HS011 Matter 11

Chelmsford Local Plan

Examination Hearing Statement – Monitoring and Review

November/December 2026



Chelmsford Local Plan

Introduction

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

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

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

Matter 11 – Monitoring and Review	
Q11.1	**Are the monitoring indicators adequately linked to the Plan's policy objectives and will they enable the Plan to deliver the intended outcomes?**

CCC Response to Q11.1

4. It is the Council's position that the monitoring indicators are adequately linked to the Plan's policy objectives and will enable the Plan to deliver the intended outcomes.

5. Most of the monitoring indicators were established following the examination of the 2020 Local Plan with modifications made by the Inspector to provide sufficient details and clarity to be effective (**OSP016**, paragraph 270-271, page 44-45, MM93 page 61 (pdf page 107) and Annex 4, page 124).

6. The indicators have been drafted to ensure that they can identify whether policies are achieving their intended outcomes or targets, so that corrective action can be taken if required. They are derived directly from the key outcomes that the Local Plan seeks to achieve. Where possible they focus on outcomes rather than activity levels and rely primarily on data that is routinely collected through established sources to ensure that indicators can be reported consistently throughout the Local Plan period.

7. Where appeal decisions are used to indicate whether policies are delivering their intended outcomes, the target has a high threshold (all decisions are made in accordance with the policy) and a low trigger (2 decisions allowed on appeal) to require determination of whether the Local Plan Policy is meeting its objectives. The reporting of these decisions in the Authority Monitoring Report enables the Council to keep all appeal decisions and their unintended or intended outcomes under review (**LDS019**, page 50 (pdf page 52).

8. Modifications **(MOD Ref 331, 334, 335 and 336)** on pages 94 and 95 (pdf pages 95 and 96) in **(SD005)** Schedule of Proposed Modifications are required to correct some

previous errors in the indicators referenced in the monitoring framework or update them where Policies have subsequently been updated.

9. The monitoring indicators relate to the policy objectives and help identify whether intended targets or outcomes are being achieved so are considered effective when modifications (**MOD Ref 331, 334, 335 and 336)** are applied.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
331	319		Monitoring Framework Strategic Policy S14	*Amend Key Indicators:* Number of Health Impact Assessments on development for 50 or more dwellings, Use Class C2 (Residential Institutions) and non-residential development ~~in excess of~~ 1,000sqmm2 or more (excluding agricultural buildings)	To reflect Policy changes
334	330		Monitoring Framework Policy DM16	*Amend Key Indicators:* Number of development proposals that include a biodiversity net gain above the existing ecological baseline value of the site ~~over a minimum 30 years after completion~~	Correction
335	331		Monitoring Framework Policy DM17	*Amend Key Indicators:* Number of ~~new trees per~~ net new dwellings that comply with three new trees	Correction
336	331		Monitoring Framework Policy DM17	*Amend Key Indicators: Number of net new trees per net new strategic scale employment and infrastructure development ~~in excess~~ of 1,000sqm or ~~0.1 hectares~~more*	To reflect Policy changes

Q11.2	**Are the monitoring targets consistent with the Plan's Policy requirements and supporting evidence?**

CCC Response to Q11.2

10. It is the Council's position that the monitoring targets are consistent with the Plan's policy requirements and supporting evidence.

11. The monitoring targets are consistent with the Local Plan's policy requirements and supporting evidence because they are derived from the same evidence base that has informed the policies in the Local Plan.

12. The targets reflect the level of development, infrastructure provision and environmental outcomes that the Local Plan seeks to achieve and provide a measurable means of assessing whether policy implementation is delivering the anticipated results.

13. While some long-term outcomes, such as health improvements and biodiversity recovery, are influenced by factors beyond the planning system, the selected indicators provide a reasonable and proportionate basis for assessing the Local Plan's contribution towards achieving these objectives.

14. Where appropriate, targets are based on adopted policy requirements, identified needs, national standards or locally derived evidence. Where appeal decisions are used to indicate whether policies are delivering their intended outcomes, the target has a high threshold (all decisions are made in accordance with the policy) and a low trigger (2 decisions allowed on appeal) to require determination of whether the Local Plan Policy is meeting its objectives. The reporting of these decisions in the Authority Monitoring Report enables the Council to keep all appeal decisions and their unintended or intended outcomes under review (**LDS019**, page 50 (pdf page 52).

15. Modifications **(MOD Ref 330, 334 and 335)** on pages 94 and 95 (pdf pages 95 and 96) in **(SD005)** Schedule of Proposed Modifications are required to correct some previous errors to targets in the monitoring framework or update the framework where Policies have subsequently been updated.

