet housing needs. It is unclear how such factors have been considered in determining the housing requirement (Tritton Farming Partnership LLP PSQ25-5672)

- The proposed housing requirement may not stay within 80% as dwelling stock estimates and affordability ratios change. Allocate more housing sites to increase the housing requirement (Gay Bowers Limited PS25-292) to achieve NPPF 2024 levels and increase the housing requirement and buffer. This is expected by recent Written Ministerial Statements (This Land Limited PSQ25-5755)
- Should be planning to meet 100% of the housing requirements and allocating more sites including in Danbury (Landvest Developments Ltd PSQ25-5789)
- Do not object to the quantum of new housing but given the 'built-in' shortfall in housing provision from the transitional arrangements the plan should remove areas from the Green Belt and allocate as safeguarded land for housing delivery after 2041 (Croudace Homes PSQ25-6043)
- The plan's housing requirement may not stay within 80% as dwelling stock estimates and affordability ratios change. Notwithstanding the transitional arrangements, the plan should maximise housing delivery opportunities. Allocate additional and smaller sites including West Chelmsford which are more flexible than larger strategic allocations (Crest Nicholson PSQ25-6076)
- More appropriate and sustainable options to SGS16a and b have been ruled out. The plan has not addressed our previous concerns and is unsound (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6133)
- Policy is not properly justified, effective or represent a positive approach to plan preparation, as other less harmful growth options have not been properly interrogated (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6133)

Review of the plan

- The Council should commit to an early/immediate review of the plan (Martin Grant Homes PSQ25-2609, PS25-147, Bloor Homes (Eastern) PSQ25-6141, Hallam Land Management PSQ25-6382, Crest Nicholson, Dandara Strategic Land, and Taylor Wimpey Strategic Land PS25-326, Higgins Homes PS25-347, Welbeck Strategic Land V Limited PSQ25-3210, Wates Developments Limited PSQ25-5302)

IIA comments

- The full standard method and/or a higher growth scenario needs to be tested in the IIA/plan (Martin Grant Homes PSQ25-2609, PS25-147, (Taylor Wimpey Strategic Land PS25-315, Higgins Homes PS25-347)
- The IIA needs updating to ensure all reasonable alternatives have been assessed (Welbeck Strategic Land V Limited PSQ25-3210)
- Support the IIA conclusion that the proposed housing requirement is an appropriate basis for plan-making in sustainability terms (Hammonds Farm) (Wates Developments and Hammonds Estates LLP PS25-310)
- It is unclear if the IIA has appropriately considered the higher growth option This appears to have been rejected because it results in an 'oversupply' of housing which conflicts with national policy (Crest Nicholson PSQ25-6076,

Crest Nicholson, Dandara Strategic Land, and Taylor Wimpey Strategic Land PS25-326)
- The IIA does not appear to have tested an option of extending existing employment areas (Saxtons 4x4 PSQ25-6094)

Employment Requirement

- Should test spatial options in the Green Belt and/or Green Wedge land to address full housing and employment needs including unmet neighbouring council needs (The Bucknell Family PS25-286)
- Plan does not plan for sufficient employment land, allocate sufficient employment sites or align with the evidence base or national policy. The Employment Land Review 2024 Update calculation of employment land requirement should be treated as a minimum (Gearston Ltd PSQ25-3045)
- Plan should commit to an early review to deliver the full objectively assessed housing needs and consequential employment growth requirements. Provide new employment space to match the future growth of the resident workforce in Chelmsford and to reflect the 2024 NPPF local housing need requirements. Consider redeveloping existing established employment sites, such as the BAE site (Rosehart Properties Ltd PSQ25-3182)
- Reliance on Scenario 1 in the Employment Land Reviews, despite a strong office and industrial demand, risks a mismatch between jobs and housing growth. Reassess site allocations and consider other sites including in the Green Wedge. Restricting land release could constrain sustainable growth and infrastructure deficits (Cliffords Group Ltd PSQ25-4958)
- Support for the Employment Land Reviews but demand for logistics development is likely understated so keep the employment quantum as a minimum. The Savills Industrial & Logistical Needs Assessment (March 2022) (submitted alongside the representation) considers amongst other matters there will be future demand from London and the supply of industrial and logistics has been suppressed (Pigeon (Sandon) Ltd PS25-228)
- The identified additional employment floorspace is insufficient to meet the identified needs of the logistics sector in accordance with national policy. There should objectively assess the requirements of the logistics sector across the sub-region. This is expected to increase requirements for logistic space in the plan. Concerns raised over the Employment Land Review including the assumed jobs density (Greystoke CB PSQ25-6084)
- Plan's employment policies are not fully justified. Allocate more employment land including around existing employment areas. Amend the Grey Belt/Green Belt to extend Robjohns Employment Area (Saxtons 4x4 PSQ25-6094)
- The scale of additional employment land provision has not been properly justified, represents a deviation from the Council's evidence base and are over-inflated as there is no overriding quantitative or qualitative need for the proposed employment floorspace of 162,646sqm and additional employment allocations SGS16a and b (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6133)
- The Employment Land Review shows that the City's employment land needs can be adequately met (with a buffer) by existing commitments / allocations over the plan period. SGS16a and b will result in significant adverse impacts

and do not represent the most sustainable growth option. The over-provision of new employment floorspace, which far exceeds historic levels of supply, could saturate the market and dilute demand. Any additional employment land should focus on smaller employment sites, in a range of locations across the City, and include sites within existing built-up areas, where there is already local infrastructure in place to support delivery (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6133)

Gypsy and Traveller and Travelling Showpeople Requirements

- Support approach to meeting identified needs for additional Gypsy, Traveller and Travelling Showpeople accommodation. Continued close and effective working on Gypsy and Traveller accommodation across Essex, through the Essex Planning Officers Association and other strategic planning groups is needed (Brentwood Borough Council PSQ25-6159, Rochford District Council PSQ25-6194)
- Concerns expressed with policy. Acknowledge the GTAA but it is unclear whether the demand for travelling showpeople in the adopted plan and Chelmsford Garden Community DFD has been met. Replacing travelling showpeople provision for gypsy and traveller provision within SGS6 could represent a shortfall in another type of specialist residential accommodation elsewhere (Vistry Group PSQ25-6374)
- Increase the identified unmet need for new permanent plots for Travelling Showpeople from 38 to 41 to reflect the updated GTAA and recent Public Inquiry granting temporary consent for 11 families for 3-years. Allocate land east of Main Road, Broomfield to help provide a 5-year supply of deliverable sites. Object to meeting identified unmet needs through windfalls in Policy DM3 as this is uncertain, and the policy requirements are unworkable (Mr D Bibby and Family and Colleagues PSQ25-6356, PSQ25-6359).

Small Sites Requirement

- Based on a total housing requirement of 22,990, 6.9% of new dwellings could be delivered on small sites - short of the 10% requirement. Self and custom build houses are not within the definition of small sites and small windfall sites cannot be relied upon. Allocate additional small sites including in Little Baddow, Great Leighs and West Hanningfield (Essex Alms Housing PS25-302, PS25-307, PS25-309)
- The plan is not meeting 10% of their housing requirement on small sites and windfall sites are uncertain. More small sites should be allocated including in East Hanningfield (Mr and Mrs B Hearn PS25-171)
- Council should seek to review the approach to small sites given the pressing need for housing and new NPPF targets. The Plan is over reliant on major strategic regeneration and at risk of falling short on housing delivery given past undersupply. Plan should allocate more smaller scale sites including in Boreham (Urban Provincial PSQ25-4972)

Other

- The current approach to defining sustainable locations for development based on settlement boundaries is overly reliant on arbitrary boundaries and a flexible greener outlook could be adopted i.e. walking distance to key services. This would ensure contribution on merit for deliverable well connected sustainable edge of settlement sites including Great Leighs (Mrs Helen Sadler PS25-28, PS25-30, PS25-63).

Para 6.20 and Strategic Policy S7 – The Spatial Strategy

Consultation point	Total number of responses
Para 6.20 and Strategic Policy S7 – The Spatial Strategy	92

Summary of Representations – main issues and requested changes:

- Support expressed for the settlement hierarchy, but it is unclear how it is intended to be used by decision-makers. Move the table to the reasoned justification text if it simply explains the distribution of growth, and increase the number of new homes to be delivered through alternative means – see the emerging West Suffolk Local Plan as an example (This Land Limited PSQ25-5759, Miscoe Enterprises Ltd PSQ25-2990, A.G. & P.W.H. Speakman PSQ25-3040, Weal Properties Ltd PSQ25-3072, Mrs R Armstrong and Mr B Howard Ms Becky Armstrong PSQ25-3077, Gearston Ltd PSQ25-3141, Cliffords Group Ltd, PSQ25-4966, The Bucknell Family, PS25-289, Crest Nicholson PSQ25-6079, Taylor Wimpey Strategic Land PS25-316, Pigeon (Sandon) Ltd PS25-230, Crest, Dandara, and Taylor Wimpey Strategic Land PS25-328)
- Support the settlement hierarchy and that Great Baddow is part of Chelmsford Urban Area (Hill Residential Ltd PS25-382)
- Support the identification of Galleywood as a Key Service Settlement (Croudace Homes PSQ25-6048)
- Chelmsford is worthy of its own separate classification in the Settlement Hierarchy (Dominus Chelmsford Limited PSQ25-6204, Higgins Homes PS25-364, Crest Nicholson PSQ25-6079, The Bucknell Family PS25-289, Taylor Wimpey Strategic Land PS25-316)
- If the settlement hierarchy remains in policy, reword to state that 'Development will be brought forward in accordance with the Spatial Strategy Development Locations and Allocations, as well as through development within and adjoining existing settlements and in sustainable locations along existing transport corridors having regard to other policies within this Plan and the NPPF, read as a whole.' (The Bucknell Family, PS25-289, Crest, Dandara, and Taylor Wimpey Strategic Land PS25-328)
- The settlement hierarchy is not a robust basis for identifying sustainable development locations. Amend to 'development at settlements outside the Green Belt, where this would support existing or new local services to meet the needs of that specific community' (Broomfield Parish Council PSQ25-5151)

- Settlement Hierarchy should remove the distinction in relation the Green Belt (Higgins Group PSQ25-5625, PSQ25-5631)
- Support expressed for the spatial strategy (Anglian Water Services Ltd PSQ25-6396)
- Support significant growth to North-East Chelmsford (Cliffords Group Ltd PSQ25-4966, Gearston Ltd PSQ25-3141, Halley Development PSQ25-3087, PSQ25-5045)
- Support expressed for the spatial strategy but need to consider the wider impacts of the planning growth on neighbouring authority areas, including Brentwood and Rochford Council. CCC should satisfy itself and a Planning Inspectorate that it has considered all reasonable options, including the Green Belt (Brentwood Borough Council PSQ25-6158, Rochford District Council PSQ25-6193)
- Broad support expressed for the spatial strategy which is supported by the plan evidence base including the IIA. Support SGS16a. Documentation submitted alongside our representations demonstrate that SGS16a is deliverable and that there are no fundamental barriers to bringing it forward. The plan is not unduly reliant on large scale garden community developments (SGS6 and 16a will deliver less than half of Chelmsford's total housing supply) and is supported by a wide range of sites at other scales (Wates Developments and Hammonds Estates LLP PS25-313)
- Support the principle of providing Gypsy and Traveller and Travelling Showpeople accommodation on large strategic development allocations, but the proposed site distribution is unfair and unbalanced between the garden communities. Amend this policy (and site allocation policies) to remove 13 Travelling Showpeople pitches from Site SGS16a and reinstate them at SGS6 as this site has sufficient land and access characteristics to accommodate them (Wates Developments and Hammonds Estates LLP PS25-313)
- The submitted Agricultural Land Classification survey and comparative appraisal show that for the Council to meet its development needs, the loss of BMV agricultural land is unavoidable, and that alternative sites to Hammonds Farm would have similar impacts (Wates Developments and Hammonds Estates LLP PS25-313, PS25-319)
- Support the spatial strategy for employment but question limiting employment uses to B2 and B8 of the Use Classes Order. Amend SGS15 to support development in Use Classes E(g)(i-ii), B2 and/or B8 (CJH Farming Ltd PS25-287)
- For clarity amend policy to confirm the numbers within the table are approximates and should not be treated as ceilings. Remove reference to all strategic growth sites requiring a masterplan and instead address on a site-by-site basis, in the relevant site-specific policies (CJH Farming Ltd PS25-287, Pigeon (Sandon) Ltd PS25-230)
- Support SGS16b (Pigeon (Sandon) Ltd PS25-230)
- Identify the further expansion of Chelmsford Garden Community now or for growth beyond the current plan period to boost housing supply, to help address any unmet needs from elsewhere and to help deliver the full CNEB (Hallam Land Management PSQ25-6375)

- Although the residential strategic growth sites will need to provide specialist housing this will unlikely meet needs in full, so additional allocations are needed (Mrs Mary Rance PSQ25-6498)
- Objections/concerns expressed to the spatial strategy. Examples of reasons put forward include that there has been a failure to test all reasonable alternative spatial options to support higher housing delivery and meet unmet needs from neighbouring areas; too much reliance on the delivery of strategic sites/large-scale garden communities; concerns with proposed allocated sites including their delivery rates, concerns around achieving/maintaining a 5-year supply of homes and, the need to support rural communities and provide an adequate supply buffer. Plan should allocate additional sites including within the Green Belt and/or Green Wedge, smaller-sites and in all/more settlements in the hierarchy (Hill Residential Ltd PSQ25-5194, Mrs R Armstrong and Mr B Howard Ms Becky Armstrong PSQ25-3077, Miscoe Enterprises Ltd PSQ25-2990, Cliffords Group Ltd PSQ25-3004, PSQ25-4966, Weal Properties Ltd PSQ25-3072, A.G. & P.W.H. Speakman PSQ25-3040, Martin Grant Homes PS25-148 and PSQ25-2615, M Scott Properties Ltd PSQ25-6023/6026, Tritton Farming Partnership LLP PSQ25-5679, PSQ25-5685, W. D. Smith & Son PSQ25-6019, This Land Limited PSQ25-5759, Obsidian PSQ25-5937, Richborough PS25-175, Dandara Eastern PSQ25-6213, Bloor Homes (Eastern) PSQ25-6142, Gladman Developments Ltd PSQ25-6314, Croudace Homes PS25-358)
- The Council has not adequately tested alternative options for growth, and it is unclear why other reasonable options have been discounted, including Northwest Chelmsford. Disagree with IIA assessment/rejection of West and Northwest Chelmsford which also scores better in the SHELAA. The Council has discounted all Green Belt sites as a matter of principle, although some could represent more sustainable options for development than SGS16a – a Green Belt Review is required. There is no overriding need for the additional employment allocations at SGS16a and b which will have significant adverse impacts – delete both from the plan (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6137)
- Allocate additional sites across a wider variety of sites sizes to replace or supplement the major strategic allocations. Alternatively, identify land as a 'reserve' site including in Rettendon (Croudace Homes PS25-358)
- There are enough sites for Chelmsford to meet the higher growth scenario, including in South Woodham Ferrers. Plan is overly reliant on SGS16a which is questionable based on the evidence base, planning logic and deliverability (Dandara Eastern PSQ25-6213)
- There should be higher housing growth for Danbury (Martin Grant Homes, PS25-148 and PSQ25-2615); proportionate to the new housing requirement (A.G. & P.W.H. Speakman PSQ25-3040)
- Follow a twinned approach to allocating sites in Neighbourhood Plan areas, whereby the Local Plan and the Neighbourhood Plan's allocate sites to ensure houses come forward to help meet local housing needs within the plan period (Richborough PS25-175)
- Delete requirement for a Gypsy and Traveller site at SGS6 – this is not properly evidenced, is contrary to the approved Development Framework Document (DFD) and could result in a shortfall is another type of specialist residential accommodation elsewhere (Chelmsford Garden Community

Consortium PSQ25-6339, PSQ25-6345, PSQ25-6354, Vistry Group PSQ25-6376)

- Concerns that the spatial strategy will not achieve at least 10% (2,229 homes) of its housing requirement on sites of less than one hectare in size (Home Builders Federation PSQ25-5473)
- Allocate more land to reinstate the previous housing supply buffer and meet housing requirements in full (Obsidian PSQ25-5937)
- Undertake a full Green Belt review and identify development in the Green Belt. Examples of reasons put forward include to meet housing needs in full, reduce reliance on the garden communities, provide an adequate housing supply buffer and provide a more even distribution of growth across the District (Rosehart Properties Ltd PSQ25-3189, M Scott Properties Ltd PSQ25-6023, PSQ25-6026, Taylor Wimpey Strategic Land PSQ25-5454, Obsidian PSQ25-5937, W. D. Smith & Son PSQ25-6019, Catesby Land and Planning PSQ25-5606, Higgins Group PSQ25-5625, PSQ25-5631, Vistry PS25-304, Barratt David Wilson – Eastern Counties (BDW) PSQ25-5783)
- Council needs to identify 'Grey Belt' sites and consider reasonable alternatives to meet the new standard method requirements and consequential employment growth (Rosehart Properties Ltd PSQ25-3189)
- Council needs to undertake a Green Wedge Review. Without this, the Green Wedge designation cannot be used to reject potential development sites (Mr J Bolingbroke PSQ25-5524)
- Strategic growth areas comprise 70% of the total housing supply and the allocated sites are not delivering as projected. Allocate more proportionate sites to provide some contingency including in Broomfield (Obsidian Strategic Asset Management Ltd PSQ25-5707)
- Number of dwellings for Danbury should be proportionally increased to reflect the need to plan for the Council's new housing requirements (Landvest Developments Ltd PSQ25-5794)
- The spatial strategy has not considered all opportunities to expand the Widford/Robjohns Employment Area Industrial Estate or far enough to provide economic space. The employment and sustainability policies are potentially incongruous. Amend the Green Wedge/Belt to extend Robjohns Employment Area (Saxtons 4x4 PSQ25-6099, PSQ25-6102)
- Policy should be clear that the housing figures are a minimum to be consistent with Strategic Policy 6 and para 61 of the NPPF (2024) to ensure the efficient use of allocated housing land (Vistry Group PS25-137)
- Support additional growth in line with the NPPF targets given the housing delivery targets fall short of the ambitions in the NPPF 2024 (Halley Development PSQ25-3087, PSQ25-5045)
- Add an additional table beneath the Growth Areas Tables to identify safeguarded land including in the Green Belt that could come forward after 2041 or where there is an early review to ensure a more balanced, equitable distribution of new housing and to meet future development needs (Croudace Homes PSQ25-6044, PSQ25-48).
- Allocate the Marriage Mill Cranham Road site as a new development/ employment allocation in S7 (W & H Marriage & Sons Limited PSQ25-6055)
- We need to be consulted for any works in the vicinity of the Exolum pipeline (map attached to representation) (Exolum Pipeline System Ltd PSQ25-480)

- The Strategic Housing Needs Assessment falls short of detailing how the market for co-living accommodate will be met. Allocate a co-living site in Chelmsford City Centre (Highgate Capital Limited PSQ25-5332)
- Amend policy to also focus new growth to accessible locations on the strategic road network to meet the needs of the logistics sector including land at Junction 17 A12. SGS16a and b are too small to meet the needs of the logistics sector (Greystoke PSQ25-6074)
- Changes to the strategic road network should consider potential impacts on the wider network including London's eastern corridor. To avoid reliance on A12 access into London, Growth Area 3 could explicitly refer to strategic connections to wider employment opportunities for Chelmsford's workforce who work in London. Expanded highways should provide improved infrastructure for sustainable modes such as bus lanes (Transport for London PSQ25-6500)
- The new housing figures appear speculative. Hammonds Farm is contrary to Strategic Priority 3 and other land should be released for housing, preferably inside the A12. Windfall sites should be allocated now if the Council is certain of them (J & T Wardrop and the Wardrop Trust PS25-107, PS25-108, PS25-109)
- Quantum allocated within the Chelmsford Urban Area is too low and the plan should be aiming for 4,000 new homes (Dominus Chelmsford Limited PSQ25-6204)
- The current approach to defining sustainable locations for development based on settlement boundaries is overly reliant on arbitrary boundaries and a flexible greener outlook could be adopted i.e. walking distance to key services. This would ensure contribution on merit for deliverable well connected sustainable edge of settlement sites including Great Leighs (Mrs Helen Sadler PS25-28, PS25-64, PS25-39, PS25-54, PS25-55, PS25-57)
- Settlement boundaries must be logical, easily identifiable and follow property boundaries, permanent features and encompass suitable undeveloped sites and historical use is acknowledged (Mrs Helen Sadler PS25-39, PS25-54, PS25-55, PS25-57).
- Chelmsford water recycling centre (WRC) has sufficient dry weather flow (DWF) headroom to accommodate the planned growth in and around the city (Anglian Water Services Ltd PSQ25-6396)
- The Water Cycle Study Stage 2 (WCS) has identified that the current consented Dry Weather Flow (DWF) will be exceeded at the SWF WRC (WRC) based on the proposed growth and that the current headroom is very limited. Before an application can be made to the Environment Agency (EA) to increase the DWF permit, significant modelling will be required. The Anglian Water PR24 Business Plan identifies a scheme at SWF WRC for AMP8 to enable growth to come forward (Anglian Water Services Ltd PSQ25-6396)
- There are some errors in WCS relating to Great Leighs WRC at para 6.7.1 and Table 6.7. The proposed allocations in Great Leighs catchment will require a DWF permit increase to be accommodated. Agree that development must not be delivered until there is sufficient capacity available at the WRC and this may require a suitable phasing plan to align with our future investment plans (Anglian Water Services Ltd PSQ25-6396)

- Engage Essex Police to ensure new infrastructure during construction and the final building stage are safe and secure and do not compromise Emergency Service Access (Essex Police PSQ25-2656)
- Support the settlement hierarchy, but allocate more growth to Bicknacre and test this as a reasonable alternative (Welbeck Strategic Land V Limited, PSQ25-3210, PSQ25-3215)
- Reject findings of the IIA including the conclusions of Option 2c and Option 3 in relation to land at West Chelmsford. Consider a potential spatial strategy with residential-led development at West Chelmsford along with employment development at Location 16b (not just Howe Green) and / or promoted sites as potential options (Crest, Dandara, and Taylor Wimpey Strategic Land PS25-328)
- Rejection of West Chelmsford in the IIA is not justified. Should assess an option based on smaller sites in West Chelmsford coming forward individually (Crest Nicholson PSQ25-6079) The Bucknell Family PS25-289, Taylor Wimpey Strategic Land PS25-316)
- Reasons for rejecting Option 2b in the IIA and the SHELAA conclusions have failed to have regard to our previously submitted technical evidence. The plan fails to provide a robust housing need and supply that addresses duty to cooperate requirements (Strutt and Parker (Farms) Limited PSQ25-5512, PSQ25-5520)
- SGS16a is not justified in favour of other options in West of Chelmsford. The reasons for rejecting this spatial option in the IIA are disputed including connectivity to the Chelmsford's urban area (Dandara PSQ25-6016, PSQ25-6017)
- Reasons for rejecting strategic growth at Chatham Green in the IIA are not applicable to Land East of Chatham Green e.g. isolated from the strategic highway network and limited capacity at the wastewater recycling facilities serving the area (Tritton Farming Partnership LLP PSQ25-5679, PSQ25-5685)
- The IIA must test growth in Boreham as a reasonable alternative and allocate development here. Reasons include because it is a Key Service Settlement and in proximity to other strategic development (Wates Developments Limited PSQ25-5303, PSQ25-5304, PSQ25-5313, This Land Limited PSQ25-5759, Gearston Ltd PSQ25-3141, Urban Provincial PSQ25-4975, Gladman Developments Ltd PSQ25-6314, Gladman Developments Ltd PSQ25-6314)
- The emerging Boreham Neighbourhood Plan infers that any future development will need to be to the east of the settlement (Wates Developments Limited PSQ25-5313)
- There is no evidence to support a lack of local education capacity as a key issue facing development in Boreham (Urban Provincial, PSQ25-4975)
- Development at Rettendon, Howe Green and East Hanningfield collectively has never been tested through the IIA (Gladman Developments Ltd PSQ25-6314
- Discounting a 'high growth' scenario based only on consideration of one selection of sites is unjustified. Other sites could be tested as a 'high growth' as a reasonable alternative to the spatial strategy (Martin Grant Homes PSQ25-2615)

- Need to explain why the viability assessment supporting the SHELAA (Part 5 of 9) makes different cost assumptions to those set out in 2023 viability assessment (Home Builders Federation PSQ25-5473)
- Amend para 6.26 to refer to healthcare 'provision with some additional provision for emergency services to meet mandated/target response times.' (East of England Ambulance Service NHS Trust PSQ25-5241)
- Para 6.27 - exclude reference to the Green Belt and allow growth in Green Belt Service Settlements to help housing affordability, increase flexibility in housing supply and support rural sustainability (M Scott Properties Ltd PSQ25-6025)
- Sandford Mill - support policy and the opportunity for a mixed-use development incorporating leisure in conjunction with use of the Chelmer & Blackwater Navigation. This should include the provision of Navigation mooring, launching and dry dock facilities in a marina basin re-purposing the Settled Water Tanks together with re-use of the heritage Filter House, and a Visitor Centre for the new Country Parks (Essex Waterways Ltd PSQ25-5207)
- Sandford Mill – the vehicular access to the Manor Farm development is from the A414 and should be extended to Sandford Mill. The road capacity from the north will be unsuitable for the vehicles expected to use the proposed new facilities and this should be reflected throughout the plan (Chelmsford Rivers and Canal Link group (CRACL) PS25-277)
- ARU Writtle - support SPA6 in principle but object to any future expansion being dependent on an approved masterplan – delete such a reference from para 6.55 (ARU PSQ25-6219)
- Refusal to undertaking a Green Belt Review and rushing through a flawed Local Plan under the Transitional Arrangements will result in a skewed and unsustainable growth strategy that fails to meet housing needs in full and an over-reliance on large Garden Communities that will take significant time and infrastructure to deliver.
- Concerns over why the proposed warehouse development at Howe Green has been considered
- Alternative strategies and new/expanded site allocations promoted by landowners/developers
- Various site promoters question the SHELAA assessment of their sites.

Strategic Policy S8 – Delivering Economic Growth

Consultation point	**Total number of responses**
Strategic Policy S8 – Delivering Economic Growth	6

Summary of Representations – main issues and requested changes:

- Support policy and the priority to use previously developed land in sustainable locations and to focus on locations well-served by active and sustainable travel modes and existing or planned public transport provision. Allocate the former BAE site which is considered Grey Belt land (Rosehart Properties Ltd PSQ25-5301)

- Support in general but propose that the Cranham Road site be allocated as a rural employment area, or as an extension to Drakes Lane Employment Policy or as a Special Policy Area. The site has extant planning permission for employment development and will contribute towards the local economy (W & H Marriage & Sons Limited PSQ25-6059)
- Support expressed for policy but amend to identify logistics as one of the sectors that the new Local Plan will seek to nurture and grow (Pigeon (Sandon) Ltd PS25-232)
- Amend policy to include reference to nurturing and growing the logistics sector and to state that other employment will be acceptable in other locations beyond the allocations if there is a demonstrable unmet need arising during plan period (Greystoke, PSQ25-6074)
- Amend the 6th bullet point to include south of Chelmsford to be consistent with the spatial strategy and to meet the required increase in logistics space (Greystoke PSQ25-6074)
- Correct para 6.61 to refer to the Planning 'Obligations' SPD and to delete the date of the ECC Developers Guide as this will change over the life of the plan (Essex County Council, PS25-203)
- Plan has not properly considered all opportunities including an extension to Robjohns Employment Area or go far enough to provide key economic space in sustainable locations. Alter the Green Wedge/Belt to enlarge Robjohns Employment Area (Saxtons 4x4 PSQ25-6102).

Strategic Policy S16 – Connectivity and Travel

Consultation point	**Total number of responses**
Strategic Policy S16 – Connectivity and Travel	10

Summary of Representations – main issues and requested changes:

- Support for the policy as it would accord with Sport England's Uniting the Movement Strategy and Active Design Guidance (Sport England PS25-81)
- Support for the commitment to creating high quality, sustainable places which promote connectivity for all, especially that all new cycle and walking routes are designed to be safe and secure, and do not promote the fear of crime (Essex Police PSQ25-2661)
- Supportive of sustainable communities promoting a modal shift to active and sustainable modes of transport (Daniel James Developments PSQ25-3057)
- Significant cross-boundary engagement has been undertaken through-out the preparation of the Local Plan, effectively addressing the requirements of Duty to Co-operate. Would emphasise the importance of ongoing and meaningful collaboration between the local authorities in helping to address aspects across all identified strategic priorities, particularly in the context of infrastructure (Brentwood Borough Council PSQ25-6161, Rochford District Council PSQ25-6196)
- Broadly supportive of the policy and the wider sustainable travel strategy but emphasise the importance of ensuring the impacts of growth on sustainable

transport networks are carefully considered and mitigated. This will require positive and constructive engagement between Councils to consider how transformational changes to travel patterns, and area wide modal shift, can be successfully delivered through a joined-up and strategic approach (Brentwood Borough Council PSQ25-6161, Rochford District Council PSQ25-6196)

- Improvements to active travel within Chelmsford City boundaries are considered beyond the Chelmsford's own LCWIP, which focuses largely on the urban area of Chelmsford. It should be recognised that the boundaries of Chelmsford's administrative area extend far beyond the city itself, and that active travel has a place for both intra- and inter-borough journeys. Alignment with ECC's County-wide LCWIP proposals and emerging proposals in neighbouring districts and boroughs should be sought and opportunities for joint working pursued (Brentwood Borough Council PSQ25-6161, Rochford District Council PSQ25-6196)
- Policy should recognise that due to the specific locational needs of the logistics sector, as outlined in PPG, the walkable neighbourhood principles may not always be achievable. The policy should be revised to state that walkable neighbourhood principles within developments area should be achieved where appropriate (Greystoke CB PSQ25-6083)
- There is no evidence supplied to justify why it is considered that a 1,000 sqm non-residential development can reasonably secure the commitments of paragraph d) of policy S16, whilst this is only considered necessary for a far more substantial 100 dwelling development (i.e. ten times the scale of the major development definition). It should be increased to 10,000 sqm (Anglia Ruskin University PSQ25-6215)
- Part A requires caveats as to the extent of its applicability, by reference to scale/type of application and relevance to the scheme proposed (Vistry Group PS25-139)
- The wording "prioritise and maximise" should be deleted, as these provide unreasonable and inappropriate requirements for new development, and are not appropriate terms for use in development management policies (Vistry Group PS25-139)
- The requirement in Part B for new development to achieve a "significant" shift in mode share is imprecise. The scale of shift required will depend on the transportation impacts of the proposed development in question and is a matter to be determined in that context (Vistry Group PS25-139).

Strategic Policy S9 – Infrastructure Requirements

Consultation point	**Total number of responses**
Strategic Policy S9 – Infrastructure Requirements	38

Summary of Representations – main issues and requested changes:

General

- Supports requirement for new development to be supported by infrastructure improvements which align with ECC Developers' Guide to Infrastructure Contributions (Essex County Council PS25-213)
- Support the policy and that development must be supported by the provision of infrastructure, services and facilities that are "identified as necessary to serve its needs (Wates Developments and Hammonds Estates LLP PS25-321)
- Supports this overarching policy which ensures the delivery of all necessary supporting infrastructure (Croudace Homes PSQ25-6045)
- Supports the policy and references to utilities infrastructure, flood risk management and green infrastructure which align with our strategic priorities and future investments in the Council's administrative area (Anglian Water Services Ltd PSQ25-6397)
- Support this policy and satisfied that wastewater treatment capacity and local water environment will be protected by the plan policies (Environment Agency PSQ25-6267)
- Support for plan policies which seek to promote, active and sustainable travel and specifically the promotion of Chart (National Highways PSQ25-6446)
- Allocations close to/adjacent to our network may need to consider noise/air quality issues. Noise barriers or bunds are not allowed on the highway network. Consider suitable noise mitigation solutions during the early stages of design to achieve better outcomes. Recommend a specific policy which identifies how air quality and noise impacts would be monitored and managed and what interventions may be required (National Highways PSQ25-6446)
- As this policy is read in conjunction with Strategic Policy S10, re-instate the wording related to ensuring that the cumulative impact of planning policy, standards and infrastructure requirements do not render development in the Local Plan unviable/undeliverable (Dominus Chelmsford Limited PSQ25-6205)

Transport and Highways

- The infrastructure requirements are evidenced and provide an appropriate basis for determining the likely infrastructure improvements to the local and strategic road network (Wates Developments and Hammonds Estates LLP PS25-322)
- Support para 6.91 requiring more detailed analysis of traffic impacts and mitigation options testing as part of future planning applications (Wates Developments and Hammonds Estates LLP PS25-322)
- Overall, support the plan proposals. Request that the additional Park and Ride site for West Chelmsford is located outside the Green Belt (Writtle Parish Council PSQ25-455)
- Support expressed for the policy. It is important that infrastructure items listed are deliverable and viable (Tritton Farming Partnership LLP PSQ25-5681, PSQ25-5693)
- The latest highway modelling report shows that SGS16a and b have a direct impact on the capacity of A12 Junctions 18 and 19. The developers of these sites will be required to identify and deliver the necessary junction capacity improvements alongside provision of sustainable and active mode infrastructure and services (Essex County Council PS25-208)

- The need for appropriate public transport should be taken into consideration and new road crossings installed at an early stage of the development (Chelmsford Garden Community Council PSQ25-4951)
- Recognise the considerable projects which support active travel in Chelmsford (Transport for London PSQ25-5922)
- Para 6.90 - amend third sentence to clarify that sustainable travel is encouraged from both garden communities (Essex County Council PS25-207)
- Para 6.98 – delete reference to the Army and Navy Sustainable Transport Package approval to avoid confusion with the three applications approvals (Essex County Council PS25-209)
- Para 6.99 – amend to reflect the latest position including the approval of the Army and Navy junction and expansion to Sandon and Chelmer Valley Park and Ride planning applications by ECC (Essex County Council PS25-210)
- Para 6.100 - amend the Route Based Strategy reference so that the strategies for Mid Essex are the focus and that their latest position is clear (Essex County Council PS25-211)
- Although well developed, the National Highways A12 Junction 19 Chelmsford to J25 Marks Farm improvement scheme is not guaranteed to be delivered due to the uncertain political environment. Therefore, a Local Plan traffic modelling scenario was required where the scheme is either delayed or doesn't go ahead at all. The Local Plan traffic modelling has identified a number of locations on the Strategic Road Network which would come under pressure from increased traffic flows. Namely Junctions 17,18 and 19 on the A12. National Highways previously recommended these locations need a more detailed assessment to understand the scale and nature of the impacts, ideally using a micro simulation model and if necessary suitable mitigation measures found to manage the impact on the junctions and the A12. Third party microsimulation modelling work commenced in 2024 in consultation with National Highways, Essex Highways and CCC. National Highways agreed the base model including methodology and baseline data inputs and have since received the future scenario model (including traffic associated with the Chelmsford Local Plan). We are optimistic that a lot of the issues raised will be resolved before the Examination and would like to continue working closely with CCC with the aim of resolving these issues. As part of this work, we will work to develop a greater understanding of the impact of the proposed development upon the A12 and the required mitigation which should go into the IDP (National Highways PSQ25-6446)
- The allocations in the Local Plan will increase the number of residents in proximity of the Strategic Road Network (SRN), in particular site 16a. It is likely that these locations will be impacted by noise pollution from the SRN and raise the potential for exceedances of air quality standards for which extraordinary measures in the form of permeant speed restriction may need to be considered. This could help with flow and may be required as this section of the A12 reaches capacity (National Highways PSQ25-6446)
- Several polices in the proposed Local Plan set out requirements for developments to reduce the impact on or improve local air quality that does not directly relate to the Strategic Road Network and what mitigation may be required. National Highways will continue to work proactively with CCC on these matters but would recommend a specific policy which identifies how air

quality and noise impacts would be monitored and managed and what interventions may be required (National Highways PSQ25-6446)

- Welcome consideration of a dedicated lorry parking facility ideally close to the strategic road network, or alternatively, a policy requiring adequate lorry parking and lay over facilities at proposed employment sites and roadside service facilities (a study is attached to the representation) (National Highways PSQ25-6446)
- Due to the critical nature of the proposed future infrastructure schemes, engagement with Essex Police is strongly advocated to ensure crime has been designed out and impacts upon emergency services minimised (Essex Police PSQ25-2662)
- Para 6.96 refers to Department for Transport/Major Road Network funding combined with potential developer contributions which is assumed will be through planning obligations. Need to ensure sufficient and timely development relating to Sections 1 and 2 of the CNEB. It is understood that without a complete CNEB, delivery of existing allocations (including Chelmsford Garden Community) could result in the A131 being over capacity (Tritton Farming Partnership LLP PSQ25-5681 and PSQ25-5693)
- Changes to the strategic road network should consider potential impacts on the wider network including London's eastern corridor. To avoid reliance on A12 access into London, Growth Area 3 could explicitly refer to strategic connections to wider employment opportunities for Chelmsford's workforce who work in London. Expanded highways should provide improved infrastructure for sustainable modes such as bus lanes (Transport for London PSQ25-5922)
- Explore further growth options in North Chelmsford to help deliver the CNEB including land around Chatham Green and Great Leighs (Tritton Farming Partnership LLP PSQ25-5681)
- There should be no further development within this parish until the CNEB has been completed or the impact on the existing road system will be overwhelming (Chelmsford Garden Community Council PSQ25-4951)
- Concerned about impacts on the road infrastructure around Maldon and Heybridge as reported in the IIA. Whilst there are no decisions on growth options in our emerging Local Plan, some scenarios include the potential for growth in larger villages like Heybridge (Maldon District Council PSQ25-4938)
- Identify further expansion of Chelmsford Garden Community now or for beyond the current plan period to provide additional funding towards the full CNEB, (Hallam Land Management PSQ25-6383)
- Suggests a wording change to the tenth bullet in relation to capacity improvement on the A132 corridor (Vistry Group PSQ25-6378).

Flood Risk Management

- Support the provision of a new lock and weir gates at Chelmer Waterside (Chelmsford Rivers and Canal Link group PS25-278) which will assist with flood risk and open up the rivers for increased recreational use (Essex Waterways Ltd PSQ25-5208)
- Consider surface water drainage needs early in the design process to ensure the most appropriate solution is found (National Highways PSQ25-6446)

- Do not support a new lock and weir gates at Chelmer Waterside which will impact the viability and deliverability of the Meadows allocation (Dominus Chelmsford Limited PSQ25-6205)
- The policy and IDP is being compromised by not reviewing Green Belt. Development near Writtle could reduce the risk of flooding by providing natural flood management interventions to slow the flow of the River Wid upstream of the City Centre (Vistry Group PS25-298).

Community Facilities

- Support the provision of serviced moorings along the River Chelmer which will enable recreational vessels to visit the City Centre and residents to enjoy the waterways (Essex Waterways Ltd PSQ25-5208)
- Support policy which refers to sport, leisure and recreational facilities. This supports the strategic priorities and is consistent with national policy (Sport England PS25-82)
- Supports the delivery of essential healthcare infrastructure in line with housing growth. Health infrastructure should be at the forefront of priorities for infrastructure delivery. Health providers should have flexibility in determining the most appropriate means of meeting healthcare needs from new development. The NHS and its partners will need to work with CCC in forming appropriate mitigation measures (NHS Property Services Ltd PSQ25-5597, PSQ25-5594)
- Sporting and recreational provision should be made in new developments in accordance with local needs (Chelmsford Garden Community Council PSQ25-4951)
- Bullet one should include a reference to SEND provision in line with ECC's Developers' Guide to Infrastructure Contributions (Essex County Council PS25-205)
- Para 6.79 – Add references to the Fire & Rescue Service and Essex Police for consistency (Essex County Fire and Rescue Service PSQ25-6101, Essex Police PSQ25-6126)
- Allotment deficits exist in north and east Chelmsford and at South Woodham Ferrers. Sites need a range of services/facilities including secure site fencing, good accessibility, wide enough access roads, car parking, raised beds, toilets and secure site hut (Princes Road Allotment Association PS25-47)
- Local schools are oversubscribed and there is inadequate health provision. Adequate services should be provided at an early opportunity in future developments (Chelmsford Garden Community Council PSQ25-4951)
- Challenges the requirement for developers to provide the land and pay the full cost of construction of education infrastructure (Vistry Group PSQ25-6378)
- Concern that there will not be a new doctor's surgery, medical centre or hospital despite all the schools, nurseries, housing and business parks to be built.

Green Infrastructure and Natural Environment

- Supports policy which includes multi-functional green infrastructure. This supports the strategic priorities and is consistent with national policy (Sport England PS25-82)

- Para 6.84 – Welcomes the possible need for additional recreational mitigation measures to address 'alone' impacts of new development. Suggests the policy text is amended to reference other measures outlined in any future iterations of the RAMS (Natural England PSQ25-6243).

Utilities

- Amend policy to refer to gigabit speed broadband (Essex County Council PS25-205)
- Currently there are no known new infrastructure interactions within the area (National Grid Electricity Transmission PSQ25-6238).

Strategic Policy S10 – Securing Infrastructure and Impact Mitigation

Consultation point	Total number of responses
Strategic Policy S10 – Securing Infrastructure and Impact Mitigation	17

Summary of Representations – main issues and requested changes:

- Support expressed for policy (Essex County Council PS25-213, NHS Property Services Ltd PSQ25-5600)
- Support requirements for developments to demonstrate sufficient capacity for wastewater treatment and disposal. Applicants have the right to connect to the public network regardless of capacity constraints, so we rely on the planning system to ensure proposed development is managed effectively (Anglian Water Services Ltd PSQ25-6398)
- Pleased with policy wording on water quality and satisfied that wastewater treatment capacity and local water environment will be protected (Environment Agency PSQ25-6268)
- Support policy but include a specific reference to the Chelmsford Flood Resilience Partnership Project (CFRPP) as the Strategic Flood Risk Assessment (SFRA) makes clear that financial contributions will be expected for this scheme from relevant strategic sites (Environment Agency PSQ25-6268)
- Acknowledges that new development will increase demands on physical and social infrastructure and advises contact is made with the Essex Police to minimise impact upon policing (Essex Police PSQ25-2663)
- Cross reference to Strategic Policy S9 and clarify what developers are expected to contribute towards, and the amounts required and/or the means of calculating them including which sites are expected to deliver which infrastructure and how contributions across all allocations/developments will be proportioned (Croudace Homes PSQ25-6046)
- Re-instate wording around ensuring that the cumulative impact of planning policy, standards and infrastructure requirements do not render the sites and development identified in the Local Plan unviable and therefore undeliverable (Dominus Chelmsford Limited PSQ25-6205)

- Regards infrastructure planning obligations, consider how much growth is directed to locations that relate to such infrastructure, and whether growth is sufficient to fund it (Triton Farming Partnership LLP PSQ25-5683)
- Amend second para to remove the requirement for future infrastructure to be provided solely from proposed development. This is unreasonable as infrastructure planned by a 3rd party could mitigate the development and Grampian conditions could prevent the development occurring until the 3rd party infrastructure was in place (Vistry Strategic Land PS25-136)
- Review the final para to ensure that the Local Plan viability assessment is not inadvertently used to fetter application stage assessment as there will always be site-specific instances where a whole plan viability exercise is not representative of true site costs. Concerns also raised to the Local Plan viability evidence base (Vistry Strategic Land PS25-136)
- ECC has assisted with the preparation of the plan evidence base which covers all main subject areas and seeks to align with the NPPF. Wish to agree the updated IDP prior to submission (Essex County Council PS25-213)
- Broadly support policy. Suggest additional wording to para 6.107 to state that the Council will have regard to the inherent scale and complexity and infrastructure needs of the Garden Communities when assessing the requirements for planning obligations and CIL and that consideration will be given to ringfencing CIL or the use of other bespoke infrastructure mechanisms to help fund infrastructure required to support their delivery. This will align with the draft Planning Obligations SPD, the Community Infrastructure Levy Governance Allocating and Spending CIL (March 2024) and PPG (Wates Developments and Hammonds Estates LLP S25-324)
- Amend para 6.104 to include fire and rescue facilities (East of England Ambulance Service NHS Trust PSQ25-5239) and to 'Essex Police, Essex County Fire & Rescue Service and the East of England Ambulance service NHS Trust' instead of 'emergency services' (Essex County Fire and Rescue Service PSQ25-6103, Essex Police PSQ25-6127)
- Amend para 6.105 to include 'fire and rescue, police and ambulance services' instead of 'emergency services' (Essex Police PSQ25-6218, PSQ25-6128, Essex County Fire and Rescue Service PSQ25-6104)
- Notes that the IIA refers to the need to upgrade the Water Treatment Works at SWF and that a large Call for Site nearby could form part of Maldon's strategic site allocations, subject to further assessment work (Maldon District Council PSQ25-4937)
- Overall agree with the plan but seek assurance that the 25% CIL funding to the Parish Council will remain a commitment (Writtle Parish Council PSQ25-462)
- Identify the further expansion of Chelmsford Garden Community (SGS6) now or for growth beyond the current plan period to provide additional developer funding to help deliver the full CNEB (Hallam Land Management PSQ25-6384)
- Alternative strategies and new/expanded site allocations promoted by landowners/developers.

<u>Strategic Policy S11 – The Role of the Countryside</u>

Consultation point	Total number of responses
Strategic Policy S11 – The Role of the Countryside	19

Summary of Representations – main issues and requested changes:

- Support policy (Writtle Parish Council PSQ25-452)
- Support the policy's strategic aims (Elteam PSQ25-5457)
- Broadly supports Part B, but expand the wording to acknowledge that development will be supported where land or buildings do not perform strongly against the Green Wedge, and comply with other relevant plan policies (Cliffords Group Ltd PSQ25-3010)
- Part A needs modifying to reflect the new NPPF (J & T Wardrop and the Wardrop Trust PS25-111)
- Concerns about effectiveness of Part A considering the 2024 NPPF. The plan should be positive on Green Belt development and set out criteria as to how residential development in sustainable locations can come forward to maintain the vitality and viability Chelmsford's communities (Higgins PSQ25-5626)
- Questions the need for a specific Green Wedge policy as less restrictive planning policies can protect the open countryside. Undertake a Green Wedge Review to allow growth in sustainable locations which protect Green Wedge purposes including in Broomfield (Obsidian Strategic Asset Management Ltd PSQ25-5711)
- Unclear if developments within the Green Wedge (Part B) are also assessed against the Rural Area (Part C) (Mr D Bibby and Family and Colleagues PSQ25-6359)
- Requirements for developments to have no adverse impact is too restrictive as Traveller and Travelling Showpeople developments are likely to have an adverse impact on the rural area but can be permitted under Policy DM3. Insert "unacceptable" before "adverse impact" (Mr D Bibby and Family and Colleagues PSQ25-6359)
- Policy should be more flexible and permissive to allow sustainable development to come forward outside of defined built-up areas to address housing land supply shortfalls. See example in Ashford Local Plan 2030 (Gladman Developments Ltd PSQ25-6315)
- There appear no proposals to revise the 'Green Wedges and Green Corridors: Defining Chelmsford's River Valleys 2017' study. Service Settlements must be provided with housing provision to meet village needs (Mr Paul Hopkins PSQ25-6390)
- Amend the Green Wedge/Belt to extend Robjohns Employment Area. This site has limited value in the openness of the Green Belt, is inconsistent with the Green Wedge criteria and conflicts with Policy DM4 (Saxtons 4x4 PSQ25-6106)
- Exceptional circumstances exist to undertake a Green Belt review and to allocate sites in sustainable locations which comply with the overall Growth Strategy. Development in the Green Belt should be tested via public consultation and the IIA (Martin Grant Homes PS25-149)

- Amend the policy to align with the latest Green/Grey Belt national planning policy and guidance. This will avoid confusion for decision makers and help to meet Government ambitions to increase housing delivery. There may be Grey Belt sites including land in Galleywood (BDW Eastern Counties PSQ25-6030)
- Council should undertake a Green Belt review to help identify further for housing to help housing affordability, increase flexibility in housing supply and support rural sustainability (M Scott Properties Ltd PSQ25-6024)
- Undertake a full Green Belt review and identify development in the Green Belt to provide a more even distribution of growth and maintain the vitality of Green Belt settlements. Release Grey Belt land at Battlesbridge (W. D. Smith & Son PSQ25-6019
- It is inevitable that housing land supply will need to be increased. Amend the Great Baddow Green Belt/settlement boundary to allocate Grey Belt development opportunities (Newell Properties Development Ltd PSQ25-5049)
- Para 6.121 – for clarity and to strengthen the plan, add a new second sentence to read: 'New development will be required to have regard to the Essex Green Infrastructure Strategy (2020) and the Essex Green Infrastructure Standards' (Essex County Council PS25-214)
- Future development should consider and protect rural landscapes and character and the impact upon drainage and SuDS (Chelmsford Garden Community Council PSQ25-4960)
- The current approach to the DSB is overly reliant on arbitrary boundaries which does not feature in the NPPF. Rather than stifling growth in a Key Service Settlement, a flexible, sustainable outlook could be adopted. This would enable contribution on merit for deliverable well connected sustainable sites including in Great Leighs (Mrs Helen Sadler PS25-49, PS25-50, PS25-51)
- Alternative strategies and new/expanded site allocations promoted by landowners/developers.

Strategic Policy S12 – Role of City, Town and Neighbourhood Centres

Consultation point	**Total number of responses**
Strategic Policy S12 – Role of City, Town and Neighbourhood Centres	0

No main issues

Strategic Policy S17 – Future of Chelmsford City Centre

Consultation point	**Total number of responses**
Strategic Policy S17 – Future of Chelmsford City Centre	5

Summary of Representations – main issues and requested changes:

- Strong support for Section E Waterways (Chelmsford Rivers and Canal Link group PS25-279)
- Support the proposals to provide significant improvements to the environmental quality, attractiveness and recreational potential of the waterways and their associated spaces. The Meadows re-development must capitalise on the waterside location to support the Council's policies for the waterways in the City (Essex Waterways Ltd PSQ25-5209)
- It is imperative that crime has been considered a material consideration throughout the design process for town centre regeneration schemes, including the potential impact on operational policing of the night-time economy, ASB opportunities, and minimise the chances for crime and the fear of crime to occur, along with the draft Terrorism (Protection of Premises) Bill (Essex Police PSQ25-2664)
- Support the policy and the approach to use development proposals to support a sustainable and vibrant City Centre, but the effectiveness of this Policy is being compromised by the Council decision not to review its Green Belt boundaries when preparing the Local Plan Review (Vistry Group PS25-300)
- Text relating to small scale reconfiguration of units at The Meadows should be removed (Dominus Chelmsford Limited PSQ25-6486).

Strategic Policy S13 – Monitoring and Review

Consultation point	**Total number of responses**
Strategic Policy S13 – Monitoring and Review	17

- Policy should commit to submit the new plan within two years of adoption and have clear mechanisms to ensure the review will lead to meaningful policy changes (Miscoe Enterprises Ltd PSQ25-2991, Cliffords Group Ltd PSQ25-3016, Cliffords Group Ltd and Mr Mark Peters PSQ25-6503, A.G. & P.W.H. Speakman PSQ25-3043, Daniel James Developments PSQ25-5162, The Bucknell Family PS25-291)
- The submitted plan will conflict with para 231 of the 2024 NPPF for decision-making, so the review process should commence once the current plan is submitted for examination (Rosehart Properties Ltd and Bressole Ltd PSQ25-3193)
- The policy should commit the Council to an immediate update of the plan (Higgins Group PSQ25-5627, Vistry Group PS25-299) and to submit for examination within two years of this plan being adopted (Barratt David Wilson – Eastern Counties (BDW) PSQ25-6029). Policy should commit to the next plan meeting housing needs in full – see policy in the Bedford Local Plan 2030 as an example (Home Builders Federation PSQ25-5474)
- Amend policy to state that if a new plan fails to materialise in two years, that the policies relating to housing supply will be considered out of date (Miscoe Enterprises Ltd PSQ25-2991, Cliffords Group Ltd PSQ25-3016, A.G. & P.W.H. Speakman PSQ25-3043, Daniel James Developments PSQ25-516, Home Builders Federation PSQ25-5474, Barratt David Wilson – Eastern Counties (BDW) PSQ25-6029)

- The policy should commit to an immediate review and to meeting identified need in full. The review should be completed within the three years of adoption (Bloor Homes (Eastern) PSQ25-6146) and meet the full standard method need given the shortfall in the transitional Pre-Submission plan (Martin Grant Homes PS25-151)
- Support a review of the Local Plan within two years of adoption although this is at odds with an unjustified housing requirement. Provide greater certainty around timescales for a review like that in the Bedford Plan 2030 (Gladman Developments Ltd PSQ25-6316)
- Alternative strategies and new/expanded site allocations promoted by landowners/developers.

Where Will Development Growth be Focused?

This section of the consultation document provides the site policies for delivering the Spatial Strategy.

Section 7 – Where Will Development Growth be Focused? and Growth Area 1 – Central and Urban Chelmsford (Paragraphs 7.1 to 7.12 and Figure 16)

Consultation point	Total number of responses
Section 7 - Where Will Development Growth be Focused? and Growth Area 1 – Central and Urban Chelmsford (Paragraphs 7.1 to 7.11 and Figure 16)	9

Summary of Representations – main issues and requested changes:

- Support for Growth Area 1, and the protection of existing Anglian Water assets on relevant sites (Anglian Water Services Ltd PSQ25-6399)
- Support the significant role that central and urban Chelmsford take in the overall development strategy (Gladman Developments Ltd PS25-150)
- Suggest adding reference to fire and rescue to the list of infrastructure in para 7.1 (Essex County Fire and Rescue Service PSQ25-6107)
- This refers to unlocking access to Sandford Mill Special Policy Area, but this appears to have been omitted from Site Policy 3a (Essex Waterways Ltd PSQ25-5210)
- The current approach to defining sustainable locations for development based on settlement boundaries is overly reliant on arbitrary boundaries and a flexible greener outlook could be adopted i.e. walking distance to key services (Mrs Helen Sadler PS25-52)
- Further sites should be allocated to meet the needs of the district, identified through a Green Belt review – including a promoted site at Galleywood Road, Great Baddow (Taylor Wimpey Strategic Land PSQ25-5448), a promoted site at Smithers Drive, Great Baddow (Martin Grant Homes PS25-150)

- Sustainable sites within the Green Belt should be safeguarded to meet future development needs, through a Green Belt review (Croudace Homes PSQ25-6048)
- Amend site infrastructure requirements related to education for all Strategic and Growth Site Policies (excluding SGS 6, 10 and 16a) to: 'Financial contributions to primary, secondary, early years education and childcare as required by the Local Education Authority.' (Essex County Council PS25-184).

Strategic Growth Site Policy 1a - Chelmer Waterside

Key statistics:

Consultation point	Total number of responses
Strategic Growth Site Policy 1a - Chelmer Waterside	4

Summary of Representations – main issues and requested changes:

- Support the policy which will assist in realising the fuller amenity and recreational potential of the waterway, flood prevention, and habitats (Essex Waterways Ltd PSQ25-5211)
- Residential travel plans could also reference connectivity to London via rail (Transport for London PSQ25-5915)
- New residential development will need to rely on existing public open space, but some assessment should made to ensure these can meet the GI Standards, as well as information leaflets for new residents (Natural England PSQ25-6245)
- Land remediation should be a requirement rather than an expectation. The list of infrastructure needs should include specific reference to financial contributions for flood risk management infrastructure (Environment Agency PSQ25-6277).

Strategic Growth Site Policy 1w – Meadows Shopping Centre and Meadows Surface Car Park

Consultation point	Total number of responses
Strategic Growth Site Policy 1w – Meadows Shopping Centre and Meadows Surface Car Park	9

Summary of Representations – main issues and requested changes:

- The proposed bridges should provide navigational headroom to support navigation on the City's rivers (Essex Waterways Ltd PSQ25-5212, Chelmsford Rivers and Canal Link group PS25-280)

- Welcome the supporting heritage evidence to support this site allocation, and the heritage criteria, within the policy, for the mitigation measures which should be followed to protect and enhance the historic environment (Historic England PSQ25-5802)
- Support from a charity which would like to become involved with providing community and educational opportunities within the new development (Independence Project PSQ25-6035)
- Additional reference should be made to optimising development and raising the allocation figure to better reflect the current planning position (Dominus Chelmsford Limited PSQ25-6198)
- New residential development will need to reply on existing public open space, but some assessment should made to ensure these can meet the GI Standards, as well as information leaflets for new residents (Natural England PSQ25-6246)
- The list of infrastructure needs should include specific reference to financial contributions for flood risk management infrastructure (Environment Agency PSQ25-6286).

Strategic Growth Site Policy 1b – Former St Peter's College, Fox Crescent

Consultation point	**Total number of responses**
Strategic Growth Site Policy 1b – Former St Peter's College, Fox Crescent	2

Summary of Representations – main issues and requested changes:

- The former playing pitches on the site have not been used for 14 years, the open space designation has been removed from the map and the text at para 7.45 should be deleted to reflect this and provide consistency (Essex Housing PSQ25-5548)
- Support the requirement to provide or make financial contributions to new or enhanced sport, leisure and recreation facilities and a commuted sum in lieu of the loss of the former school playing fields. Should refer to the Council's new Playing Pitch Strategy (2025) which confirms playing pitches should be protected or replaced even if they are disused or poor quality and identifies clear deficiencies which would support upholding the requirements of the policy (Sport England PS25-83).

Strategic Growth Site Policy 1d – Riverside Ice and Leisure Land, Victoria Road

Consultation point	**Total number of responses**
Strategic Growth Site Policy 1d – Riverside Ice and Leisure Land, Victoria Road	4

Summary of Representations – main issues and requested changes:

- Support for the policy, particularly relating to improvement of Mallard Bridge which has inadequate pedestrian/cycle width and restricted headroom for recreational use, and to provision of new lock and weir gates for flood protection and navigational benefits (Essex Waterways Ltd PSQ25-5214, Chelmsford Rivers and Canal Link group PS25-285)
- The list of infrastructure needs should include specific reference to financial contributions for flood risk management infrastructure (Environment Agency PSQ25-6283).
- Works to Mallard Bridge need to take consideration of existing river users, and of nearby nesting swans (Chelmsford Canoe Club PS25-250).

Strategic Growth Site Policy 1e – Civic Centre Land, Fairfield Road

Consultation point	Total number of responses
Strategic Growth Site Policy 1e – Civic Centre Land, Fairfield Road	5

Summary of Representations – main issues and requested changes:

- Support for references to safe and convenient pedestrian and cycle connections which ECC plans to improve in this area (Essex County Council PS25-216)
- Suggest adding reference to fire and rescue facilities in the list of infrastructure requirements (Essex County Fire and Rescue Service PSQ25-6108, PSQ25-6114); and to ambulance services (Essex Police PSQ25-6129, PSQ25-6130).

Strategic Growth Site Policy 1f – Eastwood House Car Park, Glebe Road

Key statistics:

Consultation point	Total number of responses
Strategic Growth Site Policy 1f – Eastwood House Car Park, Glebe Road	1

Summary of Representations – main issues and requested changes:

- Recommends stronger wording to ensure development is required to deliver a remediation strategy, rather than just expected to (Environment Agency PSQ25-6279).

Strategic Growth Site Policy 1y – Land Between Hoffmanns Way and Brook Street (Marriages Mill)

Consultation point	Total number of responses
Strategic Growth Site Policy 1y – Land Between Hoffmanns Way and Brook Street (Marriages Mill)	3

Summary of Representations – main issues and requested changes:

- Support the inclusion of the heritage criteria (Historic England PSQ25-5805)
- The allocation is supported, but a higher density of housing would be appropriate for this sustainable town centre location, previous work indicates around 250/300 dwellings and commercial uses can be accommodated so the number should be increased (W & H Marriage & Sons Ltd PSQ25-6061)
- Recommends stronger wording to ensure developments are required to deliver a remediation strategy, rather than just expected to Environment Agency PSQ25-6287).

Strategic Growth Site Policy 1cc – Andrews Place, Land West of Rainsford Lane

Consultation point	Total number of responses
Strategic Growth Site Policy 1cc – Andrews Place, Land West of Rainsford Lane	3

Summary of Representations – main issues and requested changes:

- There is no justification for excluding market housing, which may impact on the ability to deliver affordable housing on site – alternative wording suggested (CHP PSQ25-2974)
- The list of infrastructure needs should include specific reference to financial contributions for flood risk management infrastructure (Environment Agency PSQ25-6288)
- Do not object to principal of redevelopment – however concerns expressed as a long-standing local resident as follows: by replacing 60 dwellings with 240 properties, mainly as flats, there is the potential to exacerbate the already high levels of crime in this area including drugs and violence; parking provision is considerably less than required impacting on other local roads where there are no parking restrictions in place.

Policy GR1 – Growth Sites in Chelmsford City Centre/Urban Area

Key statistics:

Consultation point	Total number of responses

Policy GR1 – Growth sites in Chelmsford City Centre/Urban Area	2

Summary of Representations – main issues and requested changes:

- The eastern part of the former Key-Metzeler premises (Brook Street/New Street) should remain as a currently designated Employment Area use but re-designation of the western part of the site in line with its former draft site allocation (previously SGS1x in the Preferred Options Consultation Document, now removed) for residential use would be desirable to enable additional residential growth in a sustainable city centre location (HEVF Self Storage UK Limited PSQ25-6336).

Growth Site Policy 1g – Chelmsford Social Club, Springfield Road

Key statistics:

Consultation point	**Total number of responses**
Growth Site Policy 1g – Chelmsford Social Club, Springfield Road	2

Summary of Representations – main issues and requested changes:

- Support for the policy, particularly enhanced route links and the improvement of Mallard Bridge which has inadequate pedestrian/cycle width and restricted headroom for recreational use (Essex Waterways Ltd PSQ25-5215)
- Support for funding for the Mallard Bridge, which should be at navigation height, and replacement lock and weir (Chelmsford Rivers and Canal Link group PS25-284).

Growth Site Policy 1h – Ashby House Car Parks, New Street

Consultation point	**Total number of responses**
Growth Site Policy 1h – Ashby House Car Parks, New Street	0

Summary of Representations – main issues and requested changes:

- No main issues

Growth Site Policy 1i – Rectory Lane Car Park West

Consultation point	**Total number of responses**

Growth Site Policy 1i – Rectory Lane Car Park West	1

Summary of Representations – main issues and requested changes:

- In reconfiguring the car park, consideration should be given to using existing spaces to accommodate bus laybys to help ease safety issues along Broomfield Road with regards pupils accessing Chelmsford County High School for Girls (Essex County Council PS25-217).

Growth Site Policy 1z – Granary Car Park, Victoria Road

Consultation point	**Total number of responses**
Growth Site Policy 1z – Granary Car park, Victoria Road	2

Summary of Representations – main issues and requested changes:

- Support the inclusion of the heritage criteria (Historic England PSQ25-5806)
- There is an opportunity for a greater number of homes and a density of 90dph, which should be explicitly supported in the policy, and it is premature to reduce to 50 from 60 in the Preferred Options plan (Sempra Homes PSQ25-3107).

Growth Site Policy 1k – Former Chelmsford Electrical and Car Wash, Brook Street

Consultation point	**Total number of responses**
Growth Site Policy 1k – Former Chelmsford Electrical and Car Wash, Brook Street	0

Summary of Representations – main issues and requested changes:

- No main issues

Growth Site Policy 1aa – Coval Lane Car Park

Consultation point	**Total number of responses**
Growth Site Policy 1aa – Coval Lane Car Park	1

Summary of Representations – main issues and requested changes:

- Support the inclusion of the heritage criteria (Historic England PSQ25-5808).

Growth Site Policy 1l – BT Telephone Exchange, Cottage Place

Consultation point	Total number of responses
Growth Site Policy 1l – BT Telephone Exchange, Cottage Place	0

Summary of Representations – main issues and requested changes:

- No main issues

Growth Site Policy 1m – Rectory Lane Car Park East

Consultation point	Total number of responses
Growth Site Policy 1m – Rectory Lane Car Park East	0

Summary of Representations – main issues and requested changes:

- No main issues

Growth Site Policy 1n – Waterhouse Lane Depot and Nursery

Consultation point	Total number of responses
Growth Site Policy 1n – Waterhouse Lane Depot and Nursery	0

Summary of Representations – main issues and requested changes:

- No main issues

Growth Site Policy 1p – British Legion, New London Road

Consultation point	Total number of responses
Growth Site Policy 1p – British Legion, New London Road	0

Summary of Representations – main issues and requested changes:

- No main issues

Growth Site Policy 1q – Land rear of 17-37 Beach's Drive

Consultation point	Total number of responses
Growth Site Policy 1q – Land rear of 17-37 Beach's Drive	0

Summary of Representations – main issues and requested changes:

- No main issues

Growth Site Policy 1r – Garage Site, St Nazaire Road

Consultation point	Total number of responses
Growth Site Policy 1r – Garage Site, St Nazaire Road	0

Summary of Representations – main issues and requested changes:

- No main issues

Growth Site Policy 1bb – Glebe Road Car Park

Consultation point	Total number of responses
Growth Site Policy 1bb – Glebe Road Car Park	2

Summary of Representations – main issues and requested changes:

- Suggest additional detail for clarity relating to materials and screening to secure a well-informed approach to placemaking and the historic environment (Historic England PSQ25-5809)
- Concern at a loss of public parking, particularly overnight parking for nearby residents and visitors, also privacy and noise concerns from new properties overlooking existing gardens on Townfield Street.

Growth Site Policy 1s – Garage Site and Land, Medway Close

Consultation point	Total number of responses
Growth Site Policy 1s – Garage Site and Land, Medway Close	0

Summary of Representations – main issues and requested changes:

- No main issues

Growth Site Policy 1t – Car Park r/o Bellamy Court, Broomfield Road

Consultation point	Total number of responses
Growth Site Policy 1t –Car Park r/o Bellamy Court, Broomfield Road	0

Summary of Representations – main issues and requested changes:

- No main issues

Growth Site Policy 1v – Railway Sidings, Brook Street

Consultation point	Total number of responses
Growth Site Policy 1v – Railway Sidings, Brook Street	0

Summary of Representations – main issues and requested changes:

- No main issues

Location 2 – West Chelmsford

Strategic Growth Site Policy 2 – West Chelmsford

Consultation point	Total number of responses
Strategic Growth Site Policy 2 – West Chelmsford	6

Summary of Representations – main issues and requested changes:

- Welcome reference to the masterplanning principle to provide or make financial contributions to new or enhanced sport, leisure and recreational facilities as justified by the Council's emerging evidence base, other plan polices and NPPF (Sport England PS25-84)
- Overall agreement with the proposed proposals. Welcome the commitment to CIL funding and to the Writtle Neighbourhood Plan helping to shape the development (Writtle Parish Council PSQ25-457)
- No objection to the policy but expand site allocation to the south and north-east. Question how the SHELAA has informed the selection/rejection of sites, and it needs to reflect available information/evidence and opportunities to mitigate potential constraints identified. The IIA should assess sites in their own right and West Chelmsford as a growth location. Unclear how the proposed additional benefits of the promoted developments have been

considered (Taylor Wimpey Strategic Land PS25-318, Crest Nicholson PSQ25-6082)
- Concerns about adverse of the development on Roxwell Parish including no apparent provision to create additional health services and increased traffic and road safety on the A1060. Adjust the plan to provide additional primary healthcare facilities and to extend the 40mph speed limit beyond Boyton Hall to the junction with Vicarage Road (Roxwell Parish Council PSQ25-5824)
- Expand para 7.120 to include the following: 'A safe traffic free environment around school pedestrian entrances must be provided, ensuring access for emergency vehicles only' (Essex County Council PS25-220).

Location 3 – East Chelmsford

Strategic Growth Site Policy 3a – East of Chelmsford, Manor Farm

Consultation point	**Total number of responses**
Strategic Growth Site Policy 3a – East of Chelmsford, Manor Farm	8

Summary of Representations – main issues and requested changes:

- Welcome the mitigation measures to address cumulative recreational pressure on the SSSIs but impacts on coastal sites will need to be considered. Clarification on the name of SSSIs provided (Natural England PSQ25-6247)
- Welcome the requirement for financial contributions and masterplanning principle for providing new or enhanced sport, leisure, recreation and community uses (Sport England PS25-85)
- Object to the change to this policy which now omits the requirement for a vehicular access to Sandford Mill, only requiring pedestrian/cycle access. New vehicular access from the A414 is essential to provide adequate HGV service access for its proposed use as a Visitor Centre with marina facilities in conjunction with the Chelmer & Blackwater Navigation. The existing northern access is restricted by two II listed Navigation bridges which are unsuitable for HGVs and coaches (Essex Waterways Ltd PSQ25-5217, Chelmsford Rivers and Canal Link group PS25-281)
- The policy should be reviewed to clarify that financial contributions will only be required where it can be demonstrated that they meet the requirements of the CIL Regulations (Hopkins Homes PS25-199)
- The position relating to the need for a Minerals Resource Assessment (MRA) should be reviewed against exemptions in the Minerals Local Plan (MLP) (Appendix 5) which is not addressed (Hopkins Homes PS25-199)
- The decision to include Manor Farm was only possible after part of the farm was removed from Green Wedge status
- Concerns that toxic waste from Baden Powell Close is burning its way towards the river, which regularly floods

- Questions how the Local Plan allocation is consistent with Sandon and Little Baddow Neighbourhood Plans.

Strategic Growth Site Policy 3b – East of Chelmsford, Land North of Maldon Road (Employment)

Consultation point	Total number of responses
Strategic Growth Site Policy 3b – East of Chelmsford, Land North of Maldon Road (Employment)	4

Summary of Representations – main issues and requested changes:

- Support for the policy (Barratt Redrow PSQ25-5166)
- Support for additional wording relating to a strategy for responding to National Grid Electricity Transmission plc (NGET) overhead transmission lines (National Grid Electricity Transmission PSQ25-6235)
- Support for the policy, in particular safeguarded bus access which is demonstrated to be feasible (Wates Developments and Hammonds Estates LLP PS25-305)
- Propose that the allocation be reduced to approximately 40,000 sqm with associated parking, to provide more flexibility in layout and access to take account of overhead power lines (The Speakman Family PSQ25-6328)

Strategic Growth Site Policy 3c – East of Chelmsford, Land South of Maldon Road

Consultation point	Total number of responses
Strategic Growth Site Policy 3c – East of Chelmsford, Land South of Maldon Road	3

Summary of Representations – main issues and requested changes:

- Support for the policy (Barratt Redrow PSQ25-5167)
- Welcome the mitigation measures to address cumulative recreational pressure on the SSSIs but impacts on coastal sites will need to be considered. Clarification on SSSI names provided (Natural England PSQ25-6248)
- It has become increasingly difficult to address the ever-increasing infrastructure requirements being sought by Essex County Council Highways. It should not then have ‘catch all’ criteria as well, which could allow them to add further infrastructure. Suggest the first and fourth bullet points under ‘Site infrastructure requirements’ should be deleted (Barratt Redrow PSQ25-5167)
- Two additional requirements relating to recreational pressure on the SSSIs are unwarranted, given the Country Park at Site 3a and open space already proposed for this site, and should be deleted (Barratt Redrow PSQ25-5167)

- The site can be designed around above ground electricity lines, so the policy should be amended to allow flexibility for not moving these underground (Barratt Redrow PSQ25-5167)
- Other nearby sites (in Mayes Lane) are available and suitable for allocation and would contribute to meeting housing needs (J & T Wardrop and the Wardrop Trust PS25-111).

Strategic Growth Site Policy 3d – East of Chelmsford, North of Maldon Road

Consultation point	**Total number of responses**
Strategic Growth Site Policy 3d – East of Chelmsford, North of Maldon Road	1

Summary of Representations – main issues and requested changes:

- Support for the policy (Barratt Redrow PSQ25-5167)
- Two additional requirements relating to recreational pressure on the SSSIs are unwarranted, given the Country Park at Site 3a and open space already proposed for this site, and should be deleted (Barratt Redrow PSQ25-5167)
- The site can be designed around above ground electricity lines, so the policy should be amended to allow flexibility for not moving these underground (Barratt Redrow PSQ25-5168).

Location 4 – Growth Site Policy 4 – Land North of Galleywood Reservoir

Consultation point	**Total number of responses**
Growth Site Policy 4 – Land North of Galleywood Reservoir	1

Summary of Representations – main issues and requested changes:

- A promoted site in Galleywood should be allocated to help meet specialist residential accommodation needs (J & T Wardrop and the Wardrop Trust PS25-112).

Location 5 – Growth Site Policy 5 – Land Surrounding Telephone Exchange, Ongar Road, Writtle

Consultation point	**Total number of responses**
Growth Site Policy 5 – Land Surrounding Telephone Exchange, Ongar Road, Writtle	4

Summary of Representations – main issues and requested changes:

- Overall, the Parish Council agrees with this allocation and welcome the commitment to 25% of CIL being payable to the Parish Council through its made Neighbourhood Plan (Writtle Parish Council PSQ25-458)
- Support the allocation but would prefer the development amount to be expressed as a minimum or to be indicative (Telereal Securitised Property GP Limited PSQ25-4986)
- Any on-site infrastructure provision and/or financial contributions must be 'appropriate and proportionate' to the scale of the development. Insert such wording in each bullet requiring financial contributions. This will also align with Growth Site policies such as 3a and 3c (Telereal Securitised Property GP Limited PSQ25-4986).

Growth Area 2 – North Chelmsford (paragraphs 7.207-7.212 and Figure 17)

Consultation point	**Total number of responses**
Growth Area 2 – North Chelmsford (paragraphs 7.207-7.212 and Figure 17)	3

Summary of Representations – main issues and requested changes:

- Welcome the ambition to increase active and public transport, however the language could be firmer. Introduce maximum parking standards in areas close to stations and explicitly reference improved access to London (Transport for London PSQ25-5919)
- Support the Council's recognition of the strategic importance of North East Chelmsford and the Chelmsford Garden Community in accommodating significant levels of growth across the plan period (Daniel James Developments PSQ25-3060, PSQ25-6485)
- The suitability of Boreham for development has been overlooked as a reasonable alternative to Hammonds Farm and it must be noted that the strategic sites included within the adopted plan are yet to deliver (Gladman Developments Ltd PSQ25-6318).

Location 6 – North East Chelmsford (Chelmsford Garden Community)

Strategic Growth Site Policy 6 – North East Chelmsford (Chelmsford Garden Community)

Key statistics:

Consultation point	**Total number of responses**
Strategic Growth Site Policy 6 – North East Chelmsford Garden Community	21

Summary of Representations – main issues and requested changes:

- Support policy requirements for pedestrian, cycleway and bridleways; open space, sport, leisure and recreation facilities; community space and a new Country Park (Sport England PS25-86)
- Support opportunities for dual use sports facilities as justified by the Council's new sports evidence base, Government policy and other plan policies (Sport England PS25-86)
- Welcome reference to encouraging healthy and active lifestyles in line with the Active Design guidance in para 7.223 (Sport England PS25-86)
- Note changes to S4, S9 and DM16 which will address the requirement for this development to provide suitable alternative natural greenspace to provide mitigation in part for increased recreational impacts on international coastal designated sites under Essex Coast RAMS (Natural England, PSQ25-6249)
- Support for the site/policy (Daniel James Developments PSQ25-3064, Halley Development PSQ25-5041)
- We are committed to delivering CGC, but concerns are raised in relation to the assumptions in the Regulation 19 Viability Note (Chelmsford Garden Community Consortium PSQ25-6339, PSQ25-6354, Vistry Group PSQ25-6362)
- Revise policy to state the development proposals will be informed rather than accord with the DFD as it is not subject to examination (Halley Development PSQ25-5041, Ptarmigan Chelmsford A Limited PSQ25-5574)
- Amend policy to state a 'minimum' of 681 homes beyond 2024 to ensure consistency with the NPPF (Ptarmigan Chelmsford A Limited PSQ25-5574)
- Expand policy requirement to also provide safe and convenient connections to the Park and Ride to ensure consistency with the NPPF (Ptarmigan Chelmsford A Limited PSQ25-5574)
- Amend policy requirement to provide 'up to' 56,946sqm of dedicated employment land (Chelmsford Garden Community Consortium PSQ25-6339, PSQ25-6354, Vistry Group PSQ25-6362)
- Amend policy requirement and para 7.239 to provide a minimum of 10% BNG per phase with an aspiration of 20% across the site subject to site constraints and 'viability', to ensure accordance with the approved DFD (Chelmsford Garden Community Consortium PSQ25-6339, PSQ25-6354, Vistry Group PSQ25-6362, PSQ25-6363)
- Delete requirement for a Gypsy and Traveller site as this is not properly evidenced and could result in a shortfall is another type of specialist residential accommodation elsewhere (Chelmsford Garden Community Consortium PSQ25-6339, PSQ25-6345, PSQ25-6354, Vistry Group PSQ25-6362, PSQ25-6368)
- Amend policy and para 7.223 to provide 'up to' four new stand-alone early years and childcare nurseries 'within the village centres' (Chelmsford Garden Community Consortium, PSQ25-6339, PSQ25-6346, PSQ25-6354, Vistry Group PSQ25-6362)
- Amend requirement and para 7.229 to enable a 60% modal share 'within the development' (Chelmsford Garden Community Consortium PSQ25-6339, PSQ25-6354, Vistry Group PSQ25-6362)

- Delete requirement for the new all-through school to be on 'suitable' land (Chelmsford Garden Community Consortium PSQ25-6339/6354, Vistry Group PSQ25-6362, PSQ25-6369)
- Amend requirement to state that financial contributions towards delivery of Section 1a of the Chelmsford North East Bypass will be 'in the form of HIF Recovery and Recycling payments subject to viability testing' (Chelmsford Garden Community Consortium PSQ25-6339, PSQ25-6354, Vistry Group PSQ25-6362)
- Amend para 7.221 to provide a Travelling Showpeople site for 10 pitches based on 0.2 hectares per plot with convenient access for heavy goods vehicles. Delete requirement for a 10 pitch Gypsy and Traveller site with delivery through a Registered Housing Provider (Chelmsford Garden Community Consortium PSQ25-633, PSQ25-6354, Vistry Group PSQ25-6362)
- Add an additional bullet under 'Site infrastructure requirements' in line with the ECC Developers' Guide to read: Financial contributions to primary, secondary, early years and childcare, including SEND education as required by the Local Education Authority (Essex County Council PS25-222)
- Amend para 7.225 to delete the reference to a joint use agreement being 'secured' through the outline planning application or its s106 agreement. Replace instead with wording that alludes to the preparation of a Joint Use Agreement between the City Council and the school provider once appointed (Essex County Council PS25-223)
- Reinstate 13 Travelling Showpeople plots to this site (from the Preferred Option Plan) and delete from SGS16a. The transfer to SGS16a is unjustified and does not distribute needs appropriately across the district. It will also be challenging to accommodate at SGS16a in tandem with the proposed Gypsy and Traveller provision. Chelmsford Garden Community can adequately accommodate the plots as part of the mix of uses on the largest of the Garden Community sites (Wates Developments and Hammonds Estates LLP PS25-306)
- The trajectory for the site is unrealistic and not justified by evidence. Allocate additional housing close to Chelmsford to address a c2,000 shortfall in housing delivery over the plan period (Hill Residential Ltd PSQ25-5195)
- Land south of Pratts Farm Lane within the site is suitable new sports and leisure facilities (Cliffords Group Ltd PSQ25-3031)
- Expand site to incorporate land to the north and south of Peverel's Farm or amend policy to enable sites along Domsey Lane to come forward as stand-alone developments (Daniel James Developments PSQ25-3064)
- Expand site to incorporate land north of Wheelers Hill (or as a potential area for longer term growth beyond the Plan period) to boost housing supply, address affordability issues and unmet needs of neighbouring areas, and help deliver the full Chelmsford North East Bypass (Hallam Land Management PSQ25-6385)
- Expand site to incorporate land north of Cranham Road to boost housing land supply. Remove/reduce the number of dwellings allocated at SGS16a and redistribute the growth to North Chelmsford (Higgins Homes, PS25-365
- Essex Police have engaged with the design teams at the early design stage, for Chelmsford Community Garden (Essex Police PSQ25-2666).

Location 7 – Great Leighs

Strategic Growth Site Policy 7a – Great Leighs – Land at Moulsham Hall

Consultation point	Total number of responses
Strategic Growth Site Policy 7a – Great Leighs – Land at Moulsham Hall	10

Summary of Representations – main issues and requested changes:

- Support requirements for developments to demonstrate sufficient capacity for wastewater treatment and disposal to serve the site. Agree with recommendations in the Stage 2 Water Cycle Study 2024 that development may require a suitable phasing plan to align with our future investment plans (Anglian Water Services Ltd PSQ25-6400)
- Welcome reference to the masterplanning principle to provide or make financial contributions to new or enhanced sport, leisure and recreational facilities as justified by the Council's emerging evidence base, other plan polices and NPPF (Sport England PS25-87)
- Note changes to Strategic Policies 4 and 9 and DM16 which will address the requirement for this development to provide suitable alternative natural greenspace to provide mitigation in part for increased recreational impacts on international coastal designated sites under Essex Coast RAMS (Natural England PSQ25-6250)
- Site falls within the Eastern 2 Wide Area Multilateration Network statutory safeguarding zone meaning any development or change of use will trigger statutory consultation with us to assess impacts on the local air traffic management system. Usually this will be by virtue of the scale or height of a development, for example, developments 50m above ground level (Defence Infrastructure Organisation (DIO) PSQ25-6408)
- Add a policy requirement to protect the ecological integrity of Phyllis Currie Nature Reserve, and to provide funds to improve the resilience of the site to increased recreational impacts (Essex Wildlife Trust PSQ25-5060)
- Amend para 7.256 to clarify that Great Leighs primary school is full in most but not every year group and the scale of development in this location will 'likely' require a new primary school (Essex County Council PS25-224)
- Expand para 7.255 to include 'A safe traffic free environment around school pedestrian entrances must be provided, ensuring access for emergency vehicles only.' This will assist in this being considered at the earliest stage of the planning process and accord with Essex County Council's Developers' Guide to Infrastructure Contributions (Essex County Council PS25-225)
- Suggests amending para 7.265 by removing the text "Although this is not a barrier to new development growth", as current capacity and future permit requirements are constraints that will require alternative solutions to be investigated and considered in terms of their feasibility and deliverability. Also add 'subject to the necessary environmental permitting processes' to the end of the paragraph (Anglian Water Services Ltd PSQ25-6403)

- Objects to the plan – combined housing growth from the Chelmsford and Braintree Local Plans is too much and will put add extra traffic on an overburdened/unsuitable local road system. A supermarket and Senior School are required at Great Leighs together with a road for all traffic across the Braintree Site BLAN114 from Bakers Lane to Notley Road, to avoid the pinch points on Bakers Lane and the problems at the War Memorial Junction at Church Road/Witham Road Black Notley (Black Notley Parish Council PSQ25-481)
- Expand SGS7a to incorporate land to at School Lane (Harris Strategic Land Limited PSQ25-6038).

