HS006-3 Matter 6

Chelmsford Local Plan

Examination Hearing Statement – Growth Area 3

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 6 – Growth Area 3 – South and East Chelmsford	
Location 16 **East Chelmsford - Strategic Growth Site Policy 16a - East Chelmsford Garden Community (Hammonds Farm)** **Strategic Growth Site Policy 16b - Land adjacent to A12 junction 18 employment area**	
Q6.3	**What is the current planning status of the site (eg masterplans, permissions, completions)? Have there been any changes since the Plan was submitted for examination and if so, are any modifications needed?**

CCC Response to Q6.3

4. This location comprises two sites, the current planning status for each site is set out below:

Site	**Relevant Masterplan**	**Relevant Planning Application/s**	**Housing / employment numbers**	**Completions on site to date**
Strategic Growth Site 16a	Masterplan and Planning Performance Agreement (PPA) being prepared to be signed with master developer.	N/A	4,500 homes (3,000 within Plan period) 43,000sqm Employment floorspace Use Classes E(g)(i)-(iii)	0

Strategic Growth Site 16b	Conceptual masterplan approved as part of 24/01768/OUT	24/01768/OUT allowed at appeal. S106 agreed as part of decision. Reserved Matters 26/01076/REM, 26/01077/REM and 26/01078/REM Submitted	46,605sqm Use Classes E(g)(i-iii), B2 and / or B8	0

5. There have been no changes to the sites planning status since the Plan was Submitted for Examination.

6. Site 16a is promoted by a single developer, Wates Developments. The following statements of common ground have been signed with the site promoter:
    a. **SOCG046** – Site related matters
    b. **SOCG049** (updated by **SOCG049A**) – Infrastructure matters
    c. **SOCG050** – Masterplan matters

7. The Council is expecting a masterplan to be produced in accordance with the requirements of the site policy. Further information in respect of masterplan progress and required infrastructure is also covered below under Qb for this site. No modifications to the site policy for site 16a are required in relation to the current planning status.

8. Since the Plan **(SD001)** was drafted, planning permission for site 16b was granted at appeal (**Appeal Ref: APP/W1525/W/25/3368272**). This increased the floorspace to 46,605sqm of mixed employment, logistics, storage and distribution uses (use classes E(g)(iii), B2, B8). The basis for the sites scale, mix and type of use should now be modified to reflect this latest capacity. As such **MOD Ref 216, 221 and 222** are proposed in the **Schedule of proposed Modifications SD005 (page 58, pdf page 59) and MOD Ref 220 AMEND** is also required**.**

9. Reserved Matters applications for Site 16b (26/01076/REM, 26/01077/REM, 26/01078/REM) have been submitted for the following: Application for reserved matters of appearance, landscaping, layout and scale relating to APP/W1525/W/25/3368272 / LPA Ref 24/01768/OUT (Outline planning application for a commercial development of up to 46,605sqm of mixed employment, logistics, storage and distribution uses (use classes E(g)(iii), B2, B8) supporting associated development, infrastructure and landscaping. Appearance, landscaping, scale and layout reserved. Access being sought). These are in the process of being determined.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
216	211		Strategic Growth Site Policy 16b	*Amend first bullet point under Amount and type of development:* • Around 46,605 ~~43,000~~ sqm (net) for a mix of employment Use Classes E(g)(i-iii), B2 and / or B8 along with other appropriate ancillary employment generating uses	For effectiveness and to update the latest position
220 AMEND	212		Strategic Growth Site Policy 16b Paragraph 7.386	Amend first sentence and add new second sentence: This site allocation will provide a strategic development of around ~~43,000~~ 46,605 sqm of mixed employment floorspace in Use Classes E(g)(i-iii), B2 and / or B8. The site has outline planning permission for up to 46,605sqm of mixed employment, logistics, storage and distribution uses (use classes E(g)(iii), B2, B8) supporting associated development, infrastructure and landscaping (Ref: 24/01768/OUT). If this permission is not implemented and a new proposal comes forward, the site capacity will be considered on its individual merit.	For effectiveness and to update the latest position
221	212		Strategic Growth Site Policy 16b Paragraph 7.387	*Amend paragraph:* The development of the site will be subject of a masterplan agreed with the Council prior to the determination of a detailed planning application.	For effectiveness and to update the latest position

				A conceptual masterplan has been approved as part of outline planning permission (Ref: 24/01768/OUT).	
222	214		Strategic Growth Site Policy 16b Paragraph 7.400	*Add new fourth sentence and amend last sentence:* Open space requirements have been secured by a Section 106 agreement as part of the approved outline planning permission (Ref: 24/01768/OUT). If this permission is not implemented and a new proposal comes forward r~~R~~equirements for on-site sport, leisure and recreation facilities for employees will be informed by the latest Chelmsford Open Space, Sports and Recreational Facilities Study and Sports Facilities Strategy at the time of any new application.	For effectiveness and to update the latest position

Q6.4	**For the housing sites, what is the basis for the proposed capacity?**

CCC Response to Q6.4

10. The Local Plan policy for Strategic Growth Site 16a states that 4,500 new homes will be provided on the site (3,500 within the plan period to 2041).

11. The housing capacity for the site has been informed by the Council's SHELAA and on-going discussions with the site promoters. Initial information submitted as part of the SHELAA for this site has been tested by the Council throughout the stages of preparation of the Plan, alongside the necessary supporting site uses and site requirements to support the number of dwellings and employment space proposed. As part of this assessment the Council have engaged independent consultants AK Urbanism to advise the Council on the appropriate land budgets, capacity and parameters for the site. This includes the necessary open space, SUDS, educational needs, convenience retail floorspace. This has been led by the TCPA Garden City principles.

12. As part of this assessment the site promoters have submitted various iterations of Masterplans with land budgets, including at the Regulation 19 stage (rep ref PS25-242 refers) which have been independently reviewed by AK Urbanism. While the masterplan and planning process will progress and inform the site further, these plans do demonstrate is that the site is capable of accommodating all the site policy requirements.

13. The final number of new homes will be confirmed through the Masterplan and planning application process.

14. No housing proposed on site 16b so question not applicable to that site.

15. The proposed capacity for this location is therefore considered to be sound.

Q6.5	**For the sites which include non-residential uses, what is the basis for the scale and type/mix of employment and other uses proposed? Is it justified?**

CCC Response to Q6.5

16. The Employment Land Review 2023 (**ECON002**) (and Focused Update 2024 **(ECON003))** and the Retail Capacity Study Update 2023 (**ECON001**) have informed the amount and type of employment and retail floorspace required within the Plan period.

17. Site 16a includes an allocated area for 43,000sqm of dedicated employment floorspace This scale and type/mix is justified by the important contribution the site will make towards meeting employment requirements over the plan period and the Plan evidence base.

18. The site allocation will provide a new large new employment area and make an important contribution to meeting the need for 173,146 sqm of new employment floorspace over the plan period as set out in Strategic Policy S6 – Housing and Employment Requirements and Strategic Policy S7 - The Spatial Strategy **(SD002, page 60)**.

19. The proposed scale and type/mix of employment will meet employment floorspace needs identified in the Employment Land Review Focused Review 2024 **(ECON003)**. The mix of E(g)(i)-(iii), B2 and B8 Uses will help Chelmsford accommodate the predicted growth in economic development and identified need for new jobs which include the business sectors identified in line with Policy S8 (**SD001**, page 81). To ensure flexibility and market responsiveness, other complementary E Use Classes may also be appropriate as part of the allocation, as set out in **paragraph 7.360** of the site policy **(SD001)** page 206.

20. The size of any convenience food shopping within new mixed use centres in site 16a is restricted to no more than 500sqm. This is justified as it is considered an appropriate industry standard which would not lead to an adverse impact on the City Centre and is consistent across the Plan. The Chelmsford Retail Capacity Study 2023 **(ECON001)**, pdf page 81 – 82, found that retail (convenience and comparison) and leisure developments of less than the default national threshold of 2,500sqm could have an impact on existing centres outside Designated Centres and recommends that a 500sqm gross threshold should apply across the whole of the Council's administrative area (for retail proposals outside of designated Primary Shopping Areas and for leisure proposals outside of City/Town Centre boundaries).

21. Proposals over 500sqm would be required to undertake an impact assessment in accordance with Strategic Policy S12 in **(SD001)** Pre-Submission (Regulation 19) Local Plan Consultation Document, page 98 (pdf page 99) in line with the requirements of paragraph 94 of the NPPF 2023.

22. The Council has worked in collaboration with Essex County Council (ECC), the lead authority for Education, to ensure sufficient education places are included within site 16a (including Early Years and Childcare) arising from new development are provided over the Plan period. The education assessments (**INF007 and INF008**) have been carried out in accordance with ECC's Developers' Guide to Infrastructure Contributions (Revised 2024) **(INF015)** and the education requirements included with the relevant site policies under `*Site Infrastructure Requirements'*.

23. The area of land that ECC requires for schools is based on the relevant Department for Education Building Bulletins (i.e. BB103 within the 2024 Guide). In line with its aspiration to increase educational achievement and enhance skills, ECC always seeks site areas towards the top end of the recommended range. Government also encourages 'extended schools' that include other community services and, clearly, larger sites are required if joint use of school facilities is to be considered. In order to produce a school with manageable year groups, ECC may require a small amount of additional land than is indicated by a straightforward calculation of pupils from a development. The following figures are a guide to likely requirements in terms of land and are reflected in the site policy requirements for education.

Type of Education	**Size**	**Land Area (ha)**	**Reference**
Early Years and Childcare stand-alone facility	56 place	0.13 ha	Table 1
Primary School*	2FE (420 places) co-located with commensurate early years and childcare)	2.1 ha	Table 5
Secondary**	8FE (1,200 places)	10.1 ha	Table 6

* The Department for Education guidance document 'Securing developer contributions for education (August 2023)' states that all new primary schools are expected to be co-located with Early Years and Childcare provision, preferably of two forms of entry.

**Land for 6th form provision may be required alongside secondary school sites. On that basis, the figures above include land for 6th form provision.

24. The two sites include employment uses, with 43,000sqm Use Classes E(g)(i)-(iii), B2 and B8 proposed on site 16a and 43,000sqm of mixed use employment floorspace on site 16b. Since the Plan **(SD001)** was drafted planning permission for site 16b was granted at appeal (**Appeal Ref: APP/W1525/W/25/3368272**). This increased the floorspace to 46,605sqm of mixed employment, logistics, storage and distribution uses (use classes E(g)(iii), B2, B8). The basis for the sites scale, mix and type of use should now be modified to reflect this latest capacity. As such **MOD Ref 216** is proposed in the **Schedule of proposed Modifications SD005 (page 58, pdf page 59) and MOD Ref 220 AMEND** is also required**.**

25. Both site allocations will make an important contribution to meeting the need for 173,146 sqm of new employment floorspace over the plan period as set out in Strategic Policy S6 – Housing and Employment Requirements and Strategic Policy S7 - The Spatial Strategy **(SD002, page 60)**.

26. The proposed scale and type/mix of employment will meet employment floorspace needs identified in the Employment Land Review Focused Review 2024 **(ECON003)**. The mix of E(g)(iii), B2 and B8 Uses will provide flexibility to respond to future market conditions over the plan period in line with Policy S8 **(SD001, page 81)**.

27. Further information on the overall site capacities and supporting development requirements are also set out under Qc for this site below. For the reasons set out above the scale and type/mix of other uses within site 16a and 16b is therefore considered to be sound.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
216	211		Strategic Growth Site Policy 16b	*Amend first bullet point under Amount and type of development:* • Around <u>46,605</u> ~~43,000~~ sqm (net) for a mix of employment Use Classes E(g)(i-iii), B2 and <u>/ or</u> B8 along with other appropriate ancillary employment generating uses	For effectiveness and to update the latest position

220 AMEND	212		Strategic Growth Site Policy 16b Paragraph 7.386	Amend first sentence and add new second sentence: This site allocation will provide a strategic development of around ~~43,000~~ 46,605 sqm of mixed employment floorspace in Use Classes E(g)(i-iii), B2 and / or B8. The site has outline planning permission for up to 46,605sqm of mixed employment, logistics, storage and distribution uses (use classes E(g)(iii), B2, B8) supporting associated development, infrastructure and landscaping (Ref: 24/01768/OUT). If this permission is not implemented and a new proposal comes forward, the site capacity will be considered on its individual merit.	For effectiveness and to update the latest position

Q6.6	**Are the development requirements clear, and are any further safeguards or mitigation measures necessary to achieve an acceptable form of development?**

CCC Response to Q6.6

28. It is the Council's position that the development requirements for both sites are clear and consistent with the approach across the Plan. The requirements for each site are clearly set out in the main body of the policy, with supporting Reasoned Justification text to further expand on any further guidance on how these requirements should be met.

29. The Plan should be read as a whole, and other policies assist in the detail of how some of these development requirements should be considered. For example, all site policies note that the infrastructure required within the site policy is in addition to the relevant requirements of Strategic Policy S9, and that financial contributions will be sought in accordance with Strategic Policy S10.

30. The development requirements are clear, and there are no further safeguards or mitigation measures necessary to achieve an acceptable form of development on the two sites.

31. Further information in relation to specific development requirements and mitigation measures for these sites are also covered in response to the site specific Qe, f, l and k below.

Q6.7	**What is the expected timescale and rate of development for the housing sites and is this realistic?**

CCC Response to Q6.7

32. The expected timescale and rate of development is set out in the Housing Site Schedule at Appendix C of the Plan. Sites have been updated with relevant modifications to reflect the latest April 2026 Five Year Housing Site Schedule **(LDS012),** which covers the entire Plan period.

33. The Five Year Housing Land Supply Methodology (April 2026) **(LDS011)** sets out sets out how the Council calculates its five-year housing land supply, but paragraphs 4.1 to 4.15 (page 3-5 of the pdf) set out the combination of methods used by the Council to determine the annual Housing Site Schedule, namely:
    - Regular site visits
    - Information received by Development Management Planning Officers
    - Building Control weekly reports
    - CIL commencement monthly reports
    - Annual confirmation of delivery rates with developers
    - Monitoring completed developments.

34. As set out in the site specific Statement of Common Ground **SOCG046**, page 2 (pdf page 3), the site promoters agree that there are no over-riding issues and constraints to bringing forward this development site in accordance with the trajectory in the Plan.

Q6.8	**Are any modifications to the site policy needed for soundness?**

CCC Response to Q6.8

35. It is the Council's position that the following modifications, as set out in the **Schedule of Proposed Modifications (SD005 page 51 to 59 (pdf page 53 to 60))** and as proposed to be amended in the table below, are required to sites 16a and 16b to ensure the policies reflect the latest position, are justified and effective.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
192	201		Strategic Growth Site Policy 16a	*Amend second bullet point and move to the top of Historic and Natural Environment:* • Prepare a detailed Heritage Impact Assessment to inform the sites masterplanning and placemaking	To ensure the Plan is effective
193	201		Strategic Growth Site Policy 16a	*Amend fifth bullet point under Historic and Natural Environment:* • Preserve and where appropriate enhance the listed buildings ~~and~~ ,associated structures and ~~their~~ settings of Hammonds Farmhouse, and the settings of ~~including~~ Cuton, Stonhams and Little Baddow Locks, ~~Hammonds Farmhouse,~~ Phillows Farmhouse, The Congregational Chapel and Manse, Yew Tree Cottage, St Mary's Church, Little Baddow Hall, Boreham House, Generals, Water Hall, St Johns the Baptist Church Danbury, Little Graces, and Great Graces group of listed buildings. The Hammonds, Phillows and Rumbolds farmsteads which are within the site (the latter farmhouse being a non-designated heritage asset) should be provided with appropriate open space and landscape buffers within the site to protect their settings	To ensure the Plan is effective

194	202		Strategic Growth Site Policy 16a	*Add new sixth bullet point under Historic and Natural Environment:* • Provide appropriate landscaping at the northern end of the site, to reinforce the setting of the Grade I listed Church of St Mary the Virgin and the Grade II listed Little Baddow Hall, and help mitigate visual impacts of new development	To ensure the Plan is effective
195	202		Strategic Growth Site Policy 16a	*Amend tenth bullet point under Historic and Natural Environment:* • The area to the east of Sandon Brook notated on the Policies Map for Future Recreation/SuDS/Biodiversity should focus on informal recreation, natural and semi natural green infrastructure uses rather than formal sports recreation requiring built development, floodlighting or significant servicing	To ensure the Plan is effective
196	202		Strategic Growth Site Policy 16a	*Amend twelfth bullet point under Historic and Natural Environment:* • Conserve and enhance biodiversity and avoid adverse effects on the River Chelmer, and Old Hare Wood local wildlife sites, Waterhall Meadows Essex Wildlife Trust Nature Reserve, and Long Spring Wood and Hall Wood ancient woodlands, and Blakes Wood & Lingwood Common SSSI, Danbury Common SSSI, and Woodham Walter Common SSSI	To ensure the Plan is effective

198	202		Strategic Growth Site Policy 16a	*Amend eighteenth bullet point under Historic and Natural Environment to read:* • Undertake an Archaeological Assessment <u>to inform a conservation/mitigation strategy to be developed for significant archaeological heritage assets</u> ~~and conserve existing archaeological features~~	To ensure the Plan is effective
199	202		Strategic Growth Site Policy 16a	*Amend twentieth bullet point under Historic and Natural Environment to read:* • Provide a minimum of 20% biodiversity net gain above the ecological baseline in accordance with Policy DM16<u>, capped at what can be practically delivered onsite</u>	To ensure the Plan is effective
200	203		Strategic Growth Site Policy 16a	*Add new fourth bullet point under Site Infrastructure Requirements:* • <u>Financial contributions to primary, secondary, early years education and childcare, including SEND education as required by the Local Education Authority</u>	To ensure the Plan is effective and to reflect the latest information
201	204		Strategic Growth Site Policy 16a	*Amend third bullet point under Stewardship:* • A Stewardship Strategy to be provided as part of the planning application process to include a) a robust governance strategy of the chosen stewardship vehicle, b) a ~~full~~ <u>Draft</u> Business Plan for the chosen stewardship vehicle and c) arrangements for maintenance, management and monitoring of public spaces and community assets.	To ensure the Plan is effective

202	205		Strategic Growth Site Policy 16a Paragraph 7.354	*Amend first sentence:* The site allocation is to be planned comprehensively in accordance with a masterplan approved by the City Council <u>prior to the determination of any planning application.</u>	To ensure the Plan is effective
203	205		Strategic Growth Site Policy 16a Paragraph 7.360	*Amend third sentence:* The development should provide a mix of type and range of sizes of Use Class E(g)(i)-(iii)<u>, B2 and/or B8</u> employment units to help Chelmsford accommodate the predicted growth in economic development and identified need for new jobs which include the business sectors identified in Policy S8.	Clarity and consistency across the Plan and to ensure the Plan is effective
NEW	203	-	Strategic Growth Site 16a	*Amend first and second bullet points under Site infrastructure requirements:* • A new secondary school (Use Class F1(a)) on 10.1 hectares co-located with primary school (Use Class F1(a)) and early years and childcare nursery (Use Class E(f)) on 2.1 hectares of suitable land allocated for education and childcare use <u>with funding proportionate to pupil yield from the Garden Community Development</u> • Two new primary schools (Use Class F1(a)) with co-located early years and childcare nursery (Use Class E(f)) each on 2.1 hectares of suitable land allocated for education and childcare use <u>with funding proportionate to pupil yield from the Garden Community Development</u>	To ensure the requirements are justified

NEW	206	-	Strategic Growth Site 16a Paragraph 7.361	*Add new second sentence:* Given that the precise requirement could flex over time, the equivalent land take for the provision of schools, early years and childcare nurseries to that defined in the policy must be provided to deliver the school places required in line with the needs identified at the time by the local authorities with responsibilities for education.	To ensure the requirements are justified
204	206		Strategic Growth Site Policy 16a Paragraph 7.362	*Add additional sentence to end of paragraph:* A safe traffic free environment around school pedestrian entrances must be provided, ensuring access for emergency vehicles only.	To ensure the Plan is effective
205	207		Strategic Growth Site Policy 16a Paragraph 7.367	*Amend paragraph:* The development will also be required to provide an appropriate Bus Based Rapid Transit. This should be a direct, frequent bus service that will connect the new development with the City Centre and Chelmsford and Beaulieu Park Rail Stations. It is critical for enabling local, frequent travel without reliance on the private car. The masterplan should demonstrate a choice of suitable ~~provide a choice of unimpeded~~ route corridors within the developed area, able to carry rapid transit bus services and enable convenient connections between residential areas, employment areas, Beaulieu Park Rail Station and Chelmsford City Centre. Essex County Council will work with the developers to determine ~~a preferred route corridor~~ routes	To ensure the Plan is effective

				through the development that prioritise buses to serve residents and key locations.	
206	207		Strategic Growth Site Policy 16a Paragraph 7.368	*Amend paragraph:* The site will provide a high quality development in a landscaped setting which works in sympathy with the local landscape and heritage assets. This should be informed by landscape and heritage evidence, including the Council's Heritage Impact Assessment for the site, the 2017 Landscape Sensitivity and Capacity Assessment and the Historic Environment Characterisation Project. A detailed Heritage Impact Assessment shall be prepared, which should inform positive placemaking and the Masterplan for the site. The development must promote the highest standards of design and provide high quality and inclusively designed buildings and public and private spaces planned around a coherent framework of routes, blocks and spaces.	To ensure the Plan is effective
207	208		Strategic Growth Site Policy 16a Paragraph 7.370	*Add new fourth sentence:* Heritage impacts shall be avoided or minimised through the masterplan strategy, informed by the detailed heritage assessment, remaining harms shall be mitigated where possible, with the remaining harm weighed up in accordance with policies DM13, DM14 and DM15. *Add new text after sixth sentence:* To reinforce the setting of the Church of St Mary the Virgin and	To ensure the Plan is effective