16. Overall, the monitoring targets provide a realistic, evidence-based benchmark against which the effectiveness of the Plan can be assessed throughout the Local Plan period.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
330		79	Monitoring Framework Strategic Policy S7	*Amend Targets:* **Growth Area 1:** Net new homes – 4,521 ~~4,535~~ ~~4,476~~ **Growth Area 2:** Net new homes – 7,502 ~~7,201~~ ~~7,501~~ **Growth Area 3:** Mixed employment sqm – 90,805 ~~87,200~~ **Growth Areas 1 – 3:** Windfall Allowance 2028~~7-~~ 2041 – 2,218 ~~2,362~~ ~~2,373~~	To reflect Policy changes
334	330		Monitoring Framework Policy DM16	*Amend Target:* Unless exempt, all the development proposals should provide a minimum 10% biodiversity net gain (20% on Chelmsford Garden Community and East Chelmsford Garden Community) above the existing ecological baseline of the site ~~over a minimum 30 years after completion~~	Correction
335	331		Monitoring Framework Policy DM17	*Amend Target:* ~~Three new trees per~~ ~~n~~Net new dwellings that comply with three new trees	Correction

Q11.3	**Will the monitoring framework remain effective over the Plan period? Are there mechanisms in place to ensure the monitoring indicators and targets are based on up-to-date documents over the Plan period?**

CCC Response to Q11.3

17. It is the Council's position that the monitoring framework will remain effective over the Plan period through regular monitoring and review.

18. The monitoring framework is expected to remain effective throughout the Local Plan period because it is based primarily on indicators that are routinely collected and regularly updated through established monitoring processes and reported annually in the Authority Monitoring Report (**LDS019**). This ensures that performance can be assessed consistently over time and that the framework remains relevant as circumstances change.

19. Monitoring indicators and targets will be reviewed periodically through the Authority Monitoring Report process. Where national policy, legislation, data sources, monitoring methodologies or local circumstances change, the Council can update indicators, baselines, targets or trigger points as necessary to ensure they remain relevant and proportionate. Such changes can generally be made without requiring a review of the Local Plan itself, provided that the overall policy objectives and monitoring purpose remain unchanged.

20. The monitoring framework also includes trigger points and associated actions / contingencies for when performance falls below targets. These ensure prompt consideration is given to whether performance that falls below targets, and desired outcomes, require policies to be reviewed as part of a full or focused formal review of the Local Plan.

21. Modifications **(MOD Ref 331 and 334)** on pages 94 and 95 (pdf pages 95 and 96) in **(SD005)** Schedule of Proposed Modifications are required to update and correct some of the triggers for actions in the monitoring framework.

22. Mechanisms are in place to ensure that monitoring remains aligned with the Plan's objectives when taking into about modifications **(MOD Ref 331 and 334)** and continues to provide a robust basis for assessing the delivery and effectiveness of the Local Plan over the Plan period.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
331	319		Monitoring Framework Strategic Policy S14	*Amend Trigger for action:* Health Impact Assessment is not submitted on one or more development for 50 or more dwellings, Use Class C2 (Residential Institutions) and non-residential development ~~in excess~~ of 1,000sqm~~m2~~ or more (excluding agricultural buildings)	To reflection Policy change
334	330		Monitoring Framework Policy DM16	*Amend Trigger for action*: (1) 20% of development proposals are not achieving the target biodiversity net gain above the existing ecological baseline value of the site ~~over a minimum 30 years after completion~~	Correction

Q11.4	**Is the monitoring framework sufficiently focused on clear outcomes in relation to:** **a. infrastructure provision** **b. healthy communities** **c. sustainable development objectives**

CCC Response to Q11.4

23. It is the Council's position that monitoring framework is sufficiently focused on clear outcomes in relation to infrastructure provision, healthy communities and sustainable development objectives because the indicators are mostly outcome focused.

24. The framework is sufficiently focused on infrastructure outcomes as it measures the actual provision, timing and effectiveness of infrastructure needed to support growth.

25. The key indicators accompanying Strategic Policy S10 Securing Infrastructure and Impact Mitigation monitor the alignment of infrastructure throughout the planning process from masterplan to planning obligations secured in section 106 agreements.

26. The targets against which the indicators are measured are the site-specific requirements identified in the Infrastructure Delivery Plan (IDP) (**INF012** and **INF012-A**), which will be updated annually during the new plan period. Where the amount, type and phasing of infrastructure vary from that stated in the updated IDP (**INF012**), the reasons for this and any imbalance in the type and timing of key infrastructure will be reviewed annually in the Authority Monitoring Report (**LDS019**). The Authority Monitoring Report (**LDS019**) will also include any information on changes to site specific IDPs prepared for the garden communities where relevant (**PostS003** and **SOCG049**).

27. Regarding healthy communities, the Local Plan monitoring framework focuses on outcomes that the policies can reasonably influence. For example, the key indicator relating to Strategic Policy S14 Health and Wellbeing monitors number of Health Impact Assessments (HIA), that have been submitted as per the policy requirements. Where an HIA is required but not received, the monitoring framework requires the Council to consider the reasons for this and whether the same development proposal has tried to secure Livewell Development Accreditation as an alternative.