Strategic Growth Site Policy 7b – Great Leighs – Land East of London Road

Consultation point	**Total number of responses**
Strategic Growth Site Policy 7b – Great Leighs – Land East of London Road	4

Summary of Representations – main issues and requested changes:

- Support requirements for developments to demonstrate sufficient capacity for wastewater treatment and disposal to serve the site. Agree with recommendations in the Stage 2 Water Cycle Study 2024 that development may require a suitable phasing plan to align with our future investment plans (Anglian Water Services Ltd PSQ25-6401)
- Suggests amending para 7.280 by removing the text “Although this is not a barrier to new development growth”, as current capacity and future permit requirements are constraints that will require alternative solutions to be investigated and considered in terms of their feasibility and deliverability. Also add ‘subject to o the necessary environmental permitting processes’ to the end of the last paragraph (Anglian Water Services Ltd PSQ25-6404)
- Note changes to Strategic Policies 4 and 9 and DM16 which will address the requirement for this development to provide suitable alternative natural greenspace to provide mitigation in part for increased recreational impacts on international coastal designated sites under Essex Coast RAMS (Natural England PSQ25-6251)
- Objects to the plan – combined housing growth from the Chelmsford and Braintree Local Plans is too much and will put add extra traffic on an overburdened/unsuitable local road system. A supermarket and Senior School are required at Great Leighs together with a road for all traffic across the Braintree Site BLAN114 from Bakers Lane to Notley Road, to avoid the pinch points on Bakers Lane and the problems at the War Memorial Junction at Church Road/Witham Road Black Notley (Black Notley Parish Council PSQ25-482).

Strategic Growth Site Policy 7c – Great Leighs – Land North and South of Banters Lane

Consultation point	Total number of responses
Strategic Growth Site Policy 7c – Great Leighs – Land North and South of Banters Lane	7

Summary of Representations – main issues and requested changes:

- Support requirements for developments to demonstrate sufficient capacity for wastewater treatment and disposal to serve the site. Agree with recommendations in the Stage 2 Water Cycle Study 2024 that development may require a suitable phasing plan to align with our future investment plans (Anglian Water Services Ltd PSQ25-6400)
- Note changes to Strategic Policies 4 and 9 and DM16 which will address the requirement for this development to provide suitable alternative natural greenspace to provide mitigation in part for increased recreational impacts on international coastal designated sites under Essex Coast RAMS (Natural England PSQ25-6250)
- Amend para 7.285 to clarify that the scale of development in this location will 'likely' require a new primary school and that size has not yet been determined (Essex County Council PS25-226)
- Suggests amending para 7.294 by removing the text "Although this is not a barrier to new development growth", as current capacity and future permit requirements are constraints that will require alternative solutions to be investigated and considered in terms of their feasibility and deliverability. Also add 'subject to o the necessary environmental permitting processes' to the end of the last paragraph (Anglian Water Services Ltd PSQ25-6405)
- Add a policy requirement to protect the ecological integrity of Sandylay and Moat Woods Nature Reserve, and to provide funds to improve the resilience of the site to increased recreational impacts (Essex Wildlife Trust PSQ25-5061)
- Objects to the plan – combined housing growth from the Chelmsford and Braintree Local Plans is too much and will put add extra traffic on an overburdened/unsuitable local road system. A supermarket and Senior School are required at Great Leighs together with a road for all traffic across the Braintree Site BLAN114 from Bakers Lane to Notley Road, to avoid the pinch points on Bakers Lane and the problems at the War Memorial Junction at Church Road/Witham Road Black Notley (Black Notley Parish Council PSQ25-483)
- The current approach to defining sustainable locations for development based on settlement boundaries is overly reliant on arbitrary boundaries and a flexible greener outlook could be adopted i.e. walking distance to key services. This would ensure contribution on merit for deliverable well connected sustainable edge of settlement sites including Great Leighs (Mrs Helen Sadler PS25-28, PS25-53).

<u>Location 8 – Strategic Growth Site Policy 8 – North of Broomfield</u>

Key statistics:

Consultation point	Total number of responses
Strategic Growth Site Policy 8 – North of Broomfield	1

Summary of Representations – main issues and requested changes:

- Welcome the requirements for new or enhanced sport, leisure and recreational facilities and masterplanning principle to provide a coherent network of public open space, formal and informal sport, recreation and community space within the site. This approach is consistent with Government policy (Sport England PS25-88).

Location 9 – Growth Site Policy 9a – Waltham Road Employment Area

Consultation point	Total number of responses
Growth Site Policy 9a – Waltham Road Employment Area	17

Summary of Representations – main issues and requested changes:

- Support the allocation which is a logical extension to the existing established employment area. It is in a sustainable location and can significantly contribute to employment provision (J Group and Landvest PS25-351)
- The use of 'around' 3,500sqm is supported but considered an underestimation of the allocation's potential (J Group and Landvest PS25-351)
- The site could be expanded to include further land to the north, expanding the allocation to 3.5ha could deliver approximately 14,000sqm of employment floorspace (J Group and Landvest PS25-351)
- Support in principle but request the plan identifies Marriage Mill, Cranham Road as a new employment area (W & H Marriage & Sons Limited PSQ25-6060)
- The site falls within the Eastern 2 Wide Area Multilateration Network statutory safeguarding zone meaning any development or change of use will trigger statutory consultation with us to assess impacts the local air traffic management system. Usually this will be by virtue of the scale or height of a development, for example, developments 50m above ground level (Defence Infrastructure Organisation (DIO) PSQ25-6409)
- Object to the site expansion. The proposal does not address the likely increase and impacts of traffic on Waltham Road from other proposals and projects around Boreham or the safety risk to other road users on narrow country lanes. National Highway's Junction Assessment Report predicts that the by 2042 the junction of Waltham Road with the B1137 will be overcapacity at peak hours regardless of the A12 widening scheme. There are already large delays when the A12 is congested and the B1137 is a Designated Emergency Diversion Route from the A12 (Boreham Parish Council PSQ25-3149)

- Traffic, especially slow-moving commercial traffic exiting the site would delay emergency vehicle responses and the site is not well served by public transport (Boreham Parish Council PSQ25-3149)
- Concerns it would generate additional traffic movements including HGV traffic through Boreham (already approaching capacity) on top of those already proposed due to the A12 widening scheme and the closure of Junction 20a. A travel plan will not promote alternatives to the use of private cars and is not enforceable. Currently most employees and users of the industrial estate arrive by motor vehicle (Boreham Conservation Society PSQ25-5255)
- The existing employment area is a bad example of town planning, an eyesore with larger industrial type operations and in an inappropriate location for employment space. The proposed buildings are not appropriate to the site and its setting and would be a considerable and unacceptable encroachment into open countryside (Boreham Conservation Society PSQ25-5255)
- The site will not provide jobs for local people, a survey of the existing employment area found only one person living in Boreham (Boreham Conservation Society PSQ25-5255)
- Existing cycle and walkways are poorly maintained (Boreham Conservation Society PSQ25-5255)
- Concern over the loss of prime agricultural land, increased flood risk and that the site lacks mains utilities (Boreham Conservation Society PSQ25-5255)
- Concerns over road safety for users of the adjacent bowling club and adverse impacts on the peace and tranquillity of the area (Boreham Bowling Club PSQ25-5736)
- National Highway's Junction Assessment Report is likely to underestimate traffic impacts on the junction of Waltham Road and Main Road
- Concerns over adverse impact on Essex Police Traffic Division at Boreham Airfield from additional traffic
- Concerns over additional traffic impacts on unsuitable local roads and at the junction off Main Road and pedestrian safety
- The policy is silent on traffic on Main Road
- There is no information on operational hours, traffic volumes and HGV numbers
- There is no travel plan and bus provision is limited
- Poor existing cycle and pedestrian walkways provision and inadequate space across the A12 bridge for a dedicated cycle route
- The current site is poorly managed with many operations spilling onto the access road creating hazards
- Concerns over landscape impacts from the new buildings and, noise and air pollution
- Concerns over loss of countryside and agricultural land
- Lack of mains utilities
- The site lies outside Boreham's DSB
- Concerns over a lack of a precise size or site boundary
- The site appears to be larger than needed.

Location 14 – Ford End

Growth Site Policy 14b – Land South of Ford End Primary School

Key statistics:

Consultation point	Total number of responses
Growth Site Policy 14b – Land South of Ford End Primary School	9

Summary of Representations – main issues and requested changes:

- Support the allocation and for infrastructure requirements to be 'appropriate improvements as necessary' meaning they can be proportionate to the amount of housing on the site and not affect the viability of the development proposals coming forward (Dandara PSQ25-6297)
- The wider promoted site should be allocated for up to 50 dwellings to help deliver more community benefits (Dandara PSQ25-6297)
- The site allocation is supported. Welcome the Council's Heritage Impact Assessment and the inclusion of heritage criteria within the policy (Historic England PSQ25-5813)
- Support for the policy and would consider a higher capacity where for example, the development accords with the Parish Plan and Village Design Statement and delivers local highways improvements including traffic calming, speed restrictions and an average speed camera scheme through the village (Great Waltham Parish Council PSQ25-476)
- Unclear the reason for and the impact of a later site start date (2030/31 compared with 2029/30 in the Preferred Options) (Great Waltham Parish Council PSQ25-476)
- Support the proposal and the positive change it will bring to the local area such as ensuring the primary school remains open and a speed camera on Main Road B1008
- Para 7.330 should be amended to remove the reference to dropping-off pupils by car as this practice is not supported (Essex County Council PS25-229)
- Consider 50 homes to achieve more than the speed camera and to help pay for an Asset of Community Value
- Concerns over existing traffic and no crossing point - speed reduction measures would be necessary
- Concerns over pupil safety if the new homes would access the school from the front entrance
- Ford End is not a sustainable location and car dependent
- Concerns over highway safety impacts on houses opposite the site
- Dandara's road safety measures have already been rejected by Highways
- Suggest that the site promoter is not interested in residents' safety concerns
- Lack of school capacity
- Heritage impacts given the school is a non-designated heritage asset
- Loss of agricultural land
- Impact on neighbouring residential amenity including loss of light, privacy and air pollution.

Location 15 – Strategic Growth Site Policy 15 – Little Boyton Hall Farm Employment Area

Consultation point	Total number of responses
Strategic Growth Site Policy 15 – Little Boyton Hall Farm Employment Area	5

Summary of Representations – main issues and requested changes:

- Broadly support the site policy. The allocation is suitable, achievable and logical and there is demand for the additional employment land which will support the local economy. Development can be delivered in a manner which does not undermine the significance or setting of the Grade II Little Boyton Hall (CJH Farming Ltd PS25-288)
- Our Summary Landscape and Visual Appraisal for the site considers views from within the Chignal Parish area. This concludes that subject to careful design, the site could be developed without any intrinsic alteration of the landscape character or harming visual amenity (CJH Farming Ltd PS25-288)
- We welcome the Council's Heritage Impact Assessment and the inclusion of heritage criteria within the site policy. Overall, we support the site and consider it sound (Historic England PSQ25-5814)
- Support for the site allocation. Little Boyton Hall is a popular employment area with tenants, and many are looking to expand (Mr Christopher Philpot PSQ25-5334)
- There should be more flexibility to include also Use Class E(g)(i-ii) to save any ambiguity for future tenants (Mr Christopher Philpot PSQ25-5334)
- Clarity is required on the economic and environmental impact of this proposal, and how it would benefit the community. New job opportunities should be advertised within the parish first (Roxwell Parish Council PSQ25-5825)
- The A1060 is an unsafe road, and the speed limit should be extended beyond its current boundary at Boyton Hall to cover the junction with Vicarage Road (Roxwell Parish Council PSQ25-5825)
- Allocate Tarmac's Roxwell Quarry Former Plant Site as a Rural Employment Area (Tarmac PSQ25-6333).

Growth Area 3 – South and East Chelmsford (paragraphs 7.340-7.348 and Figure 18)

Consultation point	Total number of responses
Growth Area 3 – South and East Chelmsford (Paragraphs 7.340-7.349 and Figure 18)	3

Summary of Representations – main issues and requested changes:

- Concern about increased traffic congestion and the burden on infrastructure that will be caused by a succession of proposed developments beyond the eastern boundary of Great Baddow (Great Baddow Parish Council PSQ25-4922)
- Traffic impact assessments have been conducted in isolation for the various developments rather than a comprehensive study of the cumulative impact of all new housing, industrial sites and growth from existing development (Great Baddow Parish Council PSQ25-4922)
- At the time of the adopted plan the A12 was regarded as the eastern boundary of Chelmsford's built-up area and would not be extended beyond that. Nothing has changed to consider this location for development now (Great Baddow Parish Council PSQ25-4922).

Location 16 – East Chelmsford

Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm)

Key statistics:

Consultation point	**Total number of responses**
Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm)	2,911

Summary of Representations – main issues and requested changes:

- Support the allocation of the site, which represents a deliverable development in a sustainable location afforded by its proximity to both existing and planned infrastructure (Wates Developments and Hammonds Estates LLP PS25-242)
- Supports the decision to meet part of the new housing requirement with a new sustainable community alongside the A12, within reach of the new Beaulieu rail station. It is a significantly better option than the alternative of more piecemeal development at several less sustainable locations (Broomfield Parish Council PSQ25-6495)

Legal Compliance

- The consultation portal is unsound, creating significant barriers to public participation and undermining the legitimacy of the consultation process (Langford and Ulting Parish Council PSQ25-736, Little Baddow Society PSQ25-3249)
- The consultation process was inadequate, lacking sufficient engagement with relevant stakeholders, and failing to provide accessible information to all
- Alternative submission options, such as email or paper form, were available, however the paper form is difficult to complete and unclear. Submitting via email is difficult in other ways disadvantaging those who struggle with

complex forms and submitting via email the user risks having their objections ignored
- The unclear guidance and lack of transparency suggests the system is designed for procedural compliance rather than meaningful engagement, violating principles of fair public consultation
- The Local Plan is legally unsound and does not comply with the Town and Country Planning (Local Planning) (England) Regulations 2012, rendering it potentially unlawful and open to legal challenge. Specifically, during Regulation 18 which required local planning authorities to notify and invite representations from residents and stakeholders during plan preparation

Duty to Cooperate

- The reasoned justification relating to the submitted Minerals Resource Assessment undertaken for the site is an accurate reflection of the situation (Wates Developments and Hammonds Estates LLP PS25-267)
- The site lies within a Minerals Safeguarding Area. It is not yet known whether the site contains a viable minerals resource that would require extraction prior to development. This should be established before allocating the site and not at the planning application stage (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6173)
- The site lies within a Minerals Safeguarding Area, and development of the site will sterilise its potential for minerals workings (Boreham Conservation Society PSQ25-5257)
- A Minerals Assessment has not been done for the site, and mineral extraction and land restoration are likely to be required before homes can be built on site. This will severely delay the site (Croudace Homes PS25-362)
- If there are minerals on site, then the same argument for not developing further within the plan period at North East Chelmsford would be the case for this site
- The consultation does not comply with the Council's Local Development Scheme (LDS) or Statement of Community Involvement (SCI) as the necessary consultation was not undertaken as Maldon Town Council and Natural England were unaware of the Pre-Submission consultation
- The Council has failed in its legal duty to conduct a genuine, inclusive, and transparent public consultation process. The consultation was inadequate, misleading, and proved inaccessible to many residents who are not regular computer users, violating key principles of democratic planning which contravenes the Planning and Compulsory Purchase Act 2004, which emphasises the importance of community involvement in the planning process
- The Pre-Submission Local Plan is inconsistent with the NPPF, for example the NPPF emphasises sustainable development and effective use of land; however, the Local Plan proposes developments that may lead to environmental degradation and unsustainable land use
- Neighbourhood Plans for Sandon and Little Baddow have recently been "made" and are supposed to carry equal weight with any other part of the

Local Plan. The proposals at this site cannot be considered as consistent with either of these Neighbourhood Plans

- The Council has failed in its legal Duty to Co-operate by neglecting to properly engage with neighbouring authorities on cross-border planning issues, making the plan legally unsound. Specifically, Maldon Town Council and Natural England were completely unaware of the Site (Little Baddow Society PSQ25-3249)
- There is no evidence that that key cross-boundary strategic matters, including housing allocations, infrastructure, and environmental considerations have been effectively addressed, breaching legal obligations under the Localism Act 2011. Without clear agreements and co-operative strategies, the Plan should not be approved

Soundness

Highways

- Bullets 4, 5 and 7 under the Movement and Access section, that seek to ensure new/enhanced routes are integrated with existing active travel networks to provide suitable connections to nearby settlements, employment and recreational opportunities are supported (Wates Developments and Hammonds Estates LLP PS25-249)
- Support for the proposed highway improvements necessary to support the development in bullet point 11 and the reasoned justification. Additional highways modelling undertaken by the site promotors supports the Council's Local Plan modelling (Wates Developments and Hammonds Estates LLP PS25-252)
- Although well developed, the National Highways A12 Junction 19 Chelmsford to J25 Marks Farm improvement scheme is not guaranteed to be delivered due to the uncertain political environment. Therefore, a Local Plan traffic modelling scenario was required where the scheme is either delayed or doesn't go ahead at all. The Local Plan traffic modelling has identified a number of locations on the Strategic Road Network which would come under pressure from increased traffic flows. Namely Junctions 17,18 and 19 on the A12. National Highways previously recommended these locations need a more detailed assessment to understand the scale and nature of the impacts, ideally using a micro simulation model and if necessary suitable mitigation measures found to manage the impact on the junctions and the A12. Third party microsimulation modelling work commenced in 2024 in consultation with National Highways, Essex Highways and CCC. National Highways agreed the base model including methodology and baseline data inputs and have since received the future scenario model (including traffic associated with the Chelmsford Local Plan). We are optimistic that a lot of the issues raised will be resolved before the Examination and would like to continue working closely with CCC with the aim of resolving these issues. As part of this work we will work to develop a greater understanding of the impact of the proposed development upon the A12 and the required mitigation which should go into the IDP (National Highways PSQ25-6447)
- The allocations in the Local Plan will increase the number of residents in proximity of the Strategic Road Network (SRN), in particular site 16a. It is

likely that these locations will be impacted by noise pollution from the SRN and raise the potential for exceedances of air quality standards for which extraordinary measures in the form of permeant speed restriction may need to be considered. This could help with flow and may be required as this section of the A12 reaches capacity (National Highways PSQ25-6447)

- Several polices in the proposed Local Plan set out requirements for developments to reduce the impact on or improve local air quality that does not directly relate to the Strategic Road Network and what mitigation may be required. National Highways will continue to work proactively with CCC on these matters but would recommend a specific policy which identifies how air quality and noise impacts would be monitored and managed and what interventions may be required (National Highways PSQ25-6447)
- Concerns the site could significantly impact upon traffic flows onto the A12 having an impact on businesses within Maldon and the local road network around Maldon. It is requested that consideration is given to the impacts on the local road infrastructure (Maldon District Council PSQ25-4934)
- There are significant strategic highway works required to gain access to the site. This risks the timely delivery and viability of the site (Richborough PS25-178, Gladman Developments Ltd PSQ25-6320)
- The feasibility of delivering multiple routes across, under and over the A12, via a bridge does not appear to have been fully tested (Richborough PS25-178)
- The Councils Sustainable Accessibility Mapping Appraisal concluded that the site is the worst performing of the five approaches considered in the 2022 Issues and Options Consultation (Croudace Homes PS25-362)
- Disagree that the site has the potential for a “good level” of sustainable accessibility, subject to the provision of local amenities and sustainable travel infrastructure. The Cross-Parish Working Group has commissioned Stomor to review the Council’s evidence base on highways and transport matters. This shows there are other growth options available, that are more sustainable and accessible with regards to the existing urban area and where there are already established facilities and other infrastructure and utilities upon which to build and develop. The report concludes that without suitable mitigation (which has not been demonstrated), the allocation will result in an unacceptable impact on highway safety and the residual cumulative impact on the road network will be severe (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6174)
- The planned DCO widening of the A12 corridor, between Junction 19 and Junction 25 may not proceed as the Department for Transport (DfT) is currently reviewing the project and deciding whether to fund it. If it does not go ahead the site is likely to cause a severe impact on this part of the A12 corridor, which already experiences significant congestion and frequent accidents at peak times (Croudace Homes PS25-362, Gladman Developments Ltd PSQ25-6320, Boreham Conservation Society PSQ25-5257)
- Any improvements to the A12 corridor and junctions will take many years. There is no evidence to support the proposed delivery rates of the site without these improvements (Gladman Developments Ltd PSQ25-6320)

- The assumed 60% Modal Shift, to walking, cycling, or public transport, is unrealistic given the location of the site adjacent to the A12 and its distance from employment areas. With no assurance of ongoing and effective public transport provision the site is unsustainable (Croudace Homes PS25-362, Dandara Eastern PSQ25-6212)
- There is no justification or evidence to support 60% of trips taking the form of active and sustainable travel. This figure is overly ambitious and not realistic and if this figure is not achieved the impact on the surrounding highway network will be 'severe', contrary to the NPPF (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6174)
- The existing footpath underpass connecting to Chancellors Park would be upgraded to a cycle route but this is within flood zone 3 and would mean that the community would be largely cut-off during flood events to those seeking to utilise active travel (Dandara Eastern PSQ25-6212)
- Traffic impact assessments have been conducted in isolation for different aspects of the development, rather than as a holistic study of the combined effect of all new housing, commercial sites, and background growth from existing development. There are already traffic issues in the area, and this will make things worse (Langford and Ulting Parish Council PSQ25-736)
- There is congestion on the A12 between Junctions 18 and 19 and on the A414 towards Danbury and Maldon. West of Maldon there is increasing development, the prospect of mineral extraction at Woodham Walter and even construction traffic from Bradwell Nuclear Power Station will impact on the A414. Unclear if the implications of these factors outside the Council area have been taken into consideration (Little Baddow Society PSQ25-3249, Chelmer Valley Landscape Group PSQ25-5141)
- The proposed reduction in car parking provision for homes on the site is concerning and will lead to parking problems for residents of the site and neighbouring communities
- Congestion and traffic noise on the A414 will worsen due to increased vehicles, lack of proper road expansion, and the addition of a new junction near the A12. The A414 is already over capacity, with frequent delays during peak hours. There is no clear plan or funding for mitigation
- Congestion on the A12 will worsen. There is no clear strategy for how the increased traffic on the A12 will be mitigated. The planned 'improvements' lack sufficient funding, design detail, or binding commitments from key infrastructure stakeholders
- The Council's evidence base identifies that development is likely to increase traffic volumes along rural routes through villages including Boreham, Little Baddow, Danbury and Sandon. It is likely that the existing rural lanes will become 'rat runs', to avoid queuing on the A12 and A414, and this could have many adverse consequences for the local highway network within and around these villages, and could also have negative effects in terms of the character and tranquillity of these small, historic settlements, and on the setting and character of the Protected Lanes and Conservation Areas within these areas (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6174, Boreham Conservation Society PSQ25-5257)

- The proposal will increase commuter travel times, cause severe congestion at key pinch points, and lead to greater rat-running through rural villages in the wider area and through the Chelmer Valley itself, of which no mitigation has been put forward in the Local Plan (Little Baddow Society PSQ25-3249, Woodham Walter Parish Council PSQ25-5834, Chelmer Valley Landscape Group PSQ25-5141, Boreham Conservation Society PSQ25-5257)
- The A12 at Junction 18 will not cope with the additional burden of traffic, especially considering further housing development approvals at Maldon (Woodham Walter Parish Council PSQ25-5834)
- The Plan accepts that there will need to be improvements to Junctions 18 and 19 of the A12, but there is no detail of what this will be or funding for it
- The outline planning application for 16b states that there will be tailbacks creating congestion at Junction 18, and this is without any consideration of the additional load from 16a and Location 3, or development from Maldon District
- Mitigation at Junction 19 is unclear, and additional traffic can also be expected here from development in Maldon District. Currently traffic backs up to the Lion Inn at peak times. There is no indication of where the funding for mitigation will come from. National Highways will not have funding given the recent budget cuts they have recently sustained which resulted in cancellation of other plans for enhancement of the A12
- Junction 19 will be unable to handle the additional traffic flows (Chelmer Valley Landscape Group PSQ25-5141)

Heritage

- The Council's HIAs demonstrates that measures can be put in place to appropriately address the potential impacts identified and that the Council has taken a balanced approach to managing development while safeguarding the historic environment. On the basis mitigation and enhancement measures outlined in the Council's HIAs are implemented the site is considered suitable for allocation (Historic England PSQ25-5810)
- The provision of landscaping/conservation buffers in the policy and policies map, and the requirement for proposals to be informed by the submission of a more detailed Heritage Impact Assessment and an Archaeological Desk Based Assessment to guide the site's masterplanning is welcomed (Historic England PSQ25-5810)
- Supports the Garden Community having a landscape led setting. An updated Landscape and Visual Baseline Appraisal has been carried out to appraise the objectives relating to landscape and the natural environment defined in the site policy. A Green Infrastructure Strategy is also submitted. These support that the site is suitable for development from a landscape and visual perspective, and that a high quality development in a landscape setting, working in sympathy with local landscape and heritage assets, is achievable and deliverable (Wates Developments and Hammonds Estates LLP PS25-253)
- The requirement for a "sensitively designed new bridge to mitigate harm" in relation to the Chelmer and Blackwater Navigation Conservation Area is supported and a Bridge Option appraisal of the three proposed bridge

structures demonstrates that this is achievable (Wates Developments and Hammonds Estates LLP PS25-254)

- The proposal will have substantial harm to the significance of the Chelmer and Blackwater Navigation Conservation Area and will have a moderate level of harm to the significance of a large number of listed buildings, Protected Lanes, non-designated heritage assets and Registered Parks and Gardens. The high impact has not been properly justified in the plan, and the evidence base has failed to properly consider other, less harmful, options for development (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6164)
- There will be substantial harm to the significance of the Chelmer and Blackwater Navigation Conservation Area. It is unclear how the proposed access road over the waterway to Junction 19 of the A12 can be achieved while preserving and enhancing the Conservation Area. The addition of the requirement for the bridge to be sensitively designed is not sufficient to mitigate the harm (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6164)
- The Council's Heritage Impact Assessment acknowledges that substantial harm will occur from the proposed development, which is contrary to the NPPF (CPRE Essex PSQ25-6147)
- The area contains evidence of Roman occupation. Archaeological investigations have revealed significant Roman and Iron Age activity, including burial sites and artefacts
- Aerial photography reveals historical structures that may require preservation. Recent surveys indicate the presence of subsurface remains of historical buildings and earthworks. Development without detailed archaeological assessments risks permanent destruction of unrecorded heritage sites (Langford and Ulting Parish Council PSQ25-736)
- A full field archaeology report of the site has not been undertaken, yet the desk-based archaeology report for site 16b identifies "enhanced potential for prehistoric activity". The site has a known history of Roman importance. There are also many examples of more recent heritage assets. Para 207 of the NPPF requires a full field evaluation to be undertaken
- The extent of the archaeology on site is unknown, and until an additional evaluation is undertaken, the Council does not know how much, or which parts of the site will be unavailable for development. The Local Plan is therefore based upon an incomplete evidence base, and until further archaeological investigation is undertaken to understand the extent of the constraints, it cannot be assumed that the site can accommodate the scale of development proposed (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6164)
- Policy DM15 states that planning permission will only be granted for development affecting archaeological sites providing the sites and their settings are protected, enhanced and preserved. There is no archaeology field report or evidence of how such mitigation can be achieved on site

Landscape

- Support for the policy requirements and reasoned justification to provide necessary mitigation to address the cumulative recreational pressure on

SSSIs in proximity to the site and to conserve and enhance biodiversity and avoid adverse effects on nearby woodlands and wildlife sites. It should be noted that this mitigation will need to be considered separately from any mitigation measures designed to reduce impacts on internationally designated sites (Natural England PSQ25-6253)

- Support the requirement to provide high quality semi-natural greenspace of at least 12ha to meet Natural England's 8ha/1000 new population metric and minimum circular dog-walking route on or off site of 2.3km which make use of existing Public Rights of Way and/or highways (para 7.377). It is noted that mitigation for impacts on designated sites will not be able to count towards biodiversity net gain but can contribute to no net loss (Natural England PSQ25-6253)
- The development will lead to significant landscape and visual impacts in the Chelmer Valley and on landscape character generally, some of which are protected by the Boreham VDS, potentially damaging to the ecology and biodiversity of the area (CPRE Essex PSQ25-6147, Croudace Homes PS25-362, Gladman Developments Ltd PSQ25-6320, Chelmer Valley Landscape Group PSQ25-5141, Boreham Conservation Society PSQ25-5257)
- The site conflicts with NPPF paras 174 and 176, which require planning decisions to protect and enhance valued landscapes and to give "great weight" to conserving scenic beauty (CPRE Essex PSQ25-6147)
- Based on both the Amec Foster Wheeler 2017 Landscape Sensitivity and Capacity Assessment and the independent Landscape Character Assessment undertaken by the Parish Councils, the site is an area of high landscape sensitivity, where development cannot be accommodated without irrevocable harm to the distinct and ancient landscape character of the area. The Council's evidence base acknowledges that the land parcel has a 'low to medium capacity' to accommodate development and that development would be "intrusive and difficult to mitigate". The development will result in significant adverse impacts on the landscape setting and the distinctive countryside in the Danbury Ridge area. The Council has failed to demonstrate how these impacts can be adequately mitigated, or how the landscape will be conserved and enhanced (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6153, CPRE Essex PSQ25-6147)
- There will be a substantial loss of natural habitat, as a result of the urbanisation and development of the land. This should not be under-estimated and is a major harmful impact of the proposed allocation, which is not considered in detail in the Council's evidence base (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6170)
- The site involves the loss of high-grade agricultural land which should be protected for self-sufficiency and food security for the country (CPRE Essex PSQ25-6147, Boreham Conservation Society PSQ25-5257)
- The Agricultural Land Classification Report submitted with the Outline Planning Application for development of 16b shows that land as being Grade 3a, so there is every reason to believe that the whole of the 16a site is also Grade 3a. An Agricultural Land Classification Report for site 16a is needed before a decision in made on the site's inclusion in the Plan. Alternative sites

on lower grade land have not been properly considered (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6168, Langford and Ulting Parish Council PSQ25-736, Little Baddow Society PSQ25-3249)

- The Local Plan does not take in to account the exceptional wildlife, in the Hammonds Farm area, in addition to the farmland it is bordered by the Essex Wildlife Trust, owned and managed Water Hall Meadows and Chelmer Valley Conservation Area. Detailed local surveys of sites have not been carried out (Little Baddow Society PSQ25-3249)
- The site consists almost entirely of undeveloped land, rich with trees and other habitat, and it is unclear how strategic development of the land could achieve any uplift in biodiversity, let alone a 20% net gain, especially given the quantum of built development proposed on the land. If the biodiversity impact needs to be mitigated off-site, or through the purchase of statutory credits, this will represent a major loss of biodiversity on site, with consequences for the multitude of species that currently use the valued landscape. Moreover, basing the proposed mitigation on a standard metric / calculation, fails to take into account the rich diversity of established, natural habitat that already exists on the site, and the number and range of species that will actually be displaced by the development proposed by the allocation (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6170)
- The site will result in highly damaging impacts on rare and irreplaceable habitats and vulnerable protected species at designated sites in the area, namely Blakes Wood and Lingwood Common SSSI, Woodham Walter Common SSSI, Waterhall Meadows Local Wildlife Site/Essex Wildlife Trust nature reserve, Long Spring Wood Local Wildlife Site, Hall Wood Local Wildlife Site, Old Hare Wood Local Wildlife Site (Essex Wildlife Trust PSQ25-5062)
- Essex Wildlife Trust has been working in the area to create green corridors in Danbury and Little Baddow parishes to encourage wildlife. The development will impact negatively on this effort (CPRE Essex PSQ25-6147, Boreham Conservation Society PSQ25-5257)
- The increase in disturbance (noise, lighting, littering, cat predation) and recreational impacts resulting from the development, a few metres away from the Waterhall Meadows nature reserve boundary, will destroy the ecological integrity of this site, and most of its rare and special features will be permanently lost due to disturbance, nitrogen enrichment from dog waste, trampling of the vegetation and soil compaction and erosion (Essex Wildlife Trust PSQ25-5062)
- The site would result in a significant increased visitor pressure to the Danbury Ridge woodland SSSIs, resulting in an increase in impacts such as the trampling of ground flora, soil erosion, nutrient enrichment from dog waste and increased illegal behaviours such as littering, and the general disturbance to wildlife (Essex Wildlife Trust PSQ25-5062)
- The site lies within the Impact Risk Zone (IRZ) for Blakes Wood and Lingwood Common Site of Special Scientific Interest (SSSI) and Woodham Walter Common SSSI (Essex Wildlife Trust PSQ25-5062)
- The proposed ‘new’ Country Park will essentially follow the Chelmer and Blackwater Navigation corridor and encompass part of the site that is at high

risk of flooding. The river corridor already functions as a popular informal and natural ‘country park’ and is well managed by Essex Waterways. The proposal will add no benefit in this respect but has the potential to cause substantial harm to the existing parkland, through the development of the Eastern Orbital Route, which will directly bisect the area. The new route will introduce a major transportation bridge across the canal, with associated main road infrastructure, and will drive substantial traffic through the area (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-616, PSQ25-6177, PSQ25-6172)

- The establishment of a new country park on the western boundary of the site will not be sufficient to mitigate and compensate for the impacts of greatly increased visitor pressure on the SSSIs of the Danbury Ridge (Essex Wildlife Trust PSQ25-5062)
- It will damage an important cultural landscape which is an asset to the area and of national significance as explored by J. A. Baker (Chelmer Valley Landscape Group PSQ25-5141)
- It would have an adverse impact on the landscape of the Chelmer valley in general, with a particular adverse impact on the Chelmer and Blackwater Navigation Conservation Area (Chelmer Valley Landscape Group PSQ25-5141)
- The site will negatively impact local protected sites such as Blakes Wood and Waterhall Meadows, through increased pollution, light intrusion, and footfall. These sites provide vital habitats for diverse flora and fauna, including rare species
- The site has ancient woodlands, nearby SSSIs, and the Chelmer and Blackwater Navigation Conservation Area within it. It has very extensive animal and plant wildlife within and adjacent to it. Adding 3000+ houses and all of the people living in them will put unsustainable pressure on this deeply rural area
- The proposal would devastate a rural landscape and the high levels of biodiversity currently on site
- The plan states a 20% net biodiversity net gain should be achieved on site yet provides no explanation of how this will be achieved, especially in an area already rich in biodiversity. How can a site with existing high ecological value see a genuine net gain when vast areas of farmland, mature trees, and established habitats are lost to development
- The way biodiversity net gain is calculated does not genuinely enhance biodiversity. Loopholes can be exploited by developers. For instance, if a site currently has ten mature trees of two species and all are felled, replacing them with just four trees of different species is classified as a 100% biodiversity net-gain. This is a flawed metric which allows destruction under the guise of environmental improvement. Simply planting a few new flower species that were not previously present on site is treated as a net gain, regardless of the ecological damage done
- There should be a detailed plan showing how biodiversity net-gain will be achieved in this already ecologically sensitive area at this stage
- Alternative sites, such as further development at North East Chelmsford, have better transport links and less impact on the environment and biodiversity

- The proposal would be contrary to Policy DM8 in the Plan as the proposals would harm the intrinsic character, appearance and beauty of the area. The site is a beautiful deeply rural area, with wide open fields, surrounded by waterways, a Conservation Valley, ancient woodlands and practically no buildings. Placing 3000+ houses and industrial buildings of considerable height would be contrary to Policy DM8
- The site will affect the area's attractions for residents and visitors who come to enjoy the woodlands and miles of footpaths with views over the valley and along the Navigation towpath. The pressure on these areas (and on Danbury Lakes) from new development will become significant (CPRE Essex PSQ25-6147, Chelmer Valley Landscape Group PSQ25-5141)

Flood Risk

- The site includes substantial areas of land within Flood Zones 2 & 3 and is in very close proximity to existing waterbodies (Croudace Homes PS25-362)
- The evidence base points to a significant level of flood risk on the proposed site, particularly from reservoirs, and from fluvial flooding along the access route. The implications for the new community and the surrounding areas have not been properly considered, and alternative options have not been fully explored. Flood issues have essentially been put 'on hold', for consideration when the site comes forward, and this is not a rational or justified strategic approach, and is contrary to the requirements of the NPPF (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6167)
- The development site abuts the Chelmer and Blackwater valley. Flood risk mapping shows that parts of the proposed site regularly flood, particularly after heavy rainfall. Without substantial flood defences, development will exacerbate runoff into vulnerable areas downstream
- Climate change is increasing the severity of flood events, yet the Plan does not account for this risk. Existing flood models used in the Plan fail to factor in increased climate-driven rainfall and surface water risks. New housing in a flood-prone area increases risks to property, infrastructure, and emergency response capabilities
- Flooding has always been a problem at Hammonds and every Winter, including 2024/2025, this is increasing, inevitably with the impact of Climate Change the situation will worsen (Little Baddow Society PSQ25-3249, Boreham Conservation Society PSQ25-5257)
- Building on the site will alter water runoff patterns, increasing the risk of flooding in surrounding areas. Paving over permeable land will increase surface water runoff, overwhelming local drainage systems. The risk of downstream flooding in Boreham, Hatfield Peverel, Langford, Ulting and Maldon will rise significantly because of this development (Langford and Ulting Parish Council PSQ25-736, Boreham Conservation Society PSQ25-5257)
- The development will exacerbate flooding in the Chelmer valley, and it is not clear how sewage and wastewater from the development will be effectively dealt with. There is clearly a danger that increased flooding and waste-water discharge from a major housing development will adversely affect water

quality and biodiversity in the Chelmer and its tributaries (Chelmer Valley Landscape Group PSQ25-5141)

Infrastructure

- Support for the expanded policy wording requiring the proposed development to prepare a strategy for responding to the National Grid Electricity Transmission plc overhead transmission lines within the site (National Grid Electricity Transmission PSQ25-6237)
- Support the provision of pedestrian, cycleway and bridleways within the site, the provision of a coherent network of public open space, formal and informal sport, recreation and community space, and the provision of, or making financial contributions to, new or enhanced sport, leisure and recreation facilities (Sport England PS25-89)
- Recognition of opportunities for dual use sports facilities within the new secondary school is welcomed and justified by the Council's new sports evidence base (Sport England PS25-89)
- The timing of infrastructure will be critical to ensure that trips are not made offsite in initial phases, and the infrastructure does not come at a cost to overall affordable housing delivery (Gladman Developments Ltd PSQ25-6320)
- At this stage there is no evidence to suggest that the required level of infrastructure, services and amenities could feasibly or viably accommodate such a large increase in the number of houses and residents (Richborough PS25-178)
- The amount of infrastructure required will be complex to design, agree, secure, fund and deliver, risking delays to the viability and delivery timeframes of the site (Bellway Homes Ltd (Essex) PSQ25-6361, PSQ25-6389, Dandara Eastern PSQ25-6211, Hill Residential Ltd PSQ25-3146)
- Local facilities, such as existing schools, doctors, hospitals, dentists, open space will be overwhelmed by the additional housing (Woodham Walter Parish Council PSQ25-5834)

Other

- At the time of the adopted plan the A12 was regarded as the eastern boundary of Chelmsford's built-up area and would not be extended beyond that. Nothing has changed to consider this location for development now (Croudace Homes PS25-362, Boreham Conservation Society PSQ25-5257)
- The developable site area has been reduced but the number of homes has not, even though the site's capacity was initially considered to be lower at the Issues and Options stage (Bellway Homes Ltd (Essex) PSQ25-6361, PSQ25-6389)
- Developing beyond the A12 boundary sets a precedent for further development in the future on areas of land which are sensitive landscapes
- Other options, such as further development at North East Chelmsford, have not been properly considered. The Issues and Options consultation saw five options, all of which saw an additional 3,000 homes in North East Chelmsford. When the Council was ahead of the housing target numbers North East Chelmsford was dropped and Location 16 taken forward instead

- North Chelmsford is an already urbanised area, with little in terms of landscape and wildlife of any interest. Meanwhile in Little Baddow and Danbury we have a mix of rural, good quality farmland and woodlands that are managed and preserved by The National Trust and Essex Wildlife Trust. The plan will destroy the attractiveness of the area and put unsustainable pressure on the wildlife in the area. It has not been properly justified why North East Chelmsford is not being included for further development instead of Location 16
- The site is in multiple ownerships and therefore constraints associated with land values and timely delivery where existing uses need to be stopped, will impact the ability to start timing construction (Richborough PS25-178)
- The site will result in a series of adverse impacts, many of which will result in a very high level of harm and are why the land was not allocated for development in the current adopted Local Plan. Nothing has changed since then to support the site (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6163, PSQ25-6177, PSQ25-6176)
- Other land would be more suitable for such development and other reasonable alternatives have not been fully identified or assessed (J & T Wardrop and the Wardrop Trust PS25-114, Richborough PS25-178, Croudace Homes PS25-362, Dandara Eastern PSQ25-6212, Gladman Developments Ltd PSQ25-6320, Bellway Homes Ltd (Essex) PSQ25-6361, PSQ25-6389, CPRE Essex PSQ25-6147, Boreham Conservation Society PSQ25-5257)
- The site is unsustainable as it is too detached from Chelmsford to be considered as an urban extension but too close to be a new settlement (Croudace Homes PS25-362, Dandara Eastern PSQ25-6212)

Changes requested

Amount and type of development

- The amount and type of development and the delivery timeframe is supported. The tenure, type and mix of the housing provision across all site allocations will be determined by Policies DM1 and DM2. The content mix of these policies is broadly supported but consider there is an opportunity to deliver a broader mix of tenures and types on site, such as Build to Rent, intermediate rent, co-living, older persons and keyworker housing which are not reflected in the Local Plan Review's development management policies. Each of these tenures comes with its own optimal unit mix, so this could require the ability to depart from the policy mix. Propose that additional wording be added to invite consideration of a bespoke and broader housing mix on this site to the reasoned justification (Wates Developments and Hammonds Estates LLP PS25-245)
- Support the provision of two Gypsy and Traveller sites but consider the additional 13 Travelling Showpeople plots has been unjustifiably transferred from site 6 North East Chelmsford since the Regulation 18 consultation. The addition of this requirement to Site 16a does not reflect the respective scales of the two Garden Community allocations; it does not distribute needs appropriately across the district; and it will be challenging to accommodate at Site 16a in tandem with the proposed Gypsy and Traveller provision. The requirement for 13 Travelling Showpeople plots should be removed from this

site policy and reinstated at site 6 (Wates Developments and Hammonds Estates LLP PS25-247)

Movement and Access

- The requirement to 'Provide Bus Based Rapid Transit Infrastructure' and the associated text in the reasoned justification should be expanded so as not to pre-judge the nature of the rapid transit measures that will be most suitable for the site, at this stage. The wording should be broadened to enable the appropriate strategy to be determined to respond to prevailing circumstances, and through subsequent planning stages (Wates Developments and Hammonds Estates LLP PS25-251)

Historic and Natural Environment

- Bullet points 3, 4, 5, 6, 7, 8 and 9 in the Historic and Natural Environment section each include a requirement to preserve, enhance or retain the significance of particular heritage assets. This is considered a binary approach, which are not fully consistent with the NPPF, or with Council's draft Policies DM13, DM14 and DM15, which are themselves in line with the NPPF's heritage tests. These bullets could either be removed entirely, as the issue is covered by the Council's development management policies, or it should be clear that the assessment of these assets' treatment will be governed by draft Policies DM13, DM14 and DM15 (Wates Developments and Hammonds Estates LLP PS25-254)
- Bullet point 5 under Historic and Natural Environment includes a requirement to preserve and where appropriate enhance the "listed buildings, structures and setting" of a range of listed heritage assets. This part of the policy is not accurate, as only one of the quoted heritage assets (the Grade II listed Hammonds Farmhouse) physically falls within the allocation boundary. In relation to the other 14 assets quoted, the only element the allocation will have control over is the "setting" where it overlaps with the allocation. The wording should be adjusted (Wates Developments and Hammonds Estates LLP PS25-254)
- The requirement to retain the significance of Graces Walk and Hurrells Lane is supported, but there does not appear to be evidence that buffers should be either "substantial" or "extensive and considers that this pre-judges the outcome of the masterplan process, which is acknowledged to be the appropriate stage to establish the site's detailed preservation and enhancement principles. A 'substantial buffer' into the heart of the masterplan would cause safety issues from a lack of overlooking and lighting, and unhelpfully divide the land uses such as education, employment and housing, leading to residents opting to use cars for short journeys rather than by bike or on foot. It also unduly sacrifices development land which could be contributing to meeting housing need (Wates Developments and Hammonds Estates LLP PS25-254)
- Add supporting text to clarify that proposals should adhere to the recommendations of the Council's Heritage Impact Assessment for the site (Historic England PSQ25-5810)

- Move the second heritage bullet ("Prepare a detailed Heritage Impact Assessment") to the top and reword it to emphasise that the assessment should inform both positive placemaking and the site's masterplanning (Historic England PSQ25-5810)
- Welcome the fifth heritage bullet, particularly the reference to farmsteads and landscape buffers to protect settings. However, "landscape buffers" may suggest a tree belt, whereas open space or breathing space around these assets is also important. The wording should be amended to clarify this (Historic England PSQ25-5810)
- The bullet point relating to the area to the east of Sandon Brook, which is notated as space for "Recreation/SuDS/Biodiversity", should be expanded to allow for solar/appropriate renewable energy uses in addition to the uses listed (Wates Developments and Hammonds Estates LLP PS25-256)
- Support the allocation of space for future recreation, SuDs, and biodiversity to the east of the site, but consider that the policy should be amended to make it clear that formal sports provision, built development, or floodlighting in this area is not suitable in this area (Historic England PSQ25-5810)
- Additional landscaping should be incorporated at the northern end of the site, particularly around the Grade I listed Church of St Mary the Virgin and the Grade II listed Little Baddow Hall, to reinforce their setting and help mitigate visual impacts of new development (Historic England PSQ25-5810)
- The requirement to undertake an Archaeological Assessment and conserve existing archaeological features could be interpreted to imply that all archaeological remains found within the site would be of such a high level of significance that they would all warrant retention. The Archaeological and Heritage Appraisal submitted shows no current evidence that demonstrates any remains on site are of such a high level of significance that such mitigation is warranted. The requirement should be amended or removed and such matters dealt with by Policy DM15 (Wates Developments and Hammonds Estates LLP PS25-258)
- Support the requirement to provide necessary mitigation in relation to cumulative recreational pressure on local SSSIs. However, the reasoned justification refers to providing semi-natural greenspace to 'meet Natural England's 8ha/1000 new population metric and minimum circular dog-walking route on or off site of 2.3km'. If this scale of mitigation is to be expected in relation to the local SSSIs, the area provided must be able to double up as Suitable Alternative Natural Greenspace (SANG) if such is required for potential recreational impacts on the Blackwater Estuary SPA (Policy DM16). Additional wording should be added setting this out (Wates Developments and Hammonds Estates LLP PS25-257)
- Taken as a whole the mosaic of habitats across Danbury Ridge is an important landscape for wildlife. The site should include the requirement to undertake a SSSI Impact Assessment, and the reasoned justification text requiring developers to work closely with local stakeholders should be moved into the policy itself (National Trust PS25-176)
- The site could indirectly impact the SSSIs through cumulative recreational pressure without appropriate mitigation measures. Impacts on the SSSIs and Ancient Woodlands should be assessed at the Local Plan stage and scale, rather than for individual planning applications, so that cumulative impacts for

the plan period can be adequately assessed and appropriate mitigation secured (National Trust PS25-176)
- Broadly support the application of a higher policy target of 20% for biodiversity net gain. Early calculations indicate that this target would be achievable. The reasoned justification references 'subject to site constraints'. This is interpreted as 20% specifically limited to what is practically deliverable onsite and not the expectation that offsite provision or credit top ups could be sought to reach the higher target value of 20%, as having to buy credits off site could hamper viability. The policy and reasoned justification should be amended to state this requirement should be capped at what can be practically delivered onsite (Wates Developments and Hammonds Estates LLP PS25-242)

Site infrastructure requirements

- Reference should be added to the requirements and reasoned justification relating to education provision being proportionate to pupil yield generated from the development, so that its delivery and funding at the time allows for Section 106 contributions from other developments locally to contribute as required (Wates Developments and Hammonds Estates LLP PS25-260)
- To ensure the education provision meets the identified need created by the site, and reflects the appropriate range of delivery scenarios, it is considered necessary to extend the reasoned justification to reflect the option to deliver the school directly (Wates Developments and Hammonds Estates LLP PS25-262)
- Strongly support any SEND provision within the site and request consideration is given to changing one of the schools on the site to a SEND school or making provision for an additional SEND school on the site (Maldon District Council PSQ25-4931)
- Add an additional bullet under 'Site infrastructure requirements' in line with the ECC Developers' Guide to read: Financial contributions to primary, secondary, early years education and childcare, including SEND education as required by the Local Education Authority (Essex County Council PS25-233)
- Reasoned Justification should include reference to a safe traffic free environment around school pedestrian entrances being provided, ensuring access for emergency vehicles only (Essex County Council PS25-231)
- Primary healthcare provision at the site is supported, but the requirement in relation to healthcare provision should be limited to primary healthcare; there is no justification for strategic health needs to be met via planning obligations. The new requirement for facilities to support police, ambulance, fire and rescue facilities should also be removed as it is too broad and needs to be specific and evidenced (Wates Developments and Hammonds Estates LLP PS25-260)
- Support the section on stewardship but suggest a draft business plan is sufficient to be provided as part of the planning application (Wates Developments and Hammonds Estates LLP PS25-266)
- The proposed link road to A12 Junction 19 will be elevated above the flood plain and its embankments will slow down discharge of surface water increasing the risks of flooding up stream, it will split any proposed development in two, and compromise the views to and from the Listed

Boreham House, and its separately listed grounds (Boreham Conservation Society PSQ25-5257)

Other

- The upper limit placed on the size of a proposed convenience store, as 500sqm should be removed as a larger food store is expected to be needed for the purpose of supporting internal trips within the garden community and minimising vehicle trips offsite (Wates Developments and Hammonds Estates LLP PS25-260)
- Reference to the planning and design of development to be required to encourage healthy and active lifestyles in line with the Active Design guidance is particularly welcomed. However, reference to Public Health England should be removed from paragraph 7.361 to ensure that the plan is accurate as Public Health England no longer exists (Sport England PS25-89)
- For consistency across the Local Plan the site policy should be amended to state that the masterplan must be in place prior to the determination of any planning application, as is the case for other strategic sites (Wates Developments and Hammonds Estates LLP PS25-269)
- There should be a requirement to utilise the potential of the Chelmer & Blackwater Navigation for recreational use for the benefit of the development and its proposed Country Park, including consideration of Chelmsford Canoe Club (Essex Waterways Ltd PSQ25-5218, Chelmsford Canoe Club PS25-255)
- There should be a requirement to utilise, link and provide financial contributions to the proposed Visitor Centre at Sandford Mill (Essex Waterways Ltd PSQ25-5218)
- It would improve clarity if the reasoned justification were amended to include specific reference to flood risk management infrastructure to reiterate the requirement for financial contributions towards CFRPP as set out in the Council's Level 2 SFRA (Environment Agency PSQ25-6289).

<u>Strategic Growth Site Policy 16b – Land adjacent to A12 Junction 18 Employment Area</u>

Consultation point	**Total number of responses**
Strategic Growth Site Policy 16b – Land adjacent to A12 Junction 18 Employment Area	2,792

Summary of Representations – main issues and requested changes:

Legal Compliance

- The consultation portal is unsound, creating significant barriers to public participation and undermining the legitimacy of the consultation process (Langford and Ulting Parish Council PSQ25-734, Little Baddow Society PSQ25-3251)

- The consultation process was inadequate, lacking sufficient engagement with relevant stakeholders, and failing to provide accessible information to all
- Alternative submission options, such as email or paper form, were available, however the paper form is difficult to complete and unclear. Submitting via email is difficult in other ways disadvantaging those who struggle with complex forms and submitting via email the user risks having their objections ignored
- The unclear guidance and lack of transparency suggests the system is designed for procedural compliance rather than meaningful engagement, violating principles of fair public consultation
- The Local Plan is legally unsound and does not comply with the Town and Country Planning (Local Planning) (England) Regulations 2012, rendering it potentially unlawful and open to legal challenge. Specifically, during Regulation 18 which required local planning authorities to notify and invite representations from residents and stakeholders during plan preparation

Duty to Cooperate

- The consultation does not comply with the Council's Local Development Scheme (LDS) or Statement of Community Involvement (SCI) as the necessary consultation was not undertaken as Maldon Town Council and Natural England were unaware of the Pre-Submission consultation
- The Council has failed in its legal duty to conduct a genuine, inclusive, and transparent public consultation process. The consultation was inadequate, misleading, and proved inaccessible to many residents who are not regular computer users, violating key principles of democratic planning which contravenes the Planning and Compulsory Purchase Act 2004, which emphasises the importance of community involvement in the planning process
- The Pre-Submission Local Plan is inconsistent with the NPPF, for example the NPPF emphasises sustainable development and effective use of land; however, the Local Plan proposes developments that may lead to environmental degradation and unsustainable land use
- Neighbourhood Plans for Sandon and Little Baddow have recently been "made" and are supposed to carry equal weight with any other part of the Local Plan. The proposals at this site cannot be considered as consistent with either of these Neighbourhood Plans
- The Council has failed in its legal Duty to Co-operate by neglecting to properly engage with neighbouring authorities on cross-border planning issues, making the plan legally unsound. Specifically, Maldon Town Council and Natural England were completely unaware of the Site (Little Baddow Society PSQ25-3251)
- There is no evidence that that key cross-boundary strategic matters, including housing allocations, infrastructure, and environmental considerations have been effectively addressed, breaching legal obligations under the Localism Act 2011. Without clear agreements and co-operative strategies, the Plan should not be approved
- A Minerals Resource Assessment has been carried out which demonstrates that the ground conditions are unlikely to represent a suitable or sufficient

sand and gravel resource to warrant viable use of the site for mineral extraction. It is not considered that mineral extraction of the site can feasibly be required, and minerals are not, therefore, a constraint to its timely development for employment use (Pigeon (Sandon) Ltd PS25-238)

- A Minerals Assessment has not been done for the site
- If there are minerals on site, then the same argument for not developing further within the Plan period at North East Chelmsford would be the case for this site
- The site lies within a Mineral Safeguarding Area and the minerals on the site should not be sterilised by development ()
- The site lies within a Minerals Safeguarding Area, and development of the site will sterilise its potential for minerals workings (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6179, PSQ25-6181, PSQ25-6188, PSQ25-6185, Boreham Conservation Society PSQ25-5259)

Soundness

Amount and type of development

- The proposed allocation for employment development is justified, effective, consistent with national policy, and helps ensure the new Local Plan can be considered positively prepared (Pigeon (Sandon) Ltd PS25-238)
- Concern regarding the impact this site could have on the economy of the Maldon District if businesses within the Maldon district find this site more attractive due to its proximity to the A12 for the distribution of goods, resulting in a relocation of their business to this site. If this is the case, there could be a loss of jobs within the Maldon district, resulting in fewer employment opportunities for Maldon residents and impact on the local economy (Maldon District Council PSQ25-4932)
- No specific concerns over the soundness of this policy but would like to emphasise the importance of ensuring that the delivery of this site does not place an undue burden on cross-boundary infrastructure and is adequately supported by local infrastructure improvements, including enhanced North-South public transport and active travel infrastructure to take account of the additional pressure on the county's highways network created by this quantum of employment space. Welcome opportunities for further discussions to ensure the site can come forward in a way that is environmentally, economically and socially sustainable (Brentwood Borough Council PSQ25-6160, Rochford District Council PSQ25-6195)

Highways

- In terms of vehicular movements and impact on the highway network of this site, it benefits from its proximity to the strategic road network, limiting impact on local highways. The Transport Assessment submitted within the planning application includes an appraisal of the traffic likely to be generated and considers the impact of the site's development on the capacity and safety of the highway network. It shows that development of the site is not forecast to give rise to material increases in traffic flow beyond A12 Junction 18 and the

site access works. The assessments confirm that the site access and off-site junctions of interest would continue to operate satisfactorily with the development in place, subject to completion of the embedded mitigation works, even accounting for the forecast increase in vehicular movements up to 2036 (Pigeon (Sandon) Ltd PS25-238)

- The assumed 60% Modal Shift, to walking, cycling, or public transport, is unrealistic given the location of the site adjacent to the A12 and its distance from employment areas. With no assurance of ongoing and effective public transport provision the site is unsustainable
- The proposed reduction in car parking provision for homes on the site is concerning and will lead to parking problems for residents of the site and neighbouring communities
- Traffic impact assessments have been conducted in isolation for different aspects of the development, rather than as a holistic study of the combined effect of all new housing, commercial sites, and background growth from existing development. There are already traffic issues in the area, and this will make things worse (Langford and Ulting Parish Council PSQ25-734)
- The development is expected to have a severely harmful impact on the operation of the highway network (A12 and A414), which is already congested and at capacity in the peak hours, and the existing dual A12 carriageways are not due to be widened as part of the strategy. The scheme will also impact upon the local rural roads, adversely affecting small villages such as Sandon and Danbury, as drivers seek alternative routes through the countryside. This will have a harmful impact on the historic setting of these villages, and will also pose serious highways safety risks (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6186, PSQ25-6179, PSQ25-6181, PSQ25-6188)
- There is congestion on the A12 between Junctions 18 and 19 and on the A414 towards Danbury and Maldon. West of Maldon there is increasing development, the prospect of mineral extraction at Woodham Walter and even construction traffic from Bradwell Nuclear Power Station will impact on the A414. Unclear if the implications of these factors outside the Council area have been taken into consideration (Little Baddow Society PSQ25-3251, Chelmer Valley Landscape Group PSQ25-5145)
- The planned DCO widening of the A12 corridor, between Junction 19 and Junction 25 may not proceed as the Department for Transport (DfT) is currently reviewing the project and deciding whether to fund it. If it does not go ahead the site is likely to cause a severe impact on this part of the A12 corridor, which already experiences significant congestion and frequent accidents at peak times (Boreham Conservation Society PSQ25-5259)
- Congestion on the A414 will worsen due to increased vehicles, lack of proper road expansion, and the addition of a new junction near the A12. The A414 is already over capacity, with frequent delays during peak hours. There is no clear plan or funding for mitigation
- Concern the site could significantly impact upon traffic flows onto the A12 having an impact on businesses within Maldon and the local road network around Maldon. It is requested that consideration is given to the impacts on the local road infrastructure (Maldon District Council PSQ25-4936)
- Congestion on the A12 will worsen. There is no clear strategy for how the increased traffic on the A12 will be mitigated. The planned ‘improvements’

lack sufficient funding, design detail, or binding commitments from key infrastructure stakeholders

- The Council's evidence base identifies that development is likely to increase traffic volumes along rural routes through villages including Boreham, Little Baddow, Danbury and Sandon. It is indeed entirely likely that the existing rural lanes will become 'rat runs', to avoid queuing on the A12 and A414, and this could have many adverse consequences for the local highway network within and around these villages, and could also have negative effects in terms of the character and tranquillity of these small, historic settlements, and on the setting and character of the Protected Lanes and Conservation Areas within these areas (Boreham Conservation Society PSQ25-5259)
- The proposal will increase commuter travel times, cause severe congestion at key pinch points, and lead to greater rat-running through rural villages in the wider area and through the Chelmer Valley itself, of which no mitigation has been put forward in the Local Plan (Little Baddow Society PSQ25-3251, Woodham Walter Parish Council PSQ25-5835, Chelmer Valley Landscape Group PSQ25-5145, Boreham Conservation Society PSQ25-5259)
- The A12 at Junction 18 will not cope with the additional burden of traffic, especially considering further housing development approvals at Maldon (Woodham Walter Parish Council PSQ25-5835)
- The Plan accepts that there will need to be improvements to Junctions 18 and 19 of the A12, but there is no detail of what this will be or funding for it
- The outline planning application for 16b states that there will be tailbacks creating congestion at Junction 18, and this is without any consideration of the additional load from 16b and Location 3, or development from Maldon District
- Mitigation at Junction 19 is unclear, and additional traffic can also be expected here from development in Maldon District. Currently traffic backs up to the Lion Inn at peak times. There is no indication of where the funding for mitigation will come from. National Highways will not have funding given the recent budget cuts they have recently sustained which resulted in cancellation of other plans for enhancement of the A12
- Junction 19 will be unable to handle the additional traffic flows (Chelmer Valley Landscape Group PSQ25-5145)

Landscape and ecology

- The planning application for the site includes a Landscape and Visual Impact Assessment which sets out that as with any development of greenfield land, there will be localised landscape impacts. However, it demonstrates that the site is appropriate for development from a landscape and visual impact perspective; and that the landscape and visual harms of the development can be substantially mitigated through landscaping (Pigeon (Sandon) Ltd PS25-238)
- Development of the site gives rise to the potential to deliver ecological benefits. The submitted planning application is accompanied by a Biodiversity Net Gain Assessment, which confirms that the development proposed can achieve a 19.59% gain in habitat biodiversity units, a 163.89% net gain in hedgerow biodiversity units on the site, and a net gain of 20.02% in watercourse units along Sandon Brook. This comfortably exceeds the

minimum requirements of the Environment Act 2021 as well as that proposed in Policy DM16 (Pigeon (Sandon) Ltd PS25-238)

- Complete erosion of a large area of locally distinctive and valued landscape. The proposal will irreversibly urbanise a tranquil, scenic rural area, where development has historically been prohibited (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6184, PSQ25-6179, PSQ25-6181, PSQ25-6188)
- The site will negatively impact local protected sites such as Blakes Wood and Waterhall Meadows, through increased pollution, light intrusion, and footfall. These sites provide vital habitats for diverse flora and fauna, including rare species
- The site has ancient woodlands, nearby SSSIs, and the Chelmer and Blackwater navigation within it. It has very extensive animal and plant wildlife within and adjacent to it. Adding 3000+ houses and all the people living in them will put unsustainable pressure on this deeply rural area
- Essex Wildlife Trust has been working in the area to create green corridors in Danbury and Little Baddow parishes to encourage wildlife. The development will impact negatively on this effort (Boreham Conservation Society PSQ25-5259)
- The proposal would devastate a rural landscape and the high levels of biodiversity currently on site
- The development will lead to significant landscape and visual impacts in the Chelmer Valley and on landscape character generally, some of which are protected by the Boreham VDS, potentially damaging to the ecology and biodiversity of the area (Chelmer Valley Landscape Group PSQ25-5145, Boreham Conservation Society PSQ25-5259)
- It will damage an important cultural landscape which is an asset to the area and of national significance as explored by J. A. Baker (Chelmer Valley Landscape Group PSQ25-5145)
- It would have an adverse impact on the landscape of the Chelmer valley in general, with a particular adverse impact on the Chelmer and Blackwater Navigation Conservation Area (Chelmer Valley Landscape Group PSQ25-5145)
- The Plan states a 20% net biodiversity net gain should be achieved on site yet provides no explanation of how this will be achieved, especially in an area already rich in biodiversity. How can a site with existing high ecological value see a genuine net gain when vast areas of farmland, mature trees, and established habitats are lost to development
- The way biodiversity net gain is calculated does not genuinely enhance biodiversity. Loopholes can be exploited by developers. For instance, if a site currently has ten mature trees of two species and all are felled, replacing them with just four trees of different species is classified as a 100% biodiversity net-gain. This is a flawed metric which allows destruction under the guise of environmental improvement. Simply planting a few new flower species that were not previously present on site is treated as a net gain, regardless of the ecological damage done
- There should be a detailed plan showing how biodiversity net-gain will be achieved in this already ecologically sensitive area at this stage

- The site involves the loss of high-grade agricultural land which should be protected for self-sufficiency and food security (Boreham Conservation Society PSQ25-5259)
- An Agricultural Land Classification Report demonstrates that approximately two-thirds of the site comprises Grade 3a land; one third Grade 3b. No Grade 1 or Grade 2 agricultural land. Given that some loss of agricultural land is inevitable to meet development needs, that the land around Chelmsford is generally either Grade 2 or Grade 3, and the other sustainability benefits of allocation of 16b, the benefits of site's development would substantially outweigh the harm engendered by the loss of this agricultural land (Pigeon (Sandon) Ltd PS25-238)
- Development will result in the irreversible loss of agricultural land, 17ha of which is considered to be 'the best and most versatile land' (Grade 3a), and which is currently in active use for food production (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6182, PSQ25-6179, PSQ25-6181, PSQ25-6188)
- The Local Plan does not take in to account the exceptional wildlife, in the Hammonds Farm area, in addition to the farmland it is bordered by the Essex Wildlife Trust, owned and managed Water Hall Meadows and Chelmer Valley Conservation Area. Detailed local surveys of sites have not been carried out (Little Baddow Society PSQ25-3251)
- The site will affect the area's attractions for residents and visitors who come to enjoy the woodlands and miles of footpaths with views over the valley and along the Navigation towpath. The pressure on these areas (and on Danbury Lakes) from new development will become significant (Chelmer Valley Landscape Group PSQ25-5145)
- Alternative sites, such as further development at North East Chelmsford, have better transport links and less impact on the environment and biodiversity
- The proposal would be contrary to Policy DM8 as the proposals would harm the intrinsic character, appearance and beauty of the area. The site is a beautiful deeply rural area, with wide open fields, surrounded by waterways, a Conservation Valley, ancient woodlands and practically no buildings. Placing 3000+ houses and industrial buildings of considerable height would be contrary to Policy DM8

Heritage

- The Council's HIAs has appropriately assessed the potential impacts of development on the historic environment and identified a suitable range of mitigation measures to address them effectively. On this basis, we consider the site suitable for allocation and welcome the inclusion of heritage criteria derived from the Council's HIAs and consider the policy sound (Historic England PSQ25-5811)
- The site does not contain any designated heritage assets. There are however several nearby designated heritage and non-designated heritage assets. A Built Heritage Assessment for the site demonstrates that there are no heritage issues which cannot be appropriately mitigated (Pigeon (Sandon) Ltd PS25-238)

- Considerable harm to the significance of a number of heritage assets and their settings, including the Grade II listed Sandon Lodge, Grade II listed Bridge Farmhouse, Sandon Bridge (Non Designated Heritage Asset), Danbury Park (Grade II Registered Park and Gardens) and the Grade I listed St John the Baptist Church (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6183, PSQ25-6179, PSQ25-6181, PSQ25-6188)
- Potential harm to an area of high archaeological value, which requires further investigation to ensure the conservation and preservation of assets (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6183, PSQ25-6179, PSQ25-6181, PSQ25-6188)
- The area contains evidence of Roman occupation. Archaeological investigations have revealed significant Roman and Iron Age activity, including burial sites and artefacts
- Aerial photography reveals historical structures that may require preservation. Recent surveys indicate the presence of subsurface remains of historical buildings and earthworks. Development without detailed archaeological assessments risks permanent destruction of unrecorded heritage sites (Langford and Ulting Parish Council PSQ25-734)
- A full field archaeology report of the site has not been undertaken, yet the desk-based archaeology report for site 16b identifies “enhanced potential for prehistoric activity”. The site has a known history of Roman importance. There are also many examples of more recent heritage assets. Para 207 of the NPPF requires a full field evaluation to be undertaken
- Policy DM15 states that planning permission will only be granted for development affecting archaeological sites providing the sites and their settings are protected, enhanced and preserved. There is no archaeology field report or evidence of how such mitigation can be achieved on site

Flood Risk

- Employment development is classified as ‘less vulnerable’ development in the NPPF’s flood risk vulnerability classification; and, the employment proposed by the site (as the FRA which accompanies the planning application demonstrates) can be accommodated within the site using only land that is Flood Zone 1, and avoiding areas most at risk of surface water flooding (i.e. the element of the site around Sandon Brook) (Pigeon (Sandon) Ltd PS25-238)
- Significant level of flood risk, in relation to river and reservoir flooding. As a result, to proceed to allocation, the site must pass the flood risk sequential and exemption tests, and little evidence has been presented to explain how the harm will be mitigated. The Sequential and Exception Test process has been completed by the Council but does not appear to address the core requirements of the NPPF. The implications for the new community and the surrounding areas do not appear to have been properly considered, and alternative options have not been fully explored. Instead, the issue has essentially been put ‘on hold’, for consideration when the major development comes forward, and this is not a rational or justified strategic approach, and is contrary to the requirements of the NPPF (see submitted Flood Risk Statement) (Little Baddow, Boreham, Danbury & Sandon Parish Council

Cross Working Group PSQ25-6187, PSQ25-6179, PSQ25-6181, PSQ25-6188)

- The development site abuts the Chelmer and Blackwater valley. Flood risk mapping shows that parts of the proposed site regularly flood, particularly after heavy rainfall. Without substantial flood defences, development will exacerbate runoff into vulnerable areas downstream
- Climate change is increasing the severity of flood events, yet the Plan does not account for this risk. Existing flood models used in the Plan fail to factor in increased climate-driven rainfall and surface water risks. Building in a flood-prone area increases risks to property, infrastructure, and emergency response capabilities
- Flooding has always been a problem and every Winter, including 2024/2025, this is increasing, inevitably with the impact of Climate Change the situation will worsen (Little Baddow Society PSQ25-3251, Boreham Conservation Society PSQ25-5259)
- Building on the site will alter water runoff patterns, increasing the risk of flooding in surrounding areas. Paving over permeable land will increase surface water runoff, overwhelming local drainage systems. The risk of downstream flooding in Boreham, Hatfield Peverel, Langford, Ulting and Maldon will rise significantly because of this development (Langford and Ulting Parish Council PSQ25-734, Boreham Conservation Society PSQ25-5259)
- The development will exacerbate flooding in the Chelmer valley, and it is not clear how sewage and waste-water from the development will be effectively dealt with. There is clearly a danger that increased flooding and waste-water discharge from a major housing development will adversely affect water quality and biodiversity in the Chelmer and its tributaries (Chelmer Valley Landscape Group PSQ25-5145)

Infrastructure

- Support the provision of pedestrian, cycleway connections within the site and the wider area, the provision of a coherent network of new and accessible open space, sport, leisure and recreation facilities within the site (Sport England PS25-90)
- The proposed link road to A12 Junction 19 will be elevated above the flood plain and its embankments will slow down discharge of surface water increasing the risks of flooding up stream, it will split any proposed development in two, and compromise the views to and from the Listed Boreham House, and its separately listed grounds (Boreham Conservation Society PSQ25-5259)

Other

- At the time of the adopted Plan the A12 was regarded as the eastern boundary of the Chelmsford's built-up area and would not be extended beyond that. Nothing has changed to consider this location for development now (Boreham Conservation Society PSQ25-5259)
- The site is fundamentally unsustainable, and it is detached from the main urban area by the A12. Creating safe and welcoming linkages across the A12

from this location will be physically challenging to achieve, given the extent of existing dual carriageway and slip roads in the vicinity of the site (Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group PSQ25-6179, PSQ25-6181, PSQ25-6188)
- Developing beyond the A12 boundary sets a precedent for further development in the future on areas of land which are sensitive landscapes
- Other land would be more suitable for such development and other reasonable alternatives have not been fully identified or assessed (Boreham Conservation Society PSQ25-5259)
- Other options, such as further development at Noth East Chelmsford, have not been properly considered. The Issues and Options consultation saw five options, all of which saw an additional 3,000 homes in North East Chelmsford. When the Council was ahead of the housing target numbers North East Chelmsford was dropped and Location 16 taken forward instead
- North Chelmsford is an already urbanised area, with little in terms of landscape and wildlife of any interest. Meanwhile in Little Baddow and Danbury we have a mix of rural, good quality farmland and woodlands that are managed and preserved by The National Trust and Essex Wildlife Trust. The Plan will destroy the attractiveness of the area and put unsustainable pressure on the wildlife in the area. It has not been properly justified why North East Chelmsford is not being included for further development instead of Location 16

Changes requested

- The policy cites “Flood risk assessment” as an infrastructure requirement, but it is worth noting that it is not infrastructure but is a mandatory supporting evidence base to a planning application, so the wording of the policy needs to be corrected and perhaps replaced with “Flood Risk Management infrastructure” (Environment Agency PSQ25-629)
- No need for a masterplan on this site as the site is in single ownership, there are no land assembly challenges, complex constraints or infrastructure requirements that cannot be readily addressed through the usual planning application process. A masterplan for this site will add unnecessary delay and cost to delivery (Pigeon (Sandon) Ltd PS25-238)
- The policy wording relating to the use classes on site should be amended to make it clear that any mix of the listed use classes is acceptable, and that not all listed are required (Pigeon (Sandon) Ltd PS25-238).

<u>Location 10 – South Woodham Ferrers</u>

<u>Strategic Growth Site Policy 10 – North of South Woodham Ferrers</u>

Consultation point	**Total number of responses**
Strategic Growth Site Policy 10 – North of South Woodham Ferrers	12

Summary of Representations – main issues and requested changes:

- Support for additional wording relating to a strategy for responding to National Grid Electricity Transmission plc (NGET) overhead transmission lines (National Grid Electricity Transmission PSQ25-6236)
- Welcome reference to the masterplanning principle to provide or make financial contributions to new or enhanced sport, leisure and recreational facilities as justified by the Council's emerging evidence base, other plan polices and NPPF (Sport England PS25-91)
- Para 7.412 - welcome reference to the development being required to encourage healthy and active lifestyles in line with the Active Design guidance. Update the text to reflect that Public Health England no longer exists (Sport England PS25-91)
- Pleased to see that the requirement for a Habitats Regulations Assessment (HRA) but note that the requirement for HRA will be required for all residential applications within the Essex Coast RAMS and other proposed developments which may have a likely significant effect on international sites (Natural England PSQ25-6254)
- Support requirements for developments to demonstrate sufficient capacity for wastewater treatment and disposal to serve the site. As outlined in the Water Cycle Study Stage 2, the dry weather flow will be exceeded at the South Woodham Ferrers water recycling centre (WRC) based on the proposed growth and current headroom is very limited. However, the Anglian Water PR24 Business Plan identified a growth scheme at South Woodham Ferrers WRC for AMP8 to enable growth to come forward (Anglian Water Services Ltd PSQ25-6406)
- Para 7.405 – concerned that if 21/01961/OUT is not implemented and a new proposal comes forward, the site capacity will be considered on its individual merit making the housing target meaningless (South Woodham Ferrers Town Council PSQ25-923)
- Para 7.411 – there is no reasoning for removing the size requirement for the new school or information on the implications of this for the site (South Woodham Ferrers Town Council PSQ25-923)
- Para 7.421 – question how it can be ensured that the Essex RAMS contributions from the site are directly used to mitigate impacts on our local habitat sites (South Woodham Ferrers Town Council PSQ25-923)
- Delete the site. It has not delivered any homes in line with the trajectory in the adopted Local Plan (May 2020) and is demonstrably undeliverable. The site still does not have a signed s106 agreement or a formal decision notice, around two years after the resolution to grant permission. Plan should allocate additional sites and/or 'reserve' sites to ensure the plan can handle changing circumstances (Croudace Homes PS25-359)
- Add an additional bullet under 'Site infrastructure requirements' in line with the ECC Developers' Guide to read: Financial contributions to primary, secondary, early years education and childcare, including SEND education as required by the Local Education Authority (Essex County Council PS25-227)
- Support for the allocation and policy objectives overall but the policy should have generic requirements, rather than being 'tied in' to the development covered by the recent application with a resolution to grant planning permission (Ref: 21/01961/OUT) (Vistry Group PS25-132)

- It would be expedient to acknowledge that the assessment of infrastructure delivery will consider viability considerations (Vistry Group PSQ25-6499)
- Amendments proposed to individual site criteria to remove superlative language and ensure CIL compliant requirements:
    - Opening para of policy - amend to “promote” or “encourage” opportunities for active and sustainable travel as “maximise” means that this must take precedence over every other material consideration
    - Opening para of policy - amend to state that “Development proposals should generally accord with the Masterplan Framework approved by the Council in 2021, or any subsequently approved revised Masterplan”
    - Amount and type of development - amend to require “around” 1,220 new homes and “around 1,000 sqm of business floorspace” (in line with the resolution to grant permission)
    - Amount and type of development - show the housing quantum as a range of 1,200 to 1500 homes to maximise the site potential
    - Site masterplanning principles 9th bullet and Site infrastructure requirement 10th bullet point - an on-site car club facility is unreasonable and fails to meet the CIL Regulations
    - Site masterplanning principles 10th bullet and Site infrastructure requirement 2nd bullet – delete references to “as required by the Local Highways and Transportation Authority” as this is not the correct basis for determining CIL compliant mitigation
    - Site infrastructure requirement 8th bullet – it is unreasonable to place the onus for demonstrating sufficient capacity in the foul drainage network on individual developers at the application stage
    - Site infrastructure requirements 11th bullet - current wording does not provide any clarity or measure as to what is required for sport and leisure
    - Site infrastructure requirements 12th bullet - financial contributions to secondary education would only be required sufficient to mitigate any adverse impact on school places, and not “as required by the Education Authority”
    - Site infrastructure requirements 13th bullet - amend requirement for community facilities to refer to an on-site community building (or equivalent), as required under the recent application. Amend reference to refer to a proportionate healthcare commuted payment and delete "as required by". The recent application shows no evidence of the need for such matters (Vistry Group PS25-132).

<u>Location 11 – Bicknacre</u>

<u>Growth Site Policy 11b – Land at Kingsgate, Bicknacre</u>

Consultation point	**Total number of responses**
Growth Site Policy 11b – Land at Kingsgate, Bicknacre	49

Summary of Representations – main issues and requested changes:

- We welcome the policy requirement to assess, and where appropriate mitigate, the potential cumulative effect on the designated features of Thrift Wood SSSI (Natural England PSQ25-6255)
- We welcome the inclusion of heritage criteria in the policy. The site is near Bicknacre Priory Scheduled Monument. Having reviewed the HIA, we are satisfied that the Council has appropriately assessed the potential impacts of development on the historic environment and identified a suitable range of mitigation measures to address them effectively (Historic England PSQ25-5812)
- Site falls within the Eastern 2 Wide Area Multilateration Network statutory safeguarding zone meaning any development of, or exceeding, 91.4m in height above ground level will trigger a statutory consultation requirement (Defence Infrastructure Organisation (DIO) PSQ25-6410)
- Support allocation but capacity studies suggest 25-35 dwellings is achievable on the 1 Ha site – site policy should be amended accordingly (Kingsbury PS25-180)
- For clarity, amend para 7.433 to state: 'Land to the west of the site is allocated for future 'recreation use' SUDs/biodiversity to serve the site, as shown on the Policies Map.' (Kingsbury PS25-180)
- Object to the allocation. Bicknacre has already satisfied its requirement for further housing since the adoption of the existing Local Plan (2020) and we are discussions to find an affordable housing site. Any further housing need could be accommodated at Hammonds Farm or elsewhere. Concerns about flooding, drainage capacity and loss of Grade 3 agricultural land. Additional homes built on Growth Site 11 in the Adopted Local Plan should be deducted from the overall requirement in Bicknacre (Woodham Ferrers and Bicknacre Parish Council PSQ25-1439)
- To meet the increased housing requirement, additional growth should be considered in Bicknacre (Gladman Developments Ltd PSQ25-6322)
- Insufficient infrastructure to support the development, including lack of public transport, police and fire services, the condition of roads and capacity at doctors' surgery and the school
- Will place further strain on existing facilities and utilities
- Increase in traffic, congestion and on street parking and the degradation of the condition of existing roads – concerns on pedestrian and road safety and quality of life
- Bicknacre has already had too much housing and there is sufficient housing to meet local need
- Impact on settlement character, loss of village status, environment, settlement boundary and the community
- Concerns on flooding, including Sandon Brook overflowing
- Drainage issues/lack of capacity and sewerage concerns
- Loss of agricultural land, heritage and culture
- Adverse impact on community spirit
- Impact on wildlife and their habitats/corridors and lack of environmental surveys e.g. bats and newts
- Noise and air pollution impacts – Chelmsford's Air Quality Strategy June 2022 is out of date and air pollution is likely to increase
- Concerns on pedestrian safety, including children and the vulnerable and the lack of/suitable existing footways within the village

- The IIA says 21SHELAA94 would result in back land development and performs less well to the preferred sites when compared to the Spatial Strategy
- Impact on adjacent bridleway
- Concerns on antisocial behaviour
- Traffic, congestion, noise, light and road safety concerns during the construction phase of the development
- Mental wellbeing impacts
- Contravenes the European Convention of Human Rights Article 8 - right to respect for your family and private life
- Past planning proposals state that the land will be retained for agricultural or grazing
- Site is within the Danbury Ridge Conservation Zone which is an area of special scientific interest the Council is committed to protect
- Focus development instead in under-used urban areas
- Loss of privacy and amenity
- Will be overdevelopment
- The Protection of Garden Land (Development Council) Bill is intended to 'protect private gardens from development which is out of character with the surrounding area'
- MP and Parish Council both oppose the development.