				Little Baddow Hall, appropriate landscaping will be required at the northern end of the site, to help mitigate visual impacts of new development. *Amend seventh sentence:* Historic lanes and Graces Walk avenue are important features in this context, which should be retained and enhanced. The Policies Map notates proposed linear landscape corridors each side of Grace's Walk and Hurrells Protected Lane (Conservation/Strategic Landscape Enhancement). Notwithstanding this notation the approved masterplan will identify the precise width of these corridors and in the case of Grace's Walk the minimum width and of the landscaped corridor should be 80m with a minimum width of 108m between buildings.	
209	208		Strategic Growth Site Policy 16a Paragraph 7.372	*Amend last sentence:* The masterplan process will establish the detailed preservation and enhancement principles for this site which shall include the provision for the recommendations within the council's heritage impact assessment.	To ensure the Plan is effective
210	208		Strategic Growth Site Policy 16a Paragraphs 7.371 and 7.372	*Swap order of paragraphs 7.371 and 7.372 so that it is clear that the requirement in current Paragraph 7.372 relates more clearly to Paragraph 7.370.*	To ensure the Plan is effective
211	209		Strategic Growth Site	*Amend sixth sentence:* Given the scale of the Garden Communities, the opportunity	To ensure the Plan is effective

			Policy 16a Paragraph 7.375	exists for these developments to achieve 20% biodiversity net gain subject to site constraints and to be capped at what can be practically delivered onsite.	
212	209		Strategic Growth Site Policy 16a Paragraph 7.376	*Amend first sentence:* The development will be required to provide appropriate habitat mitigation and creation, and appropriate buffers to avoid adverse impact on the adjacent local wildlife sites River Chelmer and Old Hare Wood, Waterhall Meadows Essex Wildlife Trust Nature Reserve, the ancient woodlands of Long Spring Wood and Hall Wood, and Blakes Wood & Lingwood Common SSSI, Danbury Common SSSI, and Woodham Walter Common SSSI, which lie within or immediately adjacent to the site.	To ensure the Plan is effective
213	209		Strategic Growth Site Policy 16a Paragraph 7.377	*Add additional sentence to end of paragraph:* The provision of this quantum of greenspace would simultaneously provide recreational mitigation for potential impacts on the Essex Coast international designations, if required as identified in paragraph 8.139 of DM16.	To ensure the Plan is effective
214	210		Strategic Growth Site Policy 16a Paragraph 7.384	*Amend paragraph:* The site ~~may~~ contains archaeological deposits which will need to be considered by future development proposals, through an archaeological evaluation. ~~Of particular interest, land to the north of Rumbolds Farm, Hammonds Road contains a significant number and configuration of crop marks requiring further investigation. Other significant archaeological~~	To ensure the Plan justified and is effective

				~~remains and their settings should also be identified and protected.~~ Therefore, a future planning application should be supported by the results of a comprehensive ~~The~~ archaeological evaluation ~~should~~ includ~~e~~ing expansion of existing ~~appropriate~~ trial trenching~~es~~. Archaeological remains identified through this process should be treated appropriately according to their level of significance and in line with Policy DM15. Once completed thi~~s e evaluation~~ will ~~in~~form part of the informative evidence base on which to define the location of development parcels and open space within the masterplan.	
216	211		Strategic Growth Site Policy 16b	*Amend first bullet point under Amount and type of development:* • Around 46,605~~43,000~~sqm (net) for a mix of employment Use Classes E(g)(i-iii), B2 and / or B8 along with other appropriate ancillary employment generating uses	To reflect approved planning application
217	211		Strategic Growth Site Policy 16b	*Include new fifth bullet point under Historic and natural environment:* • Undertake and Archaeological Assessment	To reflect approved planning application and ensure the Plan is effective
219	212		Strategic Growth Site Policy 16b	*Amend last bullet point under Site infrastructure requirements:* • Appropriate Flood Risk management infrastructure ~~Assessment~~	To ensure the Plan is effective
220 AMEND	212		Strategic Growth Site Policy 16b Paragraph 7.386	*Amend first sentence and add new second sentence:* This site allocation will provide a strategic development of around ~~43,000~~ 46,605 sqm of mixed employment floorspace in Use	For effectiveness and to update the latest position

				Classes E(g)(i-iii), B2 and / or B8. The site has outline planning permission for up to 46,605sqm of mixed employment, logistics, storage and distribution uses (use classes E(g)(iii), B2, B8) supporting associated development, infrastructure and landscaping (Ref: 24/01768/OUT). If this permission is not implemented and a new proposal comes forward, the site capacity will be considered on its individual merit.	
221	212		Strategic Growth Site Policy 16b Paragraph 7.387	*Amend paragraph:* The development of the site will be subject of a masterplan agreed with the Council prior to the determination of a detailed planning application. A conceptual masterplan has been approved as part of outline planning permission (Ref: 24/01768/OUT).	For effectiveness and to update the latest position
222	214		Strategic Growth Site Policy 16b Paragraph 7.400	*Add new fourth sentence and amend last sentence:* Open space requirements have been secured by a Section 106 agreement as part of the approved outline planning permission (Ref: 24/01768/OUT). If this permission is not implemented and a new proposal comes forward r~~R~~equirements for on-site sport, leisure and recreation facilities for employees will be informed by the latest Chelmsford Open Space, Sports and Recreational Facilities Study and Sports Facilities Strategy at the time of any new application.	For effectiveness and to update the latest position

223	214		Strategic Growth Site Policy 16b Paragraph 7.401	*Amend paragraph:* Part of the site is located within Flood Zone 2 and 3 and as such a flood risk assessment will be required and <u>the necessary flood risk management measures and</u> SuDs provided in accordance with Policy DM18.	Respond to Environment Agency PSQ25-629
224	214		Strategic Growth Site Policy 16b Paragraph 7.404	*Amend paragraph:* The site is located in the Parish of Sandon where a Neighbourhood Plan has been made (adopted). Development proposals should have regard to the Sandon Neighbourhood Plan. ~~This Parish will receive 25% of the CIL receipt for this development.~~	Factual correction as uses are zero rated from CIL

Qa	**How were sites 16a and 16b selected? What alternatives were considered?**

CCC Response to Qa

36. As set out in response to Matter 3 Q3.19 the Council has considered a number of alternative policy approaches and options including different development levels and spatial strategy options throughout the Plan's development. The process for the selection of sites in the Plan is set out in response to Matter 6, Site Selection Q.1. The selection of site 16a and 16b followed this same process.

37. When applying the combination of the SHELAA, the Spatial Principles set out in Policy S1, the IIA **(SD008)** and other technical evidence base documents discussed further in Qh below the sites performed well and have the critical mass to provide significant new infrastructure.

38. In terms of alternatives considered the Council's response to Matter 1 Q1.3 sets out the alternative options considered to deliver the Spatial Strategy and the reasons they were discounted. Further information on reasonable alternatives considered is also set out in the Submission **Spatial Strategy Topic Paper TP010 on page 17 to 20 (pdf page 18 to 21).** This sets out in table 2 on page 18 (pdf page 20) the sites which made up those reasonable alternatives. The response to this question is linked to these sites which were considered as reasonable alternatives.

39. In addition to the response to Q1.3 to Matter 1 the Integrated Impact Assessment Preferred Options (March 2024) **IIA005 Appendix G page 515 to 527 (pdf page 523**

to 535) sets out the reasons for the rejection of alternative sites. **Pdf page 533 of IIA005** refers to the site of 'Chatham Green Cluster 21SHELAA66, 21SHELAA65, 21SHELAA8'. This is the closest alternative as a new Garden Community of a similar size to site 16a. As set out in **IIA005**, 'When compared to allocated sites, including 16a. Hammonds Farm which is allocated for 3,000 dwellings, these sites have a combined capacity of 4,299 dwellings. However, the site would have a greater impact on the strategic road network than other options, and a greater cross boundary impact on the A131 to/from the Braintree district than other options. The sites are also less supported by the Plan evidence base i.e. The Landscape Sensitivity and Capacity Study 2023 which identifies the majority of the combined site area as having high landscape sensitivity. It complies less well with the Spatial Principles and Spatial Strategy due to its relative isolation from existing services and facilities which would lead to higher reliance on the use of the private car, landscape capacity and sensitivity concerns and capacity limits at the wastewater recycling facilities serving the area (Water Cycle Study 2024).'

40. In terms of reasonable alternatives for employment uses of a similar scale, **IIA005 Appendix G page 527 (pdf page 535)** refers to the alternative strategy of employment at Howe Green (Junction 17 of A12). This considers the substitution of strategic employment growth at site 16b (Land adjacent to A12 Junction 18) with land at Howe Green (around Junction 17 of the A12). The IIA notes that this option has been rejected given the 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. This location has lower landscape capacity to accommodate employment development compared with the Council's preferred option at Location 16b. This site has subsequently had an appeal dismissed for employment uses as set out in APP/W1525/W/25/3365696, noting that despite the significant benefits of the scheme, comprising the provision of units for logistics, including the various economic, environmental and other benefits, all taken together, do not clearly outweigh any harms arising, including in terms of landscape, heritage and highway matters. The Inspector therefore found that the adverse effects of the development would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

41. The selection of the two sites 16a and 16b is therefore considered to be soundly based and aligns with the Spatial Strategy.

Qb	**What is the planning status of both sites, including progress with masterplans and required infrastructure?**

CCC Response to Qb

Site 16a

42. Since submitting the Plan preparation towards the formal submission of a masterplan to the Council has been on-going in respect of site 16a. As part of that preparation

further Statements of Common Ground have been agreed with the promoters of the site, Wates Developments.

43. Statements of Common Ground **(SOCG046 and SOCG049)** with Wates Developments were submitted with the Plan and cover general site principles and infrastructure matters for site.

44. The Site Statement of Common Ground **(SGOCG046)** relates to the site allocation and notes there are no over-riding issues and constraints to bringing forward site 16a in accordance with the Chelmsford Local Plan.

45. In addition to the above Statements of Common Ground a further Masterplan Statement of Common Ground **(SOCG050)** has been agreed between the Council and Wates. This describes the work that the parties have undertaken to date to progress the Strategic Development Framework (SDF) and Strategic Masterplan for this site.

46. The SDFP is designed to culminate in the approval of the Strategic Masterplan for site 16a, and provides an opportunity, between the allocation of the site and prior to a planning application being approved, for a process of consultation, testing and feedback to occur that enables stakeholders and communities to shape emerging proposals. The Council has engaged with the site promoter on these matters with a view to enter into a Planning Performance Agreement (PPA) to progress the preparation of the Strategic Masterplan.

47. The Masterplan SOCG **(SOCG050)** sets out the progress made so far and presents an up-to-date picture of how the development will be able to satisfy the requirements of the site allocation policy.

48. As part of the site promoter's representations at the Regulation 19 consultation, a Vision and Concept Masterplan document (March 2025) and a suite of accompanying technical reports were submitted (**Rep PS25-242 refers**). Whilst these do not represent the formal Strategic Masterplan they do demonstrate an early Vision and Concept Masterplan for the site, and demonstrate a way in which the development proposed by the Site Policy 16a could be satisfactorily accommodated on the site in accordance with all relevant wider Local Plan policies. This work has been the basis for developing an emerging draft Strategic Masterplan through the SDFP.

49. **SOCG050** also sets out an indicative timetable for the SDFP which is replicated below:

Table 1. Summary of the SDFP Stages as they apply to ECGC		
Masterplan Procedure Stage	**Date**	**Description of activities and progress**
Stage 0	October 2025	This inception stage commenced the SDFP. This began the process of agreeing a draft PPA covering the SMP and planning application stages. A similar PPA arrangement is in place between the Site Promoter and ECC to secure their advisory input on county matters including highways and schools. ECC is the LEA, the LHA, the MPA, and the WPA.
Stage 1	October 2025 to August 2026	During this pre-application engagement stage, the Site Promoter, CCC, ECC and other statutory consultees participated in a focused consultation exercise involving a series of topic-based meetings/workshops over the period October 2025 to March 2026. A list of the meetings/workshops is included as Appendix 1 to this SOCG. This allowed the parties to explore and discuss various aspects of the emerging masterplan. Those discussions have helped to inform the Site Promoter's ongoing work on a draft SMP document, which will build upon the Vision and Concept Masterplan document (March 2025). The Site Promoter intends to submit the draft document later in 2026. This will complete Stage 1, which was designed to achieve as much consensus as possible between the parties ahead of wider, public consultation in Stage 2.
Stage 2	Following Examination hearings Consultation Spring 2027	In this consultation stage, the draft SMP document will be formally submitted to CCC for consultation, following which any further amendments to reach a final version will be made. Given the interface with the Local Plan process, the formal consultation and approval processes are expected to take place after the Local Plan Examination, and once the Local Plan and its accompanying Sustainability Appraisal process has progressed sufficiently to acquire certainty about the nature of the site allocation and policies influencing SGS 16a. This stage is expected to deliver a widespread consultation process with the community and stakeholders, and enable a final SMP document to be prepared. Stages 1 and 2 will ensure that all constraints and opportunities are explored in detail, within the context of all relevant policy requirements. This in turn will ensure that the final SMP document is as robust as practicable. For the avoidance of doubt, the councils will not formally agree the master planning proposals for ECGC before the completion of Stages 1 and 2.
Stage 3	Late Spring 2027	The council will complete a consultation report on Stage 2, which will accompany the final SMP document for presentation to Chelmsford Policy Board and then Cabinet for endorsement.

50. This shows progress to date and the proposed timeframe for the formal submission and consultation of a future Masterplan for site 16a.

51. The Infrastructure Statement of Common Ground **(SOCG049)** covers infrastructure need and delivery associated with the development of the full 4,500 homes, employment land and associated uses across site 16a as a whole (i.e. not just the 3,000 homes deliverable within the Local Plan Period). It demonstrates areas of agreement between the Council, ECC and Wates in relation to the scope, potential phasing and potential cost of infrastructure needed to deliver the policy requirements of the proposed allocation at site 16a.

52. Appendix 2 in **SOCG049** supplements the Council's Local Plan Infrastructure Delivery Plan **(INF012)** which did not include SGS16a. Further to submission **SOCG049** has been updated (**SOCG049A** refers). The updates reflect a further area of agreement which has been reached between parties concerning the provision of SEN as well as some corrections to the prioritisation of items in Appendix 2 to more accurately reflect the Council's position.

53. The above demonstrates that significant work is progressing with ongoing engagement with the Council during 2025 and 2026, in preparation for the Strategic Masterplan and site specific Infrastructure Delivery Plan to be submitted to the Council

for formal public consultation through the Masterplan process shortly after the Examination hearings.

Site 16b

54. Site 16b had planning permission granted at appeal on 11/12/2025 for 46,605sqm of E(g)(i-iii), B2 and / or B8 uses under 24/01768/OUT. As part of that permission a conceptual masterplan was approved and a s106 agreed, and a number of conditions were imposed to ensure the necessary improvements to the highway network are in place to support the development. These have all been agreed and are included for this site on page A-78 (pdf page 227) of the Council's Infrastructure Delivery Plan (**INF012**).

55. In reaching their conclusion on this application, the Inspector noted that the proposal, the mitigation and the modelling which supports it properly takes into account future growth in network demand and usage, the adjacent site 16a development proposals and other relevant future planned growth. They concluded that, subject to the conditions imposed by the planning permission granted for this site, the proposal is not considered to have a negative, unacceptable or otherwise harmful effect on the operation, capacity and safety of the A12 and the local road network.

Qc	**What is the basis for the site capacities and supporting development requirements set out in policies 16a and 16b?**

CCC Response to Qc

56. This response should be read in conjunction with the response to Q6.5 for this site above.

Site 16a

57. The Local Plan policy for Strategic Growth Site 16a states that 4,500 new homes will be provided on the site (3,500 within the plan period to 2041).

58. In addition to the responses to Q6.4 and 6.5 for this site, the capacity for the site has been informed by the Council's SHELAA and on-going discussions with the site promoters. Initial information submitted as part of the SHELAA for this site has been tested by the Council throughout the stages of preparation of the Plan, alongside the necessary supporting site uses and site requirements to support the number of dwellings and employment space proposed. This includes the necessary open space, SUDS, educational needs, convenience retail floorspace. This has been led by the TCPA Garden City principles.

59. Alongside this the site promoters have submitted various iterations of Masterplans, including at the Regulation 19 stage **(rep ref PS25-242 refers)**. While the masterplan and planning process will progress and inform the site further, these plans do demonstrate that the site is capable of accommodating all the site policy requirements.

Site 16b

60. As set out in response to Q6.5 for this site, while the site was allocated in Plan for 43,000sqm of mixed use employment floorspace, since the Plan **(SD001)** was drafted planning permission for this site was granted at appeal (**Appeal Ref: APP/W1525/W/25/3368272**) 46,605sqm of mixed employment, logistics, storage and distribution uses (use classes E(g)(iii), B2, B8) supporting associated development, infrastructure and landscaping. The basis for the sites capacity should now be modified to reflect this latest capacity. As such **MOD Ref 216 and Ref 220** are proposed in the **Schedule of proposed Modifications SD005 (page 58, pdf page 59).** It should be noted that **MOD Ref 220** requires a further addition to include the updated sqm as set out in **MOD Ref 220 AMEND** in the table below.

61. The site allocation will make an important contribution to meeting the need for 173,146 sqm of new employment floorspace over the plan period as set out in Strategic Policy S6 – Housing and Employment Requirements and Strategic Policy S7 - The Spatial Strategy **(SD002, page 60)**.

62. The proposed scale and type/mix of employment will meet employment floorspace needs identified in the Employment Land Review Focused Review 2024 **(ECON003)**. The mix of E(g)(iii), B2 and B8 Uses will provide flexibility to respond to future market conditions over the plan period in line with Policy S8 **(SD001, page 81)**.

63. It is the Council's position that overall, the housing capacity for site 16a and the scale and type/mix for employment uses across the two site allocations is justified and the employment floorspace across both sites will make an important contribution it will make towards meeting employment requirements over the plan period and the Plan evidence base.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
216	211		Strategic Growth Site Policy 16b	*Amend first bullet point under Amount and type of development:* • Around 46,605 ~~43,000~~ sqm (net) for a mix of employment Use Classes E(g)(i-iii), B2 and / or B8 along with other appropriate ancillary employment generating uses	For effectiveness and to update the latest position
220 AMEND	212		Strategic Growth Site Policy 16b Paragraph	Amend first sentence and add new second sentence: This site allocation will provide a strategic development of around ~~43,000~~ 46,605 sqm	For effectiveness and to update the latest position

			7.386	of mixed employment floorspace in Use Classes E(g)(i-iii), B2 and / or B8. The site has outline planning permission for up to 46,605sqm of mixed employment, logistics, storage and distribution uses (use classes E(g)(iii), B2, B8) supporting associated development, infrastructure and landscaping (Ref: 24/01768/OUT). If this permission is not implemented and a new proposal comes forward, the site capacity will be considered on its individual merit.	

Qd	**What is the basis for the requirements for two Gypsy and Traveller sites and a Travelling Showpeople site on site 16a? Is this supported by evidence?**

CCC Response to Qd

64. The requirement for the overall number of Gypsy and Traveller pitches and Travelling Showpeople plots is set out in the Gypsy and Traveller Accommodation Assessment (GTAA) in 2024 **(AH003).** The Council has included the requirement for two 10 serviced Gypsy and Traveller pitches, and one 13 plot site for Travelling Showpeople on this site as it is a suitable large strategic site to accommodate such development.

65. Alongside other strategic growth sites, the site is one of the largest strategic sites in the Plan, so it is appropriate for it to meet a proportion of the overall Gypsy and Traveller and Travelling Showpeople needs to achieve a mixed and balanced new community. This aligns with the requirements for other strategic growth sites in the Plan and has been successfully achieved in the adopted Local Plan.

66. The Submission Housing Topic Paper **(TP009)** in paragraphs 4.113 to 4.129 (page 29 to 31 (pdf page 25 to 32)) sets out the Council's position in respect of Gypsy and Traveller pitches and Travelling Showpeople and the need for pitches and plots.

67. In terms of other site options available to the Council the Council's SHELAA is open all year round so landowners can submit a new site on a rolling basis. In response to the

low number of sites submitted for Gypsy and Traveller pitches through this process relative to the level of need identified in the draft GTAA, the Council conducted a bespoke Call for Gypsy and Traveller Sites in the Autumn of 2023. All three sites submitted to this were subsequently granted planning permission as set out in **TP009**. The Council also considered whether it was feasible to expand existing public sites, but this option was dismissed on the basis that it would result in sites being larger the preferred 'around 10' site size.

68. In respect of Travelling Showpeople plots, the Council's SHELAA is also open all year round so landowners can submit a new site on a rolling basis. Similarly, this has produced little in suitable new sites coming forward. It is not possible to expand the existing Travelling Showpeople sites and the intensification of plots on existing sites has led to the overcrowding problems identified as net new need in the Chelmsford GTAA.

69. As a result of the above, being one of the largest strategic sites in the Plan, alongside multiple other strategic sites (Strategic Growth Site 2, 6, 7a, and 10) it is appropriate for it to meet a proportion of the overall Gypsy and Traveller and Travelling Showpeople needs in order to achieve a mixed and balanced new community.

70. The inclusion of the pitches and plots on this site is therefore sound.

Qe	**What would be the impact of development of sites 16a and 16b on the strategic and local highway network, including public transport and active travel? How was this assessed? What mitigation measures would be needed to support development, and how would they be funded and delivered?**

CCC Response to Qe

71. Whilst modelling for the Chelmsford Local Plan Review transport evidence base **(T006A and T007)** considers the cumulative impact of allocated development across the City of Chelmsford, the comparatively large size of Site 16a and Site 16b combined means that the Local Plan impact modelled on the local and strategic road network in the near vicinity can be largely attributed to these two sites.

72. Transport evidence base report **T006A** documents the strategic modelling appraisal of the Local Plan Review Pre-Submission with a focus on development impact at junctions along the A12 corridor, given the concentration of development to the east of Chelmsford.

73. Network capacity issues are modelled by the end of the Plan period to 2041 along the A12 between Junction 17 and 19 with background growth alone. Proposed new development along the A12 corridor has the potential to route a significant proportion of trips via the A12 - both northbound and southbound - from Junction 18, thereby exacerbating congestion along the trunk road. Modelling suggests this will also

increase the likelihood of traffic re-routing along rural roads to the east of the A12, impacting the villages of Boreham and Little Baddow.

74. At the same time, development trips from Site 16a and to a lesser extent Site 16b, will likely have a direct impact on the link capacity of the A414 east of A12 Junction 18, and this is shown in the modelling to result in the displacement of background traffic flows from the A414 and onto alternative local routes through Danbury and Sandon.