28. The Livewell Development Accreditation Scheme is not mandatory but is encouraged and offers another means of demonstrating the physical and mental health of residents is promoted when designing and building new development. It cannot therefore be included as an indicator or target to measure whether the potential health impacts of a new development have been considered, but it can be used to review whether the policy objectives have been achieved when the performance falls below stated target i.e. an HIA should have been but has not been submitted.

29. The Local Plan plays other roles in creating healthy communities for example through the encouragement of active travel and the provision of open space. Whilst these outcomes will contribute to long-term health improvements, the main monitoring will be through their provision of relevant infrastructure via the IDPs (as described above), which provides a reasonable and proportionate basis for assessing the Local Plan's outputs and wider contribution towards creating healthy communities.

30. The social, economic and environmental indicators in the monitoring framework measure outcomes rather than outputs with clear targets and triggers for intervention.

31. The social outcome focused indicators include the delivery of homes against identified needs, an appropriate mix of housing including housing for older people and people with disabilities, the provision of affordable housing on threshold sites and through exception sites, as well as provision of healthcare, education, active travel, healthier lifestyles and open space infrastructure.

32. The economic outcome focused indicators include net new employment floorspace delivered against the requirement of Strategic Policy S6, changes of use in ground floor premises within designated centres, skills and access to employment and town centre vitality. The provision of net new employment space alongside new homes means the Council can limit out commuting.

33. The environmental outcome focused indictors include biodiversity net gain, tree provision, BREEAM rating, water efficiency, EV charging points, space heating demand, low carbon fuels, Energy Use Intensity, on-site renewable energy generation and in-use energy monitoring (as modified in response to question 11.1), monitoring changes in environmental conditions and trends over time.

34. In addition, blue and green infrastructure delivery which will be monitoring through the IDPs also contribute significantly to environmental sustainability by supporting biodiversity, improving climate resilience, enhancing water management, protecting natural resources and delivering ecosystems that underpin sustainable development.

35. The monitoring framework is therefore sufficiently focused on sustainable development outcomes. Collectively, the indicators monitor the delivery of homes, employment opportunities, community infrastructure, environmental enhancements and climate change mitigation measures, thereby reflecting the economic, social and environmental dimensions of sustainable development.

36. In conclusion, the monitoring framework has multiple outcome focused indicators that will enable the Council to assess the performance of Local Plan policies that are designed to support necessary infrastructure provision, healthy communities and sustainable development.

Q11.5	**Overall, will the monitoring indicators and targets provide an appropriate and robust basis for assessing the Plan's delivery?**

CCC Response to Q11.5

37. It is the Council's position that the monitoring indicators and targets provide and appropriate and robust basis for assessing the Local Plan's delivery.

38. Overall, the monitoring indicators and targets provide an appropriate and robust basis for assessing the Local Plan's delivery outputs. The framework includes a broad range of indicators that are clearly linked to the Local Plan's strategic objectives and policy outcomes, enabling progress to be monitored across housing, employment, infrastructure, environmental sustainability, climate resilience and healthy communities.

39. The inclusion of measurable targets and triggers for action allows trends to be identified and provides a mechanism for assessing whether the Plan is achieving its intended outcomes

40. The framework is strengthened by indicators that focus on tangible outcomes, such as housing delivery, infrastructure provision, biodiversity enhancement, blue and green infrastructure provision and carbon reduction. These measures should allow the Council to identify under-performance and determine whether corrective action or a review of policies may be necessary as set out in the contingencies/action for each.

41. The effectiveness of the framework is enhanced by the availability of reliable monitoring data, the continued relevance of targets throughout the Plan period, and regular review of indicators where national policy, legislation or evidence bases change, for example the proposed annual update to the IDP (**INF012 and INF012-A**).

42. The monitoring data will be collectively reviewed and reported in the Authority Monitoring Report (**LDS019**) each year and as per Policy S13 Monitoring and Review (**SD001**, page 106), the Council will commence a full or focused formal review of the Local Plan two years after its adoption.

43. The monitoring framework including the modifications set out in responses to questions 11.1, 11.2 and 11.3, provides a sufficiently comprehensive and proportionate basis for assessing the implementation and effectiveness of the Plan and supporting timely policy intervention where required.

EVIDENCE BASE LIST FOR MATTER 11	
SD001	Pre-Submission (Regulation 19) Local Plan Consultation Document
SD005	Schedule of Proposed Modifications (June 2026)
POSTS003	Chelmsford Garden Community Infrastructure Delivery Plan December 2025
OSP016	Chelmsford Local Plan Examination Final Report
INF012	Chelmsford City Council Infrastructure Delivery Plan
INF012-A	Post-Consultation Amendments to IDP in response to MIQs
SOCG049	Statement of Common Ground with Wates Development – Infrastructure
LDS019	Authority Monitoring Report April 2024 to March 2025



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