Growth Site Policy 11c – Land West of Barbrook Way, Bicknacre

Consultation point	**Total number of responses**
Growth Site Policy 11c – Land West of Barbrook Way, Bicknacre	126

Summary of Representations – main issues and requested changes:

- We welcome the policy requirement to assess, and where appropriate mitigate, the potential cumulative effect on the designated features of Thrift Wood SSSI (Natural England PSQ25-6256)
- Support allocation and policy, but the wider SHELAA submission site can accommodate a higher amount of growth which has not been assessed as a reasonable alternative in the IIA or wider plan evidence base. This would support the vitality of existing services and facilities (Welbeck Strategic Land V Limited PSQ25-3091)
- Object to the allocation. Additional homes built on Growth Site 11 in the Adopted Local Plan should be deducted from the overall requirement in Bicknacre. Further housing in Bicknacre has already been satisfied since the adoption of the existing Local Plan (2020) and we are in discussions to find an affordable housing site. Any further housing need could be accommodated at Hammonds Farm or elsewhere. Concern on flooding, drainage capacity and loss of Grade 3 agricultural land. There is a ransom strip between Barbrook Way and the site making it undeliverable. The site will have an amber designation in the updated SHELLA meaning it is undeliverable and undevelopable so should be deleted (Woodham Ferrers and Bicknacre Parish Council PSQ25-1441)

- Insufficient infrastructure to support the development, including lack of public transport, police and fire services, the condition of roads and capacity at doctors' surgery and the school
- Will place further strain on existing facilities and utilities
- Will seriously devalue nearby houses
- Site has restrictive covenants on two strips of land – one restriction lasting until 8 June 2041 that no disposition of the registered estate can occur without signed certificates by the three previous owners
- Bicknacre has met its housing requirement with circa. 77 new homes being built/under construction and further affordable housing may be delivered – the village does not need more housing to meet local needs
- Increase in traffic, congestion and on street parking and the degradation of the condition of existing roads – concerns on pedestrian and road safety and quality of life
- Barbrook Way is an unsuitable entrance for any future developments
- Impact on settlement character, loss of village status, environment, settlement boundary and the community
- Concerns on flooding, including Sandon Brook overflowing
- Drainage issues/lack of capacity and sewerage concerns
- Loss of Grade 3 agricultural land – the site has always been used for animal grazing
- Loss of heritage and culture
- Adverse impact on landscape
- Impact on wildlife and their habitats/corridors and lack of environmental surveys e.g. bats and newts
- Disagree with the site's rating (CFS158) in the Strategic Housing and SHELAA – it has been incorrectly scored and should be lower
- The IIA says CFS158 would result in back land development and performs less well to the preferred sites when compared to the Spatial Strategy
- Adverse impact on community spirit
- Impact on neighbour amenity, privacy and loss of views from properties
- Impact on adjacent bridleway
- Contrary to Policy DM8
- Insufficient demand for homes – recently built new homes remain unsold
- Developers are promoting the site for potentially 250 dwellings contrary to the plan
- Concerns about antisocial behaviour and increased crime
- Traffic, congestion, noise, light and road safety concerns during the construction phase of the development
- Junction/road safety concerns, including the location of the drop off point of Sandon School bus at Barbrook Way/Priory Road
- Noise and air pollution impacts – Chelmsford's Air Quality Strategy June 2022 is out of date and air pollution is likely to increase
- Concerns on pedestrian safety, including children and the vulnerable and the lack of/suitable existing footways within the village
- There is a ransom strip at the entrance at the site – the site is not deliverable
- Land contributes to community wellbeing

- There is a water main running through the site – homes cannot be built on this or within its easements
- There is cable running under the access in contract with UK Power
- Concerns for protected trees within and near the site
- Concerns over heritage impacts
- Traffic, congestion, noise, light and road safety concerns during the construction phase of the development
- The alternative sites access would require a long road from the north across two fields, which would not be viable
- Appropriate and sustainable travel connections as stated in para 7.437 would not be achievable due to poor access
- Land has always been a major part of the local drainage system
- Contravenes the European Convention of Human Rights Article 8 - right to respect for your family and private life
- Would be overdevelopment
- Concerns over subsidence impacts on existing dwellings
- Archaeological assessments have not been done
- Select alternative sites available with less impact e.g. in North Chelmsford
- Would affect mental wellbeing and quality of life of existing residents
- Past planning proposals state that the land will be retained for agricultural or grazing
- The site is within the Danbury Ridge Conservation Zone which is an area of special scientific interest the Council is committed to protect
- The Protection of Garden Land (Development Council) Bill is intended to 'protect private gardens from development which is out of character with the surrounding area'
- MP, City Councillor and the Parish Council all oppose the development
- Should consider the developers' alternative entrances or field forming CFS158
- Unclear why less growth is promoted at North Chelmsford compared with the Issues and Options consultation document
- Concerns over car parking on nearby roads
- Concerns over consultation process and lack of awareness locally - portal is not user friendly and creates significant barriers to public participation
- No response received to the SHELAA rating question to Chelmsford Policy Board on 16 January 2025.

Location 12 – St Giles, Bicknacre

Growth Site Policy 12 – St Giles, Moor Hall Lane, Bicknacre

Consultation point	**Total number of responses**
Growth Site Policy 12 – St Giles, Moor Hall Lane, Bicknacre	2

Summary of Representations – main issues and requested changes:

- Support the allocation (Woodham Ferrers & Bicknacre Parish Council PSQ25-6491)
- We welcome the policy requirement to assess, and where appropriate mitigate, the potential cumulative effect on the designated features of Thrift Wood SSSI (Natural England PSQ25-6257).

Location 13 – Danbury

Strategic Growth Site Policy 13 – Danbury

Consultation point	Total number of responses
Strategic Growth Site Policy 13 – Danbury	6

Summary of Representations – main issues and requested changes:

- Welcome the policy requirements to conserve and enhance SSSIs and the expected partnership working with managers of the SSSIs and other key stakeholders (Natural England PSQ25-6258)
- Ministry of Defence (MOD) Safeguarding criteria would apply in relation to renewables development such as power lines or wind generation at specified heights on sites within this policy (Defence Infrastructure Organisation PSQ25-6411)
- Impacts on the SSSIs and Ancient Woodlands should be assessed at the Local Plan stage and scale, rather than for individual planning applications, so that cumulative impacts and mitigation can be adequately assessed (National Trust PS25-172)
- Suggest policy text amendment relating to site infrastructure requirements to include financial contributions towards other community facilities including healthcare provision as required by the NHS Mid and South Essex Integrated Care Board and police, ambulance and fire and rescue facilities (East of England Ambulance Service NHS Trust PSQ25-5247)
- An additional housing allocation could be made within Danbury to supplement the allocations made within the neighbourhood plan without significantly conflicting with the proposals of that plan (Gladman Developments Ltd PSQ25-6321)
- The policy should be amended to include the allocation of land to the south of Maldon Road, Danbury for a further 185 dwellings to ensure an adequate housing land supply is available (Richborough PS25-314).

Location 17 – East Hanningfield

Growth Site Policy 17a – Land North of Abbey Fields, East Hanningfield

Consultation point	Total number of responses

Growth Site Policy 17a – Land North of Abbey Fields, East Hanningfield	8

Summary of Representations – main issues and requested changes:

- Support the allocation and policy requirements, but a higher quantum of development than 11 dwellings may be possible. The delivery of site could be within two years of the plan adoption (Chelmsford Diocese Board of Finance PSQ25-716)
- The developments are not wholly within the defined settlement
- Impact on local roads and surrounding areas – the village is already an extremely busy 'rat run'
- Despite what is set out in the plan, recent local developments have resulted in very few truly affordable homes
- Impact on landscape
- Loss of good quality agricultural land
- Loss of biodiversity and habitat
- Surface water/flood risks as experienced by existing residents and as set out in the SFRA Level 2 Detailed Site Summary Table (CC010-A) which also rates the site as 'Amber' for flood risk
- Provision for the maintenance of the proposed SuDS must be provided
- Site capacity will be 0.8ha as part is at risk of deep surface water flooding – 11 dwelling will be too high and out of keeping with the existing development
- Inadequate sewerage capacity – this was why previous development was refused
- There is inadequate drainage in the village
- Site is unsuitable for development as it is identified as a Flood Priority Catchment in Anglian Water's Drainage Plan and Wastewater Management Plan (DWMP)
- Lack of integral garages/substantial driveways/ limited parking to comply with Essex Guidelines for Developers will increase roadside parking and be out of keeping with the local area
- Access to the site from Abbey Fields is too narrow to allow a full width road with pavements to provide a safe and adequate access for vehicles, pedestrians and cyclists, and additional land to widen the site entrance is not available
- Housing density will be 80% greater than the current homes contrary to the site policy design and layout requirements
- Impact on/lack of local services including inadequate school capacity and public transport
- Increase/exacerbation of traffic, congestion and on street parking in Abbey Fields and junction/road safety concerns
- Loss of wildlife habitat/impact on biodiversity, trees (including preserved trees) and landscaping
- Noise and pollution impacts
- The consultation process was inadequate, lacking sufficient community engagement and accessibility
- There was no community consultation on this proposal prior to its publication.

Growth Site Policy 17b – Land East of Highfields Mead, East Hanningfield

Consultation point	Total number of responses
Growth Site Policy 17b – Land East of Highfields Mead, East Hanningfield	5

Summary of Representations – main issues and requested changes:

- Support commitment to the allocation not exceeding 1 hectare in size
- Support the proposed area for biodiversity
- The developments are not wholly within the defined settlement
- Despite what is set out in the plan, recent local developments have resulted in very few truly affordable homes
- Development would be contrary to the plan's Strategic Priorities and many Strategic Policies
- East Hanningfield is an appropriate site for further development which would put additional strain on village facilities
- Loss of good quality agricultural land
- Impact on landscape
- Limited existing infrastructure to support the development, including public transport and capacity at doctors' surgery and school
- Development should be required to improvement facilities for children/young people and public transport/bus services and cycle links to other settlements
- Loss of wildlife habitat/impact on biodiversity, landscaping and trees (including protected trees and great crested newts
- Proposal contradicts the council's duty to conserve biodiversity under the NPPF) and the local Biodiversity Action Plan
- Increase in traffic, congestion and on street parking
- Development must include a new pavement along Bicknacre Road and crossing point improvements, traffic calming measures and extensions of the 30mph speed limit
- Concerns on safety of pedestrians and cyclists
- Concerns on flooding
- Inadequate drainage infrastructure and sewerage
- Impact on settlement character
- Impact on neighbour amenity including a loss of privacy
- The consultation process was inadequate, lacking sufficient community engagement and accessibility
- There was no community consultation on this proposal prior to its publication.

Special Policy Areas (SPA)

Consultation point	Total number of responses
Special Policy Areas (paragraphs 7.464-7.465)	4

Policy SPA1 – Broomfield Hospital Special Policy Area	0
Policy SPA2 – Chelmsford City Racecourse Special Policy Area	0
Policy SPA3 – Hanningfield Reservoir Special Policy Area	2
Policy SPA4 – RHS Hyde Hall Gardens Special Policy Area	0
Policy SPA5 – Sandford Mill Special Policy Area	4
Policy SPA6 – ARU Writtle Special Policy Area	3

Summary of Representations – main issues and requested changes:

- Several SPAs are identified for expansion or alterations to road infrastructure. There should be engagement with the Road Policing Team to ensure access for emergency vehicles during the construction and final build stages (Essex Police PSQ25-2667)
- Support SPA rationale. Designate the former BAE Systems site as a SPA to guide its future redevelopment given its unique and historical context and potential need to provide future specialist electronic technology floorspace related to defence. It meets similar criteria to other SPAs within the Green Belt and satisfies the NPPF definition of 'Grey Belt' (Rosehart Properties Ltd PSQ25-3199)
- Propose that the Cranham Road site be allocated as a rural employment area, an extension to Drakes Lane Employment Policy or a Special Policy Area. The site has extant planning permission for employment development and will contribute towards the local economy. The site meets the SPA objectives in para 7.463 and a SPA allocation would provide a clear basis for determining future applications (W & H Marriage & Sons Limited PSQ25-6062)
- SPA3 - support policy approach but expand to include proposals for renewable energy which would reduce reliance on the grid and contribute towards achieving climate change goals (Essex & Suffolk Water PSQ25-5837)
- Remove requirement to show a demonstrable need for a renewable energy scheme as the treatment works is a regulated industry (Essex & Suffolk Water PSQ25-5837)
- SPA3 - delete requirement for very special circumstances for water infrastructure and ancillary development to demonstrable need and be directly associated with the role, function and operation of the operation of the site. The policy should recognise that the treatment works is only a part of the water infrastructure at the site and there is other infrastructure which may need to be upgraded or replaced (Essex & Suffolk Water PSQ25-5837)
- SPA3 - include new text to support, in principle, appropriate proposals including additional infrastructure requirements linking the site to the wider

water infrastructure network, renewable energy and leisure activities to enable proposals benefiting ecological and health considerations to come forward (Essex & Suffolk Water PSQ25-5837)

- SPA3 - we would be pleased to comment early in the application process on the details of avoidance and mitigation measures deemed necessary for proposed developments that may impact on Hanningfield Reservoir SSSI, particularly through recreational disturbance and effects on water quality (Natural England PSQ25-6259)
- SPA5 - support but point out that the new vehicular access to Maldon Road which is considered essential for servicing is no longer supported by SGS3a (Essex Waterways Ltd PSQ25-5219)
- SPA5 - amend policy to be consistent with SGS3a which requires a new vehicular access road to the Country Park with a new pedestrian and cycle bridge connecting the Country Park to Sandford Mill (Hopkins Homes Ltd PS25-261)
- SPA5 para 7.476 - supports the aims for an appropriate mixed use development linked to the Chelmer and Blackwater Navigation. More emphasis should be placed on the re-use and restoration of existing buildings (Chelmsford Rivers and Canal Link group PS25-282)
- Support. The facility is located within Writtle Key Service Settlement and is a leading institution and key driver for the local economy. As such, the plan should provide new housing allocations near the ARU campus (Vistry Group PS25-303)
- SPA6 - support sympathetic improvements to the ARU Writtle site in line with Green Belt policy. The Norwich to Tilbury powerline proposals will have a significant impact on ARU Writtle (Writtle Parish Council PSQ25-460)
- SPA6 - support principle of the SPA but object to any future expansion of ARU Writtle being dependent on the agreement (the meaning of which is not clear) of a masterplan for the campus. Amend wording to require any future planning applications to maintain National Cycle Route 1 which runs through the 'campus' rather than the 'site' as this places an unnecessary burden on ARU (Anglia Ruskin University PSQ25-6214)
- SPA6 - amend policy to require the replacement of existing buildings or structures to 'accord with national Green Belt policy' rather than 'not have a greater impact on the openness and purposes of the Green Belt' to avoid duplication of national policy (Anglia Ruskin University PSQ25-6214).

Protecting and Securing Important Assets

This section of the consultation document provides other non-strategic policies of the Local Plan that will shape Chelmsford's development opportunities whilst protecting its important physical attributes.

Securing the right types of homes

Consultation point	Total number of responses
Para 8.1	1
Policy DM1	17

– Size and Type of Housing	
Policy DM2 – Affordable Housing and Exception Sites	9
Policy DM3 – Policy DM3 – Gypsy, Traveller and Travelling Showpeople Sites	4

Policy DM1 – Size and Type of Housing

Summary of Representations – main issues and requested changes:

- An additional Development Management policy is proposed to address farm diversification and rural business development to align with the NPPF (Elteam Ltd PSQ25-5465)
- Support 35% affordable housing but provision should be made to enable residents to have priority for such accommodation, for disabled living homes and bungalows, and an appropriate housing mix for the entire community (Chelmsford Garden Community Council PSQ25-4957)
- Expand Part B (i) to require Passivhaus or BREEAM Excellent (East of England Ambulance Service NHS Trust PSQ25-5249)
- If the demand for self-build has been met through windfall delivery, the 5% requirement should be reduced or removed (Home Builders Federation PSQ25-5476). Policy should set out when self-build plots required through the policy would return to the developer for market housing if not sold (Home Builders Federation PSQ25-5476, Gladman Developments Ltd PSQ25-6324)
- Each type of accommodation will have changing requirements over the plan period and at the decision-making stage of development proposals it is essential that these can be achieved and do not impact the overall viability of the development (Higgins Group PSQ25-5628)
- Delete reference to a required number of dwellings and substitute the words ‘encourage’ and ‘engage’ to align with the PPG. Focusing solely on the local housing need requirement when determining how much self-build is appropriate is not consistent with other factors that affect delivery of self-build including viability. There is no evidence for the 30 and 100 dwelling thresholds. The reasoned justification does not explain why 100 dwellings is an appropriate policy threshold (Croudace Homes PSQ25-6049)
- Part D - although the residential strategic growth sites will need to provide specialist housing this will unlikely meet needs in full so additional allocations are needed (Mrs Mary Rance PSQ25-6497)
- Support requirement for 50% of new dwellings to be constructed to M4(2) standards. Part C requirement for self-build homes and specialist residential accommodation should apply to developments over 100 homes on strategic greenfield sites and is unachievable in high density urban locations and apartment typologies (Dominus Chelmsford Limited PSQ25-6206)
- Support expressed for policy and table 4 but it must remain flexible to change over the plan period e.g. in response to Building Regulations. Include table 4 in the policy if it will be used to determine the housing mix of new developments and amend to percentiles to allow for a mix which is reflective

of the specific settlements. The text should refer to the latest SHNA (Dandara PSQ25-6298)

- A dedicated policy for older persons housing is required to meet evidenced significant demand – a suggested policy is proposed. Concerns over the robustness of the 2023 viability assessment which should be re-run using recommended assumptions for sheltered and extra-care housing. Disagree with the PGG in that the viability of specialist older people's housing is considered at the development management stage (Churchill Living and McCarthy Stone PSQ25-6330
- Support appropriate accommodation for older people justified by local housing need. Further clarification is required on the definition/scope of 'Older Persons accommodation' and its application through the Planning Obligations Supplementary Planning Document. Amend Part D to require 'up' to 10% of market housing to be provided for Older Persons, 'taking account of local housing needs.' (Chelmsford Garden Community Consortium PSQ25-6352, Vistry Group PSQ25-6379)
- Part C - amend "taking account of local need" to "taking into account evidence of local need provided either by the applicant or by the City Council and relevant partners" to ensure identifying need is not the sole prerogative of CCC (Vistry Group PS25-141)
- Part D – policy fails to define "Older Persons" and explain the overlap between the requirements for 5% M4(3) properties, for a proportion of affordable housing, and for an element of Specialist Residential Accommodation, and the 10% for "older persons". The policy ignores that 'older persons' may seek a house identical to a younger person's house limiting the ability of housebuilders to provide market housing that meets demand. Remove Part D in the absence of any justification/explanation (Vistry Group PS25-141)
- Para 8.16 states the Council will refer to the latest assessments of housing need. This will also be informed by the Supported and Specialist Housing and Accommodation Needs Assessment' commissioned by ECC Adult Social Care expected to be completed in Spring 2025. ECC will work with CCC to determine how the findings of the assessment can inform other documents, such as the Planning Obligations SPD and future planning application responses (Essex County Council PS25-234)
- Support policy but give stronger support to Build to Rent, to fully comply with national guidance on properly assessing the needs of those who want to rent and reflect the demand for rented homes and the benefits of delivery of this tenure. Expand para 8.6 to refer to the SHNA and where viable, the inclusion of Build to Rent as part of a wider housing mix (Wates Developments and Hammonds Estates LLP PS25-327)
- Support Part D in principle but this should be an aim rather than a fixed target and subject to local housing demand assessed at the time of the planning application. Expand Part D) (i) to require 10% "subject to an assessment of local housing demand" (Wates Developments and Hammonds Estates LLP PS25-327)
- Housing policies should reference the Co-Living Housing Advice Note or include allowances and flexibilities for co-living accommodation to come forward where it otherwise complies with the Advice Note. The Housing Topic

Paper should also reference the Advice Note (Highgate Capital Limited PSQ25-5331)
- Allocate a co-living site in Chelmsford City Centre (Highgate Capital Limited PSQ25-5331)
- Unclear which viability assessment has considered the cumulative impact of the plan polices as there are differences in the inputs and outputs of each e.g. for DM31 and DM25. A list of differences and the reasons is required to show that the plan is deliverable. Some of the costs are too high e.g. the sales values of affordable rented housing and the value of S106 affordable homes. Other costs are too low e.g. delivering BNG and meeting policy DM31. Further viability work should be undertaken (Home Builders Federation PSQ25-5477).

Policy DM2 - Affordable Housing and Exception Sites

Summary of Representations – main issues and requested changes:

- Support expressed for policy (Croudace Homes PSQ25-6050, Dandara PSQ25-6299)
- To better align with the NPPF and enhance flexibility, amend parts B and D to allow a higher proportion of market housing where justified by a viability assessment (specific wording proposed) (Elteam Ltd PSQ25-5460)
- The viability profile of developments will change over the plan period and will need to be balanced alongside other policy requirements and costs such as biodiversity net gain (Higgins Group PSQ25-5629)
- A “one-sized fits all” policy discourages a brownfield first approach. Policy should include a reference to the Vacant Building Credit (Dominus Chelmsford Limited PSQ25-6207)
- Flawed assumptions underpin the Council’s viability assessment and the evidence base for the conclusions on Build to Rent in para 8.3 are unsound (Dominus Chelmsford Limited PSQ25-6207)
- No guidance is provided on “comprehensive review mechanism” in part A which can be a disincentive to developers including bank finance (Dominus Chelmsford Limited PSQ25-6207)
- There are barriers to securing delivery of rural small-scale affordable housing schemes (see Braintree Issues and Options Consultation Document, 2025), so larger site allocations could be more favourable (Dandara PSQ25-6299)
- The housing requirement is unjustified as drafted, so the Viability Assessment must consider whether the plan is viable against the requirements of the NPPF 2024 (Gladman Developments Ltd PSQ25-6325)
- There is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings as well as providing specific provision of older persons housing. Higher M4(2) and M4(3) requirements are proposed whilst maintaining flexibility in the policy. Requiring 35% affordable housing from older persons housing development is not justified. Concerns over the robustness of the 2023 viability assessment which should be re-run using recommended assumptions for sheltered and extra-care housing (Churchill Living and McCarthy Stone PSQ25-6329)

- Amend policy to require 35% affordable housing 'subject to viability' so the policy would not undermine the delivery of the plan (Vistry Group PSQ25-6386)
- The increasing affordability ratio and gross historic under delivery of affordable housing justifies provision of a 20% supply buffer above the minimum housing figure. Plan should allocate more small-medium site allocations which could deliver affordable homes quicker than bigger sites. (Richborough PS25-174)

Policy DM3 – Gypsy, Traveller and Travelling Showpeople Sites

Summary of Representations – main issues and requested changes:

- Welcome reference to protecting the Green Belt (Writtle Parish Council PSQ25-461)
- In line with planning policy, any future provision should be outside this Parish as there is already existing substantial provision within this Parish (Chelmsford Garden Community Council PSQ25-4952)
- Requirement to meet all 10 criteria is unworkable. Some of the language needs to be tempered and/or clarified including for proposals to 'have no adverse impact'. Add "significantly" before "adverse impact" in criterion (ii) and (vi). Add "normally" before "considered appropriate within the Green Belt or Green Wedge" in para 8.50 to be consistent with national policy guidance (Mr D Bibby and Family and Colleagues PSQ25-6357, PSQ25-6358).

Securing Economic Growth

Consultation point	**Total number of responses**
Policy DM4 – Employment Areas and Rural Employment Areas	2
Policy DM5 – Designated Centres	0

Policy DM4 – Employment Areas and Rural Employment Areas

Summary of Representations – main issues and requested changes:

- The employment and sustainability policies are potentially incongruous. A small-scale alteration to the Green Wedge/Green Belt boundary should be considered and an extension to the Employment Area allowed at Robjohns Road, Rodney Way in line with national policy (Saxtons 4x4 PSQ25-6109)
- Remove the Employment Area designation from the western part of the former Kay-Metzeler site (SGS1x in the Preferred Options Consultation Document) and allocate it for residential and commercial development. This could form part of 'New Street to Anglia Ruskin University' Opportunity Corridor (HEVF Self Storage UK Limited PSQ25-6338).

Policy DM5 – Designated Centres

No main issues

Protecting the Countryside

Consultation point	Total number of responses
Policy DM6 – New Development in the Green Belt	8
Policy DM7 – New Buildings and Structures in the Green Wedge	7
Policy DM8 – New Buildings and Structures in the Rural Area	4
Policy DM9 – Infilling in the Green Belt, Green Wedge and Rural Area	2
Policy DM10 – Change of Use (Land and Buildings) and Engineering Operations	0
Policy DM11 – Extensions to Existing Buildings within the Green Belt, Green Wedge and Rural Area	0
Policy DM12 – Rural and Agricultural/Forestry Workers' Dwellings	0

Policy DM6 – New Development in the Green Belt

Summary of Representations – main issues and requested changes:

- Policy needs to follow the 2024 NPPF (J & T Wardrop and the Wardrop Trust) including in relation to previously developed land and affordable housing need (Hill Residential Ltd PS25-381)
- The policy replicates the 2023 NPPF. Update to reflect the 2024 NPPF to avoid uncertainty and ambiguity for decision makers - see the emerging West Suffolk Local Plan as an example (Chelmsford City Football Club PS25-215)
- Policy provides no detail on the level or scale of development acceptable within the Green Belt and limits infill opportunities (Higgins Group PSQ25-5630)
- Amend the Green Wedge/Belt to extend the western boundary of Robjohns/Widford Employment Area. This site has limited value in the openness of the Green Belt, is inconsistent with the Green Wedge criteria and conflicts with Policy DM4. The employment extension could support growth in this sustainable location, with existing transport and pedestrian links (Saxtons 4x4 PSQ25-6110).

Policy DM7 – New Buildings and Structures in the Green Wedge

Summary of Representations – main issues and requested changes:

- Support the policy which clarifies that utility infrastructure including water recycling and treatment sites is appropriate within the Green Wedge (Anglian Water Services Ltd PSQ25-6393)
- Support in principle but it is too restrictive on development in the Green Wedge. Amend Para 8.87 to allow consideration of harm to the openness, role and / or function of landscapes on a case-by-case basis (Chelmsford City Football Club PS25-218)
- Para 8.92 – it is unclear what is meant by 'regional centre' type facilities and restricting development to 'local' community facilities in unjustified (Chelmsford City Football Club PS25-218)
- Policy is overly restrictive without a detailed assessment to ensure land within the Green Wedge performs its intended purposes. A more positive approach to sustainable development is needed to realise the Green Wedge objectives (Mr J Bolingbroke PSQ25-5521)
- Unclear why a residential development must meet Part A in addition to demonstrating that it would not conflict with the purposes of the Green Wedge (Mr J Bolingbroke PSQ25-5521)
- Questions the need for the policy as less restrictive planning policies can protect the open countryside. Undertake a Green Wedge Review to allow growth in sustainable locations which protect Green Wedge purposes including in Broomfield (Obsidian Strategic Asset Management Ltd PSQ25-5713)
- The Green Wedge seems to be afforded the same level of protection as Green Belt although it is a local spatial designation more steered towards landscape, environmental attributes and public accessibility rather than openness. Allocate sites/amend the designation for land which does not perform strongly against Green Wedge functions (The Bucknell Family PS25-293)
- Amend policy to support higher employment and housing growth, including addressing unmet housing needs of neighbouring authorities. The IIA has failed to properly assess all sites within the Green Wedge (The Bucknell Family PS25-293)
- The current approach to the DSB is overly reliant on arbitrary boundaries which does not feature in the NPPF. Rather than stifling growth in a Key Service Settlement, a flexible, sustainable outlook could be adopted. This would enable contribution on merit for deliverable well connected sustainable sites including in Great Leighs (Mrs Helen Sadler PS25-58, PS25-59)
- Alternative strategies and new/expanded site allocations promoted by landowners/developers.

Policy DM8 – New Buildings and Structures in the Rural Area

Summary of Representations – main issues and requested changes:

- Policy should allow development of regional scale community facilities (Chelmsford City Football Club PS25-219)
- The current approach to the DSB is overly reliant on arbitrary boundaries which does not feature in the NPPF. Rather than stifling growth in a Key Service Settlement, a flexible, sustainable outlook could be adopted. This would enable contribution on merit for deliverable well connected sustainable sites including in Great Leighs (Mrs Helen Sadler PS25-56).

Policy DM9 – Infilling in the Green Belt, Green Wedge and Rural Area

Summary of Representations – main issues and requested changes:

- Policy is overly restrictive and contrary to the 2024 NPPF making it unclear for decision-makers. Also unclear how a decision-maker will determine if a gap is 'small' (Mr J Bolingbroke PSQ25-5522)
- Amend the Green Wedge/Belt to extend the western boundary of Robjohns/Widford Employment Area. This site has limited value in the openness of the Green Belt, is inconsistent with the Green Wedge criteria and conflicts with Policy DM4. The employment extension could support growth in this sustainable location, with existing transport and pedestrian links (Saxtons 4x4 PSQ25-6111)
- Alternative strategies and new/expanded site allocations promoted by landowners/developers.

Policy DM10 – Change of Use (Land and Buildings) and Engineering Operations

No main issues

Policy DM11 – Extensions to Existing Buildings within the Green Belt, Green Wedge and Rural Area

No main issues

Policy DM12 – Rural and Agricultural/Forestry Workers' Dwellings

No main issues

Protecting the Historic Environment

Consultation point	**Total number of responses**
Policy DM13 – Designated Heritage Assets	2
Policy DM14 – Non-Designated Heritage Assets	3
Policy DM15 - Archaeology	1

Policy DM13 – Designated Heritage Assets

Summary of Representations – main issues and requested changes:

- Supports policy (Historic England PSQ25-5816)
- Acknowledges the importance of Chelmsford heritage assets. Heritage indirectly features within designing out crime in many respects (Essex Police PSQ25-2668).

Policy DM14 – Non-Designated Heritage Assets

Summary of Representations – main issues and requested changes:

- Supports policy (Historic England PSQ25-5817)
- Overall agree with the plan proposals. We welcome SP3 and the placing of great weight on the preservation or enhancement of designated heritage assets and their setting and note that Policy DM14 sets out the approach to non-designated heritage assets (Writtle Parish Council PSQ25-454)
- Acknowledge the importance of Chelmsford's heritage assets. Heritage indirectly features within designing out crime in many respects (Essex Police PSQ25-2668).

Policy DM15 – Archaeology

Summary of Representations – main issues and requested changes:

- Supports policy (Historic England PSQ25-5818).

Protecting the Natural Environment

Key statistics:

Consultation point	**Total number of responses**
Policy DM16 – Protection and Promotion of Ecology, Nature and Biodiversity	10
Policy DM17 – Trees, Woodland and Landscape Features	6
Policy DM18 – Flooding/SUDS	6
Policy DM19 – Renewable and Low Carbon Energy	6

Policy DM16 – Protection and Promotion of Ecology, Nature and Biodiversity

Summary of Representations – main issues and requested changes:

- Support policy and welcome the mitigation measures for impacts on internationally designated sites (Paras 8.139 – 8.140). The Chelmsford Green Infrastructure Strategic Plan, Essex LNRS and Essex Green Infrastructure

Strategy should be considered for development affecting locally designated sites as well (Natural England PSQ25-6260)

- Support in principle the targets for the Garden Community Developments to deliver 20% Biodiversity Net Gain, though this should not invite offsite top-up requirements (Wates Developments and Hammonds Estates LLP PS22-331)
- Expand Part C(ii) to also include 'boundary fencing' to increase biodiversity (East of England Ambulance Service NHS Trust PSQ25-5243)
- Part D(iv) and para 8.145 – to make the policy deliverable and consistent with national policy statements, amend so that the 20% target for the Garden Communities is capped at what is practically deliverable onsite and that offsite top-ups will not be sought (Wates Developments and Hammonds Estates LLP PS22-331)
- Para 8.141 - expand sentence 1 to also refer to the Essex Green Infrastructure Strategy Standards. These standards will facilitate securing multifunctional green infrastructure and are endorsed by Natural England (Essex County Council PS25-235)
- Para 8.143 – welcome but re-order to reference 'swift, bat and bee bricks' first as these unlike 'boxes' are specifically supported by national policy (Swifts Local Network: Swifts & Planning Group PSQ25-3055)
- Para 8.143 – add that existing nest sites for building-dependent species such as swifts should be protected, as these endangered species are declining in Chelmsford. Mitigation should be provided if these nest sites cannot be protected (Swifts Local Network: Swifts & Planning Group PSQ25-3055)
- Clarify that swift bricks are a universal nest brick for small bird species, making them suitable for any development. Add references to best practice guidance, extensions, and to highlight the protection of existing annual nest sites in buildings (Swifts Local Network: Swifts & Planning Group PSQ25-3055)
- Para 8.144 - expand sentence 3 to also refer to the Essex Green Infrastructure Strategy Standards. These standards will facilitate securing multifunctional green infrastructure and are endorsed by Natural England (Essex County Council PS25-236)
- Para 8.147 – for consistency with latest government guidance (DEFRA March 2024) and Natural England's (2021) Guidelines for Creation of SANG, amend last sentence to read 'Mitigation measures for protected sites (including SANG) can count towards BNG requirements as long as at least 10% of the biodiversity units come from additional activities other than mitigation and compensation.' (Wates Developments and Hammonds Estates LLP PS22-331)
- Policy should not refer to BNG requirements as this repeats national policy (Barratt Redrow PSQ25-5169) and Strategic Policy S4 (Dandara PSQ25-6300)
- The requirement for 20% BNG has not been justified in the Council's evidence base as being financially viable or practically deliverable/viable. It should be expressed as a target rather than an absolute requirement (Croudace Homes PSQ25-6054)
- Oppose the 20% BNG requirement on Chelmsford Garden Community which is not justified. Amend to reflect the approved Development Framework Document i.e. a minimum of 10% BNG per phase with an aspiration of 20%

across the site (Chelmsford Garden Community Consortium PSQ25-6341, Vistry Group PSQ25-6364).

Policy DM17 – Trees, Woodland and Landscape Features

Summary of Representations – main issues and requested changes:

- Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland (Natural England PSQ25-6261)
- The Environmental Principles must be treated as a foundational component of the plan which must support the protection of sensitive natural assets, such as ancient woodland; be an exemplar of emerging BNG practice; and set high standards for the retention and provision of trees within developments including preserving a 50 metre buffer between new development and ancient woodland, recording Ancient and Veteran Trees on the Ancient Tree Inventory, and assessing the nitrogen impact of ammonia-emitting developments on ancient woodland within 5km of new development (The Woodland Trust PSQ25-1998)
- The Local Plan should require all developments to deliver 20% BNG and all units to be maintained for at least 50 years to support/enable new woodland creation (The Woodland Trust PSQ25-1998)
- The plan should give strong weight to LNRSs for development site allocations to avoid impacts to existing sensitive natural assets and to inform priority locations for the provision of green infrastructure, and habitat creation/enhancement through BNG (The Woodland Trust PSQ25-1998)
- Plan should set standards for high-quality green infrastructure for development including five UKISG-compliant trees per dwelling or per 1,000m2 of non-residential floorspace on major developments. Everyone should be able to see three trees from their home and be no more than 300 metres from the nearest natural green space, with safe and accessible routes (The Woodland Trust PSQ25-1998)
- Consider our ‘Access to Woodland Standard’ which aspires that everyone should have a small wood of at least two hectares within 500 metres of their home and a larger wood of at least 20 hectares within four kilometres of where they live (The Woodland Trust PSQ25-1998)
- Quality of trees, specimen type and location best dictate tree coverage in a development rather than a stringent quantum. For the Meadows, this would lead to over 2,400 trees which cannot be realistically accommodated. It is unclear why the requirement does not apply to non-residential development (Dominus Chelmsford Ltd PSQ25-6208)
- Generally supportive of policy but question three new trees per dwelling in Part C which could lead to development layouts that do not adhere to best practice urban design principles. The priority should instead be to ensure that developments are appropriately landscaped, with suitable planting, to allow for the creation of beautiful places (Dandara PSQ25-6301)
- Welcome increasing tree cover in principle but amend Part C policy to support/encourage rather than ‘require’ three trees per new house as this is not CIL compliant. Although an aspiration of the Council to achieve higher tree cover, there is no causal link between new housing and climate change which

can be mitigated by the planting of three new trees aspiration (Vistry PSQ25-142)
- Practical, financial and land take implications that arise from Part C have not been properly considered and the requirements will be difficult for all sites to achieve (Vistry PSQ25-142)
- Part C is not clear or effective. For example, “a significant number of new trees” is not defined, it is unclear if the additional trees form part of or are in addition to the 10% BNG requirement and whether they need to be on site, or if they could be offsite (Barratt Redrow PSQ25-5170).

Policy DM18 – Flooding/SUDS

Summary of Representations – main issues and requested changes:

- Support for SuDS throughout the plan (Environment Agency PSQ25-6272)
- General support for the policy (Anglian Water PSQ25-6394, Dandara PSQ25-6302)
- The SuDS guidance in Policy S2 may be best placed under DM18 for improved visibility within the Plan (Environment Agency PSQ25-6272)
- Amend policy to take on board recommendation of the SFRA Level 1, reiterated in the Water Cycle Study Stage 2, to ensure SuDS are incorporated in all new development proposals and not just for major development (Anglian Water PSQ25-6394)
- Amend para 8.167 to clarify the preference for above ground SuDS to enhance amenity, biodiversity, habitats and green areas (Essex County Council PS25-237)
- Add a sentence to the end para 8.167 to refer to rainwater harvesting and the need for development to discharge surface water at the greenfield 1 in 1 rate (Essex County Council PS25-239)
- Requests clarification regards Part B(ii) and (iv), as the requirements are not justified based on the supporting text and evidence base. There is no definition of what is meant by flood risk and hence the circumstances when Part B is triggered (Vistry Group PS25-143)
- Comment from landowners/developer suggesting that their proposed development complies with the policy (Dandara PSQ25-6302).

Policy DM19 – Renewable and Low Carbon Energy

Summary of Representations – main issues and requested changes:

- Supports policy but expand penultimate paragraph to have regard to the relevant tests for planning obligations in the NPPF in relation to community benefits (Infrabee PSQ25-5740, PSQ25-43)
- Amend (iii) to demonstrate no unacceptable ‘significant’ adverse effect in line with NPPF Para 193 (Infrabee PSQ25-5740, PSQ25-43)
- The Environment Agency regulates ground source heating and cooling systems. The system may require an abstraction licence and an environmental permit, or exemptions may apply. Add a reference to our

'Closed loop ground source heating and cooling systems' and 'Open loop heat pump systems' guidance on gov.uk (Environment Agency PSQ25-6273)
- Consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure in future iterations of the Local Plan including around SWF (Infrabee PSQ25-5740, PSQ25-43)
- No objection in principle to any renewable energy development, though some infrastructure by virtue of their physical dimensions and properties, may impact upon military aviation. Planning Practice Guidance provides specific guidance on when to consult the MOD in relation to MOD safeguarding requirements (Defence Infrastructure Organisation PSQ25-6407)
- Nationally, solar farms and battery storage facilities are vulnerable to organised crime groups. It is important that facilities are designed to be safe and secure and that security proposals are risk assessed (Essex Police PSQ25-2674).

Delivering and protecting Community Facilities

Consultation point	**Total number of responses**
Policy DM20 – Delivering Community Facilities	4
Policy DM21- Protecting Community Facilities	3
Policy DM22 – Education Establishments	2

Policy DM20 – Delivering Community Facilities

Summary of Representations – main issues and requested changes:

- Support policy (Dandara PSQ25-6303)
- Welcome policy but amend criterion (i) to allow sustainable transport connections to be delivered as part of the proposed new development (Chelmsford City Football Club PS25-221)
- Support expressed for policy but move criterion (vi) to a separate item and rephrase to encourage flexibly designed spaces where practical, as community facilities may be designed for a specific purpose, making flexibility for other uses impractical or financially unviable (PS25-342)
- Welcome policy which takes a positive approach towards new or extended community facilities which include indoor and outdoor sports facilities as supported by the Council's evidence base and the NPPF (Sport England PS25-92)
- Alternative strategies and new/expanded site allocations promoted by landowners/developers.

Policy DM21 – Protecting Community Facilities

Summary of Representations – main issues and requested changes:

- Welcome policy which will seek to protect sports facilities as supported by the Council's evidence base which identifies deficiencies in the provision of facilities such as playing fields (Sport England PS25-93)
- Support policy in principle but it should be more flexible. Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Local Plan should support the principle of alternative uses with no requirement for retention of a community facility use on the land (NHS Property Services Ltd PSQ25-5601)
- Support expressed for policy but expand Part A to recognise that a facility could be made viable under an alternative operating/ownership model such as community ownership (Theatres Trust PSQ25-357)
- It is imperative that the ongoing use of the allotment site at Princes Road, Chelmsford should be maintained, and any future change of use (due to potential sale of land) should be resisted. Any change of use would increase the area's allotments deficit. It is a green space and wildlife corridor, allotment gardening promotes healthy living, and the allotment association has strong community links (Princes Road Allotment Association PS25-46).

Policy DM22 – Education Establishments

Summary of Representations – main issues and requested changes:

- There is no need for an 'agreed masterplan' with ARU in addition to the Special Policy Areas for ARU Writtle. Amend the policy to support the expansion of ARU in the context of the adopted Local Plan and ARUs own Development Framework to which the Council can contribute. The Council's masterplan procedure does not cover ARU and would be costly, inflexible and fail the need for Plans 'to serve a clear purpose' as set out in para 16 of the NPPF (Anglia Ruskin University PSQ25-6220)
- Para 1.890 – amend reference to the 10 Year Plan to reflect it is regularly updated and provide additional clarification around the redevelopment of independent schools to read: 'The redevelopment of school sites should not be precluded in the event that provision could be enhanced or the area better served by consolidating assets and reinvesting capital receipts.' (Essex County Council PS25-240).

Making High Quality Places

Section 9 - Making Places

Consultation point	Total number of responses
Policy DM23 – High Quality and Inclusive Design	3
Policy DM24 – Design and Place Shaping Principles in Major Developments	5

Policy DM25 – Sustainable Buildings	20
Policy DM31 – Net Zero Carbon Development (In Operation)	15
Policy DM26 – Design Specification for Dwellings	1
Policy DM27 – Parking Standards	3
Policy DM28 – Tall Buildings	4

Policy DM23 – High Quality and Inclusive Design

Summary of Representations – main issues and requested changes:

- Recommends that crime is a material consideration for good design, to ensure new developments are safe and inclusive for all, mitigating the opportunities for crime through building strong, healthy, cohesive, accessible, vibrant, and participatory communities (Essex Police PSQ25-2675)
- Support the aspirations for development that is respectful of the character and appearance of the area; however it is not appropriate to cross-reference Policy DM25 as part of this policy and it is proposed part (b)(vii) is removed (Vistry Group PSQ25-6377)
- The use of words maximise and minimise does not provide clarity of the requirements for new development (Vistry Group PS25-144).

Policy DM24 – Design and Place Shaping Principles in Major Developments:

Summary of Representations – main issues and requested changes:

- Support the policy, and in particular the reference to Sport England's Active Design Guidance (Sport England PS25-94)
- Suggest that the inclusion of 'safe, secure and sustainability' concepts are embedded within the Design and Place Shaping Principles (Essex Police PSQ25-2676)
- Modification suggested to include a reference to development types including boundary fencing in relation to biodiversity (East of England Ambulance Service NHS Trust PSQ25-5244)
- It is important to ensure that there is sufficient distinction on sites between spaces intended for public recreation and those prioritised for wildlife conservation. Additional text suggested for a requirement for native species for all planting and habitat restoration (Environment Agency PSQ25-6275)
- The policy could be improved by providing additional information about when public art will be required to be delivered in major developments, or at least the kind of art that is expected in smaller development (Dandara PSQ25-6304).

Policy DM25 – Sustainable Buildings

Summary of Representations – main issues and requested changes:

- General support for the objectives of the policy (Vistry Group PS25-146)
- As Chelmsford resides wholly in an area of serious water stress the requirement for all new dwellings to achieve a water efficiency standard of 90 litres/person/day or greater is welcome. It is essential that this requirement remains evidence based (Environment Agency PSQ25-6276)
- Support for a water efficiency standard of 90 litres/person/day (Anglian Water Services Ltd PSQ25-6395)
- Given Essex is a seriously water stressed area, reduce the water efficiency standard to 80 litre/person/day. The Water Strategy for Essex (WSfE) recommends Local Plans should set ambitious policies on water efficiency (Essex County Council PS25-241)
- Welcome requirement for non-residential development to achieve full credits for category Wat 01 of BREEAM standards (Essex County Council PS25-241)
- Cross reference to Policy DM18, to require strategic growth areas to incorporate integrated water management measures at a community scale (rainwater/stormwater harvesting and reuse) that to facilitate water reuse in homes for flushing toilets and garden irrigation. This would enable developments to be more water efficient and go beyond a fittings-only based approach to further minimise potable water use (Anglian Water Services Ltd PSQ25-6395)
- Support the need to provide integrated water management techniques to optimise rainwater harvesting on site to minimise overall water consumption and maximise its reuse (Essex County Council PS25-243)
- Challenge the requirement for 90 litres/person/day which is not supported by evidence (Home Builders Federation (PSQ25-5479, Barratt Redrow PSQ25-5171, Croudace Homes PSQ25-6051, Dandara PSQ25-6305, Gladman Developments Ltd PSQ25-6326, CHP PSQ25-2983, Sempra Homes PSQ25-3112)
- The most effective approach to securing long term water efficiency reductions is through nationally agreed regulations not ad hoc requirements in local plans (Home Builders Federation PSQ25-5479)
- A 2023 Ministerial Statement stated that where water scarcity is inhibiting the adoption of Local Plans, local planning authorities should work with the Environment Agency and delivery partners to agree standards tighter than the 110 litres/person/day, this does not appear to be the case in Chelmsford (Home Builders Federation PSQ25-5479, Gladman Developments Ltd PSQ25-6326)
- Retain 110 litre/person/day in line with Building Regulations and the approved Development Framework Document for Chelmsford Garden Community (Chelmsford Garden Community Consortium, PSQ25-6342, Vistry Group PSQ25-6365)
- We normally encourage BREEAM “Excellent” for developments over 1000sqm, but the policy meets our minimum requirements (Environment Agency PSQ25-6276).
- Applying BREEAM to developments under 1,000sqm is unlikely to lead to enhanced sustainability design as the assessment and certification costs for new construction becomes increasingly significant for smaller development.

This can affect the provision of measures which would otherwise enhance the design of the development (Chelmsford Garden Community Consortium PSQ25-6349, Vistry Group PSQ25-6371).

- Remove the 3 water efficiency credits requirement. Smaller development will struggle to meet this which goes beyond requirements for a Very Good BREAAM rating and has not been considered in the updated viability assessment (Chelmsford Garden Community Consortium PSQ25-6349, Vistry Group PSQ25-6371).
- Policy should accord with Building Regulations to allow the most appropriate technologies and techniques to be implemented in all developments (Dandara PSQ25-6305)
- Supports the provision of EV charging points but requirements should accord with Building Regulations. Provision over and above this has not been accounted for within the viability assessment (Chelmsford Garden Community Consortium PSQ25-6343, Vistry Group PSQ25-6366).
- Given the provision of EV charging points in Building Regulations, the policy should be removed or align with Building Regulations (Chelmsford Garden Community Consortium PSQ25-6348)
- Question the need to request EV charging points for residential development given that the relevant standards are set out in Building Regulations (Home Builders Federation PSQ25-5479, Croudace Homes PSQ25-6051, Gladman Developments Ltd PSQ25-6326, Vistry Group PS25-146, CHP PSQ25-2983, Sempra Homes PSQ25-3112)
- Additional guidance may be required for on street/public charging points that is not addressed in Part S of Building Regulations (Home Builders Federation PSQ25-5479)
- The Essex Car Parking Standards (2024) do not justify why more onerous EV standards should apply over Building Regulations requirements and just link back to national policy (Vistry Group PS25-146).

Policy DM31 – Net Zero Carbon Development (In Operation)

Summary of Representations – main issues and requested changes:

- Support the policy. Essex Open Legal Advice Part B – Energy policy prior to local plan adoption advice reconfirms, that nothing in recent government policy or recent case law prevents LPAs from including policies requiring fabric standards and local energy efficiency greater than Building Regulations in either their Development Plan Documents or in SPDs, so long as there is a robust evidence base for such policies (Essex County Council PS25-246)
- The Environment Agency regulates ground source heating and cooling systems. The system may require an abstraction licence and an environmental permit, or exemptions may apply (Environment Agency PSQ25-6274)
- There is no justification to go beyond the December 13th 2023 Written Ministerial Statement, national policy requirements and applying the policy will impact house building timeframes and viability (Vistry Group PS25-145, Newell Properties Development Ltd PSQ25-5052, Barratt Redrow PSQ25-5172, Home Builders Federation PSQ25-5481, Croudace Homes PSQ25-

6052, Anglia Ruskin University PSQ25-6216, Chelmsford Garden Community Consortium PSQ25-6052, Hopkins Homes Ltd PS25-265, Richborough PS25-179, Dandara PSQ25-6306)

- Development should not be required to exceed Building Regulations Part F and L. The Future Homes Standard should be the national approach (Gladman Developments Ltd PSQ25-6327, Hopkins Homes Ltd PS25-265, Richborough PS25-179)
- The policy goes beyond national policy and guidance without evidence to justify the approach towards net zero operational and the use of on-site renewables to provide all (regulated and unregulated) operational energy. In line with the PPG locally set energy performance standards for new housing should not exceed the equivalent of Level 4 of the Code for Sustainable Homes (Croudace Homes PSQ25-6052)
- The policies should not be a requirement but advisory and applied flexibly in a stepped approach (Croudace Homes PSQ25-6052, Chelmsford Garden Community Consortium PSQ25-6350, Richborough PS25-179, Wates Developments and Hammonds Estates LLP PS25-333)
- BREEAM should only be applied to development over 1,000sqm (Vistry Group PSQ25-6372)
- For the Council to require standards above those set out in Building Regulations they must be expressed as a percentage of the target emission rate and not as an energy use target (Home Builders Federation PSQ25-5481)
- The Council's Viability Update Note 2024 suggests the costs of achieving the policy to be 8% above current regulations, this seems low, and is lower than the cost of delivering net zero homes in the Council's earlier evidence which cited it would be 12.5% of the cost of construction (Home Builders Federation PSQ25-5481)
- Requirement 4 provides no flexibility in the delivery of renewable energy and essentially mandates roof top solar PV energy regardless of whether this remains the most effective form of renewable energy generation over the plan period. Alternative forms of sustainable energy generation that could result in equivalent benefit or carbon saving should be considered (Barratt Redrow PSQ25-5172, Anglia Ruskin University PSQ25-6216)
- Designs to suit solar orientation could lead to conflict between design and energy policies (Barratt Redrow PSQ25-5172)
- Requirement 5 is not clear whether this information would need to be signed off under a formal discharge of condition and it is unclear what is meant by "as built performance information". There is also a practical conflict in how this proposed policy would operate. To comply with this policy, as drafted, a home would need to remain empty after the issue of a Final Certificate until the required as built performance information has been submitted and approved by the Local Planning Authority (Barratt Redrow PSQ25-5172)
- Design policies and design codes will need to ensure that development is not refused for seeking to meet energy efficiency standards but, for example, not potentially being designed in the character of the local area (Home Builders Federation PSQ25-5481)
- Policy should require a development to be net zero rather than for individual homes as some, such as terrace houses and flats, are more intrinsically

energy efficient and emit less carbon compared to detached homes and bungalows (Home Builders Federation PSQ25-5481)
- The size threshold for requirements 1-5 to apply is too low. Reference to 100sqm should be replaced with 1,000sqm. This larger size threshold not only facilitates greater flexibility to enable modest developments to progress without the time and cost restrictions associated with the targets but also reflects the definition of 'major development' in planning terms (Anglia Ruskin University PSQ25-6216)
- The need for a financial contribution in lieu of sufficient on-site renewable sources to offset annual demand of the building(s) in question is not considered to meet the tests of soundness. Whilst it is accepted that certain profitable projects may well be able to fund the off-site PV contribution, it is suggested that certain developments and/or uses should be excluded from the need to pay off site contributions (Anglia Ruskin University PSQ25-6216)
- Modifications to requirements 1 and 3 are required to align with the UK Net Zero Carbon Building Standard Pilot (NZCBS) 2024 as this is the industry's current leading Net Zero Carbon definition (Wates Developments and Hammonds Estates LLP PS25-333).

Policy DM26 – Design Specification for Dwellings

Summary of Representations – main issues and requested changes:

- Suggest that the inclusion of 'safe, secure and sustainability' concepts are embedded within the Design and Place Shaping Principles (Essex Police PSQ25-2677).

Policy DM27 – Parking Standards

Summary of Representations – main issues and requested changes:

- Any new proposed public car parks should seek to achieve Park Mark accreditation (Essex Police PSQ25-2678)
- Support for the policy, including reference to bespoke parking standards for Chelmsford Garden Community (Chelmsford Garden Community Consortium PSQ25-6344, Vistry PSQ25-6367).

Policy DM28 – Tall Buildings

Summary of Representations – main issues and requested changes:

- Support for the policy, and references to heritage assets (Historic England PSQ25-5819)
- Recommends the use of Secured by Design (SBD) Police Preferred Security Products (Essex Police PSQ25-2680)
- Design should ensure sufficient corridor space for safe evacuation and access by emergency services; would welcome financial contributions as required by fire and rescue facilities for equipment to support rescue (East of England Ambulance Service NHS Trust PSQ-5246)

- Suggest the policy should also apply to other locations that are well served by public transport (Vistry Group PSQ25-6387).

Policy DM29 – Protecting Living and Working Environments

Consultation point	Total number of responses
Policy DM29 – Protecting Living and Working Environments	0
Policy DM30 – Contamination and Pollution	1

No comments.

Policy DM30 – Contamination and Pollution

Summary of Representations – main issues and requested changes:

- Pleased with the water quality wording in all policies and satisfied that wastewater treatment capacity and local water environment will be protected by the plan policies (Environment Agency PSQ25-6269)
- Welcome the policy. Appreciate reference to the relevant Land Contamination Remediation Methods guidance in para 9.97 but move to para 9.95 or a separate paragraph as the process is relevant to any sites managing the risks from land contamination, which may include non-hazardous pollutants and not only those where hazardous substances are present (Environment Agency PSQ25-6269).

Monitoring Framework

Consultation point	Total number of responses
Table 8	0

No main issues

Draft Policies Map

This section of the consultation document sets out the Draft Policies Map which illustrate sites for development or protection within the Local Plan.

Consultation point	Total number of responses
Draft Policies Map (Paragraphs 11.1-11.3)	0
Map 1 – Chelmsford North	1
Map 3 – Chelmsford Urban Area	5

Map 4 – Chelmsford City Centre	1
Map 8 - Bicknacre	2
Map 9 – Boreham	1
Map 11 – Chatham Green	0
Map 13 – East Hanningfield	1
Map 16 - Galleywood	1
Map 18 – Great Leighs	1
Map 23 – Little Waltham	1
Map 37 – Writtle	1
Rural Employment Areas	0
Other Maps	0
Legend	0

Chelmsford Urban Area (Map 3) Summary of Representations – main issues and suggested changes:

- Support in general but identify the Marriage Mill Cranham Road as a new employment area which has permission for 3,400sqm of B2/B8 floorspace (W & H Marriage & Sons Limited PSQ25-6057)
- Either delete ‘Area for Conservation/Strategic Enhancement’ notification for Site 16a, say it is illustrative or amend to ‘Land Allocated for Future Recreation Use and/or SuDS and/or Biodiversity and/or Solar/Appropriate Renewable Energy Generation’ (Wates Developments and Hammonds Estates LLP PS25-301)
- Extend the New Garden Community for Major Housing and Employment Development annotation at Site 16a to include Land Adjacent to Sandford Mill Lane and Land at Rumbolds Farm (as shown on submitted Appendices 1A and 1B of our Written Representations) so that the map is justified by appropriate evidence; and to contribute to housing, employment and energy delivery to support other policies in the plan (Wates Developments and Hammonds Estates LLP PS25-301)
- The settlement boundary should be reviewed to include the promoted site south of Church Road in Great Baddow given the introduction of Grey Belt in the NPPF 2024. The site does not contribute strongly to Green Belt purposes and is sustainably located (Newell Properties Development Ltd PSQ25-5050)
- A small-scale alteration to the Green Wedge/Green Belt boundary should be considered and an extension to the Employment Area allowed at Robjohns Road, Rodney Way in line with national policy. This would enhance the local rural economy and provide additional local infrastructure (Saxtons 4x4 PSQ25-6112)
- The employment areas designation on the corner of Brook Street and New Street (the former Kay-Metzeler premises) should be amended to identify an employment area designation for the eastern part of the site and a mixed use residential and commercial allocation for the western part of the site (HEVF Self Storage UK Limited PSQ25-6337)
- The Urban Area Boundary and Green Belt boundary should be amended to incorporate land south of Galleywood Road which has no other constraints other than the Green Belt designation (Taylor Wimpey Strategic Land PSQ25-5448)

- Allocate land at Bulls Lodge Farm for residential development or include it in Chelmsford Urban Area, given its proximity to Beaulieu Park station (Sean Culleton PSQ25-1587)
- Amend the boundary of SGS3c to include the SuDS area to the east (Barratt Redrow PSQ25-5167).

Boreham (Map 9) Summary of Representations – main issues and suggested changes:

- Land to the north of Orchard Way should be included in the settlement boundary together with the Council acquired site to the north to reflect the development potential of the sites. This can facilitate development with minimal impact (Urban Provincial PSQ25-4979).

Chatham Green (Map 11) Summary of Representations – main issues and suggested changes:

- Change the settlement boundary for Chatham Green to include all the built form of the village i.e. Baileys Cottage, the Windmill Pub, the two dwellings next to the village green and the industrial site, Pondside Nursery and Yard (Mr and Mrs Andrew Parker PS25-99).

East Hanningfield (Map 13) Summary of Representations – main issues and suggested changes:

- Support expressed including the identification of Growth Site 17a (Chelmsford Diocese Board of Finance PSQ25-718).

Galleywood (Map 16) Summary of Representations – main issues and suggested changes:

- Undertake a Green Belt Review and reflect its conclusions on the Policies Map. This would require changes to Map 16 to include a promoted site at Beehive Lane (BDW Eastern Counties PSQ25-6031).

Great Leighs (Map 18) Summary of Representations – main issues and suggested changes:

- The current approach to the DSB is overly reliant on arbitrary boundaries which does not feature in the NPPF. Rather than stifling growth in a Key Service Settlement, a flexible, sustainable outlook could be adopted. This would enable contribution on merit for deliverable well connected sustainable sites including in Great Leighs (Helen Sadler PS25-31)
- It is essential that the boundaries are logical, easily identifiable and follow property boundaries, permanent features and encompass suitable undeveloped sites and that historical use is acknowledged (Mrs Helen Sadler PS25-60 & 63).

Little Waltham (Map 23) Summary of Representations – main issues and suggested changes:

- Remove the Green Wedge from the promoted site adjacent to 148 The Street. This is a sustainable location in a Service Settlement outside the Green Belt, lacking any development constraints (Paul Hopkins PSQ25-6391).

Writtle (Map 37) Summary of Representations – main issues and suggested changes:

- Support the SPA for ARU Writtle (Anglia Ruskin University PSQ25-6217)
- Remove the 'Open Space' designation on ARU Writtle at Sturgeons Farm as there are no specific land uses that warrant this (Anglia Ruskin University PSQ25-6217).

Appendices

This section of the consultation document contains four appendices.

Consultation point	Total number of responses
Appendix A – Schedule of Superseded Documents and Policies	0
Appendix B – Development Standards	2
Appendix C – Development Trajectories	7
Appendix D – Glossary	1

Summary of Representations – main issues and requested changes:

Appendix B

- Table 16 - the total provision of open space for developments of 30 dwellings or more is 94sqm per dwelling. This compares with 59sqm in the adopted plan with the introduction of ‘natural and semi-natural greenspace’. Further justification for this increase is required, and its impact on the deliverability of strategic sites considered (Chelmsford Garden Community Consortium PSQ25-63653, Vistry Group PSQ25-6381).

Appendix C

- Object to the trajectory as there are aspects of the proposed housing supply which are unjustified or inconsistent with National Policy. The plan should be meeting local housing needs in full and have a higher supply buffer. Need to undertake a Green Belt Review and identify additional sites to meet the proposed housing requirement under Policy S6 (Barratt David Wilson – Eastern Counties (BDW) PSQ25-6027)
- The delivery of Growth Site 17a is expected to be achieved during 2028/29 (Year 5 of the Housing Site trajectory) or more conservatively during 2029/30

(Year 6) rather than during 2030-2034 (Chelmsford Diocese Board of Finance PSQ25-717)

- Support the Development Trajectory including the growth assumptions for SGS16a which addresses NPPF para 69 (Wates Developments and Hammonds Estates LLP PS25-317, PS25-343)
- The Council has maintained strong results against the housing delivery test and a five-year housing land supply (Wates Developments and Hammonds Estates LLP PS25-317, PS25-343)
- Delivery of SGS16a from year 6 of the plan onwards and 3,000 dwellings by 2041 is supported by the evidence in the submitted Infrastructure Delivery Plan and could begin delivering residential within the first five years of the plan by incorporating an additional development parcel at Sandford Mill Lane. The site masterplan is programmed immediately after reviewed Local Plan adoption in 2026 but could be earlier. The Master Developer model will support multiple concurrent delivery outlets and different housing tenures will allow a wider range of partners to fund and deliver development which could enable the average timeframe within the Lichfields Start to Finish Report (Third Edition dated March 2024) to be improved (Wates Developments and Hammonds Estates LLP PS25-343)
- The plan is not unduly reliant on large scale garden community developments (SGS6 and 16a will deliver less than half of Chelmsford's total housing supply) and is supported by a wide range of sites at other scales (Wates Developments and Hammonds Estates LLP, PS25-313, PS25-343)
- Unclear how the trajectories identified have been defined, whether these are realistic and if the 5-year supply of sites are deliverable. There is a risk of over-reliance on sites which are not deliverable during the next 5-years. There are various instances where allocations forecast to deliver in the first 5 years carried-forward from the adopted plan have not done so including North East Chelmsford and South Woodham Ferrers. More smaller to medium sites will be needed in the short-term (Martin Grant Homes PSQ25-2613)
- Various allocations in the trajectory of the adopted Local Plan have already slipped against the expectations of that plan and not started to deliver housing, including North East Chelmsford and Great Leighs. The Housing Trajectory (April 2024) confirms that an average of only 883 dwellings per year were completed during the period 2013/14 to 2023/24, approximately 8% below expectations. Allocate an additional site (Dandara Eastern PSQ25-6210)
- Para C.2 - The Five-Year Housing Land Supply position will deteriorate during the late-2020's and into the early-2030's. This is due to the over-reliance upon the optimistic delivery rate of new homes at the Hammonds Farm given the site preparation works and new or substantial infrastructure provision that will be necessary before any built development can commence. An immediate Green Belt Review is required to identify additional sites (W. D. Smith & Son PSQ25-6021, PSQ25-6022)
- Question the allocation of Hammonds Farm – it will only deliver housing during the middle of the plan period potentially creating a gap in housing delivery to 2041 and has unrealistic delivery rates as supported by 'Start to Finish' research from Lichfields (Dandara Eastern PSQ25-6210).

Appendix 1: Organisations consulted and copies of key consultation materials

APPENDIX 1

Organisations consulted and copies of key consultation materials

List of organisations consulted	2
Statement of Representation	4
Notification letter – Example	16
Notification e-mail – Example	20
Website – Local Plan Page	24
Website – Consultation Page	51
Consultation Portal – Screen Shots	54
Consultation Portal Guidance Notes	55
Paper Response Form	61
Pop-Up Stands	68
Exhibition Panels	69
Local Plan Video	81
Essex Chronicle Advert	82
Covering Letter and Local Plan Poster	83
Site Notices – Examples	85
Staff Email Banner and Website Banner	86
Local Plan Newsletter	86
Parish and Town Council Information Pack	91
Frequently Asked Questions	108
Communications & Marketing Campaign Report:	117

City Times and South Woodham Focus Articles
- City Life Articles
- Examples of Social Media Posts
- GovDelivery Mailshots
- Bus Stop Adverts

List of organisations consulted

The Council notified more than XXXX contacts registered on its Consultation Portal.

This included the specific and general contacts listed below, and members of the public who are not listed.

1st Chelmsford Scouts
A Dunn & Son
Abbess, Beauchamp & Berners Roding Parish Council
Abellio Greater Anglia
Accord Energy Limited
Active Travel England
Active Workspace Ltd
Agency of Architecture
Aggregate Industries UK Ltd
Aldi Stores
Alistair Stewart
Anchor Housing
Andrew Wing
Angel Stores
Anglia Ruskin University
Anglian Water Services Ltd
Arriva The Shires and Essex
Atkins Telecom
Aviva
Baddow Hall Junior School
BAE Systems
Bakers Lane Action Group
Bang and Olufsen
Barking & Dagenham CCG
Barnes Farm Infant & Junior School
Barnston Parish Council
Barton Willmore
Basildon & Brentwood CCG
Basildon Borough Council
BBC Essex
BDP
Beaulieu Residents
Becket Keys C of E Secondary School
Bennetts BMW Specialists
Billericay Town Council
Bishops Primary School
Black Notley Parish Council
Blackmore, Hook End & Wyatts Green Parish Council
Boreham Bowling Club
Boreham Conservation Society
Boreham Parish Council
Boreham Primary School
Boxford (Suffolk) Holdings Ltd
Bradwell Power Generation Company Limited
Braintree District Council
Brentwood and Chelmsford Green Party
Brentwood Borough Council
Bressole Limited
Broomfield Neighbourhood Plan Steering Group
Broomfield Parish Council
Broomfield Parish Council, Chignal Parish Council, Great Waltham Parish Council, Little Waltham Parish Council, Writtle Parish Council and Newlands Spring Residents Association
Broomfield Primary School
Broxbourne Council
BT National Notice Handling Centre
BT Openreach, Southend ATE
Building Research Establishment
CAAG
Cadent Gas
Campaign for Real Ale Limited
Campaign to Protect Rural Essex
CAODS (Chelmsford Amateur Operatic & Dramatic Society)
Capital & Counties (Financial Services) Ltd
Carter Jonas
Castle Point & Rochford CCG
Castle Point Council Centrica
Barry/ Generation/ KL/ PB/ RPS
CERA (Chignal Estate Residents Association
Chancellor Park Primary School
Channels Residents Community Group
Chelmer & Blackwater Navigation Co Ltd
Chelmer Canal Trust
Chelmer Cycles
Chelmer Cycling Club
Chelmer Housing Partnership
Chelmer Residents Forum
Chelmer Valley High School
Chelmer Valley Landscape Group
Chelmer Village Parish Council
Chelmsford and District Model Railway Club
Chelmsford Biodiversity Forum
Chelmsford Business Board
Chelmsford Canoe Club
Chelmsford Cathedral
Chelmsford City Centre Retailers Group
Chelmsford City Council
Chelmsford City Football Club
Chelmsford Civic Society
Chelmsford College
Chelmsford Community Church
Chelmsford Community Transport Limited
Chelmsford Commuters & Rail Travellers
Chelmsford County High Schools for Girls
Chelmsford CVS
Chelmsford Cycle Action Group
Chelmsford Diocese Board of Finance
Chelmsford Garden Community Council
Chelmsford Gospel Hall Trust
Chelmsford Gym Club
Chelmsford Hindu Society
Chelmsford Labour Party
Chelmsford Liberal Democrats
Chelmsford Liberal Party
Chelmsford Mencap
Chelmsford Rivers and Canal Link group (CRACL)

Chelmsford Rugby Football Club
Chelmsford Social Club
Chelmsford Star Co-operative Society Ltd
Chelmsford Taxi Association Limited
Chelmsford Theatre Workshop
CHESS
Chignal Estate Residents Association
Chignal Parish Council
Chris Marten Architectural Services
Christian Care
Christian Growth Centre Chelmsford
Church of Our Lady Immaculate
Clark Partnership
Clearview Relocation
Coal Pension Properties Ltd
Colchester City Council
Cold Norton Parish Council
Colliers
Collingwood Primary
Colt Technology Services
Columbus School & College
Company of Proprietors of the Chelmer & Blackwater Navigation Ltd
Confederation of Passenger Transport UK
Connexions & Careers Chelmsford
Cool Heat Services
Corona Energy Retail 4 Ltd
Countryside Properties
CPRE Essex
Craintern Ltd
Crest Nicholson
Crouch Vale Brewery Ltd
Croudace Homes
Crown Energy Ltd
Culture Chelmsford
Cycling UK
D.W.S Bodyworks Ltd
Danbury Mission
Danbury Neighbourhood Plan Steering Group
Danbury Parish Council
Danbury Park Community Primary School
Danbury Society
Data Energy Management Services Ltd
Defence Infrastructure Organisation (DIO)
Department for Business and Trade
Department for Education
Department for Energy Security and Net Zero
Department for Science, Innovation and Technology
Department for Transport (DfT)
Design Council
detoxpeople ltd
DevPlan UK
Diageo Pension Trust Ltd
Diocese of Chelmsford
Dominvs Group
Downes Planning Partnership
Downham CE (VC) Primary School
Downham Village Hall Committee
DTI
DWS Bodyworks
E.ON UK Plc
E2V Technologies
East Anglia GREEN
East Hanningfield Parish Council
East Hanningfield School
East Herts District Council
East of England Ambulance Service NHS Trust
East Thames Housing
Eastlight Homes
Ecotricity
EDF Energy
Education & Skills Funding Agency
EE
Elim Christian Centre
Elm Green Preparatory School
Elmwood Primary School
Energy Environment and Sustainability Group
English Rural Housing Association
ENI UK Ltd
Environment Agency
Environmental Dimension Partnership (EDP)
Epping Forest District Council
esperance energies
Essex & Suffolk Water
Essex ARG
Essex Association of Local Councils
Essex Audi Automotive Group
Essex Bridleways Association
Essex Chamber of Commerce
Essex Chronicle
Essex County Council
Essex County Fire and Rescue Service
Essex Herts Air Ambulance Trust
Essex Islamic Trust
Essex Local Access Forum
Essex Local Nature Partnership
Essex Muslim Centre
Essex Police
Essex Police Fire and Crime Commissioner
Essex Record Office
Essex Respite and Care Association
Essex Squash & Racketball Association
Essex Waterways Ltd
Essex Wildlife Trust
Estuary Housing Association
Exolum Pipeline System Ltd
Eyott Sailing Club
Falcon Bowling and Social Club
Farleigh Hospice
Felsted Parish Council
First Buses
Flagship Housing Group Ltd
Flaternity Residents association
Flitch Green Parish Council
Football Association
Ford End Church of England Primary School
Ford End Village Design Statement Committee
Forestry Commission England
Friends, Families and Travellers and Traveller Law Reform Project
Galleywood Equestrian Centre
Galleywood Infant School
Galleywood Parish Council
GB Partnerships
Great Baddow High School
Gladman Developments Ltd
Going Places Leisure Travel Ltd

Good Easter Parish Council
Good Easter Village Hall
Great & Little Leighs Parish Council
Great Baddow County Primary School
Great Baddow High School
Great Baddow Lawn Tennis Club
Great Baddow Parish Council
Great Baddow St Mary
Great Notley Parish Council
Great Waltham C of E (VC) Primary School
Great Waltham Parish Council
Greater London Authority
Green Planning Studio Ltd
Greenfields Community Housing Ltd
Greenwood Estates Ltd
Greenwoods Hotel and Spa Group
H M Prison Service
H R Philpot & Son (Gt Hayes) Ltd
Halliday West Surveyors
Hamilton Bentley & Partners
Hanson Aggregates Ltd & Threadneedle Pensions Ltd
Harlow District Council
Hastoe Housing Association
Hatfield Peverel Parish Council
Havering CCG
Havering London Borough
Heads 2 Minds
Health and Safety Executive
Heart of Essex Local Enterprise Partnership
Heathcote School
Hedingham and Chambers
Help The Aged
Heritage Writtle
Hertfordshire and West Essex ICB
Hertfordshire County Council
HEVF Self Storage UK Limited
High Chelmer
High Easter Parish Council
High Ongar Parish Council
Highways England
Highwood County Primary School
Highwood Parish Council
Hill
Historic England
Home Builders Federation
Homes England
House Of Commons
Housebuilders Consortium
Howe Green Community Association
Hullbridge Parish Council
Hylands School
Ideas Hub
Independence Project
Ingatestone & Fryerning Parish Council
Ingatestone Village Design Statement
Ingleton Wood (Billericay)
Intergen
J & A Lyon
J Matthews Trust
J. Aron & Company
Jacobs UK Limited
JCN Associates Ltd
JLL
JWF Hughes Mid-Essex Gravel + MJ Peters
Keeble Brothers
King Edward Grammar School
Kings Hardware Ltd
Kings Road Primary School
Kings Road/North Avenue Community Action Group
KLW Planning
KM Consulting
Knight Developments Ltd
L Q Group
L&Q
Landgage Heritage
Landscape Planning Group Ltd
Langford and Ulting Parish Council
Larkrise Primary School
Larmar Engineering
Latimer Homes
Lawford Mead Primary & Nursery School
LawnsActionGroup
Lewis & Scott Retirement Living
Life Education Trust
Little Baddow History Centre
Little Baddow Parish Council
Little Baddow Society
Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group
Little Dunmow Parish Council
Little Waltham C E V A Primary School
Little Waltham Parish Council
Lodge Coaches
London Borough of Barking and Dagenham
London Borough of Enfield
London Borough of Redbridge
London Borough of Waltham Forest
London Gypsies and Travellers Unit
Longfield Solar Farm
Lower Thames Crossing
M Scott Properties Ltd
Maldon District Council
Maltese Road Primary School
Mansfield Monk Limited
Marconi Plaza Residents Association
Margaret Roding Parish Council
Margaretting CE (VC) Primary School
Margaretting Parish Council
Marine Management Organisation (MMO) HM Government
Mashbury Parish Council
Master Designs Essex
McDonald's Restaurants
Meadgate Primary School
Meadows Shopping Centre
Medical Services Danbury Ltd
MHCLG
Mid and South Essex Integrated Care Board (ICB)
Mid Essex Gravel Pits (Chelmsford) Ltd
Mid Essex Hospital Services NHS Trust
Mid Essex Primary Care Trust
Mid-Essex Business Group
Mildmay Infant and Nursery School
Miscoe Enterprises Ltd
Moat Homes
Mobile Broadband Network Limited
Mobile Uk
Montagu Evans

Moulsham High School
Moulsham Infant School
Moulsham Junior School
Moulsham Mill Partnership
Mountnessing Village Council
N Clark Welding & Fabrication
Nabbotts County Infants School
National Federation of Gypsy Liaison Groups
National Gas Transmission System
National Grid
National Grid Electricity Transmission
National Highways
National Trust
Natural England
Neos Networks
Network Rail
New Hall Properties (Eastern) Ltd
New Hall School
Newlands Spring Primary School Academy Trust
Newlands Spring Residents Association
NGB Essex Angling
NGB Essex Athletics
NGB Essex Basketball
NGB Essex Boccia
NGB Essex Bowls
NGB Essex Cricket
NGB Essex Cycling
NGB Essex Fencing
NGB Essex Football
NGB Essex Gymnastics
NGB Essex Hockey
NGB Essex Lacrosse
NGB Essex Movement and Dance
NGB Essex Orienteering
NGB Essex Rowing
NGB Essex Rugby Union
NGB Essex Sailing
NGB Essex Squash
NGB Essex Triathlon
NGB Essex Volleyball
NHS England East
NHS Improvement Team
NHS North East London
NHS Property Services Ltd
NHS South East and South West Essex
NHS Suffolk and North East Essex ICB
NIBS Buses
NJB Hotels and Leisure Property
North Central London CCG
North Chelmsford Villages Community Group
North Essex Partnership NHS Foundation Trust
North Fambridge Parish Council
North West Parishes Group
Northern Trust
Oaklands Infants School
Office of Rail Regulation
Our Lady Immaculate R C Primary School
Paper Mill Lock Cruises Ltd
Parkway and Town Centre Neighbourhood Action Panel
Parkwood Academy
Perryfields County Infants School
Perryfields Junior School
PKC Retail Ltd
Planware Ltd
Pleshey Parish Council
Premier Homes
Princes Rd Allotment Association
Priory Primary School
PRS
Ptarmigan Land
Purleigh Parish Council
R Kemball
Ramblers Essex Area
Ramsden Bellhouse Parish Council
Ramsden Crays Parish Council
Rawreth Parish Council
Rayleigh Town Council
Rayne Parish Council
RCCE
Redbridge CCG
Redrow Homes
Rentplus
Reprohouse Limited
Resting Places Limited
Retail Focus
Rettendon Common Residents Association
Rettendon Parish Council
Rettendon Primary School
Richborough Estates
River Crouch Conservation Trust
Road Haulage Association
Robert Brett & Sons Ltd
Robert Dewer Associates
Rochford District Council
Rolfe-Judd
Roxwell CoE (VC) Primary School
Roxwell Parish Council
Royal Mail Group
Royal Society For Protection of Birds
RSPCA
Rugby Football Union
Runwell Parish Council
Rural Community Council of Essex
Ruston Planning Limited
S B Papineni
Sainsbury's Supermarkets Ltd
Sandon Parish Council
Sandon School
Save Sandford Mill Campaign
Scott Brownrigg
Scottish & Southern Energy Pipelines
Shirley Smith & Co
Shotgate Parish Council
Showmens Guild GB
Sky Telecommunication Services Ltd
Smithbrights Butchers
Smiths Environmental Products Ltd
South East LEP
South Hanningfield Parish Council
South Woodham Action Group
South Woodham Ferrers Health & Social Care Group
South Woodham Ferrers Residents Party
South Woodham Ferrers Town Council
Southend Borough Council
Southern Electric
SP Power Systems
Sport England
Springboard Housing Association ltd

Springfield Parish Council
Springfield Park Baptist Church
Springfield Primary School
SSA Planning
SSE Pipelines Ltd
St Anne's Preparatory School
St Augustine's Catholic Church
St Cedd's School
St John Payne Catholic School
St John's C of E Primary School
St Joseph's Catholic Primary School
St Mary's CE Primary School
St Mary's Church Great Baddow
St Peters Primary School
St Pius X Catholic Primary School
St. Michael's Junior School
Standard Life Investments
Stanfords
Stephenson's of Essex Ltd
Stevens VW Dismantlers
Stock CE Primary School
Stock Parish Council
Stow Maries Parish Council
Suffolk County Council
Swan Housing Association
Swifts Local Network: Swifts & Planning Group
Talyor Wimpey East London
Tan Stand Tanning Centre
Telecom Plus PLC
Tendring District Council
Terling and Fairstead Parish Council
Tetlow King Planning
The Beaulieu Park School
The Boswells School
The Cathedral School
The Chelmsford Ballet Company
The Chelmsford Labour Party
The Chelmsford Society
The Essex Badger Protection Group
The Inland Waterways Association (Chelmsford Branch)
The John Bishop Partnership
The JTS Partnership
The Land Trust
The Landscape Conservation Trust
The National Federation of Gypsy Liaison Groups
The Newspaper Society
The Planning Bureau
The Royal Horticultural Society
The Sandon School
The Showmen's Guild of Great Britain
The Tyrells Primary School
The Wilderness Foundation UK
The Woodland Trust
The Writtle Surgery
Theatres Trust
Threadneedle Pensions Ltd
Three
Thrift Farm Ltd
Thriftwood School
Thurrock Borough Council
Timpsons
TMA Chartered Surveyors
Total Energies Gas and Power Services UK Ltd
Toveglen Ltd
Transition Chelmsford
Transport East
Transport for London
Traveller Law Reform Project
Travelling Showmans Guild
Trinity Road Primary School
Trinity St Mary's CE (VA) Primary School
Trustees of the Fulbournes Settlement
Tyrells School
UK Power Networks
Uttlesford District Council
Valco UK Ltd
Virgin Media Services
Vitol Gas Ltd
Vodafone and O2
W & H Marriage & Sons Ltd
Waitrose Ltd
Wardrop & Co Ltd
Waterhouse Farm Residents Association
WEA Sec
Welsted Joinery Ltd
West Hanningfield Parish Council
West Register (Realisations) Ltd
Westlands CP School
WH Marriage & Sons Ltd
Wickford Town Council
Widford Lodge Preparatory School
William de Ferrers School
Willingale Parish Council
Wilson Construction Ltd
WM Morrison Supermarket Plc
Women’s Institute
Woodham Ferrers & Bicknacre Parish Council
Woodham Infrastructure Group
Woodham Mortimer with Hazeleigh Parish Council
Woodham Walter Parish Council
Woodland Trust
Woodville Primary School
Writtle Infant School
Writtle Junior School
Writtle Neighbourhood Plan Group
Writtle Parish Council
Writtle Surgery
Writtle University College
Writtle VDS
YMCA

REVIEW OF THE LOCAL PLAN
PRE-SUBMISSION (REGULATION 19) STATEMENT OF REPRESENTATION PROCEDURE AND STATEMENT ON AVAILABILITY OF PROPOSED SUBMISSION DOCUMENTS FOR INSPECTION

Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) - Regulations 7, 19, 20 and 35

Chelmsford City Council is inviting your comments on the following documents:

- Chelmsford Local Plan – Pre-Submission (Regulation 19) Document
- Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment
- Co-Living Housing Planning Advice Note
- Consultation Draft Planning Obligations Supplementary Planning Document.

The City Council is publishing the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document for consultation from 4 February to 18 March 2025. It is accompanied by the Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment. This is in accordance with Regulations 19 and 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The Local Plan shapes future growth and development across the whole of Chelmsford City Council's area. It sets out a positive vision, identifies where and how new development should take place in the future as well as areas for protection. It includes strategic policies, site allocation policies, development management policies and a Policies Map for determining all forms of planning applications. We adopted our current Local Plan in May 2020. We need to review the plan at least every five years to make sure it remains up to date and meets the changing needs for development growth to 2041.

The Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment comprises a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), Habitats Regulations Assessment (HRA), Health Impact Assessment (HIA) and Equality Impact Assessment (EqIA).

In addition, the Council is also consulting on a Co-Living Housing Planning Advice Note. The Planning Advice Note seeks to provide practical guidance to potential promoters or developers of co-living housing in Chelmsford, to ensure they meet the Council's expectation in this regard.

The Consultation Draft Planning Obligations Supplementary Planning Document (SPD) is also being consulted on. This sets out how the Council will seek planning obligations when considering planning applications. The adopted SPD was published in January 2021 and has been updated to reflect proposed changes in the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document, as well as changes in national planning policy. It refers to the latest published Infrastructure Delivery Plan and integrates and updates some published Planning Advice Notes.

This note has nine parts:

- PART 1 – What is a Regulation 19 Consultation
- PART 2 – Legal Compliance and Duty to Co-operate
- PART 3 – Soundness
- PART 4 – Where can I view the consultation documents?
- PART 5 – How can I comment?
- PART 6 – Appearing at Independent Examination
- PART 7 – What will happen with my representation?
- PART 8 – Statement on availability of proposed submission documents for inspection
- PART 9 – Other consultations

The consultation period runs from 10am on 4 February 2025 until 4pm on 18 March 2025 Comments received before or after this time cannot be accepted.

PART 1 – What is a Regulation 19 Consultation

As a Local Planning Authority, the Council must publish the version of the Local Plan that it intends to submit to the Planning Inspectorate for Independent Examination. This allows for representations to be made which can be considered at Independent Examination. This is known as the publication stage, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended www.legislation.gov.uk/uksi/2012/767/contents. For Chelmsford, this is the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document (the 'Plan').

The Planning Inspector undertaking the Independent Examination will assess whether the Local Plan has been prepared in line with the relevant legal requirements (including the duty to co-operate) and whether it is 'sound'.

PART 2 – Legal Compliance and Duty to Co-operate

You should consider the following before making a representation on legal compliance:

- The Plan should be included in the Council's current Local Development Scheme (LDS) and the key stages set out in the LDS should have been followed. The LDS is effectively a programme of work prepared by the Council, setting out the plans it proposes to produce. It will set out the key stages in the production of any Plans which the LPA proposes to bring forward for Independent Examination. If the Plan is not in the current LDS it should not have been published for representations. The Council's LDS is available to view on its website at:www.chelmsford.gov.uk/media/ew4mbrsr/chelmsford-local-development-scheme-2023-2028.pdf
- The process of community involvement for the Plan in question should be in general accordance with the Council's Statement of Community Involvement (SCI). The SCI sets out the Council's strategy for involving the community in the preparation and revision of plans and the consideration of planning applications. The Council's SCI is available to view on its website at: www.chelmsford.gov.uk/sci
- The Council is required to provide a Sustainability Appraisal (SA) report when it publishes a Plan. This should identify the process by which the SA has been carried out, and the baseline information used to inform the process and the outcomes of that process. The SA

is a tool for assessing the extent to which the Plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The SA for this Plan is included within the published Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment.

- The Plan should comply with all other relevant requirements of the Planning and Compulsory Purchase Act (PCPA) and the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.