75. Site 16a East Chelmsford Garden Community is required to provide substantive sustainable and active travel improvements with the provision of multi-user access routes over and under the A12 to connect to existing routes to the west of the A12 such as Chelmer Village, and specifically linking to and enhancing the planned sustainable links being provided by the Location 3 East Chelmsford developments; Army and Navy Sustainable Transport Package improvements and outcomes from the Chelmsford Local Cycling and Walking Infrastructure Plan (LCWIP) **(T012)** into Chelmsford city centre.

76. Central to these proposals is the provision of a bus, walking and cycle-only bridge over the A12 connecting the development to the western side of the A12 to where Sandon Park and Ride, East Chelmsford site allocations, schools, leisure facilities and the city centre are located.

77. The proposed bus, walking and cycle-only bridge over the A12 is necessary to help deliver the required 60% mode shift away from the car and towards more active and sustainable modes of travel. This, in turn, would likely help reduce the impact of car trips on the surrounding road network – particularly the modelled pinch-point on the A414 on the approach to the A12 Junction 18.

78. Provision is also made for an Eastern Orbital Route serving as a bus corridor enabling access for proposed new bus services to Beaulieu Park Station.

79. Further bus priority measures along the A414 and A1114 and improved sustainable and active travel access through A12 Junction 19 - Boreham Interchange will be explored with site promoters as part of masterplanning and documented within transport assessments produced as part of the planning application process, in order to ensure that the developments will not have a severe impact on the local and strategic road network.

80. By maximising the potential for sustainable accessibility to and from Sites 16a and 16b, this will ensure a proportionate and reasonable mitigation strategy enables the development to proceed, while ensuring that severe impacts on the strategic highway network are avoided. This position is agreed with National Highways in **SOCG033-A**, page 4. Discussions with National Highways will continue during the masterplanning and transport assessment process to ensure that the mitigation measures do not have a severe impact on the strategic highway network.

81. These transport infrastructure requirements are all set out within Strategic Growth Site Policy 16a and also set out in paragraphs 7.363 - 7.367 and it is expected that they will be delivered by the developer as set out in **SOCG049A** between the Council, Essex County Council and Wates Developments Limited.

82. Site 16b has been granted planning permission with appropriate mitigation having been secured in terms of significant highway improvements to accommodate the access and impacts around Junction 18 on the A12. There has also been considerable mitigation secured for the provision of, and access to, Active Travel and Passenger Transport services at the Sandon Park and Ride facility. These will be promoted through a site-wide Travel Plan.

Qf	**To facilitate development of sites 16a and 16b, will further mitigation be required at Junction 19 of the A12, over and above that already being progressed in association with the North East Chelmsford Garden Community?**

CCC Response to Qf

83. Modelling for the Chelmsford Local Plan Review (**T006A and T007)** identifies that there are existing capacity constraints at Junction 19. As such, any Local Plan mitigation should only be proportionate to the additional impact of Local Plan growth.

84. Flow increases associated with SGC16a are predicted to be relatively low at Junction 19, with the main point of access to the Strategic Road Network being at Junction 18.

85. Widening of the A12 Southbound off slip at Junction 19 has been identified as a proposed mitigation, however, further design and modelling work is needed at the planning application stage to identify whether any additional mitigation is required in this location.

86. The above is agreed and set out in **SOCG033-A** Statement of Common Ground with National Highways and Essex County Council.

87. Additionally, the Council and Essex County Council are continuing to lobby for the delivery of Paynes Lane bridge for pedestrians, cyclists and horse riders. This scheme was originally part of the A12 DCO scheme to provide an active travel link across the A12 between Boreham and Beaulieu Park railway station. As part of the DCO cancellation announcement, the Minister of State for Transport stated that smaller scale interventions on the A12 could still be considered where they unlock growth. Further investigations are therefore currently underway looking into potential smaller scale improvements on the corridor; this is being led by National Highways and is expected to conclude by the end of the year. Essex County Council is inputting into this process supported by Chelmsford City Council. The expectation is that the developers of Site 16a give this potential mitigation due consideration as part of their

assessment, specifically in terms of a contribution towards the scheme. While not a direct policy requirement, the consideration of a contribution towards this scheme would be part of the consideration of the wider assessment and package to meet the following policy requirements under 'Movement and Access' in the site policy:

- Provide an effective movement strategy for all users within the site and beyond Provide and enhance pedestrian, cycle and where appropriate bridleway connections within the site including links to the River Chelmer Navigation and to the wider area including the Chelmer East Green Wedge, existing education locations, Chelmsford City Centre, Danbury, Little Baddow, Great Baddow and Sandon, Beaulieu Park Rail Station, and existing and proposed employment locations including SGS16b
- Measures to enable travel by active and sustainable modes that offer travel choice for people by non-car modes including a network of mobility hubs, to enable a 60% share for active and sustainable transport modes.

88. As noted in response to question e. above, Site 16b has been granted planning permission with appropriate mitigation secured. Through the Planning Application and Appeal (**Appeal Ref: APP/W1525/W/25/3368272**) process a highway-specific SOCG agreed by the developer, the Council, Essex County Council and National Highways set out that subject to the agreed mitigation (as noted in response to Qe above) the proposals would not have an unacceptable effect on the operation, capacity or safety of the strategic or local highway network.

Qg	**For site 16a, what is the basis for the requirement to enable a 60% share in active and sustainable travel? Is that realistic? What would be the implications of not achieving the 60% share?**

CCC Response to Qg

89. The Town and Country Planning Association (TCPA) publication 'The art of building a garden city: garden city standards for the 21st century, July 2014' specifies a requirement for 50% sustainable mode share with an aspiration for 60% over time.

90. A sustainable Garden Community cannot be predicated on the use of the car and placemaking is critical to achieving a 60% mode share over time. A key concept to be advanced through the comprehensive masterplan work for Site 16a is the walkable neighbourhood and the provision of mobility hubs to cluster together transportation services at key locations (Policy S16, Part B, bullet 2 and 3); by carefully positioning the three local centres and developing a strong network of new pedestrian and cycle routes within the Garden Community, residents should be able to access a range of new community services and facilities by walking and cycling, as set out in the Site Infrastructure Requirements and paragraph 7.361, including a new secondary school.

91. The development is underpinned by a modal share target of at least 60% of all trips originating within the development to be by non-car means upon completion of the scheme. The target is to be realised through a comprehensive network of inter-connected, direct and secure network of new multi user access routes (pedestrian, cycle routes and bus) within the Garden Community and which provide routes to key destinations outside of the development including the Chelmer East Green Wedge, existing education locations, Chelmsford City Centre, Danbury, Little Baddow and Sandon, City Centre and Beaulieu Park Rail Station, main road Boreham and existing and proposed employment locations. The site will provide multi-user access routes under and over the A12 to connect to existing routes including a new active and sustainable route and bridge over the A12 to connect close to Sandon Park and Ride and multi-modal vehicular bridge over the River Chelmer connecting into Junction 19 and onwards to Beaulieu Park station.

92. The development will be required to provide an appropriate Bus Based Rapid Transit providing a direct, frequent bus service via a choice of suitable route corridors within the developed area connecting with the City Centre and Chelmsford and Beaulieu Park Rail Stations to be progressed through the masterplan.

93. An integral part of achieving the modal share target is the requirement to have regard to the 2024 Essex Parking Guidance, in particular Part 2 Garden Communities and Large Scale Developments which enables lower level of parking provision in very high/high connectivity areas. This will be considered through the masterplanning process. In addition, the provision of a car club will provide a viable alternative to car ownership and can reduce the need for land devoted to car parking.

94. Site-wide travel plan(s) will incorporate strategic measures to reduce the need to travel and to demonstrate how a 60% modal share for active and sustainable transport is being achieved. There will be rigorous monitoring of the Travel Plan, including the establishment of a quarterly Transport Review Group and regular bi-monthly meetings with an onsite Residential Travel Plan Co-ordinator (RTPC) to track progress including,
    - monitor and review mode share targets, including trigger points for phases of development, as identified in the Transport Assessment and Travel Plan informed by annual traffic surveys;
    - review of the S106 to ensure annual targets have been met or to amend requirements
    - co-ordinate other activities including promotional event days to encourage the take up of active and sustainable travel modes; undertake residents surveys; monitor uptake of Residential Travel Information Packs and season tickets.

95. The developers are fully committed to the target and this forms the basis for ongoing masterplan work. However, to ensure appropriate protections, a contingency fund, known as the Monitor and Manage Fund is proposed to allow for a scenario where site wide monitoring shows that targets are not being met (**SOCG049A, REF 19, page 12).**

96. The Council's strategic modelling (**T006A)** concluded that achieving 60% sustainable mode share (alongside physical measures), will be crucial to ensure that the growth in trips associated with the proposed development is managed and will help alleviate the cross-boundary impact of development. This is realistic due to the significant opportunity presented by the site, the comprehensive package of sustainable measures proposed, and internal amenities (e.g. schools, retail etc.).

97. The requirement to enable a 60% share in active and sustainable travel is therefore considered to be sound and justified as the work with the site promoter shows that it is realistic and there is a contingency in place should it not be achieved.

Qh	**What would be the impact of development on sites 16a and 16b on the following:** • **Agricultural land, rural landscape character and heritage assets** • **Biodiversity and green infrastructure** • **Flood risk and prevention** • **Air quality, light and noise pollution** • **Other infrastructure including education, health, utilities and recreation** **How were the above impacts assessed, and what evidence is the Council relying on?**

CCC Response to Qh

Agricultural land quality

98. Strategic Growth Site 16a and 16b are currently greenfield sites, so development will result in the loss of agricultural land. In line with Strategic Policy S4, the Local Plan seeks to minimise the loss of the best and most versatile agricultural land **(SD001)** (page 61, PDF page 61)). However, to meet development needs it is inevitable that some agricultural land will be lost. The proposed allocation will make an important contribution towards meeting identified needs for housing and employment over the plan period. The allocations are also supported by the Integrated Impact Assessment which identifies significant positive effects in relation to housing, the economy, sustainable living and revitalisation, and health and well-being for site 16a **(SD008)** Appendix G (page 513, PDF page 525)) and significant positive effects in relation to the economy, and positive effects in relation to sustainable living and revitalisation for site 16b **(SD008)** Appendix G (page 514, PDF page 526)). Overall, it is considered that the loss of agricultural land to accommodate the proposed development is justified when balanced against the need for new homes and employment, and the sustainability of the sites.

99. Natural England's Agricultural Land Classification has been used to assess the quality of agricultural land in the Council area. This is set out at paragraph 2.25 and Figure 10

of the Pre-Submission Local Plan **(SD001)** (page 30-31 (PDF pages 30-31)). Most agricultural land lost as a result of new development will be Grade 3. This will lead to a loss of approximately 922 hectares of Grade 3 agricultural land and approximately 264 hectares of Grade 2 land. This equates to around 2.6% of the total Grade 2 land and around 4.5% of the total Grade 3 land in Chelmsford's administrative area (**SD002**, paragraph 3.27 (page 71).

100. As part of the Regulation 19 Consultation the site promotors of site 16a submitted a detailed Agricultural Land Classification Survey and Comparative Appraisal (Representation Ref PS25-242 refers). This demonstrates that the development of site 16a will cause the loss of 183 hectares of Best and Most Versatile agricultural land (149 hectares Grade 3b; 34 hectares of Grade 2).

Rural landscape character
16a

101. The Landscape Sensitivity and Capacity Assessment 2017 **(PL004-A)** (page 182 to 198, PDF page 204 to 220)) assesses the likely impacts of the proposed site allocation on the landscape. This concludes that the site has high overall landscape sensitivity and moderate value with a low to medium landscape capacity to accommodate development. However, as noted on page 202 to 203 (pdf page 214 to 215) of the Pre-Submission IIA (**SD008**) all of the other reasonable alternative options tested did not score any better. **SD008** notes that the significance of this at a local level will depend on the design and layout of development as well as proposed mitigation at the project level, it goes on to state that at a plan-level it is considered that a significant negative effect is not likely and there is little to differentiate between the options against this IIA objective.

102. The wider site is open in character and in order for future development not to be uncharacteristically intrusive, the site policy requires the reinstatement of historic landscape features to mitigate the visual impact of the development. This would include the historic field boundaries and structural landscaping.

16b

103. The Landscape Sensitivity and Capacity Study 2024**(PL004-E)** (page 119 to 126, PDF page 133 to 140) assesses the likely impacts of the proposed site allocation on the landscape. This concludes that the site has moderate overall landscape sensitivity and medium to high capacity to accommodate development. Guidelines are included for maintenance and strengthening of existing woodland parcel which borders the site to the west, as well as enhancing and protecting Sandon brook. Overall, it concludes that development could be mitigated without altering the intrinsic character of the landscape in this location.

Heritage assets
16a

104. Heritage assets have been assessed through a series of Heritage Impact Assessments to support all site allocations. The relevant Heritage Assessment for site 16a is the Heritage Assessment for Hammonds Farm **(PL007).** The document

identifies a range of designated and non-designated heritage assets within or in proximity to the site, which are of local and national importance, and assesses the potential impact on each asset. As a result of the assessments, it concludes with a number of principles which should be applied to the site (page 20, pdf page 21). These are reflected in the heritage requirements for the site policy.

16b

105. The relevant Heritage Assessment for site 16b is the Heritage Assessment for Employment Sites **(PL008).** Page 10 to 15 (pdf page 11 to 16) identifies a range of designated and non-designated heritage assets within or in proximity to the site, which are of local and national importance, and assesses the potential impact on each asset. As a result of the assessments, it concludes with a number of principles which should be applied to the site (page 15, pdf page 16). These are reflected in the heritage requirements for the site policy.

106. As part of the planning permission approved for the site the Inspector concluded that there is a low to very-low level of less than substantial harm to the significance of a number of designated heritage assets. Great weight should be given to the assets' conservation, but the harm identified should be weighed against the public benefits of the proposal. A similar level of harm has been found to the significance of a non-designated heritage asset, and a balanced judgment is required having regard to the scale of that harm. It was concluded that policies in the Framework that protect heritage assets do not provide a strong reason for refusing the development proposed (Appeal Ref: APP/W1525/W/25/3368272 refers).

Biodiversity and green infrastructure
16a

107. The site allocation policy requirements, in combination with wider policies in the Plan, will ensure that any negative biodiversity impacts on the nearby River Chelmer, and Old Hare Wood local wildlife sites, Waterhall Meadows Essex Wildlife Trust Nature Reserve, and Long Spring Wood and Hall Wood ancient woodlands, and Blakes Wood & Lingwood Common SSSI, Danbury Common SSSI, and Woodham Walter Common SSSI are assessed and, where appropriate, mitigated, both individually and collectively.

108. In addition, site policy requirements for the natural environment will ensure the development provides land for additional future Recreation/SuDS/Biodiversity and appropriate habitat mitigation and creation. The significant new green infrastructure, including a large new Country Park, which will be informal and natural in character will have a positive impact on biodiversity and green infrastructure when compared to the existing agricultural uses of the land.

109. The Integrated Impact Assessment identifies positive effects in relation to biodiversity for site 16a **(SD008)** Appendix G (page 513, PDF page 525)) noting the new country park as a likely significant effect. It also notes that policy includes specific requirements relating to the mitigation of potential impacts on biodiversity, including landscape buffers to the development edges and Local Wildlife sites.

110. In addition to the site policy DM16 - Protection and Promotion of Ecology, Nature and Biodiversity **(SD001)** (page 272 (PDF page 272)) will ensure the development provides a minimum 20% biodiversity net gain above the ecological baseline value of the site. Furthermore, Policy DM17 – Trees, Woodland and Landscape Features **(SD001)** (page 276 (PDF page 276)) will support biodiversity on the site by requiring the development to plant new trees as part of landscaping requirements.

111. Overall, it is considered that the site allocation policy and wider policies of the Plan will have a positive impact on biodiversity and green infrastructure in relation to this site.

16b

112. The Integrated Impact Assessment identifies unknown effects in relation to biodiversity for site 16b **(SD008)** Appendix G (page 514, PDF page 526)). However, as part of the planning permission approved for the site the Inspector concluded that the proposal would deliver a substantial biodiversity net gain (BNG). The proposal would result in a 19.59% gain in habitat biodiversity units, 163.89% in hedgerow biodiversity units and 20.02% in watercourse units. This significantly exceeds the statutory requirement. In reaching these conclusions the Inspector noted concerns that such gains are theoretical, but that they are professionally calculated, and their implementation and monitoring are secured by condition. The appeal decision also noted, it is also important to note the relatively low biodiversity of a field used for agricultural purposes (Appeal Ref: APP/W1525/W/25/3368272 refers).

Flood risk and prevention

16a

113. The site is predominantly in Flood Zone 1 (92%) with the remainder in Flood Zone 2 and Flood Zone 3. Surface water risk is limited.

114. The primary proposed site use is classified as More Vulnerable, however, and following a sequential approach to site planning and flood risk, these land uses are not proposed within Flood Zones 2 and 3 nor within areas of surface water risk. This is set out in the Level 2 Strategic Flood Risk Assessment 2024 **(CC010, Section 5 pages 29-35, pdf pages 45-52 and accompanying Site Summary Table)** and the Sequential and Exception Test 2024 **(CC012, pages 46-48, pdf pages 47-49)**. In addition, **CC021** provides an update to the Sequential and Exception Tests for allocated Strategic Growth Site 16a – East Chelmsford Garden Community (Hammonds Farm) and Strategic Growth Site 16b - Land adjacent to A12 Junction 18 Employment Area, which should be read in conjunction with **CC001** and **CC010**.

115. The proposed bridge and access road are considered Essential Infrastructure, are located within Flood Zone 3 and are at risk of surface water flooding.

116. At the planning application stage, it will be necessary to demonstrate through a site-specific flood risk assessment that the development will be safe throughout its lifetime. Furthermore, an integrated flood resilient and sustainable drainage design is put forward to steer development away from areas of fluvial and surface water risk. Safe

access and egress shall be demonstrated in both fluvial and surface water events but ensuring that flood water is not displaced nor risk increased elsewhere. Flood mitigation measures, such as compensatory storage, shall also not worsen flood risk and shall last throughout the lifetime of the development.

16b

117. The proposed allocation benefits from an outline planning permission for 46,605sqm mixed commercial and logistics development. It was granted on appeal in December 2025 under Planning Inspectorate reference APP/W1525/3368272.

118. The site is largely in Flood Zone 1 (82%) with the remaining area within Flood Zone 2 and Flood Zone 3. Part of the site is also significant risk of surface water flooding. The Level 2 Strategic Flood Risk Assessment 2024 **(CC010, Section 5 pages 29-35, pdf pages 45-52 accompanying Site Summary Table)** and the Sequential and Exception Test 2024 **(CC012, pages 49-51, pdf pages 50-52)** demonstrates that at the planning application stage, and with a site specific Flood Risk Assessment, risk can be mitigated and managed as part of sequential approach to site planning and layout design. This would ensure the development is safe throughout its lifetime and does not increase flood risk elsewhere. Furthermore, site planning should ensure development is steered away from areas identified as being at risk of surface water flooding and existing drainage features should be incorporated into the sustainable drainage design strategy.

Air quality

119. Air quality impacts were assessed though two air quality impact assessments, for the Pre-Submission Local Plan **(CC014)** and the Additional Sites Document **(CC016)**. **CC014** concludes that the impact of the Local Plan in 2041 can be considered negligible for all pollutants (page 36 (PDF page 36)); **CC016** concludes similarly that the impact of the Local Plan, including the additional sites, is considered to be negligible (page 15 (PDF page 15)). Further analysis through the Habitats Regulations Assessment (within the Pre-Submission Integrated Impact Assessment **(SD008)** also concluded that the Local Plan will have no adverse effects on European Sites considered vulnerable in terms of air quality (page 98, PDF page 1017).

Light and noise pollution

120. Noise and light pollution impacts have been assessed through the Habitats Regulations Assessment (within the Pre-Submission Integrated Impact Assessment **(SD008)**. Section 3.1 (page 16 (PDF page 936)) explains that in some matters a Local Plan can affect European sites through individual allocations or ‘in combination’ effects from cumulative impacts, known as effect pathways. Typical environmental changes including noise changes and introduction of light are included in Table 3-1. Appropriate assessments undertaken for these effect pathways demonstrate that the Local Plan will have no adverse effects on the integrity of any European sites (paragraph 9.2.2, page 97 (PDF page 1017)).

Education
16a

121. The Council has worked in collaboration with Essex County Council (ECC), the lead authority for Education, to ensure sufficient education places (including Early Years and Childcare) arising from new development are provided over the Plan period. The education assessment **(INF007)** has been carried out in accordance with ECC's Developers' Guide to Infrastructure Contributions (Revised 2024) **(INF015)** and the education requirements included within this site policy under '*Supporting onsite development'*.

16b

122. This site is an employment site so does not have a direct impact on education needs. Any impact on education is considered against the overall housing sites as set out above.

Health
16a

123. The Health Impact Assessment in appendix J of the IIA **(SD008)** pdf page 748 to 768 analyses the likely impact of the Local Plan on health matters. The results suggest that policies will help to secure development that will contribute to a range of positive effects across the topics considered in the HIA and no recommendations for changes or additions to policy are identified at this stage.

124. The potential impact of the Local Plan on health provision is assessed through the Infrastructure Delivery Plan (IDP) **(INF012)** and updated in the Post Consultation Amendments to IDP in response to MIQs **(INF012-A)**. Section 12 of **INF012** (PDF pages 114-129) explores primary and secondary healthcare, specialist and supported housing, and ambulance services. Recommendations on the infrastructure required to support growth have been translated into the infrastructure delivery schedules at Appendix A (from PDF page 207 and as updated in **INF012-A**) and incorporated into the site policy requirements.

16b

125. This site is an employment site so does not have a direct impact on health needs. Any impact on health is considered against the overall housing sites as set out above.

Utilities

126. The likely impact of the Local Plan on utilities including water supply, sewerage, provision of energy and broadband is assessed through the Infrastructure Delivery Plan (IDP) **(INF012)**. This evidence base report does not identify any utility capacity constraints that would hinder delivery of the proposed site allocations in this location.

127. With regards to water supply, Essex and Suffolk Water recommends early engagement on planning applications so that phasing of development and connections can be agreed. This is set out in the statement of common ground **(SOCG041)** (page 6, PDF page 7)).

128. In respect of sewerage, the Water Cycle Study Addendum **(CC017)** concludes that Chelmsford WRC has sufficient capacity to accommodate planned growth on these sites (Table 3-5, page 28 (PDF page 28)). In addition, no objection to the site allocations has been raised by Anglian Water **(SOCG019).**

129. In relation to energy, **INF012** reports that all primary substations in Chelmsford have a capacity of more than 5%, indicating that there are no electricity capacity issues in the area (Section 10.3, pdf page 98). There is also no network constraints identified in relation to gas supply (Section 10.2, page 96). In addition, no constraints have been raised by National Grid or UK Power Networks to these site allocations.

130. With regards to broadband, **INF012** reports that new development should be capable of receiving gigabit speed and reliable 5G mobile and broadband connectivity. This is in line with Digital Essex superfast broadband programme and as required by Strategic Policy S9 – Infrastructure Requirements (**SD001**, page 86 (PDF page 86)). Overall, the evidence base indicates that there are no utility constraints that would prevent the sites in this location from coming forward for development.

Recreation
16a

131. The potential impact of the Local Plan on recreation is assessed through the Infrastructure Delivery Plan (IDP) **(INF012)**. Section 7 of **INF012** (PDF pages 62-79) explores green infrastructure, and indoor and outdoor sports facilities. Recommendations on the infrastructure required to support growth have been translated into the infrastructure delivery schedules included in Appendix 2 of **SOCG049,** which supplements the Council's Local Plan Infrastructure Delivery Plan (**INF012**) which did not include SGS16a.

132. Further to submission **SOCG049** has been updated (**SOCG049A** refers). The updates reflect a further area of agreement which has been reached between parties concerning the provision of SEN as well as some corrections to the prioritisation of items in Appendix 2 to more accurately reflect the Council's position.

16b

133. This site is an employment site so does not have a direct impact on recreation needs. Any impact on recreation is considered against the overall housing sites as set out above.

134. In summary, the Council considers that the impact of development on sites 16a and 16b on the matters listed has been fully assessed by clear and proportionate evidence.

Qi	**Are the essential site specific requirements and mitigation measures justified, and will they, along with other policies in the plan, be effective in achieving sustainable development on the sites? Can they be viably provided?**

CCC Response to Qi

135. It is the Council's position that the cumulative effects of the site specific requirements and mitigation measures are justified, effective and soundly based, they will achieve sustainable development and can be viably provided.

16a

136. As with the North East Chelmsford Graden Community, a separate Infrastructure Delivery Plan (IDP) is being prepared for site 16a alongside a site masterplan. The current agreed position between the Council and Wates on the site specific IDP is set out in **SOCG049A.**

137. The site policy requirements and necessary mitigation, alongside the cumulative impacts of policies in the plan have been tested through the Infrastructure Delivery Plan (IDP) process and the Local Plan viability assessment (**V003**) takes account of the combined costs of these measures and site-specific requirements.

138. Whilst the cumulative impact of the policies was shown to derive a residual value that is less than the benchmark land value, it is well above the existing use value and only a little less than benchmark land value (**V003**, paragraph 9.14, page 48).

139. The strategic sites in **V003** were modelled on the basis that they are purchased as a whole site at the start of the development and that the whole project comes forward as a single phase. Further it was assumed that the Community Infrastructure Levy (CIL) due from sites was not used in connection with the development. Typically, sites such as site 16a are brought forward in multiple phases where land is bought in tranches and CIL is paid as phases come forward. Therefore, **V003** has tested a 'worst-case' scenario that is unlikely to transpire on a strategic site of the size of site 16a. It is also possible that CIL will be used to facilitate the delivery of development as set out in paragraph 2.4 of **SOCG046**.

140. For these reasons, and as set out in the Council's response to Matter 4, Question 4.10, the Council is satisfied that the combination of delivery mechanisms identified within the IDP (**INF012**), including planning obligations, Community Infrastructure Levy (CIL) receipts, external funding and direct provision where appropriate, provides a robust and flexible framework for securing the infrastructure required to support planned growth at this site.

141. The Council and the site promoter agree that there are no over–riding issues with the infrastructure identified in the site allocation for Strategic Growth Site 16a

(**SOCG049A,** page 6), alongside the other policies within the plan, that would prevent the site coming forward for development in a viable manner.

142. The Masterplan Statement of Common Ground for this site **(SOCG050**), page 11 to 15, covers some areas the site promoters are in disagreement with, or where matter have progressed, regarding site 16a policy requirements. The Council's position on these issues is set out in **SOCG050**:

- Travelling Showpeople plot delivery
- Land designations to the east on the policies map (notated as 'Land allocated for future recreation use and/or SUDS and/or Biodiversity')
- Convenience store floorspace
- Primary Healthcare and Emergency Service infrastructure
- Education requirements
- Policies map notation of proposed linear landscape corridors
- Request for additional built development parcel.

143. In addition to the position set out in **SOCG050** it should be noted that the landscape area to the east is highly sensitive so solar renewables or other alternative uses proposed by the site promoter are not considered acceptable in this area. Any such proposals would be better incorporated into buildings or less sensitive areas.

144. In terms of the notation for linear landscape corridors on the policies map for this site, it should be noted that the landscape setting is a key feature of this allocation and therefore 'substantial and extensive buffers' are required for mitigation. Changes to these areas on the policies map, or the use of alternative phrases in the policy such as 'appropriate' would not give sufficient clarity. The policy requirements have been informed by the Council's Heritage Impact Assessment for Hammonds Farm **(PL007)** and in conjunction with discussions with Historic England who support the policy requirements (Pre-Submission Representation **PSQ25-5810** and **SOCG008 page 6 to 10** refer).

145. The Council therefore considers that there are no viability issues surrounding this site, and the essential site specific requirements and mitigation measures are justified, along with other policies in the plan. Collectively they will be effective in achieving sustainable development on the site.

16b

146. Site 16b benefits from an outline planning permission for 46,605sqm mixed commercial and logistics development. It was granted on appeal in December 2025 under Planning Inspectorate reference APP/W1525/3368272 and the accompanying S106 for this site secures the necessary policy requirements and mitigation measures in a timely manner, alongside compliance with other policies in the plan. There were no viability issues surrounding this permission and, with the necessary policy

requirements and mitigation secured for the site, will achieve sustainable development on this site.

Qj	**What would be the effect of development of sites 16a and 16b on national policy requirements to ensure a long term supply of minerals?**

CCC Response to Qj

147. In respect of Site 16b, a Minerals Recourse Assessment (MRA) has been carried out and considered by the Essex County Council, as the Minerals Planning Authority. They have acknowledged that the minerals within the site are not of volume, quality or spatial distribution which would make extraction commercially viable. However, a condition is attached to the planning permission to ensure the incidental extraction of minerals during the development of the site, to ensure that those minerals that can be, are recovered and put to beneficial use.

148. In reaching their conclusion in the planning appeal for this site the Inspector noted at paragraph 34 of the appeal decision (Appeal Ref: APP/W1525/W/25/3368272 refers) that 'The proposal would not therefore have an unacceptable effect on safeguarded minerals within the site and does not then conflict with Policy S8 of the Essex Minerals Local Plan 2014. It is also consistent with national policy in the Framework which promotes an effective use of land'.

149. In terms of site 16a, Essex County Council (ECC), acting in its capacity as the Minerals and Waste Planning Authority (MWPA) reviewed a Mineral Assessment Report (2023) – desk-based study and provided a response on 12 December 2023. In principle, it was agreed that subject to further borehole investigations, the height of the water table is such that there would be no opportunities for prior mineral extraction in any of the areas where development was being proposed. However, there was an opportunity for 'the 'incidental extraction' to those parts of the site where no built development or infrastructure is planned. Further ground investigations were required to those areas where incidental extraction would potentially be feasible.

150. A revised Minerals Resource Assessment (MRA) dated July 2026 was reviewed by the MWPA and a response issued on 28th July 2026. The MWPA accepted its conclusions, which were consistent with the earlier `desk-based study', namely:
    - there would be no opportunities for prior mineral extraction in any of the areas where development is proposed.
    - opportunities were identified for incidental mineral extraction within peripheral areas where no built development or infrastructure is proposed, and an estimated total recoverable mineral resource of approximately 3.1 million tonnes was identified.

- mineral extracted from such areas would enable at least some indigenous material to be utilised on site as part of the main proposed development, thereby reducing the need for imported materials.

151. In conclusion, mineral policy matters at site 16a have been addressed to the satisfaction of the MWPA. However, an incidental mineral extraction strategy will be required to inform future masterplanning and planning applications in terms of the delivery, phasing, and landscape proposals of the site and to ensure the identified opportunities for mineral recovery are realised. As with site 16b this would ensure the site would not have an unacceptable effect on safeguarded minerals within the site and does not then conflict with Policy S8 of the Essex Minerals Local Plan 2014, and would be consistent with national policy in the Framework which promotes an effective use of land.

Qk	**Is delivery of site 16a, including the required infrastructure and mitigation, achievable within the timescales envisaged in the Plan? How will the timely provision of infrastructure be ensured?**

CCC Response to Qk

152. It is the Council's position that the infrastructure requirements and necessary mitigation measures for site 16a are achievable within the timescales set out in the Plan. This position is supported by the site promoters.

153. As with the North East Chelmsford Graden Community, a separate Infrastructure Delivery Plan (IDP) is being prepared for site 16a alongside a site masterplan. The current agreed position between the Council and Wates on the site specific IDP is set out in **SOCG049A.** This site specific IDP will be updated as the site progresses through the masterplan and planning application process for this site.

154. As set out in response to Matter 4 Q4.4, the Council considers that its own IDP **(INF012)**, when read alongside the infrastructure evidence prepared for site 16a **(SOCG049A),** provides a robust assessment of the full range of infrastructure required to support the planned growth set out in the Submission Local Plan to 2041. Whilst infrastructure requirements and delivery arrangements will continue to evolve over the plan period, the evidence base establishes an appropriate and proportionate understanding of infrastructure needs and provides a sound basis for plan-making and has been informed by relevant third party infrastructure providers.

155. Neither IDP is intended to provide a definitive or fixed schedule of infrastructure requirements throughout the plan period. Rather, it provides a proportionate assessment of infrastructure needs based on the best available information at the time of preparation and establishes a framework for ongoing monitoring and review as

infrastructure requirements evolve. This approach ensures the evidence base remains effective and responsive throughout the plan period.

156. Securing the provision of all infrastructure and mitigation will ultimately be for the planning applications and S106 agreement for the site to ensure. However, for the purposes of the local plan the evidence at this stage relating to infrastructure delivery and necessary mitigation measures is proportionate and there is no reason to doubt it cannot be achieved.

157. Throughout the life of the Plan its 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 set out in this site policy. This is covered more fully Matter 11 questions 11.3 to 11.5 which set out how the Plans Monitoring Framework will be effective and ensure the Plan delivers the necessary infrastructure for this site.

158. The delivery of site 16a, including the required infrastructure and mitigation, will therefore be achievable within the timescales envisaged in the Plan and the Monitoring Framework in the Plan will ensure the timely provision of necessary infrastructure.

QI	**Are any modifications to the policies for sites 16a and 16b needed to ensure an acceptable form of development is achieved?**

CCC Response to QI

159. It is the Council's position that in addition to those modifications required for soundness, as set out in response to Q6.8 for this site, the following modifications are also required to ensure an acceptable form of development is achieved for site 16a and 16b and to ensure consistency across the Plan.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
197	202		Strategic Growth Site Policy 16a	*Amend fourteenth bullet point under Historic and natural environment:* Provide suitable ~~SuDs and~~ flood risk management and Sustainable Drainage Systems (SuDS)	For consistency

208	208		Strategic Growth Site Policy 16a Paragraph 7.371	*Amend first sentence:* Being a large <u>area</u> ~~strategic allocation~~, the wider site includes an area of flood risk. As shown on the Policies Map, development will only be located in areas at least risk of flooding.	Clarity
215	211		Strategic Growth Site Policy 16b	*Amend policy title:* STRATEGIC GROWTH SITE <u>POLICY</u> 16b – LAND ADJACENT TO A12 JUNCTION 18 EMPLOYMENT AREA	Correction
218	211		Strategic Growth Site Policy 16b	*Amend ninth bullet point under Historic and natural environment:* Provide suitable SuDs and flood risk management <u>and Sustainable Drainage Systems (SuDS)</u>	For consistency

Location 10 - North of South Woodham Ferrers – Strategic Growth Site Policy 10	
Q6.3	What is the current planning status of the site (eg masterplans, permissions, completions)? Have there been any changes since the Plan was submitted for examination and if so, are any modifications needed?

CCC Response to Q6.3

160. The current planning status for Strategic Growth Site Policy 10 is set out below:

Site	**Relevant Masterplan**	**Relevant Planning Application/s**	**Housing numbers**	**Completions on site to date**
10	South Woodham Ferrers Masterplan approved 02/03/2021 **(PL048)**	21/01961/OUT resolution to grant planning permission 07/02/23; HOT 09/12/25 21/01961/FUL resolution to grant planning permission 07/02/23	1,020 Access, on site highways etc	0
10	South Woodham Ferrers Masterplan approved 02/03/2021 **(PL048)**	22/00311/OUT granted permission 23/02/26 26/00330/REM for approval of reserved matters validated 18/03/26	200	0

161. There have been no changes to the site's planning status since the Plan was Submitted for Examination.

Q6.4	For the housing sites, what is the basis for the proposed capacity?

CCC Response to Q6.4

162. The capacity for Strategic Growth Site Policy 10 has been informed by the approved Masterplan for South Woodham Ferrers **(PL048)**. The detailed planning applications listed above have set out the capacity for the site across two parcels.

Q6.5	**For the sites which include non-residential uses, what is the basis for the scale and type/mix of employment and other uses proposed? Is it justified?**

CCC Response to Q6.5

163. Strategic Growth Site Policy 10 includes a requirement for around 1,200sqm of business floorspace. This has been carried forward from the adopted Local Plan, with an increase of 200sqm to reflect the current planning applications.

164. The allocation policy does not specify the type/mix of employment, but this could provide space for a mix of employment uses including office, light industrial, general industrial or distribution depending on market requirements (Class E(g), B2, B8 or sui generis, as set out in Policy DM4 – Employment Areas and Rural Employment Areas **(SD001)** (page 248 (PDF page 248)).

165. The Council has worked in collaboration with Essex County Council (ECC), the lead authority for Education, to ensure sufficient education places (including Early Years and Childcare) arising from new development are provided over the Plan period. The education assessments (**INF007 and INF008**) have been carried out in accordance with ECC's Developers' Guide to Infrastructure Contributions (Revised 2024) **(INF015)** and the education requirements included within this site policy under '*Supporting onsite development'*.

166. The area of land that ECC requires for schools is based on the relevant Department for Education Building Bulletins (i.e. BB103 within the 2024 Guide). In line with its aspiration to increase educational achievement and enhance skills, ECC always seeks site areas towards the top end of the recommended range. Government also encourages 'extended schools' that include other community services and, clearly, larger sites are required if joint use of school facilities is to be considered. In order to produce a school with manageable year groups, ECC may require slightly more land than is indicated by a straightforward calculation of pupils from a development. The following figures are a guide to likely requirements for this site in terms of land and are reflected in the site policy requirements for education.

Type of Education	Size	Land Area (ha)	Reference
Primary School*	2FE (420 places) co-located with commensurate early years and childcare)	2.1 ha	Table 5
Stand-alone early years and childcare nursery	56 places	0.13 ha	Page 30 (PDF page 38)
OR			
Two stand-alone early years and childcare nurseries	2 x 56 places	0.13 ha each	Page 30 (PDF page 38)

* The Department for Education guidance document 'Securing developer contributions for education (August 2023)' states that all new primary schools are expected to be co-located with Early Years and Childcare provision, preferably of two forms of entry.

167. The decision on the form of provision of education will be agreed with ECC related to the local need at the time of development, balanced against falling numbers in the base population.

Q6.6	**Are the development requirements clear, and are any further safeguards or mitigation measures necessary to achieve an acceptable form of development?**

CCC Response to Q6.6

168. It is the Council's position that the development requirements for Strategic Growth Site Policy 10 are clear and consistent with the approach across the Local Plan. The requirements for each site are clearly set out in the main body of the policy, with supporting Reasoned Justification text to further expand on any further guidance on how these requirements should be met.

169. The Local Plan should be read as a whole and other policies assist in the detail of how some of these development requirements should be considered. For example, all site policies note that the infrastructure required within the site policy is in addition to the relevant requirements of **SD001** at Strategic Policy S9 – Infrastructure Requirements (page 86 (PDF page 86)), and that financial contributions will be sought in accordance with Strategic Policy S10 – Securing Infrastructure and Impact Mitigation (page 93 (PDF page 93)).

170. No further safeguards or mitigation measures are considered to be necessary for this site.

Q6.7	**What is the expected timescale and rate of development for the housing sites and is this realistic?**

CCC Response to Q6.7

171. The expected timescale and rate of development for the sites is set out in the April 2026 Five Year Housing Site Schedule **(LDS012),** which covers the entire Plan period. Strategic Growth Site 10 is expected to be delivered from 2028 onwards.

172. The Five Year Housing Land Supply Methodology (April 2026) **(LDS011)** sets out sets out how the Council calculates its five-year housing land supply, but paragraphs 4.1 to 4.15 (page 3-5 of the pdf) set out the combination of methods used by the Council to determine the annual Housing Site Schedule, namely:
    - Regular site visits
    - Information received by Development Managements Planning Officers
    - Building Control weekly reports
    - CIL commencement monthly reports
    - Annual confirmation of delivery rates with developers
    - Monitoring completed developments.

173. Strategic Growth Site Policy 10 is an allocated site in the adopted Local Plan that has been the subject of extensive discussions and negotiations. The Council's own monitoring information shows short timescales for determining REM applications on large phased development sites. The delivery programme was agreed with the developer's agent in March 2026.

174. The Council proposes the following modifications to the Reasoned Justification for Strategic Growth Site Policy 10 to ensure the policy is up to date.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
48	217		Paragraph 7.405	*Amend third sentence:* This number is reflected in the 5 year Housing Sites Schedule April 2024<u>6</u>. *Amend fifth sentence:* Development is expected to be delivered between 202~~6~~<u>8</u> and 203~~5~~<u>7</u>.	To reflect the latest housing site schedule

Q6.8	**Are any modifications to the site policy needed for soundness?**

CCC Response to Q6.8

175. It is the Council's position that no modifications are need to the policy for soundness. One proposed additional modification to the site is set out in **(SD005)** Schedule of Proposed Modifications but this does not go to matters of soundness.

Qm	**What is the likely impact of the proposed allocation on the following factors:** • **The strategic and local highway network, including public transport and active travel** • **Agricultural land quality, landscape character and heritage assets** • **Biodiversity and green infrastructure, including European sites** • **Flood risk, air quality, noise and light pollution** • **Other infrastructure, including education, health, recreation and utilities** **How were the above impacts assessed, and what evidence is the Council relying on?**

CCC Response to Qm

Strategic and local highway network

176. ECC, as the Highway Authority, undertook early pre-application discussion with the developers to agree the scope of a Transport Assessment (TA) for the applicant to understand the transportation requirements and strategy for the local area (**INF015, page 48**).

177. Site 10 has been granted planning permission with appropriate mitigation having been secured in terms of significant highway improvements to accommodate the access and impacts on the adjacent and surrounding highway network. There has also been considerable mitigation secured to provide suitable Active Travel facilities and improvements to Passenger Transport services for the site. These will be promoted through the use of the secured Travel Plan.

178. The IDP **(INF012)** identifies necessary highway mitigation on pages A-63 and 64 (pdf page 213 – 214).

Agricultural land quality

179. Strategic Growth Site 10 is currently a greenfield site, so development will result in the loss of agricultural land. The Local Plan seeks to minimise the loss of the best and most versatile agricultural land. However, to meet development needs it is inevitable that some agricultural land will be lost. The proposed allocation will make an important contribution towards meeting identified needs for housing over the plan period. The allocation is also supported by the Pre-Submission Integrated Impact Assessment which identifies significant positive effects in relation to housing **(SD008)** Appendix G (page 515, PDF page 527)). Overall, it is considered that the loss of agricultural land to accommodate the proposed development is justified when balanced against the need for new homes and the sustainability benefits of the site.

180. Natural England's Agricultural Land Classification has been used to assess the quality of agricultural land in the Council area. This is set out at paragraph 2.25 and Figure 10 of the Pre-Submission Local Plan **(SD001)** (page 30-31 (PDF pages 30-31)). Most agricultural land lost as a result of new development will be Grade 3. This will lead to a loss of approximately 922 hectares of Grade 3 agricultural land and approximately 264 hectares of Grade 2 land. This equates to around 2.6% of the total Grade 2 land and around 4.5% of the total Grade 3 land in Chelmsford's administrative area (**SD002**, paragraph 3.27 (page 71)).

Landscape character

181. The Landscape Sensitivity and Capacity Assessment for Adopted Local Plan Sites **(PL004-A)** (Section 15, page 252 (PDF page 274)) and Annex on Land at South Woodham Ferrers **(PL004-C)** (page 42, PDF page 54)) assess the likely impacts of the proposed site allocation on the landscape. The assessment is conducted across a number of parcels. The parcels relevant to the allocation are part of SWFLP1, SWFLP2, SWFLP4, and all of SWFLP3, SWFLP7, and SWFLP8. These show a range of landscape sensitivity, landscape value, and landscape capacity to accommodate development. The conclusions were used to help shape the allocation in the adopted Local Plan, and to form appropriate mitigation through requirements in the site allocation policy and wider policies of the Plan.

Heritage assets

182. Heritage assets have been assessed through a series of Heritage Impact Assessments to support all site allocations. The relevant Heritage Assessment was produced in 2017 (Heritage Assessments Technical Note **(PL051 (EB108A)** to inform production of the now adopted Local Plan. The principles for heritage assets and their settings are set out on page 90 (PDF page 92), and were used to inform the heritage requirements for the site policy.