You should consider the following before making a representation on compliance with the duty to co-operate:

- Section 33A of the PCPA requires the Council to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the Plan. The Council's Duty to Co-operate Position Statement (December 2024) provides an update on the activities undertaken by Chelmsford City Council (CCC) in respect to the Duty to Co-operate on the Review of the adopted Chelmsford Local Plan, and is available to view on the Council's website at: https://www.chelmsford.gov.uk/media/g2pn5tmg/dtc002-duty-to-cooperate-position-statement-december-2024.pdf
- Non-compliance with the duty to co-operate cannot be rectified after the submission of the plan. Therefore, the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector cannot recommend adoption of the Plan.

PART 3 – Soundness

A Local Planning Authority should submit a Plan for Independent Examination which it considers to be "sound". The tests of soundness are set out in the National Planning Policy Framework (NPPF). Plans are sound if they are:

Positively prepared – providing a strategy which, as a minimum seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

Effective – deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF. Please note that in accordance with paragraph 234 of the 2024 NPPF, for the purpose of preparing local plans this Plan will be examined under the 2023 NPPF.

Representations made by you at this stage should focus on whether the plan meets the tests listed above. This is because these are the broad areas that the Inspector will focus on in examining the Local Plan.

If you think the content of the Local Plan is not sound because it does not include a policy on a particular issue, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy?
- Is the issue with which you are concerned already covered by another policy in the Local Plan?
- If the policy is not covered elsewhere, in what way is the Local Plan unsound without the policy?
- If the Local Plan is unsound without the policy, what should the policy say?

PART 4 - Where can I view the consultation documents?

You can read the consultation documents in the following ways:

- On the Council's Consultation Portal at www.chelmsford.gov.uk/planningpolicyconsult. This system also allows you to submit comments to the consultations
- On the Council's website alongside the Local Plan evidence base documents at www.chelmsford.gov.uk/lp-review
- At the Chelmsford City Council Customer Service Centre, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford CM1 1JE (10am to 4pm Monday to Friday).

At the following drop-in public exhibitions. These will provide an opportunity to meet an officer face-to-face unless otherwise stated.

Location	Date	Time
Council Chamber, Civic Centre, Duke Street, Chelmsford, CM1 1JE	Thursday 27 February Friday 28 February Saturday 1 March	6pm - 8pm 2pm - 4pm 10am - 12noon
High Chelmer Shopping Centre, Exchange Way, Chelmsford, CM1 1XB	Monday 24 February to Sunday 2 March	Unstaffed exhibition panels displayed all-day during shopping centre opening hours
South Woodham Town Council, Champions Manor Hall, Hullbridge Road, South Woodham Ferrers, CM3 5LJ	Thursday 13 February to Tuesday 25 February	Unstaffed exhibition panels displayed 9am - 4pm (except weekends)

Please check our website www.chelmsford.gov.uk/lp-review for any updates before making your journey.

If you are unable to access the documents on a computer, you can request paper copies by emailing planning.policy@chelmsford.gov.uk, telephoning (01245) 606330 or by writing to Spatial Planning Services, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE. A charge will be made to cover printing and postage costs.

PART 5 - How can I comment?

You can comment on the consultation documents in the following ways:

Online Consultation Portal:
Go to: www.chelmsford.gov.uk/planningpolicyconsult where you can:

- Read the consultation documents
- Make your comments via the specially designed representation form
- Sign up for alerts to feedback reports and future consultations

This is our preferred means of receiving comments as it ensures that your comments are recorded accurately and are processed quickly.

It also allows you to edit comments before submitting them, save a draft and return to your form later, and to upload any supporting material. Please **save** your comments as you complete the form using the 'Save as Draft' button at the bottom of the form as the system will timeout after 30 minutes.

You can view, download, and comment on all the consultations via the online Consultation Portal: www.chelmsford.gov.uk/planningpolicyconsult

If you have not already registered, registration is simple using the easy to follow steps in our User Guide: www.chelmsford.gov.uk/lp-portal-guide. These guidance notes include more information on the Consultation Portal, including what to do if you have forgotten your password, and how to make your comments. If you have followed the user guide and have any further questions or are having difficulties using the Consultation Portal please contact us at planning.policy@chelmsford.gov.uk or call 01245 606330 during normal office hours and one of the team can assist you.

Please note you will need to add your comments through the representation form for each paragraph, policy, map, table, figure or appendix etc. you wish to comment on. Full guidance on how to make your comments are included within our User Guide: www.chelmsford.gov.uk/lp-portal-guide

The events on the Consultation Portal are as follows:

1. Local Plan Regulation 19 Pre-Submission Consultation 2025 – Use this event if you want to make comments on multiple policies/paragraphs/maps etc of the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document. You can read and make your comments on each part of the document as you go through it using the representation form.

2. Local Plan Regulation 19 Pre-Submission Consultation Questionnaire 2025 – Here you can read the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document as a pdf and then make comments on individual policies/paragraphs/maps etc. You will need to complete this representation form multiple times if you wish to make comments on multiple parts of the document. Each time you complete it you must state which policy/paragraph/map etc of the document your comments relate to.

3. Local Plan Regulation 19 Pre-Submission Integrated Impact Assessment 2025 – Here you can read the Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment (IIA) as a pdf and then make comments on individual paragraphs/figures/tables of the document. You will need to complete this representation form multiple times if you wish to make comments on multiple parts of the IIA. Each time you complete it you must state which paragraph/figure/tables etc of the IIA your comments relate to.

4. Co-Living Housing Planning Advice Note Consultation – Here you can read the document as a pdf and then make comments on individual paragraphs/figures/tables of the Advice Note. You will need to complete this representation form multiple times if you wish to make comments on multiple parts of the Advice Note. Each time you complete it you must state which paragraph/figure/tables etc of the Advice Note your comments relate to.

5. Consultation Draft Planning Obligations Supplementary Planning Document – Here you can read the document as a pdf and then make comments on individual paragraphs/figures/tables of the Planning Obligations Supplementary Planning Document (SPD). You will need to complete this representation form multiple times if you wish to make comments on multiple parts of the SPD. Each time you complete it you must state which paragraph/figure/tables etc of the SPD your comments relate to.

Representations are invited for a period of six weeks, up to 4pm on 18 March 2025. Comments received outside of this period will not be accepted. The Council is unable to make exceptions or allowances for postal delays or external problems with electronic communications. So please try to reply well ahead of the final deadline.

For all the above events please remember to save your comments as you go.

In writing:
If you prefer to send comments in writing, please fill in the relevant specially designed representation forms for each consultation event.

We will then record your comments on the Consultation Portal, to make sure they are dealt with alongside the online comments.

Local Plan representation forms cover the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document and the Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment consultations.

The Local Plan representation forms can be downloaded at www.chelmsford.gov.uk/lp-review. Paper copies of these representation forms for are also available from Chelmsford City Council's Customer Service Centre, Civic Centre, Duke Street, Chelmsford, CM1 1JE (10am to 4pm Monday to Friday). Paper copies can also be made available on request by telephoning (01245) 606330 or emailing planning.policy@chelmsford.gov.uk

Forms can be returned:

- By e-mail to planning.policy@chelmsford.gov.uk
- By post to Planning Policy, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE
- By hand to Chelmsford City Council Customer Service Centre (details above).

The use of the Local Plan representation forms is strongly recommended as this will ensure that comments are related to the matters relevant to the subsequent Independent Examination by a Planning Inspector.

If you wish to submit a representation on more than one issue in the Local Plan, please complete a Local Plan representation form continuation sheet as provided for each issue.

If you have difficulties making representations by e-mail or post due to a disability, please call 01245 606330. Documents can be made available in alternative format including large print, audio and other languages. Please call (01245) 606330, or email planning.policy@chelmsford.gov.uk

Please do not submit multiple copies of the same response (e.g. online and email, or online and hardcopy).

General advice on making representations on the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document:

If you wish to make a representation seeking a modification to the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document (the 'Plan') or part of the Plan you should set out clearly in what way you consider the Plan or part of the Plan is legally non-compliant or unsound, having regard to the soundness criteria set out above in Part 3. Your representation should be supported by evidence wherever possible. It will be helpful if you also say succinctly and precisely how you think the plan should be modified.

You should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification. If you are submitting a representation of significant length, please provide a summary of not more than 200 words. We will request a summary in appropriate circumstances if it is not originally provided. You should not assume that you will have a further opportunity to make submissions. Any further submissions after the Plan has been submitted for Independent Examination may only be made if invited by the Inspector, based on the matters and issues they identify.

The Planning Inspectorate advise that where groups or individuals share a common view on the plan, it would be very helpful if they would make a single representation which represents that view, rather than a large number of separate representations repeating the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

If you are organising a petition or intend to, or have signed one, it must be submitted by 4pm on 18 March 2025 and be accompanied by the name and contact details for the petition organiser. The Council will register the petition organiser on the Consultation Portal. Acknowledgement of the petition and any future Local Plan notifications will only be sent to the petition organiser. Petitions should include the names and addresses of all who support the petition. The number of signatories will be recorded and attributed to relevant representations, but names, addresses and signatures themselves will not be published.

Please consider carefully how you would like your representation to be dealt with in the Independent Examination: whether you are content to rely on your written representation, or whether you wish to take part in hearing session(s). Please remember only representors who are seeking a change to the Plan can be heard at the hearing session(s), and it is the Planning Inspector's decision on who will participate and be heard at the Independent Examination. In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the Independent Examination process.

Representations about the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document (the 'Plan') may be accompanied by a request to be notified at a specified address of any of the following:

i. The submission of the Plan to the Secretary of State Secretary of State for Levelling Up, Housing and Communities for Independent Examination
ii. Publication of the Planning Inspector's Report on the Plan
iii. Adoption of the Local Plan 2022- 2041

These requests can be made by completing the relevant section of the Local Plan representation form.

General advice on making representations to all consultation events:

If you are uploading additional supporting documents, please ensure they contain no signatures, e-mail addresses or personal postal addresses.

Please note we are unable to accept anonymous representations. It is a requirement of the Local Plan process that comments can only be deemed legitimate ("duly made") if they are received in a written format with a name and address supplied. Comments made verbally, anonymously, or outside of the consultation period cannot be accepted.

Section 149 of the Equality Act 2010 requires that the Council should avoid any form of discrimination and foster good relations between different ethnic groups. Comments which are deemed to be discriminatory, racist, inflammatory or derogatory, or include information which

comprises personal or sensitive information e.g. health information, details about a criminal record, or religious beliefs, will not be accepted. We would ask that you avoid the use of such comments when making your representations.

PART 6 - Appearing at Independent Examination

The Local Plan representation form asks whether you consider it necessary to take part and speak at the Independent Examination hearing if your representation is seeking a modification to the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document (the 'Plan'). Please remember it is the Planning Inspector's decision on who will participate and be heard at the Independent Examination. It is acceptable to submit just a written submission if you feel this adequately covers all your points as all the representations will be submitted to the Planning Inspector and considered as part of the Independent Examination.

There will be no examination of the Consultation Draft Planning Obligations Supplementary Planning Document, or the Co-Living Planning Advice Note.

PART 7 - What will happen with my representation?

For all consultation events the Council will acknowledge receipt of all duly received representations, although the Council will not enter into individual correspondence. All representations will be recorded and published on the Consultation Portal at www.chelmsford.gov.uk/planningpolicyconsult

Comments will be published with the respondent's name, organisation and agent (where applicable). No other personal details will be made public. Data will be held in accordance with the Data Protection Act 1998 and the General Data Protection Regulations. For more information please visit the Council's Privacy Policy web page: www.chelmsford.gov.uk/your-council/about-our-website/privacy-policy-and-notices/privacy-policy/

A copy of all duly made representation(s) to the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document and Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector). These representations will be 'made available' in line with the Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20, 22 and 35). This includes publication on the Council's Consultation Portal.

Following the consultation, feedback reports will be produced setting out the main issues raised to the documents.

PART 8 – Statement on availability of proposed submission documents for inspection

The following documents are defined in Regulation 17 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) as the "proposed submission documents":

i. Chelmsford Local Plan – Pre-Submission (Regulation 19) Document and its Policies Map
ii. Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment
iii. Issues and Options You Said We Did Feedback Report
iv. Preferred Options You Said We Did Feedback Report

These documents are available for inspection in line with Part 4.

In addition to these proposed submission documents, a number of supporting evidence based documents are published to view on our website at www.chelmsford.gov.uk/lp-review

PART 9 – Other consultations

We are also consulting on two additional planning consultations as outlined below:

Co-Living Housing Planning Advice Note Consultation

Co-living housing proposals have the potential to meet a specific demand and need for housing. However, by doing so the Council needs to ensure that this does not result in sub-standard accommodation creating unacceptable living conditions for future residents. The Planning Advice Note seeks to provide practical guidance to potential promoters or developers of co-living housing in Chelmsford, to ensure they meet the Council's expectation in this regard.

Consultation Draft Planning Obligations Supplementary Planning Document

The Consultation Draft Planning Obligations Supplementary Planning Document (SPD) sets out how the Council will seek planning obligations when considering planning applications. The adopted SPD was published in January 2021 and has been updated to reflect proposed changes in the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document as well as changes in national planning policy. It refers to the latest published Infrastructure Delivery Plan and integrates and updates some published Planning Advice Notes.

How to make your comments

Both the draft Planning Advice Note and SPD will be subject to the same six-week public consultation period alongside the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document and the Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment consultations. See Part 5 above for full details about how to make your comments.

Next steps

Following the consideration of the consultation responses, the Co-Living Housing Planning Advice Note will be finalised for consideration by the Council's Cabinet in the Spring of 2025. If approved, it will then be used by the Council as a material consideration in the determination of planning applications.

Following the consultation on the Draft Planning Obligations Supplementary Planning Document, a summary of the consultation feedback and how the feedback will be addressed in the document will be reported to Chelmsford Policy Board before the document is submitted as an evidence base document supporting the Independent Examination of the Plan. The final version of the SPD is not expected to be published until the Local Plan is adopted. This will allow for any modifications made by the Inspector to be incorporated into the SPD.

Directorate for Sustainable Communities
Spatial Planning Services

Spatial Planning Services
Civic Centre, Duke Street, Chelmsford,
Essex CM1 1JE

Date: 4 February 2025
PID number: «Person_ID»
Username: «Username»

Dear Consultee,

New Consultation Events –

- **Chelmsford Local Plan – Pre-Submission (Regulation 19) Document**
- **Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment Consultation**
- **Consultation Draft Planning Obligations Supplementary Planning Document, and**
- **Co-Living Housing Planning Advice Note**

I am writing to you as you as a registered consultee on Chelmsford City Council's Local Plan consultation database.

Please be advised that the City Council is publishing the above documents for consultation for six weeks from: 10am on Tuesday 4 February 2025 to 4pm on Tuesday 18 March 2025**.**

Local Plan

The next stage in the Review of the Chelmsford Local Plan is to consult on the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document.

What is the adopted Local Plan and why are we reviewing it?
The Local Plan shapes future growth and development across Chelmsford City Council's area. It sets out a positive vision, identifies where and how new development should take place in the future as well as areas for protection. We adopted our current Local Plan in May 2020. We need to review the plan at least every five years to make sure it remains up to date and meets the changing needs for development growth to 2041. The Government revised the National Planning Policy Framework (NPPF) in December 2024 but our Local Plan is able to continue under transitional arrangements meaning it will be examined against the previous December 2023 NPPF.

What is the Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment?
The Review of the Adopted Chelmsford Local Plan: Integrated Impact Assessment assesses the sustainability, health, and equality performance of the Plan.

What are we consulting on?
Following on from previous consultations in 2022 and 2024, we are consulting on the final draft Local Plan before it is submitted for examination by a government-appointed independent Planning Inspector.

We are consulting on the:

- Chelmsford Local Plan – Pre-Submission (Regulation 19) Document
- Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment (IIA)

How do I get involved?
To ensure that comments are submitted in a format required by the Planning Inspector, it is important that you identify whether you support or object to the Pre-Submission (Regulation 19) Local Plan, whether the Council has met the legal requirements, including the Duty to Co-operate and whether it meets the tests of soundness set out in the national policy (National Planning Policy Framework). Plans are sound if they are:

- **Positively prepared** – provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common grounds; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

We prefer receiving comments online, using our specially designed Consultation Portal. Using the Consultation Portal helps us to record your comments accurately and process them quickly. Go to www.chelmsford.gov.uk/planningpolicyconsult to:

- Read the consultation documents
- Make your comments
- Sign up for alerts to future consultations.

Otherwise, representations should be made on a specially designed response form available online at www.chelmsford.gov.uk/lp-review or a paper copy can be provided by phoning (01245) 606330. **The use of the standard representation form is strongly recommended as this will ensure that comments are related to the matters relevant to the subsequent examination by a Planning Inspector.**

Responses can also be made by email and in writing.

See the enclosed Statement of Representation Procedure and Statement on Availability of Proposed Submission Documents for full details about what the documents cover and how to make your comments.

More information

- Read our newsletter which summaries the consultation (enclosed)

- Meet with planning staff face-to-face at a public drop-in exhibition (see the Statement of Representation Procedure and Statement on Availability of Proposed Submission Documents for details)
- Visit our website for further information such as the frequently asked questions www.chelmsford.gov.uk/lp-review
- Email us at planning.policy@chelmsford.gov.uk or call 01245 606330.

Next Steps
All responses will be submitted to the Planning Inspector, alongside the Pre-Submission (Regulation 19) Local Plan and evidence base. The Council will produce a summary of the main issues raised in the consultation responses for the Planning Inspector and publish this online.

All duly-made comments will be published on the Council's Consultation Portal in accordance with the Data Protection Act and General Data Protection Regulations. To be duly made, you need to provide your name and address with your comment. Anonymous comments will not be accepted.

Your name, your comments and any information provided, including supporting documents, will be available for public inspection and published online. We will not publish any personal details.

Section 149 of the Equality Act 2010 requires that the Council should avoid any form of discrimination and also foster good relations between different ethnic groups. We will not display, share or consider any comments that are inappropriate, including those that are racist, inflammatory or derogatory. Any such comments will be considered as inadmissible and will not be accepted.

Further general information on the Local Plan can be found on the Council's website at https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-local-plan/

Additional Consultations
We are also consulting on two additional planning consultations as outlined below.

Consultation Draft Planning Obligations Supplementary Planning Document

The Consultation Draft Planning Obligations Supplementary Planning Document (SPD) sets out how the Council will seek planning obligations (such as financial contributions towards site improvements) when considering planning applications. The adopted SPD was published in January 2021 and has been updated to reflect proposed changes in the Pre-Submission (Regulation 19) Local Plan as well as changes in national planning policy. It refers to the latest published Infrastructure Delivery Plan and integrates and updates some published Planning Advice Notes.

The SPD will be subject to the same six-week public consultation period alongside the Pre-Submission (Regulation 19) Local Plan. See the enclosed Statement of Representation Procedure and Statement on Availability of Proposed Submission Documents for full details about how to make your comments.

Following the consideration of the consultation responses, the final version of the SPD will be finalised for consideration by the Council's Cabinet. If approved, it can then be used by the Council as a material consideration in the determination of planning applications.

Co-Living Housing Planning Advice Note Consultation

Co-living housing is a form of communal living. It has the potential to meet a specific demand and need for housing. However, by doing so the Council needs to ensure that this does not result in sub-standard accommodation creating unacceptable living conditions for future residents. The Planning Advice Note seeks to provide practical guidance to potential promoters or developers of co-living housing in Chelmsford, to ensure they meet the Council's expectation in this regard.

The draft Planning Advice Note will be subject to the same six-week public consultation period alongside the Pre-Submission (Regulation 19) Local Plan. See the enclosed Statement of Representations Procedure and Statement on Availability of Proposed Submission Documents for full details about how to make your comments.

Following the consideration of the consultation responses, the final version of the Co-Living Housing Planning Advice Note will be finalised for consideration by the Council's Cabinet. If approved, it can then be used by the Council as a material consideration in the determination of planning applications.

Please note:

- **We are unable to accept anonymous representations**
- **Any late comments received after 4pm on Tuesday 18 March 2025 cannot be accepted**
- **Individual acknowledgement of receipt will not be possible**.

Updating your details

If you no longer wish to remain on our consultation database or if your contact details have changed, please contact us on 01245 606330.

You may prefer to submit/manage/view your comments online through the planning policy Consultation Portal. We will then keep you informed of progress of the Local Plan by email, and you can easily view and comment on consultations. It's simple to transfer to the online system - please call us on 01245 606330.

Yours faithfully,

Jeremy Potter

Spatial Planning Services Manager

PID Number: «Person_ID»
Username: «Username»

Dear Consultee

New Consultation Events –

- **Chelmsford Local Plan – Pre-Submission (Regulation 19) Document**
- **Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment Consultation**
- **Consultation Draft Planning Obligations Supplementary Planning Document, and**
- **Co-Living Housing Planning Advice Note**

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What is the Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment?
The Review of the Adopted Chelmsford Local Plan: Integrated Impact Assessment assesses the sustainability, health, and equality performance of the Plan.

What are we consulting on?
Following on from previous consultations in 2022 and 2024, we are consulting on the final draft Local Plan before it is submitted for examination by a government-appointed independent Planning Inspector.

We are consulting on the:

- Chelmsford Local Plan – Pre-Submission (Regulation 19) Document
- Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment (IIA)

How do I get involved?
To ensure that comments are submitted in a format required by the Planning Inspector, it is important that you identify whether you support or object to the Pre-Submission (Regulation 19) Local Plan, whether the Council has met the legal requirements, including the Duty to Co-operate and whether it meets the tests of soundness set out in the national policy (National Planning Policy Framework). Plans are sound if they are:

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See the Statement of Representation Procedure and Statement on Availability of Proposed Submission Documents for full details about what the documents cover and how to make your comments.

More information

- Read our newsletter which summaries the consultation
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- Visit our website for further information such as the frequently asked questions www.chelmsford.gov.uk/lp-review
- Email us at planning.policy@chelmsford.gov.uk or call 01245 606330.

Next Steps
All responses will be submitted to the Planning Inspector, alongside the Pre-Submission (Regulation 19) Local Plan and evidence base. The Council will produce a summary of the main issues raised in the consultation responses for the Planning Inspector and publish this online.

All duly-made comments will be published on the Council's Consultation Portal in accordance with the Data Protection Act and General Data Protection Regulations. To be duly made, you need to provide your name and address with your comment. Anonymous comments will not be accepted.

Your name, your comments and any information provided, including supporting documents, will be available for public inspection and published online. We will not publish any personal details.

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Further general information on the Local Plan can be found on the Council's website at https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-local-plan/

Additional Consultations

We are also consulting on two additional planning consultations as outlined below.

Consultation Draft Planning Obligations Supplementary Planning Document

The Consultation Draft Planning Obligations Supplementary Planning Document (SPD) sets out how the Council will seek planning obligations (such as financial contributions towards site improvements) when considering planning applications. The adopted SPD was published in January 2021 and has been updated to reflect proposed changes in the Pre-Submission (Regulation 19) Local Plan as well as changes in national planning policy. It refers to the latest published Infrastructure Delivery Plan and integrates and updates some published Planning Advice Notes.

The SPD will be subject to the same six-week public consultation period alongside the Pre-Submission (Regulation 19) Local Plan. See the Statement of Representation Procedure and Statement on Availability of Proposed Submission Documents for full details about how to make your comments.

Following the consideration of the consultation responses, the final version of the SPD will be finalised for consideration by the Council's Cabinet. If approved, it can then be used by the Council as a material consideration in the determination of planning applications.

Co-Living Housing Planning Advice Note Consultation

Co-living housing is a form of communal living. It has the potential to meet a specific demand and need for housing. However, by doing so the Council needs to ensure that this does not result in sub-standard accommodation creating unacceptable living conditions for future residents. The Planning Advice Note seeks to provide practical guidance to potential promoters or developers of co-living housing in Chelmsford, to ensure they meet the Council's expectation in this regard.

The draft Planning Advice Note will be subject to the same six-week public consultation period alongside the Pre-Submission (Regulation 19) Local Plan. See the Statement of Representations Procedure and Statement on Availability of Proposed Submission Documents for full details about how to make your comments.

Following the consideration of the consultation responses, the final version of the Co-Living Housing Planning Advice Note will be finalised for consideration by the Council's Cabinet. If approved, it can then be used by the Council as a material consideration in the determination of planning applications.

Please note:

- **We are unable to accept anonymous representations**
- **Any late comments received after 4pm on Tuesday 18 March 2025 cannot be accepted**
- **Individual acknowledgement of receipt will not be possible**.

Updating your details

If you no longer wish to remain on our consultation database or if your contact details have changed please contact us on 01245 606330 or update your record at http://consult.chelmsford.gov.uk/portal

Your username is at the top of this email. If you have forgotten your login details or for other information about the Consultation Portal, please see our Guidance Notes available at: https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-local-plan/consultations-on-planning-policy/how-to-use-the-consultation-portal/

Yours faithfully

Jeremy Potter

Spatial Planning Services Manager

Chelmsford City Council

Listen

Search site

Search

Local Plan: Pre-Submission Consultation

We are reviewing our adopted Local Plan, and so are consulting on the Pre-Submission stage now. The consultation closes at 4pm on Tuesday 18 March 2025.

Local Plan Review

We are reviewing our adopted Local Plan. We are currently consulting on the Chelmsford Local Plan: Pre-Submission (Regulation 19) Document. The consultation period closes on Tuesday 18 March 2025.

This is our third and final stage of public consultation on the final draft Local Plan before we submit it for Independent Examination by a government-appointed Planning Inspector.

As part of the consultation, we are also asking for views on the Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment. We are also consulting separately on two further planning documents.

This is a separate process to making comments on planning applications. You can view and comment on any current planning applications.

Pre-submission consultation stage

How to have your say

You can view the Local Plan review consultation documents on our specially designed Planning Policy consultation portal.

Chelmsford Local Plan

Also in this section

- Adopted Local Plan
- Request housing and planning policy advice
- Brownfield register
- Self-build, custom build and community-led housing

We prefer receiving comments through the consultation portal. This ensures that your comments are recorded accurately and are processed quickly. You can also download the consultation documents and sign up for consultation alerts.

You can find out more about how to use the Planning Policy consultation portal.

You can also read detailed ↓ guidance on how to make your comments on these Local Plan consultation events.

Commenting on individual planning applications

This Local Plan consultation is a separate process to making comments on a planning application. You can find out how to comment on a planning application.

Documents we are consulting on

- Call for sites, SHELAA and parish maps
- Consultations on planning policy
- Essex Coast RAMS
- Involving communities and organisations
- Livewell Development Accreditation Scheme
- Monitoring development
- Neighbourhood Plans and Village Design Statements
- Supplementary Planning Documents and planning advice notes

Chelmsford Local Plan: Pre-Submission (Regulation 19) Document

This is the main consultation document, where we include sites where new homes, jobs and other facilities will be located as well as areas for protection.

We also include updated and new policies that we will use to decide planning applications. The document also includes a Policies Map which shows where the planning policies apply.

You can click on event 1 in the consultation portal to read and make comments on the document as you go. We need you to consider whether the Pre-Submission Document is legally compliant and consistent with national policy, and answer specific consultation questions on this.

Contact Planning Policy

Contact the team online

01245 606330

Chelmsford Local Plan: Pre-Submission (Regulation 19)

Questionnaire

This is a simple questionnaire on the main consultation document. You can click on event 2 in the consultation portal if you have read the consultation document and just want to make your comments in one place.

We need you to consider whether the Pre-Submission Document is legally compliant and consistent with national policy, and answer specific consultation questions on this.

Pre-Submission Integrated Impact Assessment (IIA)

This includes environmental, habitats, quality and health assessments of the impacts of the Pre-Submission Local Plan.

You can click on event 3 in the consultation portal to view and comment on the IIA.

Co-Living Housing Planning Advice Note Consultation

This provides practical guidance to potential promoters or developers of co-living housing in Chelmsford.

You can click on event 4 in the consultation portal to view and comment on the Planning Advice Note.

Consultation Draft Planning Obligations Supplementary Planning Document (SPD)

This sets out how we will seek planning obligations such as financial contributions towards important site improvements when considering planning applications.

You can click on event 5 in the consultation portal to view and comment on the SPD.

Download the documents

You can view the Local Plan review consultation documents on our specially designed Planning Policy consultation portal.

Otherwise you can download them. These documents are large in size. You may find it easier to download and view these documents on a desktop computer, rather than on a smartphone or tablet.

- Pre Submission (Regulation 19) Local Plan Consultation Document
- Pre Submission Integrated Impact Assessment (IIA)
- Co Living Housing Planning Advice Note
- Consultation Draft Planning Obligations Supplementary Planning Document (SPD)
- Co Living Housing Planning Advice Note Equality Impact Assessment

Supporting documents

Before making your comments, we recommend you read the guidance contained in the Pre-Submission (Regulation 19) Statement of Representation Procedure and Statement on Availability of Proposed Submission Documents for Inspection

This includes the 'Tests of Soundness' that your comments should address, including legal compliance and consistency with national policy. These are the broad areas that the Planning Inspector will focus on in examining the Local Plan.

We have published feedback reports from the earlier consultation stages:

↓ Issues and Options 'You Said We Did' Feedback Report (May 2024)

↓ Preferred Options 'You Said We Did' Feedback Report (February 2025)

You can see a list of all the adopted and allocated sites (↓ Sites at a Glance), with a note of which Policies Map section they are shown on. The Policies Maps are included at Section 11 of the ↓ Local Plan Pre-Submission Options Consultation Document.

Topic papers

We have produced several Topic Papers to set out how the review of the Local Plan has been developed. We will refresh and update them at each stage of the review process to ensure the latest information/position is available.

Topic Papers provide background information, but they do not contain any policies, proposals or site allocations. They will form part of the Local Plan evidence base which we will submit alongside the Local Plan for independent examination.

- Pre Submission Topic Paper Climate Change (February 2025) ↓
- Pre Submission Topic Paper Employment (February 2025) ↓

Pre Submission Topic Paper Health and Wellbeing (February 2025)

Pre Submission Topic Paper Historic Environment (February 2025)

Pre Submission Topic Paper Housing (February 2025)

Pre Submission Topic Paper Infrastructure (February 2025)

Pre Submission Topic Paper Spatial Strategy and Strategic Sites (February 2025)

Pre Submission Topic Paper Transport (February 2025)

Other ways to comment

We prefer receiving comments through the consultation portal. This ensures that your comments are recorded accurately and are processed quickly. You can also download the consultation documents and sign up for consultation alerts.

You can find out more about how to use the Planning Policy consultation portal.

If you prefer to send comments in writing, you can print and fill in the relevant specially-designed representation forms for each consultation event.

The representation forms are for the:

- ↓ Pre-Submission (Regulation 19) Document
- ↓ Continuation form for the Pre-Submission (Regulation 19) Document
- ↓ Integrated Impact Assessment
- ↓ Continuation form for the Integrated Impact Assessment
- ↓ Co-Living Planning Advice Note
- ↓ Draft Planning Obligations Supplementary Planning Document

We will then record your comments on the Consultation Portal, to make sure they are dealt with alongside the online comments.

You can collect a paper copy of these representation forms from our Customer Service Centre, or you can request one by phone on 01245 606330 or by email.

You can also make comments:

- by e-mail to planning.policy@chelmsford.gov.uk
- by post to Planning Policy, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE
- by hand at our Customer Service Centre

If you have difficulties commenting due to a disability, you can call 01245 606330. We can make documents available in alternative formats, including large print, audio and other languages, on request by phone on (01245) 606330 or by email.

How to find out more

You can:

- view our What is a Local Plan? video

- download a copy of the ↓ FAQs
- read our ↓ Pre-Submission Local Plan Newsletter
- read our ↓ Integrated Impact Assessment Newsletter
- view our ↓ exhibition panels

You can also visit one of our exhibitions in person.

We will be holding a staffed exhibition in our Council Chamber at the Civic Centre on:

- Thursday 27 February, from 6pm to 8pm
- Friday 28 February, from 2pm to 4pm
- Saturday 1 March, from 10am to 12 noon

You can also view an unstaffed exhibition at:

- the High Chelmer Shopping Centre from Monday 24 February to Sunday 2 March, between 7am and 6.30pm
- South Woodham Ferrers Town Council, Champions Manor Hall, Hullbridge Road, SWF from Thursday 13 February to

Tuesday 25 February, between 9am and 4pm (excluding weekends)

After the consultation closes

We will acknowledge receipt of all 'duly made' representations to all the consultation events, but we will not enter into individual correspondence. We will record and publish all comments on the Consultation Portal .

We will send all comments about the Chelmsford Local Plan: Pre-Submission (Regulation 19) Document, and Pre-Submission Integrated Impact Assessment (IIA), to the Planning Inspectorate for Independent Examination. We will also publish feedback reports.

Once we have considered the consultation responses, we will finalise the Co-Living Housing Planning Advice Note in spring 2025.

We will prepare a feedback report on the Consultation Draft Planning Obligations Supplementary Planning Document (SPD), and submit the document as evidence for the Independent

Examination. We expect to publish a final version when we adopt the Local Plan.

Evidence Base: Pre-Submission

We are developing a range of new and updated evidence to support the Local Plan review. We will publish the evidence base here as we develop it. You can search by name and/or category.

If you search by name or reference number, you can do this with or without choosing the category.

Alternatively, you can list all the documents in a category by choosing the category from the drop-down list and clicking on search.

We used several evidence base documents to support the adopted Local Plan. Many of these are still relevant or we will be updating them during the Local Plan review. Although they do not form part of this consultation, you can still view the evidence base for the Adopted Local Plan.

Search by name or reference **Category**

All

Search Reset

Document	Category
AH001 Chelmsford Strategic Housing Needs Assessment	Delivering affordable homes for all
AH002 Housing Capacity in Chelmsford City Centre and Urban Area 2024	Delivering affordable homes for all
AH003 Chelmsford Gypsy and Traveller Accommodation Assessment (GTAA) 2024	Delivering affordable homes for all
AH004 Chelmsford Strategic Housing Needs Assessment Addendum (November 2024)	Delivering affordable homes for all
BG001 Chelmsford Local Wildlife Sites Review 2024	Increasing biodiversity and green spaces

Document	Category
BG002 Chelmsford Local Wildlife Sites Review (November 2024)	Increasing biodiversity and green spaces
BG003-A Open Space, Sport & Recreation Study – Executive Summary (December 2024)	Increasing biodiversity and green spaces
BG003-B Open Space Study (December 2024)	Increasing biodiversity and green spaces
BG003-C Indoor Sports Assessment & Strategy – Needs Assessment (December 2024)	Increasing biodiversity and green spaces
BG003-D Indoor Sports Assessment & Strategy – Strategy & Action Plan (December 2024)	Increasing biodiversity and green spaces
BG003-E Playing Pitch & Outdoor Sport Strategy – Assessment Report (December 2024)	Increasing biodiversity and green spaces

Document	Category
BG003-F Playing Pitch & Outdoor Sport Strategy – Strategy & Action Plan (December 2024)	Increasing biodiversity and green spaces
CC001: Strategic Flood Risk Assessment 2024 (Level 1)	Addressing the climate change emergency
CC002: Water Cycle Study, Scoping 2024	Addressing the climate change emergency
CC003: Water Cycle Study, Stage 2 Detailed Study 2024	Addressing the climate change emergency
CC004 Essex Open Legal Advice – Energy Policy and Building Regulations 2024	Addressing the climate change emergency
CC005 Report 1: Essex Net Zero Policy – Technical Evidence Base 2023	Addressing the climate change emergency

Document	Category
CC006 Report 2: Essex Net Zero Policy – Summary of Policy, Evidence and Validation Requirements 2023	Addressing the climate change emergency
CC007-A Net Zero Carbon Viability Study for Essex – Summary report 2022	Addressing the climate change emergency
CC007-B Net Zero Carbon Viability Study for Essex – Main report 2022	Addressing the climate change emergency

< 1 2 3 4 5 6 >

Other useful information

Local Plan review stages

We adopted our current Local Plan in May 2020. It guides growth and development across Chelmsford City Council's area to 2036. We need to review the plan at least every five years, to see if we need to update it. The review means that the Local Plan will now run until 2041.

Issues and Options (previous stage)

This was the first stage of consultation, which took place in 2022. Many people and organisations commented, and we have carefully considered all the responses, alongside updated evidence, national planning policy, new local priorities, and monitoring data.

You can read an ↓ Issues and Options feedback report which sets out the consultation feedback we received on the Issues and Options consultation and how we have taken the comments into account when preparing the Preferred Options Local Plan.

Preferred Options (previous stage)

This consultation was the second formal stage in the preparation of the review plan, and involved residents, businesses, developers, and other interested parties.

We have published a ↓ Preferred Options feedback report setting out a review of the consultation activity, a summary of the representations we received, and how these comments have been used to develop the Pre-Submission Local Plan document.

Pre-Submission (current stage)

This consultation is the third formal stage in the preparation of the review plan. This consultation focuses on legal compliance and consistency with national planning policy.

The consultation runs for a period of six weeks from 10am on Tuesday 4 February 2025 to 4pm on Tuesday 18 March 2025.

Submission (future stage)

This is the formal Submission of the Local Plan. We will submit all plan documents, evidence, and comments to the Planning Inspector for an Independent Examination.

Neighbourhood Plan consultations

We recently consulted on two Neighbourhood Plans. These have been developed by Broomfield and Danbury Parish Councils and cover a wide range of issues such as landscape, transport, recreation, heritage, building design, and business.

Both the Danbury Neighbourhood Plan and the Broomfield Neighbourhood Plan have been made (adopted).

You can view the:

- Broomfield Neighbourhood Plan
- Danbury Neighbourhood Plan

Integrated Impact Assessment

We will continue to assess the Local Plan as we review it, to make sure it contributes towards sustainability. We will assess the following aspects of sustainable development:

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

The IIA assesses the issues and options against a range of social, environmental and economic indicators and helps to identify all the likely significant effects. The IIA advises on ways in which any adverse effects could be avoided, reduced or mitigated or how any positive effects could be maximised. This helps to ensure that the emerging policies, plans and allocations in the Local Plan are promoting sustainable development.

Call for Sites and SHELAA

We use the Strategic Housing and Employment Land Availability Assessment (SHELAA) to assess sites nominated by landowners, promoters and developers. This helps us when researching and developing future Local Plans.

The SHELAA 2023/2024 is our latest published assessment. This assesses the sites put forward to us for consideration as part of the Local Plan Review. You can view the outcomes of that assessment.

The SHELAA is open all year round, meaning you can submit a new site or amend an existing site on a rolling basis. We aim to assess submissions yearly. We anticipate that the next cut-off point for submissions will be spring 2025.

You can submit a site for future assessment, or amend an already submitted site, through the current SHELAA facility.

You can find out more about
how to submit or amend a site, and see the latest assessment outcomes
.

Using the consultation portal

We have a specially designed consultation portal for Local Plan and other planning policy consultations.

If you register, you can:

- read and save consultation documents
- make your comments online
- receive alerts on future consultations

You can find out more about how to use the consultation portal.

Local Development Scheme

We use the Local Development Scheme (LDS) to manage the plan-making process. It sets out our timetable for preparing the documents and for consulting on the Local Plan review.

We first adopted an LDS in 2006 and we have reviewed it regularly as we have made progress on producing our Local Plan.

This LDS is the ninth review. You can download the ↓ Chelmsford Local Development Scheme 2023-2028.

You can also download the ↓ eighth review of the LDS, which we published in November 2021. You can view the changes we have made since November 2021 in Appendix 1 of the 2023-2028 LDS document.

Duty to Co-operate

We are committed to working with other councils and key organisations on planning issues that cross council boundaries.

The organisations we regularly work with include Essex County Council, National Highways, environmental organisations and education providers.

We have to ensure that we properly co-ordinate strategic issues such as:

- land for new homes and jobs
- infrastructure
- providing schools
- mitigating climate change

We have adopted a Duty to Co-operate Strategy, which sets out who we will co-operate with and when, plus how we will do it.

You can download the Duty to Co-operate Strategy.

Is there something wrong with this page?

Last updated: 07 March 2025

Chelmsford City Council

Search site

Consultations

We hold consultations on important issues in the Chelmsford area, so that local people can shape where they live and the services they receive.

Our ↓ Consultation and Engagement Strategy outlines our long-term approach to:

- involving residents in a consistent and coordinated way
- using corporate standards
- adopting innovative approaches

Also in this section

- Feedback about our services
- Petitions

- following best practice

Our strategy ensures that our consultations are inclusive, accessible and a worthwhile experience for everyone involved.

Current consultations

Local Plan Review

We need to review our Local Plan every five years. We are currently consulting on the Chelmsford Local Plan: Pre-Submission (Regulation 19) Document until 18 March 2025. Find out more about the Local Plan Review.

Public Spaces Protection Orders (PSPO) for Chelmsford City Centre

Whistleblowing (report wrongdoing by council staff)

Contact Democratic Services

Contact the team online

01245 606480

We are currently asking for your view on extending the Chelmsford City Centre PSPO.

We are proposing to extend the PSPO for a further three years, from 11 April 2025. this will allow us to can continue to control the prohibited activities outlined in the PSPO, to ensure the quality of life of those who live, visit, and work in the city centre.

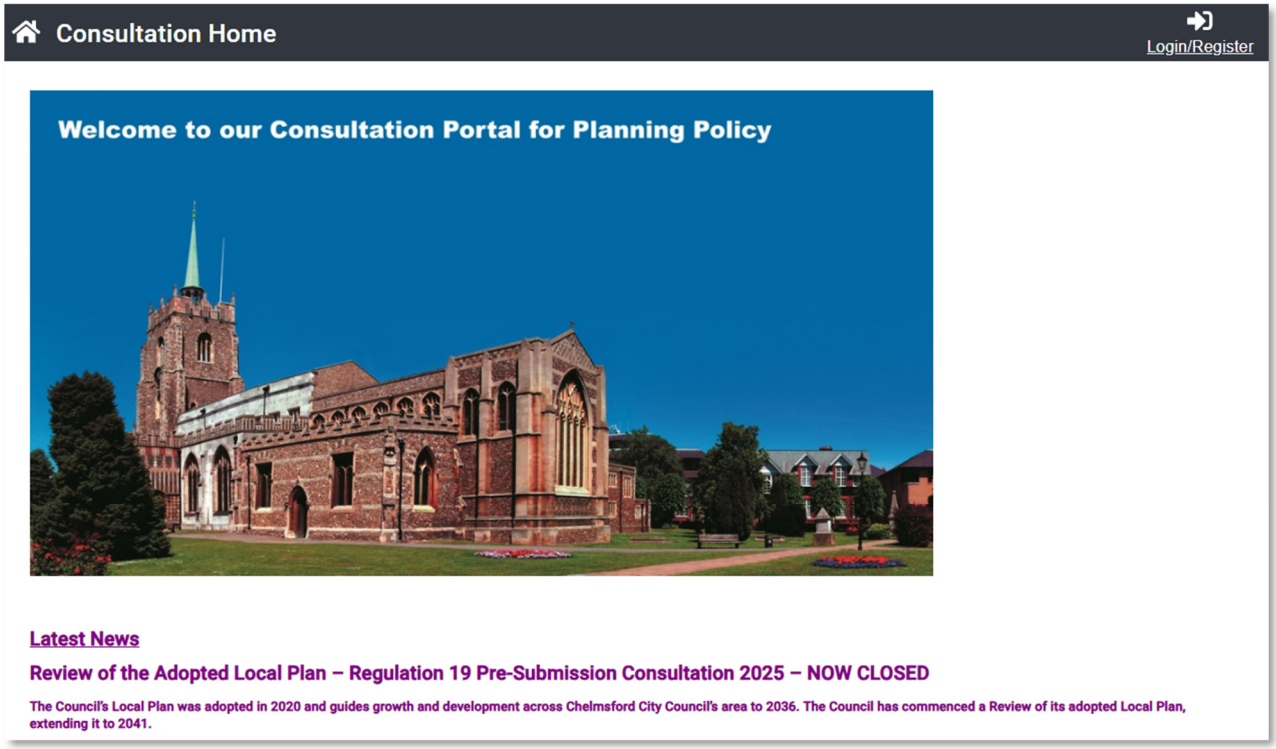
You can ↓ view the proposed order, and comment on the PSPO online.

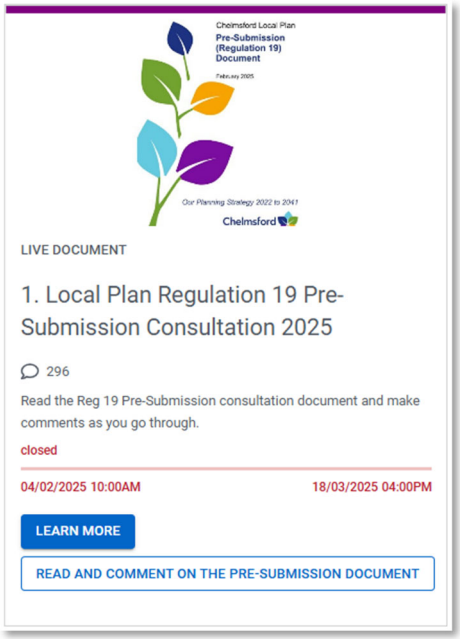
You need to submit any comments on the proposed PSPO by 5pm on Monday 24 March 2025.

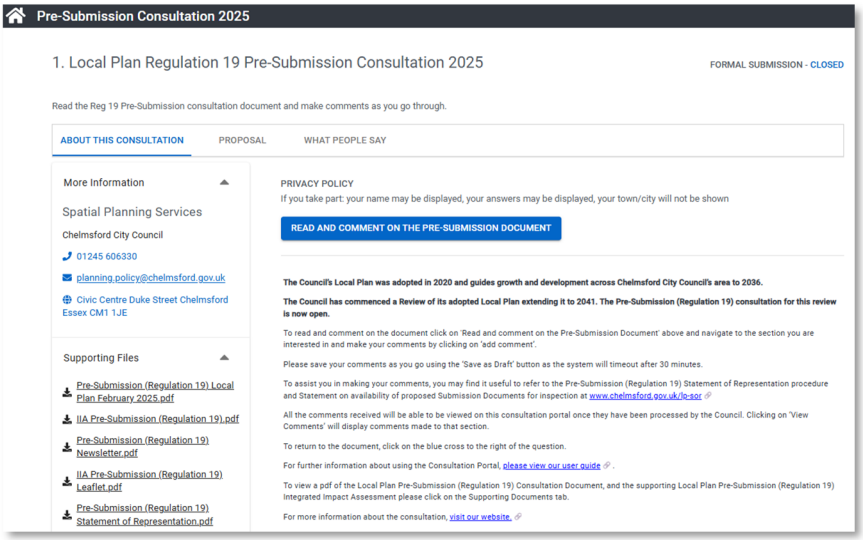
Closed consultations >

External consultations >

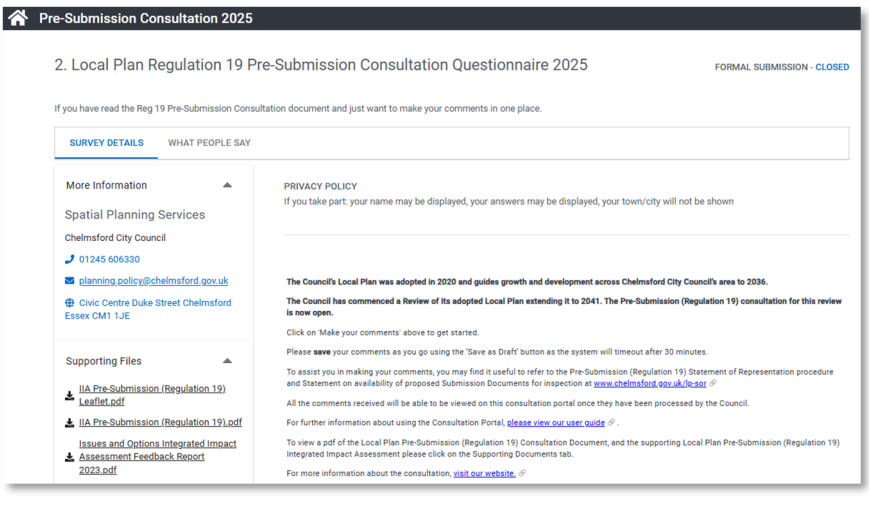
Is there something wrong with this page? >


Consultation Home
Login/Register
Welcome to our Consultation Portal for Planning Policy
Latest News
Review of the Adopted Local Plan – Regulation 19 Pre-Submission Consultation 2025 – NOW CLOSED
The Council's Local Plan was adopted in 2020 and guides growth and development across Chelmsford City Council's area to 2036. The Council has commenced a Review of its adopted Local Plan, extending it to 2041.


Chelmsford Local Plan
Pre-Submission (Regulation 19) Document
Our Planning Strategy 2022 to 2041
Chelmsford
LIVE DOCUMENT
1. Local Plan Regulation 19 Pre-Submission Consultation 2025
296
Read the Reg 19 Pre-Submission consultation document and make comments as you go through.
closed
04/02/2025 10:00AM
18/03/2025 04:00PM
LEARN MORE
READ AND COMMENT ON THE PRE-SUBMISSION DOCUMENT


Pre-Submission Consultation 2025
1. Local Plan Regulation 19 Pre-Submission Consultation 2025
FORMAL SUBMISSION - CLOSED
Read the Reg 19 Pre-Submission consultation document and make comments as you go through.
ABOUT THIS CONSULTATION
PROPOSAL
WHAT PEOPLE SAY
More Information
Spatial Planning Services
Chelmsford City Council
01245 606330
planning.policy@chelmsford.gov.uk
Civic Centre Duke Street Chelmsford Essex CM1 1JE
Supporting Files
Pre-Submission (Regulation 19) Local Plan February 2025.pdf
IIA Pre-Submission (Regulation 19).pdf
Pre-Submission (Regulation 19) Newsletter.pdf
IIA Pre-Submission (Regulation 19) Leaflet.pdf
Pre-Submission (Regulation 19) Statement of Representation.pdf
PRIVACY POLICY
If you take part: your name may be displayed, your answers may be displayed, your town/city will not be shown
READ AND COMMENT ON THE PRE-SUBMISSION DOCUMENT
The Council's Local Plan was adopted in 2020 and guides growth and development across Chelmsford City Council's area to 2036.
The Council has commenced a Review of its adopted Local Plan extending it to 2041. The Pre-Submission (Regulation 19) consultation for this review is now open.
To read and comment on the document click on 'Read and comment on the Pre-Submission Document' above and navigate to the section you are interested in and make your comments by clicking on 'add comment'.
Please save your comments as you go using the 'Save as Draft' button as the system will timeout after 30 minutes.
To assist you in making your comments, you may find it useful to refer to the Pre-Submission (Regulation 19) Statement of Representation procedure and Statement on availability of proposed Submission Documents for inspection at www.chelmsford.gov.uk/lp-sor
All the comments received will be able to be viewed on this consultation portal once they have been processed by the Council. Clicking on 'View Comments' will display comments made to that section.
To return to the document, click on the blue cross to the right of the question.
For further information about using the Consultation Portal, please view our user guide .
To view a pdf of the Local Plan Pre-Submission (Regulation 19) Consultation Document, and the supporting Local Plan Pre-Submission (Regulation 19) Integrated Impact Assessment please click on the Supporting Documents tab.
For more information about the consultation, visit our website.


Vision
Spatial Strategy
Strategic Priorities
What elements does the review cover?
Policies
Spatial Principles
Draft Policies Map
SURVEY
2. Local Plan Regulation 19 Pre-Submission Consultation Questionnaire 2025
6411
If you have read the Reg 19 Pre-Submission Consultation document and just want to make your comments in one place.
closed
04/02/2025 10:00AM
18/03/2025 04:00PM
LEARN MORE


Pre-Submission Consultation 2025
2. Local Plan Regulation 19 Pre-Submission Consultation Questionnaire 2025
FORMAL SUBMISSION - CLOSED
If you have read the Reg 19 Pre-Submission Consultation document and just want to make your comments in one place.
SURVEY DETAILS
WHAT PEOPLE SAY
More Information
Spatial Planning Services
Chelmsford City Council
01245 606330
planning.policy@chelmsford.gov.uk
Civic Centre Duke Street Chelmsford Essex CM1 1JE
Supporting Files
IIA Pre-Submission (Regulation 19) Leaflet.pdf
IIA Pre-Submission (Regulation 19).pdf
Issues and Options Integrated Impact Assessment Feedback Report 2023.pdf
PRIVACY POLICY
If you take part: your name may be displayed, your answers may be displayed, your town/city will not be shown
The Council's Local Plan was adopted in 2020 and guides growth and development across Chelmsford City Council's area to 2036.
The Council has commenced a Review of its adopted Local Plan extending it to 2041. The Pre-Submission (Regulation 19) consultation for this review is now open.
Click on 'Make your comments' above to get started.
Please save your comments as you go using the 'Save as Draft' button as the system will timeout after 30 minutes.
To assist you in making your comments, you may find it useful to refer to the Pre-Submission (Regulation 19) Statement of Representation procedure and Statement on availability of proposed Submission Documents for inspection at www.chelmsford.gov.uk/lp-sor
All the comments received will be able to be viewed on this consultation portal once they have been processed by the Council.
For further information about using the Consultation Portal, please view our user guide .
To view a pdf of the Local Plan Pre-Submission (Regulation 19) Consultation Document, and the supporting Local Plan Pre-Submission (Regulation 19) Integrated Impact Assessment please click on the Supporting Documents tab.
For more information about the consultation, visit our website.

CONSULTATION PORTAL GUIDANCE NOTES

Online Consultation Portal:

Go to: www.chelmsford.gov.uk/planningpolicyconsult where you can:

- Read the consultation documents
- Make your comments
- Sign up for alerts to feedback reports and future consultations

This is our preferred means of receiving comments as it ensures that your comments are recorded accurately and are processed quickly.

You can view, download, and comment on all current consultations on the online Consultation Portal. It also allows you to edit comments before submitting them, save a draft and return to your form later, and to upload any supporting material.

Before making your comments, you may find it useful to refer to the **Pre-Submission (Regulation 19) Statement of Representation Procedure and Statement on Availability of Proposed Submission Documents for Inspection** www.chelmsford.gov.uk/lp-sor

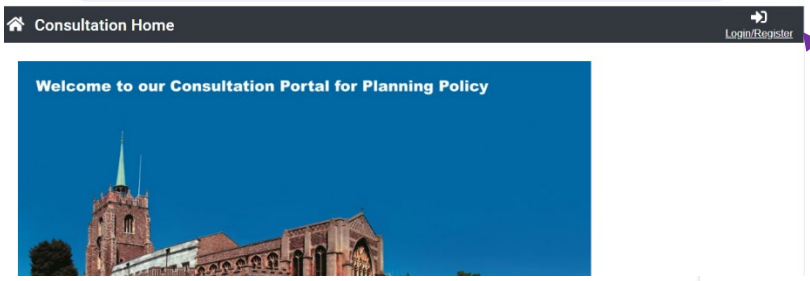
If you require assistance please call 01245 606330 during normal office hours (08.45am to 4.45pm Monday to Thursday; 08.45am to 4.00pm Friday) or email planning.policy@chelmsford.gov.uk

For further information about the Local Plan please visit www.chelmsford.gov.uk/lp-review

The consultation period runs from 10am on 4 February 2025 until 4pm on 18 March 2025.
Comments received before or after this time cannot be accepted.

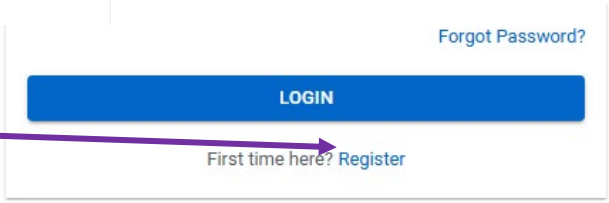
How to register

If you have not already registered, registration is simple using the easy to follow steps. Find the Consultation Portal at:
www.chelmsford.gov.uk/planningpolicyconsult



- go to the Consultation Portal
- click on Login/Register button

- click on Register



A registration screen will open.
You then need to read the terms and conditions, and the privacy policy, and tick the boxes.
Then you can:

- create a username
- choose a password (this should be as secure as possible, and include a mix of numbers and letters)

You should only register as an agent if you are representing someone else in a professional capacity, such as a developer or a client.

When you have added your information, click REGISTER. We will send you an email with a link, inviting you to activate your account. After clicking the link, click on your name (top right of screen) and My Details to complete your information.

It is important that you fill in your postal address, so that we have an alternative means of contacting you.

Forgotten login details?

If you have already signed up but forgotten your login details, you should not register again, as this will create a duplicate record.

- go to the Consultation Portal
- click on Sign in button
- click the 'Forgot Password?' link to reset your password

If you are still experiencing problems, you can contact the Planning Policy Helpline on 01245 606330.

How to read the consultation documents and make a comment

Open the Consultation Portal at: www.chelmsford.gov.uk/planningpolicyconsult

Choose the consultation that you are interested in.

We are consulting on the following.

1. Chelmsford Local Plan – Pre-Submission (Regulation 19) Document – this is the main consultation document where we include sites where new homes, jobs and other facilities will be located as well as areas for protection. We need you to consider whether the Pre-Submission Document is legally compliant and consistent with national policy, and answer specific consultation questions on this.

2. Chelmsford Local Plan – Pre-Submission (Regulation 19) Questionnaire – this is a simple questionnaire you can use if you have read the consultation document and just want to make your comments in one place. We need you to consider whether the Pre-Submission Document is legally compliant and consistent with national policy, and answer specific consultation questions on this.

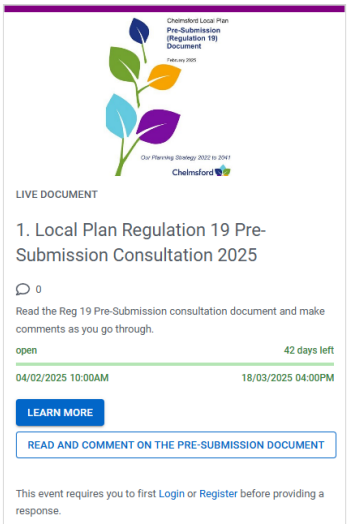
3. Pre-Submission Integrated Impact Assessment (IIA) – this includes environmental, habitats, quality and health assessments of the impacts of the Pre-Submission Local Plan.

4. Co-Living Housing Planning Advice Note Consultation – this provides practical guidance to potential promoters or developers of co-living housing in Chelmsford.

5. Consultation Draft Planning Obligations Supplementary Planning Document (SPD) – this sets out how we will seek planning obligations such as financial contributions towards important site improvements when considering planning applications.

1. Pre-Submission (Regulation 19) Document - How to make a comment

Go to the consultation



Select ‘Learn More’

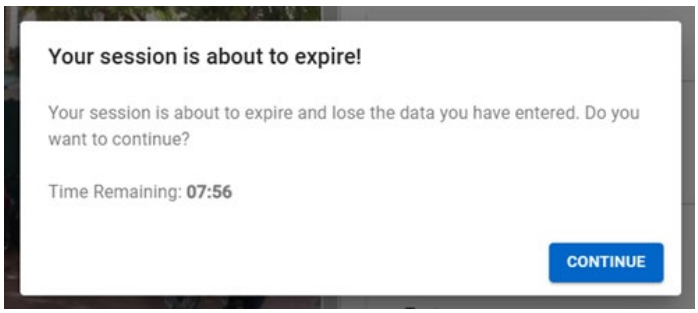
You can read the whole document from the beginning, and move through by scrolling with your mouse or scroll bar. Otherwise, you can use the contents page to navigate the document and select which part of the document you wish to view.

Once you have chosen which part of the plan you wish to comment on, select ‘ADD COMMENT’. This will open a comment form where you can use the specifically designed questions to respond. You will need to log in to make a comment.

Please note you will need to add your comments through a new comment form for each paragraph, policy, map, table, figure or appendix you wish to comment on.

Please **save** your comments as you complete the form using the ‘Save Draft’ button at the bottom of the form as the system will timeout after 30 minutes.

You will get a reminder 10 minutes before the system times out. You will need to select ‘Continue’, and then make sure that you ‘Save Draft’.

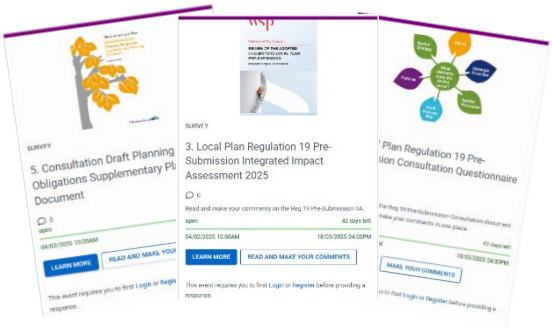


When you have completed the comments form, do not forget to select ‘Submit’.

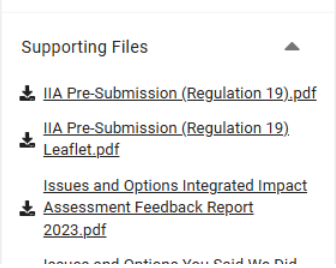
How to make a comment – other consultations

2. Chelmsford Local Plan – Pre-Submission (Regulation 19) Questionnaire
3. Pre-Submission Integrated Impact Assessment (IIA)
4. Co-Living Housing Planning Advice Note Consultation
5. Consultation Draft Planning Obligations Supplementary Planning Document (SPD) –

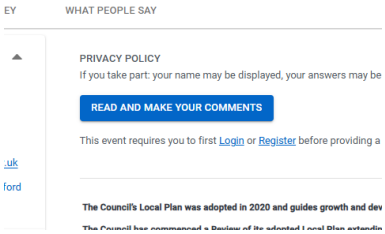
Go to the consultation you are interested in and select the ‘Learn More’ button:



The consultation document and the supporting documents are listed on the left side.
Please read the documents before making your comments.

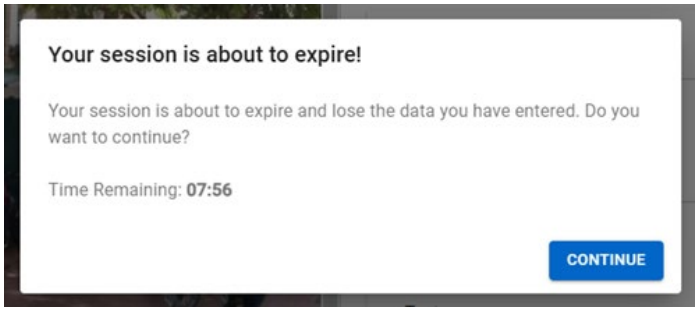


When you are ready to make your comments, click on the ‘Read and make your comments’ button.



Please **save** your comments as you complete the form using the ‘Save Draft’ button at the bottom of the form as the system will timeout after 30 minutes.

You will get a reminder 10 minutes before the system times out. You will need to select ‘Continue’, and then make sure that you ‘Save Draft’.



When you have completed the comments form, do not forget to select ‘Submit’.

Important notes:

If you are submitting a representation of significant length, please provide a summary of not more than 200 words. We will request a summary in appropriate circumstances if it is not originally provided.

When uploading supporting documents, please ensure they contain no signatures, e-mail addresses or personal postal addresses.

To be duly made, you need to provide your name and address with your comment. Anonymous comments will not be accepted.

Comments will be published with the respondent's name, organisation and agent (where applicable). No other personal details will be made public. This includes publication on the Council's Consultation Portal. Data will be held in accordance with the Data Protection Act 1998 and the General Data Protection Regulations. For more information please visit the Council's Privacy Policy web page: www.chelmsford.gov.uk/your-council/about-ourwebsite/privacy-policy-and-notices/privacy-policy/

Section 149 of the Equality Act 2010 requires the Council to avoid any form of discrimination and also foster good relations between different ethnic groups. We will not display, share or consider any comments that are inappropriate, including those that are racist, inflammatory or derogatory. Comments which contain personal or sensitive information e.g. health information, details about a criminal record, or religious beliefs, will not be accepted.

Petitions:

If you are organising a petition or intend to, or have signed one, it must be submitted by 4.00pm on 18 March 2025 and be accompanied by the name and contact details for the petition organiser. The Council will register the petition organiser on the Consultation Portal and the number of signatories will be assigned to that comment/s, but names and addresses of all signatories will not be published. Acknowledgement of the petition and any future Local Plan notifications will only be sent to the petition organiser.

Helpline:

If you require assistance please call 01245 606330 during normal office hours (08.45am to 4.45pm Monday to Thursday; 08.45am to 4.00pm Friday) or email planning.policy@chelmsford.gov.uk

Consultation on Chelmsford Local Plan - Pre-Submission (Regulation 19) Document

PAPER COMMENTS FORM

This form has three Parts:

- Part A - Consultation Details
- Part B - Contact Details
- Part C - Your Comments on the Chelmsford Local Plan - Pre-Submission (Regulation 19) Document

Part A - Consultation Details

Chelmsford City Council has published the Chelmsford Local Plan - Pre-Submission (Regulation 19) Document and accompanying Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment for consultation in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.

How to comment

This form is for your comments on the Chelmsford Local Plan - Pre-Submission (Regulation 19) Document. There is a separate form for the Pre-Submission Integrated Impact Assessment.

The Council strongly encourages comments to be made via its online Consultation Portal www.chelmsford.gov.uk/planningpolicyconsult as this enables the quick and efficient handling of comments. This system allows you to edit comments before submitting them and to upload any supporting material.

For further information about how the Consultation Portal works, read our User Guide at: www.chelmsford.gov.uk/lp-portal-guide Alternatively, comments can be made using this representation form and returned to:

- By email - planning.policy@chelmsford.gov.uk
- By post - Planning and Housing Policy, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE
- By hand - Chelmsford City Council Customer Service Centre, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, Monday to Friday 10am-4pm.

How comments will be used

To be duly made, you need to provide your name and address with your comment. Anonymous comments will not be accepted. At this stage of Local Plan preparation, comments should focus on legal compliance and the soundness of the Local Plan. This is the information required by the Planning Inspectorate who will independently examine the Local Plan and consider any unresolved objections.

Comments will be published with the respondent's name, organisation and agent (where applicable). No other personal details will be made public. Data will be held in accordance with the Data Protection Act 1998 and the General Data Protection Regulations. For more information please visit the Council's Privacy Policy web page: www.chelmsford.gov.uk/your-council/about-our-website/privacy-policy-and-notices/privacy-policy/

A copy of all duly made representations to the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document and Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector). These representations will be 'made available' in line with the Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20, 22 and 35). This includes publication on the Council's Consultation Portal.

Section 149 of the Equality Act 2010 requires the Council to avoid any form of discrimination and also foster good relations between different ethnic groups. We will not display, share or consider any comments that are inappropriate, including those that are racist, inflammatory or derogatory. Comments which contain personal or sensitive information e.g. health information, details about a criminal record, or religious beliefs, will not be accepted and/or will be redacted.

Part B - Contact Details

Personal Details

Title: .....

First Name: .....

Last Name: .....

Organisation (if the comments you are making are on behalf of an organisation):

.....

Address: .....

.....

.....

.....

Postcode: .....

Telephone Number: .....

Email Address:

.....

Consultation ID (if known): .....

Signature: .....

Date: .....

Agent Details (if applicable)

Title: .....

First Name: .....

Last Name: .....

Organisation (if the comments you are making are on behalf of an organisation):

.....

Address: .....

.....

.....

.....

Postcode: .....

Telephone Number: .....

Email Address:

.....

Consultation ID (if known): .....

Signature: .....

Date: .....

Comments must be received by 4.00pm on 18 March 2025

Part C - Your Comments on the Chelmsford Local Plan - Pre-Submission (Regulation 19) Document

ESSENTIAL INFORMATION

Which part of the Chelmsford Local Plan - Pre-Submission (Regulation 19) Document does the representation relate to:

Paragraph Number:	
Policy Number:	
Policies Map Number or Name:	
Table Number:	
Figure Number:	
Appendix:	

Important Note:
If you wish to submit a representation on more than one part of the Local Plan, please complete a continuation sheet as provided for each one e.g. on more than one proposed site allocation, or policy.

To assist you in completing this form you may find it useful to refer to the Pre-Submission (Regulation 19) Statement of Representation Procedure and Statement on Availability of Proposed Submission Documents for Inspection (www.chelmsford.gov.uk/lp-sor).

Question 1:
Do you consider the Local Plan legally compliant in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012?
For the definition of 'legally compliant', please refer to the **Statement of Representation.**

Yes ☐ No ☐

Please provide an explanation below. Please provide precisely and succinctly all the evidence and supporting information necessary to support your representation:

If you need more room, please continue on a separate sheet and attach it to this form.

Comments must be received by 4.00pm on 18 March 2025

Question 1a:
Please set out below the modifications you consider necessary to make the Local Plan legally compliant including revised wording of any policy or text. Please provide precisely and succinctly all the evidence and supporting information necessary to support your representation:

If you need more room, please continue on a separate sheet and attach it to this form.

Question 2:
Does the Local Plan comply with the Duty to Co-operate?

For information on the term 'Duty to Co-operate', please refer to the **Statement of Representation.**

Yes ☐ No ☐

Please provide an explanation below:

If you need more room, please continue on a separate sheet and attach it to this form.

Question 2a:
Please set out below any changes to the approach taken which you consider necessary to ensure the Duty to Co-operate is met. Please include revised wording of any policy or text to the Local Plan. Please be as precise and succinct as possible:

If you need more room, please continue on a separate sheet and attach it to this form.

Comments must be received by 4.00pm on 18 March 2025

Question 3:
Do you consider the Local Plan to be 'sound'? To be found 'Sound' a Local Plan should be positively prepared, justified, effective and consistent with National Policy.
For more information on the term 'Soundness', please refer to the **Statement of Representation.**

Yes ☐ No ☐

If No, because you consider the Local Plan is NOT:

☐ Positively prepared
☐ Justified
☐ Effective
☐ Consistent with national policy

Question 3a:
Please provide an explanation below and identify the main issues:

If you need more room, please continue on a separate sheet and attach it to this form.

Question 3b:
Please set out below the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text. Please be as precise and succinct as possible:

If you need more room, please continue on a separate sheet and attach it to this form.

Comments must be received by 4.00pm on 18 March 2025

Question 4:
If your representation is seeking a change, do you consider it necessary to take part and speak at the Independent Examination hearing?
It is the Planning Inspector's decision who will participate and be heard at the Independent Examination.
In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the examination process.

Yes ☐ No ☐

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

Question 4a:
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you need more room, please continue on a separate sheet and attach it to this form.

Question 5: Executive Summary
If you are submitting a representation of significant length, please provide a summary of the main issues in your representation in no more than 200 words. We will request a summary in appropriate circumstances if it is not originally provided.

Please provide an executive summary of the main issues below:

If you need more room, please continue on a separate sheet and attach it to this form.

Comments must be received by 4.00pm on 18 March 2025

Question 6:
Do you wish to be notified of the following:
Please note if you **do not** select any boxes, you will not be notified at the following stages of Local Plan preparation.

- ☐ Submission of the Local Plan for Examination
- ☐ Publication of the Inspector's Report
- ☐ Adoption of the Local Plan

If you wish to submit any supporting information, please ensure it contains no signatures, e-mail addresses or personal postal addresses.

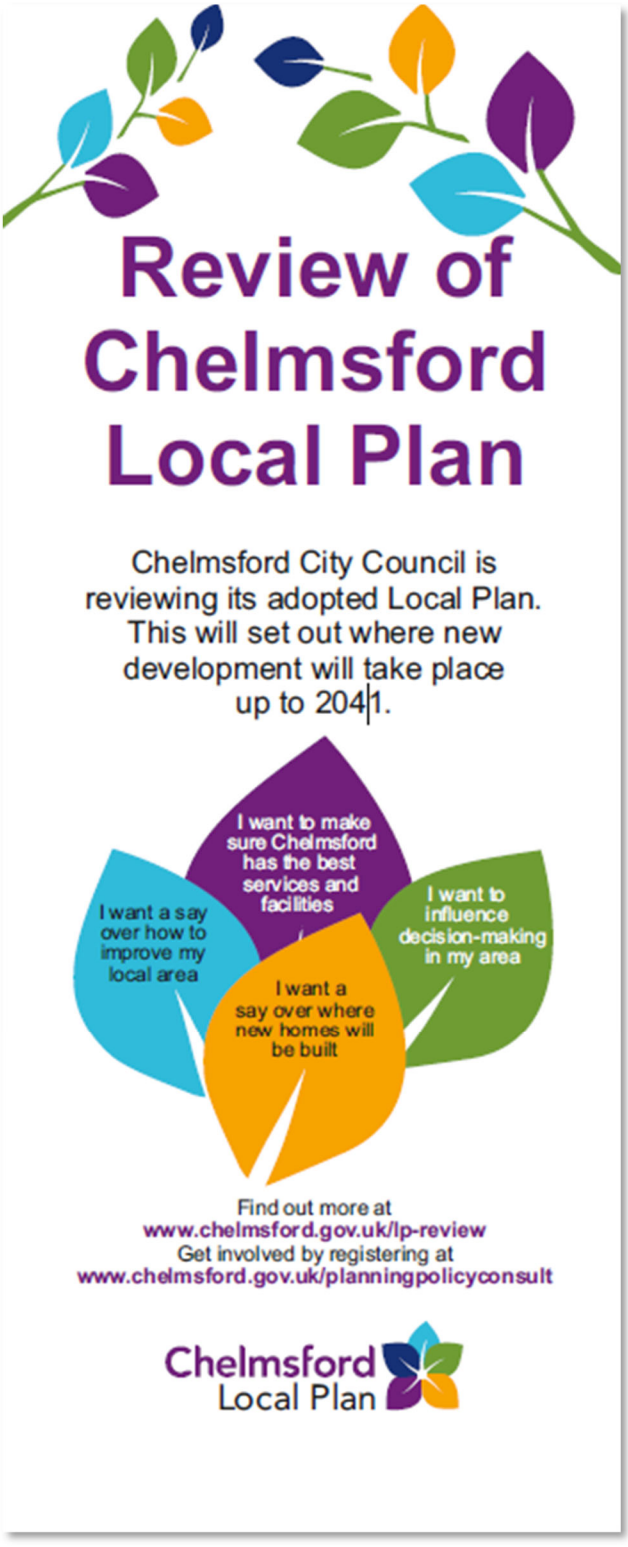
This paper comments form can be made available in alternative formats including large print, audio and other languages.

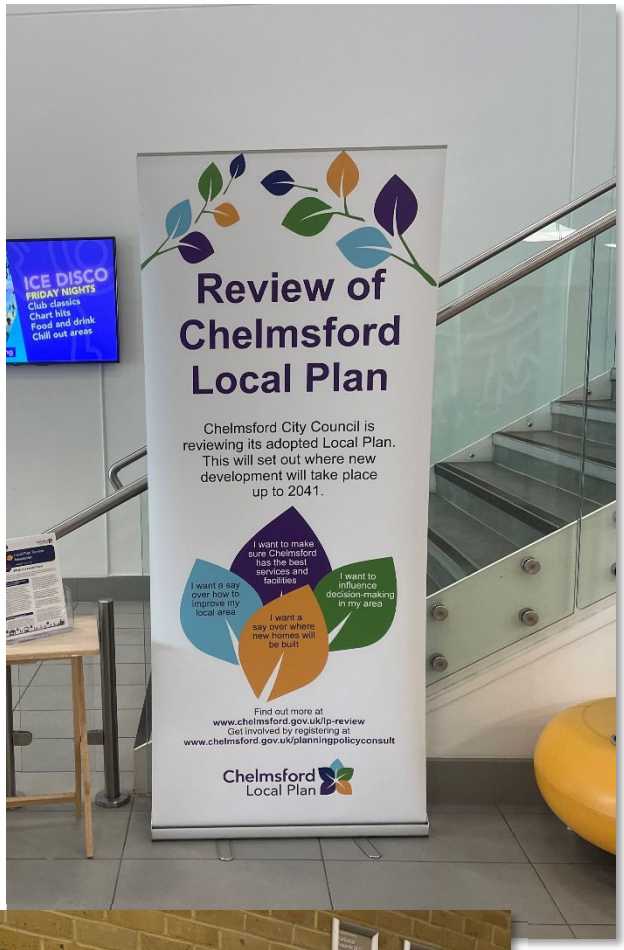
If you require assistance please call 01245 606330 during normal office hours (08.45am to 4.45pm Monday to Thursday; 08.45am to 4.00pm Friday) or email planning.policy@chelmsford.gov.uk

Thank you for being part of the consultation.

Pop-Up stands were located at four venues:

Chelmsford Museum
South Woodham Ferrers Leisure Centre
Riverside Ice & Leisure
Chelmsford Sport and Athletics Centre







Welcome

Thank you for visiting today

What is the Local Plan

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

Why are we reviewing the adopted Chelmsford Local Plan?

We adopted our current Local Plan in May 2020, and good progress is being made with implementing it.

We need to review the plan at least every five years to make sure it remains up to date and meets the changing needs for development growth to 2041.

This consultation is called the Pre-Submission (Regulation 19) Local Plan. It is the third and final stage of consultation towards updating the adopted Local Plan and has been prepared following public consultation in 2022 and 2024. It is your opportunity to feed into the review process and help to shape the plan and the future of your area.

Government requirements mean that we must provide more homes but our aim is to get the right type of development in the right places to meet the growing needs of local people and businesses, while protecting our environment.

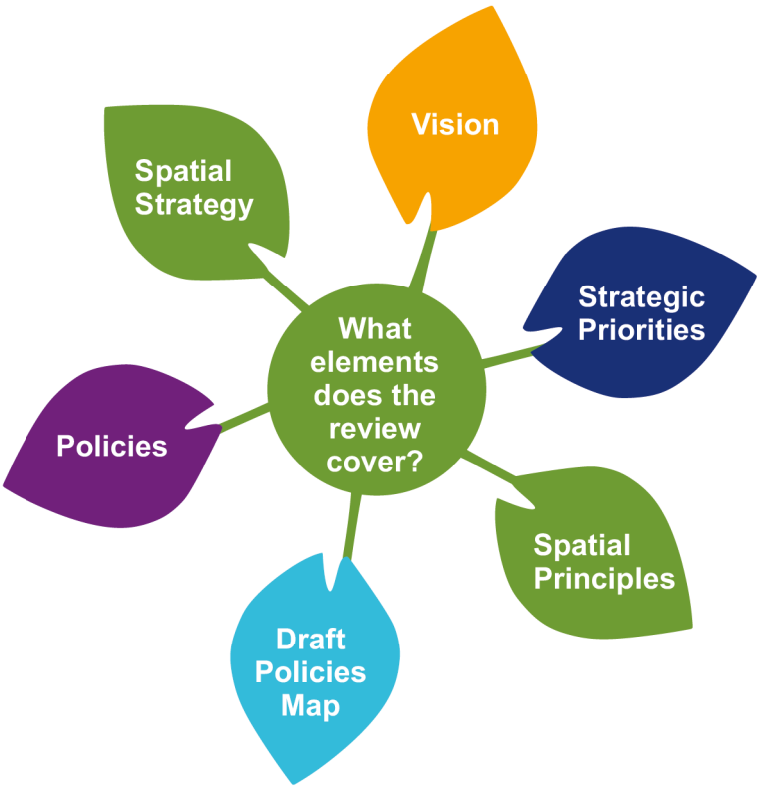
If the Local Plan becomes out of date, the Council could have very little influence over the location of new development and supporting infrastructure. Sites could be promoted for development in locations that the Council and its communities want to protect, and which are not considered sustainable.

What is included in the consultation?

We want to make sure we cover the right issues and that all the suitable options for accommodating change are considered. The Pre-Submission document is a full draft local plan, and includes the following key changes to the adopted Local Plan:

- Updated Strategic Priorities
- New Vision
- The amount of future development needed, including for homes and jobs
- Spatial Strategy, including new site allocations, for accommodating this future development to 2041 and beyond
- Reviewed planning policies.

Many parts of the adopted Local Plan and its policies are still up to date and generally performing well, so they require partial changes. Some changes and new policies are needed to reflect national planning policy requirements, the Council's ambitions and aspirations, and new development growth to 2041 and beyond.



Chelmsford Local Plan

Pre-Submission Local Plan – Background and Challenges

Chelmsford is already an attractive place, comprising the City of Chelmsford, the town of South Woodham Ferrers, numerous villages within attractive countryside and a rich and diverse natural and historic environment. The growth that has taken place, over past 25 years, has helped shape Chelmsford into the successful place it is now.

Vital new infrastructure has been delivered alongside new homes, jobs, shops and leisure opportunities. Chelmsford's economy shows strengths across many sectors, but especially finance, health and education.

Taking into account the projected population increase, we are determined to ensure that future growth continues to take place in a sustainable way. This will bring further improvements to the quality of life for residents and much needed new community and transport infrastructure whilst at the same time protecting and enhancing the natural and historic environment.

The Local Plan is forward looking, shaping the sustainable planning of Chelmsford's development and infrastructure needs not just in the foreseeable future but also providing a longer-term framework.

Previous consultation

We consulted on the first stage of reviewing the Local Plan, called the Issues and Options, from August to October 2022. A total of 1,178 responses were received from 711 people or organsiations, along with a petition. For the Preferred Options consultation from May to June 2024 a total of 10,418 responses were received from 3,678 people or organisations.

We have published feedback documents setting out a review of the consultation activity, a summary of the representations we received, and how these comments have been used to develop the Pre-Submission Local Plan document that we are consulting on now.

You can read the 'You said, We Did' feedback reports on our website at **www.chelmsford.gov.uk/lp-review.**

All the comments received can also be viewed on the Council's planning policy consultation portal at **www.chelmsford.gov.uk/planningpolicyconsult.**

Challenges

Population – is predicted to increase by 11.5% to 202,300 by 2041. Demographic changes will shape the type and size of accommodation necessary over the Local Plan period.

Economy – 12.5% growth in jobs is anticipated by 2041. Due to its location and high education standards, Chelmsford is expected to accommodate a major share of the forecast new employment growth. Significant additional land for employment is proposed through the Local Plan.

Transport – Chelmsford occupies a key place on the regional road and rail network. New development can generate additional service provision and transport investment, through direct provision of facilities and/or financial contributions from developers.

Environment – Chelmsford enjoys a high quality environment including recreational space, parks, gardens, nature reserves and the designated Green Wedge – and over 1,000 Listed Buildings. Development proposals need to balance the needs of development with the preservation and enhancement of natural and historic assets.

Housing – The Council has declared a housing crisis, with many individuals and families in temporary or unsuitable accommodation, an often expensive private rented sector, and an overall limited supply of affordable housing. The Local Plan can help to address this through housing allocations, setting an appropriate mix of homes, and working with housing partners.

Climate change – A climate and ecological emergency was declared in 2019 to tackle the consequences of climate change and reduce our impact on the planet. Closer to home, the Local Plan can set requirements for zero carbon development, boost active and sustainable travel, require expansion of natural habitats, and improve water efficiency and flood risk management.

Communities – health inequalities and wellbeing opportunities can be tackled through the Local Plan by providing the conditions for stronger and more-connected communities.

What has been considered

The Spatial Strategy, setting out where new development should be located, takes the following as a starting point:

Strategic Priorities + Vision + Spatial Principles + Settlement Hierarchy

Our Strategic Priorities

Our Strategic Priorities are the key priorities which set the overall policy direction for the Local Plan.