Biodiversity and green infrastructure, including European sites

183. The site allocation policy in combination with wider policies in the Plan will ensure that any negative biodiversity impacts on the nearby Crouch and Roach Estuary SPA and Ramsar site are assessed and, where appropriate, mitigated. In addition, site policy requirements for the natural environment will ensure the development provides a landscape buffer on site boundaries and retains existing natural landscaping and trees. DM16 - Protection and Promotion of Ecology, Nature and Biodiversity **(SD001)** (page 272 (PDF page 272)) will ensure the development provides a minimum 10% biodiversity net gain above the ecological baseline value of the site. Furthermore, Policy DM17 – Trees, Woodland and Landscape Features **(SD001)** (page 276 (PDF page 276)) will support biodiversity on the site by requiring the development to plant new trees as part of landscaping requirements. Overall, it is considered that the site allocation policy and wider policies of the Plan will increase the biodiversity of the site. This is also supported by the Pre-Submission Integrated Impact Assessment **(SD008)**. Although this identifies negative effects from the site allocation in relation to biodiversity given its proximity to the Crouch and Roach Estuary SPA and Ramsar site, it concludes that the mitigation measures provided in the site policy are appropriate (Appendix G, page 515 (PDF page 527)).

Flood risk

184. This is an existing site allocation in the Adopted Chelmsford Local Plan **(OSP015)** which is not yet built and is carried forward in the Pre-Submission (Regulation 19) Document **(SD001, page 214, pdf page 214)**. Approved masterplans are in place (20/00001/MAS & 20/00002/MAS) together with outline planning permission (22/00331/OUT).

185. The Council is relying upon evidence from the adopted Chelmsford Local Plan which demonstrates that the development can be delivered using a sequential approach to flood risk, that it can be done safely, now and into the future, and that it would not make flood risk worse elsewhere. Evidence is provided by Level 1 and Level 2 Strategic Flood Risk Assessment 2018 **(CC029, Table 12-1 page 72, pdf page 72)** and Sequential and Exception Test Completed 2017 **(CC011, pdf pages 112-115**).

186. The allocation was reviewed as part of the Level 2 Strategic Flood Risk Assessment 2024 (CC010, Chapter 5, pages 29-35, pdf pages 45-52) and it was concluded that no further work was needed. The approach to site screening is set out at paragraphs 5.2 and 5.3 of the Level 2 Strategic Flood Risk Assessment 2024 **(CC010, pages 30-34, pdf pages 46-51)**.

187. Development is progressing since the adoption of the Local Plan as evidenced by the approved masterplans and governing outline permission. These permissions demonstrate that flood risk control and mitigation can be achieved through site layout planning to ensure that more vulnerable land uses, such as residential, are located towards lowest risk, and that the development is sustainable and safe.

Air quality

188. Air quality impacts were assessed though two air quality impact assessments, for the Pre-Submission Local Plan **(CC014)** and the Additional Sites Document **(CC016)**. **CC014** concludes that the impact of the Local Plan in 2041 can be considered negligible for all pollutants (page 36 (PDF page 36)); **CC016** concludes similarly that the impact of the Local Plan, including the additional sites, is considered to be negligible (page 15 (PDF page 15)). Further analysis through the Habitats Regulations Assessment (within the Pre-Submission Integrated Impact Assessment **(SD008)** also concluded that the Local Plan will have no adverse effects on European Sites considered vulnerable in terms of air quality (page 98, PDF page 1017).

189. Noise and light pollution impacts have been assessed through the Habitats Regulations Assessment (within the Pre-Submission Integrated Impact Assessment **(SD008)**). This site is near the Crouch and Roach Estuaries Special Protection Area, Ramsar site and Site of Special Scientific Interest which lie to the south of the town. Section 3.1 explains that in some matters a Local Plan can affect European sites through individual allocations or 'in combination' effects from cumulative impacts, known as effect pathways. Typical environmental changes including noise changes and introduction of light are included in Table 3-1 (page 16 (PDF page 936)). Appropriate assessments undertaken for these effect pathways demonstrate that the Local Plan will have no adverse effects on the integrity of any European sites.

Education

190. The Council has worked in collaboration with Essex County Council (ECC), the lead authority for Education, to ensure sufficient education places (including Early Years and Childcare) arising from new development are provided over the Plan period. The education assessment **(INF007)** has been carried out in accordance with ECC's Developers' Guide to Infrastructure Contributions (Revised 2024) **(INF015)** and the education requirements included within this site policy under '*Supporting onsite development'*.

Health

191. The potential impact of the Local Plan on health provision is assessed through the Infrastructure Delivery Plan (IDP) **(INF012)** and updated in the Post Consultation Amendments to IDP in response to MIQs **(INF012-A)**. Section 12 of **INF012** (PDF pages 114-129) explores primary and secondary healthcare, specialist and supported housing, and ambulance services. Recommendations on the infrastructure required to support growth have been translated into the infrastructure delivery schedules at Appendix A (from PDF page 207 and as updated in **INF012-A**) and incorporated into the site policy requirements.

Recreation

192. The potential impact of the Local Plan on recreation is assessed through the Infrastructure Delivery Plan (IDP) **(INF012)**. Section 7 of **INF012** (PDF pages 62-79) explores green infrastructure, and indoor and outdoor sports facilities. Recommendations on the infrastructure required to support growth have been translated into the infrastructure delivery schedules at Appendix A (from PDF page 150), and incorporated into the site policy requirements.

Utilities

193. The likely impact of the Local Plan on utilities including water supply, sewerage, provision of energy and broadband is assessed through the Infrastructure Delivery Plan (IDP) **(INF012)**. This evidence base report does not identify any utility capacity constraints that would hinder delivery of the proposed site allocation.

194. With regards to water supply, Essex and Suffolk Water recommends early engagement on planning applications so that phasing of development and connections can be agreed. This is set out in the statement of common ground **(SOCG041)** (page 6, PDF page 7)).

195. In respect to sewerage, as an allocated site being brought forward there is sufficient capacity to accommodate planned growth on this site. In addition, no objection to the site allocation has been raised by Anglian Water **(SOCG019).**

196. In relation to energy, **INF012** reports that all primary substations in Chelmsford have a capacity of more than 5%, indicating that there are no electricity capacity issues in the area (Section 10.3, page 98). There is also no network constraints identified in relation to gas supply (Section 10.2, page 96). In addition, no constraints have been raised by National Grid or UK Power Networks to the site allocation.

197. With regards to broadband, **INF012** reports that new development should be capable of receiving gigabit speed and reliable 5G mobile and broadband connectivity. This is in line with Digital Essex superfast broadband programme and as required by Strategic Policy S9 – Infrastructure Requirements (SD001, page 86 (PDF page 86)). Overall, the evidence base indicates that there are no utility constraints that would prevent the site coming forward for development.

Qn	**Are the essential site specific requirements and mitigation measures justified, and will they, along with other policies in the plan, be effective in achieving sustainable development on the site?**

CCC Response to Qn

198. It is the Council's position that the development requirements for both sites are justified. The requirements for each site are clearly set out in the main body of the policy, with supporting Reasoned Justification text to further expand on any further guidance on how these requirements should be met.

199. The Local Plan should be read as a whole and along with the other policies in the Local Plan the site requirements and mitigation measures will be effective in achieving sustainable development. The Local Plan is considered an appropriate strategy for meeting identified needs in a sustainable way.

Location 11 - Growth Site Policy 11b and Strategic Growth Site Policy 11c	
Q6.3	**What is the current planning status of the site (eg masterplans, permissions, completions)? Have there been any changes since the Plan was submitted for examination and if so, are any modifications needed?**

CCC Response to Q6.3

200. This location comprises two sites, Growth Site Policy 11b and Strategic Growth Site 11c. The current planning status for each site is set out below:

Site	**Relevant Masterplan**	**Relevant Planning Application/s**	**Housing numbers**	**Completions on site to date**
11b	None	Pre-application stage	20	0
11c	None	25/01158/OUT resolution to grant planning permission 15/09/26	250	0

201. Site 11c's planning status has changed since the Local Plan was Submitted for Examination, through the resolution to grant planning permission on 15/09/26. No modification is needed to the policy at this time.

Q6.4	**For the housing sites, what is the basis for the proposed capacity?**

CCC Response to Q6.4

202. The capacity for Growth Site Policy 11b has been informed by a site appraisal conducted internally.

203. The capacity for Strategic Growth Site Policy 11c has been informed by design work conducted internally and early discussions with the site promoters. This is demonstrated in the Additional Housing Site Studies **(PL018)** (PDF page 8) which shows how the housing sites could be developed to suitably achieve the proposed number of homes and supporting on-site land-uses such as new community facilities, open space and sustainable drainage systems (SUDS). They also demonstrate how site access could be suitably achieved. The detailed planning application listed above sets out the capacity for the site.

Q6.5	**For the sites which include non-residential uses, what is the basis for the scale and type/mix of employment and other uses proposed? Is it justified?**

CCC Response to Q6.5

204. Growth Site Policy 11b does not include non-residential uses.

205. Strategic Growth Site Policy 11c includes a requirement for a 56 place stand-alone early years and childcare nursery, and a community facility.

206. The Council has worked in collaboration with Essex County Council (ECC), the lead authority for Education, to ensure sufficient education places (including Early Years and Childcare) arising from new development are provided over the Plan period. The education assessment **(INF007)** has been carried out in accordance with ECC's Developers' Guide to Infrastructure Contributions (Revised 2024) **(INF015)** and the education requirements included within this site policy under '*Supporting onsite development'*.

207. The combined need from development in Bicknacre and East Hanningfield is around 50 places, requiring a new nursery to cover this demand (**INF007**, PDF page 6). ECC has stated a preference for this facility to be located at Site 11c in Bicknacre, as a larger settlement. The developer will be required to provide the land and a proportionate contribution with the other sites in East Hanningfield/Bicknacre being required to make a proportionate contribution.

208. The area of land that ECC requires for schools is based on the relevant Department for Education Building Bulletins (i.e. BB103 within the 2024 Guide). In line with its aspiration to increase educational achievement and enhance skills, ECC always seeks site areas towards the top end of the recommended range. Government also encourages 'extended schools' that include other community services and, clearly, larger sites are required if joint use of school facilities is to be considered. In order to produce a school with manageable year groups, ECC may require slightly more land than is indicated by a straightforward calculation of pupils from a development. The following figures are a guide to likely requirements for this site in terms of land and are reflected in the site policy requirements for education.

Type of Education	**Size**	**Land Area (ha)**	**Reference**
Stand-alone early years and childcare nursery	56 places	0.13 ha	Page 30 (PDF page 38)

* The Department for Education guidance document 'Securing developer contributions for education (August 2023)' states that all new primary schools are expected to be co-located with Early Years and Childcare provision, preferably of two forms of entry.

209. The developer will be required to provide land for a community facility. The scale and end use of a community facility is flexible, depending on demand.

Q6.6	**Are the development requirements clear, and are any further safeguards or mitigation measures necessary to achieve an acceptable form of development?**

CCC Response to Q6.6

210. It is the Council's position that the development requirements for Growth Site Policy 11b and Strategic Growth Site Policy 11c are clear and consistent with the approach across the Local Plan. The requirements for each site are clearly set out in the main body of the policy, with supporting Reasoned Justification text to further expand on any further guidance on how these requirements should be met.

211. The Local Plan should be read as a whole and other policies assist in the detail of how some of these development requirements should be considered. For example, all site policies note that the infrastructure required within the site policy is in addition to the relevant requirements of **SD001** at Strategic Policy S9 – Infrastructure Requirements (page 86 (PDF page 86)), and that financial contributions will be sought in accordance with Strategic Policy S10 – Securing Infrastructure and Impact Mitigation (page 93 (PDF page 93)).

212. In relation to further safeguards, the Council proposes the following modifications to the policy and reasoned justification for Growth Site Policy 11b and Strategic Growth Site Policy 11c to ensure the policy is effective.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
228	220		Growth Site Policy 11b	*Add additional bullet point under Design and layout:* • Ensure there is no impact on the operational or capability of safeguarded defence assets.	To ensure the policy is effective
230	221		Growth Site Policy 11b Paragraph 7.430	*Insert new paragraph after 7.430:* The site lies within the Eastern 2 WAM (Wide Area Multilateration) Network safeguarding zone where a MOD statutory consultation is required as part of any planning application.	To ensure the policy is effective

				Technical assets that facilitate air traffic management, primarily radar, navigation, and communications systems are safeguarded to limit the impact of development on their capability and operation. The height, massing and materials used to finish a development may all be factors in assessing the impact of a given scheme. The development should be designed to ensure that it has no impact on the operation or capability of defence sites or assets	
231		41	Strategic Growth Site Policy 11c	*Add new bullet point under Design and Layout:* • Layout shaped by utility easements	To ensure the policy is effective
235		41	Strategic Growth Site Policy 11c	*Add new paragraph after paragraph 2.125:* There is a surface water sewer within the site boundary. Layout should safeguard suitable access for the maintenance of sewerage infrastructure.	To ensure the policy is effective

Q6.7	**What is the expected timescale and rate of development for the housing sites and is this realistic?**

CCC Response to Q6.7

213. The expected timescale and rate of development for the sites is set out in the April 2026 Five Year Housing Site Schedule **(LDS012),** which covers the entire Plan period. Growth Site 11b is expected to be delivered from 2028 onwards. Strategic Growth Site 11c is expected to be delivered from 2027 onwards.

214. The Five Year Housing Land Supply Methodology (April 2026) **(LDS011)** sets out sets out how the Council calculates its five-year housing land supply, but paragraphs 4.1 to 4.15 (page 3-5 of the pdf) set out the combination of methods used by the Council to determine the annual Housing Site Schedule, namely:
    - Regular site visits

- Information received by Development Managements Planning Officers
- Building Control weekly reports
- CIL commencement monthly reports
- Annual confirmation of delivery rates with developers
- Monitoring completed developments.

215. The delivery timeframe for Strategic Growth Site 11c, as set out in the Housing Site Schedule, has been agreed with the site promoter as part of a statement of common ground **(SOCG043)**.

216. The Council proposes the following modifications to the Reasoned Justification for Growth Site Policy 11b to reflect the April 2026 Five Year Housing Site Schedule.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
229	221		Growth Site Policy 11b Paragraph 7.428	*Amend first and second sentences:* Land at Kingsgate, Bicknacre Road within and partially adjacent to the Defined Settlement of Bicknacre. Development is expected to be delivered from 2023~~08~~/20~~3~~29 onwards.	To reflect the latest housing site schedule

Q6.8	Are any modifications to the site policy needed for soundness?

CCC Response to Q6.8

217. It is the Council's position that with the proposed modifications listed in the table below and set out in **(SD005)** Schedule of Proposed Modifications, in addition to the modifications at Q 6.6 and Q6.7, the site policies for Growth Site 11b and Strategic Growth Site 11c are sound. Other proposed additional modifications to the site are set out in **SD005** but these do not go to matters of soundness.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason

231	221		Growth Site Policy 11b Paragraph 7.432	*Add new sentence to end of paragraph:* Developers will work closely with relevant local stakeholders, such as Natural England and the SSSI site managers (National Trust and Essex Wildlife Trust) to assess recreational pressure and provide the necessary mitigation measures for SSSIs.	To ensure the policy is effective
234		43	Growth Site Policy 11c Paragraph 2.125	*Add new sentence to end of paragraph:* Developers will work closely with relevant local stakeholders, such as Natural England and the SSSI site managers (National Trust and Essex Wildlife Trust) to assess recreational pressure and provide the necessary mitigation measures for SSSIs.	To ensure the policy is effective

Qo	**What is the likely impact of the proposed allocation on the following factors:** • **The strategic and local highway network, including public transport and active travel** • **Agricultural land quality, landscape character, biodiversity and heritage assets** • **Flood risk, air quality, noise and light pollution** • **Other infrastructure, including education, health, recreation and utilities** **How were the above impacts assessed, and what evidence is the Council relying on?**

CCC Response to Qo

Strategic and local highway network

218. Transport evidence base modelling **(T006A and T007)** undertaken for the latter stages of Plan development considers the cumulative impact of development and mitigation on the strategic road network across the City of Chelmsford. This is aligned with guidance on 'Transport evidence bases in plan making and decision taking', published by MHCLG. (https://www.gov.uk/guidance/transport-evidence-bases-in-plan-making-and-decision-taking)

219. An appraisal of the highway impact of Local Plan Review additional sites to the south of Chelmsford is documented in evidence base report **T007**. The 'Summary of Findings and Conclusions' on page 40 suggests that the addition of trips from these sites to the road network will lead to the displacement of background traffic flows, potentially causing a small quantum of ‘rat-running’ through West Hanningfield, but resulting in little overall change to the forecast modelled capacity of A12 Junction 17 at Howe Green.

220. Whilst the transport evidence base does not assess the specific impact of the proposed allocation or identify site-specific mitigation for smaller sites, the quantum of trip generation at SGS11b&c is expected to have a low impact on the road network at a strategic level. The local road network will be expected to be assessed in more detail by site promoters as part of a planning application. Measures to mitigate highway impact at a local level will then need to be agreed with ECC as the highway authority (and National Highways, where relevant).

Agricultural land quality

221. Growth Site 11b and Strategic Growth Site 11c are currently greenfield sites, so development will result in the loss of agricultural land. In line with Strategic Policy S4, the Local Plan seeks to minimise the loss of the best and most versatile agricultural land **(SD001)** (page 61, PDF page 61)). However, to meet development needs it is inevitable that some agricultural land will be lost. The proposed allocation will make an important contribution towards meeting identified needs for housing over the plan period. The allocation is also supported by the Additional Sites Integrated Impact Assessment which identifies significant positive effects in relation to housing **(SD009)** Appendix C (page 9, PDF page 75)). Overall, it is considered that the loss of agricultural land to accommodate the proposed development is justified when balanced against the need for new homes and the sustainability benefits of the site.

222. Natural England’s Agricultural Land Classification has been used to assess the quality of agricultural land in the Council area. This is set out at paragraph 2.25 and Figure 10 of the Pre-Submission Local Plan **(SD001)** (page 30-31 (PDF pages 30-31)). Most agricultural land lost as a result of new development will be Grade 3. This will lead to a loss of approximately 922 hectares of Grade 3 agricultural land and approximately 264 hectares of Grade 2 land. This equates to around 2.6% of the total Grade 2 land and

around 4.5% of the total Grade 3 land in Chelmsford's administrative area (**SD002**, paragraph 3.27 (page 71)).

Landscape character

223. The Additional Sites - Landscape Sensitivity and Capacity Study October 2025 **(PL013)** (page 42, PDF page 54)) assesses the likely impacts of the proposed site allocation on the landscape. This concludes that the site has moderate overall landscape sensitivity, moderate landscape value, and medium landscape capacity to accommodate development. Guidelines are included for maintenance/strengthening of existing hedgerows, and the built edge of development. Overall, it is considered that these impacts that can be appropriately mitigated through requirements in the site allocation policy and wider policies of the Plan.

Heritage assets

224. Heritage assets have been assessed through a series of Heritage Impact Assessments to support all site allocations. The relevant Heritage Assessment is the Additional Sites Heritage Assessments **(PL014)** (Section 5.0, PDF page 10), which identifies a collection of non-designated heritage assets on Moor Hall Lane. The principles for heritage assets and their settings are set out on PDF page 12 and were used to inform the heritage requirements for the site policy.

Biodiversity and green infrastructure, including European sites

225. The site allocation policy in combination with wider policies in the Plan will ensure that any negative biodiversity impacts on the nearby Thrift Wood SSSI are assessed and, where appropriate, mitigated. In addition, site policy requirements for the natural environment will ensure the development provides a landscape buffer on site boundaries and retains existing natural landscaping and trees. DM16 - Protection and Promotion of Ecology, Nature and Biodiversity **(SD001)** (page 272 (PDF page 272)) will ensure the development provides a minimum 10% biodiversity net gain above the ecological baseline value of the site. Furthermore, Policy DM17 – Trees, Woodland and Landscape Features **(SD001)** (page 276 (PDF page 276)) will support biodiversity on the site by requiring the development to plant new trees as part of landscaping requirements. Overall, it is considered that the site allocation policy and wider policies of the Plan will increase the biodiversity of the site. This is also supported by the Additional Sites Integrated Impact Assessment **(SD009)**. Although this identifies negative effects from the site allocation in relation to biodiversity given its proximity to the Thrift Wood SSSI, it concludes that the mitigation measures provided in the site policy are appropriate Appendix C (page 9 (PDF page 75)).

Flood risk

226. Growth Site 11b was not subject to a Level 2 Strategic Flood Risk Assessment site study. This is because it is in Flood Zone 1 and the assessment identifies it as at very low risk of flooding from all sources. At one hectare, a site specific flood risk

assessment will be needed at the planning application stage (NPPF Footnote 59 page 49). Site planning should ensure that the development would follow the sequential approach, demonstrate sustainable drainage principles and systems, remain safe now and into the future and not worsen flood risk elsewhere, NPPF paragraph 173. The approach to site screening is set out at paragraphs 5.2 and 5.3 of the Level 2 Strategic Flood Risk Assessment 2024 (**CC010**, pages 30-34 (pdf pages 46-51)).

227. Strategic Growth Site 11c is in Flood Zone 1. A section of the site is at significant risk of surface water flooding. This is set out in the Additional Sites Sequential and Exception Test 2025 document (**CC019,** pages 19-20 (pdf pages 21-22)). The proposed allocation has a resolution to grant outline planning permission subject to the completion of a Section 106 legal agreement (CCC planning ref: 25/01158/OUT).

228. The control, mitigation and management of flood risk would be achieved through site and layout planning to ensure that more vulnerable residential land uses are located towards lowest risk and in this instance away from surface water flooding. This is demonstrated by the Additional Sites Sequential and Exception Test 2025 for this site (**CC019**, pages 19-20 (pdf pages 21-22)) and the recent resolution to grant outline planning permission.

Air quality

229. Air quality impacts were assessed though two air quality impact assessments, for the Pre-Submission Local Plan **(CC014)** and the Additional Sites Document **(CC016)**. **CC014** concludes that the impact of the Local Plan in 2041 can be considered negligible for all pollutants (page 36 (PDF page 36)); **CC016** concludes similarly that the impact of the Local Plan, including the additional sites, is considered to be negligible (page 15 (PDF page 15)). Further analysis through the Habitats Regulations Assessment (within the Pre-Submission Integrated Impact Assessment **(SD008)** also concluded that the Local Plan will have no adverse effects on European Sites considered vulnerable in terms of air quality (page 98, PDF page 1017). The Additional Sites IIA Addendum **(SD009)** confirms that the additional allocations do not change that conclusion (paragraph 3.29, page 9 (PDF page 127)).

Noise and light pollution

230. Noise and light pollution impacts have been assessed through the Habitats Regulations Assessment (within the Pre-Submission Integrated Impact Assessment **(SD008)**). Section 3.1 (page 16 (PDF page 936)) explains that in some matters a Local Plan can affect European sites through individual allocations or 'in combination' effects from cumulative impacts, known as effect pathways. Typical environmental changes including noise changes and introduction of light are included in Table 3-1. Appropriate assessments undertaken for these effect pathways demonstrate that the Local Plan will have no adverse effects on the integrity of any European sites (paragraph 9.2.2., page 97 (PDF page 1017)).

Education

231. The Council has worked in collaboration with Essex County Council (ECC), the lead authority for Education, to ensure sufficient education places (including Early Years and Childcare) arising from new development are provided over the Plan period. The education assessment **(INF007)** has been carried out in accordance with ECC's Developers' Guide to Infrastructure Contributions (Revised 2024) **(INF015)** and the education requirements included within this site policy under '*Supporting onsite development'*.

Health

232. The potential impact of the Local Plan on health provision is assessed through the Infrastructure Delivery Plan (IDP) **(INF012)** and updated in the Post Consultation Amendments to IDP in response to MIQs **(INF012-A)**. Section 12 of **INF012** (PDF pages 114-129) explores primary and secondary healthcare, specialist and supported housing, and ambulance services. Recommendations on the infrastructure required to support growth have been translated into the infrastructure delivery schedules at Appendix A (from PDF page 207 and as updated in **INF012-A**) and incorporated into the site policy requirements.

Recreation

233. The potential impact of the Local Plan on recreation is assessed through the Infrastructure Delivery Plan (IDP) **(INF012)**. Section 7 of **INF012** (PDF pages 62-79) explores green infrastructure, and indoor and outdoor sports facilities. Recommendations on the infrastructure required to support growth have been translated into the infrastructure delivery schedules at Appendix A (from PDF page 150) and incorporated into the site policy requirements.

Utilities

234. The likely impact of the Local Plan on utilities including water supply, sewerage, provision of energy and broadband is assessed through the Infrastructure Delivery Plan (IDP) **(INF012)**. This evidence base report does not identify any utility capacity constraints that would hinder delivery of the proposed site allocation.

235. With regards to water supply, Essex and Suffolk Water recommends early engagement on planning applications so that phasing of development and connections can be agreed. This is set out in the statement of common ground **(SOCG041)** (page 6, PDF page 7)).

236. In respect of sewerage, the Water Cycle Study Addendum **(CC017)** concludes that Chelmsford WRC has sufficient capacity to accommodate planned growth on this site (Table 3-5, page 28 (PDF page 28)). In addition, no objection to the site allocation has been raised by Anglian Water **(SOCG019)**.

237. In relation to energy, **INF012** reports that all primary substations in Chelmsford have a capacity of more than 5%, indicating that there are no electricity capacity issues in the area (Section 10.3, page 98). There is also no network constraints identified in relation to gas supply (Section 10.2, page 96). In addition, no constraints have been raised by National Grid or UK Power Networks to the site allocation.

238. With regards to broadband, **INF012** reports that new development should be capable of receiving gigabit speed and reliable 5G mobile and broadband connectivity. This is in line with Digital Essex superfast broadband programme and as required by Strategic Policy S9 – Infrastructure Requirements (SD001, page 86 (PDF page 86)). Overall, the evidence base indicates that there are no utility constraints that would prevent the site coming forward for development.

Qp	**Are the essential site specific requirements and mitigation measures justified, and will they, along with other policies in the plan, be effective in achieving sustainable development on the sites?**

CCC Response to Qp

239. It is the Council's position that the development requirements for both sites are justified. The requirements for each site are clearly set out in the main body of the policy, with supporting Reasoned Justification text to further expand on any further guidance on how these requirements should be met. These include:

Site 11b

Landscape impacts – design and layout site policy requirements which require the character, scale and layout to have regard and respond to the site's surrounding context.

Heritage impacts – historic and natural environment site policy requirements which require the setting of Ford End Primary School to be preserved.

Biodiversity impacts – historic and natural environment site policy requirements which require existing natural landscaping and trees within and on the boundary of the site to be retained, and where appropriate mitigating, the potential cumulative effect on the designated features of Thrift Wood SSSI.

Highways impacts – design and layout, movement and access and site infrastructure site policy requirements which require safe and convenient pedestrian and cycle connections, development that promotes and enhances active and sustainablemodes of travel, and provides appropriate improvements to the local and strategic road network.

Site 11c

Landscape impacts – design and layout site policy requirements which require the character, scale and layout to have regard and respond to the site's surrounding context, and development on the western edge to front onto open countryside.

Heritage impacts – historic and natural environment site policy requirements which require the setting of Ford End Primary School to be preserved.

Biodiversity impacts – historic and natural environment site policy requirements which require existing natural landscaping and trees within and on the boundary of the site to be retained, and ensuring a defensible landscape buffer on the site's boundaries, ensuring appropriate habitat mitigation and creation in provided, and assessing, and where appropriate mitigating, the potential cumulative effect on the designated features of Thrift Wood SSSI.

Highways impacts – design and layout, movement and access and site infrastructure site policy requirements which require safe and convenient pedestrian and cycle connections, dedicated pedestrian and cycle links to Barbrook Way, development that maximises opportunities for active and sustainable travel, and provides appropriate improvements to the local and strategic road network.

240. Strategic Policy S16 **(page 83 of SD001)** seeks to ensure that the future delivery of development prioritises attractive, safe and convenient active and sustainable travel over private car reliance. New development will, through design, be required to maximise opportunities for walking and cycling having regard to the Chelmsford Local Cycling and Walking Infrastructure Plan **(T012)**; promote ease of movement within sites; integrate public transport infrastructure to enhance movement between new sites, adjoining areas, and key destinations.

241. ECC, as the Highway Authority, seeks early pre-application discussion with developers and/or land promoters to agree the scope of any Transport Assessment (TA) or Transport Statement (TS) and for the applicant to understand the transportation requirements and strategy for the local area (**INF015, page 48**). Details on the thresholds for TAs and TSs are given in Appendix B of ECC's Development Management Policies February 2011 and any subsequent updates.

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

243. In relation to the site, ECC, as the Highway Authority, undertook early pre-application discussion with the developers to agree the scope of a Transport Assessment (TA) for the applicant to understand the transportation requirements and strategy for the local area (**INF015, page 48**).

244. Site 11c has a resolution to grant planning, subject to the S106. Appropriate mitigation has been secured in terms of highway improvements to accommodate the access and impacts on the adjacent and surrounding highway network. There has also been considerable mitigation secured to provide suitable Active Travel facilities and improvements to Passenger Transport services for the site. These will be promoted by the secured Travel Plan.

245. The Local Plan should be read as a whole and along with the other policies in the Local Plan, the site requirements and mitigation measures will be effective in achieving sustainable development. The Local Plan is considered an appropriate strategy for meeting identified needs in a sustainable way.

Qq	**Are changes to policy wording required to ensure that development does not impact defence operations or assets?**

CCC Response to Qq

246. No changes are required to Strategic Growth Site Policy 11c to ensure there is no impact on the operational or capability of safeguarded defence operation or assets.

247. This site does not lie within the Eastern 2 WAM (Wide Area Multilateration) Network safeguarding zone. Sites which require such a modification (including Growth Site 11b) have been agreed as part of a Statement of Common Ground with the Ministry of Defence **(SOCG036)**.

248. The Council considers that Strategic Growth Site Policy 11c is sound in this regard.

Location 12 – Growth Site Policy 12	
Q6.3	**What is the current planning status of the site (eg masterplans, permissions, completions)? Have there been any changes since the Plan was submitted for examination and if so, are any modifications needed?**

CCC Response to Q6.3

249. The planning status for Growth Site Policy 12 is set out below:

Site	Relevant Masterplan	Relevant Planning Application/s	Housing numbers	Completions on site to date
12	None	Pre-application stage	50	0

250. There have been no changes to the site's planning status since the Plan was Submitted for Examination.

Q6.4	**For the housing sites, what is the basis for the proposed capacity?**

CCC Response to Q6.4

251. The capacity for Growth Site Policy 12 has been informed by pre-application discussions as well as reflecting the benchmark minimum critical mass for Specialist Residential Accommodation.

252. Modification **(MOD Ref 236)** on page 61 (pdf page 62) in **(SD005)** Schedule of Proposed Modifications responds to the latest pre-application enquiries, as updated in the latest April 2026 Five Year Housing Site Schedule **(LDS012)**.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
236	223		Growth Site Policy 12	*Amend first bullet point under Amount and type of development:* Around ~~32~~50 new units for specialist residential	To reflect the latest April 2026 Housing Site Schedule

				accommodation (SRA) that responds positively to the local context.	

Q6.5	**For the sites which include non-residential uses, what is the basis for the scale and type/mix of employment and other uses proposed? Is it justified?**

CCC Response to Q6.5

253. There are no non-residential uses proposed on this site so question not applicable.

Q6.6	**Are the development requirements clear, and are any further safeguards or mitigation measures necessary to achieve an acceptable form of development?**

CCC Response to Q6.6

254. It is the Council's position that the development requirements for Growth Site Policy 12 are clear and consistent with the approach across the Plan. The requirements are clearly set out in the main body of the policy, with supporting Reasoned Justification text to further expand on any further guidance on how these requirements should be met.

255. The Plan should be read as a whole and other policies assist in the detail of how some of these development requirements should be considered. For example, all site policies note that the infrastructure required within the site policy is in addition to the relevant requirements of **SD001** at Strategic Policy S9 – Infrastructure Requirements (page 86 (PDF page 86)), and that financial contributions will be sought in accordance with Strategic Policy S10 – Securing Infrastructure and Impact Mitigation (page 93 (PDF page 93)).

256. The development requirements are clear, and there are no further safeguards or mitigation measures necessary to achieve an acceptable form of development on this site.

Q6.7	**What is the expected timescale and rate of development for the housing sites and is this realistic?**

CCC Response to Q6.7

257. The expected timescale and rate of development is set out in the Housing Site Schedule at Appendix C of the Plan. Sites have been updated with relevant modifications to reflect the latest April 2026 Five Year Housing Site Schedule **(LDS012),** which covers the entire Plan period.
258. Modification (**(MOD Ref 237)** on page 61 (pdf page 62) in **(SD005)** Schedule of Proposed Modifications updates the Reasoned Justification of Growth Site Policy 12 to reflect **LDS012**.

259. The Five Year Housing Land Supply Methodology (April 2026) **(LDS011)** sets out how the Council calculates its five-year housing land supply, but paragraphs 4.1 to 4.15 (page 3-5 of the pdf) set out the combination of methods used by the Council to determine the annual Housing Site Schedule, namely:
    - Regular site visits
    - Information received by Development Managements Planning Officers
    - Building Control weekly reports
    - CIL commencement monthly reports
    - Annual confirmation of delivery rates with developers
    - Monitoring completed developments.

260. The delivery timescale for Growth Site Policy 12, as set out in the Housing Site Schedule (**LDS013**), reflects the fact that is has already been the subject of a two separate pre-application enquiries in 2025 and the form of development is likely to come forward in one phase.

261. For these reasons the expected timescale and rate of development for the site is justified and realistic.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
237	223		Growth Site 12 Paragraph 7.439	*Amend second sentence:* Development is expected to be delivered from ~~2029/30/~~2031 onwards.	To reflect latest April 2026 Housing Sites Schedule

Q6.8	**Are any modifications to the site policy needed for soundness?**

CCC Response to Q6.8

262. There are no modifications required to the site policy for soundness.

Location 13 - Danbury	
Q6.3	**What is the current planning status of the site (eg masterplans, permissions, completions)? Have there been any changes since the Plan was submitted for examination and if so, are any modifications needed?**

CCC Response to Q6.3

263. This location comprises five sites. These have come forward in Danbury through the Neighbourhood Plan process. Danbury Neighbourhood Plan was adopted in December 2024. It forms part of the Local Plan. The five sites and their dedicated policies are as follows:

DNP1-A Land at Sandpit Field, East of Little Fields, page 32 (pdf page 32)
DNP1-B Land at Tyndales Farm West, page 34 (pdf page 34)
DNP1-C Ex-Play Area South of Jubilee Rise, page 37 (pdf page 37)
DNP1-D Danecroft, Woodhill Road, page 39 (pdf page 39)
DNP1-E Land at Mayes Lane, page 41 (pdf page 41)

264. The current planning status for each site is set out below (where a planning application is submitted the housing numbers included in the table are as per the planning application/s for the site):

Site	Relevant Masterplan	Relevant Planning Application/s	Housing numbers	Completions on site to date
Land at Sandpit Field, East of Little Fields	N/A	26/01189/FUL received 27/08/26 for 9 almshouses	10	0
Land at Tyndales Farm West	N/A	24/01786/OUT for up to 72 dwelllings, permission granted 14.08.26	72	0
Ex-Play Area South of Jubilee Rise	N/A	N/A	2	0
Danecroft, Woodhill Road	N/A	24/01643/OUT for 15 dwellings submitted November 2024, Draft S106	15	0

		agreement under review 26/00125/OUT for 6 dwellings		
Land at Mayes Lane	N/A	26/00087/FUL for two dwellings received 26.01.2026	2	0

265. Changes to the site's planning status since the Plan was submitted include:
    - Submission of planning applications for Land at Sandpit Field, East of Little Fields
    - The grant of planning permission for Land at Tyndales Farm West

266. Given the planning status of these sites, the modifications shown in the table below are proposed.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
240	225		25 Strategic Growth Site Policy 13 Paragraph 7.449	*Amend paragraph:* Taking the above constraints and opportunities into account, the Spatial Strategy makes provision for an allocation of ~~around~~ 101~~0~~ homes in total, with site selection through the 'made' Danbury Neighbourhood Plan, expected to be delivered between 2027 and 2030~~during the Local Plan period. Owing to the timing of the Danbury Neighbourhood Plan being 'made', the site allocations in the Neighbourhood Plan are not yet reflected in the April 2024 Housing Site Schedule. This will be updated in the final version of the plan~~. Danbury Parish Council will ~~also~~ receive 25% of the CIL receipt for all new qualifying developments in its area	To reflect latest April 2026 Housing Site Schedule

Q6.4	**For the housing sites, what is the basis for the proposed capacity?**

CCC Response to Q6.4

267. The capacity for the sites within Location 13 have been informed by the site allocations in Danbury Neighbourhood Plan. The planning applications listed above have then set out the more detailed capacity for each relevant site.

Q6.5	**For the sites which include non-residential uses, what is the basis for the scale and type/mix of employment and other uses proposed? Is it justified?**

CCC Response to Q6.5

268. No non-residential uses proposed on these sites so question not applicable.

Q6.6	**Are the development requirements clear, and are any further safeguards or mitigation measures necessary to achieve an acceptable form of development?**

CCC Response to Q6.6

269. It is the Council's position that the development requirements for all five sites are clear and consistent with the approach across the Plan. The requirements for each site are clearly set out in the upper part of Strategic Growth Site Policy 13 (**SD001, page 224, pdf page 224)** and the individual site policies within the Neighbourhood Plan. This is complemented by the supporting Reasoned Justification text to the policies in both documents to further expand on any further guidance on how these requirements should be met.

270. The Plan should be read as a whole and other policies assist in the detail of how some of these development requirements should be considered. For example, Policy DNP1: Housing Allocations on page 29 (pdf page 29) of Danbury Neighbourhood Plan sets out in Part 2 that 'Development will be permitted on the allocated sites subject to meeting the requirements of policies in the Danbury Neighbourhood Plan and Chelmsford Local Plan'. This includes meeting e.g. Trees and Planting Requirements of DNP1-B Land at Tyndales Farm West on page 34 (pdf page 34) of Danbury Neighbourhood Plan and relevant requirements of Strategic Policy S9 **(SD001, page 88, pdf page 88)**. Financial contributions will be sought in accordance with Strategic Policy S10 **(SD001, page 93, pdf page 93)**.

271. The Council is proposing the modifications **(MOD Ref 241 and 242)** on page 62 (pdf page 63) in the Schedule of Proposed Modifications (**SD005)** to the sites at Location 13 to ensure that development does not impact defence operations or assets.

272. The Council considers that Strategic Growth Site Policy 15 is sound, subject to the proposed modifications **MOD Ref 241 and 241** to ensure the site policy is effective.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
241	224		Strategic Growth Site Policy 13	*Insert additional heading and bullet point under Site design principles:* Design and Layout: • Ensure there is no impact on the operational or capability of safeguarded defence assets	To ensure that development does not impact defence operations or assets.
242	224		Strategic Growth Site Policy 13 Paragraph 7.441	*Insert new paragraph after 7.441:* The site lies within the Eastern 2 WAM (Wide Area Multilateration) Network safeguarding zone where a MOD statutory consultation is required as part of any planning application. Technical assets that facilitate air traffic management, primarily radar, navigation, and communications systems are safeguarded to limit the impact of development on their capability and operation. The height, massing and materials used to finish a development may all be factors in assessing the impact of a given scheme. The development should be designed to ensure that it has no impact on the operation or capability of defence sites or assets.	To ensure that development does not impact defence operations or assets.

Q6.7	**What is the expected timescale and rate of development for the housing sites and is this realistic?**

CCC Response to Q6.7

275. The expected timescale and rate of development is set out in the Housing Site Schedule at Appendix C of the Plan. Sites have been updated with relevant modifications to reflect the latest April 2026 Five Year Housing Site Schedule **(LDS012),** which covers the entire Plan period.

276. The Five Year Housing Land Supply Methodology (April 2026) **(LDS011)** sets out how the Council calculates its five-year housing land supply, but paragraphs 4.1 to 4.15 (page 3-5 of the pdf) set out the combination of methods used by the Council to determine the annual Housing Site Schedule, namely:
    - Regular site visits
    - Information received by Development Managements Planning Officers
    - Building Control weekly reports
    - CIL commencement monthly reports
    - Annual confirmation of delivery rates with developers
    - Monitoring completed developments.

277. Regarding Policy DNP1-A Land at Sandpit Field, a detailed planning application was received on 28 August 2026 (26/01189/FUL) for 9 almshouses following pre-application discussions. The site is available now, is a suitable location for development, and as a small site there is a realistic prospect that homes will be delivered on the site within five years. Based on the Council's own monitoring information, the average time from validation to first completions on sites between 1 - 50 units is 2.8 years therefore this site is justified in being considered deliverable. 1 unit should be removed to reflect the 9 units in the submitted planning application.

278. Regarding Policy DNP1-B Land at Tyndales Farm West, a planning application (24/01786/OUT) for up to 72 dwellings was granted planning permission on the 14.08.26. Pre-application discussions relating to a detailed planning application for reserved matters is underway. The Council's own monitoring information shows short timescales for determining REM applications. The delivery timescales were agreed with the planning agent in January 2026.

279. Regarding Policy DNP1-C Ex-Play Area South of Jubilee Rise, the site is available now, and is a suitable location for development. As a very small site in ownership of the Council, there is a realistic prospect that homes will be delivered on the site within five years especially as the Council has an active programme of developing small sites in its ownership with partner Registered Providers. Based on the Council's own monitoring information, the average time from validation to first completions on sites between 1 - 50 units is 2.8 years therefore this site is justified in being considered deliverable

280. Regarding DNP1-E Land at Mayes Lane, an application (26/00087/FUL) for 2 x three-bedroom self-build dwelling with garaging, landscaping and associated operational development was submitted 26/01/26. Delegated decision is awaiting final agreement on the Unilateral Undertaking (to secure the self-build element of the development).

281. For the reasons the expected timescale and rate of development for the sites is justified and realistic.

Q6.8	**Are any modifications to the site policy needed for soundness?**

CCC Response to Q6.8

282. It is the Council's position that with the proposed modifications listed in the table at Q6.6 and set out in **(SD005)** Schedule of Proposed Modifications, the site policy for Strategic Growth Site 13 is sound.

Qr	**Are changes to policy wording required to ensure the development does not impact defence operations or assets?**

283. Please refer to Q6.6 above where this question has been answered in full.

Location 17 – East Hanningfield – Growth Site Policies 17a, 17b, 17 e, Strategic Growth Site Policies 17c and 17d	
Q6.3	**What is the current planning status of the site (eg masterplans, permissions, completions)? Have there been any changes since the Plan was submitted for examination and if so, are any modifications needed?**

CCC Response to Q6.3

284. This location comprises five sites, Growth Sites 17a, 17b, and 17e and Strategic Growth Sites 17c and 17d. The current planning status for each site is shown below:

Site	**Relevant Masterplan**	**Relevant Planning Application/s**	**Housing numbers**	**Completions on site to date**
17a	None	None	11	0
17b	None	None	20	0
17c	None	None	115	0
17d	None	None	150	0
17e	None	None	40	0

285. There have been no changes since the Local Plan was submitted for examination.

Q6.4	**For the housing sites, what is the basis for the proposed capacity?**

CCC Response to Q6.4

286. The capacity for the sites has been informed by design work conducted internally and early discussions with land promoters. For 17c, 17d and 17e this is demonstrated in the Additional Housing Site Studies **(PL018)** (PDF page 9) which shows how the housing sites could be developed to suitably achieve the proposed number of homes and supporting on-site land-uses such as open space and sustainable drainage systems (SUDS). They also demonstrate how site access could be suitably achieved.

Q6.5	**For the sites which include non-residential uses, what is the basis for the scale and type/mix of employment and other uses proposed? Is it justified?**

CCC Response to Q6.5

287. The site allocation policies in Location 17 do not include non-residential uses.

Q6.6	**Are the development requirements clear, and are any further safeguards or mitigation measures necessary to achieve an acceptable form of development?**

CCC Response to Q6.6

288. It is the Council's position that the development requirements for the sites in Location 17 are clear and consistent with the approach across the Local Plan. The requirements for each site are clearly set out in the main body of the policy, with supporting Reasoned Justification text to further expand on any further guidance on how these requirements should be met.