Priorities for climate	Priorities for growth	Priorities for place
1. Addressing the Climate and Ecological Emergency	4. Ensuring sustainable patterns of development and protecting the Green Belt	7. Creating well designed and attractive places, and promoting the health and social wellbeing of communities
2. Promoting smart, active travel and sustainable transport	5. Meeting the needs for new homes	8. Delivering new and improved strategic and local infrastructure
3. Protecting and enhancing the natural and historic environment, and support an increase in biodiversity and ecological networks	6. Fostering growth and investment and providing new jobs	9. Encouraging resilience in retail, leisure, commercial and cultural development

The updated Vision

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

The Local Plan Vision is a high-level guiding statement that sets out what is important for a place and how change will be managed in the future. It is a core part of a Local Plan and all the policies in the Plan will together deliver the Vision. We have reviewed the Local Plan Vision to reflect the new local priorities within the Council's Corporate Plan - Our Chelmsford, Our Plan. We have also considered other national and local priorities and Chelmsford's challenges and opportunities. It has also been simplified, shortened and purposefully aligned to the Corporate Plan, to make it easier to use.

Spatial Principles

The Spatial Principles will ensure that the Pre-Submission Local Plan focuses growth in the most sustainable locations.

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

Settlement Hierarchy

Another factor for developing the Pre-Submission Spatial Strategy and choosing areas for growth is the Settlement Hierarchy, which ranks towns and villages according to their size, function, characteristics and sustainability.

How much growth are we planning for?

Sites allocated in the adopted Local Plan are now coming forward through Masterplans and planning applications.

The next housing target to 2041 is set by a Government formula, called the standard method. The advanced stage of the Pre-Submission Local Plan means we only need to meet 80% of this target.

Housing requirement for Plan period	22,990 homes
Completions 2022-23	1,837
Adopted Local Plan allocations	11,867
Sites with planning permission	3,016
Windfall allowance (2026-2041)	2,373
New allocations needed	**4,233**

The Local Plan also plans to meet future employment needs by providing additional employment allocations.

Employment requirement for Plan period	162,646 sqm
Adopted Local Plan allocations	55,000 sqm

New housing development, in particular, will be required to provide supporting infrastructure, services and facilities including for:

- Transport improvements including the New Beaulieu Park Rail Station, Chelmsford North East Bypass, Army and Navy junction improvements, and sustainable travel routes
- Community buildings, schools, healthcare, wellbeing measures, sports and cultural facilities
- Green infrastructure including new Country Parks, open space, green/blue networks, biodiversity and public realm improvements
- Preservation and enhancement of historic assets
- Flood risk management and utility infrastructure

New development allocations will be focused on three growth areas of Central and Urban Chelmsford, North Chelmsford and South and East Chelmsford. This distribution of growth is shown on the Key Diagram.



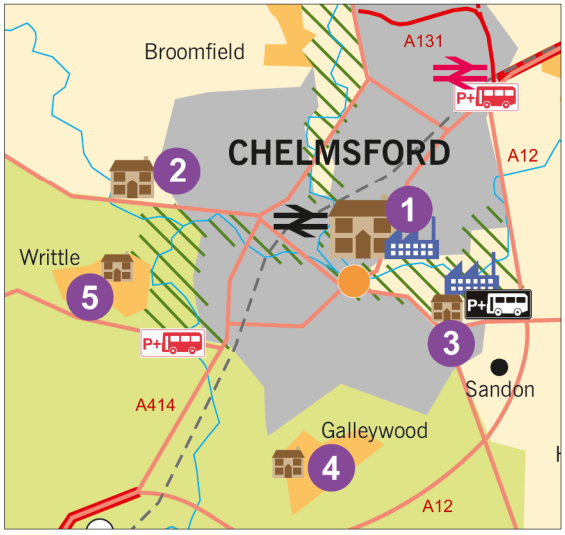
Discounted locations for development

Areas have been discounted as follows:

- The Green Belt, a national designation to prevent encroachment of urban growth into undeveloped areas. This covers almost 34% of the land in the south and west of Chelmsford, shaded in green on the Key Diagram
- The Green Wedge, a key local landscape designation of a green network which prevents urban sprawl and provides for wildlife and nature conservation, flood storage and active travel routes. This covers the river valleys where they pass into Chelmsford's urban area, shaded in hatched green on the Key Diagram
- Areas with known severe constraints/capacities including highways and education
- Areas where no land was being promoted through the Call for Sites exercise

Growth Area 1 – Central and Urban Chelmsford

Development in this area will deliver a number of benefits including green infrastructure and city greening, enhanced bus services, and opportunities to maximise walking and cycling into the City Centre. Previously developed land in the City Centre will be used to strengthen and expand the City as a major residential and employment centre.



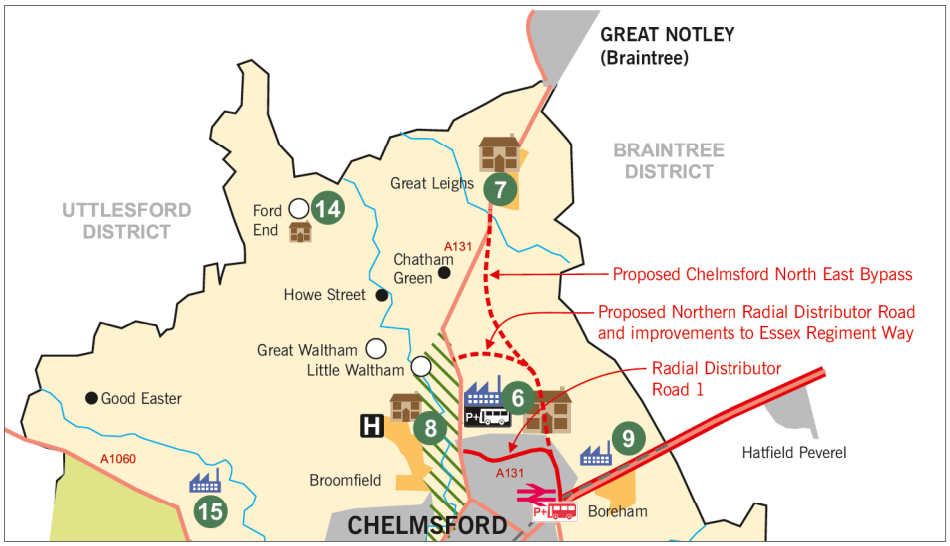
STRATEGIC EMPLOYMENT LOCATION
HOUSING: CENTRAL & URBAN CHELMSFORD
GREEN BELT
GREEN WEDGE
RURAL AREA
CITY/TOWN
KEY SERVICE SETTLEMENT
SMALL SETTLEMENT
BEAULIEU PARK RAIL STATION
RAIL STATION
RAILWAY LINE
AREA CONSIDERED FOR ADDITIONAL PARK AND RIDE FACILITIES
PARK AND RIDE
MAJOR ROADS
A12 IMPROVEMENTS
ARMY AND NAVY JUNCTION IMPROVEMENTS
RIVER

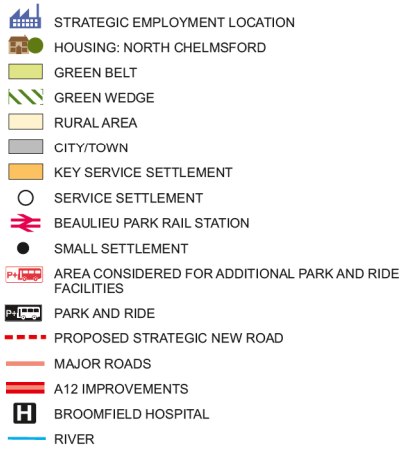
Growth Area 1 – Central and Urban Chelmsford			
Development Allocations		Total Homes	Employment Floorspace
1	Previously developed sites in Chelmsford Urban Area	3,013	4,000sqm Use Class E(g)(i-ii)
2	West Chelmsford	880 plus 5 Travelling Showpeople Plots	
3a	East of Chelmsford - Manor Farm	360	
3b	East of Chelmsford - Land North of Maldon Road		5,000sqm Office/Business Park
3c	East of Chelmsford - Land South of Maldon Road	109	
3d	East of Chelmsford - Land North of Maldon Road	65	
4	Land North of Galleywood Reservoir	24	
5	Land surrounding Telephone Exchange, Ongar Road, Writtle	25	
Area Total		**4,476**	**9,000sqm**

New supporting infrastructure in Growth Area 1
Primary school
Four early years and childcare nurseries
Two new special schools
Country park
Access to Sandford Mill and a visitor centre
Financial contributions to provision of education, community facilities, healthcare, sports and recreation facilities, sustainable transport, local mobility hub and road network enhancements

Growth Area 2 – North Chelmsford

Development in this area will deliver a substantial number of new homes and employment over the Local Plan period, underpinned by a comprehensive package of new infrastructure including new schools, early years and childcare provision, green infrastructure and neighbourhood centres. Significant growth is proposed to Chelmsford Garden Community, along with extensions to two employment sites, and small village allocations.



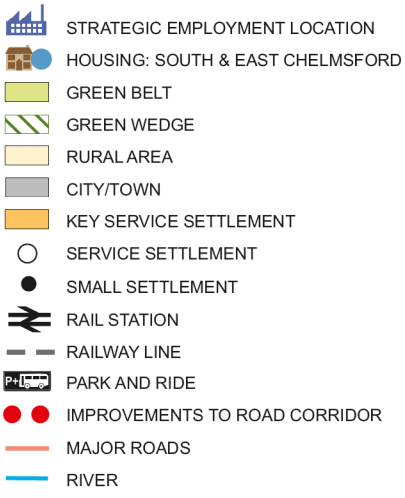


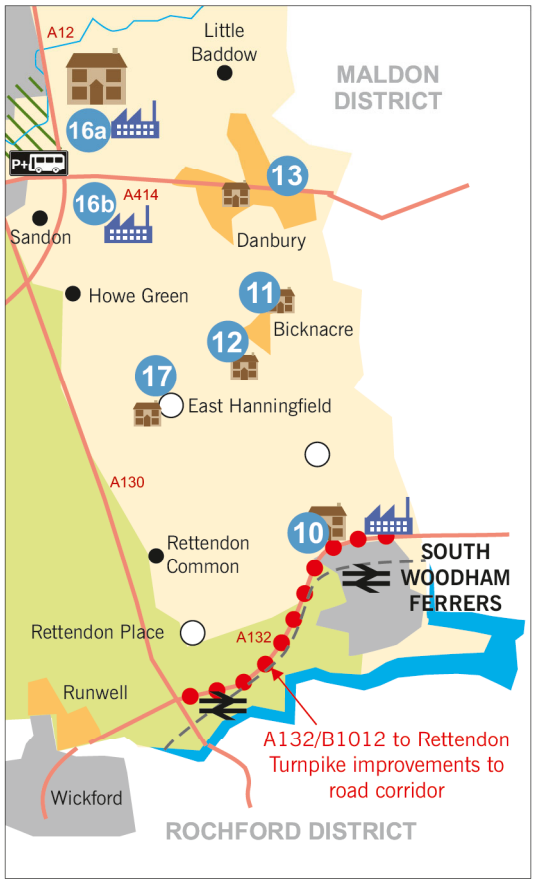
Growth Area 2 – North Chelmsford			
Development Allocations		Total Homes	New Employment Floorspace
6	North East Chelmsford (Chelmsford Garden Community)	5,569 (plus 681 homes post 2041), plus10 Traveller Pitches	56,946sqm Office/Business Park
7a	Great Leighs - Land at Moulsham Hall	750, plus 5 Travelling Showpeople Plots	
7b	Great Leighs - Land East of London Road	250	
7c	Great Leighs - Land North and South of Banters Lane	100	
8	North of Broomfield	512	
9a	Waltham Road Employment Area		3,500sqm B2/B8
14b	Land south of Ford End Primary School, Ford End	20	
15	Little Boyton Hall Farm Rural Employment Area		6,000sqm B2/B8
Area Total		**7,201**	**66,446sqm**

New supporting infrastructure in Growth Area 2
Transport including Phase 1 of Chelmsford North East Bypass, Northern Radial Distributor Road, bus infrastructure
Six village/neighbourhood centres
Secondary school
Five primary schools
Ten early years and childcare nurseries
Country park
Financial contributions to Beaulieu Park Railway Station, provision of education and community facilities, healthcare, sports and recreation facilities, sustainable transport and road network enhancements

Growth Area 3 – South and East Chelmsford

Proposals include a high quality and comprehensively planned new Garden Community to the East of Chelmsford at Hammonds Farm, with a wide range of supporting uses. Also proposed is a strategic employment site, along with four smaller village allocations to contribute towards supporting existing village facilities and services.





Growth Area 3 – South and East Chelmsford		
Development Allocations	Total Homes	New Employment Floorspace
16a East Chelmsford Garden Community (Hammonds Farm)	3,000 (plus 1,500 homes post 2041), plus 20 Traveller Pitches and 13 Travelling Showpeople Plots	43,000sqm Business Space
16b Land adjacent to A12 Junction 18		43,000sqm Business Space
10 North of South Woodham Ferrers	1,220, plus 5 Travelling Showpeople Plots	1,200sqm Business Space
11b Land at Kingsgate, Bicknacre	20	
11c Land west of Barbrook Way, Bicknacre	20	
12 St Giles, Bicknacre	32	
13 Danbury	100	
17a Land north of Abbey Fields, East Hanningfield	11	
17b Land east of Highfields Mead, East Hanningfield	20	
Area Total	**4,423**	**87,200sqm**

New supporting infrastructure in Growth Area 3
Secondary school, up to four primary schools and eight early years and childcare nurseries
Neighbourhood centres
Transport including Bus Based Rapid Transit infrastructure, safe multi-user access routes, and capacity improvements to A132
Country park
Financial contributions to provision of education and community facilities, healthcare, sports and recreation facilities, sustainable transport and road network enhancements

New Sites in Chelmsford City Centre and Urban Area

We are allocating some additional sites in Chelmsford City Centre.

Using previously developed – or brownfield – land will help to strengthen the City as a major residential centre to build on its past success and continue its regeneration. It will also reduce the amount of greenfield land we need to allocate.

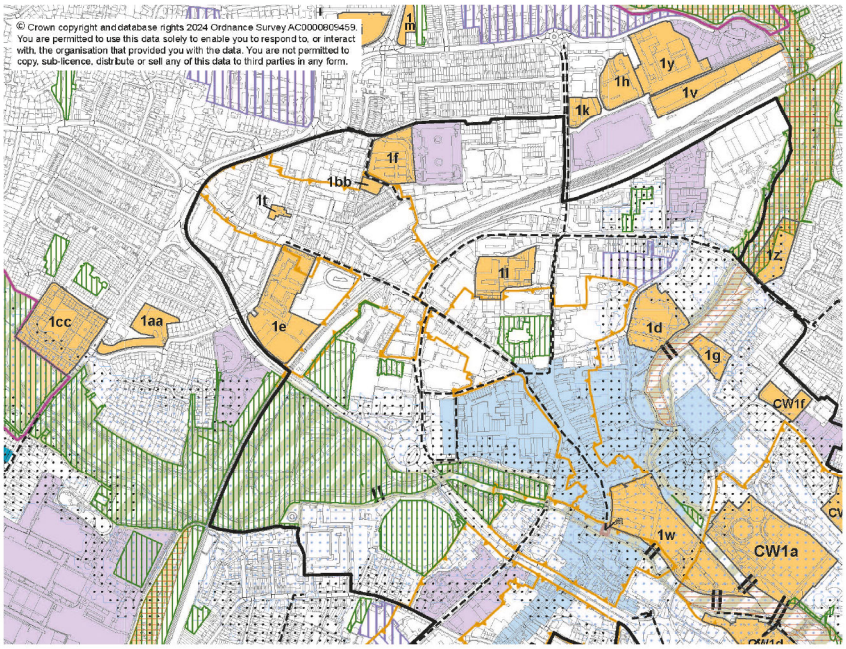
New proposed site allocations will contribute to providing around 3,013 new homes including affordable homes.

Site	Proposal	Supporting Infrastructure
1w Meadows Shopping Centre and Meadows Surface Car Park	Around 757 homes	Enhanced pedestrian and cycle routes Local mobility hub Improved access to waterways On-site open space
1y Land between Hoffmans Way and Brook Street	Around 100 homes	Play area with equipment Pedestrian and cycle connections Preserve nearby listed buildings Public realm improvements
1z Granary Car Park, Victoria Road	Around 50 homes	Links to pedestrian/cycle network Preserve nearby listed buildings Retain natural landscaping and setting Make good use of the waterside location
1aa Coval Lane Car Park	Around 40 homes	Retain natural landscaping Provide sustainable drainage and flood risk management
1bb Glebe Road Car Park	12 homes	Conserve the setting of nearby listed buildings
1cc Andrews Place	183 net new homes	Conserve and enhance biodiversity at Admirals Park Provide connectivity to surrounding travel networks Maintain access to the nearby allotments

There are 20 allocated sites in the City Centre being brought forward from the adopted Local Plan, including some where numbers have been slightly increased.

Sites in the Urban Area will also be brought forward, as they have already been allocated in the adopted Local Plan. These are at:

- West Chelmsford
- East of Chelmsford
- Galleywood
- Writtle



New Proposed Garden Community

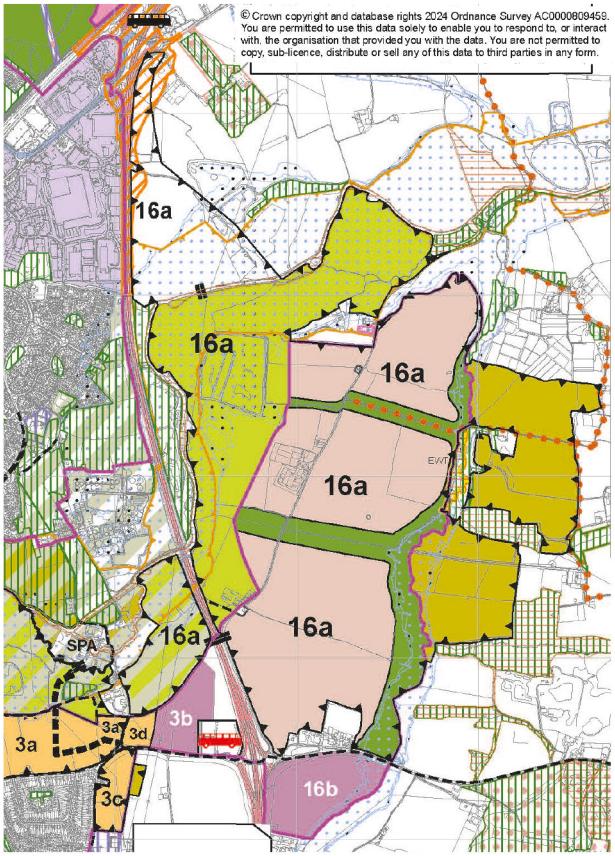
16a – East Chelmsford Garden Community (Hammonds Farm)

We are allocating land for a new East Chelmsford Garden Community. This is centred on Hammonds Farm, to the east of the A12 and north of the A414 Maldon Road.

New homes including affordable	3,000 (plus 1,500 homes post 2041), 20 Traveller Pitches and 13 Travelling Showpeople plots
New employment floorspace	43,000sqm
Supporting infrastructure	Country Park and significant new multi-functional green infrastructure and landscape
	Mixed use centres for food and other shopping, community uses, healthcare provision
	All through school, potential sixth form centre, three primary schools, six early years and childcare nurseries
	New access junction from A414 (shared with 16b); pedestrian and cycle connections; mobility hubs and bus transport; safe pedestrian/cycle access routes under and over the A12, including to Park and Ride site and Beaulieu Park Rail Station
Historic and natural environment	Preserve the Conservation Areas and listed buildings Protect and retain the protected lanes and reinstate historic landscape features
	Conserve Local Wildlife Sites, Nature Reserves, ancient woodlands and SSSI
	Provide sustainable drainage and flood risk management
	Provide a minimum of 20% biodiversity net gain

High quality garden community development will be provided through Garden City Principles. These include:

- community and stakeholder involvement in design and delivery with long-term governance and stewardship arrangements
- meeting the housing needs of all local people
- providing integrated and sustainable transport systems



16b – Land adjacent to A12 Junction 18 – Employment Area

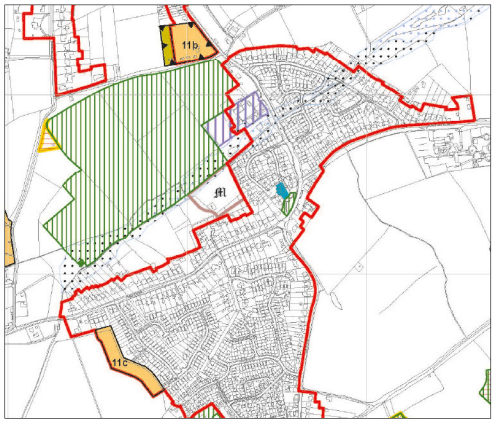
We are allocating a separate area of land for new employment uses adjacent to Junction 8 of the A12, south of the A414.

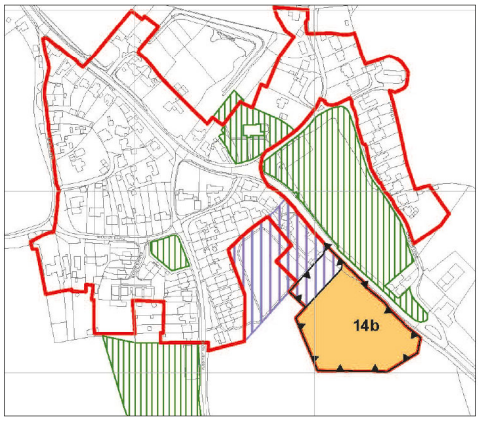
New employment floorspace	43,000sqm for mixed employment types
Supporting infrastructure	New access junction from A414 (shared with 16a) plus multi-user crossings
	Safe pedestrian/cycle access connections including to Park and Ride site, Hammonds Farm, bus stops and Danbury
Historic and natural environment	Preserve Danbury Conservation Area
	Retain boundary trees, plant new trees and extensive landscape buffers

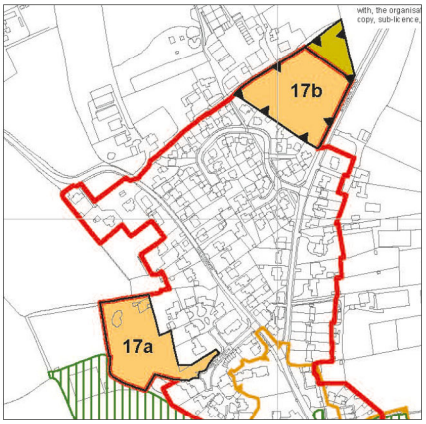
Proposals for Villages

Limited development is proposed in some villages including Bicknacre, Ford End, East Hanningfield, Boreham and Boyton Cross.

We aim to address the Government's requirement to allocate some smaller sites which can be built earlier in the Local Plan period and give smaller development companies the opportunity to build locally. Bicknacre, Ford End and East Hanningfield have primary schools and community facilities, making them suitable for small scale development, which will include affordable homes.

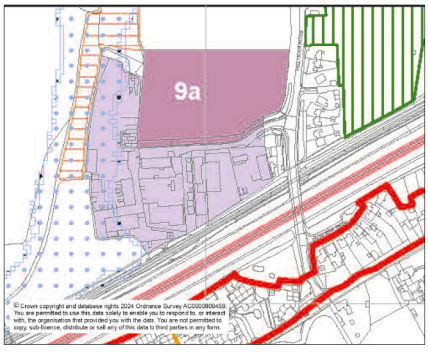


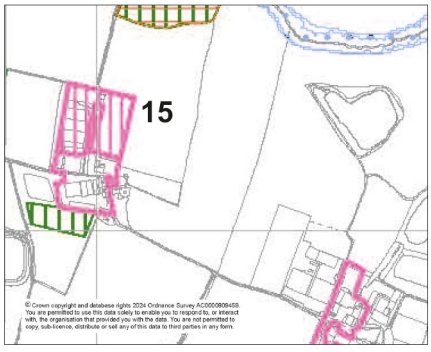




Village	Site	Proposal
Bicknacre	11b Land at Kingsgate, Bicknacre Road	Around 20 homes
	11c Land West of Barbrook Way	Around 20 homes
Ford End	14b Land South of Ford End Primary School	Around 20 homes
East Hanningfield	17a Land North of Abbey Fields	Around 11 homes
	17b Land East of Highfields Mead	Around 20 homes

We also propose to expand two employment sites at Little Boyton Hall Farm, Boyton Cross and Waltham Road, Boreham. Expansion of these well-established employment sites will provide rural employment opportunities and support the sustainable growth and expansion of business in rural areas.





Site	Proposal
9a Waltham Road Employment Area, Boreham	3,500sqm B2/B8 use (general industrial, and storage and distribution)
15 Little Boyton Hall Farm Rural Employment Area, Boyton Cross	6,000sqm B2/B8 use (general industrial, and storage and distribution)

Changes and other consultations

The Pre-Submission Local Plan includes changes made following the Preferred Options consultation in 2024, as summarised below:

- Minor changes to the supporting text for Strategic Priorities, Vision and Spatial Principles
- Changes to strategic policies S4, S9, S6 and S7
- Deletion of Kay Metzeler site, Brook Street (Site 1x) which is longer available for housing development; and Land west of 20 Back Lane, Ford End (Site 14a) as it is no longer considered suitable
- Allocation of a new housing site at Andrews Place, West of Rainsford Lane (Site 1cc)
- Increased capacity of the Meadows Shopping Centre allocation (Site 1w)
- Limited changes to development management policies, the Draft Policies Map and glossary.

The Pre-Submission Local Plan has also been updated to:

- Provide greater clarification and consistency
- Respond to discussions with Duty to Co-operate bodies and infrastructure providers
- Reflect new evidence studies including an updated Infrastructure Delivery Plan, Strategic Housing Needs Assessment, Archaeology Assessment, Open Space Study and Local Wildlife Sites Review, along with housing data and planning permissions
- Reference the housing numbers and transitional arrangements for the progression of Local Plans at an advanced stage of preparation.

Other consultations: Integrated Impact Assessment (IIA)

The Local Plan is subject to an ongoing process of assessing its proposals against a sustainability framework. This covers the potential environmental, social, economic and health performance of the Pre-Submission Local Plan and any reasonable alternative approaches.

Other consultations: Co-Living Housing Planning Advice Note

This provides new practical guidance to potential promoters or developers of co-living housing in Chelmsford, to ensure they meet the Council's expectations.

Other consultations: Consultation Draft Planning Obligations Supplementary Planning Document

This sets out how the Council will seek planning obligations when considering planning applications, including updates to the 2021 published version.

Have your say

Find out more

View the consultation documents on:

- our specially designed consultation portal **www.chelmsford.gov.uk/planningpolicyconsult**
- on our website **www.chelmsford.gov.uk/lp-review**

The consultation documents are:

- Pre-Submission (Regulation 19) Local Plan
- Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment

Visit one of our exhibitions

Thursday 27 February	Council Chamber, Civic Centre	6pm – 8pm
Friday 28 February	Council Chamber, Civic Centre	2pm – 4pm
Saturday 1 March	Council Chamber, Civic Centre	10am – 12noon
Monday 24 February to Sunday 2 March	High Chelmer Shopping Centre (unstaffed)	7am – 6.30pm
Thursday 13 February to Tuesday 25 February	South Woodham Town Council, Champions Manor Hall, Hullbridge Road, SWF (unstaffed)	9am – 4pm

How to comment

This consultation is a bit different to the previous stages. The Government asks you to consider whether the Pre-Submission Local Plan is legally compliant and consistent with national policy, known as the 'Tests of Soundness'. There are specific consultation questions based on a suggested model representation form by the Planning Inspector.

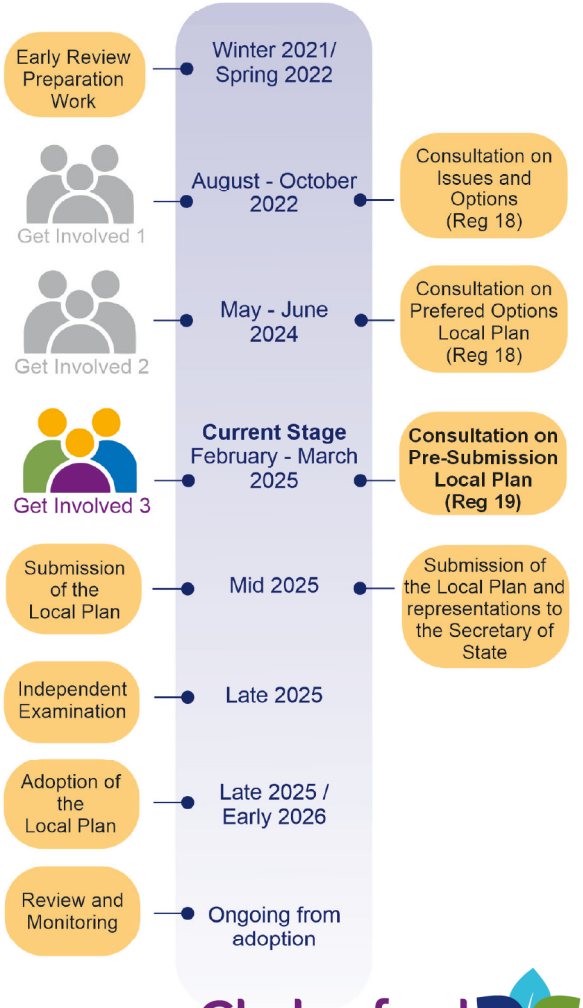
The consultation on the Pre-Submission documents runs for 6 weeks from 10am on Tuesday 4 February 2025 to 4pm on Tuesday 18 March 2025. Comments made before or after these dates cannot be considered.

You can respond:

- Via the Council's consultation portal at **www.chelmsford.gov.uk/planningpolicyconsult.** This is our preferred way to receive comments
- By email or post using a Pre-Submission Representation Form submitted to **planning.policy@chelmsford.gov.uk.** or by post to Spatial Planning Services, Chelmsford City Council, Duke Street, Chelmsford, CM1 1JE

Representation forms are available online at **www.chelmsford.gov.uk/lp-review** or on request.

Next Steps
All responses will be submitted to the Planning Inspector, alongside the Pre-Submission Local Plan and evidence base. The Council will produce a summary of the main issues raised in the consultation responses for the Inspector and publish this online.



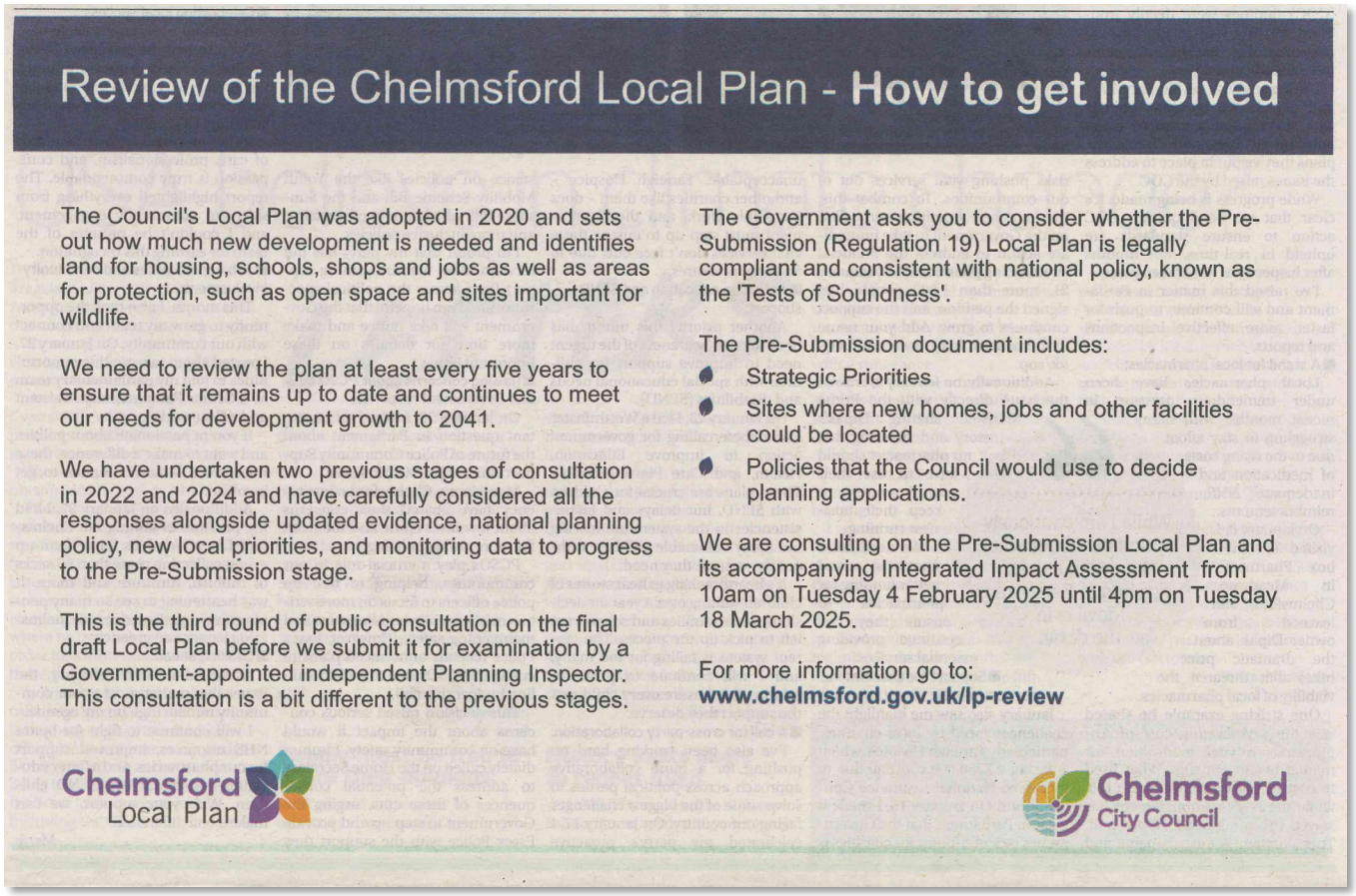
Chelmsford Local Plan

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

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



Essex Chronicle Advert 06/02/2025



Review of the Chelmsford Local Plan - **How to get involved**

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

We need to review the plan at least every five years to ensure that it remains up to date and continues to meet our needs for development growth to 2041.

We have undertaken two previous stages of consultation in 2022 and 2024 and have carefully considered all the responses alongside updated evidence, national planning policy, new local priorities, and monitoring data to progress to the Pre-Submission stage.

This is the third round of public consultation on the final draft Local Plan before we submit it for examination by a Government-appointed independent Planning Inspector. This consultation is a bit different to the previous stages.

The Government asks you to consider whether the Pre-Submission (Regulation 19) Local Plan is legally compliant and consistent with national policy, known as the 'Tests of Soundness'.

The Pre-Submission document includes:

- Strategic Priorities
- Sites where new homes, jobs and other facilities could be located
- Policies that the Council would use to decide planning applications.

We are consulting on the Pre-Submission Local Plan and its accompanying Integrated Impact Assessment from 10am on Tuesday 4 February 2025 until 4pm on Tuesday 18 March 2025.

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

Chelmsford Local Plan

Chelmsford City Council

Posters were sent to nearly 140 locations in including libraries, local shops, medical centres, and churches

Civic Centre Duke Street
Chelmsford Essex CM1 1JE

Telephone: 01245 606330
Date: 4 February 2025

Dear Sir/Madam,

Poster to promote public consultation on the review of the Chelmsford Local Plan

Chelmsford City Council is reviewing its adopted Local Plan. The Local Plan shapes future growth and development across Chelmsford City Council's area. It sets out a positive vision, identifies where and how new development should take place in the future as well as areas for protection. We adopted our current Local Plan in May 2020. We need to review the plan at least every five years to make sure it remains up to date and meets the changing needs for development growth to 2041.

The next stage in the Review of the Chelmsford Local Plan is to consult on the Pre-Submission (Regulation 19) Local Plan. The consultation is open for your comments from **10am on Tuesday 4 February 2025 to 4pm on Tuesday 18 March 2025.**

An A3 poster which promotes the consultation is enclosed. We would be grateful if this could be displayed in a public place until 18 March 2025.

If you have any queries or would like more information on the review of the Local Plan, please visit www.chelmsford.gov.uk/lp-review, email planning.policy@chelmsford.gov.uk or telephone (01245) 606330.

Yours faithfully,

Jeremy Potter

Spatial Planning Services Manager

Review of Chelmsford Local Plan – **How to get involved**

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

We need to review the plan at least every five years to ensure that it remains up to date and continues to meet our needs for development growth to 2041.

We have undertaken two previous stages of consultation in 2022 and 2024 and have carefully considered all the responses alongside updated evidence, national planning policy, new local priorities, and monitoring data to progress to the Pre-Submission stage.

This is the third round of public consultation on the final draft Local Plan before we submit it for examination by a Government-appointed independent Planning Inspector. This consultation is a bit different to the previous stages. The Government asks you to consider whether the Pre-Submission (Regulation 19) Local Plan is legally compliant and consistent with national policy, known as the 'Tests of Soundness'.

The Pre-Submission document includes:

- Strategic Priorities
- Sites where new homes, jobs and other facilities could be located
- Policies that the council would use to decide planning applications.

We are consulting on the Pre-Submission Local Plan and its accompanying Integrated Impact Assessment from 10am on Tuesday 4 February 2025 until 4pm on Tuesday 18 March 2025.

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

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

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

Visit an exhibition:

Thursday 27th February 2025	Civic Centre	6pm - 8pm
Friday 28th February 2025	Civic Centre	2pm - 4pm
Saturday 1st March 2025	Civic Centre	10am - 12pm

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

Chelmsford Local Plan

Chelmsford City Council

Site notices were posted at 15 new allocation sites – examples:



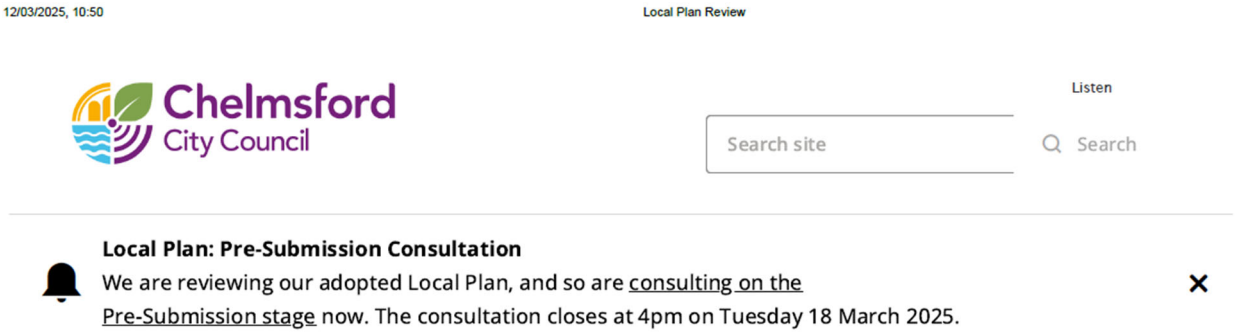




Staff added an **e-mail banner** to their accounts – and the **Website also carried a banner** during the consultation







Chelmsford Local Plan

Local Plan Review Newsletter

NUMBER 3 February 2025

What is a Local Plan?

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

Why are we reviewing the adopted Chelmsford Local Plan?

We adopted our current Local Plan in May 2020 and good progress is being made with implementing it. Government requirements mean we must provide more homes, so we need to review the plan at least every five years to ensure that it remains up to date and continues to meet our needs for development growth to 2041. If the Local Plan becomes out of date, the Council could have very little influence over the location of new development and supporting infrastructure such as employment opportunities, new schools, healthcare provision and upgraded transport infrastructure. Our aim is to get the right type of development in the right places to meet the growing needs of local people and businesses while protecting our environment.

What stage is the review at?

This is the third, and final round of public consultation on the final draft Local Plan before we submit it for examination by a Government-appointed independent Planning Inspector. This is called the Pre-Submission stage. Many people and organisations commented on the Issues and Options consultation in 2022 and the Preferred Options consultation in 2024. All the comments to the previous consultations have been carefully considered and used to progress the Local Plan alongside updated evidence base, national planning policy, new local priorities, and monitoring data.

In response to the consultation we have made a number of changes. 'You Said We Did' feedback reports and the evidence base of technical studies can be read on our website: **www.chelmsford.gov.uk/lp-review**

The Pre-Submission document sets out the Council's final policies including site specific land allocations for new housing, employment and other uses, as well as areas and places for protection.

This consultation is a bit different to the previous stages. The Government asks you to consider whether the Pre-Submission document is legally compliant and consistent with national policy, known as the 'Tests of Soundness'. There are specific consultation questions based on a suggested model representation form by the Planning Inspector.



New Development: Where and how much?

The Pre-Submission Local Plan follows the approach in the adopted Local Plan and previous Preferred Options Consultation Document by continuing to focus new housing and employment growth to the most sustainable locations in three Growth Areas. Site allocations in the adopted plan which are not yet built are carried forward in the Pre-Submission plan.

Many of these sites are now coming forward, with masterplans being approved and planning applications decided or in progress and some sites have started building.

To meet additional growth needs to 2041 it is estimated that we need to allocate new sites for around 4,233 new homes, and around 162,646 sqm of new employment floorspace. This is in addition to the new homes in the adopted Local Plan. To accommodate this, we have reviewed the Spatial Strategy and are allocating new development sites and expanding some existing allocations. The Spatial Strategy (Policy S7) shown in the Pre-Submission Local Plan has been informed by the outcomes of the previous consultations and further evidence. **We are not considering growth in the Green Belt.**



Central and Urban Chelmsford

Continued focus on strengthening the city as a centre for housing, employment and retail. Two existing allocations carried forward to the West and East of Chelmsford maximise cycling and walking opportunities into the City Centre.

1 Previously developed sites in Chelmsford Urban Area
- 3,013 homes (of which around 1,140 are on new allocations such as Meadows Shopping Centre and Car Park, Chelmer Waterside and Andrews Place)
- 4,000sqm employment/business space

2 West Chelmsford
- 880 homes
- 5 Travelling Showpeople Plots
- Primary school and nursery
- Neighbourhood Centre

3a-3d East of Chelmsford
- 3a Manor Farm: 360 homes
- 3b Land North of Maldon Road: 5,000sqm Office/Business Park
- 3c Land South of Maldon Road: 109 homes
- 3d Land North of Maldon Road: 65 homes
- Country Park
- New pedestrian and cycle bridge to Sandford Mill

4 Land North of Galleywood Reservoir
- 24 homes

5 Land surrounding Telephone Exchange, Ongar Road, Writtle
- 25 homes

North Chelmsford

North Chelmsford (Chelmsford Garden Community) will continue as a key area for new neighbourhoods and employment opportunities. New smaller allocation at Ford End and extension to two existing employment areas. Existing allocations carried forward at Great Leighs and Broomfield.

6 North East Chelmsford (Chelmsford Garden Community)
- 5,569 homes (plus 680 homes post 2041)
- 10 Gypsy and Traveller Pitches
- 56,946sqm Office/Business Park
- Country Park
- Chelmsford North East Bypass
- 4 Neighbourhood Centres
- 1 all-through school
- 3 primary schools with 4 nurseries

7a-7c Great Leighs
- 7a Land at Moulsham Hall: 750 homes and 5 Travelling Showpeople Plots
- 7b Land East of London Road: 250 homes
- 7c Land North and South of Banters Lane: 100 homes
- Neighbourhood Centre
- Primary school with nursery

8 North of Broomfield
- 512 homes
- Neighbourhood Centre
- Nursery

9a Waltham Road Employment Area
- 3,500sqm B2/B8 Use

14b Ford End
- 14b Land South of Ford End Primary School: 20 homes

15 Little Boyton Hall Farm Rural Employment Area
- 6,000sqm employment/business space

South and East Chelmsford

Proposals include a new garden community at East Chelmsford (Hammonds Farm), and a strategic employment site. New smaller allocations in Bicknacre and East Hanningfield. Existing allocations carried forward at South Woodham Ferrers, Bicknacre and Danbury.

10 North of South Woodham Ferrers
- 1,220 homes
- 5 Travelling Showpeople Plots
- 1,200sqm Business Space
- Neighbourhood Centre
- 2 nurseries and potential primary school

11b & 11c Bicknacre
- 11b Land at Kingsgate: 20 homes
- 11c Land West of Barbrook Way: 20 homes

12 St Giles, Bicknacre
- 32 homes

13 Danbury
- 100 homes

16a East Chelmsford Garden Community (Hammonds Farm)
- 3,000 homes to 2041 (plus 1,500 homes post 2041)
- 20 Gypsy and Traveller Pitches
- 13 Travelling Showpeople Plots
- 43,000sqm Business Space
- Country Park
- Neighbourhood Centres
- 1 co-located primary and secondary school
- 2 primary schools and nursery
- 3 nurseries

16b Land adjacent to A12 Junction 18
- 43,000sqm Business Space

17a & 17b East Hanningfield
- 17a Land North of Abbey Fields: 11 homes

17b Land East of Highfield Mead: 20 homes

Highlighted text: New development allocations in the Pre-Submission Local Plan.

Local Plan policies

We have included new and updated policies in the Pre-Submission Local Plan. Topics include housing, economy, environment, health and wellbeing, travel and transport, heritage, and design. We have not fundamentally changed the general approach in the adopted Local Plan, but have used updated information, previous consultation responses and addressed some of our major challenges including acting on the climate emergency, responding to the housing crisis and strengthening community ties.

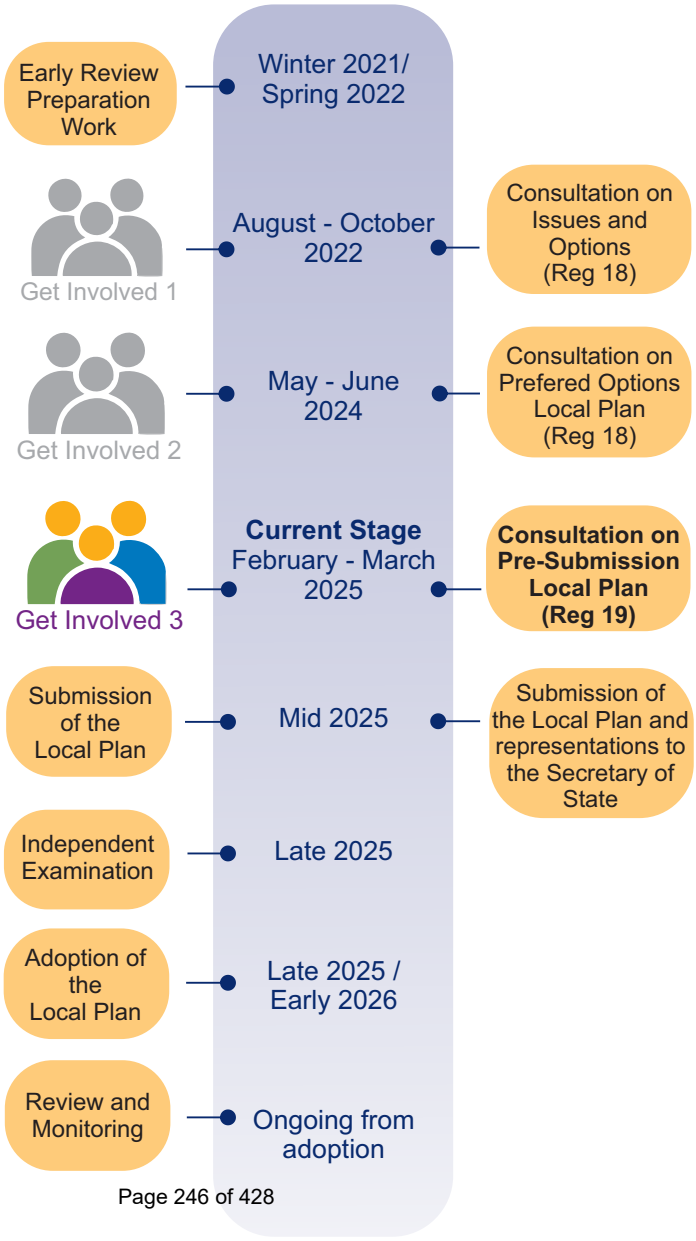
What is the Integrated Impact Assessment (IIA)?

The IIA identifies the key sustainability issues for the Review of the Local Plan. These feed into a framework against which the proposals have been assessed. It covers the potential environmental, social, economic and health performance of the Local Plan and any reasonable alternatives. The IIA includes:

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

We will be consulting on the IIA as part of the Pre-Submission consultation.

What is the Local Plan timetable?



Where can I view the consultation documents?

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

We will also be holding in-person exhibitions in the Council Chamber at the Civic Centre, Duke Street. These exhibitions will provide an opportunity for you to find out more and discuss the consultation with a Planning Officer. The exhibitions will be on:

- Thursday 27th February 6pm- 8pm
- Friday 28th February 2pm - 4pm
- Saturday 1st March 10am-12noon

Consultation dates and how do I respond?

The consultation on the Pre-Submission documents runs for 6 weeks from 10am on Tuesday 4 February 2025 to 4pm on Tuesday 18 March 2025. Comments made before or after these dates cannot be considered.

You can respond:

- Via the Council's consultation portal at **www.chelmsford.gov.uk/planningpolicyconsult.** This is our preferred way to receive comments
- By email or post using a Pre-Submission Representation Form submitted to **planning.policy@chelmsford.gov.uk.** or by post to Spatial Planning Services, Chelmsford City Council, Duke Street, Chelmsford, CM1 1JE

Representation forms are available online at **www.chelmsford.gov.uk/lp-review** or on request.

Full details on how to make your comments are available online at **www.chelmsford.gov.uk/lp-review.**

Comments to the 2022 and 2024 consultations are not sent to the Planning Inspector so you will need to make a new representation if you still have relevant comments to make.

Next Steps
All responses will be submitted to the Planning Inspector, alongside the Pre-Submission Local Plan and evidence base. The Council will produce a summary of the main issues raised in the consultation responses for the Inspector and publish this online.

Chelmsford City Council

Chelmsford Local Plan Pre-Submission (Regulation 19) Document Parish/Town Council Information Pack
Planning Policy, February 2025

Part A - General information that is relevant to all Parish / Town Councils

Review of Chelmsford's Local Plan

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

We need to review the plan at least every five years to ensure that it remains up to date and continues to meet our needs for development growth to 2041. This includes new homes, employment opportunities and facilities for local people such as new schools, healthcare provision and upgraded transport infrastructure.

We are currently at the Pre-Submission stage in the plan review process. Many people and organisations commented on the first Issues and Options stage consultation in 2022 and the second Preferred Options consultation in 2024. All the responses have been carefully considered and used to progress to the Pre-Submission (Regulation 19) Local Plan stage alongside an updated plan evidence base, national planning policy, local City Council priorities and monitoring data.

The consultation on the Pre-Submission documents runs for a period of six weeks from 10am on Tuesday 4 February 2025 to 4pm on Tuesday 18 March 2025. Communities can find out more at www.chelmsford.gov.uk/lp-review. This consultation is the last of three formal stages in the preparation of the review of the adopted Chelmsford Local Plan. We are consulting on the:

- Chelmsford Local Plan – Pre-Submission (Regulation 19) Document, and
- Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment.

In addition, the Council is also consulting on the:

- Co-Living Housing Planning Advice Note, and
- Consultation Draft Planning Obligations Supplementary Planning Document (SPD).

Chelmsford Local Plan – Pre-Submission (Regulation 19) Document

The Chelmsford Local Plan – Pre-Submission (Regulation 19) Document is a full draft local plan. It includes updated and new Strategic Priorities, updated and new site allocations for new homes and employment, and policies that will be used to decide planning applications. The aim is to get the right type of development in the right places to meet the growing needs of local people and businesses, whilst protecting our environment.

The Chelmsford Local Plan – Pre-Submission (Regulation 19) Document follows the approach in the adopted Local Plan by continuing to focus new housing and employment growth to the most sustainable locations in three Growth Areas. The existing site allocations in the adopted plan which are not yet built are carried forward. Many of these sites are now coming forward, with masterplans being approved and planning applications decided or in progress. Some sites are being developed now.

This consultation is a different to the previous stages. The Government asks you to consider whether the Pre-Submission Local Plan is legally compliant and consistent with national policy, known as the 'Tests of Soundness'. There are specific consultation questions based on a suggested model representation form by the Planning Inspector.

Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment

The adopted Local Plan was developed alongside a comprehensive Sustainability Appraisal (SA) and Habitats Regulations Appraisal (HRA) process. For this review process other aspects of sustainable development are being considered in an Integrated Impact Assessment (IIA).

The Review of the Adopted Chelmsford Local Plan: Pre-Submission IIA assesses the Pre-Submission (Regulation 19) Local Plan against a range of social, environmental, health and economic indicators and helps to identify all the likely significant effects. It advises on ways in which any adverse effects could be avoided, reduced or mitigated or how any positive effects could be maximised. This helps to ensure that the policies in the Pre-Submission (Regulation 19) Local Plan are promoting sustainable development.

Other consultations: Co-Living Housing Planning Advice Note

This provides new practical guidance to potential promoters or developers of co-living housing in Chelmsford, to ensure they meet the Council's expectations.

Other consultations: Consultation Draft Planning Obligations Supplementary Planning Document (SPD)

This sets out how the Council will seek planning obligations when considering planning applications, including updates to the 2021 published version.

Where to view the consultation documents

You can read the consultation documents in the following ways:

- On the Council's Consultation Portal at www.chelmsford.gov.uk/planningpolicyconsult. This system also allows you to submit comments to the consultations
- On the Council's website alongside the Local Plan evidence base documents at www.chelmsford.gov.uk/lp-review
- At the Chelmsford City Council Customer Service Centre, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford CM1 1JE (10am to 4pm Monday to Friday).
- At the following drop-in public exhibitions. These will provide an opportunity to meet an officer face-to-face unless otherwise stated.

Location	Date	Time
Council Chamber, Civic Centre, Duke Street, Chelmsford, CM1 1JE	Thursday 27 February Friday 28 February Saturday 1 March	6pm - 8pm 2pm - 4pm 10am - 12noon
High Chelmer Shopping Centre, Exchange Way, Chelmsford, CM1 1XB	Monday 24 February to Sunday 2 March	Unstaffed exhibition panels displayed all-day during shopping centre opening hours
South Woodham Town Council, Champions Manor Hall, Hullbridge Road, South Woodham Ferrers, CM3 5LJ	Thursday 13 February to Tuesday 25 February	Unstaffed exhibition panels displayed 9am - 4pm (except weekends)

Please check our website www.chelmsford.gov.uk/lp-review for any updates before making your journey.

How to comment

You can comment on the consultation documents in the following ways:

Online Consultation Portal:
Go to: www.chelmsford.gov.uk/planningpolicyconsult where you can:

- Read the consultation documents
- Make your comments via the specially designed representation form
- Sign up for alerts to feedback reports and future consultations

This is our preferred means of receiving comments as it ensures that your comments are recorded accurately and are processed quickly.

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

In writing:
If you prefer to send comments in writing, please fill in the relevant specially designed representation forms for each consultation event.

Local Plan representation forms cover the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document and the Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment consultations.

The Local Plan representation forms can be downloaded at www.chelmsford.gov.uk/lp-review. Paper copies of these representation forms for are also available from Chelmsford City Council's Customer Service Centre (details above) or on request by telephoning (01245) 606330 or emailing planning.policy@chelmsford.gov.uk

Forms can be returned:

- By e-mail to planning.policy@chelmsford.gov.uk
- By post to Planning Policy, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE
- By hand to Chelmsford City Council Customer Service Centre (details above).

The use of the Local Plan representation forms is strongly recommended as this will ensure that comments are related to the matters relevant to the subsequent Independent Examination by a Planning Inspector.

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

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

Please note that any representations must be received by the Council no later than 4pm on Tuesday 18 March 2025. We are unable to accept anonymous representations, and any comments received after the closing date cannot be accepted.

Part B – Optional information by Parish/Town Council area

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in the Unparished Area of Chelmsford?

The plan identifies site allocations in Chelmsford's Urban Area including the City Centre for new employment and around 3,013 new homes. This comprises 20 sites carried forward from the adopted Local Plan some of which have increased numbers

of homes as justified by the plan evidence base (Sites 1a – 1b, 1d – 1i and 1k – 1v). There are also six new site allocations:

- Site 1w Meadows/Meadows Surface Car Park for around 757 new homes
- Site 1y Land between Hoffmans Way and Brook Street (Marriage's Mill) for around 100 new homes
- Site 1z Granary Car Park, Victoria Road for around 50 new homes
- Site 1aa Coval Lane Car Park for around 40 new homes
- Site 1bb Glebe Road Car Park for around 12 new homes
- Site 1cc Andrews Place for 250 new affordable homes (183 net new affordable homes)

See part C for more details of site allocations.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Boreham Parish?

The plan allocates two new sites:

- Site 9a Waltham Road Employment Area. This is identified for around 3,500sqm of new employment land as an expansion of the existing industrial area
- Site 16a East Chelmsford Garden Community (Hammonds Farm) lies adjacent to Boreham Parish to the south but proposals for a new connection to Junction 19 of the A12 and a small portion of the country park lie within Boreham Parish. Most of the wider site is beyond Boreham Parish. The whole site is identified for around 3,000 new homes, 43,000 sqm of employment floorspace and two Gypsy and Traveller sites, each for 10 pitches in the period up to 2041 and 13 Travelling Showpeople plots alongside supporting infrastructure including transport, new schools and early years and childcare provision, health care, utility services and green infrastructure together with retail, community, employment, leisure uses and a country park. The site is also considered able to provide a further 1,500 new homes in the period beyond 2041.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Broomfield Parish?

The plan carries forward the existing allocation of Land North of Broomfield (Site 8) in the adopted Local Plan but with an increased number of homes as justified by the planning application process. It is identified for 512 new homes alongside supporting infrastructure including a new neighbourhood centre. This site partially lies within Broomfield Parish.

No additional housing or employment sites are identified in Broomfield Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Chelmer Village Parish?

The plan allocates a new East Chelmsford Garden Community (Hammonds Farm) (Site 16a) which lies adjacent to Chelmer Village Parish to the east of the A12 but proposals for a new connection to Junction 19 of the A12 within Chelmer Village Parish. Most of the wider site is beyond Chelmer Village Parish. The whole site is identified for around 3,000 new homes, 43,000 sqm of employment floorspace and two Gypsy and Traveller sites, each for 10 pitches in the period up to 2041 and 13 Travelling Showpeople plots alongside supporting infrastructure including transport, new schools and early years and childcare provision, health care, utility services and green infrastructure together with retail, community, employment, leisure uses and a country park. The site is also considered able to provide a further 1,500 new homes in the period beyond 2041.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Chelmsford Garden Community Parish?

The plan carries forward the existing allocation of North East Chelmsford (Chelmsford Garden Community) (Site 6). It identifies 6,569 new homes in the period to 2041. It also allocates around 56,946sqm of employment land and a Gypsy and Traveller site for 10 pitches. The amount and type of proposed development is greater than that allocated in the adopted Local Plan as justified by an approved masterplan (Development Framework Document). The development will be supported by new infrastructure including transport, new schools and early years and childcare provision, health care, utility services and green infrastructure schools, a country park/destination parks and mixed use village centres. The site is also considered able to provide a further 681 new homes beyond 2041.

No additional housing or employment sites are identified in Chelmsford Garden Community Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Chignal Parish?

No housing or employment sites are identified in Chignal Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Danbury Parish?

The plan allocates a new East Chelmsford Garden Community (Hammonds Farm) (Site 16a) which lies to the west of Danbury Parish except for land identified for conservation and strategic landscape enhancement. Most of the wider site is beyond Danbury Parish. The whole site is identified for around 3,000 new homes, 43,000 sqm of employment floorspace and two Gypsy and Traveller sites, each for 10

pitches in the period up to 2041 and 13 Travelling Showpeople plots alongside supporting infrastructure including transport, new schools and early years and childcare provision, health care, utility services and green infrastructure together with retail, community, employment, leisure uses and a country park. The site is also considered able to provide a further 1,500 new homes in the period beyond 2041.

The plans also carries forward the existing allocation of 100 new homes from the adopted Local Plan (Site 13). The location of these have been determined through the 'made' Danbury Neighbourhood Plan and include five sites which are shown on the Draft Policies Map.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in East Hanningfield Parish?

The plan identifies two new smaller site allocations in East Hanningfield – Site 17a Land North of Abbey Fields for around 11 homes and Site 17b Land East of Highfields Mead for around 20 homes. These sites are no larger than 1 hectare in size and the site boundaries are defined on the Draft Policies Map.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Galleywood Parish?

The plan carries forward the existing allocation of land north of Galleywood Reservoir for 24 new affordable homes (Site 4) but with an increased number of homes as justified by the planning application process.

No additional housing or employment sites are identified in Galleywood Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Good Easter Parish?

No housing or employment sites are identified in Good Easter Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Great & Little Leighs Parish?

The plan carries forward three existing site allocations:

- Site 7a Land at Moulsham Hall for around 750 new homes and a Travelling Showpeople site for 5 plots alongside supporting infrastructure including a new primary school and neighbourhood centre. The site is also allocated for an increased number of homes as justified by the planning application process. The Travelling Showpeople site is also shown in a new location to the north of Great Leighs village between the A131 and London Road

- Site 7b Land East of London Road for around 250 new specialist residential homes for older persons to include affordable housing. The site is also allocated for an increased number of homes as justified by the planning application process.
- Site 7c Land North and South of Banters Lane for around 100 new homes.

No additional housing or employment sites are identified in Great & Little Leighs Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Great Baddow Parish?

The plan carries forward the existing allocation of East of Chelmsford – Manor Farm (Site 3a) but with an increased number of homes as justified by the planning application process. This site is identified for 360 new homes alongside supporting infrastructure including a new country park.

No additional housing or employment sites are identified in Great Baddow Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Great Waltham Parish?

The plan identifies one small site allocation in Ford End Site 14b Land South of Ford End Primary School for around 20 homes. A new off-road parking area is to be provided for use by Ford End Primary School. The site is no larger than 1 hectare in size and the site boundary is defined on the Draft Policies Map.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Highwood Parish?

No housing or employment sites are identified in Highwood Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Little Baddow Parish?

The plan proposes a new East Chelmsford Garden Community (Hammonds Farm) (Site 16a) which predominately lies within Little Baddow and Sandon Parishes. The wider site is identified for around 3,000 new homes, 43,000 sqm of employment floorspace and two Gypsy and Traveller sites, each for 10 pitches in the period up to 2041 and 13 Travelling Showpeople plots alongside supporting infrastructure including transport, new schools and early years and childcare provision, health care, utility services and green infrastructure together with retail, community, employment, leisure uses and a country park. The site is also considered able to provide a further 1,500 new homes in the period beyond 2041.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Little Waltham Parish?

The plan carries forward the existing allocation of land North of Broomfield (Site 8) in the adopted Local Plan but with an increased number of homes as justified by the planning application process. It is identified for 512 new homes alongside supporting infrastructure including a new neighbourhood centre. This site is partially within Little Waltham Parish.

No additional housing or employment sites are identified in Little Waltham Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Margaretting Parish?

No housing or employment sites are identified in Margaretting Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Mashbury Parish?

No housing or employment sites are identified in Mashbury Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Pleshey Parish?

No housing or employment sites are identified in Pleshey Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Rettendon Parish?

No housing or employment sites are identified in Rettendon Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Roxwell Parish?

The plan allocates around 6,000sqm of new employment land as an expansion of the existing Little Boyton Hall Farm Rural Employment Area (Site 15).

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Runwell Parish?

No housing or employment site allocations are identified in Runwell Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Sandon Parish?

The plan carries forward three existing site allocations:

- Site 3b East of Chelmsford – Land North of Maldon Road (Employment) for around 5,000sqm of new employment floorspace alongside supporting infrastructure including an early years and childcare nursery
- Site 3c East of Chelmsford – Land South of Maldon Road for 109 new homes. This is an increased number of homes and a new area for SuDS (sustainable drainage system) as justified by the Masterplan process
- Site 3d East of Chelmsford – Land North of Maldon Road (Residential) for 65 new homes. This is an increased number of homes, as justified by the masterplan process.

The plan allocates two new sites:

- A new East Chelmsford Garden Community (Hammonds Farm) (Site 16a) which predominately lies within Sandon and Little Baddow Parishes. The wider site is identified for around 3,000 new homes, 43,000 sqm of employment floorspace and two Gypsy and Traveller sites, each for 10 pitches in the period up to 2041 and 13 Travelling Showpeople plots alongside supporting infrastructure including transport, new schools and early years and childcare provision, health care, utility services and green infrastructure together with retail, community, employment, leisure uses and a country park. The site is also considered able to provide a further 1,500 new homes in the period beyond 2041
- Site 16b Land adjacent to A12 Junction 18 Employment Area. This is identified for around 43,000sqm of new employment land.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in South Hanningfield Parish?

No housing or employment sites are identified in South Hanningfield Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in South Woodham Ferrers?

The consultation document carries forward the existing allocation of North of South Woodham Ferrers (Site 10) but with an increased number of homes and employment as justified by the masterplan process. It is identified for 1,220 new homes, around 1,200sqm of business floorspace and a Travelling Showpeople site for 5 plots alongside supporting infrastructure including new early years and childcare nurseries.

No housing or employment sites are identified in South Woodham Ferrers Parish within the Pre-Submission Local Plan.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Springfield Parish?

No housing or employment sites are identified in Springfield Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Stock Parish?

No housing or employment sites are identified in Stock Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in West Hanningfield Parish?

No housing or employment sites are identified in West Hanningfield Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Woodham Ferrers and Bicknacre Parish?

The plan carries forward one existing allocation in Bicknacre - Site 12 St Giles, Moor Hall Lane for around 32 new units for specialist residential accommodation (SRA). The plan also identifies two new smaller site allocations in Bicknacre – Site 11b Land at Kingsgate, Bicknacre Road and Site 11c Land West of Barbrook Way both for around 20 new homes. The sites are no larger than 1 hectare in size and the site boundaries are defined on the Draft Policies Map.

Does the Chelmsford Local Plan Pre-Submission (Regulation 19) Document identify new development in Writtle Parish?

The plan carries forward two existing allocations:

- Site 2 West Chelmsford but with an increased number of homes as justified by the planning application process. It is identified for 880 new homes and a Travelling Showpeople site for 5 plots alongside supporting infrastructure including a new primary school and neighbourhood centre
- Site 5 Land Surrounding Telephone Exchange, Ongar Road for around 25 new homes. A smaller site boundary is shown on the Draft Policies Map to reflect the land promoted for development.

No additional housing or employment sites are identified in Writtle Parish within the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Part C – Chelmsford Local Plan Pre-Submission (Regulation 19) Document - SITE ALLOCATIONS AT A GLANCE

Site No.	Site name	Location	Proposed development	Site Status	Policies Map No.
1a	Chelmer Waterside allocations (CW1a and CW1c-f)	Chelmsford Urban Area	880 homes	In Adopted Local Plan	4
1b	Former St Peter's College, Fox Crescent	Chelmsford Urban Area	185 homes, around 60 extra care independent living accommodation	In Adopted Local Plan	4
1d	Riverside Ice and Leisure Land, Victoria Road	Chelmsford Urban Area	150 homes	In Adopted Local Plan	4
1e	Civic Centre Land, Fairfield Road	Chelmsford Urban Area	100 homes	In Adopted Local Plan	4
1f	Eastwood House Car Park, Glebe Road	Chelmsford Urban Area	197 homes	In Adopted Local Plan	4
1g	Chelmsford Social Club, Springfield Road	Chelmsford Urban Area	29 homes	In Adopted Local Plan	4
1h	Ashby House Car Parks, New Street	Chelmsford Urban Area	80 homes	In Adopted Local Plan	4
1i	Rectory Lane Car Park West	Chelmsford Urban Area	75 homes, potential for student accommodation	In Adopted Local Plan	4
1k	Former Chelmsford Electrical and Car Wash, Brook Street	Chelmsford Urban Area	41 homes	In Adopted Local Plan	4
1l	BT Telephone Exchange, Cottage Place	Chelmsford Urban Area	30 homes	In Adopted Local Plan	4

Site No.	Site name	Location	Proposed development	Site Status	Policies Map No.
1m	Rectory Lane Car Park East	Chelmsford Urban Area	23 homes, potential for student accommodation	In Adopted Local Plan	4
1n	Waterhouse Lane Depot and Nursery	Chelmsford Urban Area	20 homes	In Adopted Local Plan	4
1p	British Legion, New London Road	Chelmsford Urban Area	15 homes	In Adopted Local Plan	4
1q	Rear of 17 to 37 Beach's Drive	Chelmsford Urban Area	18 homes	In Adopted Local Plan	4
1r	Garage Site, St Nazaire Road	Chelmsford Urban Area	12 homes	In Adopted Local Plan	4
1s	Garage Site and Land, Medway Close	Chelmsford Urban Area	6 homes	In Adopted Local Plan	4
1t	Car Park R/O Bellamy Court, Broomfield Road	Chelmsford Urban Area	10 homes	In Adopted Local Plan	4
1v	Railway Sidings, Brook Street	Chelmsford Urban Area	Business or industrial use	In Adopted Local Plan	4
1w	Meadows Shopping Centre and Meadows Surface Car Park	Chelmsford Urban Area	757 homes	New allocation	4
1y	Land between Hoffmans Way and Brook Street (Marriage's Mill)	Chelmsford Urban Area	100 homes	New allocation	4
1z	Granary Car Park, Victoria Road	Chelmsford Urban Area	50 homes	New allocation	4
1aa	Coval Lane Car Park	Chelmsford Urban Area	40 homes	New allocation	4
1bb	Glebe Road Car Park	Chelmsford Urban Area	12 homes	New allocation	4

Site No.	Site name	Location	Proposed development	Site Status	Policies Map No.
1cc	Andrews Place, Land West of Rainsford Lane	Chelmsford Urban Area	250 new affordable homes (183 net new affordable homes)	New allocation	4
2	West Chelmsford	Writtle Parish	880 homes, 5 Travelling Showpeople plots	In Adopted Local Plan	3
3a	East of Chelmsford – Manor Farm	Great Baddow Parish	360 homes	In Adopted Local Plan	3
3b	East of Chelmsford – Land North of Maldon Road (Employment)	Sandon Parish	5,000sqm employment floorspace	In Adopted Local Plan	3
3c	East of Chelmsford – Land South of Maldon Road	Sandon Parish	109 homes	In Adopted Local Plan	3
3d	East of Chelmsford – Land North of Maldon Road (Residential)	Sandon Parish	65 homes	In Adopted Local Plan	3
4	Land North of Galleywood Reservoir	Galleywood Parish	24 homes	In Adopted Local Plan	16
5	Land Surrounding Telephone Exchange, Ongar Road	Writtle Parish	25 homes	In Adopted Local Plan	37
6	North East Chelmsford (Chelmsford Garden Community)	Chelmsford Garden Community Parish	5,569 homes, around 56,946sqm of employment land and Gypsy and Traveller site for 10 serviced pitches. Site is able to provide a further 681 homes beyond 2041	In Adopted Local Plan	3
7a	Great Leighs - Land at Moulsham Hall	Great and Little Leighs Parish	750 homes, 5 Travelling Showpeople plots	In Adopted Local Plan	18
7b	Great Leighs – Land East of London Road	Great and Little Leighs Parish	250 homes including specialist residential homes for older persons	In Adopted Local Plan	18

Site No.	Site name	Location	Proposed development	Site Status	Policies Map No.
7c	Great Leighs – Land North and South of Banters Lane	Great and Little Leighs Parish	100 homes	In Adopted Local Plan	18
8	North of Broomfield	Broomfield/Little Waltham Parish	512 homes	In Adopted Local Plan	10
9a	Waltham Road Employment Area	Boreham Parish	Expansion of existing employment area for 3,500sqm of employment floorspace	New allocation	9
10	North of South Woodham Ferrers	South Woodham Ferrers Parish	1,220 homes, 1,200 sqm business floorspace and 5 Travelling Showpeople plots	In Adopted Local Plan	5
11b	Land at Kingsgate, Bicknacre Road	Woodham Ferrers and Bicknacre Parish	20 homes on a site of up to 1ha	New allocation	8
11c	Land West of Barbrook Way	Woodham Ferrers and Bicknacre Parish	20 homes on a site of up to 1ha	New allocation	8
12	St Giles, Moor Hall Lane	Woodham Ferrers and Bicknacre Parish	32 units of specialist residential accommodation	In Adopted Local Plan	8
13	Danbury	Danbury Parish	100 homes to be allocated through the Danbury Neighbourhood Plan: DNP1-A Land at Sandpit Field, East of Little Fields DNP1-B Land at Tyndales Farm West DNP1-C Ex Play Area, South of Jubilee Rise DNP1-D Danecroft, Woodhill Road DNP1-E Land at Mayes Lane	In Adopted Local Plan	12
14b	Land South of Ford End Primary School	Great Waltham Parish	20 homes on a site of up to 1ha	New allocation	15

Site No.	Site name	Location	Proposed development	Site Status	Policies Map No.
15	Little Boyton Hall Farm Employment Area	Roxwell Parish	Expansion of existing employment area for 6,000sqm of employment floorspace	New allocation	3
16a	East Chelmsford Garden Community (Hammonds Farm)	Boreham, Chelmer Village, Danbury, Little Baddow and Sandon Parishes	3,000 homes, 43,000sqm employment floorspace, two Gypsy and Traveller sites with 10 serviced pitches each and 13 Travelling Showpeople plots. Site is able to provide a further 1,500 homes beyond 2041	New allocation	3
16b	Land adjacent to A12 Junction 18 Employment Area	Sandon Parish	43,000sqm employment floorspace	New allocation	3
17a	Land North of Abbey Fields	East Hanningfield Parish	11 homes on a site of up to 1ha	New allocation	13
17b	Land East of Highfields Mead	East Hanningfield Parish	20 homes on a site of up to 1ha	New allocation	13

Highlighted text = Proposed new development allocations in the review of the Local Plan.

Part D – Pre-Submission Local Plan advert for use in Parish/Town Council newsletters/publications

See attached PDF.

Planning Policy Team, February 2025
Chelmsford City Council
01245 606330
planning.policy@chelmsford.gov.uk

Review of the Chelmsford Local Plan - **How to get involved**

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

We need to review the plan at least every five years to ensure that it remains up to date and continues to meet our needs for development growth to 2041.

We have undertaken two previous stages of consultation in 2022 and 2024 and have carefully considered all the responses alongside updated evidence, national planning policy, new local priorities, and monitoring data to progress to the Pre-Submission stage.

This is the third round of public consultation on the final draft Local Plan before we submit it for examination by a Government-appointed independent Planning Inspector. This consultation is a bit different to the previous stages.

The Government asks you to consider whether the Pre-Submission (Regulation 19) Local Plan is legally compliant and consistent with national policy, known as the 'Tests of Soundness'.

The Pre-Submission document includes:

- Strategic Priorities
- Sites where new homes, jobs and other facilities could be located
- Policies that the Council would use to decide planning applications.

We are consulting on the Pre-Submission Local Plan and its accompanying Integrated Impact Assessment from 10am on Tuesday 4 February 2025 until 4pm on Tuesday 18 March 2025.

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

What is the pre-submission (Regulation 19) consultation?

We are reviewing our adopted Local Plan.

We adopted our current plan in May 2020. This is available at www.chelmsford.gov.uk/adopted-plan and it guides growth and development across Chelmsford City Council's area to 2036. We need to review the plan at least every five years, to see if we need to update it. We need to consider new national policy and changing local circumstances, and make sure we meet the needs of our current and future residents. The review will mean that the Local Plan will now run until 2041.

Why do we have to review the adopted Local Plan?

We adopted our current Local Plan in May 2020 and good progress is being made with implementing it. Government requirements mean we must provide more homes, so we need to review the plan at least every five years to ensure that it remains up to date and continues to meet our needs for development growth to 2041.

The Government is clear that housing growth is fundamental to revitalising the economy and the thrust of national planning guidance (NPPF) is to 'boost significantly the supply of housing'. The need for housing is not just a national issue, but a local one too.

Without an up-to-date Local Plan, the Council could have very little influence over the location of new development and the provision of infrastructure. Sites could be promoted for development in locations that the Council and its communities want to protect, and which are not considered sustainable. Not having an up-to-date Local Plan would create uncertainty and make it harder to secure appropriate sites for new infrastructure such as schools and health facilities.

What Stage is the Local Plan at?

- **Issues and Options – Previous stage**
  This was the first stage of consultation which took place in August to October 2022.

- **Preferred Options – Previous stage**
  This was the second stage of consultation which took place in May to June 2024.

  Many people and organisations commented on the Issues and Options and Preferred Options consultations. All representations have been carefully considered alongside updated evidence, national planning policy, new local priorities, and monitoring data. We have published all the comments on our consultation portal.

- **Pre-Submission (Regulation 19) – Current stage**
  This is the third round of public consultation on the final draft Local Plan before we submit it for examination by a government-appointed independent Planning Inspector. The consultation focuses on legal compliance and consistency with national planning policy and runs for a period of six weeks from 10am on Tuesday 4 February 2024 to 4pm on Tuesday 18 March 2025.

- **Submission – Future stage**
  This is the formal Submission of the Local Plan. All Plan documents, evidence, and all comments received at Pre-Submission stage are submitted to the Planning Inspector for an Independent Examination.

What does the Pre-Submission (Regulation 19) Local Plan cover?

The Pre-Submission (Regulation 19) Local Plan includes:

- Updated and new Strategic Priorities and Policies
- Updated plan Vision
- Numbers for future development requirements, including homes and jobs
- A strategy for locating additional future growth to 2041 including new and updated site allocations
- Updated Draft Policies Map.

How has the plan changed since the Preferred Options Local Plan consultation?

Numerous changes have been made from the Preferred Options Local Plan to the Pre-Submission (Regulation 19) Local Plan. Some of the plan changes relate to suggestions arising in the preferred options consultation responses. Others address recent evidence base work, respond to new information or have been made for clarification and consistency. Most changes made are considered relatively minor in nature and as such the Pre-Submission (Regulation 19) Local Plan essentially remains substantially the same in principle to the Preferred Options Consultation Document.

Policies are shown in the order they appear logically in the plan and will be renumbered in the final version**.**

How much development is proposed and where in the Pre-Submission (Regulation 19) Local Plan?

The Pre-Submission (Regulation 19) Local Plan follows the approach in the Preferred Options Local Plan by continuing to focus new housing and employment growth to the most sustainable locations in three Growth Areas - 1 Central and Urban Chelmsford, 2 North Chelmsford and 3 South and East Chelmsford.

The existing site allocations in the adopted plan (May 2020) which are not yet built are carried forward in the Pre-Submission (Regulation 19) Local Plan. Many of these sites are now coming forward, with masterplans being approved and planning applications decided or in progress. Some sites have also started building.

We have calculated that our annual housing requirement is 1,210 homes per year from 2022, when we started reviewing the Local Plan, until 2041. This equates to 22,990 homes.

To meet additional housing growth needs to 2041 we have allocated new sites for around 4,233 new homes. Provision is also made for a further 2,181 new homes beyond 2041. The Pre-Submission (Regulation 19) Local Plan also plans to meet future employment needs by providing additional employment allocations for around 107,500sqm. These figures have been informed by updated evidence base and data, including the Strategic Housing Needs Assessment Addendum (2024) and Employment Land Review – Focused Update (2024).

We are not considering growth in the Green Belt or Green Wedge.

How have we used the previous Preferred Options consultation comments?

The Council undertook a second round of public consultation on a Preferred Options document in May to June 2024. All the responses have been carefully considered and used to progress the Pre-Submission (Regulation 19) Local Plan alongside an updated plan evidence base, national planning policy, new local priorities, and monitoring data.

The ‘You Said We Did’ feedback report provides a summary of how the Pre-Submission (Regulation 19) Local Plan has been informed by the Preferred Options consultation responses. It also summarises the representation received, the main issues raised and provides a summary of how the Preferred Options Local Plan has been informed by the representations and the evidence base. The ‘You Said We Did’ is available at www.chelmsford.gov.uk/lp-review.

Is Hammonds Farm still a site allocation in the Pre-Submission (Regulation 19) Local Plan?

Yes, Hammonds Farm (SGS16a) and Junction 18 A12 Employment Area (SGS16b) remain site allocations in the plan. However, the site allocation policies have been refined and strengthened, where appropriate, to help address community and stakeholder concerns raised and any suggestions made for their improvement. This includes changes

to the Draft Policy Map to allocate land within the site to ensure important landscape and heritage features are protected.

The Council acknowledges that significant levels of opposition were received to these sites during the Preferred Options Local Plan consultation. However, it is important to note that the Council makes decisions on evidence and sound planning judgments, rather than solely basing them on the number of objections made.

What is the Integrated Impact Assessment?

The Integrated Impact Assessment (or IIA for short) assesses the Pre-Submission (Regulation 19) Local Plan against a range of social, environmental and economic indicators and helps to identify all the likely significant effects. The IIA advises on ways in which any adverse effects could be avoided, reduced or mitigated or how any positive effects could be maximised. This helps to ensure that the policies, plans and allocations in the Local Plan are promoting sustainable development. We are consulting on this at the same time as the Pre-Submission (Regulation 19) Local Plan.

When is the pre-submission (Regulation 19) consultation?

The Pre-Submission (Regulation 19) Local Plan and accompanying Integrated Impact Assessment (IIA for short) are published for six weeks consultation from 10am on 4th February 2025 before the plan is submitted for examination by a government-appointed independent Planning Inspector.

Who can take part in the pre-submission (Regulation 19) consultation?

Anyone with an interest in Chelmsford can take part in the consultation.

How can I take part in the pre-submission (Regulation 19) consultation?

The consultation is a different to the previous stages. The Government asks you to consider whether the Pre-Submission Local Plan is legally compliant and consistent with national policy, known as the 'Tests of Soundness'. There are specific consultation questions based on a suggested model representation form by the Planning Inspector.

Where can I view the pre-submission (Regulation 19) consultation documents?

You can read the consultation documents in the following ways:

- On the Council's Consultation Portal at www.chelmsford.gov.uk/planningpolicyconsult. This system also allows you to submit comments to the consultations
- On the Council's website alongside the Local Plan evidence base documents at www.chelmsford.gov.uk/lp-review
- At the Chelmsford City Council Customer Service Centre, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford CM1 1JE (10am to 4pm Monday to Friday).

At some staffed drop-in public exhibitions – see later FAQs for details.

How can I comment on the pre-submission (Regulation 19) consultation documents?

You can comment on the consultation documents in the following ways:

Online Consultation Portal:
Go to: www.chelmsford.gov.uk/planningpolicyconsult where you can:

- Read the consultation documents
- Make your comments via the specially designed representation form
- Sign up for alerts to feedback reports and future consultations

This is our preferred means of receiving comments as it ensures that your comments are recorded accurately and are processed quickly. If you have not used this system before or have any difficulties logging in, please see our guidance notes at:www.chelmsford.gov.uk/lp-portal-guide or call us on (01245) 606330.

In writing:
If you prefer to send comments in writing, please fill in the relevant specially designed representation forms for each consultation event.

Local Plan representation forms cover the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document and the Review of the Adopted Chelmsford Local Plan: Pre-Submission Integrated Impact Assessment consultations.