289. The Local Plan should be read as a whole and other policies assist in the detail of how some of these development requirements should be considered. For example, all site policies note that the infrastructure required within the site policy is in addition to the relevant requirements of **SD001** at Strategic Policy S9 – Infrastructure Requirements (page 86 (PDF page 86)), and that financial contributions will be sought in accordance with Strategic Policy S10 – Securing Infrastructure and Impact Mitigation (page 93 (PDF page 93)).

290. In relation to further safeguards, the Council proposes the following modifications to the policy and reasoned justification for Strategic Growth Site Policy 17d to ensure the policy is effective.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
249		47	Strategic Growth Site Policy 17d	*Add additional bullet point under Design and Layout:* • Layout shaped by utility easements	To ensure the policy is effective
250		47	Strategic Growth Site Policy 17d	*Add new sentence to the end of paragraph:* There is a rising main (pressurised sewer) within the site boundary. Layout should safeguard suitable access for	To ensure the policy is effective

				the maintenance of sewerage infrastructure.	

Q6.7	**What is the expected timescale and rate of development for the housing sites and is this realistic?**

CCC Response to Q6.7

291. The expected timescale and rate of development for the sites is set out in the April 2026 Five Year Housing Site Schedule **(LDS012),** which covers the entire Plan period.
Growth Site 17a is expected to be delivered from 2029 onwards.
Growth Site 17b is expected to be delivered from 2029 onwards.
Strategic Growth Site 17c is expected to be delivered from 2028 onwards.
Strategic Growth Site 17d is expected to be delivered from 2028 onwards.
Growth Site 17e is expected to be delivered from 2027 onwards.

292. The Five Year Housing Land Supply Methodology (April 2026) **(LDS011)** sets out sets out how the Council calculates its five-year housing land supply, but paragraphs 4.1 to 4.15 (page 3-5 of the pdf) set out the combination of methods used by the Council to determine the annual Housing Site Schedule, namely:
    - Regular site visits
    - Information received by Development Managements Planning Officers
    - Building Control weekly reports
    - CIL commencement monthly reports
    - Annual confirmation of delivery rates with developers
    - Monitoring completed developments.

293. The delivery timeframe for Strategic Growth Sites 17c and 17d, as set out in the Housing Site Schedule, has been agreed with the site promoter as part of a statement of common ground **(SOCG016)**. The delivery timeframe for Growth Site 17e has also been agreed with the site promoter as part of a statement of common ground **(SOCG022)**.

294. The Council proposes the following modifications to the Reasoned Justification for Growth Site Policy 17a, 17b and 17e to reflect the April 2026 Five Year Housing Site Schedule.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
244	227		Growth Site Policy	*Amend first and second sentence:*	To reflect the latest

			17a Paragraph 7.450	Land north of Abbey Fields is ~~partially within and partially adjacent to~~ located on the northern edge of the Defined Settlement of East Hanningfield. Development is expected to be delivered from 203~~0~~29/203~~1~~30 onwards.	housing site schedule
246	228		Growth Site Policy 17b Paragraph 7.456	*Amend second sentence:* Development is expected to be delivered from 203~~0~~29/203~~1~~30 onwards.	To reflect the latest housing site schedule
251		51	Strategic Growth Site Policy 17e Paragraph 2.156	*Amend first sentence:* Development is expected to be delivered between 202~~7~~8 and 202~~8~~9	To reflect the latest housing site schedule

Q6.8	**Are any modifications to the site policy needed for soundness?**

CCC Response to Q6.8

295. It is the Council's position that with the proposed modifications listed in the table below and set out in **(SD005)** Schedule of Proposed Modifications, in addition to the modifications at Q 6.6 and Q6.7, the site policies for the sites in Location 17 are sound.

296. Other proposed additional modifications are set out in **SD005** but these do not go to matters of soundness

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
247		44	Strategic Growth Site Policy 17c	*Amend fourth bullet point under Historic and Natural Environment:* • Provide a robust open landscape buffer to the site boundary east of Willis Farm	

				Amend first bullet point under Design and layout: • Character, scale and layout to have regard and respond to the site's surrounding context, including limiting development <u>density and</u> height to two storeys on the western edge	
248		46	Strategic Growth Site Policy 17c Paragraph 2.137	*Amend second sentence:* Development design and layout is expected to preserve or enhance the character or appearance of the East Hanningfield The Tye Conservation Area and preserve the listed buildings close to the site, including an <u>open</u> landscape buffer of around 20m to the site boundary east of Willis Farm, and limiting <u>density and</u> development scale to two storeys on the western edge of the site	

Q s	**Does the quantum of development proposed in sites 17a-17e, both individually and cumulatively, accord with the Spatial Principles and Spatial Strategy set out in Strategic Policies S1 and S7?**

CCC Response to Qs

297. It is the Council's position that the quantum of development in Location 17 accords with the Spatial Principles and Spatial Strategy.

298. Strategic Policy S1 – Spatial Principles **(SD001)** (page 46 (PDF page 46)) ensures that the Local Plan focuses growth in the most sustainable locations. Allocation of these sites in Location 17 accords with the following Spatial Principles:

a) Locate development at well-connected and sustainable locations
b) Protect the Green Belt from inappropriate development

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

299. East Hanningfield is classified as a Service Settlement within the Settlement Hierarchy set out in Strategic Policy S7 - The Spatial Strategy **(SD001)** (page 70 (pdf page 70)).

300. East Hanningfield has an existing primary school with capacity and potential for expansion if needed, employment opportunities including two industrial areas, and community facilities (including two restaurants, shop/post office, and a private baby and toddler swimming facility) making it suitable for new development. More information about services and facilities in East Hanningfield can be found in the Parish Audit **(PL002) (**pdf page 8) which was carried out to support the Local Plan and inform the settlement hierarchy.

301. Strategic Policy S7 (paragraph 6.22, page 76 (PDF page 76)) also reflects the National Planning Policy requirement for councils to identify land in local plans to accommodate ten percent of their housing requirement figure on sites no larger than one hectare. Sites 17a and 17b are each under a hectare, and therefore contribute towards the 10% small sites target.

302. This site represents a sustainable development allocation which will help to support the services and facilities in the village. The Local Plan evidence base including traffic modelling, heritage assessment, and landscape capacity and sensitivity assessment show that there are no overriding constraints that would hinder the delivery of the site.

Q t	**What is the likely impact of the proposed allocations, including the cumulative impact, on the following factors:** • **The strategic and local highway network including public transport and active travel** • **Agricultural land quality, landscape character, biodiversity and heritage assets** • **Flood risk, air quality, noise and light pollution** • **Other infrastructure, including education, health, recreation and utilities**

	How were the above impacts assessed, and what evidence is the Council relying on?

CCC Response to Qt

Strategic and local highway network

303. Transport evidence base modelling **(T006A and T007)** undertaken for the latter stages of Plan development considers the cumulative impact of development and mitigation on the strategic road network across the City of Chelmsford. This is aligned with guidance on 'Transport evidence bases in plan making and decision taking', published by MHCLG. (https://www.gov.uk/guidance/transport-evidence-bases-in-plan-making-and-decision-taking)

304. An appraisal of the highway impact of Local Plan Review additional sites to the south of Chelmsford is documented in evidence base report **T007**. The 'Summary of Findings and Conclusions' on page 40 suggests that the addition of trips from these sites to the road network will lead to the displacement of background traffic flows, potentially causing a small quantum of 'rat-running' through West Hanningfield, but resulting in little overall change to the forecast modelled capacity of A12 Junction 17 at Howe Green.

305. Whilst the transport evidence base does not assess the specific impact of the proposed allocation or identify site-specific mitigation for smaller sites, the quantum of trip generation at SGS17 sites is expected to have a low impact on the road network at a strategic level. The local road network will be expected to be assessed in more detail by site promoters as part of a planning application. Measures to mitigate highway impact at a local level will then need to be agreed with ECC as the highway authority (and National Highways, where relevant).

306. In relation to how the impacts were assessed and the evidence the Council is relying on, Strategic Policy S16 **(page 83 of SD001)** seeks to ensure that the future delivery of development prioritises attractive, safe and convenient active and sustainable travel over private car reliance. New development will, through design, be required to maximise opportunities for walking and cycling having regard to the Chelmsford Local Cycling and Walking Infrastructure Plan **(T012);** promote ease of movement within sites; integrate public transport infrastructure to enhance movement between new sites, adjoining areas, and key destinations.

307. ECC, as the Highway Authority, seeks early pre-application discussion with developers and/or land promoters to agree the scope of any Transport Assessment (TA) or Transport Statement (TS) and for the applicant to understand the transportation requirements and strategy for the local area (**INF015, page 48**). Details on the thresholds for TAs and TSs are given in Appendix B of ECC's Development Management Policies February 2011 and any subsequent updates.

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

Agricultural land quality

309. Growth Site 11b and Strategic Growth Site 11c are currently greenfield sites, so development will result in the loss of agricultural land. In line with Strategic Policy S4, the Local Plan seeks to minimise the loss of the best and most versatile agricultural land **(SD001)** (page 61, PDF page 61)). However, to meet development needs it is inevitable that some agricultural land will be lost. The proposed allocation will make an important contribution towards meeting identified needs for housing over the plan period. The allocation is also supported by the Additional Sites Integrated Impact Assessment which identifies significant positive effects in relation to housing **(SD009)** Appendix C (page 9, PDF page 75)). Overall, it is considered that the loss of agricultural land to accommodate the proposed development is justified when balanced against the need for new homes and the sustainability benefits of the site.

310. Natural England's Agricultural Land Classification has been used to assess the quality of agricultural land in the Council area. This is set out at paragraph 2.25 and Figure 10 of the Pre-Submission Local Plan **(SD001)** (page 30-31 (PDF pages 30-31)). Most agricultural land lost as a result of new development will be Grade 3. This will lead to a loss of approximately 922 hectares of Grade 3 agricultural land and approximately 264 hectares of Grade 2 land. This equates to around 2.6% of the total Grade 2 land and around 4.5% of the total Grade 3 land in Chelmsford's administrative area (**SD002**, paragraph 3.27 (page 71)).

Landscape character

311. Landscape character and sensitivity is assessed across two documents: The Landscape Sensitivity and Capacity Assessment for Adopted Local Plan Sites **(PL004-A)** (Section 8, page 110 (PDF page 132)) and Landscape Sensitivity and Capacity Study Preferred Options **(PL004-E)** (Section 7, page 93 (PDF page 107)).

312. The assessments are conducted across a number of parcels, which relate to the site allocations as follows:

Site allocation	Landscape parcel	Conclusion
17a	EHLP5	Moderate overall landscape sensitivity, moderate landscape value, and medium landscape capacity
17b	EHLP1	Moderate overall landscape sensitivity, moderate landscape value, and medium landscape capacity
17c	EHLP2	High overall landscape sensitivity, moderate landscape value, and low to medium landscape capacity
17d	EHLP4 (part)	Moderate overall landscape sensitivity, moderate landscape value, and medium landscape capacity
17e	EHLP6	Moderate overall landscape sensitivity, moderate landscape value, and medium landscape capacity

313. Mitigation guidelines include maintenance and strengthening of existing hedgerows, and respect for the sensitivity of the existing built edge of development. Overall, it is considered that these impacts that can be appropriately mitigated through requirements which have been included in the site allocation policies and wider policies of the Plan.

314. Heritage assets have been assessed through a series of Heritage Impact Assessments to support all site allocations. There are no designated heritage assets within the site boundaries. The relevant evidence documents are the Heritage Assessments – Rural Sites **(PL006)** (Section 3.0, pages 5-9 (PDF pages 6-10)); and the Additional Sites Heritage Assessments **(PL014)** (Section 11.0, PDF pages 23-26). These identify heritage assets including Rails Farm, Willis Farm, Paprills Farm, Huntingdons Farm, The Old Forge, K6 Telephone Box, and Shepherds Cottage (non-designated). The principles for the heritage assets and their settings are set out in the assessments and were used to inform the heritage requirements for the site policy.

Biodiversity and green infrastructure, including European sites

315. The site allocation policy in combination with wider policies in the Plan will ensure that any negative biodiversity impacts are assessed and, where appropriate, mitigated. In addition, site policy requirements for the natural environment will ensure that development provides a landscape buffer on site boundaries and retains existing natural landscaping and trees. DM16 - Protection and Promotion of Ecology, Nature and Biodiversity **(SD001)** (page 272 (PDF page 272)) will ensure that development provides a minimum 10% biodiversity net gain above the ecological baseline value of the sites. Furthermore, Policy DM17 – Trees, Woodland and Landscape Features **(SD001)** (page 276 (PDF page 276)) will support biodiversity on the sites by requiring the developments to plant new trees as part of landscaping requirements. Overall, it is considered that the site allocation policies and wider policies of the Plan will increase the biodiversity of the sites.

Flood risk

316. Site 17a is in Flood Zone 1. The site is at significant risk of surface water flooding. Informed by a site level flood risk assessment, it is considered that the risk can be mitigated and managed as part of layout design at the planning application stage. This would ensure the development is safe throughout its lifetime and does not increase flood risk elsewhere. Site planning should ensure development is steered away from the southwest border areas identified as being at risk of surface water flooding and existing drainage features should be incorporated into the sustainable drainage design strategy. This accords with NPPF paragraphs 167 and 173 and is set out in Sequential and Exception Test 2024 **(CC012, pages 54-55, pdf pages 56-57)**.

317. Site 17b was not subject to a Level 2 Strategic Flood Risk Assessment site study. This is because it is in Flood Zone 1 and the assessment identifies it as at very low risk of flooding from all sources. At one hectare, a site specific flood risk assessment will be needed at the planning application stage (NPPF Footnote 59 page 49). Site planning should ensure that the development would follow the sequential approach, demonstrate sustainable drainage principles and systems, remain safe now and into the future and not worsen flood risk elsewhere, NPPF paragraph 173. The approach to site screening is set out at paragraphs 5.2 and 5.3 of the Level 2 Strategic Flood Risk Assessment 2024 **(CC010, pages 30-34, pdf pages 46-51)**.

318. Site 17c is in Flood Zone 1. A small section is at high risk of surface water flooding. Informed by a site level flood risk assessment, it is considered that the risk can be mitigated and managed as part of layout design at the planning application stage. This would ensure the development is safe throughout its lifetime and does not increase flood risk elsewhere. Site planning should ensure development is steered away from areas identified as being at risk of surface water flooding and existing drainage features should be incorporated into the sustainable drainage design strategy. This accords with NPPF paragraphs 167 and 173 and is set out in Additional Sites Sequential and Exception Test 2025 **(CC019, pages 24-25, pdf pages 25-26)**.

319. Site 17d is in Flood Zone 1. A section is at high risk of surface water flooding. Informed by a site level flood risk assessment, it is considered that the risk can be mitigated and managed as part of layout design at the planning application stage. This would ensure the development is safe throughout its lifetime and does not increase flood risk elsewhere. Site planning should ensure development is steered away from areas identified as being at risk of surface water flooding and existing drainage features should be incorporated into the sustainable drainage design strategy. This accords with NPPF paragraphs 167 and 173 and is set out in Additional Sites Sequential and Exception Test 2025 **(CC019, pages 26-28, pdf pages 27-29).**

320. Site 17e is in Flood Zone 1. A small section is at high risk of surface water flooding. Informed by a site level flood risk assessment, it is considered that the risk can be mitigated and managed as part of layout design at the planning application stage. This would ensure the development is safe throughout its lifetime and does not increase flood risk elsewhere. Site planning should ensure development is steered

away from areas identified as being at risk of surface water flooding and existing drainage features should be incorporated into the sustainable drainage design strategy. This accords with NPPF paragraphs 167 and 173 and is set out in Additional Sites Sequential and Exception Test 2025 **(CC019, pages 29-30 (pdf pages 30-31).**

Air quality

321. Air quality impacts were assessed though two air quality impact assessments, for the Pre-Submission Local Plan **(CC014)** and the Additional Sites Document **(CC016)**. **CC014** concludes that the impact of the Local Plan in 2041 can be considered negligible for all pollutants (page 36 (PDF page 36)); **CC016** concludes similarly that the impact of the Local Plan, including the additional sites, is considered to be negligible (page 15 (PDF page 15)). Further analysis through the Habitats Regulations Assessment (within the Pre-Submission Integrated Impact Assessment **(SD008)** also concluded that the Local Plan will have no adverse effects on European Sites considered vulnerable in terms of air quality (page 98, PDF page 1017). The Additional Sites IIA Addendum **(SD009)** confirms that the additional allocations do not change that conclusion (paragraph 3.29, page 9 (PDF page 127)).

Noise and light pollution

322. Noise and light pollution impacts have been assessed through the Habitats Regulations Assessment (within the Pre-Submission Integrated Impact Assessment **(SD008)**). Section 3.1 (page 16 (PDF page 936)) explains that in some matters a Local Plan can affect European sites through individual allocations or 'in combination' effects from cumulative impacts, known as effect pathways. Typical environmental changes including noise changes and introduction of light are included in Table 3-1. Appropriate assessments undertaken for these effect pathways demonstrate that the Local Plan will have no adverse effects on the integrity of any European sites (paragraph 9.2.2., page 97 (PDF page 1017)).

Education

323. The Council has worked in collaboration with Essex County Council (ECC), the lead authority for Education, to ensure sufficient education places (including Early Years and Childcare) arising from new development are provided over the Plan period. The education assessment **(INF007)** has been carried out in accordance with ECC's Developers' Guide to Infrastructure Contributions (Revised 2024) **(INF015)** and the education contributions included within these site policies under '*Site infrastructure requirements'*.

Health

324. The potential impact of the Local Plan on health provision is assessed through the Infrastructure Delivery Plan (IDP) **(INF012)** and updated in the Post Consultation Amendments to IDP in response to MIQs **(INF012-A)**. Section 12 of **INF012** (PDF pages 114-129) explores primary and secondary healthcare, specialist and supported

housing, and ambulance services. Recommendations on the infrastructure required to support growth have been translated into the infrastructure delivery schedules at Appendix A (from PDF page 207 and as updated in **INF012-A**) and incorporated into the site policy requirements.

Recreation

325. The potential impact of the Local Plan on recreation is assessed through the Infrastructure Delivery Plan (IDP) **(INF012)**. Section 7 of **INF012** (PDF pages 62-79) explores green infrastructure, and indoor and outdoor sports facilities. Recommendations on the infrastructure required to support growth have been translated into the infrastructure delivery schedules at Appendix A (from PDF page 150) and incorporated into the site policy requirements.

Utilities

326. The likely impact of the Local Plan on utilities including water supply, sewerage, provision of energy and broadband is assessed through the Infrastructure Delivery Plan (IDP) **(INF012)**. This evidence base report does not identify any utility capacity constraints that would hinder delivery of the proposed site allocation.

327. With regards to water supply, Essex and Suffolk Water recommends early engagement on planning applications so that phasing of development and connections can be agreed. This is set out in the statement of common ground **(SOCG041)** (page 6, PDF page 7)).

328. In respect of sewerage, a response is included in the response to Qv.

329. In relation to energy, **INF012** reports that all primary substations in Chelmsford have a capacity of more than 5%, indicating that there are no electricity capacity issues in the area (Section 10.3, PDF page 98). There is also no network constraints identified in relation to gas supply (Section 10.2, page 96). In addition, no constraints have been raised by National Grid or UK Power Networks to the site allocation.

330. With regards to broadband, **INF012** reports that new development should be capable of receiving gigabit speed and reliable 5G mobile and broadband connectivity. This is in line with Digital Essex superfast broadband programme and as required by Strategic Policy S9 – Infrastructure Requirements (SD001, page 86 (PDF page 86)). Overall, the evidence base indicates that there are no utility constraints that would prevent the site coming forward for development.

Qu	**Are the essential site specific requirements and mitigation measures justified, and will they, along with other policies in the plan, be effective in achieving sustainable development on the sites?**

CCC Response to Qu

331. It is the Council's position that the development requirements for all sites in this location are justified. The requirements for each site are clearly set out in the main body of the policy, with supporting Reasoned Justification text to further expand on any further guidance on how these requirements should be met.

332. The Local Plan should be read as a whole and along with the other policies in the Local Plan, the site requirements and mitigation measures will be effective in achieving sustainable development. The Local Plan is considered an appropriate strategy for meeting identified needs in a sustainable way.

Q v	**Can required capacity increases in wastewater treatment and disposal be provided to support development within the timescales set out?**

CCC Response to Q v

333. As set o set out in full in response to Matter 10, Q10.12, Chapter 5 of the Chelmsford Council Water Cycle Study Stage 2 – Detailed Water Cycle Study (WCS) **(CC003, February 2024, pages 74-105, pdf pages 74-105)** contains an assessment of the capacity of the existing wastewater infrastructure (piped network and water recycling centres (WRCs)) to accommodate the increase in foul flows as a result of the population increase due to the planned proposed developments within the Council's administrative area.

334. Section 5.8 of the Stage 2 WCS **(CC003, pages 91 – 104, pdf pages 91-104)** sets out details of the Water Recycling Centre Capacity Assessment undertaken as part of the Stage 2 Study.

335. An Addendum to **CC003**, Chelmsford Water Cycle Study Detailed Water Cycle Study Addendum **(CC017)** was produced in October 2025. It updates the Water Recycling Centre and Sewerage Network Capacity Assessment to consider the impact of 15 potential additional site allocations. Some of these sites are contained within the South Woodham Ferrers catchment WRC. The Assessment Results are set out in Section 3.3 of the Addendum **(CC017, pages 27-39, pdf pages 27-39)**.