The Local Plan representation forms can be downloaded at www.chelmsford.gov.uk/lp-review. Paper copies of these representation forms for are also available from Chelmsford City Council's Customer Service Centre (details above) or on request by telephoning (01245) 606330 or emailing planning.policy@chelmsford.gov.uk

Forms can be returned:

- By e-mail to planning.policy@chelmsford.gov.uk
- By post to Planning Policy, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE
- By hand to Chelmsford City Council Customer Service Centre (details above).

The use of the Local Plan representation forms is strongly recommended as this will ensure that comments are related to the matters relevant to the subsequent Independent Examination by a Planning Inspector. If you do not have access to a computer, you can request paper copies. A charge will be made to cover printing and postage costs. If you have difficulties making representations by e-mail or post due to a disability, please call us (01245) 606330.

Any late comments received after 4pm on 18 March 2025 cannot be accepted and individual acknowledgement of receipt will not be possible.

What is 'legal compliance'?

Local Plans are legally compliant if they are:

- prepared in accordance with the Council's latest Local Development Scheme
- accompanied by a Sustainability Appraisal and Habitats Regulations Assessment

- subject to consultation carried out in accordance with the Council's Statement of Community Involvement
- compliant with all relevant laws including the Planning and Compulsory Purchase Act (PCPA) and the Town and Country Planning (Local Planning) (England) Regulations 2012; and
- prepared in line with the Duty to Co-operate.

Please read the Statement of Representation Procedure and Statement on Availability for full details about how to make your comments available at www.chelmsford.gov.uk/lp-review.

What is 'soundness'?

Local Plans are considered sound if they are:

- **Positively prepared** – provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common grounds; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

Please read the Statement of Representation Procedure and Statement on Availability for full details about how to make your comments available at www.chelmsford.gov.uk/lp-review.

What is the 'duty to cooperate'?

The Council has a legal duty to cooperate with other national and local bodies, such as neighbouring planning authorities, Essex County Council and Historic England. The purpose of the duty is to discuss and address strategic cross-boundary issues such as housing, employment and infrastructure needs.

These discussions have helped to formulate the Pre-Submission Local Plan. The Pre-Submission Duty to Co-operate Position Statement provides evidence of this ongoing engagement and where agreement has been reached. This Statement is also supported by Statements of Common Ground which are being agreed with organisations. These will be available on the Council's website as they are agreed at www.chelmsford.gov.uk/lp-review.

Will previous consultation responses be carried forward?

No, all comments made on previous consultations in 2022 and 2024 have already been considered. A new representation must be submitted if individuals and organisations still have relevant comments to make. The Local Plan examination will also be based around

matters raised by representations made on the Pre-Submission (Regulation 19) Local Plan rather than previous versions.

Where and when are the Local Plan exhibitions?

The Civic Centre drop-in public exhibitions will be staffed and provide an opportunity to meet a planning officer face-to-face. The other exhibitions in High Chelmer and South Woodham Ferrers will not be staffed – see details below. Please check our website www.chelmsford.gov.uk/lp-review for any updates before making your journey.

Location	Date	Time
Council Chamber, Civic Centre, Duke Street, Chelmsford, CM1 1JE	Thursday 27 February Friday 28 February Saturday 1 March	6pm - 8pm 2pm - 4pm 10am - 12noon
High Chelmer Shopping Centre, Exchange Way, Chelmsford, CM1 1XB	Monday 24 February to Sunday 2 March	Unstaffed exhibition panels displayed all-day during shopping centre opening hours
South Woodham Town Council, Champions Manor Hall, Hullbridge Road, South Woodham Ferrers, CM3 5LJ	Thursday 13 February to Tuesday 25 February	Unstaffed exhibition panels displayed 9am - 4pm (except weekends)

You can also view the exhibition online at www.chelmsford.gov.uk/lp-review.

What is the evidence base?

National policy requires the Council to ensure that its Local Plan is based on appropriate up-to-date evidence about economic, social and environmental characteristics and prospects of Chelmsford. The evidence base comprises studies and working with key stakeholders and groups across the City area. More recently completed evidence base used to inform the Pre-Submission Local Plan include:

- Updated Viability Assessment
- Updated Infrastructure Delivery Plan
- Updated Heritage Impact Assessment
- New Strategic Housing and Employment Land Availability Assessment (SHELAA)
- Strategic Housing Needs Assessment Addendum Report
- Employment Land Availability Assessment Focused Review
- New Open Space Assessment
- New Archaeology Assessment
- New Air Quality Assessment
- Level 2 Strategic Flood Risk Assessment – updated and new site summary tables and maps
- Sequential and Exception Testing Focused Update, and
- Local Neighbourhood Centre Technical Note.

These evidence base documents are available online via www.chelmsford.gov.uk/lp-review. There are also evidence base documents which were used to support the adopted Local Plan which are still relevant. These evidence base documents are available to view at: https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-local-plan/adopted-local-plan/evidence-base/

Information on how the Pre-Submission (Regulation 19) Local Plan has been informed by the updated plan evidence is set out in a Preferred Options 'You Said We Did' Feedback Report also available at www.chelmsford.gov.uk/lp-review.

What weight does the Pre-Submission (Regulation 19) Local Plan have in decision making?

The Pre-Submission (Regulation 19) Local Plan indicates the Council's intent to address future growth requirements in Chelmsford in the period to 2041 and beyond in a planned and sustainable way. However, at this stage it will be of limited weight in decision making on planning applications,

It will not have full Development Plan status until it has been adopted by the Council. At this point the new Plan would also replace the current adopted plan.

What happens after the Pre-submission (Regulation 19) Local Plan consultation?

All duly-made responses will be submitted to the Planning Inspector, alongside the Pre-Submission (Regulation 19) Local Plan and evidence base. The Council will produce a summary of the main issues raised in the consultation responses for the Planning Inspector and publish this online.

All duly-made comments will be published on the Council's Consultation Portal in accordance with the General Data Protection Regulations. To be duly made, you need to provide your name and address with your comment. Anonymous comments will not be accepted. Your name, your comments and any information provided, including supporting documents, will be available for public inspection and published online. We will not publish any personal details.

Section 149 of the Equality Act 2010 requires that the Council should avoid any form of discrimination and also foster good relations between different ethnic groups. We will not display, share or consider any comments that are inappropriate, including those that are racist, inflammatory or derogatory. Any such comments will be considered as inadmissible and will not be accepted.

The Council will acknowledge receipt of all duly-made comments although it will not enter into individual correspondence.

How can I be kept up to date on progress?

We have a specially designed consultation portal for Local Plan and other planning policy consultations. If you register, you can:

- read and save consultation documents
- make your comments online
- receive alerts on future consultations

You can find out more about how to use the consultation portal online at www.chelmsford.gov.uk/lp-portal-guide

You can also sign up to the Chelmsford City Life mailing list, to receive news updates.

What are the Planning Advice Note and Supplementary Planning Document consultations?

We are also consulting on a Co-Living Housing Planning Advice Note and Draft Planning Obligations Supplementary Planning Document (SPD) from 10am on 4 February to 4pm on 18 March 2025.

The Planning Advice Note seeks to provide practical guidance to potential promoters or developers of co-living housing in Chelmsford, to ensure they meet the Council's expectation in this regard.

The Consultation Draft Planning Obligations Supplementary Planning Document (SPD) is also being consulted on. This sets out how the Council will seek planning obligations when considering planning applications. The adopted SPD was published in January 2021 and has been updated to reflect proposed changes in the Chelmsford Local Plan – Pre-Submission (Regulation 19) Document, as well as changes in national planning policy. It refers to the latest published Infrastructure Delivery Plan and integrates and updates some published Planning Advice Notes.

You can view and comment on the Planning Advice Note and SPD on the consultation portal at www.chelmsford.gov.uk/planningpolicyconsult:

4. Co-Living Housing Planning Advice Note Consultation - click on this event to view and comment

5. Consultation Draft Planning Obligations Supplementary Planning Document - click on this event to view and comment

Planning Policy Team, 4 February 2025
Spatial Planning Services
January 2025
01245 606330
planning.policy@chelmsford.gov.uk



Pre-Submission Local Plan consultation

Comms & Marketing Campaign

February/March 2025

Chelmsford City Council

Pre-submission Local Plan consultation

Print Ads - Magazines

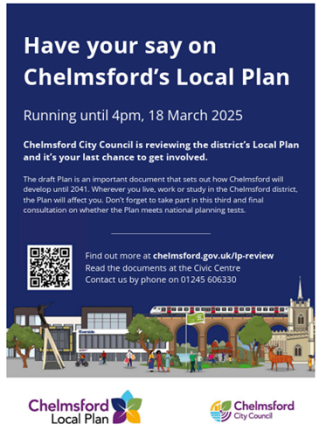
Publication	Details	Issue date	Circulation
City Times www.thecitytimes.co.uk	A4 full colour 32pp	14 Feb – 15 March	**Monthly, 10K.** • **Nearest Thursday to 15th each month.** • Available to pick up in many outlets across Chelmsford, Maldon, South Woodham Ferrers, Ongar and Ingatestone.
South Woodham Focus https://focuspp.com/the-focus-south-woodham-edition/	A4 full colour 24pp	2 March 2025	**Monthly, 6.5K** • Available to pick up at 16 different collection points across South Woodham Ferrers

Chelmsford City Council

Pre-submission Local Plan consultation

Print Ads - Magazines





https://www.chelmsfordthecitytimes.co.uk/

The City Times (free magazine)

Advert on page 13 for issue number 136
(14 Feb – 15 March 2025)





https://focus-magazine.co.uk/

South Woodham Focus (free magazine)

Advert on page 23 for issue March 2025
(March 2025)

Chelmsford City Council

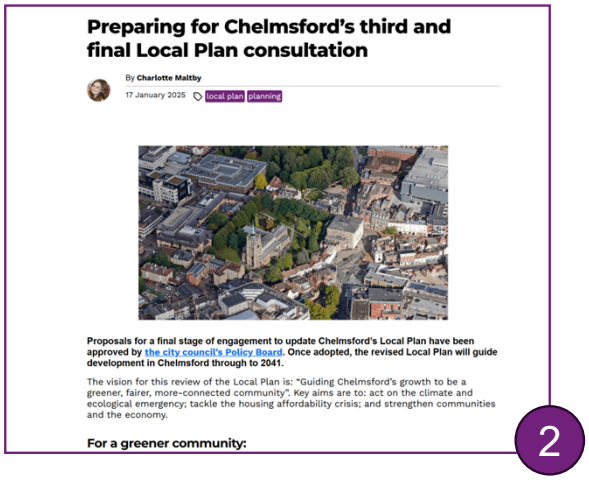
Pre-Submission Local Plan consultation

City Life website

	Title	Date	URL	Visits	Page Views	Unique visitors
1	Have your say on Chelmsford's development to 2041	4/2/2025	https://citylife.chelmsford.gov.uk/posts/have-your-say-on-chelmsford-s-development-to-2041	827	899	706
2	Preparing for Chelmsford's third and final Local Plan consultation	17/2/2025	https://citylife.chelmsford.gov.uk/posts/preparing-for-chelmsford-s-third-and-final-local-plan-consultation	967	1,036	875
3	Local Plan exhibitions begin	14/2/2025				



1



2



3

Pre-Submission Local Plan consultation
Meta paid ad #1 10 – 17 Feb

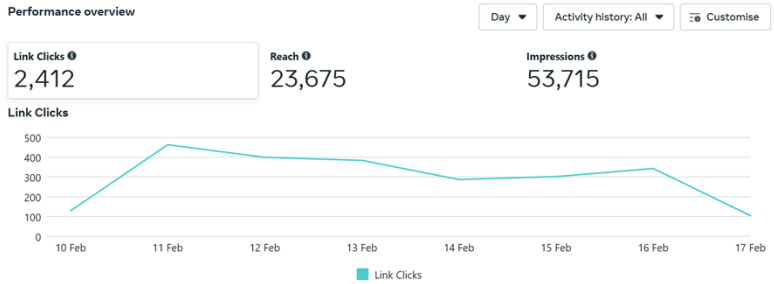
Account stats	March 2025
Followers	12.2K

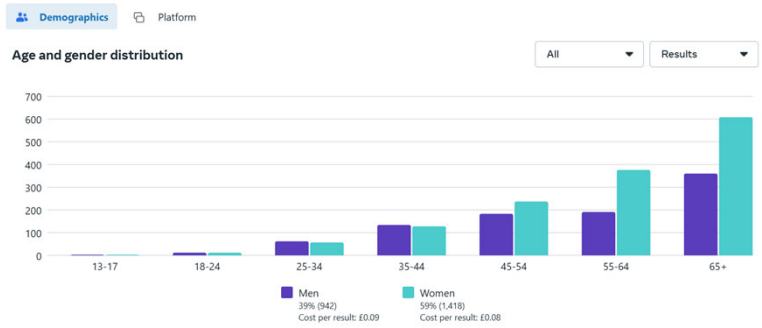
@chelmscouncil

Engagement stats	
Post comments	11
Post reactions	35

Stats 10 – 17 Feb 2025	
Total reach	**23,675**
Impressions	53,715
Link clicks	2,412
CTR	7.93%







- **Reach**: The number of users who've seen your content.
- **Impressions**: The total number of times your ad has been seen.
- **Clicks**: The number of times users have clicked on your ad.
- **Engagement/interactions**: The collective number of likes, comments, and shares your ad has received.
- **Click-Through Rate**: The percentage of users who clicked on your ad after seeing it.

Chelmsford City Council

Pre-Submission Local Plan consultation

Meta paid ad #2 10 – 18 March

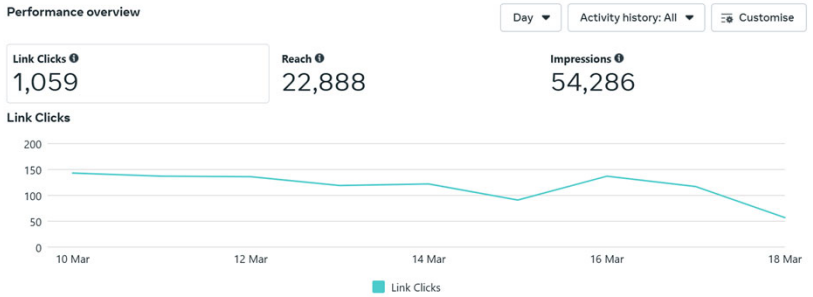
Account stats	March 2025
Followers	12.2K

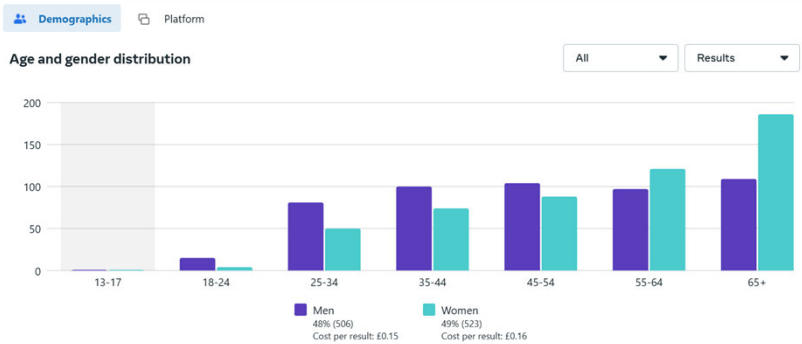
@chelmscouncil

Account stats	[date]
Post comments	49
Post reactions	29

Stats 10 – 18 March 2025	
Total reach	**22,888**
Impressions	54,286
Link clicks	2,537
CTR	4.67%



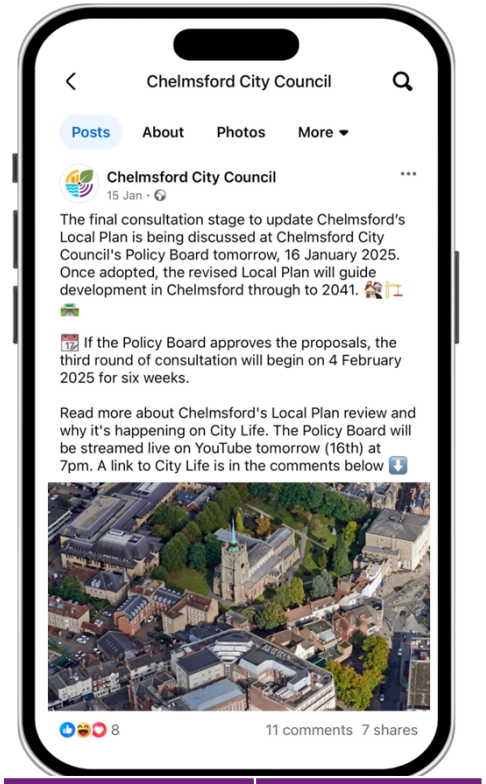




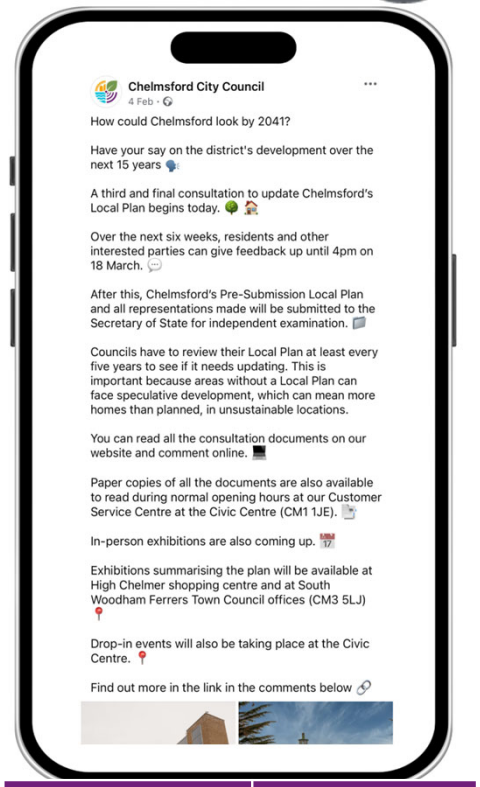
- **Reach**: The number of users who've seen your content.
- **Impressions**: The total number of times your ad has been seen.
- **Clicks**: The number of times users have clicked on your ad.
- **Engagement/interactions**: The collective number of likes, comments, and shares your ad has received.
- **Click-Through Rate**: The percentage of users who clicked on your ad after seeing it.

Chelmsford City Council

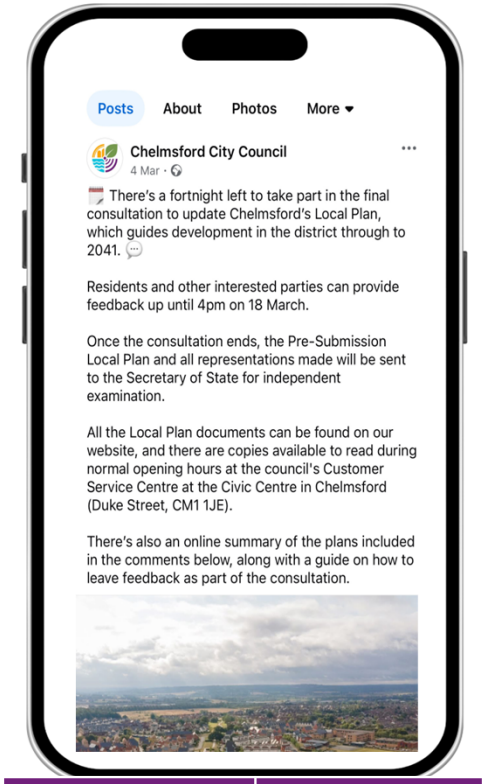
Pre-Submission Local Plan consultation
Facebook organic posts @chelmscouncil



Key post stats	15 Jan 2025
Total reach	**2,518**
• Reactions	16
• Comments	15
• Shares	7
• Clicks	280



Key post stats	4 Feb 2025
Total reach	**5,656**
• Reactions	32
• Comments	18
• Shares	16
• Clicks	1,341



Key post stats	4 March 2025
Total reach	**3,019**
• Reactions	10
• Comments	57
• Shares	6
• Clicks	366

- **Reach**: The numbe**r of users who've seen your content.**
- **Impressions**: The total number of times your ad has been seen.
- **Clicks**: Includes clicks on photos and links.
- **Engagement/interactions**: The collective number of likes, comments, and shares your ad has received.

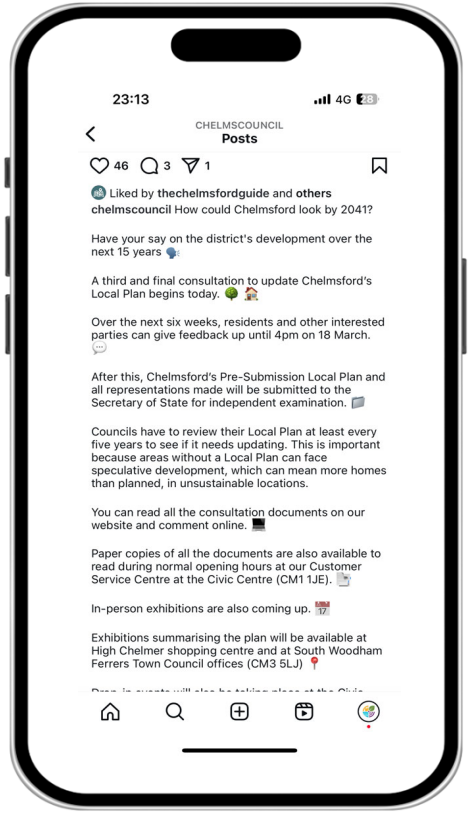
Account stats	March 2025
Followers	**12.2K**

Chelmsford City Council

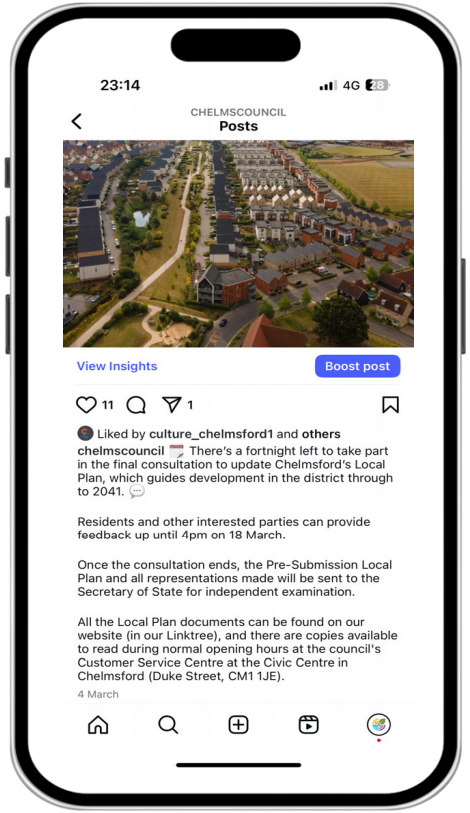
Pre-Submission Local Plan consultation
Instagram organic posts
@chelmscouncil

- **Reach**: The number **of users who've seen your content.**
- **Likes**: The total number of likes your post has received.
- **Comments**: The number of comments people have made on your post.
- **Saves**: the number of accounts that have saved your post.

Account stats	March 2025
Followers	3.3K



Key post stats	4 Feb 2025
Total reach	1,049
• Likes	46
• Comments	3
• Saves	4



Key post stats	4 Mar 2025
Total reach	728
• Likes	11
• Comments	0
• Saves	2

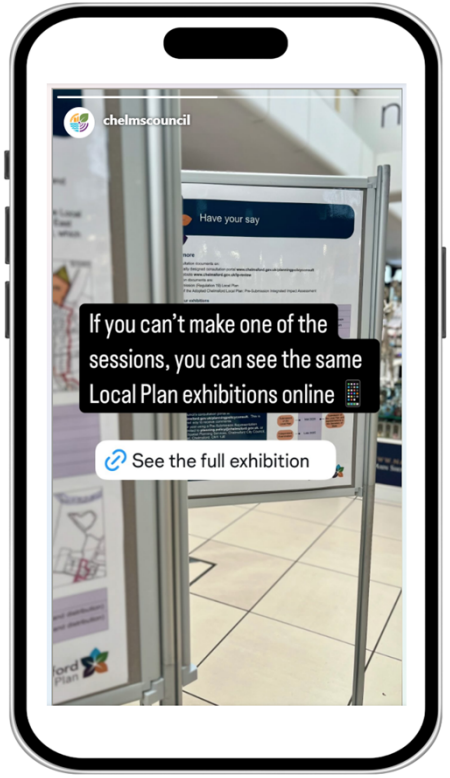
Chelmsford City Council

Pre-Submission Local Plan consultation
Facebook/Instagram stories
27 Feb 2025







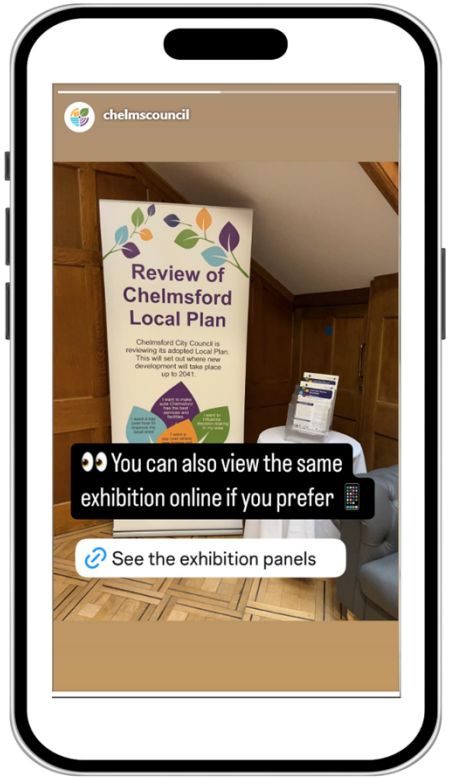


Chelmsford City Council

Pre-Submission Local Plan consultation
Facebook/Instagram stories



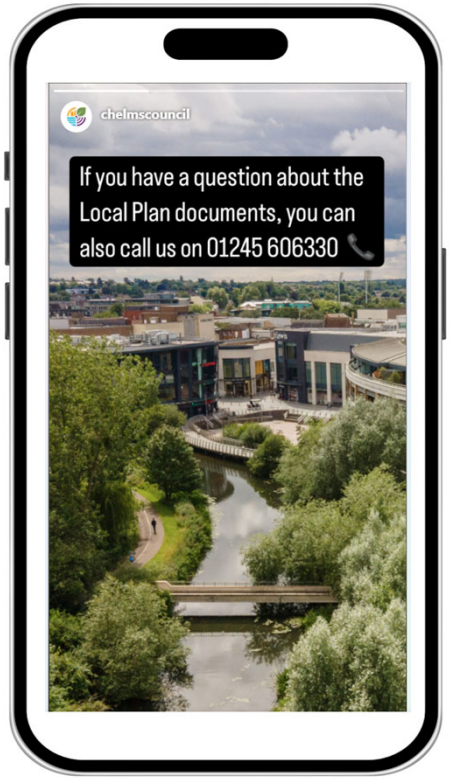
28 Feb 2025



28 Feb 2025



17 Mar 2025

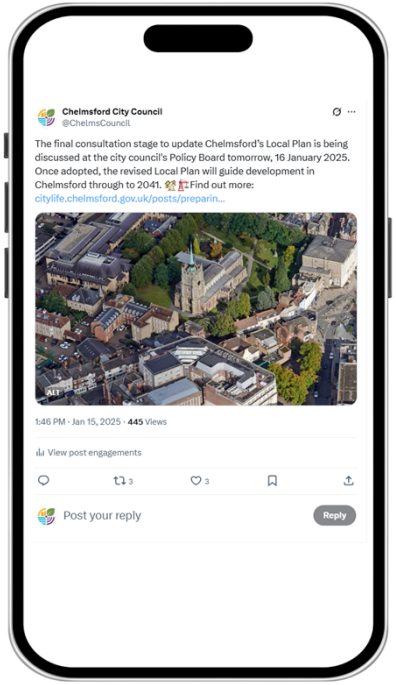


17 Mar 2025

Chelmsford City Council

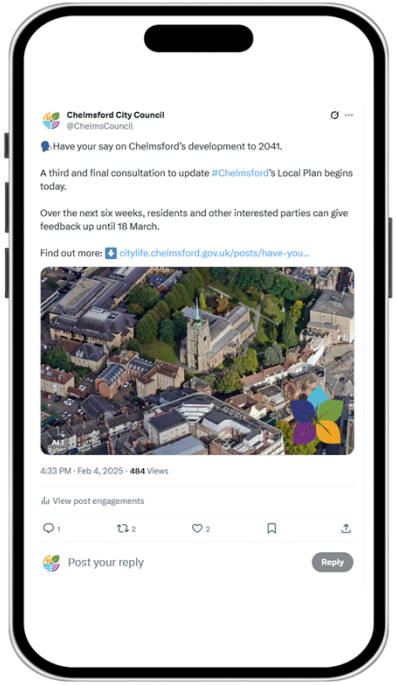
Pre-Submission Local Plan consultation
X (Twitter) organic posts
@chelmscouncil

Account stats	
Followers	17.6K



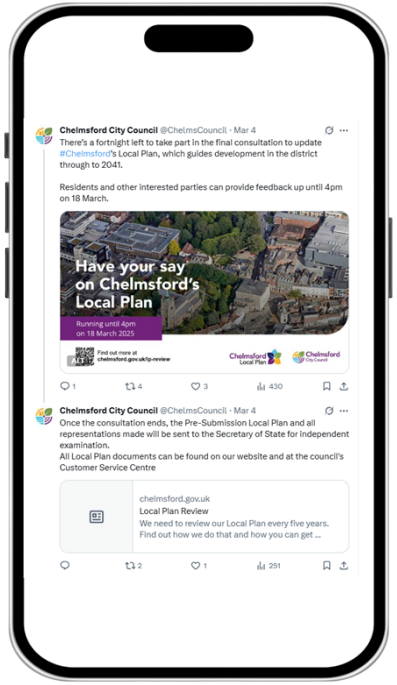
15 Jan 2025

- 446 impressions
- 33 engagements
- 17 link clicks



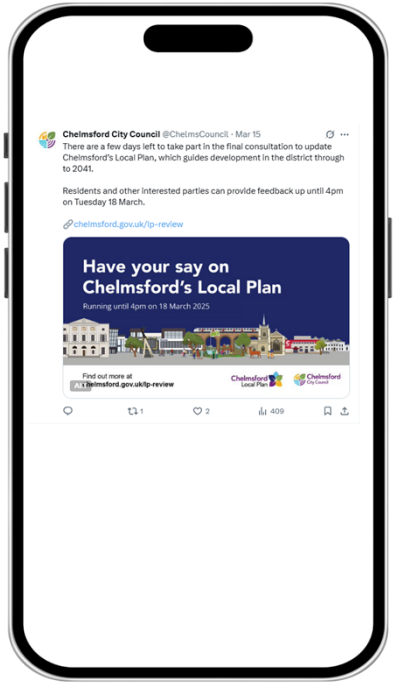
4 Feb 2025

- 485 impressions
- 38 engagements
- 21 link clicks



4 March 2025

- 432 impressions
- 15 engagements
- 0 link clicks



15 March 2025

- 410 impressions
- 10 engagements
- 4 link clicks



17 March 2025

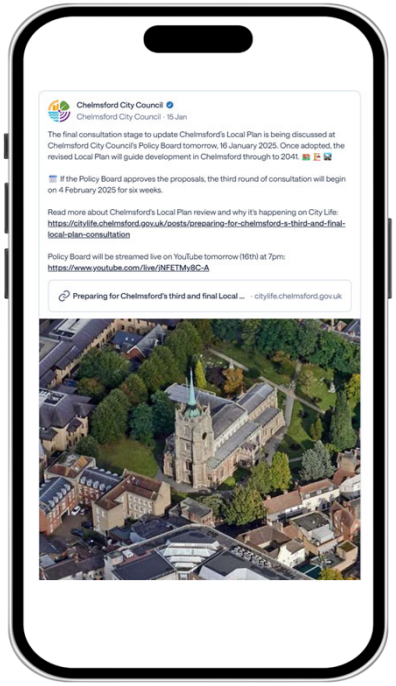
- 457 impressions
- 15 engagements
- 6 link clicks

Chelmsford City Council

Pre-Submission Local Plan consultation
Nextdoor organic posts
Chelmsford City Council

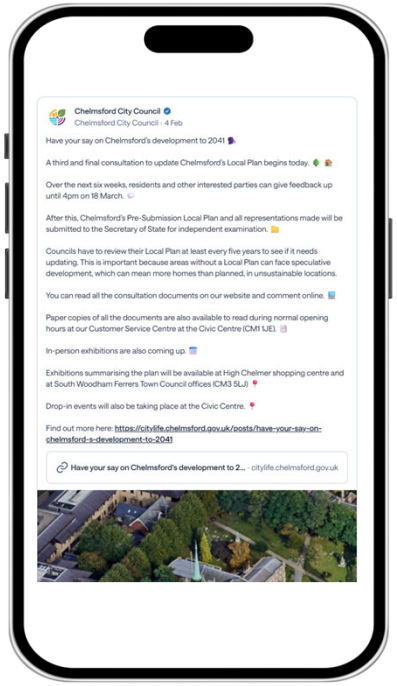
Account Stats
- **Members:** 35,784 and **Claimed households:** 26,913 (households with at least one confirmed member)

Campaign Stats
- **Impression Count:** Number of views for our post
- **Thank Count:** Number of reactions (like, heart, etc.) on our post
- **Reply Count:** Number of comments on the post



15 Jan 2025

- 3,504 impressions
- 7 engagements
- (1 thank you, 6 replies)



4 Feb 2025

- 1,944 impressions
- 1 engagement
- (1 thank you)



27 Feb 2025

- 1,226 impressions
- 2 engagements
- (2 replies)



11 March 2025

- 1,715 impressions
- 2 engagements
- (2 replies)



18 March 2025

- 1,414 impressions
- 1 engagements
- (1 reply)

Chelmsford City Council

Pre-Submission Local Plan consultation

Email campaigns



e-shot

	Email	Date	Sent to	Displays/opens	Relevant link clicks
1	**City Life** Item: Local Plan consultation to start next month (lead story)	17 Jan 2025	10,629	47.67%	278 for item https://news.comms.chelmsford.gov.uk/p7e5/Design/x4-8m85
2	**City Life** Item: Have your say on Chelmsford's development to 2041 (lead story)	7 Feb 2025	10,635	55.72%	191 for item https://news.comms.chelmsford.gov.uk/p7e5/Design/3o-9h45
3	**City Life** Item: Local Plan exhibitions begin	14 Feb 2025	10,639	47.16%	53 for item https://news.comms.chelmsford.gov.uk/p7e5/Design/iz-i472
4	**Local Plan special** Have your say on Chelmsford's Local Plan	18 Feb 2025	10,641	55.24%	236 for bulletin (4.37% of opens) https://news.comms.chelmsford.gov.uk/p7e5/Design/ic-7xh1

Average rates for Local Authorities on e-shot

- Displays/opens = 40.6%

Chelmsford City Council

Pre-Submission Local Plan consultation

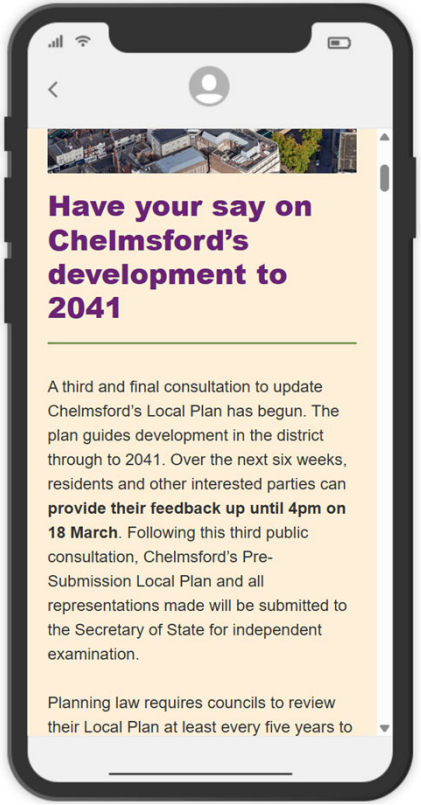
Email campaigns

e-shot

1



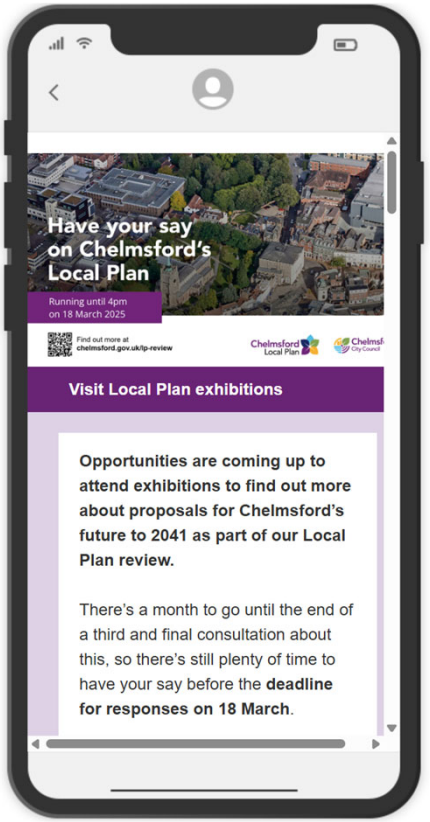
2



3



4



Chelmsford City Council

Pre-submission Local Plan consultation

Email campaigns



e-shot

	Email	Date	Sent to	Displays/opens	Relevant link clicks
5	**City Life** Item: Chelmsford's Local Plan exhibitions continue	21 Feb 2025	10,641	55.31%	35 for item https://news.comms.chelmsford.gov.uk/p7e5/Design/04-bc25
6	**Invest Chelmsford Business** Local Plan bulletin	4 March 2025	5,153	45.94%	69 https://news.comms.chelmsford.gov.uk/p7e5/Design/q8-ce7c5
7	**City Life** Item: Chelmsford's Local Plan consultation	8 March 2025	10,656	50.66%	72 for item https://news.comms.chelmsford.gov.uk/p7e5/Design/q7-pm6
8	**City Life** Item: Reminder: Local Plan consultation closes soon	14 March 2025	10,679	54.53%	63 for item https://news.comms.chelmsford.gov.uk/p7e5/Design/a7-4p82

Average rates for Local Authorities on e-shot

- Displays/opens = 40.6%

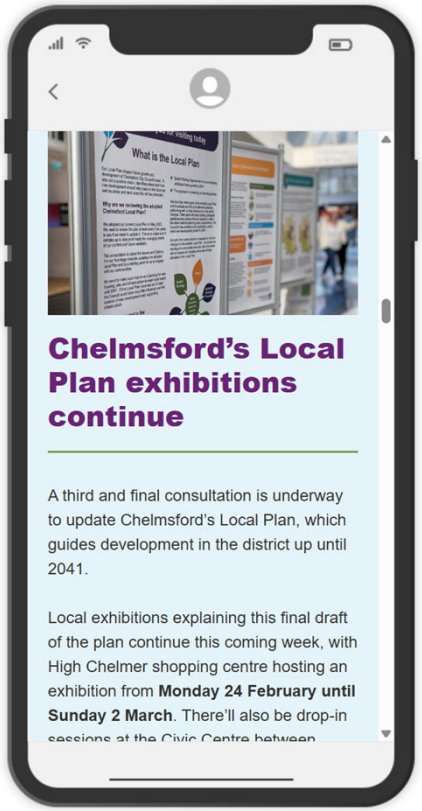
Chelmsford City Council

Pre-Submission Local Plan consultation

Email campaigns

e-shot

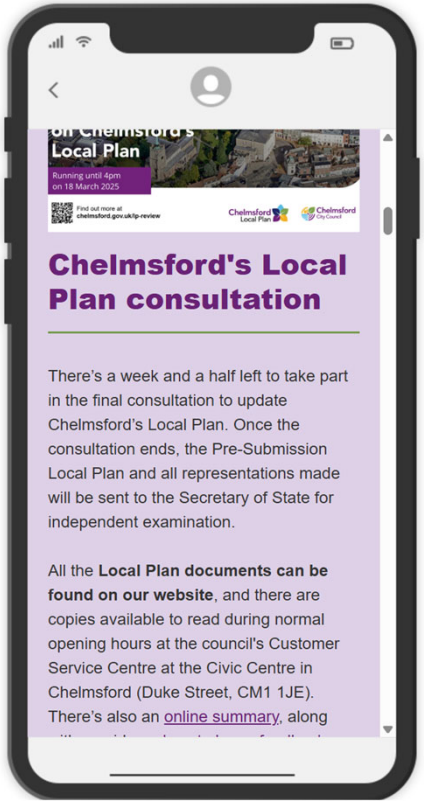
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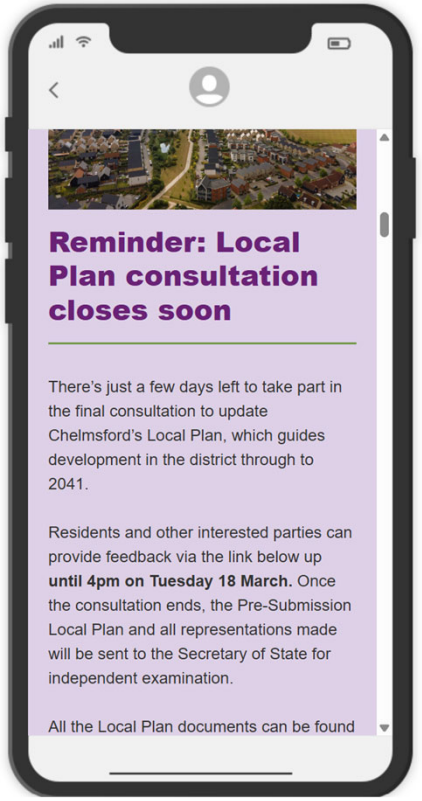
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Chelmsford City Council

Pre-submission Local Plan consultation

Corporate website

Web page date	Description
6 January 2025	Chelmsford Policy Board – alert to meeting date for approval to consult
4 February 2025	Pre-Submission Consultation Launch
18 March 2025	Consultation closing information
2 May 2025	Confirmation of receipt of comments, which are published on the Consultation Portal



We are reviewing our adopted Local Plan. We are currently consulting on the Chelmsford Local Plan: Pre-Submission (Regulation 19) Document.

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Chelmsford Local Plan

Pre-submission consultation stage

How to have your say

You can view the Local Plan review consultation documents on our specially designed Planning Policy consultation portal.

Also in this section

- Adopted Local Plan
- Request housing and planning policy advice
- Brownfield register
- Self-build, custom build and community-led housing

City Council

Pre-submission Local Plan consultation

Press coverage

Publication/title	URL	Date
Essex Live: Where 26,000 homes will be built across Chelmsford including major city centre redevelopment and new Essex village	https://www.essexlive.news/news/essex-news/26000-homes-built-across-chelmsford-9848710	11/01/2025
Yellow Advertiser: Consultation on Chelmsford's 26,000-home development plan set to be launched	https://www.yellowad.co.uk/consultation-on-chelmsfords-26000-home-development-plan-set-to-be-launched/	13/01/2025
Essex Live: Residents to have their say on plan for 23,000 new homes in Chelmsford	https://www.essexlive.news/news/essex-news/residents-say-plan-23000-new-9872022	20/01/2025
Essex Chronicle: Last chance to have your say on plan for area up to 2041	No link available (print only)	20/02/2025
Essex Chronicle: Consultation on Homes Schemes given go-ahead	No link available (print only)	23/01/2025

Chelmsford City Council

Pre-submission Local Plan consultation

Clear Channel Digital Screens

Clear Channel digital screens in Chelmsford (FOC)

These cover a range of bus stops in the city centre



Ads ran from 27/02/2025 until 18/03/2025

- The ads were shown on rotation for the duration of the hours scheduled
- There were 25,613 plays of this ad across 7 screens, including: Parkway (B&M), Parkway Flyover, Waterhouse Lane, Springfield Road, Rainsford Lane, Moulsham Street (Junction with London Road)

Buses cater to people of all ages, professions, and backgrounds, making bus shelters an ideal medium to reach a broad captive target audience. The ads are also visible to passing audience/traffic.

Research suggests that people are more likely to remember ads they've seen on a digital screen compared to static posters or banners.

Chelmsford City Council

Pre-submission Local Plan consultation

Digital screens in CCC venues

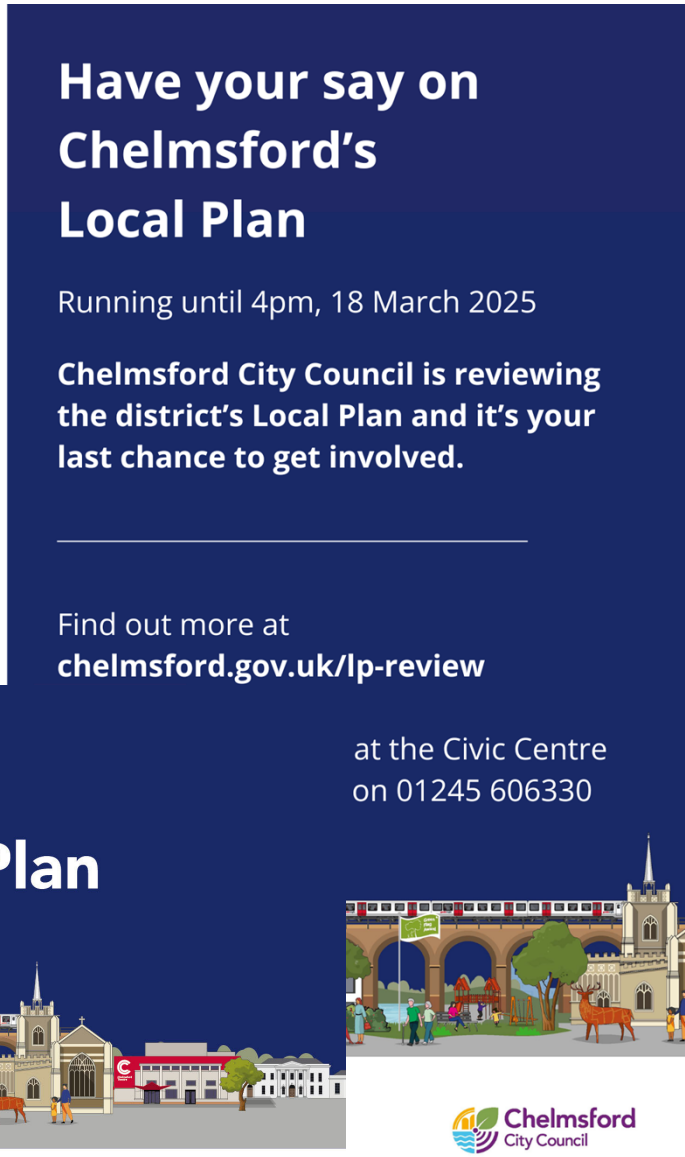
30 x screens on the Brightsign network (FOC)

- 25 screens across 4 leisure centres: over 1.7m attendances p.a.
- 2 screens in Theatre: over 156.5k attendances p.a.
- 1 screen at Museum: 106.4K footfall p.a.
- 2 screens (Sandon & Chelmer Valley) at Park & Ride

Local Plan consultation ads were shown on the following CCC venue screens between 17 Feb – 18 March:

- Riverside Leisure Centre
- South Woodham Ferrers Leisure Centre
- Chelmsford Sport and Athletics Centre
- Dovedale Sports Centre
- Chelmsford Theatre
- Museum of Chelmsford
- Park & Ride screens







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

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Chelmsford Local Plan Review: Pre-Submission (Regulation 19) Local Plan Consultation Document

Integrated Impact Assessment Report – Feedback Report

1. Introduction

1.1 Chelmsford Local Plan Review: Pre-Submission (Regulation 19) Consultation Document

Chelmsford City Council (the Council) is carrying out a review of the Chelmsford Local Plan. Once adopted, the revised Local Plan will replace the Adopted Local Plan (Chelmsford Local Plan 2013-2036)[1], setting out how much new development will be accommodated in the Council's administrative area (the 'City Area') to 2041, along with where this growth will be located. This Local Plan will also establish the policy framework for managing development proposals, containing planning policies which support the proposed vision: *"Guiding Chelmsford's growth towards a greener, fairer and more connected community."*

The Local Plan Pre-Submission (Regulation 19) Document[2] drew on the feedback received as part of the Preferred Options consultation and was consulted on between 4th February and 18th March 2025. This was the third and final stage of public consultation on the final draft Local Plan and was accompanied by the Integrated Impact Assessment (IIA) which is the subject of this report.

Prior to this stage, the feedback received as part of the Issues and Options Consultation was used to prepare the Preferred Options Consultation Document, accompanied by an IIA report[3]. Consultation on the documents took place between 8th May 2024 and 19th June 2024.

The first stage in the review of the Local Plan was the publication of the Chelmsford Local Plan Issues and Options Consultation Document (the 'Issues and Options Consultation Document')[4] that was consulted on between 11th August 2022 and 20th October 2022 and accompanied by an IIA report[5].

The consultation responses made to the Pre-Submission IIA Report (2025) are set out in this report.

[1] https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-local-plan/adopted-local-plan/
[2] Pre Submission Consultation 2025
[3] preferred-options-integrated-impact-assessment.pdf
[4] https://www.chelmsford.gov.uk/media/chehlnlq/issues-and-options-consultation-document.pdf
[5] https://www.chelmsford.gov.uk/media/undd2l1y/chelmsford-local-plan-issues-and-options-iia.pdf

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1.2 The Integrated Impact Assessment Report

The Council is required to carry out a Sustainability Appraisal (SA) of the Local Plan Review[6]. This is a means of ensuring that the likely social, economic and environmental effects of the Local Plan Review are identified, described and appraised and also incorporates a process set out under UK regulations[7] called Strategic Environmental Assessment (SEA). The SEA requires that environmental considerations are embedded into the development of plans and programmes such as local plans. The Local Plan IIA brings together SA and SEA, as well as Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA) within a single document. The HIA and EqIA are bespoke assessments designed to specifically address health and equalities matters in order to meet legislative requirements.

1.3 Habitats Regulations Assessment Report

The Conservation of Habitats and Species Regulations 2017 (as amended) requires local authorities to assess the potential impacts of land use plans on European protected sites to determine whether there will be any likely significant effects as a result of the plan's implementation. This process is known as Habitats Regulations Assessment (HRA), which is also included within the IIA.

1.4 This Feedback Report

This report provides a record of the responses provided to the IIA Report and the HRA Report. Responses to the latter are presented at the end of Table 2.2. The responses will be taken into account by the Council in preparing the Local Plan, IIA and associated HRA for Submission for Examination.

1.5 Conclusion

Taking into account the comments made, only minor changes to the IIA may be necessary and could be considered in an Addendum to the IIA Report if required. The only recommendations for changes to the Local Plan relate to the HRA where minor changes to policy wording are suggested. These relate to references to 'other mitigation' beyond payment under RAMS and the need to adopt the approach progressed under future iterations of the Essex Coast RAMS SPD.

2. Consultation Review

2.1 Responses

A total of 54 comments were made by 39 respondents on the Pre-Submission (Regulation 19) Consultation Document IIA Report. **Table 2.1** provides a breakdown of the type and number of respondents.

Table 2.1 Type and Number of Respondents

[6] The requirement for SA of local plans is set out under section 19(5) of the Planning and Compulsory Purchase Act 2004.
[7] Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633).

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Type of Respondent	Number of Respondents
Parish/Town Councils or adjoining Local Authorities	4
Developers or Representatives	25
Other Agencies and Authorities	4
Members of the Public	6

2.2 Schedule of Responses to the Integrated Impact Assessment Report

Main Issues Raised

The main issues raised by respondents with regard to the IIA Report and the HRA Report are:

- Support for the IIA and its analysis.
- Objections to specific proposed strategic site allocations in respect of key sustainability criteria.
- Lack of justification for the proposed allocations, particularly in respect of the use of evidence.
- Specific site-related constraints which invalidate the choice of a specific site.
- Questioning the scoring by the IIA for specific indicators and how mitigation measures will be applied.
- The presence of alternative spatial options which are deemed more sustainable, consequently invalidating the choice of preferred allocations.
- Lack of a comprehensive Green Belt review undermining the IIA because a full range of alternative strategic options have not been presented.
- Concern that the protection of the Green Wedge is unnecessarily restrictive on new development meaning that all reasonable alternatives have not been fully assessed.
- Concern that the Housing Needs Assessment is outdated with consequent effects on the overall level of growth to be accommodated and associated spatial strategy.
- Lack of consideration of the availability and capacity of strategic and community infrastructure.
- Failure to present and appraise a sufficient range of reasonable alternatives, particularly higher growth options, leading to specific alternative sites and site options not being considered.
- Concern that the settlement hierarchy approach to the allocation of growth is overly restrictive, consequently preventing the testing of higher growth scenarios and ensuring that all reasonable alternatives are fully assessed.
- Correction of minor consistency errors in the presentation of results.

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- The need to reconsider the application of the HRA to a wider range of sites in relation to recreational disturbance Zone of Influence established by the Essex Recreational disturbance and Mitigation Strategy (RAMS).
- No specific comments were made on either the HIA or the EqIA.

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

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Table 2.2 Consultation Response Summary

Ref-erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
PSIIA-12	Sempra Homes	Table 5.8	It is important to highlight an apparent error in the Pre-Submission Integrated Impact Assessment whereby the results in the summary Table 5.8 do not align with the results set out in the full assessment provided in Appendix G	Comments on inconsistencies in scoring are noted. Appendix G is correct and the summary scores presented in Table 5.8 will be updated.
			Subject to confirmation from the Council on which table provides the correct assessment of this site, our client considers the apparent assumption (through the negative air and water quality scores) that building more homes automatically results in an increase in population, to be unsound. There are no known air or water quality issues for this site for example, and as such the score appears to relate to the perceived increase of water usage and/or traffic movements. This would not necessarily be the case here, given that it is anticipated that the majority of the future residents of the Site, post-development, are residents already living in Chelmsford.	The assessments are made in respect of specific aspects of the site option (air quality, water quality, and new infrastructure requirements) in light of available evidence, and the requirements of Development Management Policies which will implement mitigation in response to the detailed plans submitted by site proposers. The IIA considers housing and population increase across the Plan area and a working assumption is that resource use will increase, albeit with efficiencies, such as in water consumption. Furthermore, water supply forecasting is based on increased demand. The role of the IIA is to present an assessment of likely effects and where opportunities exist for their mitigation in light of proposed policies, and consequently enhancement of their overall sustainability performance and in respect of individual measures. No change to the IIA.
PSIIA-16	Maldon District Council (MDC)	Para 4.3.27	It is also noted within the IIA there has been an identified impact on the road infrastructure around Maldon and in particular B1026 Goldhanger Road on the eastern side of Heybridge. The assessment states this is due to the potential increase in traffic volumes as a result of the Chelmsford City Local Plan. The assessment also comments that based on the Maldon District Local Development Plan significant increases in traffic on roads near the SAC are not anticipated. MDC are concerned about this impact, particularly as we are currently reviewing our own local plan. Whilst	Comments on likely traffic impacts are noted; these concerns are being considered by the Council's traffic consultants who will prepare a formal technical response.

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Ref-erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			no decisions have been made on our growth options, some scenarios include the potential for growth in larger villages, for example Heybridge.	
PSIIA-17	Maldon District Council (MDC)	Figures 3.7, 3.8, 3.9	It should be noted the tables on pages 89-91 included within the IIA, are unreadable within the document. (NB: refers to Printed Pages 77 to 79).	Comments on readability are noted and will be reviewed.
PSIIA-15	Maldon District Council (MDC)	Para 3.8.9	It is noted the IIA refers to the need to upgrade the Water Treatment Works at South Woodham Ferrers. Although no final decisions have been made regarding our preferred strategy at this stage, please note that a large site within the MDC district on the boundary with South Woodham Ferrers has come forward in the Call for Sites and may form part of MDC's strategic site allocations, subject to further assessment work.	Comments noted. No change to the IIA.
PSIIA-20	A.G. & P.W.H Speakman	Para 6.4.14	Settlement Hierarchy The use of a settlement hierarchy to help inform the distribution of development within the administrative area is considered a logical approach, and a conventional one that has been successfully utilised in the preparation of a number of sound Local Plans prepared elsewhere in recent years. It can be a useful tool to ensure a sustainable distribution of development, although it is important that the application of the hierarchy to policies and allocation is not an overly simplistic one, and wider sustainability considerations are accounted for. We are supportive of the identification of Danbury as a Key Service Settlement. Whilst we agree that the use of a settlement hierarchy to help inform decisions regarding the scale of growth to be directed to the various settlements within the borough, as the policy text is currently worded, it is unclear how the settlement hierarchy as set out in Strategic Policy S7 is to be used by decision-makers.	Comments on re-wording of Strategic Policy 7 are noted. The Settlement Hierarchy is just one of several considerations for the Spatial Strategy, along with the Vision and Spatial Principles, and is considered to be a robust approach. Comments on the need to reconsider the Council's approach to Danbury's housing growth within the spatial strategy are noted. The Parish Council has selected the sites through a community-led approach, which is considered to be reasonable in relation to significant local constraints, and which resulted in the selection of the five chosen sites. Comments on exploring higher growth scenarios and additional allocations in sustainable settlements are noted. As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area.

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Ref-erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			The proposed spatial strategy will focus new housing and employment growth to the most sustainable locations by making the best use of previously developed land in Chelmsford Urban Area; new garden communities to the northeast and east of Chelmsford; sustainable urban extensions around Chelmsford; expansion of existing employment sites; and development around Key Service and Service Settlements outside the Green Belt in accordance with the Settlement Hierarchy. Whilst the IIA confirms the strategy has been informed by all of the five proposed spatial options published at the Issues and Options stage, the spatial strategy is predominantly a continuation of the adopted Local Plan spatial strategy. To make the plan sound, the Council must reconsider its approach to Danbury's housing growth within the spatial strategy. The proposed growth target should be increased to reflect the higher strategic housing requirement and Danbury's sustainable status as a Key Service Settlement. This will ensure that Danbury's growth is not artificially constrained and that it makes an appropriate contribution to Chelmsford's housing supply over the extended plan period. The IIA must also be updated to test higher growth scenarios for Danbury, ensuring that all reasonable alternatives are fully assessed. Without this, the Local Plan risks being found unsound at examination and requiring significant modification. By exploring higher growth scenarios and additional allocations in sustainable settlements, the plan would better reflect Chelmsford's role within the wider Housing Market Area and its ability to contribute positively to unmet housing needs in neighbouring authorities. Testing spatial options that include additional allocations in Key Service Settlements would demonstrate a proactive and justified response to the housing pressures within the wider region and reinforce Chelmsford's position as a key contributor to the sub-regional housing market. Allocating sites such as Land at Anchor Field would also support the strategic objective of promoting sustainable development and ensuring that growth is directed to locations with the infrastructure and services to support it effectively.	Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that: - Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds. - An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan, is not a "reasonable alternative". - The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process." A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA. No change to the IIA.

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Ref-erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
PSIIA-24	Hill Residential Ltd	Reasonable Alternatives (Section 6)	3.1 The Draft Local Plan's spatial strategy is fundamentally flawed, primarily due to its overemphasis on protecting the Green Belt, which undermines the Plan's promotion of the most sustainable patterns of development within the district. As drafted the Draft Local Plan is not sound and does not meet its legal requirement to be prepared with the objective of contributing to the achievement of sustainable development. We say this because: • the Spatial Strategy at Policy S7 is not based on a review of all reasonable alternatives and is, therefore, not justified; • To be found sound, the Plan and its evidence base must assess the release of Green Belt land around Key Service Settlements as a spatial scenario. Completing this analysis will reveal the significant benefits of a more sustainable pattern of development. This will not only justify the need for Green Belt release around Key Service Settlements such as Writtle, but also demonstrate the presence of exceptional circumstances. The Sustainability Assessment (SA) process negates the need to assess and consider sustainable patterns of development that include potential Green Belt Land 3.7 As a result, the SA is inadequate in terms of its assessments of the likely effects of the Plan's policies and its consideration of Reasonable Alternatives. By not assessing the most sustainable spatial scenario of distributing development to higher tier Key Service Settlements within the Green Belt, the SA fails to provide a range of Reasonable Alternative spatial scenarios. This has led to the draft housing allocations not being selected in preference to possible alternatives, based on a robust, objective and consistent approach and the Draft Local Plan is unjustified and, therefore, unsound.	The IIA has appraised the Local Plan Review from Issues & Options Stage through to Pre-Submission. The Local Plan Review contains reasonable alternatives as spatial, site and policy options. Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected. The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Pre-Submission Consultation Document presents a range of sites at various spatial scales which are considered to be capable of meeting the identified development requirements. As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that: - Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds.

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Ref-erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
				- An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”. - The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.” A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA. No change to the IIA.
PSIIA-28	The Bucknell Family	Reasonable Alternatives	Settlement Hierarchy 3.1 Utilising a settlement hierarchy, to guide the distribution of development within the administrative area, is deemed a logical and conventional approach, which has been successfully employed in the preparation of numerous sound Local Plans in recent years. This method can be a valuable tool for ensuring a sustainable distribution of development, although it is crucial that its application to policies and allocations should not be overly simplistic and should account for broader sustainability considerations. 3.2 However, in respect of employment growth, as currently set out the Plan does not consider the objective of promoting a prosperous rural economy and does not recognise that many employment allocations are more sustainably delivered around transport corridors, rather than focusing on a settlement hierarchy, which is	Comments on rewording use of settlement hierarchy in Strategic Policy S7 are noted. Comments on exploring higher growth scenarios and additional allocations in sustainable settlements and Green Wedge are noted. The Settlement Hierarchy is just one of several considerations for the Spatial Strategy, along with the Vision and Spatial Principles, and is considered to be a robust approach. Comments on exploring higher growth scenarios and additional allocations in sustainable settlements are noted.

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Ref-erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			generally a more appropriate mechanism for directing housing allocations to the most sustainable locations. 3.3 Although we broadly agree with the use of a settlement hierarchy to inform decisions regarding the scale of growth directed to various settlements within the Borough, the current wording of the policy text makes it unclear how the settlement hierarchy outlined in Strategic Policy S7 is to be utilised by decision-makers. 3.10 The Integrated Impact Assessment (IIA) acknowledges in assessing reasonably alternative spatial options, that for the transitional and higher growth levels additional site options over and above the existing Local Plan allocations will be required in order to meet residential and employment needs (paragraph 6.4.29). 3.18 The IIA has failed to properly test all reasonable alternatives and therefore the proposed Spatial Strategy, which has discounted all sites within the Green Wedge without properly assessing them, or the Green Wedge Designation, as a reasonable alternative, is unjustified and unsound.	The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process and can meet its development requirements without needing to undertake a Green Wedge review. This approach accords with the evidence base. As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that: - Reasonable alternatives does not include all possible alternatives: the use of the word “reasonable” clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds. - An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”. - The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.” A range of development quanta, broad distributions of development and site options available have been tested

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Ref-erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
				through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA. No change to the IIA.
PSIIA-27	The Bucknell Family	Para 6.4.11	The IIA acknowledges that the Council received approaches from Castle Point Borough Council, Southend on Sea City Council and Basildon Borough Council requesting that Chelmsford help meet unmet housing need through its Local Plan allocations (paragraph 6.4.11) and that there is no capacity in Chelmsford's proposed Spatial Strategy to accommodate any unmet housing need from neighbouring or nearby local authorities (paragraph 6.4.14). It would seem therefore entirely logical and appropriate to test spatial options that comprise release of land and sites from the Green Belt and/or Green Wedge in order to address unmet neighbouring housing need. As acknowledged in paragraph 6.4.15, even providing the full standard method assessment of 1,454 homes dpa would provide capacity for neighbouring unmet need.	Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected. The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process and can meet its development requirements without needing to undertake a Green Wedge review. This approach accords with the evidence base. The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Pre-Submission Consultation Document presents a range of sites at various spatial scales which are considered to be capable of meeting the identified development requirements. No change to the IIA.
PSIIA-32	Crest, Dandara, and Taylor Wimpey	Para 6.4.9	2.9 It is evident that the transitional arrangements are not intended to be used as an excuse to unnecessarily restrict development to pre-National Planning Policy Framework (NPPF) 2024 requirement levels. Where there are suitable, available and achievable sites that	The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process and has demonstrated that it can meet its development

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	Strategic Land (TWSL)		are able to increase housing delivery closer to the levels required by the NPPF 2024, the emerging Local Plan should support their delivery. 2.11 It is also noteworthy how the option to deliver higher growth has been considered through the sustainability appraisal of the Draft Local Plan (DLP), incorporated within the IIA. 2.12 The sustainability appraisal (or IIA in this case) is of particular relevance for two reasons. 2.13 Firstly, the NPPF (paragraph 32) is clear on the importance of sustainability appraisal in the plan-making process. 2.14 Secondly, that the preparation of a new Local Plan is required to required to comply with the Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No.1633) ('the SEA Regulations'), which transposes the plan-making elements of European Directive 2001/42/EC ('the SEA Directive') into UK law. 2.15 The SEA Regulations require that for plans such as the new Chelmsford Local Plan, an Environmental Report is prepared. In this case, the IIA seeks to discharge this obligation. 2.16 The Environmental Report is required to identify, describe, and evaluate the likely significant effects on the environment of proposed options, as well as on reasonable alternatives (Regulation 12(2) of the SEA Regulations). 2.17 Regulation 12(3) further sets out the information required to be included within the Environmental Report, referencing Schedule 2 of the SEA Regulations. Schedule 2 states that SA/SEA should consider short-, medium- and long-term effects; permanent and temporary effects; positive and negative effects; and secondary, cumulative and synergistic effects.	requirements as set out in Policy S7. This approach accords with the evidence base. The housing requirement in the plan meets at least 80% of the revised standard method housing need in line with the Government's latest plan-making transitional arrangements. Additional housing site allocations are not required. As noted in the IIA analysis (p.190) whilst Option 3 would meet the full needs identified through the revised Standard Method (1,406 dwellings per annum) and is therefore also identified as having the potential for a long-term significant positive effect. The housing delivery rates over the past 10 years have been in the order of 1,000 dwellings per annum. Whilst the provision of a quantum of housing beyond the transitional need is likely to provide additional flexibility in delivery and choice of tenure, over-delivery could be disruptive to the local housing market with demand failing to match supply and potentially stalled developments. As a result, there is an element of uncertainty in relation to Option 3. Thus the identification of uncertainty reflects a reasonable concern that growth would disrupt the chosen plan approach in respect of transitional growth. As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that: - Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to

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			2.18 As confirmed through case law (see Heard), whilst it is not necessary to keep open all options for the same level of detailed examination at all stages, at each stage the preferred option and reasonable alternatives must be assessed to the same level of detail. This includes considering alternatives for any modifications to a plan, even if late in the plan-making process. 2.19 In terms of the approach taken by the DLP to considering meeting the housing needs the 2024 NPPF, the IIA appears to acknowledge that planning to meet this higher growth figure is as reasonable alternative at paragraph 6.4.9 where it states: "Based on the evidence set out above, it is considered reasonable to explore alternatives for the following levels of housing growth: • Lower growth (approx. 955 dpa or 18,145 total dwellings) based on the Strategic Housing Needs Assessment (SHNA) published in 2023 and previous Standard Method. While it could be argued that this is not a reasonable alternative as it is not in line with the revised NPPF and Standard Method, it is being taking forward for further consideration as a number of representations were received from the public on the Preferred Strategy questioning the level of growth proposed in the plan. • Transitional growth (approx. 1,206 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 dwellings) based on the full housing need identified through the revised Standard Method published for consultation in September 2024. The higher level of growth proposed through the December 2024 NPPF and Standard Method has not been considered further at this stage as it was not available in sufficient time for consideration through this report." 2.20 As per the emphasised text in the preceding paragraph, the IIA appears to confirm that the housing requirement generated by the 2024 NPPF and its accompanying Standard Method is a reasonable alternative, but at the same time admit it has not been assessed, let alone to the same level of detail as the selected option.	which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds. - An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan, is not a "reasonable alternative". - The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process." A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA. No change to the IIA.

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			2.21 It is questionable whether a perceived inability to assess this option due to purported time constraints is a sufficient reason to fail to assess an option acknowledged to be a reasonable alternative as required by the SEA Regulations. 2.22 Notwithstanding the above and the commentary within the IIA at paragraph 6.4.9., we note that the IIA has assessed a higher growth scenario, albeit in the context of options for the spatial strategy. Spatial Strategy Option 3. 2.23 It is somewhat unclear what Spatial Strategy Option 3 assessed entails. At Table 6.3, the IIA states that Option 3 includes an increased number of dwellings in a number of locations, including West and North West Chelmsford. It confirms this option includes elements that make up the Site: 21SHELAA41, CFS165, and party of CFS182. 2.24 Conversely, and seemingly directly contradicting Table 6.3, in Table 6.4 of the IIA it reports that Spatial Strategy Option 3 would involve provision of zero additional homes in West and North West Chelmsford; but that it would encompass provision of additional employment floorspace. 2.25 Irrespective of this, and focussing on the matter of housing quantum only (as opposed to spatial strategy), the commentary on page 186 of the IIA provides the following view on Option 3: “The higher growth option (Option 3) performs more poorly overall reflecting greater resource use with greater uncertainty overall such as potential oversupply of housing in the plan period disrupting coordinated delivery against identified need” 2.26 There are two elements to the above that merit comment. 2.27 Firstly, the IIA refers to an “oversupply”. We consider that in the context of the Government’s clear exhortation to maximise provision of housing, any criticism of an option on the basis it would provide too many homes, without identifying any specific harm with such an approach is fundamentally flawed.	

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			2.28 Secondly, it is unclear what is meant by an oversupply of homes "disrupting co-ordinated delivery against identified need" – a Local Plan with a higher housing requirement would be able to provide a coordinate approach to meeting a higher figure. 2.29 For the above reasons, and having regard to other sustainable and deliverable sites that the emerging Local Plan does not currently propose to allocate (discussed further within Section 3) the proposed housing requirement is not considered sound.	
PSIIA-31	Crest, Dandara, and Taylor Wimpey Strategic Land (TWSL)	Table 6.3 and 6.5	3.22 The IIA includes consideration of most of the Site (as part of a group of sites that have been grouped together as 'West and North West Chelmsford') as one of the potential spatial strategies: Option 2c. 3.23 Table 6.3 of the IIA describes Option 2c as follows: Transitional growth includes existing adopted Local Plan allocations, new brownfield and small site options, West and North West Chelmsford (21SHELAA41; CFS165; CFS182 (Part); CFS82; CFS80; 21SHELAA100; 21SHELAA17; CFS183) and Land East and West of the A12, North and North West of Howe Green Sandon (CFS55). 3.24 Table 6.5 of the IIA suggests Option 2c scores very similarly to Option 2a (the selected option). 3.25 The three outline reasons given for the rejection of Option 2c are set out at paragraph 6.4.51 of the IIA, which states, in full: • "Although adjacent to the Chelmsford Urban Area, the sites at West and North West Chelmsford have poorer connectivity into the urban area of Chelmsford, and as such they are relatively isolated from the strategic highway network. There are less [sic] opportunities [to] create sustainable routes to existing public transport or provide new Bus Based Rapid Transit infrastructure. • The sites that comprise the West and North West Chelmsford site option are under multiple ownerships, which may delay delivery and result in piecemeal development. • Employment opportunities would be less accessible to the wider population (for example through public transport)."	Disagreement with the analysis is noted. Option 2c comprises a number of sites which together could deliver the transitional growth requirement and in-principle represent a reasonable alternative. However there is no evidence that Option 2c performs any better than the preferred allocations in respect of matters such as self-containment through mixed use development, relationship to established transport infrastructure and certainty of delivery, the latter influenced by the fact that the option comprises a number of sites under multipleownerships. In respect of the commentary on Option 3, the identification of uncertainty reflects a reasonable concern that growth would disrupt the chosen plan approach in respect of transitional growth. No change to the IIA.

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			3.26 Turning to the first reason given for rejecting the Site, we reject the assertion that development to the west of Chelmsford lacks opportunities to create sustainable routes to existing public transport or provide new public transport infrastructure. 3.27 As set out in the Concept Masterplan for the Site (provided as Appendix A), this includes provision for a new park & ride / mobility hub. In addition, the Site is accessible from across the city for pedestrians and cyclists, and by bus. There are pedestrian and cycle connections into the city via the Chignal Estate and Admirals Park, and to Writtle. These connect the Site to secondary schools, the city centre, and train and bus stations. Existing bus services on Roxwell Road could be diverted into the Site to provide additional connections to the city centre and to Writtle. 3.28 The Site would represent a logical extension to an existing growth location coming forward (West Chelmsford) for which the approved masterplan confirms will include additional footpaths and cycleways, which could also benefit development of the Site. 3.29 In respect of the second reason for rejection, the promoters of the three parcels that comprise the Site are taking a coordinated approach to its development, as demonstrated by the preparation of the Concept Masterplan for the Site and, indeed, by this representation itself. 3.30 Thirdly, in relation to employment opportunities be less accessible (than to the selected employment site at Location 16b) whilst this may be the case, this is only relevant to the Site / West and North West Chelmsford, if one excepts any spatial strategy options entailing a residential-led development of the Site would necessarily have to be accompanied by the employment development at Howe Green, Sandon (CFS55). 3.31 However, it is patently not the case. Indeed, there is nothing to suggest that a residential-led development of the Site in West Chelmsford would be intrinsically linked to provision of employment	

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			land at Howe Green (south of Chelmsford). There is no reason, for example, why residential-led development at West Chelmsford along with employment development at Location 16b (the selected employment site) could not be considered a potential spatial strategy. 3.32 It is unclear to what degree this baseless grouping of development at West Chelmsford with employment development at Howe Green into a single option has infected the assessment of the former's sustainability to form part of a spatial strategy for the borough. But the third reason for the rejection of Option 2c demonstrates it has been determinative to at least some degree. Furthermore, the first reason appears more applicable to employment development at Howe Green (somewhat detached from the City) than it does to a westward extension to Chelmsford. 3.33 In effect, the IIA presents a false choice, with West Chelmsford compared with other options only as part of an option that includes employment development at Howe Green. 3.34 Option 3 is considered by the IIA as a higher growth option that combines Options 2a with 2c. 3.35 The clear advantage of this over (or rather, in combination with) the selected Option 2a, is that Option 3 would better reflect the Government's call to maximise the potential for housing delivery as well as addressing affordable housing needs. However, the benefit of this is not reflected in the IIA appraisal of the Site against SA objective 2 – not only is this option scored no better than option that will deliver far fewer homes, but some of the commentary is somewhat negative, with the IIA stating that: "Whilst the provision of a quantum of housing beyond the transitional need is likely to provide additional flexibility in delivery and choice of tenure, over-delivery could be disruptive to the local housing market with demand failing to match supply and potentially stalled developments. As a result, there is an element of uncertainty in relation to Option 3".	

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			3.36 As per our comments in respect of Strategic Policy S6 set out in Section 2 of this representation, the view that an option could deliver too many homes is clearly baseless in the light of current national policy and guidance; particularly when such a number is merely that for which a future Local Plan would be required to deliver. 3.37 Nevertheless, we note that the reasons for rejection of Option 3 do not cite its performance against the housing objective. Instead the reasons given are, in full, as follows: “Option 3 is rejected because: • Lack of strategic highway capacity at Junction 17 of the A12 and no deliverable junction improvements planned to accommodate strategic scale employment growth at this location. • Its relative isolation from existing residential areas, services and facilities which would lead to higher reliance on the use of the private car, including for access to employment. • This location has lower landscape capacity to accommodate employment development compared with the Council’s preferred option at Location 16b. 3.38 All of the above reasons appear to relate solely to the inclusion of land at Howes Green, Sandon as an employment allocation, i.e. they fail to consider a higher growth option that includes West / North West Chelmsford, plus Location 16a and 16, but not employment development at Howes Green, Sandon. 3.39 Again, a false choice has been presented – one in which the higher growth option is only an option when it encompasses employment development at a particular location, one deemed unsustainable (or, at the very least, less sustainable). 3.40 The fallacy of the IIA’s conclusions is further evident by the fact that in its outline reasons for the rejection of Option 3, it cites Location 16b as being preferable in terms of landscape impacts, when Option 3 includes Location 16b (Land adjacent to A12 Junction 18 Employment Area (21SHELAA5)), as confirmed in IIA Table 6.4.	

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			3.41 There is a potential solution to these issues, and we consider the DLP is still capable of being made sound. The IIA should consider an additional higher growth option, but one that excludes employment development at Howe Green.	
PSIIA-14	Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group	Table 5.10	We strongly object to the ratings given to Site Refs. 16a and 16b. We note that the scores for both sites have improved since the Regulation 18 Draft IIA, and this is despite there being only very minimal tweaks made to the wording of the proposed allocations in the Regulation 19 draft Local Plan. Specifically, we note that the Council's own evidence base on transport impact identifies key areas of concern in relation to the highways effects of the development of the two strategic sites, and thus it is not clear why the sites do not score 'significant negative impact' for this criterion. Very high impacts have also been identified in relation to the loss of an area of high landscape value, and impact on the significance of a range of designated heritage assets at Hammonds Farm. The mitigation proposed is minimal, and not sufficient to address the high impacts identified. Site 16a should also receive a 'significant negative impact' score for these two criteria. Site 16b lies within a Minerals Safeguarding Area, and thus it is unclear why is scores 'neutral' for the 'Waste and Natural Resources' criterion. Development of this site will also have significant adverse impacts in relation to harm to heritage assets, and should score 'red' for this criterion also. In our submitted main representations to the Regulation 19 Draft Local Plan, we have identified substantial and significant adverse impacts that will arise from the development of both sites 16a and 16b. The draft Local Plan does not explain how these impacts can be adequately mitigated. It is thus our view that the IIA has under-estimated the impacts associated with the development of these strategic sites, and we request that the assessment is revisited, particularly with regards to the criteria of 'transport', 'waste and natural resources', 'cultural heritage' and 'landscape and townscape'. No justification has been provided for why the rating of the sites has changed between the Regulation 18 and Regulation 19 draft IIA. The change to the scoring is illogical, given that only	Objection to the improvement of ratings for sites 16a and 16b are noted. Additional information on site development provided by the site proposers in their Regulation 18 Preferred Options representations has been considered by the Council alongside other Regulation 18 representations, the plan evidence base and Statement of Common Ground. Consequently, the site-specific policy was improved and strengthened in the Pre-Submission Local Plan including in relation to minimising and mitigating potential landscape, biodiversity, heritage, flood risk and heritage impacts. The IIA has taken account of these site policy changes and the scoring adjusted accordingly. No change to the IIA.

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			very minor tweaks have been made to the proposed wording of the allocations.	
PSIIA-44	Little Baddow, Boreham, Danbury & Sandon Parish Council Cross Working Group	6.6.40	4.25 The Local Plan Pre-Submission Integrated Impact Assessment (IIA) considers an alternative option (Option 2c), whereby 3,000 new homes and 43,000 sq.m of employment floorspace could be located on identified development parcels within West and North West Chelmsford (on site refs. 21SHELAA41; CFS165; CFS182 (part); CFS82; CFS80; 21SHELAA100; 21SHELAA17; and CFS183). 4.26 This alternative option would deliver the same benefits in terms of housing and employment land provision as Hammonds Farm, but in a location that is sited directly adjacent to the existing built-up area of Chelmsford. The IIA explains that Option 2c is rejected because – although adjacent to the Chelmsford Urban Area – the sites have poorer connectivity into the urban area, and are relatively isolated from the strategic highway network. It is also noted that there are less opportunities to create sustainable routes to existing public transport or provide new Bus Based Rapid Transport Infrastructure. It is noted that the area contains sites in multiple ownership and employment opportunities would be less accessible to the wider population. 4.27 We disagree with this analysis. The plots have all been submitted as part of the Council's Call for Sites exercise and are shown to be 'green' for availability in the Strategic Housing and Employment Land Availability Assessment (SHELAA), meaning that they are held by a developer / willing owner / public sector, and should therefore be considered to be available for development. The fact that the sites are in different ownerships should not in itself represent a constraint to development. Indeed, it is common for strategic developments to proceed on land which is owned by a consortium of parties. 4.28 With regards to the site's accessibility, the plots lie adjacent to the existing urban area, and existing, direct pedestrian / cycle connections are available to Chelmsford City Centre via Roxwell Road (the A1060). In addition, the sites benefit from close proximity	The reasons for rejection of Option 2c are set out within the Pre-Submission IIA Report (para 6.4.51 p.187), namely: • Although adjacent to the Chelmsford Urban Area, the sites at West and North West Chelmsford have poorer connectivity into the urban area of Chelmsford, and as such they are relatively isolated from the strategic highway network. There are less opportunities create sustainable routes to existing public transport or provide new Bus Based Rapid Transit infrastructure. • The sites that comprise the West and North West Chelmsford site option are under multiple ownerships, which may delay delivery and result in piecemeal development. • Employment opportunities would be less accessible to the wider population (for example through public transport). Disagreement with the analysis is noted; however there is no evidence that Option 2c performs any better than the preferred allocations in respect of matters such as self-containment through mixed use development, relationship to established transport infrastructure and certainty of delivery. No change to the IIA.

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			to existing infrastructure in the western part of Chelmsford, including existing bus stops / routes (along Roxwell Road, Avon Road and Chignal Road); a Morrisons foodstore, library, community hall, and Chelmsford City Football Club stadium. Whilst further enhancements and infrastructure would necessarily be delivered as part of the strategic development proposals, it is clear that there is a foundation upon which to build, and the plots are well-located with regards to the existing facilities within Chelmsford. 4.29 Moreover, the Pre-Submission Local Plan does propose to allocate one site in this area, directly adjacent to the plots identified above. Draft Strategic Growth site Policy 2 is proposed for a 'sustainable neighbourhood', that maximises opportunities for sustainable travel, and that will deliver 880 new homes, a Travelling Showpeople site for 5 serviced plots, a new neighbourhood centre, and a new primary school. The site will take main vehicular access from Roxwell Road, and will provide "safe and convenient pedestrian and cycle connections", including new dedicated pedestrian and cycle links to the existing urban area, and well-connected internal road layouts to allow good accessibility for bus services. The policy justification text (paragraph 7.115) describes the site as offering: "an opportunity for a landscape- led sustainable urban extension that maximises opportunities for travel by sustainable modes". 4.30 As such, it is unclear why the other sites identified within the West and North West Chelmsford area, which lie directly adjacent to both the existing urban area and the planned development at Site Policy 2, have been ruled out as a potential suitable and sustainable location to accommodate future growth. 4.31 Taking the above into account, it is unclear why the IIA should favour Hammonds Farm, which is entirely disconnected from the urban area; where the A12 is a physical barrier to movement; and where the delivery of convenient and efficient active and sustainable travel linkages will be challenging.	

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			4.32 Moreover, the IIA should also take into account the fact that the plots in West and North West Chelmsford are potentially less constrained than Hammonds Farm, and it is our view that growth in this direction would represent a less harmful strategy. We note that the main plots of land in West and North West Chelmsford score well in terms of their 'suitability' in the Council's Strategic Housing and Employment Land Availability Assessment (SHELAA, Autumn 2024).	
PSIIA-18	Cliffords Group Ltd	Para 6.4.11	The IIA confirms that site options within the Metropolitan Green Belt and Green Wedge would not be considered as part of the spatial options to meet residual needs. This, it explains, is primarily because there are sufficient and suitable site options available outside of these areas in order to meet the proposed development requirements. However, meeting development needs is not simply about fulfilling housing numbers to accommodate future growth in purely numerical terms — it is incumbent upon the plan-making process to ensure the Local Plan will do so in a sustainable manner. Case law (e.g. Calverton) confirms that a key factor in determining whether there are exceptional circumstances which justify alterations to the Green Belt is whether it is possible to meet development needs sustainably without doing so. The IIA further states that Chelmsford's proposed Spatial Strategy has no capacity to accommodate unmet housing needs from neighbouring authorities (paragraph 6.4.14). Therefore, it would be logical and appropriate to test spatial options involving the release of land from the Green Wedge to help address this shortfall. As acknowledged in paragraph 6.4.15, even providing the full standard method assessment of 1,454 homes per annum would create capacity for some neighbouring unmet need — a scenario based on a spatial option that does not release land for housing from the Green Wedge. The IIA has therefore failed to test all reasonable alternatives. Discounting all sites within the Green Wedge without properly assessing them as reasonable alternatives makes the proposed Spatial Strategy unjustified and unsound.	Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected. The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process and can meet its development requirements without needing to undertake a Green Wedge review. This approach accords with the evidence base. The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Pre-Submission Consultation Document presents a range of sites at various spatial scales which are considered to be capable of meeting the identified development requirements. As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of

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				growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that: - Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds. - An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan, is not a "reasonable alternative". - The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process." A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA. No change to the IIA.
PSIIA-19	Cliffords Group Ltd	Para 6.4.29	The Integrated Impact Assessment (IIA) acknowledges that to meet residential and employment needs under transitional and higher growth levels, additional site options beyond the existing Local Plan allocations will be required (paragraph 6.4.29).	The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process and can meet its development requirements without needing to

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			The IIA suggests that residual housing needs can be met without using sites within the Green Wedge. However, it also notes that Chelmsford City Council has received requests from Castle Point Borough Council, Southend-on-Sea City Council, and Basildon Borough Council to help meet their unmet housing needs through Chelmsford's Local Plan allocations (paragraph 6.4.11). The IIA further states that Chelmsford's proposed Spatial Strategy has no capacity to accommodate unmet housing needs from neighbouring authorities (paragraph 6.4.14). Therefore, it would be logical and appropriate to test spatial options involving the release of land from the Green Wedge to help address this shortfall. As acknowledged in paragraph 6.4.15, even providing the full standard method assessment of 1,454 homes per annum would create capacity for some neighbouring unmet need — a scenario based on a spatial option that does not release land for housing from the Green Wedge. The IIA has therefore failed to test all reasonable alternatives. Discounting all sites within the Green Wedge without properly assessing them as reasonable alternatives makes the proposed Spatial Strategy unjustified and unsound. However, the Spatial Strategy can be made sound by allocating sites within the Green Wedge, such as land south of Wheelers Hill, to support higher housing delivery and, in part, help meet the unmet housing needs of neighbouring authorities.	undertake a Green Wedge review. This approach accords with the evidence base. The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Pre-Submission Consultation Document presents a range of sites at various spatial scales which are considered to be capable of meeting the identified development requirements. As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that: - Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds. - An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan, is not a "reasonable alternative". - The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a

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				reasonable alternative and it does not have to be included in the SEA Report or process." A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA. No change to the IIA.
PSIIA-26	Taylor Wimpey Strategic Land	Reasonable Alternatives	In respect of the broad locations and strategic approach advocated by Strategic Policy S7, and in addition to the concerns set out in the Joint Representation, we wish to raise the following. The IIA notes six spatial strategy options that were considered, but that it only considers the Site as part of a much larger growth in West Chelmsford, despite the availability of smaller sites to the west of Chelmsford to come forward either individually or as part of more strategic growth. The exploration of potential spatial strategies, and the appraisal of options, should not be limited to those that entail large-scale strategic growth to the west of Chelmsford. One consequence of the proposed spatial strategy's focus on large-scale strategic growth sites is that the Draft Local Plan (DLP) becomes reliant on a small number of large, potentially complex, sites to deliver housing. This does not render the allocation of such sites unsound, but the over-reliance on such sites to meet housing needs without additional allocation of smaller sites to ensure the new Local Plan is imbued with sufficient flexibility to be able to meet housing needs in a timely manner, is a soundness issue. In such circumstances, it is particularly important to ensure a range of different sites that can address housing needs in the event progress of others is slowed.	The reasons for rejection of Option 2c are set out within the Pre-Submission IIA Report (para 6.4.51 p.187), namely: • Although adjacent to the Chelmsford Urban Area, the sites at West and North West Chelmsford have poorer connectivity into the urban area of Chelmsford, and as such they are relatively isolated from the strategic highway network. There are less opportunities create sustainable routes to existing public transport or provide new Bus Based Rapid Transit infrastructure. • The sites that comprise the West and North West Chelmsford site option are under multiple ownerships, which may delay delivery and result in piecemeal development. • Employment opportunities would be less accessible to the wider population (for example through public transport). Disagreement with the analysis is noted; however there is no compelling evidence that Option 2c performs any better than the preferred allocations in respect of matters such as self-containment through mixed use development, relationship to established transport infrastructure and certainty of delivery.

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			Separately, as noted within the Joint Representations but also of particular relevance to the Site, it is notable that the criticisms and reasons given for the rejection of options that entail large-scale growth to the west of Chelmsford appear largely confined to the provision of employment land at Howe Green, which has been rolled into the option that includes West Chelmsford. In short, the IIA does not justify the rejection of the Site / West Chelmsford as it is required to do, bearing in mind the intended purposes of the IIA as per the NPPF and the requirements of the SEA Regulations.	As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the Borough. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that: - Reasonable alternatives does not include all possible alternatives: the use of the word “reasonable” clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds. - An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”. - The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.” A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA.

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				No change to the IIA.
PSIIA-34	Tritton Farming Partnership LLP	6.6.40	The reasons for the rejection / selection of options are set out in the Integrated Impact Assessment which accompanies the Local Plan Pre-Submission (Regulation 19) Document. The IIA seeks to discharge the Council's obligations under Directive 2001/42/EC ('the SEA Directive'); the plan-making aspects of which are transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No.1633) ('the SEA Regulations'). Such requirements include the need to assess reasonable alternatives to the same level of detail as those that have been selected; and to explain the reason for rejection / selection of options. 3.43 Looking specifically at the consideration of the Site as part of Option 2b, the IIA provides the following reasons for rejection of the Options : • Chatham Green is relatively isolated from the strategic highway network and new railway station, with limited sustainable accessibility or opportunity for solutions. • Its relative isolation from existing services and facilities which would lead to higher reliance on the use of the private car. • Landscape capacity and sensitivity concerns. • There is limited wastewater capacity to accommodate this development (Water Cycle Study 2024). • Employment opportunities would be less accessible to the wider population (for example through public transport). 3.44 Firstly, that Chatham Green is relatively isolated from the strategic highway network and new railway station, with limited sustainable accessibility or opportunity for solutions. The Site would utilise significant infrastructure improvements being delivered and planned (as large scale proposals should), most notably the CNEB and Beaulieu Park Rail Station. Furthermore, it has the potential to help ensure that Section 1b and Section 2 of the CNEB are delivered, with resultant benefits to the wider community.	Disagreement with the analysis is noted; however there is no compelling evidence that the Chatham Green Site performs any better than the preferred allocations in respect of matters such as self-containment through mixed use development, relationship to established transport infrastructure and certainty of delivery. As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that: - Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds. - An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan, is not a "reasonable alternative". - The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process."

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			3.45 Secondly, that Chatham Green is relatively isolated from existing services and facilities, and consequently growth at this location would lead to reliance on the private car. The IIA's concerns in respect of the Site's isolation from services and facilities is misplaced, as it overlooks that a new community is proposed of a scale such that some services and facilities will be provided as part of the new development, and in close proximity to future residents. Furthermore and in any case, the Site is in proximity to a number of existing services and facilities planned or recently brought forward as part of strategic scale growth in North East Chelmsford which are accessible / can be made accessible by sustainable transport modes as part of development of the Site, including the existing bus routes along the A131 and the cycle routes planned for CNEB. 3.46 Thirdly, landscape capacity and sensitivity. The justification for this stance is unclear. Land to the east of Chatham Green is not subject to any landscape designations which suggest it is any more sensitive than any other greenfield land in the borough. 3.47 Fourthly, that there is limited capacity at the wastewater recycling facilities serving the area. A Foul Drainage Technical Note was commissioned to consider the capacity concerns raised and whether there are any potential options to mitigate this. A copy of this Technical Note is provided as Appendix D. The Technical Note confirms that this potential constraint can be overcome, identifying three options. One option includes utilising land under the Tritton Farming Partnership's control. 3.48 Lastly, that employment opportunities would be less accessible to the wider population (for example through public transport). Development on the site could be at a scale that provides the opportunity for improvements to public transport and sustainable travel including the existing bus routes along the A131 and the cycle routes planned for CNEB. 3.49 In overview, none of the reasons cited by the IIA for the rejection of strategic level growth at Chatham Green are applicable to the Site (i.e. are not applicable to Land East of	A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA. No change to the IIA.

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			Chatham Green) and its proposed development for a new community.	
PSIIA-10	CHP	Para 5.8	It is important to highlight an apparent error in the Pre-Submission Integrated Impact Assessment whereby the results in the summary Table 5.8 do not align with the results set out in the full assessment provided in Appendix G.	Comments on inconsistencies in scoring are noted. Appendix G is correct and the summary scores presented in Table 5.8 will be updated.
PSIIA-10	CHP	Para 5.8	4.3 Subject to confirmation from the Council on which table provides the correct assessment of this site, our client considers the apparent assumption (through the negative air and water quality scores) that building more homes automatically results in an increase in population, to be unsound. There are no known air or water quality issues for this site for example, and as such the score appears to relate to the perceived increase of water usage and/or traffic movements. This would not necessarily be the case should at least the majority of residents already live in Chelmsford. This is particularly likely for the development of Andrews Place as if the majority of units are affordable homes, they will be used to house those in need of housing within the Chelmsford District. Please see accompanying document.	The assessments are made in respect of specific aspects of the site option (air quality, water quality, and new infrastructure requirements) in light of available evidence, and the requirements of Development Management Policies which will implement mitigation in response to the detailed plans submitted by site proposers. The IIA considers housing and population increase across the Plan area and a working assumption is that resource use will increase, albeit with efficiencies, such as in water consumption. Furthermore, water supply forecasting is based on increased demand. The role of the IIA is to present an assessment of likely effects and where opportunities exist for their mitigation in light of proposed policies, and consequently enhancement of their overall sustainability performance and in respect of individual measures. No change to the IIA.
PSIIA-52	Dandara	Chapter 5	3.4 Chapter 5 of the IIA sets out the assessment of the proposed growth areas and associated proposed site allocations. As mentioned in earlier parts of these representations, part of Land East of Pleshey Road, Ford End has been allocated within the Pre-Submission Local Plan for 20 dwellings. 3.5 Table 5.9 provides a summary of the appraisal of proposed allocations in Growth Area 2 – North Chelmsford. The table has identified that the site allocation at Ford End (under Policy 14 b) would make a very positive contribution to the IIA priority of providing more homes in Chelmsford. The assessment notes the	Comments of support are noted. Comments on recognition of biodiversity effects are noted. The sustainability performance of the site and wider land is noted. Appendix M sets out the comparative GIS analysis of proposed allocations and reasonable alternatives to help inform the site selection process. The Council has considered the suitability of alternative development strategies and sites to accommodate

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			site allocation also provides a positive contribution toward sustainable living and revitalisation, as well as mixed, minor or uncertain impacts on biodiversity, health and wellbeing and transport. The site allocation would have a small negative impact on cultural heritage and landscape and townscape. The only major negative impact identified in the assessment relates to land use. Further commentary and explanation of this appraisal is provided at various points in the IIA. 3.6 Dandara agree that the allocation of the site at Ford End will have benefits towards the housing supply and the sustainability and revitalisation of the village of Ford End. We do, however, consider that the IIA should also recognise the benefits to biodiversity which will be provided through the provision of 10% BNG as well as benefits to transport which will be delivered through appropriate highway improvements and measures to promote and enhance active travel. Equally, the development of the site would also provide benefits to the local economy through use of local firms for construction as well as the new residents providing enhancement to the local economy through use of local facilities and services. It is considered the impacts to cultural heritage should be considered neutral as the site allocation already requires a scheme which is sensitive to the non-designated heritage asset of Ford End Primary School. 3.7 The IIA concludes that the Site complies well with the Strategic Priorities, Vision, Spatial Principles and Spatial Strategy, in particular with regard to the Settlement Hierarchy. The Site is also supported by the evidence base for the Plan, such as the Heritage Assessment and Landscape Capacity and Sensitivity Assessment. Overall, the IIA has not found any constraints which would hinder the deliverability, viability or availability of the site. Dandara completely support and agree with these conclusions. 3.8 The wider Site which was submitted to the Call for Sites, as well as promoted through the previous Local Plan consultations, covered 5.37 hectares and has the capacity to provide up to 50 homes. This iteration of the IIA no longer provides comment on the reasoning behind not including further land within the allocation, as was included in the IIA provided with the Preferred Options	development as part of the plan preparation process and has demonstrated that it can meet its development requirements as set out in Policy S7. This approach accords with the evidence base and sets out a number of spatial strategy options which have been developed taking the site options into account along with other matters/ evidence. Outline reasons for the selection or rejection of spatial strategy options are set out in paras 6.4.47 to 6.4.53, which may make reference to an individual site options if they are key component of that spatial strategy option. No change to the IIA.

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			consultation. This set out the following reason for why the wider part of the site has been discounted: The remaining non-allocated part and the southern parcel extend to the south. They are further away from the DSB and would not respect the existing settlement pattern of Ford End. The full site is greater than 1 hectare in size. 3.12 The IIA has demonstrated that allocation of Land East of Pleshey Road, Ford End is in accordance with Pre-Submission Local Plan objectives and scores well in their assessment with beneficial impacts on housing supply and the sustainability of Ford End, whilst also not having any constraints associated with its deliverability (although this assessment is only considering 1 hectare of the site, we argue that this is applicable to the site as a whole). We therefore urge the Council to reconsider a larger allocation at Land East of Pleshey Road, Ford End.	
PSIIA-39	Dandara	Para 6.4.40	The evidence base supporting the draft Plan does not present convincing evidence to justify the decision to allocate Hammonds Farm in favour of other options West of Chelmsford that are better connected to existing services. The Integrated Impact Assessment suggests that housing growth at West Chelmsford was only considered in one of the six spatial strategy options tested. This was Option 2(c), where 3,000 dwellings would have been delivered at West and North-West Chelmsford (21SHELAA41; CFS165; CFS182 (Part); CFS82; CFS80; 21SHELAA100; 21SHELAA17; CFS183), including on Dandara's land. It suggests that this option was rejected because: ● "Although adjacent to the Chelmsford Urban Area, the sites at West and North-West Chelmsford have poorer connectivity into the urban area of Chelmsford, and as such they are relatively isolated from the strategic highway network. There are less opportunities create sustainable routes to existing public transport or provide new Bus Based Rapid Transit infrastructure. ● The sites that comprise the West and North-West Chelmsford site option are under multiple ownerships, which may delay delivery and result in piecemeal development Employment opportunities would be less accessible to the wider population (for	Disagreement with the analysis is noted; however there is no compelling evidence that Option 2c performs any better than the preferred allocations in respect of matters such as self-containment through mixed use development, relationship to established transport infrastructure and certainty of delivery. No change to the IIA.

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			example through public transport).” Para 6.4.51 2.31 Dandara disputes these findings, for the following reasons: ● The sites cannot be considered to have poorer connectivity to the Chelmsford’s urban area. Not only are they more proximate to it, enabling genuine opportunities to walk or cycle to Chelmsford City Centre and access other services and facilities in its urban area, they are located directly adjacent to existing public transport routes and other infrastructure. This position is supported the Council’s own Sustainable Accessibility Mapping and Appraisal evidence base document 2022 (document T003), which scored eight potential development locations. The Edge of Chelmsford extension (which included West Chelmsford and East Chelmsford) scored fourth best. Only the brownfield development options in the urban area, North-East Chelmsford and South Woodham Ferrers scored better. Location 8, the Hammonds Farm option, scored second worst. ● The ownership structure of the sites at West and North-West Chelmsford will not significantly impinge upon their delivery timeframes or risk piecemeal development. Dandara alone controls 81 hectares of land at North-West Chelmsford that can deliver a sustainable new neighbourhood of around 850 new homes. It could come forward in isolation, or as part of a wider allocation to include land to the south and south-west controlled by Taylor Wimpey and Crest Nicholson. All three developers are collaborating on the promotion of these sites, demonstrated by the submission of joint representations on the Plan (under separate cover) and a development option that includes delivery of an additional road link through the three sites between the A1060 and Chignal Road. Concerns about multiple land ownerships should not be a reason to discount growth at West and North-West Chelmsford. ● The main employment opportunity proposed at Hammonds Farm is the separate employment site 16b, located adjacent to junction 18 of the A12. This could come forward without the wider residential-led allocation. In any case, whilst this location is accessible from the A12, it is poorly connected the population of Chelmsford’s urban area by anything other than car-based transport. The Council and the Inspector must consider the benefits of development at West and North- West Chelmsford more thoroughly	

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			before the Plan can be found sound. The soundness of the decision to allocate a new settlement away from Chelmsford's urban area ahead of any further allocations to the west of Chelmsford is particularly concerning given that a major allocation at West Chelmsford (Warren Farm) was found to be the preferred solution in the adopted Local Plan just five years ago. This decision was taken partly due to its proximity to the City Centre and the unique opportunity presented by this location to provide access to central Chelmsford (and other services to the west, such as Morrisons and other facilities at Newlands Spring and Melbourne) on foot or by bicycle. The Council should be prioritising active, sustainable travel over access to the strategic road network, otherwise it will simply end up with car-dependent, dispersed patterns of development. By contrast, incremental extensions to the West Chelmsford growth location would be entirely logical to maximise the opportunity to provide access to the city via active travel and ensure that new development is integrated with existing facilities and infrastructure. 2.33 Further development here also presents opportunities to enhance the highway network and connections between the A1060 and Broomfield (relieving pressure on Chignal Road) alongside the delivery of public transport improvements and new park and ride facilities, as explained elsewhere. These opportunities must be fully explored before the Plan is finalised.	
PSIIA-40	Crest Nicholson	6.4.9	It is unclear if the Integrated Impact Assessment (IIA) which accompanies the Draft Local Plan (DLP) has appropriately considered the higher growth option that would meet the new Standard Method, despite acknowledging that it is a reasonable alternative. The IIA notes six spatial strategy options that were considered, but that it only considers the Site as part of a much larger growth in West Chelmsford, despite the availability of smaller sites to the west of Chelmsford to come forward either individually or as part of more strategic growth. 4.5 The NPPF expressly notes that "Small and medium sized sites can make an important contribution to meeting the housing	As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that: - Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to

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			requirement of an area, and are often built-out relatively quickly" (paragraph 70). 4.6 The exploration of potential spatial strategies, and the appraisal of options, should not be limited to those that entail large-scale strategic growth to the west of Chelmsford. it is notable that the criticisms and reasons given for the rejection of options that entail large-scale growth to the west of Chelmsford appear largely confined to the provision of employment land at Howe Green, which has been rolled into the option that includes West Chelmsford. In short, the IIA does not justify the rejection of the Site / West Chelmsford as it is required to do, bearing in mind the intended purposes of the IIA as per the NPPF and the requirements of the SEA Regulations.	which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds. - An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan, is not a "reasonable alternative". - The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process." A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA. No change to the IIA.
PSIIA-35	Obsidian Strategic Asset Management Ltd	Appendix K	3.5.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies that are set out in local plans must be the subject of a Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against all reasonable alternatives. 3.5.2 The Local Plan should ensure that the results of the SA	Disagreement with the analysis of the IIA is noted. The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process and has demonstrated that it can meet its development requirements as set out in Policy S7. This approach accords with the evidence base. As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and

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			process clearly justify any policy choices that are ultimately made, including the proposed spatial strategy and site allocations (or any decision not to allocate sites) when considered against 'all reasonable alternatives'. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Council's decision making, and scoring should be robust, justified, and transparent. The Proposed Spatial Strategy draws on aspects of the five spatial options set out in the Issues and Options Consultation Document, which comprised: Approach A: Growing Existing Strategy; Approach B: Growth in Urban Areas; Approach C: Wider Strategy; Approach D: Growth Along Transport Corridors; Approach E: New Settlement. 3.5.3 Although the proposed Spatial Strategy is a hybrid of Spatial Approaches A to E, it most resembles Spatial Approaches A and B by focusing development in and close to the Urban Areas and Key Service Settlements outside of the Green Belt, whilst providing for continued housing and employment land provision through the proposed allocation of a new garden community, and sites in the Chelmsford Urban Area. 3.5.4 Approaches A and C include new allocations at larger villages, including Broomfield. We continue to disagree with the reasoning presented to support the rejection of Broomfield as a location for growth on the basis of employment and transport considerations. 3.5.5 Appendix K provides an appraisal of the alternative spatial approaches. Under Assessment Objective 3 (Economy, Skills and Employment), Approach C is given an assessment score of Minor Positive. This is a lower grading than the other approaches. The reason given is: "Under this approach residential development would be more dispersed throughout the City Area and including at settlements without major employers and which are less accessible to the City Centre. In consequence, prospective residents in these	assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that: - Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds. - An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan, is not a "reasonable alternative". - The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process." A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA. No change to the IIA.

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			settlements would be likely to have poorer accessibility to employment opportunities, notwithstanding the presence of some major employers in some locations, such as Broomfield." 3.5.6 The IIA does not provide a clear explanation as to why further growth in Broomfield should receive a lower score, considering that it is a Key Service Settlement which features the Council's single largest employer, Broomfield Hospital. 3.5.7 Similarly, under Assessment Objective 6 (Transport), Approaches A are C are both assessed as Minor Positive / Minor Negative. The negative being that directing a proportion of the City Area's housing requirement to the smaller settlements could result in increased car use given the existing size of the settlements and the more limited range of services and jobs they provide. 3.5.8 Again, this is considered to be a generalisation. Broomfield has the major services that would be expected of a regional centre, for example Broomfield Hospital as well as one of Chelmsford's largest secondary schools. It is very well located for accessibility to Chelmsford, being described in the adopted Local Plan as a 'quality' bus corridor with a very good frequency of services connecting into Chelmsford City Centre. Indeed, the IIA recognises under Approach A that: "new development does present an opportunity to enhance the sustainability of these settlements by supporting investment in community facilities and services, developing their existing strengths which in some cases include key employers and good public transport infrastructure". 3.5.9 Opportunities for further development in Broomfield should not be discounted on the grounds that it performs poorly in employment and transport terms. As a result, we can conclude that the plan is not "justified" (NPPF, paragraph 36).	
PSIIA-43	Brentwood Borough Council	General comment	Brentwood Borough Council (BBC) acknowledges the publication of the accompanying Pre-Submission Integrated Impact Assessment (IIA, 2025). BBC has no specific comments to make regarding the legal compliance of these documents or their conclusions.	Comment noted.

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PSIIA-13	Wates Developments and Hammonds Estates LLP	Sustainability Appraisal	As site promoter of Site 16a East Chelmsford Garden Community (Hammonds Farm) Wates Development and Hammonds Estates LLP support the evidence provided by the Council's IIA. As referenced in our representations on the Spatial Strategy, the selection of the Spatial Strategy set out in Policy S7 is underpinned by the Council's Sustainability Appraisal (part of the Integrated Impact Assessment), which as directed by Section 19(5) of the Planning and Compulsory Purchase Act 2004, has guided the selection and development of policies and proposals in terms of their potential social, environmental and economic effects. The IIA is a thorough study, making full assessment of policies and alternatives considered. This Sustainability Appraisal makes reference to the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment Regulations') and there is no reason to assume these are not fully met. The preparation of the Local Plan Review and the Spatial Strategy thus fulfils the NPPF Paragraph 32 requirements relating to sustainability appraisal, as well as the soundness test that requires a plan to demonstrate that it is an appropriate strategy, when considered against reasonable alternatives, to be considered justified. Our analysis of the authority's steps below in preparing the Spatial Strategy and assessing the effects of its policies, suggests that the Local Plan meets the NPPF tests of soundness: Consultation on a Scoping process for the SA has been carried out, and it provides responses to representations made at each stage. The I&O stage SA assessed the five spatial approaches against the sustainability objectives, referring to the use of the council's evidence base. The Preferred Option stage SA tested the environmental effects of the selected Spatial Strategy, comparing these to effects from the alternatives tested at Issues and Options stage, and set out reasons for the selection of the Spatial Strategy. This indicated that the	Comments and support for IIA noted.

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			Preferred Option was an evolved hybrid of the I&O options based on further evidence work prepared. The Pre-Submission stage SA set out analysis of further variations to the Spatial Strategy, both in spatial terms by examining alternative locations for a large strategic scale development, as well as quantitative variations in the level of housing provision. We note the increase in the committed development position at North-East Chelmsford from 3,000 homes allocated in the adopted Local Plan, to 6,250 homes in the Local Plan Review due to the full quantum spanning plan periods receiving approval at masterplan stage and included in outline planning application proposals. This growth represents a significant expansion of North East Chelmsford during this plan period, and a change in the baseline since the Issues and Options consultation, so we read the progression of the options on this basis. The sites allocated in the Local Plan Review have been selected on the basis of appropriate evidence, noting the NPPF requirement for plan-making evidence to be “adequate and proportionate, focused tightly on supporting and justifying the policies concerned” (Paragraph 31). The site allocations are consistent with the Spatial Strategy, which we believe represents a logical approach to sustainable development by continuing the adopted Spatial Strategy. Our review of the successive stages of plan-making, including the preparation of an extensive evidence base and Integrated Impact Assessment that underpin it, suggest that the Spatial Strategy meets the NPPF tests of soundness and has had full regard to the legal requirements for plan-making. East Chelmsford Grden Community (Hammonds Farm) as a sustainable location. The Integrated Impact Assessment of Local Plan Review provides in our view a careful consideration of the sustainability issues associated with Strategic Growth Site 16a (Hammonds Farm), which is considered to deliver major benefits in comparison to an	

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			aggregation of smaller-scale sites, and to outperform the other Reasonable Alternative options – as assessed in Table 6.5 of the IIA (p.183). We agree with this finding. Within Appendix G, the Appraisal of the Site Allocations assesses the following aspects of the site. We agree with the findings, and believe they underpin the Hammonds Farm site's clear credentials as a sustainable location: Significant positive effects recorded for Housing, Economy, Sustainable Living and Revitalisation and Health and Wellbeing, recognising the benefits the site's delivery of mixed land uses and the provision of community and green infrastructure, open space, health facilities, leisure facilities and walking/cycling links brings. This reflects the project vision and its focus on family and community success, safety and wellbeing, especially for women and girls. Significant positive and/or minor negative effects for Transport, reflecting the significant opportunities of the site to connect meaningfully to established infrastructure and embed sustainable modes of travel into everyday journeys and behaviours, whilst recognising the need to manage traffic through infrastructure mitigation. Potential effects on Cultural Heritage and Landscape and Townscape, which are acknowledged as being capable of being mitigated by policy requirements that can mitigate the landscape/visual and heritage impacts of the development. Potential effects on Water and Flood Risk due to the presence of water courses and Flood Zones 2 and 3, which again can be mitigated through design solutions, and are suitably controlled by specific masterplanning principles and policy requirements. Potential impacts on biodiversity, which again can be mitigated through policies requiring landscape buffers to the development edges and Local Wildlife sites.	

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			We support the finding of the IIA that the location of Site 16a to the east of Chelmsford benefits from proximity to Chelmsford's rail infrastructure including the new Beaulieu Park station, and can utilise the East Chelmsford Green Wedge for active, multi-functional routes into Chelmsford. The site co-locates housing, employment, community infrastructure and amenities in a manner that encourages self-containment, high levels of accessibility and has opportunities for new sustainable transport provision and active travel connectivity, helping to avoid longer journeys by car. The location supports delivery of an onsite secondary school, as well as primary schools, and employment that will be accessible by public transport by the wider communities of East Chelmsford. It is therefore a sustainable location. Alternative Sites We agree with the IIA's narrative on the selection of the preferred approach, and the rejection of alternatives, and consider that this is well articulated in paragraphs 6.4.46 to 6.4.53 of the IIA. We agree that the Council's evidence base supports its findings that potential alternative development at Chatham Green, West and North West Chelmsford, and Howe Green and Rettendon Common would not achieve the same level of sustainability benefits as Hammonds Farm, especially in respect of Objective 4 (Sustainable Living and Revitalisation) and Objective 6 (Transport), due to their lower proximity to established sustainable infrastructure connections; limited opportunities to provide new public transport connections, and the relative isolation of employment opportunities provided, with consequent reliance on use of the private car. The Council would therefore miss an opportunity to secure the sustainability objectives set out in the Pre-Submission Local Plan. At this stage of testing, all of the Reasonable Alternatives / Spatial Strategy Options defined in the IIA benefit from the potential scale opportunities of a single strategic site, eg self-containment, co-location of housing, employment, community amenities and mixed communities. This appraisal therefore robustly tests a like-for-like	

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			situation, and the sites' respective geographical comparative advantages. The inclusion of Appendix M in the Reg 19 IIA offers an assessment of all SHELAA Sites: Methodology And Outputs (IIA p.788), and this is helpful in demonstrating how all sites which are captured within the SHELAA have been subject to GIS analysis against the fourteen IIA Objectives, in addition to the many layers of evidence base that support the Local Plan and as a result it can be agreed that an equal appraisal of all proposal sites has been undertaken. The result of this appraisal finds clearly that the Pre-Submission Local Plan Review, including the Hammonds Farm site as Site 16a, is justified and supported by appropriate evidence.	
PSIIA-8	National Trust	Appendix F Appraisal of development requirements & the proposed spatial strategy	The National Trust supports a plan led approach to new development. We acknowledge the Spatial Strategy set out in the Pre-Submission Local Plan in order to meet an identified housing need. It is noted that East Chelmsford Garden Community (Hammonds Farm) is identified as a Strategic Growth Site for around 3,000 homes within the plan period and with capacity for a further 1,500 homes beyond 2041, along with infrastructure including an on-site new country park and significant new multi-functional green infrastructure. Strategic Growth Policy Site 13 Danbury is identified for 100 homes within the plan period. Blake's Wood and Lingwood Common (located to the north of Danbury) together with Danbury Common (located to the south of Danbury) are designated as Sites of Special Scientific Interest and are owned and managed by the National Trust. The sites are woodland areas with some visitor infrastructure. Taken as a whole the mosaic of habitats across Danbury Ridge including the National Trust sites, Essex Wildlife Trust Nature Reserves, and other land including ancient woodland and woodlands in private ownership not accessible to the public, is an important landscape for wildlife which is more than the sum of its parts.	Concerns relating to potential indirect impacts on SSSIs associated with the proposed developed at Hammonds Farm are noted. The IIA recognises that there is the potential for impacts on the SSSI and takes into account mitigation provided through policy development and Duty to Cooperate engagement between the Council and Natural England as evidenced in a Statement of Common Ground. Natural England has been a statutory consultee, throughout the plan preparation process, including the selection and refinement of proposed strategic allocations. Appropriate mitigation has been determined through the site allocation policy and wider supporting policies. No change to the IIA.

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			We are concerned, that the new country park is proposed on the western part of Hammonds Farm, by the corresponding the proximity of the new residential areas to Danbury Ridge, and the eastern green links which will be made through to the wider landscape which could indirectly impact the SSSIs through cumulative recreational pressure without appropriate mitigation measures. New residential development in Danbury village would be in proximity to the Danbury SSSIs. Whilst Natural England assessed Danbury Common in 2018 as being at low risk of pressure from recreational disturbance, habitat impacts are apparent on site. There has been considerable growth in and around Chelmsford in the intervening years, the pandemic has changed how people interact with the outdoors, and further growth is due to take place across the plan period. The Integrated Impact Assessment (IIA007) high-level assessment of the plan states under the Biodiversity and geodiversity heading, consideration for several matters including Housing delivery, Spatial Strategy, and Policy S6 Housing and Employment Requirements there are unlikely to be direct effects on [designated sites] but that there could be indirect effects including from increased recreational activity. The scoring indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed in the colour used. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect. The Trust welcomes the new Site masterplanning principle for Hammonds Farm to provide necessary mitigation to address the cumulative recreational pressure on SSSIs in proximity to the site, and for the Danbury sites to contribute towards addressing cumulative recreational pressure on the SSSIs. However, the Trust considers currently there is insufficient evidence to demonstrate the Plan would not have an adverse and unacceptable impact on SSSIs contrary to Paragraphs 187, 188 and 192 of the National Planning Policy Framework as set out below. We consider impacts on SSSIs and Ancient Woodlands should be	

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			assessed at the Local Plan stage and scale, rather than for individual planning applications, so that cumulative impacts for the plan period can be adequately assessed and appropriate mitigation can be ensured. We would welcome discussion with the Council around recognising the Danbury Ridge area holistically, in order to ensure the new Local Plan can effectively preserve and enhance this landscape, whilst accommodating necessary growth and improving access to nature for its communities.	
PSIIA-2	Martin Grant Homes	Section 6.4	2.28. Para 6.4.11 of the Integrated Impact Assessment (IIA) states: In response to the consultation on the Preferred Options, the Council received approaches from Castle Point Borough Council and Southend on Sea City Council, and following the consultation, an approach from Basildon Borough Council, requesting that Chelmsford help to meet unmet housing need through its Local Plan allocations. 2.29. No specific detail is provided as to what the level of need Chelmsford has been requested to accommodate, or any assessment as to the total level of unmet needs across the region. This should be established. On this basis, there is a scenario for the Plan seeking to deliver a housing requirement above minimum housing needs figure, subject to the provisions of Para 11 b). 2.33. This growth scenario is not considered in the IIA, not being considered a reasonable alternative on the basis there is "no capacity in Chelmsford's proposed Spatial Strategy to accommodate any unmet housing need from neighbouring or nearby local authorities". 2.34. The IIA considers a scenario of 1,406 dwellings per annum (which is below minimum housing needs under the December 2024 standard method) but assesses this on the basis of a particular selection of strategic-scale sites only. The scenario is discounted on the basis of these sites, rather than the quantum	The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process and has demonstrated that it can meet its development requirements as set out in Policy S7. This approach accords with the evidence base. As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that: - Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds. - An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan, is not a "reasonable alternative".

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			of growth. 2.35. There is likely a different make-up of sites forming a 'high growth' scenario which could result in a suitable spatial strategy which accommodates minimum housing needs and (if feasible) unmet needs. Against some of the strategic priorities, i.e. housing, investment, health and wellbeing, etc.. this could lead to gains above the Council's preferred option. 2.36. The discounting of a 'high growth' scenario based on consideration of one selection of sites only is not justified. 2.37. Other suitable sites of a range of sizes have been identified through the Council's evidence base which could, together, be a reasonable alternative spatial strategy to be tested as part of a 'high growth' scenario. 2.38. Additionally, the conclusion of the IIA which state the high growth scenario would "perform more poorly overall" due to "uncertainty overall such as potential oversupply of housing in the plan period disrupting co-ordinated delivery against identified need", are wholly unjustified. There is no evidence that achievement of the minimum housing need figure would have any "disruption" effect. 2.39. Whilst the Plan benefits from the transitional arrangements of the NPPF 2024, this does not override the need for the Plan to be sound including "providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs". As it stands, the Council has not justified its position as to why the higher growth scenario cannot be accommodated. The Council should be looking to achieve this where possible, and to discount this on the basis it could "disrupt" delivery is wholly flawed.	- The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process." A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA. As noted in the IIA analysis (p.190) whilst Option 3 would meet the full needs identified through the revised Standard Method (1,406 dwellings per annum) and is therefore also identified as having the potential for a long-term significant positive effect. The housing delivery rates over the past 10 years have been in the order of 1,000 dwellings per annum. Whilst the provision of a quantum of housing beyond the transitional need is likely to provide additional flexibility in delivery and choice of tenure, over-delivery could be disruptive to the local housing market with demand failing to match supply and potentially stalled developments. As a result, there is an element of uncertainty in relation to Option 3. Thus the identification of uncertainty reflects a reasonable concern that growth would disrupt the chosen plan approach in respect of transitional growth. No change to the IIA.

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PSIIA-9	Vistry Group	Section 6.4.30	3. Although tasked with providing an assessment of any reasonable alternatives, the IIA has not considered the opportunities that a Green Belt Review would present to deliver meet the Council's Strategic Priorities and deliver sustainable development in Chelmsford. In Section 6.4.30 of the IIA for the Pre-Submission Local Plan, when considering reasonable alternatives, WSP explain: "It was determined that site options which are situated within the Metropolitan Green Belt and Green Wedge would not be taken forward as part of any spatial strategy options to help meet any residual needs. This is primarily because there are sufficient and suitable site options outside of the Green Belt and Green Wedge to meet residual needs. The Government has continued to reaffirm the protection of the Green Belt in recent Ministerial Statements. The extent of the Green Belt is already established and the detailed Green Belt boundaries for Chelmsford were confirmed through the Council's Adopted Local Plan 2020. The Council is committed to protecting the Green Belt as it provides the strongest possible planning policy to prevent the encroachment of urban growth into open undeveloped areas and the coalescence of existing built-up areas. In accordance with the national planning policy outlined above, to vary the Green Belt boundaries would require exceptional circumstances which would need to be clearly evidenced" 4. In response to previous representations on the IIA which highlight its deficiencies in not considering the reasonable alternative of a Green Belt Review, WSP state on page 297 of the IIA for the Pre-Submission Local Plan: "A Green Belt Review has not been completed as part of the Local Plan Review, reflecting the spatial principle of Protecting the Green Belt. The IIA considers spatial approaches which have been prepared as part of taking into account the spatial principle of not amending Green Belt boundaries as part of the Local Plan Review. Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected. In this context, the IIA has considered reasonable options (i.e. those which have been developed in light of available evidence,	Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected. The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process and can meet its development requirements without needing to undertake a Green Wedge review. This approach accords with the evidence base. No change to the IIA.

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			spatial planning requirements and plan strategy). No change to the IIA." 5. On page 299, WSP add: "The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Preferred Options Consultation Document presents a range of sites at various spatial scales which are considered to be capable of meeting the identified development requirements." 6. Whilst we acknowledge that the existence of 'exceptional circumstances' is ultimately a policy matter down to the Council to determine, we disagree with WSP that is not necessary for the IIA to consider the reasonable alternative of a Green Belt Review. Rather than being guided by a "policy on" approach from the outset, the IIA should have been used as a tool to provide an objective view on whether a Green Belt Review would help the Council best meet its Strategic Priorities and deliver sustainable development in Chelmsford over the plan period. 7. Vistry (and others) have highlighted the sustainability benefits of undertaking a Green Belt Review throughout the plan making process. A number of the benefits are presented in Vistry's representations on Strategic Policies S1 and S7, but in summary include: • In the context of a housing crisis, providing must needed housing in parts of the administrative area that have not experienced any significant growth for a considerable period and, in locations such as Writtle, are experiencing population decline; • To allow more sustainable growth options in close proximity to the City Centre and large employment sites to the south of the City to come forward; and • To secure investment in infrastructure and local communities to the south-west of the City, notably developer led interventions to mitigate the risk of flooding in the City Centre.	

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			8. The sustainability benefits of a Green Belt Review are multiple and substantial. In our view, the reasonable alternative of Green Belt Review was not a left field option that need not be assessed (as implied by WSP). As demonstrated by Vistry's representations on Strategic Policy S1, a significant number of other authorities who have similar proportions of Green Belt and non-Green Belt land have amended Green Belt boundaries as part of an appropriate strategy to secure the most sustainable pattern of development. A Green Belt Review should have been properly considered in Chelmsford from the outset and appropriately assessed through the IIA as part of the Local Plan preparation in order to demonstrate that the Plan is 'justified'.	
PSIIA-9	Vistry Group	Section 6.4.30	9. In addition to the above, we wish to highlight errors made in the Assessment of SHELAA Sites (Appendix M of the IIA) with respect to two sites promoted by Vistry; 21SHELAA97 (land south of Writtle), and 21SHELAA98 (land at Skeggs Farm). 10. The assessment identifies that 21SHELAA98 is within 100m of a Local Nature Reserve (LNR) and the site is scored Red in this category. A review of Chelmsford City Council's Interactive Planning Policy Map confirms this is not the case. The nearest LNR is well beyond 800m and therefore the site should be reassessed as Green in this category. 11. Both 21SHELAA97 and 21SHELAA98 have been assessed as Red for proximity to primary school; indicating that the nearest primary school is greater than 3.2km from the site. This is incorrect. Primary education in Writtle is covered by Infant and Junior Schools which are based on the same site. This school site is within 1km of both 21SHELAA97 and 21SHELAA98 and they should therefore be reassessed as Green. 12. Both sites have been assessed as Red for distance to rivers (<10m) and presence of flood zone 3. Whilst this may be correct, it is important to note that no development is proposed within flood	Scoring suggestions noted which will be reviewed.

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			zones 2 and 3. The proposed site boundaries could have been drawn to exclude such zones, however a key benefit of the proposal is that opportunities have been identified to incorporate a range of natural flood management techniques to help address the risk of flooding to the City Centre.	
PSIIA-49	Natural England	General	We agree with the Biodiversity and Green Infrastructure key sustainability issues although note that biodiversity net gain is mandatory for all developments (with certain exceptions) and will be mandatory for Nationally Significant Infrastructure Projects in November 2025 Biodiversity net gain - GOV.UK (www.gov.uk). We agree with the Land Use, Geology and Soils key sustainability issues although note that previously developed land may have biodiversity (invertebrate) interest which needs to be taken into account by development. We agree with the Landscape and Townscape key sustainability issues. We support the criteria to test the plan's policies and proposals for negative impacts on European sites, SSSIs local sites, ancient woodland etc. We are happy with the criterion to conserve and enhance the Marine Conservation Zone under Objective 14. Landscape and Townscape. However, we suggest that the following wording is added to Objective 1. Biodiversity and Geodiversity: Will it preserve and enhance the local marine environment through the Blackwater, Crouch, Roach and Colne Estuary Marine Conservation Zone (MCZ)?' We note the conclusion that there are mixed positive and negative effects in respect of biodiversity and land use (section 8.2.8) and we agree that 'There will be pressures on biodiversity, land use, resource use and climate change, challenging policy and site-specific proposals to employ best practice sustainable measures' (section 8.2.9). We support the conclusion that 'The uncertainties and negative effects recorded emphasise the importance of the monitoring of the performance of sustainability indicators to help implement mitigation measures which would help improve the performance of all approaches, notably in respect of air quality,	Comments on and support for the IIA are noted. Suggestions for additional wording to Objective 1 are noted. However, the IIA has been subject to multiple rounds of consultation without suggestions of additional specificity for guide questions. No change to the IIA.

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			biodiversity, climate change and health and well-being' (section 8.2.11). We support the proposed IIA monitoring indicators for objectives 1, 7 and 14.	
PSIIA-25	Wates Developments Limited	6.4.25	In our previous Regulation 18 submissions, we highlighted concerns in relation to the lack of an assessment of growth at Boreham as a spatial option and the general consistency of approach taken in relation to the SHELAA assessment of Site CFS 52. Wates are again disappointed, that the Sustainability Appraisal (SA) and the Integrated Impact Assessment (IIA) have continued to progress a spatial strategy which does not include any residential growth at Boreham, despite its status as a KSS and its proximity to other major residential and employment allocations, east of Chelmsford. Wates notes that an Integrated Impact Assessment (IIA) has been prepared, which has tested all 383 sites contained in the SHELAA against a range of individual assessment criteria. Whilst it is noted that the IIA has assessed a number of site proposals in Boreham, including Sites CFS 52 and CFS 145, these have all been tested on an individual basis and there has been no assessment of a wider strategy that includes Boreham as a growth location in principle. The question therefore remains as to why Boreham, as a Key Service Settlement (KSS), is ranked as a suitable and sustainable location for strategic employment growth, but is still excluded from further new housing growth, even when housing needs have materially increased under the new standard method.	Site options, including scales of development, were considered against SHELAA and IIA criteria. Boreham has not been selected to receive housing allocations as part of this Local Plan. However, there is one new employment site allocation (9a). No change to the IIA.
PSIIA-47	Rochford District Council (RDC)	General comment	RDC acknowledges the publication of the accompanying Pre-Submission Integrated Impact Assessment (2025). RDC has no specific comments to make regarding the legal compliance of these documents or their conclusions.	Comment noted. No change to the IIA.
PSIIA-55	Hallam Land Management (HLM)	Reasonable Alternatives	5.1 HLM is supportive of the continued development and growth at Chelmsford Garden Community (draft Local Plan Policy SGS 6), with that development being led by Ptarmigan Land, Countryside,	Support for the IIA in respect of the Chelmsford Garden Community is noted.

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			L&G and Halley Developments, as a continuation of previous delivery known as Beaulieu and Channels. 5.2 Consistent with the spatial strategy of the draft Local Plan, but necessary to address matters of soundness identified above, there is opportunity for residential led development (in the order of 1,250 – 1,500 homes dwellings) on land to the north of Wheelers Hill (the Site). This would enable the further expansion of Chelmsford Garden Community with its proven: • achievability through effective working arrangements with a limited number of landowners – in this instance there would be a single landowner across the Site; • planning of significant infrastructure; and • positive sustainable effects across social, environmental and economic objectives. 5.3 Where future residential development on the Site should be recognised, if not allocated in the draft Local Plan at this stage, then other modifications should be made to SGS Policy 6 (Chelmsford Garden Community) to (at the very least) require the masterplanning of the allocation to identify / highlight where future growth to the north of the Site should come forwards. To continue the sustainable principles of Chelmsford Garden Community, this area of future growth should be identified on the Key Diagram (Figure 14) and the 'Growth Area 2 – North Chelmsford' inset map (Figure 17) of the draft Local Plan. 5.4 A Concept Strategy for the Site has been prepared by Hallam Land (Appendix B), which provides a general approach of how development on the Site could be arranged. This includes: • the continuation of built development beyond (to the north of) Wheelers Hill for 1,250 – 1,500 homes dwellings; • principal access to the Site via the new Northern Radial Distributor Road being delivered by committed development at Chelmsford Garden Community; • new local facilities – including local centre with retail and community uses, multimodal travel hub and pre- and primary school provision;	The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process and has demonstrated that it can meet its development requirements as set out in Policy S7. This approach accords with the evidence base. As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that: - Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds. - An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan, is not a "reasonable alternative". - The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process." A range of development quanta, broad distributions of development and site options available have been tested

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			• opportunity to route bus services through the centre of the Site; • a network of active travel links providing connections south to other part of Chelmsford Garden Community, west to Little Waltham and Broomfield, and east to connect to a wider public right of way network. This would allow for direct and quick access to Beaulieu railway station, park and ride facilities, and employment opportunities whether within Chelmsford Garden Community, Chelmsford itself or other towns and cities; • a substantial network of green infrastructure, integrated with other areas of Chelmsford Garden Community and the restoration of Sheepcotes Quarry to the north. This would provide significant leisure, recreation and sporting opportunities, as well as space for nature and a net gain in biodiversity. 5.5 To the north of the Site, the Concept Strategy shows how natural landscape features including Sheepcotes Wood and Titelands Wood would robustly contain the built form / expanded area of growth in this more sensitive direction. To the east, development would be contained by the alignment and realisation of the CNEB. 5.6 The Site is well-placed to coordinate with the four-stage delivery programme for the Chelmsford Garden Community, as set out in the Development Framework Document. This envisages the first stage of development being delivered by 2030 in the northern extent of the allocation that would see residential development, the Northern Radial Distributer Road, Channels Discovery Park and Sports Hub alongside education, healthcare and service provision. 5.7 Despite the Council acknowledging in its Strategic Housing Employment Land Availability Assessment (SHELAA) that development on the Site is achievable, and where there is clear opportunity to provide new local services and expand bus services from the adjacent Chelmsford Garden Community, the Council has not considered the Site in the IIA as a reasonable alternative for development. 5.8 Hallam Land however considers that had this process been carried out, it should have scored the Site highly against sustainable objectives, in a similar way to how draft Local Plan Policy SGS Policy 6 (allocating growth at Chelmsford garden	through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA. Options for development over the following plan period will be considered as part of the preparation of a new Local Plan. No change to the IIA.

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			Community) has been assessed by the IIA, effectively as a 'sustainability appraisal' of the environmental, social and economic performance of the allocation. As presented at Table 1 (see attachment), many significant positive effects of development are identified, with weaker scoring including on loss of agricultural land, water usage and landscape considered unavoidable when having to provide for housing needs. 5.9 Hallam Land considers the IIA to demonstrate the positive overall sustainability of strategic growth at Chelmsford Garden Community promoted by the draft Local Plan, consistent with the success the Council has had in delivering its initial phases. The IIA also justifies and reinforces the opportunity of the Site (of land north of Wheeler Hill) to expand that growth further, as highlighted by these representations above.	
PSIIA-54	Miss Hanneke Redeker	Table 5.10 and Appendix G	I feel the plan is unsound and object for the following reasons. 1. The proposed access to the site (Barbrook Way) is not suitable for the type of construction vehicles that would be used. The road itself is in a state of disrepair with steel reinforcement rods exposed and the road itself is crumbling in many areas. The road itself is used by local children as a play area and this type of traffic would present a very dangerous situation. 2. The traffic through the village is at an all time high with gridlock at times around the old Paul Bailey roundabout area. There has already been a serious accident in recent weeks with accidents in the vicinity of the former Paul Bailey site a daily occurrance. The roads around Bicknacre are dangerous at times with speeding drivers using the village as a rat run. The councils own Integrated Impact Assessment report carried out by WSP casts serious doubts on the proposed sites. My local MP John Whittingdale is strongly opposed to the development as is the Parish Council. The local doctors surgery (Wyncroft Surgery) is at full capacity and appointments are hard to come by and often require travel to South	Objection to Barbrook Way (Site 11c) is noted. The IIA Report assessed the option across a range of criteria, including potential traffic implications. The logic of the relationship between the options presented in the Issues and Options Document, the Preferred Options and the Pre-Submission Consultation Document is explained in the latter document, reflecting the availability of additional evidence base work and the consideration of the mix of spatial options which can meet housing and employment requirements. No change to the IIA.

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			Woodham Ferrers.	
PSIIA-30	Mr Alan Roche	General comment	Failure to Provide Sufficient Evidence The legal compliance of the Local Plan is severely compromised by insufficient evidence regarding key elements, including transport infrastructure, economic justification, and heritage impact. Transport Infrastructure Concerns Chelmsford City Council's (CCC) Integrated Impact Assessment (p. 72) acknowledges that Pigeon Industrial Complex is located adjacent to already congested transport corridors: the A12 and A414. These roads are already under significant strain. However, the Local Plan provides no formal transport solutions or verified mitigation plans. The absence of a comprehensive transport strategy means that the additional traffic generated by the proposed expansion remains unaddressed. This omission directly contravenes NPPF Paragraph 32, which requires that transport impacts be adequately assessed before site allocations are made. The failure to engage with Essex County Council and National Highways for formal transport consultations further exacerbates this problem, violating the Duty to Cooperate as outlined in NPPF Paragraph 26. *[Integrated Impact Assessment, Chelmsford City Council, p. 72]*	The role of the IIA is to present an assessment of likely effects and opportunities for their mitigation. Site- and topic-specific policies have been drafted to take account of the IIA where appropriate, aimed at helping to enhance their overall sustainability performance. Matters associated with potential traffic congestion are noted in the IIA, based on technical evidence available at the time of assessment and to be subject to further detailed scrutiny. Traffic issues are identified in the IIA as matters of concern. Transport is recorded as a Significant Positive/Minor Negative, reflecting traffic generation but the requirement of the site-specific policy is for measures to enable travel by sustainable modes (including walking and cycling) and improvements to the local road network (supported by a traffic management strategy). No change to the IIA.
PSIIA-29	Mr Alan Roche	General comment	Failure to Provide Sufficient Evidence The legal compliance of the Local Plan is compromised due to insufficient evidence supporting the allocation of Hammonds Farm. Chelmsford City Council (CCC) has failed to adequately substantiate key elements, especially regarding transport infrastructure, flood risk, and heritage impact. According to CCC's own documents, such as the Integrated Impact Assessment (p. 72), there is an acknowledgment of traffic congestion along the A414 and A12, but no formal transport strategy has been provided to demonstrate how these issues will be addressed. This is a critical issue because the NPPF (Paragraph 32) requires that all transport impacts be appropriately	Matters associated with potential flood risk and traffic congestion are noted in the IIA, based on technical evidence available at the time of assessment and to be subject to further detailed scrutiny. Flood risk and traffic issues are identified in the IIA as matters of concern. Transport is recorded as a Significant Positive/Minor Negative, reflecting traffic generation but the requirement of the site-specific policy is for measures to enable travel by sustainable modes (including walking and cycling) and improvements to the local road network (supported by a traffic management strategy).

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			considered in plans. This requirement is essential for positively preparing a plan that ensures effective delivery of infrastructure. The lack of such a strategy directly violates the legal standard for soundness as laid out in NPPF Paragraph 35. *[Integrated Impact Assessment, Chelmsford City Council, p. 72]* The flood risk at Hammonds Farm is also acknowledged in the Chelmsford Level 1 SFRA (p. 112), yet CCC has not provided sufficient evidence that these risks have been mitigated or adequately assessed. Natural England was not consulted on this, and flood mitigation strategies have not been presented in a way that complies with the Sequential and Exception Tests under NPPF (Paragraphs 160-165). The lack of a detailed flood risk assessment represents a serious gap in the evidence base of the Local Plan, further undermining its compliance with national planning policy and casting doubt on the soundness of the plan. *[Chelmsford Level 1 SFRA, Chelmsford City Council, p. 112]* Additionally, the Heritage Assessment for Hammonds Farm (2024, p. 4) highlights significant concerns about the impact on heritage assets, yet CCC has not demonstrated how these concerns will be mitigated, failing to consult Historic England adequately. As required by NPPF Paragraph 189, heritage impact assessments must demonstrate how proposals conserve and enhance heritage assets, which CCC has failed to do for Hammonds Farm. *[Heritage Assessment for Hammonds Farm, 2024, p. 4]*	The Council's assessment of the proposed allocation states: "*The site will accommodate a new Garden Community for housing and employment development, a country park, areas for SUDS, biodiversity and recreation, and provide active and sustainable modes of transport to key destinations. Complies well with Strategic Priorities, Vision, Spatial Principles and Spatial Strategy in particular by providing a mixed and balanced new self-contained community. Supported by the Plan evidence base e.g. Heritage Assessment 2024. There are no overriding constraints that would hinder the delivery of the site which will significantly contribute to housing and employment supply. It is viable and available with no overriding physical constraints to bringing forward the allocation in this location."* STRATEGIC GROWTH SITE POLICY 16a – EAST CHELMSFORDGARDEN COMMUNITY (HAMMONDS FARM) sets out in detail a range of mitigation measures covering movement and access to and within the proposed allocation, along with the historic and natural environment. The Environment Agency, Natural England and Historic England are all statutory consultees on the plan preparation process and have made various representations on the Local Plan and the IIA. No change to the IIA.
PSIIA-21	Weal Properties Ltd	Para 6.4.14	Spatial Strategy Options and the Green Wedge The Integrated Impact Assessment (IIA) acknowledges that to meet residential and employment needs under transitional and higher growth levels, additional site options beyond the existing Local Plan allocations will be required (paragraph 6.4.29). The IIA confirms that site options within the Metropolitan Green Belt and Green Wedge would not be considered as part of the spatial options to meet residual needs. This, it explains, is primarily because there are sufficient and suitable site options available	Comments of support are noted. Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected.

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			outside of these areas in order to meet the proposed development requirements. However, meeting development needs is not simply about fulfilling housing numbers to accommodate future growth in purely numerical terms — it is incumbent upon the plan-making process to ensure the Local Plan will do so in a sustainable manner. Case law (e.g. Calverton) confirms that a key factor in determining whether there are exceptional circumstances which justify alterations to the Green Belt is whether it is possible to meet development needs sustainably without doing so. The IIA suggests that residual housing needs can be met without using sites within the Green Wedge. However, it also notes that Chelmsford City Council has received requests from Castle Point Borough Council, Southend-on-Sea City Council, and Basildon Borough Council to help meet their unmet housing needs through Chelmsford's Local Plan allocations (paragraph 6.4.11). The IIA further states that Chelmsford's proposed Spatial Strategy has no capacity to accommodate unmet housing needs from neighbouring authorities (paragraph 6.4.14). Therefore, it would be logical and appropriate to test spatial options involving the release of land from the Green Wedge to help address this shortfall. As acknowledged in paragraph 6.4.15, even providing the full standard method assessment of 1,454 homes per annum would create capacity for some neighbouring unmet need — a scenario based on a spatial option that does not release land for housing from the Green Wedge. The IIA has therefore failed to test all reasonable alternatives. Discounting all sites within the Green Wedge without properly assessing them as reasonable alternatives makes the proposed Spatial Strategy unjustified and unsound.	The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process and can meet its development requirements without needing to undertake a Green Wedge review. This approach accords with the evidence base. The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Pre-Submission Consultation Document presents a range of sites at various spatial scales which are considered to be capable of meeting the identified development requirements. As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that: - Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds. - An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan, is not a "reasonable alternative". - The question of whether an option will achieve the objectives is also essentially a matter for the evaluative

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				judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process." No change to the IIA.
PSIIA-37	Mr Albert Clarke	Site 11b	I feel the plan is unsound and object for the following reasons. Below is taken from the councils own Integrated Impact Assessment Plan undertaken by WSP. Bicknacre 21SHELAA94 The development would result in backland development to the north of the village. When compared to the preferred sites this site compares less well with the Spatial principles and Spatial Strategy in particular by not respecting the pattern of the existing settlement of Bicknacre. It would also have poorer access and connectivity to services and facilities available in Bicknacre Village.	Objection to the Growth Site 11b at Bicknacre is noted. The IIA Report assessed the option across a range of criteria, including accessibility and connectivity to services (21SHELAA49). The logic of the relationship between the options presented in the Issues and Options Document, the Preferred Options Document and the Pre-Submission Document is explained in the latter document, reflecting the availability of additional evidence base work and the consideration of the mix of spatial options which can meet housing and employment requirements. No change to the IIA.
PSIIA-36	Mr Albert Clarke	Site 11c	I feel the plan is unsound and object for the following reasons Below is taken from the councils own Integrated Impact Assessment Plan undertaken by WSP and clearly indicates the site is unsuitable. BICKNACRE CFS158 When compared to the preferred sites this site compares less well with the special principles and Special strategy in particular by not respecting the pattern of the existing settlement of Bicknacre. This site would result in more isolated development in the countryside. It would also have poorer access and connectivity to services and facilities available in Bicknacre Village.	Objection to Growth Site 11c at Bicknacre is noted. The IIA Report assessed the option across a range of criteria, including accessibility and connectivity to services. The logic of the relationship between the options presented in the Issues and Options Document, the Preferred Options Document and the Pre-Submission Document is explained in the latter document, reflecting the availability of additional evidence base work and the consideration of the mix of spatial options which can meet housing and employment requirements.

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				No change to the IIA.
PSIIA-41	Mr Ivan Conner	Appendix G	I agree with the comments next to Bicknacre CFS158, which I understand relates to this site, in Appendix G - Appraisal of Proposed Site Allocations and Reasonable Alternatives on page 495. The site (Site 11c) should be removed from the plan.	Objection to Growth Site 11c at Bicknacre is noted. The IIA Report assessed the option across a range of criteria, including accessibility and connectivity to services. The logic of the relationship between the options presented in the Issues and Options Document, the Preferred Options Document and the Pre-Submission Document is explained in the latter document, reflecting the availability of additional evidence base work and the consideration of the mix of spatial options which can meet housing and employment requirements. No change to the IIA.
PSIIA-38	This Land Limited	Appendix D	The Integrated Impact Assessment (IIA), acknowledges that as a Key Service Settlement they have access to a good range of facilities and are located on important public transport corridors. These services may include primary schools, local employment opportunities, shops, community facilities, good public transport links, surgeries and green spaces. The IIA continues that the station and Boreham Interchange will create an important transport hub, which in turn will help stimulate investment and development in the area. Appendix D of the IIA confirms Boreham's key characteristics. However, in summary the village of Boreham has a population of approximately 4,000 people and is well served by local services and facilities. The village benefits from a primary school, village hall (and village green), a church, doctor's surgery, Co-op foodstore, 3 pubs and a parade of shops that include a post office. The village is well served by public transport, with various bus services that run along Main Road between Chelmsford, Witham, Colchester and Maldon. There are also services that loop around the village via Plantation Road / Church Road.	Comments on assessing all reasonable alternatives are noted. The IIA appraises the Local Plan Review from Issues & Options Stage through to Submission. The Local Plan Review contains reasonable alternatives as spatial, site and policy options. The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Pre-Submission Consultation Document presents a suite of sites which are considered to be capable of meeting the identified development requirements, along with reasonable alternatives. As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area.

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			To make the plan sound, the Council must reconsider is approach to the spatial strategy and the settlement hierarchy, in particular Boreham's housing growth within the spatial strategy. The lack of growth proposed for the Key Service Settlement suggests the spatial strategy is already failing, in distributing growth across the City Area. A growth target for Boreham should be ambitious to reflect the strategic housing requirement and Boreham's sustainable status as a Key Service Settlement. This will ensure that Boreham's growth is not artificially constrained and that it makes a contribution (not just an appropriate contribution) to Chelmsford's housing supply over the extended plan period. The IIA must also be updated to test growth scenarios for Boreham, ensuring all reasonable alternatives are fully assessed. Without this, the Local Plan risks being found unsound at examination and requiring significant modification.	Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that: - Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds. - An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan, is not a "reasonable alternative". - The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process." A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA. No change to the IIA.
PSIIA-51	Environment Agency	Section 3.8	Water Quality	Comment noted.

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			We are generally satisfied with the Integrated Impact Assessment section 3.8, Water. We are pleased to see there was a 2024 update to the Chelmsford Water Cycle Study. Section 3.8.9 covers the serving Water Recycling Centre (WRC) and their current capacity. We are pleased to see identification of required upgrades and revised quality permit conditions, and phasing where necessary. We would encourage communication with Anglian Water about planned upgrades, especially within the AMP8 programme (2025-2030), and reviewing their Drainage and Waste Water Management Plan (DWMP).	No change to the IIA.
PSIIA-53	Gladman Developments Ltd	Reasonable Alternatives	Gladman contend that the IIA currently fails to meet the requirements of National Policy Guidance, the 2004 Regulations and the Directive and as a result the Chelmsford Local Plan Review cannot therefore be considered an appropriate strategy for the purposes of NPPF Paragraph 36. The reasons for this view will be discussed below. Assessment of Reasonable Alternatives The assessment of reasonable alternatives has not been achieved in three ways: - Failure to sufficiently test alternative growth scenarios - Failure to sufficiently test alternative employment needs - Failure to accurately and consistently test spatial options Failure to test sufficient alternative growth scenarios The IIA has failed to test sufficiently alternative housing requirements in isolation, instead opting to test one single housing requirement of 1,240 .in order to meet the transitional arrangements. Table 5.2 outlines how this requirement performs against the assessment objectives to conclude that this requirement is suitable. Notwithstanding the lack of justification for pursuing this figure beyond it being 80% of the new standard method figure, to not test lower or higher growth scenarios is incorrect. Table 6.3 outlines the spatial strategy options and provides the total	Comments on exploring higher growth scenarios and testing alternative requirements in isolation are noted. The IIA appraises the Local Plan Review from Issues & Options Stage through to Submission. The Local Plan Review contains reasonable alternatives as spatial, site and policy options. The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Pre-Submission Consultation Document presents a suite of sites which are considered to be capable of meeting the identified development requirements, along with reasonable alternatives. As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT

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			number of dwellings each option could provide. Gladman consider this incorrect and the housing requirements should be tested in isolation, and not as part of the spatial strategy options. Rather, the IIA should have explored three growth options in isolation of the spatial strategy (as a minimum); the previous standard method figure of 913 (should the Council be pursing examination under NPPF 2023), the proposed figure of 1,210 (with appropriate justification for the uplift) or the emerging standard method figure of 1,454. Failure to do so results in the housing requirement being unjustified and undermines the IIA as a whole. Based on this, Gladman do not consider that the legal requirement has been met. Failure to test alternative employment needs As above, rather than suitably testing a low, medium and high employment needs scenario as a minimum and in isolation, the IIA has tested just one scenario in full. Rather than being incorporated as part of the spatial strategy options, Gladman consider that these alternatives must also be tested in isolation to ensure that the most sustainable option has been progressed. Failure to accurately and consistently test spatial options Gladman do not consider that sufficient assessment of the reasonable alternatives to the Hammonds Farm site have been considered therefore, there is not sufficient evidence to suggest that this is the most sustainable option when compared with other large scale strategic sites available in the area. Had further work been undertaken, Gladman contend that it would be likely evident that the Hammonds Farm allocation would not represent the most reasonable approach. The five spatial strategies that were then rolled forward in to 5 low, transition, high scenarios with limited differentiation between the sites included. Recognising that there would be a large number of potentially hybrid strategies an element of planning judgement therefore needs to be applied, Gladman contend that the hybrid	Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that: - Reasonable alternatives does not include all possible alternatives: the use of the word “reasonable” clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds. - An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”. - The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.” A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA. No change to IIA.

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			strategies should be revisited, and the exercise undertaken again. We would suggest an alternative strategy to Hammonds Farm as strategic growth at Boreham, Howe Green, East Hanningfield, Rettendon, Bicknacre and Danbury. Assessment of such a hybrid strategy should be afforded the same flexibility in terms as mitigation as that of the Hammonds Farm option. As for example, the current hybrid strategy discounts sites for highways capacity or relative isolation yet these are the exact issues that Hammonds Farm will have to address. Development of sites in these locations would provide the infrastructure required, flexibility afforded to the assessment of Hammonds Farm but in a more dispersed way so that there is less reliance on any one location to deliver the future housing growth of the Local Plan Review. There is also a lack of testing in terms of higher growth scenarios to accommodate unmet needs from neighbouring authorities, this is crucial in determining whether the duty to cooperate has been fulfilled and whether the Council have done enough to prove that they cannot assist neighbours.	
PSIIA-48	Dandara Eastern	Section 6	The approach taken by the council in order to meet the housing needs in the 2024 NPPF is set out in Section 6 of the Integrated Impact Assessment (IAA). It appears to acknowledge that planning to meet this higher growth figure is as reasonable alternative at paragraph 6.4.9 where it states: “Based on the evidence set out above, it is considered reasonable to explore alternatives for the following levels of housing growth: • Lower growth (approx. 955 dpa or 18,145 total dwellings) based on the Strategic Housing Needs Assessment (SHNA) published in 2023 and previous Standard Method. While it could be argued that this is not a reasonable alternative as it is not in line with the revised NPPF and Standard Method, it is being taking forward for further consideration as a number of representations were received from the public on the Preferred Strategy questioning the level of growth proposed in the plan. • Transitional growth (approx. 1,206 dpa or 22,990 total dwellings)	The Local Plan Review contains reasonable alternatives as spatial, site and policy options. The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Pre-Submission Consultation Document presents a suite of sites which are considered to be capable of meeting the identified development requirements, along with reasonable alternatives. As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options

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			based on the housing need identified through the revised Standard Method and transitional arrangements. • Higher growth (approx. 1,406 dpa or 26,714 dwellings) based on the full housing need identified through the revised Standard Method published for consultation in September 2024. The higher level of growth proposed through the December 2024 NPPF and Standard Method has not been considered further at this stage as it was not available in sufficient time for consideration through this report." (Emphasis added). The emphasised text above appears to confirm that the housing requirement generated by the 2024 NPPF and its accompanying Standard Method is a reasonable alternative, but at the same time admit it has not been assessed. Notwithstanding the above and the commentary within the IIA at paragraph 6.4.9., we note that the IIA has assessed a higher growth scenario, albeit in the context of options for the spatial strategy, Spatial Strategy Option 3.	considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that: - Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds. - An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan, is not a "reasonable alternative". - The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process." A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA. No change to IIA.
PSIIA-45	Mrs Joanne Britter	Appendix G and M	I believe that the site is not legally compliant and it is unsound because it goes against the Integrated Impact Assessment produced for the Local Plan Review.	The objection to Growth Site 11c at Bicknacre is noted.

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			• Please refer to page 495, Appendix G - Appraisal of Proposed Site Allocation and Reasonable Alternatives. The findings list that the site complies less well with the Spatial Principles and Spatial Strategy. • Please refer to page 851, Appendix M - Assessment of SHELAA Sites: Mythology and Outputs. The site NLUD REFERENCE CFS158, OBJECTID 379 has been listed as 'green' for distance to a secondary school. The nearest school is approximately 7.5km away and although there is a school bus within 1km of the proposed site, it is not free to all the village and seats are limited. Therefore, I feel that the measurement of 'green' is unsound and does not convey the entire situation. • Please refer to pages 860 and 872, Appendix M - Assessment of SHELAA Sites: Mythology and Outputs. The same site mentioned above (379) is listed 'green' for Presence of Flood Zone and Presence of Flood Risk Area, yet a site which is just one road away OBJECTID 150, NLUD REFERENCE 15SLAA43 is listed as 'amber' for the presence of Flood Zone. Even if the data has come from a government website I do feel that a full assessment of site CFS158 is required. I therefore respectively request that this site be removed from the Local Plan since there are many discrepancies in both the Integrated Impact Assessment paperwork and the SHELAA document which are outlined in one of my other objection emails.	The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The discounting of options at an early stage based on available evidence is a Council-led process. The Pre-Submission Local Plan presents a range of sites at various spatial scales which are considered to be capable of best meeting the identified development requirements. No change to the IIA.
PSIIA-46	Mrs Joanne Britter	Table NTS1	The inclusion of the above site is unsound because the Integrated Impact Assessment document produced by WSP has some very confusing criteria and key but if my understanding of the document is correct then I believe some of the statistics are wrong. Assessment Objective 1 - Biodiversity already shows that the site is uncertain for fostering growth and investment and providing new jobs. I do not see how 20 houses will foster investment and provide new growth other than in the short term when it provides some work for the building contractors. Assessment Objective 3 - Economy has a neutral score of 0.	The objection to Growth Site 11c at Bicknacre is noted. The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The discounting of options at an early stage based on available evidence is a Council-led process. The Pre-Submission Local Plan presents a range of sites at various spatial scales which are considered to be capable of best meeting the identified development requirements.

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			According to the matrix and the key it means it is neutral for promoting smart active travel and sustainable transport. I consider that the site is actually incompatible for this objective. Assessment Objective 6 has a transport scoring of ? Which means uncertain. I believe again that this scoring should be incompatible as the site does not reduce the need for travel or promote more sustainable modes of transport. Assessment Objectives 8, 9 and 10 have all scored a 0 which again means neutral. The flood risk is certainly not neutral. There is already flooding in the fields ,neighbouring gardens which is leading to subsidence of some properties. This is certainly not neutral. Assessment Objectives 11 and 14 already highlight that the proposed building on this piece of land is incompatible with cultural heritage and landscaping. I agree with these points. With the above assessment of objectives 13 and 14, along with what I consider errors with the other assessment objectives I politely ask that the above site be removed from the local plan.	No change to the IIA.
PSIIA-23	Mrs R Armstrong and Mr B Howard, Ms Becky Armstrong	Para 6.4.11	Utilising a settlement hierarchy to guide the distribution of development within the administrative area is deemed a logical and conventional approach, which has been successfully employed in the preparation of numerous sound Local Plans in recent years. This method can be a valuable tool for ensuring sustainable distribution of development, although it is crucial that its application to policies and allocation should not be overly simplistic and should account for broader sustainability considerations. We support the designation of Roxwell as a Service Settlement. Service Settlements have more limited services and facilities but typically include primary schools, convenience shopping facilities and community facilities making them suitable for a more limited scale of development. Although we agree with the use of a settlement hierarchy to inform decisions regarding the scale of growth directed to various settlements within the borough, the current wording of the policy text makes it unclear how the settlement hierarchy outlined in	Comments on re-wording of Strategic Policy 7 are noted. Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected. No change to IIA.

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			Strategic Policy S7 is to be utilized by decision-makers. The IIA has therefore failed to test all reasonable alternatives. Discounting all sites within the Green Belt without properly assessing them as reasonable alternatives makes the proposed Spatial Strategy unjustified and unsound.	
PSIIA-22	Ms Katherine Jennings	Site 16a	With respect to the allocation of land at East of Chelmsford - Hammonds Farm (Site 16a) I strongly object to this strategic allocation. The concentration of the majority of the housing allocated in this area has not been fully or fairly examined against other more spatial options adding to the Chelmsford City boundary within the Green Belt and to existing towns and villages including those within the Green Belt. It creates a dispersed settlement that is not cohesive with the existing city settlement or surrounding settlements. This site was considered under the previous local plan process leading to the adoption of the 2020 Local Plan. This site was at that time discounted in favour of alternative sites to the north and west of Chelmsford which the Council considered exhibited better performance in respect of landscape, historic environment, flood risk, traffic generation and local road congestion. It is considered that the Council have not provided any justification to make a departure from the above consideration in the previous IAA. In particular the evidence in relation to traffic assessments is poor as significant investment is required to make this site sustainable given it is remote from the city centre and existing transport links. The evidence provided in relation to the capacity of the Boreham Interchange which will be subject to Hammonds Farm traffic accessing services and importantly the new rail station at Beaulieu has not been fully considered. This site does not provide sustainable links to the city centre being separated by a main trunk road. The landscape along the river valley and surrounding the village of Danbury and Little Baddow is exceptional. It was acknowledged previously that this area has a high value landscape but there has	Sufficient and suitable land is available outside the Green Belt to meet the development needs within the Council's administrative area in a sustainable way. The Council does not consider that there are exceptional circumstances to release Green Belt land and the approach has therefore been rejected. The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Pre-Submission Consultation Document presents a suite of sites which are considered to be capable of meeting the identified development requirements, along with reasonable alternatives. As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that: - Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority,

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Ref-erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			been no justification as to why this is no longer considered a constraint to development in this location. The SA remains quite quiet on the shift from this site being unsuitable in landscape terms to now being a preferred option. The loss of tranquility within this river valley will be hugely detrimental and cannot be justified. Furthermore, there is considerable loss of high valuable and productive agricultural land in this location which is contrary to planning policy. I consider that the Council have not fully examined all possible alternatives having set their mind to a large-scale allocations north and east of Chelmsford. This allocation is unjustified, unlikely to be effective in delivery and it is not complaint with planning policy.	subject to challenge only on conventional public law grounds. - An option which does not achieve the objectives, even if it can properly be called an “alternative” to the preferred plan, is not a “reasonable alternative”. - The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process.” A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA. No change to IIA.
PSIIA-42	Saxtons 4x4	1.4.9	The Pre-Submission Integrated Impact Assessment (IIA) was last updated May 2024. Para 1.4.9 of the 2024 IIA confirms that “Development sites will be allocated to accommodate a minimum of 162,646 sqm of new employment business floorspace (Use Classes E(g)(i-iii), B2 and-B8) in addition to existing commitments over the Plan period”. It also confirms the spatial use of the area in a key diagram of its proposed spatial strategy, which is also Figure 14 of the 2025 Pre-Submission Plan (see below). The IIA confirms that despite the settlement hierarchy of the plan, of the 162,000 sqm needed for employment space only 9,000sqm of employment floorspace is to be provided in 2 locations at Maldon Way(4k) and 5k at previously developed sites in the urban	The Pre-Submission Local Plan proposes a continuation of the existing approach to employment land provision, i.e. a flexible rolling employment land supply across the plan period to 2041 using a combination of existing and new sites to achieve this. A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and

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Ref-erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			Chelmsford urban area. We believe that additional suitable and available sites could increase this supply, better aligning with the spatial strategy. The IIA cites various evidence base documents including the councils own economic strategy, and Employment Land Review and Annual Monitoring Reports, that will need to ensure that future growth of Chelmsford's economy will be dependent upon "the provision of high-quality development opportunities, including high quality office space and industrial unit space, in order to attract new investors". Indeed 2 of the key sustainable objectives of the IIA are also cited as a) The need to deliver a range of employment sites to support economic growth. b) The need to ensure a flexible supply of land for employment development. In regard to traffic flows and in/out commuting, the evidence base also states that there is "a significant outflow of commuters from the Chelmsford City Area alongside a significant inflow. In 2011, a total of 30,605 workers commuted into Chelmsford from other local authorities whilst 34,430 residents commuted out of Chelmsford. This represents a net outflow of 3,825 workers." With sustainable transport movements being a priority for the council we believe that all opportunities to retain and provide employment within the locale of the existing employment centres should be maximised. We would also note that the IIA does not seem to SA test alternative options to the employment allocations, or a "extend existing employment areas" options for assessment and we would seek confirmation that this has been undertaken. We therefore consider the plan to not be consistent with national policy and not positively prepared. To summarise regarding employment, the Local Plan in principle fails to demonstrate a fully justified approach in regard to employment policies supporting the need for employment space and protecting existing spaces. We are concerned that the Local Plan does not go far enough and therefore has not been positively prepared in clearly	rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA. No change to the IIA.

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Ref-erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			setting out a strategic strategy for the pattern, scale and design quality of spaces to make sufficient provision for employment, in line with the NPPF para. 20.	
PSIIA-33	Strutt and Parker (Farms) Limited (SPFL)	6.4.40	The latest IIA (January 2025) identifies the key sustainability issues for the Pre-Submission Local Plan, which fed into a framework against which proposals are assessed. It covers the potential environmental, social, economic and health performance of the Local Plan and any reasonable alternatives. 6.10 The IIA tested a series of alternative spatial options to that proposed in the Pre-Submission Local Plan, with Option 2b including Chatham Green (instead of Hammonds Farm). Option 2b is described as being rejected for three main reasons: • Transport Chatham Green is relatively isolated from the strategic highway network and new railway station, with limited sustainable accessibility or opportunity for solutions. Its relative isolation from existing services and facilities which would lead to higher reliance on the use of the private car. Employment opportunities would be less accessible to the wider population (for example through public transport). • Landscape capacity and sensitivity concerns. • Limited wastewater capacity to accommodate this development 6.11 As with the SHELAA scoring, it appears that the IIA has failed to have regard to the technical evidence submitted by SPFL during the Local Plan process.	Disagreement with the analysis is noted; however there is no compelling evidence that the Chatham Green Site performs any better than the preferred allocations in respect of matters such as self-containment through mixed use development, relationship to established transport infrastructure and certainty of delivery. The IIA draws on technical evidence compiled on behalf of the Council enabling comparison between spatial options. This includes: a water cycle study, a parish audit, landscape sensitivity and capacity study, transport impact appraisal, and sustainable accessibility mapping. For example, the IIA notes that the scale of the site would require the provision of free-standing services such as schools and a neighbourhood centre. The IIA notes (p.194) that development may support investment in highways improvements and public transport provision which could help to mitigate adverse effects in this regard. Nevertheless, the Transport Impact Appraisal of Preferred Spatial Approach, March 2024. Options 2b (which includes Chatham Green) was considered to have a comparatively worse performance than more self-contained development and the Sustainable Accessibility Mapping & Appraisal: (p,12) found that the Chatham Green site area exhibited the worst performance. With regard to landscape impacts, the IIA (p.202) cites technical evidence which concludes that the Chatham Green sites has an overall Low to Medium landscape capacity, reflecting an open agricultural landscape of relatively high visual sensitivity with modest opportunities for visual mitigation.

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				As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that: - Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds. - An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan, is not a "reasonable alternative". - The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a reasonable alternative and it does not have to be included in the SEA Report or process." A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA.

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Ref-erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
				No change to the IIA.
PSIIA-3	Essex Police	Section 3.4 paragraph 3.4.8	The document notes that crime can influence health, wellbeing, and deprivation. It is recommended when developing new communities there is engagement with the Designing out Crime Office (DOCO) to ensure crime is designed out in the early stages. Similarly, engagement with the DOCO can be used to evidenced strategic statements within the Health Impact Assessment.	Comment noted. No change to the IIA.
PSIIA-7	Essex Police	Appendix J	Core Standard 1; Core Standard 2; Core Standard 3: The Designing out Crime Office (DOCO) welcomes the acknowledgement within the Health Impact Statement that developers are required to 'create a safe and accessible built environment with well-designed public spaces that encourage community participation and designing out crime measures.' It is advised that for Secured by Design (SBD) measures to be fully incorporated into schemes then there is engagement with the DOCO in the early stages and an SBD award applied for at the appropriate stage. This would support core standard 2 as new or refurbished active routes can be designed to be inclusive, safe, and sustainable. This would further align with the Violence Against Women and Girls (VAWG) strategy which has previously been alluded to within this document. Using SBD products can support environmental and sustainability initiatives. (This has been detailed in section 3.2 'Strategic priorities' of this document.)	Comment noted. No change to the IIA.
PSIIA-5	Essex Police	Section 5.2	Please note, that whilst this is a separate document, all previous comment in relation to the Local Plan Review correlate to this priority	Comment noted. No change to the IIA.
PSIIA-4	Essex Police	Section 3.5 (paragraph 3.5.20)	The document notes that crime can influence health, wellbeing, and deprivation. It is recommended when developing new communities there is engagement with the DOCO to ensure crime is designed out in the early stages. Similarly, engagement with the DOCO can	Comment noted. No change to the IIA.

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Ref-erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			be used to evidenced strategic statements within the Health Impact Assessment.	
PSIIA-6	Essex Police	Section 5.5	Early engagement with the DOCO is recommended to ensure the growth has a minimal impact on policing and is designed so future residents and visitors feel safe in their homes and community.	Comment noted. No change to the IIA.
PSIIA-56	Catesby Land & Planning	Policy S6	2.6 In this respect, the Council's stated justification in their Integrated Impact Assessment as summarised in the Pre-submission Housing Topic Paper is that meeting the higher housing requirement figure based on the new Standard Method: "Was discounted as it performed poorly overall [against the sustainability objectives] reflecting greater resource use with greater uncertainty overall such as potential oversupply of housing in the plan period, disrupting coordinated delivery against identified need. It would also disturb the balance between housing and jobs provision" 2.7 This implies that the Council's decision for the Plan to proceed to Regulation 19 stage and onto Examination without meeting the new LHN in full, is not just a pragmatic attempt to minimise delays to Plan making but a deliberate and contrived attempt to avoid meeting the higher LHN in full because of concerns about environmental harm. It is implied that the Council sees the new LHN as optional rather than mandatory and the suggestions that meeting the LHN in full could lead to an oversupply of new homes is wholly unsubstantiated and is inconsistent with National Policy and not justified by the evidence. In particular, it is considered that this is at odds with both Government objectives in addressing the housing crisis, the Council's own declaration of a housing crises and the housing market evidence within the Council's Strategic Housing Needs Assessment.	The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process and has demonstrated that it can meet its development requirements as set out in Policy S7. This approach accords with the evidence base. As noted in the IIA analysis (p.190) whilst Option 3 would meet the full needs identified through the revised Standard Method (1,406 dwellings per annum) and is therefore also identified as having the potential for a long-term significant positive effect. The housing delivery rates over the past 10 years have been in the order of 1,000 dwellings per annum. Whilst the provision of a quantum of housing beyond the transitional need is likely to provide additional flexibility in delivery and choice of tenure, over-delivery could be disruptive to the local housing market with demand failing to match supply and potentially stalled developments. As a result, there is an element of uncertainty in relation to Option 3. Thus the identification of uncertainty reflects a reasonable concern that growth would disrupt the chosen plan approach in respect of transitional growth. No change to the IIA.
PSIIA-26	Taylor Wimpey Strategic Land	Reasonable Alternatives	5. STRATEGIC GROWTH SITE POLICY 2 – WEST CHELMSFORD 5.1 Strategic Growth Site Policy 2 is not considered sound, due to its failure to incorporate allocation of the Site 21SHELAA41 as part	Comments on assessing all reasonable alternatives are noted. The IIA appraises the Local Plan Review from Issues & Options Stage through to Submission. The Local Plan

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Ref-erence	Consultee	Relevant IIA paragraph/ table/ figure/ appendix	Consultee Response Summary	Response/ Action
			of this strategic growth site. 5.29 On one hand, it would be hopelessly simplistic to select or reject sites for allocation based on a scoring system such as that set out in the SHELAA. However, it does beg the questions as to what the purpose of providing the total score is; and, if the SHELAA is not being used to inform the selection / rejection of sites, what is? 5.30 In respect of this last question, one could expect to find the answer to this in the IIA. 5.31 The SEA Regulations require that for plans such as the emerging new Local Plan, an Environmental Report is prepared. In the case of the emerging new Local Plan, the IIA appears to seek to meet this obligation. 5.32 The Environmental Report is required to identify, describe, and evaluate the likely significant effects on the environment of proposed options, as well as on reasonable alternatives (Regulation 12(2) of the SEA Regulations). 5.33 As per Regulation 16 of the SEA Regulations, the Environmental Report is ultimately also required to explain the reasons for selecting options and rejecting others. 5.34 The Site was assessed as part of the Draft Local Plan (DLP) IIA. A 'traffic light' scoring of the Site is presented in the IIA against multiple SA objectives, presented in Appendix M of the IIA. We note that this appraisal identifies a number of positives against various sustainability objectives. Where negative impacts are identified, these are largely as per those identified in the SHELAA. As discussed earlier, these can be largely mitigated and / or are not as significant as the SHELAA implied. 5.35 However, despite the Site's appraisal within the IIA, the IAA does not attempt to explain why the Site is rejected and alternatives have been selected. 5.36 Whilst it does seek to explain why the Site in conjunction with multiple others, including potential employment land, is not selected, this is of course different to considering the merits of the Site as a potential relatively modest extension to an existing Strategic Growth Site.	Review contains reasonable alternatives as spatial, site and policy options. The purpose of the IIA is to appraise the Local Plan as proposed at each stage of its evolution, including the reasonable options presented therein. The IIA is not tasked with appraising all alternative options, of which there are many combinations. The Pre-Submission Consultation Document presents a suite of sites which are considered to be capable of meeting the identified development requirements, along with reasonable alternatives. As per the SEA regulations, the SA needs to consider and compare reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the plan area. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the levels of growth, policies and site allocations in the plan. It has been established through case law (R (on the application of RLT Built Environment Ltd) v. The Cornwall Council and St Ives TC [2017] JPL 378) that: - Reasonable alternatives does not include all possible alternatives: the use of the word "reasonable" clearly and necessarily imports an evaluative judgment as to which alternatives should be included. That evaluation is a matter primarily for the decision-making authority, subject to challenge only on conventional public law grounds. - An option which does not achieve the objectives, even if it can properly be called an "alternative" to the preferred plan, is not a "reasonable alternative". - The question of whether an option will achieve the objectives is also essentially a matter for the evaluative judgment of the authority, subject of course to challenge on conventional public law grounds. If the authority rationally determines that a particular option will not meet the objectives, that option is not a

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				reasonable alternative and it does not have to be included in the SEA Report or process." A range of development quanta, broad distributions of development and site options available have been tested through the IIA. It is considered that an appropriate range of realistic options and reasonable alternatives have been tested through this iterative process. Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Local Plan and the IIA. No change to IIA.
PS11A-50	Natural England	Habitats Regulations Assessment	We have the following comments to make on the Chelmsford City Council Local Plan 2022 – 2041 Habitats Regulations Assessment (WSP, December 2024): We disagree with the statement in para 4.2.15 that none of the Pre-Submission allocations will have significant effects alone with the exception of Land North of South Woodham Ferrers and allocations that may affect functionally linked land (FLL). We consider that major developments within the recreational disturbance Zone of Influence (ZOI) established by Essex Coast RAMS, particularly the Garden Communities and those with over 100 dwellings, will have a likely significant effect taken alone. However, we consider that standard measures as detailed in our Suitable Alternative Natural Greenspace (SANG) Guidelines can provide suitable mitigation to address 'alone' impacts. We agree that the allocation at South Woodham Ferrers requires consideration under the Habitats Regulations due to its large size and proximity to a European site. However, all site allocations within the recreational disturbance ZOI established by the Essex Coast RAMS require consideration under the Habitats Regulations. With regard to FLL, we agree with the international sites that have been screened in (Table 4-10). We agree that windfall	We are pleased that Natural England consider the Local Plan 'sound' with regard to aspects relevant to their Natural Environment remit, notably requirements under the Habitat Regulations. Minor recommended updates to policy wording are therefore, to improve clarity rather than being necessary to achieve legal compliance. The comments received from Natural England are focused on ensuring that potential recreational pressure upon Habitats Sites through growth under the Local Plan are minimised, and as necessary effects mitigated. We acknowledge recommendations relating to Strategic Policies S4 – Conserving and enhancing the natural environment and S9 – Infrastructure requirements. The recommended minor changes to wording reference 'other mitigation' beyond payment under RAMS and the need to adopt the approach progressed under future iterations of the Essex Coast RAMS SPD (current version dated 2020) and we will consider preparing an addendum to address this if required.

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			developments that may be located on FLL can be determined at a project-level (section 5.5.7). However, note that any windfall development with suitable habitat that has the potential to affect FLL due to its proximity to coastal sites, should provide sufficient evidence to determine whether the application site constitutes FLL or not. We agree with the screening summary (section 4.4). With regard to Recreational Pressure/Urbanisation' (sections 5.2, 6.2, 7.2), we consider that more weight should be given in the HRA under 'Incorporated Mitigation' to bespoke scheme-level measures (e.g. the provision of sufficient accessible on-site green infrastructure and circular walks) that may be required by CCC for some developments, in addition to payments under the RAMS (paras 5.2.12, 6.2.7, 7.2.9). Subject to the provision of sufficient high quality accessible natural greenspace to mitigate alone impacts of larger developments, we agree with the conclusion that the Pre-Submission Local Plan will have no adverse effects on the integrity of the Essex Coast Habitats Sites due to recreational pressure or urbanisation effects, alone or in combination. Depending on the size of the proposal and its distance from the coast, adherence with all of the criteria in the NE SANG Guidelines 2021 may be required to fully mitigate alone impacts. In such cases, payment of the RAMS tariff is to mitigate for residual impacts, as the provision of greenspace will never fully prevent visits to the coast, nor is that the aim of such greenspace. We agree with the policies requiring provision of wastewater treatment capacity that require sufficient wastewater treatment to be available and effective for new development in advance of occupation. We note the particular reference to Great Leighs in this respect. As noted in the HRA, the impacts of the CCC Local Plan will not be substantive enough to prevent the achievement or maintenance of favourable conservation status at Epping Forest SAC, if the mitigation plans outlined in Local Plans adjacent to the SAC are delivered as proposed. Consequently, based on the	The above recommendations are consistent with comments on the *Chelmsford City Council Local Plan 2022 – 2041 Habitats Regulations Assessment (WSP, December 2024)* (Appendix N of the Pre-Submission IIA) which primarily relate to the potential effects of recreational pressure upon Habitats Sites resulting from growth under the Local Plan. Specifically, that the effects of allocations alone and in-combination must be considered, and as necessary effects mitigated, through project level actions such as the provision of Suitable Alternative Natural Greenspace (SANG) and strategic mitigation under the Essex Coast RAMS. Subject to the provision of sufficient high quality accessible natural greenspace to mitigate alone impacts of larger developments, Natural England is in agreement that the Pre-Submission Local Plan will have no adverse effects on the integrity of the Essex Coast Habitats Sites due to recreational pressure or urbanisation effects, alone or in combination. The HRA report considers allocations that may have significant effects 'alone' '*that are not obviously avoidable with the standard project-level measures that would be required to meet existing regulatory regimes*' in Paragraph 4.2.14 and notes that none of the pre-submission allocations will have significant effects alone with the exception of Land North of South Woodham Ferrers and allocations that may affect functionally linked land (FLL). Nonetheless, allocations are screened in for further assessment on the grounds that increases to recreational pressure are inherently cumulative in nature ensuring a robust assessment. We acknowledge that further clarity regarding the weighting given to project level measures designed to minimise the contribution of schemes 'alone' to overall recreational pressure would be helpful and we will consider preparing an Addendum to provide detail on this aspect if required.

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			available data including recent air quality modelling from other LPAs, it is considered that the Pre-Submission draft Local Plan will have no adverse effects on the integrity of Epping Forest SAC, alone or in combination.	

Chelmsford Policy Board

26 June 2025

Homelessness & Rough Sleepers Strategy 2025-2030

Report by: Director of Sustainable Communities

Officer Contact: Paul Gayler, Strategic Housing Services Manager, paul.gayler@chelmsford.gov.uk Tel: 01245 606375

Purpose

To present an updated Homelessness and Rough Sleepers Strategy 2025-2030 for recommendation to Cabinet. Chelmsford City Council's previous Homelessness and Rough Sleepers Strategy was published in 2020 so it is now due for review and replacement.

Local Authorities must publish a strategy at least every 5 years that outlines how homelessness and rough sleeping will be prevented and relieved.

This is the proposed final version which has been developed in consultation with partners, a Policy Board Working Group, and the public throughout the autumn and winter of 2024/25.

Recommendations

1. The Policy Board recommend to Cabinet that the Homelessness and Rough Sleepers Strategy 2025-2030 be approved.

2. The Policy Board delegate to the Director of Sustainable Communities in consultation with the Chair, Vice Chair and Cabinet Member for Fairer Chelmsford, to make any final changes to the Strategy ahead of the consideration by Cabinet.

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1. Background

1.1 Chelmsford City Council's previous Homelessness and Rough Sleepers Strategy was published in 2020, so it is now due for review and replacement in order to comply with the legal duties of the Homelessness Act 2002. The purpose of the Strategy is to establish the Council's ambition and priorities to reduce homelessness and rough sleeping in the district.

1.2 This new Strategy reflects the changing housing market conditions in the district, specifically in relation to the supply and affordability of housing and how the lack of accessible social and affordable homes and supported housing options impacts on people's ability to find and sustain permanent housing.

1.3 The impact of individuals' social-economic position and health and well-being is determining factor in ensuring that people can sustain their home and dictates the need for a better supply of specialist and supported housing.

1.4 The new Strategy will enable the Council to reset the priorities in line with the housing market conditions and reinvigorate activity in partnership to tackle homelessness, rough sleeping, and the causes. It also brings the work of Strategic Housing Services up to date with changes over the last five years and prepare for the issues that are expected in the future

2. Context

2.1 The continued reduction in the availability of social housing and the rising cost of private rent has led to a considerable increase in the need and cost of temporary accommodation for this Council and many others over the last five years. Tackling homelessness and rough sleeping is therefore a critical priority for both the Council and the growing number of local households who find themselves at risk of losing their home as even those with the highest priority will face an indeterminate wait for suitable alternative housing options.

2.2 This Council recognises that tackling homelessness and rough sleeping requires a whole system approach and it is imperative that partner agencies support and own the ambitions and contribute to its delivery through collaboration and joint

working. This is reflected in the action plan of the Strategy which involves partnership working with a number of other organisations.

2.3 The housing market challenges specifically the lack of social and affordable housing and the wide differentials in income levels to house prices. The average house price is £398,000 and the average income £30,000; the average monthly rent is between £522 for a single room to £1,714 for a 4bed property, resulting in housing supply and affordability driving the number of homeless households.

2.4 In 2024/25 we saw the largest ever number of enquiries from people concerned about losing their home, the lowest known number of affordable homes available to allocate through the Housing Register and private rents reach their highest level, often far above what can be paid through Local Housing Allowance.

3.0 Homelessness and Rough Sleepers Strategy 2025-2030

3.1 The Homelessness and Rough Sleepers Strategy 2025-2030 highlights three main causes of homelessness, each of which has increased by nearly 50% since the previous strategy was introduced in 2020 and influence the actions of this new strategy:

- Friends and family breakdown 33%
- End of a Private Rented Tenancy 26%
- People experiencing domestic abuse 18%

3.2 Eviction by family and friends – many are not aware of how grave the housing situation is in Chelmsford until they become homeless, this includes those who are asking them to leave. For this reason we want to extend the work we have begun to improve awareness and the use of the existing ‘homeless at home’ policy.

3.3 End of private rented tenancy – we are expecting the introduction of new legislation within the next 12 months following the Renters’ Reform Bill but are realistic as to the extent that this will reduce the number who find they can no longer afford or remain in privately rented housing. We also see supply from this sector decreasing and in all likelihood the cost continuing to rise. Based on what we have learnt from working with several hundred families who have been housed in Chelmsford through the Homes for Ukraine scheme, we want to work more closely with private landlords across a wider area, preparing for the new legislation and extending the use of the Rent Deposit and Tenancy Access Schemes.

3.4 Domestic abuse – we have found that levels of homelessness as a result of domestic abuse are three times higher in Chelmsford than elsewhere in Essex, the East of England and nationally. There are several reasons for this so we need to work with a larger number of partners in new ways to help prevent and protect those at risk.

3.5 People experiencing homelessness often have additional support needs, the most common include mental health, physical ill health and disability and people requiring support to recover from domestic abuse and the new strategy seeks to provides additional accommodation with support as a cost-effective alternative to the use of temporary accommodation.

3.6 The draft final version of the Strategy is attached at Appendix 1.

4.0 Consultation Process

4.1 The Code of Guidance gives specific direction for local authorities developing Homelessness Strategies: "*Housing authorities must consult public or local authorities, voluntary organisations or other persons as they consider appropriate before adopting or modifying a homelessness strategy. Housing authorities will also wish to consult with service users and specialist agencies that provide support to homeless people in the district.*"

4.2 Information is provided at the end of the Strategy on which authorities and organisations have been involved with developing this. In addition, there have also been two on-line consultations available for public responses and engagement with service users and more specialist agencies.

4.3 A common issue that has emerged from both organisations and public participants is the need to have a better understanding of the causes of homelessness locally and the nature of the housing crisis. For this reason, we shall devote more time than before to explaining this, working closely with the Council's Communications Team and others during the lifetime of the Strategy.

5. Conclusion

5.1 A review of homelessness has informed the action plan and all of these are SMART (Specific, Measurable, Achievable, Realistic and Timebound). During the planned consultation period the intention was to have the final version of the Strategy in place by the start of the year, so some actions are already well progressed.

5.2 Members may be aware that the Housing Services continues to monitor performance and other indicators on a monthly basis, this will continue along with progress of this action plan and an annual review of the aims and actions of this Strategy. This ensures that the Service remains effective in understanding and responding to its legal duties and the needs of those who are at risk of homelessness.

List of appendices:

Appendix 1 - Draft Homelessness and Rough Sleepers Strategy 2025-2030

Background papers:

None

Corporate Implications

Legal/Constitutional: All Local Housing Authorities are required by law to undertake a review of homelessness in their area and produce a strategy that is informed by this no less than once every five years.

Financial: Clearly stating the need and aims of a Local Housing Authority in its Homelessness and Rough Sleeper Strategy can help inform and influence future decisions on funding from others including central government.

Potential impact on climate change and the environment: None

Contribution toward achieving a net zero carbon position by 2030: None

Personnel: Some posts in the Council's Housing Service are funded by central government based on the need and requirements identified in the previous strategy and the new strategy highlights both the achievements and continuing need for this resource.

Risk Management: By reviewing and planning for future trends in homelessness the Council is able to assess and make best use of resources to ensure it can continue to meet its legal obligations.

Equality and Diversity: An Equality Impact Assessment has been completed and informs some of the issues and actions.

Health and Safety: None

Digital: None

Other: None

Consultees:

Listed within the Strategy

Relevant Policies and Strategies:

Chelmsford Housing Strategy 2022-2027

Chelmsford Tenancy Strategy 2024-2029

Temporary Accommodation Placement and Procurement Plan



Homelessness and Rough Sleeper Strategy (including Action Plan) 2025-2030

Chelmsford City Council

Contents

Foreword	**3**
S1: Introduction • Our Homelessness Ambition	**4** 7
S2: Strategic Links • Our Chelmsford, Our Plan • Housing Strategy 2022-2027 • Local Plan	**8** 9 10 11
S3: Review of Homelessness in Chelmsford • Understanding the drivers of homelessness • Main causes of homelessness in Chelmsford • Rough sleeping • Prevention & relief of homelessness • Temporary accommodation • Supported & specialist housing	**12** 13 15 18 20 21 23
S4: Developing our Strategy	**25**
S5: Strategy Consultation • What have we learnt from our consultation?	**28** 29
S6: Our Ambition	**36**
Action Plan	**39**



Chelmsford City Council

Foreword

Many of us are fortunate not to have a direct experience of homelessness, but there are growing numbers of families in our district who do. In many decades of working in the housing sector in Chelmsford, this is the worst situation I can remember. Families with children don't instantly come to mind when most people think of homelessness, yet tragically, this is the biggest group we are dealing with. The risk of losing a home and not being able to find another is far greater and much closer for a larger number of people. This situation isn't only a problem for Chelmsford – but it's a national crisis that is also a problem for Chelmsford.

Over the last few years, more Chelmsford households than ever have been placed in temporary accommodation, as private rents have shot up and the number of social housing lettings has gone down. Council officers do their best to find emergency housing for all those to whom they have a duty of care, but it's hard to overstate the devastating impacts of living in TA that doesn't fit your needs: the anxiety of not knowing how long you'll stay in a place; growing up in conditions that might harm your development; the loneliness of finding yourself far from friends and family. These are the daily traumas of not having a permanent home and it's hard to overstate how damaging they can be.

That's why we must work harder than ever to understand the causes and consequences of homelessness in 2025, so that we can stop as many people as possible from losing their homes and work with our partners to better serve those who do. Over the last few years, some progress has been made in reducing rough sleeping in the city and increasing the supply of supported accommodation. We're proud of the work already being done to improve lives through partnerships in the Chelmsford community. The CHESS Turning Point project, for instance, is making a real difference, giving homeless single adults a safe and dignified place to stay and the chance at a new start.

We must now redouble our efforts to meet the urgent needs of today – keeping people in their homes wherever we can and creating more and better temporary accommodation and family homes for when we can't. We are already making some progress in improving the supply of affordable and supported housing, but it's essential that more people are aware of the limitations we face as prevention really is key. The housing crisis we are facing has been many decades in the making and it won't be fixed overnight, but this strategy is an important step in setting us on the right path. With a better awareness of today's problems and some fresh thinking, we hope to make a difference to more people when they need us most.

Councillor Lynne Foster, Deputy Leader and Cabinet Member for a Fairer Chelmsford

Section 1: Introduction



Local Housing Authorities must publish a strategy at least every five years setting out how they will prevent homelessness and meet their legal duties to those who become homeless, including those at risk of sleeping rough. The strategy should be based on a review of homelessness in the district.

The **national Homelessness Code of Guidance** outlines the key components that are expected to be included within a strategy:

- It should be consistent with other plans and strategies for the authority, demonstrating that all relevant departments and corporate partners are committed to delivering the aims of the strategy;
- It should take into account local trends such as the main causes of homelessness, changes since the last strategy and future needs and demands.
- It should include links with other local statutory and voluntary organisations in the area, especially those that are involved with health, social care, criminal justice and economic policy;
- It should recognise and build on opportunities for working with Essex County Council and neighbouring authorities, especially if the council is not a unitary authority, as is the case with Chelmsford City Council.

Over the last five years there have been a number of significant changes, in particular:

Cost of living	The cost of renting and maintaining a home has risen faster than inflation, placing a growing number of families into debt
Temporary accommodation	As the gap between the need and supply of affordable accommodation has grown, more and more families have been placed in temporary accommodation.
The Covid Pandemic	Introducing new and more flexible ways of working, closer ties with health and an increase in resources for those sleeping rough in Chelmsford.
The war in Ukraine	With several hundred Ukrainian families moving to Chelmsford to live temporarily as guests in people's homes, longer term plans for where they will live have been needed.
The withdrawal from Afghanistan	Families who were placed temporarily in hotel accommodation have now been helped to move into settled housing with additional resources for support and housing.
Provision of accommodation locally for asylum seekers	Some people will be granted leave to remain which will end their Home Office temporary accommodation, making them homeless.

In addition to these national challenges there have also been some additional local issues.

Private rented homes

Rents have risen and very few homes in Chelmsford are now affordable to those on low incomes and a growing number of landlords have sold up, reducing the local supply and choice. Homelessness from people being given notice in this sector has become the single greatest cause of homelessness in Chelmsford.

Affordable housing

Nationally and locally the number of lettings (supply) of affordable homes has reduced each year over the last decade. The Council has enabled the development of more homes in addition to those that are required through our policies for new developments. This has made a difference, but only in slowing down the declining rate of supply.

Domestic abuse

Levels of domestic abuse have increased in Chelmsford, causing more families to become homeless. As a cause of homelessness, this is now three times higher in Chelmsford than the national average.

Supported housing

A growing number of those who become homeless in Chelmsford have a need for support, as well as accommodation, to enable them to cope with additional needs and be able to manage their home. Mental health, domestic abuse, physical disability and illness are the most common issues.



There has been some progress in helping to reduce the impact of some of these challenges over the last five years:

- More resources and better working with partners to reduce the level of rough sleeping in Chelmsford;
- Additional funding and staff to support homeless victims of domestic abuse and Ukrainian and Afghan families; and
- Changes to policies to extend housing options, ensuring the Council can meet its legal duties to those who in greatest need.
- Additional temporary accommodation in Chelmsford, working with our partners to keep the number of people in TA below that projected.

Chelmsford City Council

Our Homelessness Ambition

Our review of homelessness provides us with the evidence for the priorities of this strategy. There are also broad themes which will help us to create a sustainable service for the future. **Our ambition is:**

1 Universal prevention

To use our understanding of the causes and consequences of homelessness to develop a better awareness of the risks involved, and as a result, the importance for everyone of prevention wherever possible.

2 Targeted prevention

Our review of homelessness helps us identify the most frequent causes of homelessness. We want to make sure that these are addressed as effectively as possible, whether through prevention or relief.

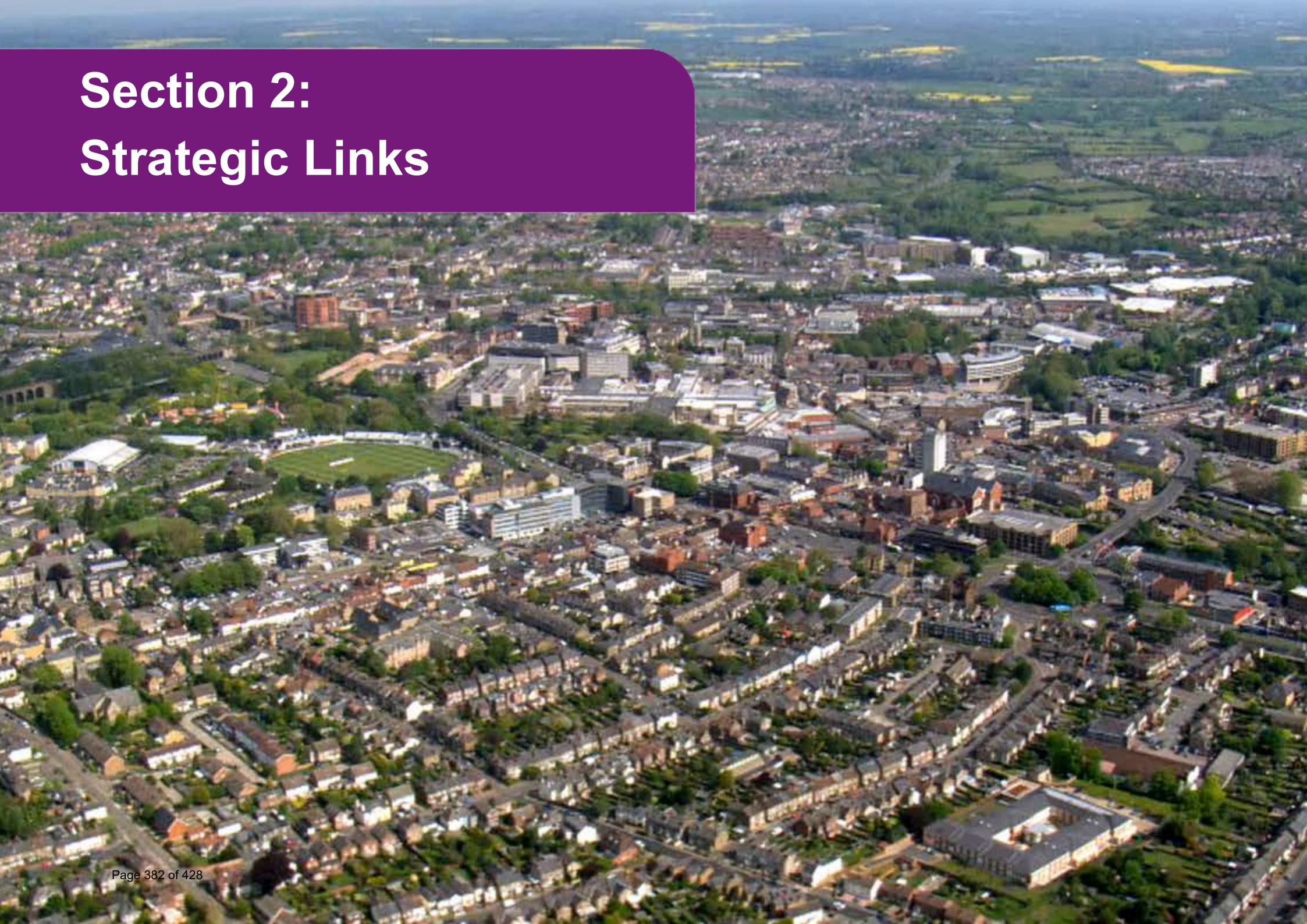
3 Intervention and recovery through partnership working

Many aspects of homelessness are beyond the Council's expertise and resources. Issues such as domestic abuse, mental and physical poor health, debt and poverty cross over into the role of other agencies, statutory and voluntary. Only by building strong partnerships can we reduce homelessness and help those who have become homeless build a better future.

4 An integrated approach to local housing options

We associate homelessness with the loss of a home but it is the inability to find another home that makes a person or family homeless. We are now seeing the lack of supply as the main reason people in Chelmsford become and remain homeless. Whether this is due to the reducing supply of affordable homes, supported accommodation, or even temporary accommodation, we must do all we can to improve the supply of homes to those in greatest need through this and other streams of work.

Section 2:
Strategic Links



Our Chelmsford, Our Plan

Our Chelmsford, Our Plan is the Council's corporate plan that sets out priorities to help create a greener, fairer, and more connected place. Our Chelmsford, Our Plan reaffirms our ambition for the area to be a highly sustainable and creative community at the heart of Essex, recognised as a leading regional centre and destination in the East of England.

Our Chelmsford, Our Plan' aims to deliver a fairer and more inclusive place.

- By promoting sustainable and environmentally responsible growth to stimulate a vibrant, balanced economy, a fairer society and provide more homes of all types.
- Bringing investment into the area, together with an increase in skills, jobs, and overall employment.
- Meeting the demand for new homes of all types and tenures, in particular homes to rent that local people can afford.
- By adopting an approach whereby growth and development also delivers a broad range of social, community and environmental benefits that are sustainable over time.





Our Chelmsford, Our Plan **Priority A**

Set out the approach and planning principles to guide housing and economic growth, promoting sustainable development and helping to create greener, fairer and more connected communities.

Our Chelmsford, Our Plan **Priority B**

Put in place measures to help tackle local housing needs so everyone can aspire to having a home that they can afford, and which help address the causes of, and mitigate the impacts of, homelessness.

Our Chelmsford, Our Plan **Priority C**

Promote the area as a place for investment and business location, encouraging the creation of a wider range of jobs and excellence in education, skills, and vocational attainment, thereby improving income equality.

Housing Strategy 2022 - 2027

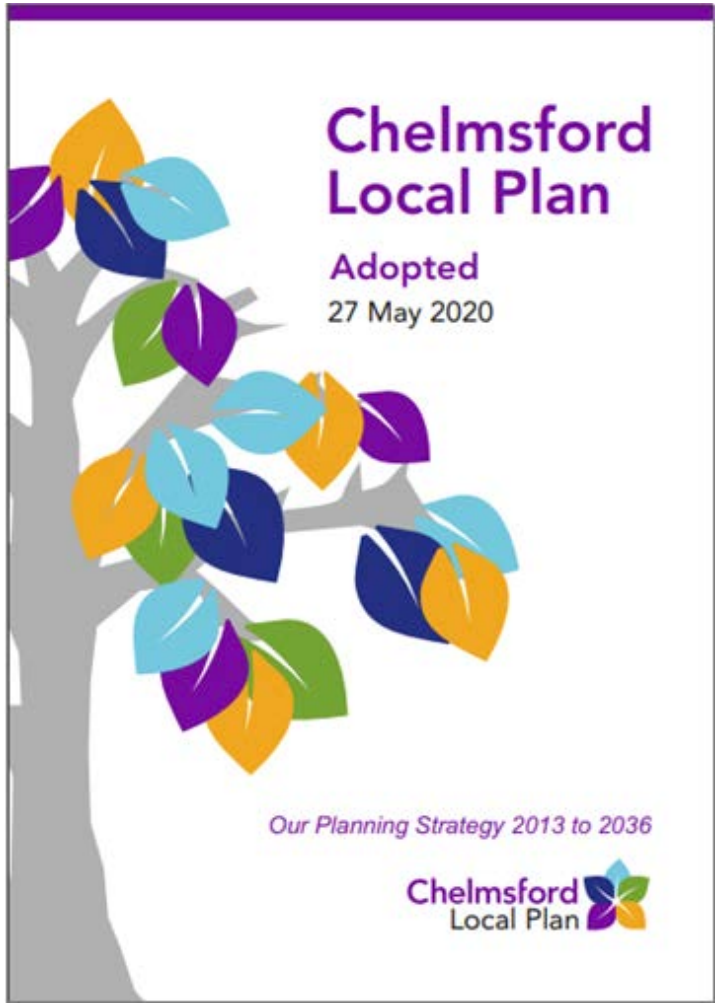


The priorities established in the Housing Strategy 2022-2027 are currently under review due to the changes and challenges of the housing market and the onset of new legislation which has renewed the focus on housing conditions in the private and public sector. However, the vision to address the housing needs of all Chelmsford residents is paramount, so everyone can reasonably aspire to having a home that meets their needs.

The priorities under consideration are:

1. Increase the supply of housing options across all tenures and price points in the housing market, with a focus on affordable.
2. Improve the housing conditions across all tenures.
3. Enabling housing options & support options for vulnerable people, health and well-being, older people, people with complex needs and people experiencing homelessness / rough sleeping.
4. Delivering through effective partnerships.

Local Plan

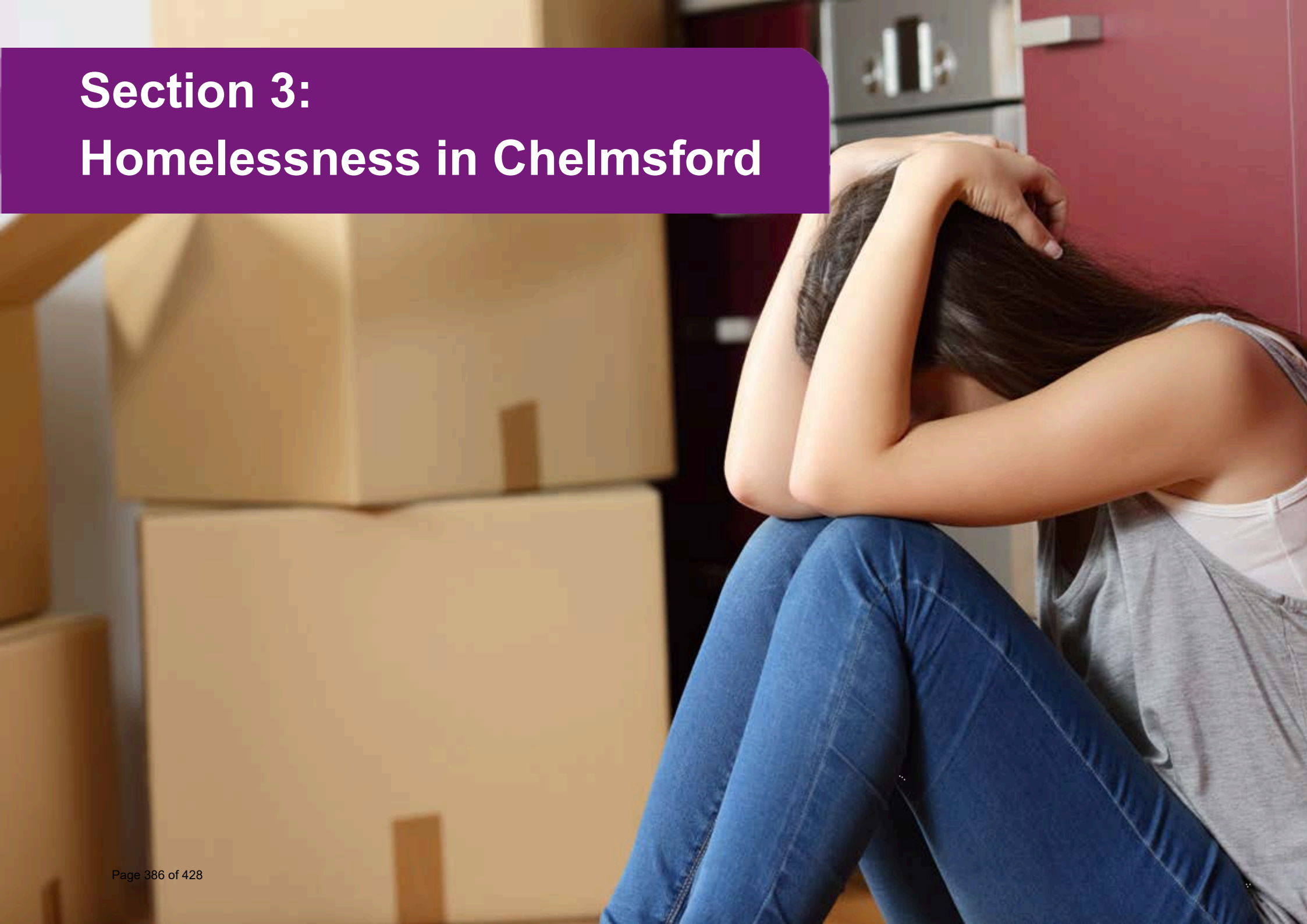


The Council's Local Plan sets out our vision for the future, ensuring there is an adequate supply of housing, infrastructure and services to meet the needs of every citizen of Chelmsford. This includes policies for the supply of affordable homes and specialist housing that can provide support to those who are homeless or in other types of housing need.

The review is informed by an updated Strategic Housing Needs Assessment. This highlighted how great the need is for both affordable housing and the specific type of affordable tenure required to bridge a growing gap for those unable to afford a home on the open local housing market in Chelmsford.



Section 3:
Homelessness in Chelmsford



Understanding the drivers of homelessness



Understanding the main causes and changes since the previous strategy in 2019/20 in Chelmsford is crucial to the prioritisation of action and intervention.

Assessed homelessness applications:

- In 2019/20 there were 812
- In 2023/24 there were 1,135

The average number of cases per month has increased over the last five years from 68 to 95, an increase of nearly 40%.

The average caseload of active cases for each Homelessness Officer in March 2024 was 66, this is more than twice the number recommended by MHCLG. By the end of 2024 this has risen to 90+ cases.

Over the same period, the number of homes available to let through the Housing Register has reduced by 25%, from 316 at the start of 2019/20 to 235 by the end of 2023/24.

This gap between need and supply has in the past been offset by using privately rented homes as an alternative but the rising cost of this tenure has effectively ended this option for those on a low income. The table below shows the gap between Local Housing Allowance and the monthly average cost of a home by bedroom size in Chelmsford over the last five years.

Bedroom size	Shortfall Q4 2019/20	Shortfall Q3 2023/24	Shortfall Q4 2023/24
1-bed	£125	£450	**£368**
2-bed	£180	£655	**£575**
3-bed	£215	£738	**£618**
4-bed	£404	£1,155	**£1,115**





Despite an increase in Local Housing Allowance at the end of the 2023/24 financial year, there remains a considerable shortfall of around £100 to £250 per week for many families.

This gap between the need and supply of affordable homes in Chelmsford has contributed to the number in temporary accommodation increasing from 272 to 500 over the same period. An increase of 41% reflects a 40% increase in need alongside a 25% reduction in supply of affordable homes.

Image 1 (top):
Existing modular housing in Chelmsford

Image 2 (bottom):
Planned modular housing in Meteor Way

Chelmsford City Council

Main causes of homelessness in Chelmsford

1. Eviction by family or friends



2. Section 21 NTQs (all)



3. Domestic abuse



The table below shows a comparison of the main causes of homelessness in Chelmsford over the last five years. The percentages will not add up to 100 as there were some other causes that are not so significant.

Reason for homelessness	2019/20	2023/24	Change
1. Eviction by family or friends	**155 (21%)**	**359 (33%)**	**+204**
2. Notice by private landlord	**105 (14%)**	**277 (26%)**	**+172**
3. Domestic abuse	**80 (11%)**	**191 (18%)**	**+111**
4. Notice by social housing landlord	103 (14%)	105 (9%)	+2
5. Non-violent relationship breakdown	49 (7%)	45 (4%)	-4
6. Leaving hospital, prison or other institution	11 (1.5%)	86 (7%)	+75
7. Other reason or not known	227 (31%)	20 (2%)	-207

What has changed?

The largest variation has been in the number of cases where the reason for homelessness was not known - in many of these cases this reflected a lack of appreciation in the importance of accurately identifying and recording the causes of homelessness. Therefore, it is good to see that this has reduced to just two percent, giving a more accurate picture of the cause of homelessness in Chelmsford today.

1. Eviction by family and friends

It is likely that many of the cases where the cause was not previously recorded would have been for this reason, reducing the variation shown in the table above. This seems to have changed from a cause that was predominantly associated with eviction of older children by parents to one of adult children returning temporarily to the family home having lost other accommodation, or people relying on friends to help them when becoming homeless through other reasons.

By carrying out home-visits we can make families and friends aware of how hard it can be to find affordable housing in Chelmsford and a number of cases are prevented in this way through our 'Homeless at Home' scheme.

2. Notice by private landlord

This has more than doubled as a cause of homelessness over the last five years and reflects a regional and national trend.

It is a concern that in a number of cases this is due to landlords selling the home and no longer being a private landlord. This means that not only would the proposal to end no-fault evictions not apply to these cases, but there is also a reduction in the number of homes of this tenure in Chelmsford.

An action of this new strategy will be to expand communication with landlords in this sector to help us improve our ability to plan for and manage changing trends and hopefully new opportunities to work together.

3. Domestic abuse

This has also doubled as a cause of homelessness over the same period. The Domestic Abuse Act was introduced in the intervening period with a number of new requirements that could help. These include: providing safe accommodation to those who lose their home for this reason; better use of court orders to keep perpetrators away from families at risk; a commitment that those in social housing will be considered for a like-for-like replacement; and a duty on upper-tier local authorities to provide strategies that set out how these and other aims of the Act will be delivered in their area.

As a cause of homelessness, this is three times higher in Chelmsford than the national and regional averages and has to be a priority in this new strategy.

Following consultation with partners and those who have become homeless for this reason, we can see a need to improve the way a range of services, from police, housing associations and local charities work together to make best use of resources and improve the help and options for those at risk.



4. Notice by social landlord

Taking into account the increase in other causes and the overall number becoming homeless, it is good news that this has remained almost the same over the last five years despite the cost-of-living crisis and other pressures local families face.

We are grateful for the help and support of local housing associations for the work they do in partnership with the Council and other agencies to avoid the risk of people losing their tenancies. We want to continue to build on this success to see if we can reduce this over the lifetime of this strategy.



5. Non-violent relationship breakdown

As a cause of homelessness this is likely to be more incidental to other factors, such as changes to the housing market, than some of the other causes making it difficult to proactively manage this as a cause. Improving the supply of affordable housing in general, and other options, would inevitably help make an improvement in the future.

6. Leaving hospital, prison or other institution

It was hoped that the introduction of the Homelessness Reduction Act and its accompanying duty on some organisations to help identify and refer people at risk of homelessness would have maintained, if not reduced, levels of homelessness. We are pleased that a growing number of people are being identified and referred but concerned by the limited opportunity to prevent homelessness in many of these cases. Some are very vulnerable, and there is a need to make referring agencies aware of this in order to manage expectations and to work more closely on preventing and relieving homelessness.

We have been successful in developing more supported accommodation for some groups with the help of other organisations, for example more homes for those leaving prison. However, significant gaps remain for others, such as those leaving hospital with poor physical or mental health.

Rough Sleeping

There has been a considerable improvement in resources available to help rough sleepers in Chelmsford over the lifetime of the last strategy, including:

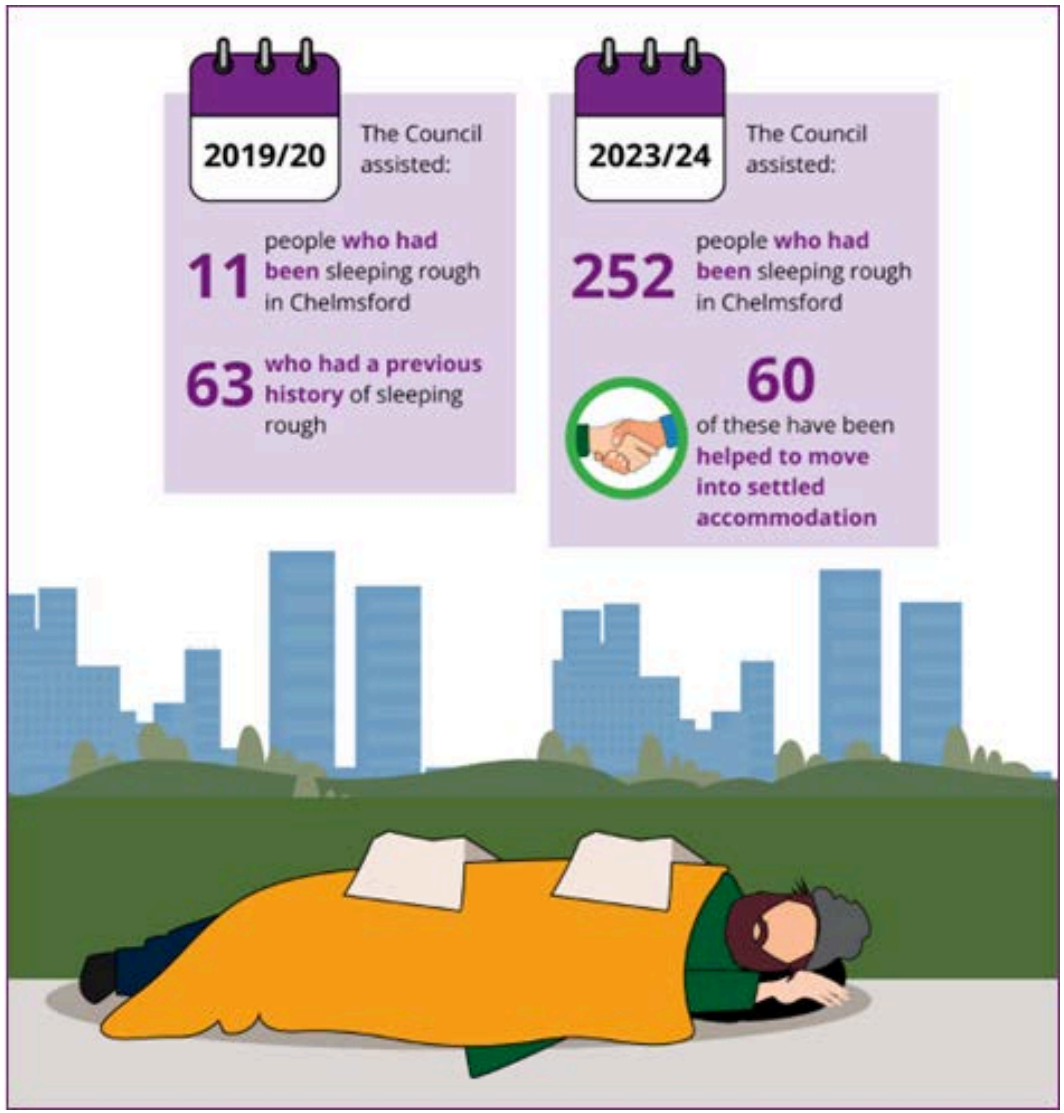
- **46 additional bedspaces** with support funded through the Rough Sleeper Accommodation Programme (RSAP) and Rough Sleeper Initiative (RSI), and an **additional 24 places planned for 2025**

- **12 additional bedspaces for those who become homeless after leaving prison** funded by the Accommodation For Ex-Offenders (AFEO) programme.

A local team of Rough Sleeper Navigators and Coordinator funded through the RSI programme, along with an outreach service for anyone reported as a rough sleeper through the Streetlink website.

A dedicated mental health support worker jointly commissioned by Essex Partnership University Trust (EPUT). Alongside this, is the invaluable contribution made by local charities and voluntary groups, who together with Chelmsford City Council, work together as part of Chelmsford's Single Homeless Forum.

Whilst supportive of the government's aim to end rough sleeping we recognise through our experience over the last five years that there is always a risk of some people finding themselves having to resort to sleeping rough. Therefore, we aim to help them move off the streets of Chelmsford into accommodation as quickly as possible.



Many will be unaware of what help and support exists in Chelmsford. The first thing **we need to do is make sure we have an effective way to engage with new rough sleepers as quickly as possible**, promoting and using Streetlink as a source of information about any people sleeping rough in our city and working with local charities and other agencies to make contact.

We then need a supply of accommodation, often with support, that can be accessed as quickly as possible to help people move off the streets. Support is critical at this stage, as many people have other problems that can lead to them becoming homeless. Without help to overcome these challenges, some of which may be deep seated, there is a high risk that they will become homeless once again.

The number of people helped each year in Chelmsford demonstrates how effective this system is, but there is a small number who have become entrenched as rough sleepers despite offers of help and accommodation. In almost all of these cases there is a need for considerable levels of support just to build up trust and engagement. Any offer of accommodation will need to provide a similar level of high support, at least for the early stages, with a recognition that many will regress back at times. It is the ability to have accommodation and support that recognises this as part of the pathway to recovery that is so important.

Through this strategy and our work with partners **we aim to:**

- **provide longer-term supported accommodation for those who need more time to prepare for living independently**, and
- **re-establish the Home First scheme for those needing a high level of support** and time to adjust to living away from the streets and the problems they have experienced.



Prevention and relief of homelessness

The Homelessness Reduction Act formalised the work we previously did to prevent homelessness whenever possible. Under the Act, prevention means preventing homelessness so someone is able to remain in their existing home or can be helped to find somewhere else before they have to leave. Relief from homelessness means that although they have lost their home and become homeless, they have been helped to find somewhere else so the Council does not then have a duty to consider if they need other settled accommodation and temporary accommodation in the meantime.

Over the last five years, performance in prevention and relief of homelessness has remained consistent, as shown in the table below:

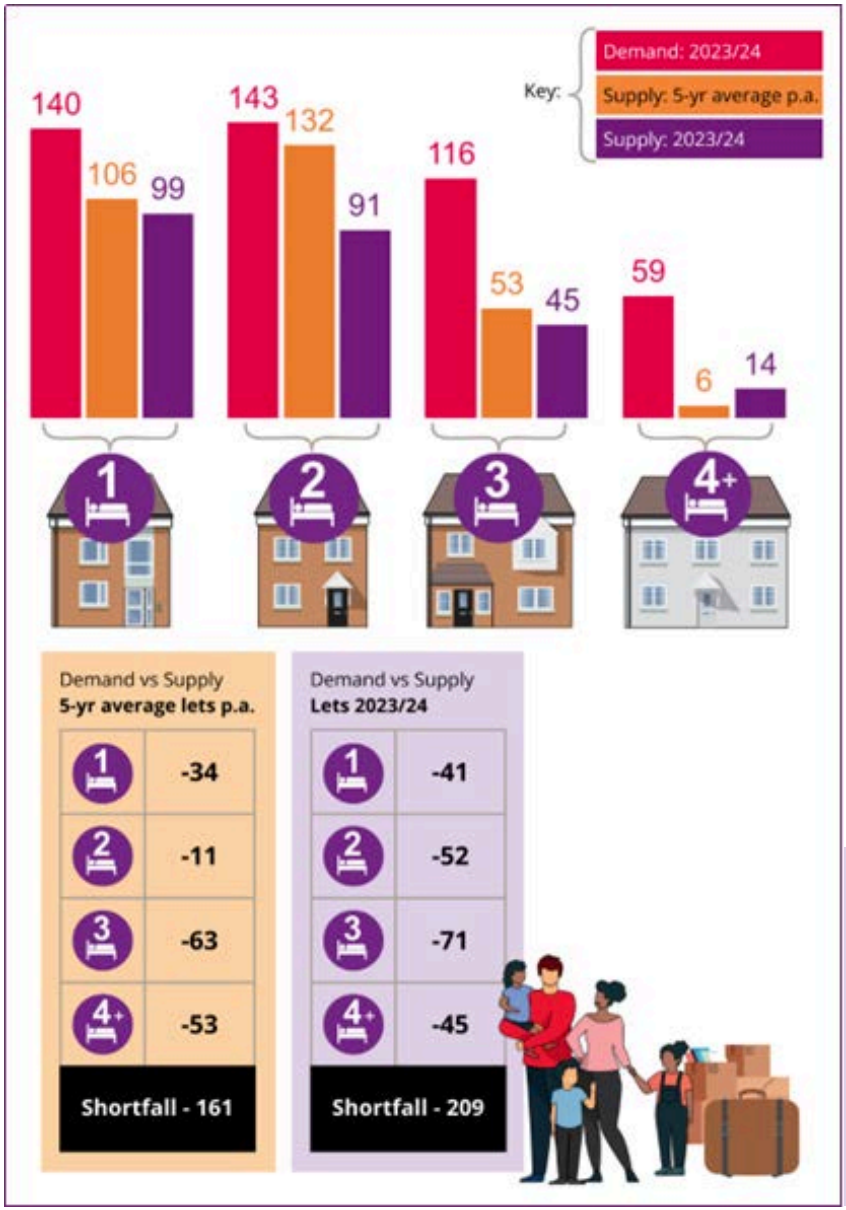
Number of successful cases	2019/20	2023/24	Change
Prevention	248	213	-35
Relief	96	112	+16
Total	**344**	**325**	**-19**

Naturally, we would like to be able to prevent more cases of homelessness, but this has to be seen in the context of a more challenging situation. There are rising levels of homelessness (more applications and growing levels of complexity) and a reducing supply of alternate options as the supply of affordable and supported housing reduces and the cost of private rent exceeds what many on lower incomes can afford.

As part of our renewed strategic approach we aim to improve awareness of the growing gap between the need and supply of affordable and supported accommodation in Chelmsford. This will link to our Housing Strategy which aims to improve the supply of both these options. We believe that by having a better and wider understanding of this problem:

- **Local residents will recognise the need to seek help and advice as soon as possible**, giving more time to see how homelessness can be prevented and encouraging more flexibility over options to relieve homelessness; and
- **Local partners will recognise the need and importance of early referrals of those they are working with**, along with the need to work together to prevent homelessness whenever possible. Even though current accommodation may not be ideal, it may still be preferable to the consequence of becoming homeless and having to move into temporary accommodation.

Temporary accommodation



An inevitable consequence of rising need and reducing supply has been an increase in the number of households having to live in temporary accommodation. There will always be a need for emergency accommodation, for example when families are made homeless due to fire or flood, or other cases when there has been no prior warning of someone becoming roofless and time is needed to investigate their circumstances.

In March 2024, there were 458 households in temporary accommodation. Two-thirds of these had been accepted under the main duty of needing settled accommodation and were waiting for a suitable home to become available. **By March 2025, the number had risen to 500,** but this shows a slow down in this rate of increase as we put more resources into the management of temporary accommodation.

Improving the supply of affordable homes is an objective of the Council's Housing Strategy and there have been some improvements as a result of this, in particular improving the supply of larger family homes and temporary accommodation in Chelmsford. Despite this, the gap between the need and supply of affordable homes continues to grow, which highlights how critical the prevention of homelessness is.

The graphic (left) below shows the number of households by bedroom size in temporary accommodation at the end of 2023/24, alongside the supply (lettings) of affordable homes in 2023/24 and the average supply over the last five years.

- **458 total in temporary accommodation (2023/24)**
- **249 total lettings (2023/24)**
- **297 total average 5-year annual lettings (2019-2024)**

The Council has invested in additional temporary accommodation over the lifetime of the previous Homelessness Strategy. All of these homes are in Chelmsford which reduces the impact of disruption to families.

The current portfolio of Council-owned temporary accommodation is:

- **57 two, three, and four-bedroom homes owned by the Council.**
- **79 one, two, three and four-bedroom homes leased by the Council from private landlords**
- **18 one and two-bedroom modular homes**

This provides a total of 154 properties. In addition to this, there are also 56 homes owned and managed by local Registered Providers also all in Chelmsford.

This total of 206 properties would be more than enough to meet the needs of those who need temporary (or interim) accommodation pending enquiries to establish whether or not there would be a permanent duty to accommodate. It is the reduction in the supply of general needs affordable homes to rent which is causing the growing backlog and number of households in temporary accommodation.

The additional need is currently met by private providers who make properties available at a daily rate, often referred to as 'nightly lets'. Most of these are also in Chelmsford but there is a finite number and we are increasingly having to place people into nightly let accommodation outside of Chelmsford.



In 2024 the Council introduced a new Temporary Accommodation Placement and Procurement Policy (weblink to be added) which provides more information on how we will ensure there is an adequate supply of temporary accommodation that meets the needs of those who are homeless and the legal duties of the Council.

Throughout the lifetime of this new strategy we want to continue to increase the supply of more affordable temporary accommodation in Chelmsford, improving the quality and reducing the cost. We also aim to increase the supply of supported accommodation, which for many of the most vulnerable who become homeless will be a better alternative.

Supported and specialist housing

Ten most prevalent support needs for 2022/23:

Support requirement	Cases	%
1. Mental health	**311**	**31.1%**
2. Physical ill health & disability	**212**	**21.2%**
3. Domestic abuse	**146**	**14.6%**
4. Learning disability	95	9.5%
5. Repeat homelessness	78	7.8%
6. Abuse (not domestic)	71	7.1%
7. Offending	71	7.1%
8. Rough sleeping	70	7.0%
9. Access to education and training	62	6.2%
10. Drug dependancy	36	3.6%

Many people who become homeless have a need for support as well as accommodation. Everyone who becomes homeless and is helped by the Council will have a Personal Housing Plan and as part of this we identify where there may be a need for support.

These are the principal support needs identified by applicants and in some cases there may be more than one support need, but this still gives a good indication of the most common problems many of those who are homeless in Chelmsford face. This helps us match the supply of supported housing alongside the likely need. Our Housing Strategy sets out the following actions, which remain relevant:

(1) Complete the programme for providing supported accommodation for those at risk of rough sleeping

Since 2022, we have worked with partners to double the amount of supported accommodation for rough sleepers in Chelmsford. In 2024/25 we hope to see an additional 24 new units provided by CHESS as part of the Single Homeless Accommodation Programme (SHAP). We also want to replace the 8 units of high-level support that were provided as a Housing First scheme by Home Group until March 2024.

(2) Identify opportunities and bring forward plans to meet the needs of those who need support and accommodation due to mental ill-health

We have not been able to make progress so far with this action and want to identify partners who can help us meet this objective as we have no nomination rights to any schemes like this despite the large number of homeless people who identify themselves as needing this support. Over the period of the strategy's consultation, we have begun to work with specialist housing associations and national charities who have expertise in mental health to gain a better understanding of possible opportunities to meet this need.

Chelmsford City Council

(3) Provide suitable temporary accommodation for those with physical disabilities and publicise the Disabled Facilities Grant

There are very few properties suitable for wheelchair use which can be provided at short notice for those who become homeless. As we are seeing a growing number of people who are homeless as the result of leaving hospital with this need we must continue to work to achieve this aim.

(4) Ensure there is an adequate supply of specialist accommodation for those experiencing domestic abuse

There are only 12 places in the local refuge suitable for families and 4 other bedspaces for single people, which is only one-tenth of the annual number who are homeless as a result of domestic abuse. There is clearly a need for more safe accommodation with support in Chelmsford to meet the needs of a diverse range of households.





(5) Improve the provision of temporary accommodation for young people

Although we do not have an especially large number of young homeless people, those who do become homeless may be particularly vulnerable and in need of additional support in homes where there is some additional protection from older people. We will continue to work with partners such as the YMCA to progress plans for improving this provision.

Section 4:
Developing our strategy



Taking into account our review of homelessness in Chelmsford, existing plans and strategies and our ambitions, we now seek feedback to help us prepare a final version of a new Homelessness and Rough Sleeper Strategy, including actions to be delivered over the next five years.

1. Rough Sleeping

Continue to develop a more comprehensive and evidence-based approach to reducing the need to sleep rough by:

A. Recognising the distinction between those who are new to rough sleeping whose main need is accommodation, those who experience repeat homelessness and may need a higher level of housing with support, and those who are entrenched and whose primary need is access to specialist support whilst sleeping rough.

B. Replacing the provision of accommodation and support of the eight units previously provided by Home Group as on a 'Housing First' basis

C. Refining the links between the Council's Rough Sleeper Navigators and CHESS outreach service to get the best outcome from these two services.

D. Developing a wider range of supported accommodation for single people to reduce the need for temporary accommodation.

E. Improve awareness of local services to help those sleeping rough, and communication and cooperation between these organisations so they are helped to understand and respond to gaps in services.

2. Domestic abuse

Domestic abuse spans various agencies and issues. It needs a multi-faceted approach, working across several fields of expertise including the criminal justice system, housing management, adult and young people's social care and the voluntary sector using the Domestic Abuse Act as a framework for partnership working.

We have seen how a focus on rough sleeping over the last five years has transformed this aspect of homelessness in Chelmsford and we now want to adopt a similar approach to those at risk of homelessness due to domestic abuse, including:

A. Better use made of existing supported housing to allow people time to understand their options and make informed decisions;

B. Better understanding of housing pressures and options across various agencies to stimulate more innovation and development of housing options and support for those at risk of homelessness;

C. Innovation in dealing with perpetrators to make them rather than their victims responsible for their actions, removing them rather than others from the home;

...continued on next page..

2. Domestic abuse continued..

D. Developing local reciprocal arrangements to enable victims to retain a like-for-like home if they can not be helped to remain safely in their current home;

E. Better supply of safe accommodation for a more diverse range of people to eliminate the risk of exclusion;

F. Better provision of support to those who have to be placed into generic temporary accommodation.

G. Create a forum of local service providers to improve the quality of support to those at risk of abuse and homelessness, improving cooperation and opportunities

3. Mental health

A. Retain and expand the pilot scheme of providing support to single homeless through the Mental Health Navigator with EPUT

B. Develop accommodation with support for those who are at risk of homelessness and suffering with mental health to avoid the risk of rough sleeping.

4. Young People

A. Continue to develop plans with partners for supported housing for young people to avoid the need for temporary accommodation.

5. Temporary accommodation

A. Progress plans for the procurement and management of temporary accommodation in Chelmsford to improve the quality and reduce the cost.

B. Work with partners to improve the level of support provided to those placed into temporary accommodation, especially where this has to be outside of the Chelmsford district.

C. Explore the opportunities to create housing with support for vulnerable families as an alternative to temporary accommodation.

D. Progress plans to provide temporary accommodation that is suitable for people with physical disabilities.

Section 5:
Strategy Consultation



What have we learnt from our consultation?

A draft version of this strategy was published last autumn and since then we have engaged with people through the use of surveys, workshops, and face to face meetings including with those who have recent lived experience of becoming homeless in Chelmsford. We have also continued to monitor data and compared this with national and local data to see if and where homelessness in Chelmsford varies.

Rough sleeping

There is a clear distinction between those who are new to sleeping rough in Chelmsford and those who have been sleeping rough over many months, even years. The main need for most of the former is access to affordable accommodation with a low level of support, which we have increased during the lifetime of our previous strategy. For the latter, although homeless, their needs are often more complex and in some cases yet to be assessed and identified.

- **We have managed to keep levels of rough sleeping stable over the last few years, even though numbers have increased nationally by 20% in the last year alone.**

- **We aim to retain existing services which focus on reducing the time those new to rough sleeping spend on the streets.** By re-launching the Housing First scheme, which ended in 2023, we will provide the best opportunity for some of the smaller number of the most entrenched rough sleepers in Chelmsford to also move on.

- **Nearly one in four of those with a history of rough sleeping become homeless once again in the future.** To prevent this, we want to work with those who provide support to help those currently living in supported and temporary accommodation be better prepared for managing a tenancy when they move on.

- **Often those who find it harder to move away from sleeping rough in Chelmsford have a need for support which requires more specialist help along with accommodation.** For example, those who have been victims of domestic abuse, have a history of mental health or substance abuse. Developing an additional supply of other forms of supported housing would help, and could be an opportunity to prevent others from becoming homeless.

Domestic abuse

Chelmsford has three times the national level of homelessness caused by domestic abuse but a large proportion of this is the result of people presenting from other areas.

Learning from the approach we took in our previous strategy for tackling rough sleeping, we want to establish a local group of organisations to improve understanding and coordination in response to those who are at risk of homelessness for this reason.

This will help us, amongst other things, create a better supply of safe accommodation that provides specialist support as an alternative to temporary accommodation.

- The Domestic Abuse Act requires us to provide safe accommodation to all those who become homeless due to domestic abuse. However, for the majority of these cases, including some of the most serious, the main option is conventional temporary accommodation, so **we urgently need to increase the supply and access to housing that is safe with support.**

- The critical lack of suitable affordable homes means we must seek to improve to prevent this as a cause of homelessness, working with others to protect existing accommodation as well as the families to reduce the impact of homelessness. **We shall** therefore **begin to look at ways we can remove perpetrators instead of victims from family homes, work with Registered Providers to transfer instead of evicting their tenants and provide realistic and comprehensive information about housing options** so victims can make informed decisions.

- **We also need to work to eliminate the risk of anyone needing safe accommodation from being excluded**, due to their sex, ethnicity, household composition or for other reasons.



Mental health

The majority (around 80%) of single people who are accepted as statutorily homeless will have a need for support due to their mental health.

- **We want to find a way to re-establish the Mental Health Navigator role** which helps with the assessment of those who are homeless and reduces delays in them accessing support and treatment.

- **Many will need supported housing to aid their recovery and help them prepare for living in general needs housing** if we are to prevent further cases of homelessness and a deterioration in their health and welfare, sometimes leading to serious risk of harm.

- **We therefore also aim in the lifetime of this strategy to enable a supply of supported accommodation specifically for those with this need for support**, reducing the reliance on temporary accommodation and improving the prospects of those at risk.

During the consultation of this strategy Essex County Council has withdrawn funding of Accommodation Based Housing Related Support for two schemes in Chelmsford. These have been invaluable in meeting the need of supported housing for single homeless, many of whom suffer with poor mental health. Chelmsford City Council intends to meet the cost of retaining this support in order to avoid the need to be reliant on generic temporary accommodation for this group.



Young people

Levels of homelessness in Chelmsford for this group are proportionately similar to other areas but there is no specialist accommodation.

Young people leaving care are at higher risk of homelessness, exploitation and harm. Many other young people may not be taken into care but are also vulnerable to similar risks.

- **We will be supporting the development of a Foyer scheme in Chelmsford** which could provide safe accommodation for young people with support to help them prepare and move on into their own independent home.



Families

Two thirds of those in temporary accommodation are families with children. In the majority of cases, this is due to the shortfall in supply of affordable family-size housing in Chelmsford, which is being addressed in our Housing Strategy.

Some families are at a higher risk of homelessness, such as single parents in privately rented accommodation, especially those affected by the benefit cap.

- **We will continue to work with our partners,** Essex County Council's Families Team and the Department of Work and Pensions **to help these parents access training and employment**, improving their income and reducing the risk of homelessness.

- **We will also review the role of our Tenancy Sustainment Officer**, ensuring we are helping families as soon as possible so we can prevent them from the risk of eviction.

- In recognition of how different this group is from rough sleepers and single homeless, **we also want to re-launch the Homeless Families Forum**, raising awareness and understanding of the risks of homelessness and ways we can work together in Chelmsford to support these families.

Young people

Since the publication of our previous strategy, Chelmsford has become home to families displaced by wars in Syria, Afghanistan and Ukraine. Each, in turn, has created a larger number of people presenting as homeless and innovative national policies and programme to provide assistance that have helped reduce the number of homeless households.

Currently, all families from Syria and Afghanistan, including those who were previously living in temporary accommodation provided by the Home Office in Chelmsford, are now living in settled accommodation.

- There remain around 40 Ukrainian households still living with their sponsors under the Homes for Ukraine scheme in Chelmsford. **We estimate around 100 Ukrainian households have been helped to move on, preventing homelessness or after living in temporary accommodation.**

- Throughout this period **we have built links with a number of voluntary and statutory organisations.** We shall continue to develop this network of mutual support to help us meet the needs of other refugees. It is not usually possible to prevent homelessness in this case, but we have found it necessary to manage expectations with these agencies so we can work together on providing suitable housing options that are realistic.

Ex-offenders

This is a relatively small group but often impacts on a number of organisations and can be a complex area of work.

- **Working with the Ministry of Justice we have been able to enable accommodation with support in Chelmsford** for those who have become homeless as a result of leaving prison. This has helped reduce the level of rough sleeping and re-offending.

- **With additional funding in 2025/26 we hope to recruit a Housing and Probation Navigator**, enhancing the level of joint work between our two organisations. This post will help us develop and hopefully expand existing provision as well as extend our ability to prevent homelessness for this group.



Substance abuse

As with ex-offenders, this is a small number, but often with high and complex needs.

- In consultation with others **we have identified the need to develop and improve the way our Rough Sleeper Navigators work** with services commissioned by Essex County Council, ideally extending this beyond helping those sleeping rough to supporting them as they move into and on from temporary and supported housing into independent living.

- The need for accommodation for those embarking on a **programme of detoxification and rehabilitation** has been identified as part of the consultation process. This is not something that a local housing authority is resourced to provide or responsible for commissioning but **we have given a commitment to our partners to support them in exploring the feasibility of such a scheme.**

Temporary accommodation

Conventionally this has been incidental to the main issues covered by Homelessness Strategies but **we can no longer consider the costs (financial and social) tolerable. Nor can we overlook the risk of this supply being exhausted within the lifetime of this strategy.**

Temporary accommodation continued..

- Throughout our consultation, the need for a better supply of supported housing has been highlighted. **We are preparing for the implementation of the Supported Housing (Regulatory Oversight) Act 2023 and expect to be preparing a strategy outlining the need and supply within 12 to 18 months from the launch of this strategy.** We do not know what additional funding may be available to develop additional properties for unmet need in the future, but this would be a better option than temporary accommodation for many.

- In the meantime, **we will continue to improve the quality and reduce the cost of temporary accommodatio**n as outlined in our action plan.

- **We shall also continue to review performance** in the management of temporary accommodation.

- **From April 2026, a new rent and charging policy** creates a fairer and more transparent system for those in temporary accommodation. This also **helps streamline the management of properties and we hope reduces the time and cost enforcing agreements.**

Communication

Our consultation has revealed how unaware many people are of the housing situation in Chelmsford, whether applicants, voluntary or statutory organisations.

- Whilst we acknowledge our responsibility as a Local Housing Authority to understand and respond to the need for housing, as this strategy highlights, **tackling homelessness inevitably requires a multi-agency approach** and therefore a common understanding of the key issues.

- Over the last few years we have managed to slow down the decline in supply of affordable homes and the increase in the need for temporary accommodation but **the longer term forecast indicates that the gap between the need and supply of affordable homes in Chelmsford – and therefore homelessness – will remain as challenging as it is today throughout the lifetime of this new strategy.**

- **We have therefore begun to pilot ways to explain as clearly as we can the reasons for people becoming homeless in Chelmsford, along with the problems we face in relieving their homelessness.** We hope that this will help with two outcomes: a greater realisation of the importance of preventing homelessness, and an increase in engagement from all partners to commit to the aims of this strategy.



Section 6:
Our Ambitions



1. Universal prevention

- **Improve communication** about the housing situation in Chelmsford to help our partners understand and manage expectations, recognise the importance of prevention and the consequences of becoming homeless.
- **Continue to work with and expand the work of Chelmsford's Single Homeless Forum and Homeless Families Forum**, sharing and promoting good practice and highlighting those most at risk and in need of help.

2. Targeted prevention

- **Develop a multi-agency strategic approach** to reducing homelessness for those at risk of domestic abuse
- **Work with partners to provide advice and support to others who are more likely to experience homelessness:** single parents in privately rented accommodation, refugees from Ukraine, asylum seekers granted leave to remain, those who have previously experienced homelessness.
- **Review and develop the role of our Tenancy Sustainment Officer** to help those at risk of eviction.



3. Intervention and recovery through partnership working

- **Continue to develop our work with those accommodated through the Homes for Ukraine scheme** and explore how this could be expanded to help other refugees:
- **Develop more options with partners to support vulnerable households** in temporary accommodation;
- **Extend the work of the Mental Health Navigator**;
- **Review and develop the Accommodation for Ex Offenders (AFEO) scheme** with probation service and others.
-

4. An integrated approach to local housing options

- **Implement, review and develop our policy for the use of privately rented accommodation** as an alternative to social housing for those accepted as homeless;
- **Implement, review and develop our Temporary Accommodation Placement and Procurement policies**
- **Renew our Tenancy Strategy** with registered providers to make best use of existing housing stock;
- **Prepare and implement the requirements of the Supported Housing Act**





Action Plan 2025-2030

Chelmsford City Council

(1) Rough Sleeping					
	Issue	**Action**	**Resources**	**Partners**	**Timescale**
1.1	Entrenched rough sleepers	Re-launch Housing Led approach for those who have not engaged with other existing options	Revenue funding for CHP support worker – MHCLG + CCC	CHP and other registered providers, MHCLG	New scheme agreed with partners 2025/26. Operational by 2026/27
1.2	Complex needs	Ensure everyone sleeping rough in Chelmsford has access to diagnosis and support for mental health, substance abuse, risk of offending through closer integration between agencies	CCC Rough Sleeper Navigators, ECC DAS Team, Probation Service Revenue Funding: NHS, MHCLG, Probation, Sanctus and other voluntary organisations	CCC, ECC Social Care, ICB, Probation	Review existing agreement with ECC April 2025. Consider need for further development of scheme and funding requirement for 2026/27
1.3	Prevention of future homelessness	Provide extended accommodation and support in 24 new homes for those who have more complex needs to prepare for independent living – reducing the risk of repeat homelessness	MHCLG – SHAP Funding CCC – capital grant CHESS – fund raising	MHCLG, CHESS, CCC	New units for allocation from summer 2025
1.4	Coordination of outreach services	Review and adjust existing services to ensure best use of resources and outcomes	Existing resources	CCC, CHESS, ECC	Summer 2025

(1) Rough Sleeping					
	Issue	**Action**	**Resources**	**Partners**	**Timescale**
1.5	Better coordination and planning of services for rough sleepers provided by statutory and voluntary organisations	Support for and sign up of a local charter to reduce rough sleeping in Chelmsford	Within existing resources	Chelmsford Single Homeless Forum	Overseen and supported by CCC (Rough Sleeper Coordinator)



(2) Domestic abuse					
	Issue	**Action**	**Resources**	**Partners**	**Timescale**
2.1	Better cooperation between commissioners, providers and other agencies to improve the quality and quantity of services to prevent and relieve homelessness	Create a local multi-agency Domestic Abuse Forum	Within existing resources	CCC	Better cooperation between commissioners, providers and other agencies to improve the quality and quantity of services to prevent and relieve homelessness
2.2	Eliminate the risk of exclusion of victims from existing and future provision	Work with partners on review of existing provision to identify and plan for those who may be excluded due to protected characteristics	Within existing resources	Accommodation providers, Vol orgs, Review of case reviews	Autumn 2025
2.3		Ensure appropriate support is provided to those who have to be placed into temporary accommodation by quantifying need and consulting with partners on options for providing additional support.	Domestic Abuse Act funding Homelessness Prevention Grant	ECC Registered Providers, Domestic Abuse charities, Essex Police, Fire and Rescue	Review and assessment – autumn 2025 Extended support – spring 2026

(2) Domestic abuse					
	Issue	**Action**	**Resources**	**Partners**	**Timescale**
2.4	Better supply of safe instead of temporary accommodation	Work with partners to increase the number of safe places that provide support to those who become homeless due to domestic abuse	Capital and revenue – Homes England, Registered Providers, CCC, ECC	ECC Registered Providers, Homes England, MHCLG	Throughout the duration of this strategy
2.5	Improve the prevention of homelessness for those at risk	Pilot scheme to remove perpetrators from joint tenancies in social housing	Domestic abuse and Homelessness Prevention Grant, Tenancy Access Scheme, Commissioned private landlords	CHP, Police, SETDAB	2025/26
2.6	Improve options for those at risk of homelessness	Create ‘direct access’ accommodation with support so victims can be helped to make informed decisions about their housing options prior to making homeless applications	Better use of existing properties	Registered Providers, Local Housing Charities, CCC Homelessness Officer time, ECC commissioned services	2025/26 and 2026/27

(3) Mental Health					
	Issue	**Action**	**Resources**	**Partners**	**Timescale**
3.1	Reduce the number of people with mental health support need becoming homeless and going into temporary accommodation	Enable additional supply of supported accommodation for single homeless suffering with mental health	Partner RP funding and properties, MHCLG / Homes England funding, Local Authority Grant from CCC	Registered Providers, ECC social care, Integrated Care Board	By 2027
3.2		Explore how to extend existing hospital discharge protocol to include those leaving hospital with mental health support needs	Officer time	NHS / Linden Centre, ICB, ECC Social Care, CCC Homelessness Team	2025
3.3	Reduce the risk of those in temporary accommodation and moving on into settled accommodation from future risk of homelessness	Re-instate role of Mental Health Navigator and explore opportunities to develop additional floating support to prevent and relieve homelessness for those with mental health support needs	New revenue funding	ICB, Social Care, Supported housing providers, MHCLG	End of 2025/26

(4) Families					
	Issue	**Action**	**Resources**	**Partners**	**Timescale**
4.1	Improve access to help and support for families at risk of homelessness	Relaunch Homeless Families' Forum to improve awareness and prevention of homelessness for families in Chelmsford	Within existing resources	Local voluntary organisations and charities, CVS, Registered Providers, Children and Families team	Summer 2025
4.2	Reduce homelessness in Private Rented Sector	Identify ways to target those most at risk of eviction – single parents in privately rented homes affected by benefit cap	DWP funded caseworker	DWP ECC	Summer 2025
4.3	Improve ability to relieve homelessness	Review and maintain programme for improving the supply of affordable family homes through new development and re-lets of housing association properties	Capital investment from Homes England, RP Resources, Local authority grant	Homes England, CHP, Local housing associations	Review autumn 2025

(5) Offending					
	Issue	**Action**	**Resources**	**Partners**	**Timescale**
5.1	Maintain and seek to increase provision of supported accommodation for those who are homeless with history of offending	Secure funding for Accommodation for Ex Offenders (AFEO) programme and opportunities for expansion	MHCLG Funding	Housing Dilemmas, Probation Service, HMP Chelmsford, Private landlords	From April 2025
5.2	Reduce risk of homelessness on release from prison	Review existing protocol with HMP Chelmsford and process for released from court	Within existing resources	HMP Chelmsford Probation, Courts Service, ECC	By end of 2025
5.3	Improve joint working between housing and probation	Appoint Housing and Probation Navigator to support both agencies and their cases with housing options	Ministry of Justice funding	Probation Service Ministry of Justice	Aim to recruit to new role by summer 2025



(6) Young People					
	Issue	**Action**	**Resources**	**Partners**	**Timescale**
6.1	Increase supply of supported accommodation for young people in housing need	Work with YMCA on development of new Foyer scheme in Chelmsford	Homes England, Local authority grant	YMCA, Homes England, ECC	Commencement of scheme in 2026
6.2	Reduce risk of homelessness for young people leaving care	Review and update joint protocol with Essex County Council for care leavers	Within existing resources	ECC	By end of 2025



(7) Substance Abuse					
	Issue	**Action**	**Resources**	**Partners**	**Timescale**
7.1	Improve access to help and advice for those at risk of sleeping rough in Chelmsford	Develop close working arrangements between the Council's Rough Sleeper Navigators and Essex County Council's Drug and Alcohol team	ECC / MHCLG funding	ECC DAS Team	From April 2025
7.2	Identify opportunities for housing with support for those recovering from homelessness and substance abuse	Work with health and social care to assess options and feasibility of accommodation for rehabilitation	ECC Public Health NHS / ICB Homes England / MHCLG. Requirement for revenue and capital	ECC DAS Team, NHS, ICB, Registered Providers, Commissioned health providers	Review progress December 2025



(8) Refugees					
	Issue	**Action**	**Resources**	**Partners**	**Timescale**
8.1	Continue to develop options for those housed under the Homes for Ukraine scheme	Need to plan for those still living with sponsors as access to private rent in Chelmsford becomes more challenging	Home Office / ECC funding	ECC Integration Team, Local voluntary and faith groups, MHCLG, EELGA Strategic Migration Board	Annual review and updated plan in place from August 2025
8.2	Reduce the risk of homelessness for asylum seekers granted leave to remain	Work with other local and national organisations to improve information about local housing options to those seeking asylum living in Chelmsford	Within existing resources	CVS, Red Cross, Clear Springs, Reed Partnership	From April 2025



(9) Temporary Accommodation					
	Issue	**Action**	**Resources**	**Partners**	**Timescale**
9.1	Reduce the use and cost of temporary accommodation	Increase the supply of suitable supported housing to reduce the need to use nightly lets for those who are homeless and in need of additional support	Homes England – capital and revenue, MHCLG – revenue, Local Authority Grant – capital and revenue	MHCLG, Specialist Registered Providers, General Needs Registered Providers	Target of 30 additional units in 2025. Review progress of plans for domestic abuse, rough sleepers, mental health and ex-offenders Oct 2025 to inform future planning
9.2		Increase the supply and use of modular homes for families to reduce the reliance on private providers	MHCLG, Homes England, Local Authority Grant, Council owned land	Suppliers of modular units, One Public Estate / PBH Homes England	30 additional units to be completed by April 2026



(9) Temporary Accommodation					
	Issue	**Action**	**Resources**	**Partners**	**Timescale**
9.3	Reduce the use and cost of temporary accommodation	Review contracting of nightly let providers to reduce increase in costs and maintain access to properties in Chelmsford	Within existing resources	Local letting agents providing temporary accommodation	Quarterly monitoring and annual review from December 2025
9.4		Review and update agreement with CHP for the allocation of their TA units and management of CCC stock	Within existing resources	CHP	New agreements in place from Oct 2025
9.5		Engage with county-wide Test and Learn pilot scheme for better procurement and reduced need for TA	Funded by MHCLG and Cabinet Office	Essex Local Housing Authorities, ECC, MHCLG LGA, Cabinet Office	Outcome of review June 2025



(10) Communication					
	Issue	**Action**	**Resources**	**Partners**	**Timescale**
10.1	Lack of awareness of the problem relieving homelessness in Chelmsford and the importance of prevention	Produce information on the availability of affordable homes on a regular basis for local organisations	Within existing resources	Internal marketing and communications team	From summer 2025
10.2		Produce 'myth-busting' information to address misconceptions about homelessness to explain local issues and manage expectations	Within existing resources	Internal marketing and communications team	From summer 2025

(11) Monitoring and Review					
	Issue	**Action**	**Resources**	**Partners**	**Timescale**
11.1	Need to ensure actions are progressed, continuous engagement with partners and plans are updated and remain relevant to changing needs and demands	Conduct six-monthly review and progress report. Annual review of emerging issues to be included in revised action plans.	To be identified as required	All consultees	Every six months from launch of strategy

Thank you to everyone who has assisted with the development of this strategy and the supporting action plan

- MHCLG Advisors
- Probation Service
- HMP Chelmsford
- Essex Drug and Alcohol Service
- CHP
- CHESS
- Chelmsford CVS
- CRH
- Nadiya
- Homeless Link
- Sanctuary Housing Assoc
- Essex Integration
- EPUT
- Public responses
- Reed Partnerships
- Home Group
- Sanctus
- Safer Places
- Next Chapter
- Essex University Law Clinic
- Essex Police
- Homes England
- Prisoners Building Homes
- Essex PFCC
- EELGA
- Mind
- Red Cross
- Springfield Furniture Project
- Chelmsford Food Bank
- Safe Steps
- Essex Re-Offending Board
- Nacro
- Maldon District Council
- Braintree District Council
- Essex County Council
- CAB
- DWP
- Housing Dilemmas
- Cool to be Kind
- SETDAB
- DCN
- Essex YMCA
- Ideas Hub
- Peabody
- Mid Essex NHS
- Local churches
- Phoenix Futures

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https://forms.chelmsford.gov.uk/contactus-housing/



Chelmsford City Council

CHELMSFORD POLICY BOARD WORK PROGRAMME

26 June 2025
- **Review of Local Plan - Consideration of Pre-Submission Local Plan (Regulation 19) and Integrated Impact Assessment (IIA) consultation feedback** - **Homelessness and Rough Sleepers Strategy (recommendation to Cabinet)**
25 September 2025
- **Revised Draft Planning Obligations Supplementary Planning Document – consultation feedback** - **Other Reports tbc**
6 November 2025
- **Review of Local Plan - Agreement to submit the Local Plan (Regulation 22) and Integrated Impact Assessment (IIA) for Independent Examination (recommendation to Full Council)**
15 January 2026
- **Reports tbc**
19 March 2026
- **Reports tbc**
Standing or other items not currently programmed
- **Recommendation and referral to Full Council to adopt the review of Local Plan (Regulation 26)** - **Recommendation to adopt the revised Planning Obligation SPD (Regulation 14)** - **Agreement to consult on new and updated Supplementary Planning Documents**