336. Section 3.4.2 of the Addendum Stage 2 WCS **(CC017, page 40, pdf page 40)** sets out Anglian Water Service's comments on the updated Assessment. The key points in relation to the South Woodham WRC are summarised below:

South Woodham WRC - *There is currently no DWF permit headroom. A growth scheme is planned for this WRC with a planned delivery by the end of Asset Management Plan 8 (AMP8), March 2030, to enable further capacity to accommodate future development. Due to no capacity for growth, AWS recommended a pre-occupancy condition to ensure that development is only occupied when there is sufficient capacity at the WRC, i.e. when the growth scheme is delivered.*

For South Woodham WRC, the Addendum Stage 2 WCS recommends that a pre-occupancy condition is required as part of the Local Plan policy and planning permissions so that no new dwellings can be connected until the AMP8 scheme has been delivered. In addition, it is recommended that new sites connecting within this catchment will need to be assessed via a pre-planning enquiry **(CC017, page 40, pdf page 40)**.

337. However, following on from the comments from Anglian Water in **CC017**, the Council's Statement of Common Ground with the Environment Agency **(SOCG018, page 8, pdf page 9)** reaches an agreed resolution, that the relevant developers should discuss the timing of occupancy with AWS prior to the submission of a planning application and submit with the planning application details of those discussions including agreement to the phasing of development. Similarly, this position is agreed in the Statement of Common Ground with Anglian Water (**SOCG019, page 12**). All relevant parties are therefore in agreement that there is no need for pre-occupancy conditions to be required for sites in Location 17 due to the policy support provided by Strategic Policy S4 and Strategic Policy S10 **(SD001, pages 61 and 93, pdf pages 61 and 93)**.

338. Completions are anticipated from these sites in year 2028 onwards. It may be the case that at the time of consideration of any planning application there is still some limited headroom at the WRC which can accommodate this growth. Whether headroom is available will depend on the actual flows, existing commitments and permit position at the relevant time.

339. Anglian Water will be consulted and respond on individual planning applications. These responses will represent a point-in-time assessment of available DWF headroom taking account of relevant committed development, whereas the WCS considers the cumulative implications of planned Local Plan growth over the plan period, based on the average DWF. It is therefore appropriate to consider the full implications of these sites through their relevant planning applications and through the application of Policy S4 which, subject to the suggested modifications set out in Matter 10 (Q10.12), make allowances for additional capacity to be found if required.

340. Therefore, the site policies for this location, in combination with the requirements of Strategic Policy S4 make allowances for additional capacity to be found, which could include improvements to the existing Great Leighs WRC by Anglian Water, but may

also be through on-site wastewater treatment systems solutions, subject to the necessary environmental permitting processes. This allows for the site developers to put in place any on-site wastewater treatment system solutions in absence of Anglian Water's upgrades coming forward in time.

341. The Council considers that Site Policies for Location 17 are sound in this respect.

Location 20 – Rettendon Place – Strategic Growth Site 20	
Q6.3	**What is the current planning status of the site (eg masterplans, permissions, completions)? Have there been any changes since the Plan was submitted for examination and if so, are any modifications needed?**

CCC Response to Q6.3

342. This site is promoted by a single developer, Croudace Homes. A statement of common ground **(SOCG017)** has been signed with the site promoter. The Council is expecting a masterplan to be produced in accordance with the requirement of the site policy.

343. The current planning status for this site is summarised in the table set out below:

Site	Relevant Masterplan	Relevant Planning Application/s	Housing numbers	Completions on site to date
Strategic Growth Site Policy 20	N/A	N/A	350	0

344. There have been no changes to the sites planning status since the Plan was Submitted for Examination.

Q6.4	**For the housing sites, what is the basis for the proposed capacity?**

CCC Response to Q6.4

345. The Local Plan policy for Strategic Growth Site 20 states that around 350 new homes of mixed size and type to include affordable housing are to be provided.

346. The capacity for Strategic Growth Site Policy 20 has been informed by design work conducted internally and early discussions with the site promoters. This is demonstrated in the Additional Housing Site Studies **(PL018)** (PDF page 10) which shows how the housing sites could be developed to suitably achieve the proposed number of homes and supporting on-site land-uses such as education facilities and potential retail uses, open space and sustainable drainage systems (SUDS). They also demonstrate how site access could be suitably achieved.

347. The final number of new homes will be confirmed through the planning application process.

Q6.5	**For the sites which include non-residential uses, what is the basis for the scale and type/mix of employment and other uses proposed? Is it justified?**

CCC Response to Q6.5

348. Strategic Growth Site Policy 20 includes a requirement for small-scale convenience retail.

349. The requirement is justified as the unit will help to meet day-to-day needs of the local community. This should be of no more than 500sqm which is considered an appropriate industry standard which would not lead to an adverse impact on the City Centre and is consistent across the Plan. The Chelmsford Retail Capacity Study 2023 **(ECON001)**, pdf page 81 – 82, found that retail (convenience and comparison) and leisure developments of less than the default national threshold of 2,500sqm could have an impact on existing centres outside Designated Centres and recommends that a 500sqm gross threshold should apply across the whole of the Council's administrative area (for retail proposals outside of designated Primary Shopping Areas and for leisure proposals outside of City/Town Centre boundaries). A modification is proposed in response to Q6.8 below to ensure this policy requirement is clear and effective.

350. Strategic Growth Site Policy 20 also includes a requirement for the expansion of existing primary school (Use Class (F1(a)) and expansion of existing or new stand-alone early years and childcare nursery (Use Class E(f)).

351. The Council has worked in collaboration with Essex County Council (ECC), the lead authority for Education, to ensure sufficient education places (including Early Years and Childcare) arising from new development are provided over the Plan period. The education assessments **(INF007 and INF008)** have been carried out in accordance with ECC's Developers' Guide to Infrastructure Contributions (Revised 2024) **(INF015)** and the education requirements included with the relevant site policies under `*Site Infrastructure Requirements'*.

352. The area of land that ECC requires for schools is based on the relevant Department for Education Building Bulletins (i.e. BB103 within the 2024 Guide). In line with its aspiration to increase educational achievement and enhance skills, ECC always seeks site areas towards the top end of the recommended range. Government also encourages 'extended schools' that include other community services and, clearly, larger sites are required if joint use of school facilities is to be considered. In order to produce a school with manageable year groups, ECC may require slightly more land than is indicated by a straightforward calculation of pupils from a development. The following figures are a guide to likely requirements in terms of land and are reflected in the site policy requirements for education.

Type of Education	Size	Land Area (ha)	Reference
Early Years and Childcare stand-alone facility	56 place	0.13 ha	Table 1

360. In the case of Strategic Growth Site 20 the existing primary school adjacent to the site is at capacity so an additional 0.36ha of land for expansion will be required to enable the expansion of the school. Furthermore, to serve the proposed new residential development an extension of the existing nursery or new 30 place stand-alone early years and childcare nursery (Use Class (E(f)) on 0.11 hectares of suitable land should form part of the development proposals. The nursery accommodation could be built by ECC, the developer or a private early years nursery operator. This will be considered, alongside the selection of early years provider at site masterplanning and planning application stages in consultation with ECC.

361. The Council considers that the scale and type/mix of employment and other uses proposed for Strategic Growth Site Policy 20 are justified.

Q6.6	**Are the development requirements clear, and are any further safeguards or mitigation measures necessary to achieve an acceptable form of development?**

CCC Response to Q6.6

362. It is the Council's position that the development requirements for this site are clear and consistent with the approach across the Plan. The requirements for each site are clearly set out in the main body of the policy, with supporting Reasoned Justification text to further expand on any further guidance on how these requirements should be met.

363. The Plan should be read as a whole and other policies assist in the detail of how some of these development requirements should be considered. For example, all site policies note that the infrastructure required within the site policy is in addition to the relevant requirements of **SD001** at Strategic Policy S9 – Infrastructure Requirements (page 86 (PDF page 86)), and that financial contributions will be sought in accordance with Strategic Policy S10 – Securing Infrastructure and Impact Mitigation (page 93 (PDF page 93)).

364. The development requirements are clear, and there are no further safeguards or mitigation measures necessary to achieve an acceptable form of development on this site.

Q6.7	**What is the expected timescale and rate of development for the housing sites and is this realistic?**

CCC Response to Q6.7

365. The expected timescale and rate of development is set out in the Housing Site Schedule at Appendix C of the Plan. Sites have been updated with relevant modifications to reflect the latest April 2026 Five Year Housing Site Schedule **(LDS012),** which covers the entire Plan period.

366. The Five Year Housing Land Supply Methodology (April 2026) **(LDS011)** sets out how the Council calculates its five-year housing land supply, but paragraphs 4.1 to 4.15 (page 3-5 of the pdf) set out the combination of methods used by the Council to determine the annual Housing Site Schedule, namely:
    - Regular site visits
    - Information received by Development Managements Planning Officers
    - Building Control weekly reports
    - CIL commencement monthly reports
    - Annual confirmation of delivery rates with developers
    - Monitoring completed developments.

367. Strategic Growth Site 20 is expected to be delivered from 2028 onwards. The delivery timeframe, as set out in the Housing Site Schedule, has been agreed with the site promoter as part of a statement of common ground **(SOCG017)**.

368. For these reasons the expected timescale and rate of development for the site is justified and realistic.

Q6.8	**Are any modifications to the site policy needed for soundness?**

CCC Response to Q6.8

369. The Council considers that the site policy is sound, subject to a proposed new modification to ensure the policy requirement for a small-scale retail unit is clear and effective.

370. Other proposed additional modifications to the site are set out in **(SD005)** Schedule of Proposed Modifications but these do not go to matters of soundness.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
NEW		54	Paragraph 2.167	*Amend:* As part of the development there is an opportunity for a small convenience retail unit of no more than 500sqm gross floorspace to be provided on site to serve this locality.	For clarity and to ensure the policy is effective

Qw	**Does the quantum of development proposed in SGS Policy 20 accord with the Spatial Principles and Spatial Strategy set out in Strategic Policies S1 and S7?**

CCC Response to Qw

371. It is the Council's position that the quantum of development in Location 20 accords with the Spatial Principles and Spatial Strategy.

372. Strategic Policy S1 – Spatial Principles **(SD001)** (page 46 (PDF page 46)) ensures that the Local Plan focuses growth in the most sustainable locations. Allocation of these sites in Location 20 accords with the following Spatial Principles:
a) Locate development at well-connected and sustainable locations
b) Protect the Green Belt from inappropriate development
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

373. Rettendon Place is classified as a Service Settlement within the Settlement Hierarchy set out in Strategic Policy S7 - The Spatial Strategy **(SD001)** (page 71 (pdf page 71)).

374. Rettendon Place has an existing primary school with scope for expansion, and community facilities. More information about services and facilities in Rettendon Place can be found in the Parish Audit **(PL002) (**pdf page 8) which was carried out to support the Local Plan and inform the settlement hierarchy.

375. The site proposed is a smaller area than promoted by the developer/landowner to ensure impact on the surrounding landscape is acceptable. The plan evidence base

including traffic modelling, heritage assessment, and landscape capacity and sensitivity assessment show that there are no overriding constraints that would hinder the delivery of the site, which will contribute to housing supply in the first five years of the plan adoption.

376. The Council considers that Strategic Growth Site Policy 20 is sound.

Qx	**What is the likely impact of the proposed allocation on the following factors:** **• The strategic and local highway network including public transport and active travel** **• Agricultural land quality, landscape character, biodiversity and heritage assets** **• Flood risk, air quality, noise and light pollution** **• Other infrastructure, including education, health, recreation and utilities** **How were the above impacts assessed, and what evidence is the Council relying on?**

CCC Response to Qx

<u>The strategic and local highway network including public transport and active travel</u>

377. Transport evidence base modelling **(T006-A and T007)** undertaken for the latter stages of Plan development considers the cumulative impact of development and mitigation on the strategic road network across the City of Chelmsford. This is aligned with guidance on 'Transport evidence bases in plan making and decision taking', published by MHCLG. (https://www.gov.uk/guidance/transport-evidence-bases-in-plan-making-and-decision-taking)

378. An appraisal of the highway impact of Local Plan Review additional sites to the south of Chelmsford is documented in evidence base report **T007**. The 'Summary of Findings and Conclusions' on page 40 suggests that the addition of trips from these sites to the road network will lead to the displacement of background traffic flows, potentially causing a small quantum of ‘rat-running’ through West Hanningfield, but resulting in little overall change to the forecast modelled capacity of A12 Junction 17 at Howe Green.

379. Whilst the transport evidence base does not assess the specific impact of the proposed allocation or identify site-specific mitigation for smaller sites, the quantum of trip generation at SGS20 is expected to have a low impact on the road network at a

strategic level. The local road network will be expected to be assessed in more detail by site promoters as part of a planning application. Measures to mitigate highway impact at a local level will then need to be agreed with ECC as the highway authority (and National Highways, where relevant).

Agricultural land quality

380. Strategic Growth Site 20 is currently a greenfield site, so development will result in the loss of agricultural land. In line with Strategic Policy S4, the Local Plan seeks to minimise the loss of the best and most versatile agricultural land **(SD001)** (page 61, PDF page 61)). However, to meet development needs it is inevitable that some agricultural land will be lost. The proposed allocation will make an important contribution towards meeting identified needs for housing over the plan period. The allocation is also supported by the Additional Sites Integrated Impact Assessment which identifies significant positive effects in relation to housing **(SD009)** Appendix C (page 13-14, PDF page 79-80)). Overall, it is considered that the loss of agricultural land to accommodate the proposed development is justified when balanced against the need for new homes and the sustainability benefits of the site.

381. Natural England's Agricultural Land Classification has been used to assess the quality of agricultural land in the Council area. This is set out at paragraph 2.25 and Figure 10 of the Pre-Submission Local Plan **(SD001)** (page 30-31 (PDF pages 30-31)). Most agricultural land lost as a result of new development will be Grade 3. This will lead to a loss of approximately 922 hectares of Grade 3 agricultural land and approximately 264 hectares of Grade 2 land. This equates to around 2.6% of the total Grade 2 land and around 4.5% of the total Grade 3 land in Chelmsford's administrative area **(SD002),** paragraph 3.27 (page 71).

Landscape character

382. The Additional Sites - Landscape Sensitivity and Capacity Study October 2025 **(PL013)** (page 61-68, PDF page 72-80)) assesses the likely impacts of the proposed site allocation on the landscape. This concludes that the site has moderate overall landscape sensitivity and low value with a medium to high capacity to accommodate low rise residential and employment development. However, the woodland is probably inappropriate for development and better serves as part of the screening and landscape enhancement of the Parcel RPLP2 of which it is a part. The role of the woodland is likely to be particularly important in respect of creating a new settlement edge to the north of RPLP2. Guidelines are included for retaining and strengthening of existing hedgerows, and the built edge of development. Overall, it is considered that these impacts that can be appropriately mitigated through requirements in the site allocation policy and wider policies of the Plan.

Biodiversity

383. The site allocation policy requirements for the natural environment will ensure the development provides a landscape buffer on site boundaries and retains existing

natural landscaping and trees. DM16 - Protection and Promotion of Ecology, Nature and Biodiversity **(SD001)** (page 272 (PDF page 272)) will ensure the development provides a minimum 10% biodiversity net gain above the ecological baseline value of the site. Furthermore, Policy DM17 – Trees, Woodland and Landscape Features **(SD001)** (page 276 (PDF page 276)) will support biodiversity on the site by requiring the development to plant new trees as part of landscaping requirements. Overall, it is considered that the site allocation policy and wider policies of the Plan will increase the biodiversity of the site. This is also supported by the Additional Sites Integrated Impact Assessment **(SD009)**. Although this identifies negative effects from the site allocation in relation to biodiversity given the site sits within 800m of a local wildlife site and ancient woodland, it concludes that the mitigation measures provided in the site policy are appropriate Appendix C (page 14 (PDF page 80)).

Heritage assets

384. Heritage assets have been assessed through a series of Heritage Impact Assessments to support all site allocations. The relevant Heritage Assessment is the Additional Sites Heritage Assessments **(PL014)** (Section 12.0, PDF page 27), which identifies a collection of designated and non-designated heritage assets, including the prominent and visible grade I listed All Saints Church, together with the siting of the church, Grade II listed Rettendon Old Hall, a farmyard of traditional and modern buildings lying to the north and the original school building and school masters house of Rettendon Primary School. The principles for heritage assets and their settings are set out on PDF page 29 and were used to inform the heritage requirements for the site policy.

Flood risk

385. The site is in Flood Zone 1. A small section of the site is at risk of surface water flooding, but overall risk of flooding from all sources, now and into the future, is low. With sound site planning, and taking a sequential approach to risk, it is feasible to ensure that the residential-led land uses, are safe by locating development towards areas of lowest risk and away from surface water flooding. Flood risk will not be worsened elsewhere with sound site planning. This is set out in the Additional Sites Sequential and Exception Test document **(CC019)** (pages 36-37, pdf pages 37-38).

Air quality

386. Air quality impacts were assessed though two air quality impact assessments, for the Pre-Submission Local Plan **(CC014)** and the Additional Sites Document **(CC016)**. **CC014** concludes that the impact of the Local Plan in 2041 can be considered negligible for all pollutants (page 36 (PDF page 36)); **CC016** concludes similarly that the impact of the Local Plan, including the additional sites, is considered to be negligible (page 15 (PDF page 15)). Further analysis through the Habitats Regulations Assessment (within the Pre-Submission Integrated Impact Assessment **(SD008)** also concluded that the Local Plan will have no adverse effects on European Sites considered vulnerable in terms of air quality (page 98, PDF page 1017). The

Additional Sites IIA Addendum **(SD009)** confirms that the additional allocations do not change that conclusion (paragraph 3.29, page 9 (PDF page 127)).

Noise and light pollution

387. Noise and light pollution impacts have been assessed through the Habitats Regulations Assessment (within the Pre-Submission Integrated Impact Assessment **(SD008)**). Section 3.1 (page 16 (PDF page 936)) explains that in some matters a Local Plan can affect European sites through individual allocations or 'in combination' effects from cumulative impacts, known as effect pathways. Typical environmental changes including noise changes and introduction of light are included in Table 3-1. Appropriate assessments undertaken for these effect pathways demonstrate that the Local Plan will have no adverse effects on the integrity of any European sites (paragraph 9.2.2., page 97 (PDF page 1017)).

Education

388. The Council has worked in collaboration with Essex County Council (ECC), the lead authority for Education, to ensure sufficient education places (including Early Years and Childcare) arising from new development are provided over the Plan period. The education assessment **(INF007)** has been carried out in accordance with ECC's Developers' Guide to Infrastructure Contributions (Revised 2024) **(INF015)** and the education requirements included within this site policy under '*Supporting onsite development'*.

Health

389. The potential impact of the Local Plan on health provision is assessed through the Infrastructure Delivery Plan (IDP) **(INF012)** and updated in the Post Consultation Amendments to IDP in response to MIQs **(INF012-A)**. Section 12 of **INF012** (PDF pages 114-129) explores primary and secondary healthcare, specialist and supported housing, and ambulance services. Recommendations on the infrastructure required to support growth have been translated into the infrastructure delivery schedules at Appendix A (from PDF page 207 and as updated in **INF012-A**) and incorporated into the site policy requirements.

Recreation

390. The potential impact of the Local Plan on recreation is assessed through the Infrastructure Delivery Plan (IDP) **(INF012)**. Section 7 of **INF012** (PDF pages 62-79) explores green infrastructure, and indoor and outdoor sports facilities. Recommendations on the infrastructure required to support growth have been translated into the infrastructure delivery schedules at Appendix A (from PDF page 150) and incorporated into the site policy requirements.

Utilities

391. The likely impact of the Local Plan on utilities including water supply, sewerage, provision of energy and broadband is assessed through the Infrastructure Delivery Plan (IDP) **(INF012)**.

392. With regards to water supply, Essex and Suffolk Water recommends early engagement on planning applications so that phasing of development and connections can be agreed. This is set out in the statement of common ground **(SOCG041)** (page 6, PDF page 7)).

393. In respect of sewerage, the Water Cycle Study Addendum **(CC017)** concludes that South Woodham Ferrers WRC has no headroom at present. This site is partially located within the existing South Woodham Ferrers WRC catchment. Existing public sewers located within the site (150mm diameter). Sewer will need to be extended to accommodate the development or a sustainable point of connection identified (Table 3-5, page 36 (PDF page 36)). In addition, no objection to the site allocation has been raised by Anglian Water **(SOCG019),** however, modifications 252 and 253 are proposed in the Schedule of Modifications in response to consultation responses **(SD005)**.

394. In relation to energy, **INF012** reports that all primary substations in Chelmsford have a capacity of more than 5%, indicating that there are no electricity capacity issues in the area. There is also no network constraints identified in relation to gas supply (Section 10, page 90). In addition, no constraints have been raised by National Grid or UK Power Networks to the site allocation.

395. With regards to broadband, INF012 reports that new development should be capable of receiving gigabit speed and reliable 5G mobile and broadband connectivity. This is in line with Digital Essex superfast broadband programme and as required by Strategic Policy S9 – Infrastructure Requirements **(SD001)** (page 86 (PDF page 86)). Overall, the evidence base indicates that there are no utility constraints that would prevent the site coming forward for development.

Qy	**Are the essential site specific requirements and mitigation measures justified, and will they, along with other policies in the plan, be effective in achieving sustainable development on the site?**

CCC Response to Qy

396. It is the Council's position that the development requirements for both sites are justified. The requirements for each site are clearly set out in the main body of the policy, with supporting Reasoned Justification text to further expand on any further guidance on how these requirements should be met. These include:

Landscape impacts – design and layout site policy requirements which require the character, scale and layout to have regard and respond to the site's surrounding context.

Heritage impacts – historic and natural environment site policy requirements which require development to preserve and where appropriate enhance the setting of the listed building Rettendon Old Hall and the non-designated asset Rettendon Primary School, and protect long distance views of All Saints Church, Rettendon.

Biodiversity impacts – historic and natural environment site policy requirements which require the retention and strengthening of existing landscaping, trees and hedgerows in and on the boundary of the site, appropriate habitat mitigation and creation is provided, potential effects due to recreational pressure on nearby designated European sites are mitigated.

Highways impacts – design and layout, movement and access and site infrastructure site policy requirements which require safe and convenient pedestrian and cycle connections, development that promotes and enhances active and sustainable travel, and appropriate improvements to the local and strategic road network.

397. Strategic Policy S16 **(SD001, page 83)** seeks to ensure that the future delivery of development prioritises attractive, safe and convenient active and sustainable travel over private car reliance. New development will, through design, be required to maximise opportunities for walking and cycling having regard to the Chelmsford Local Cycling and Walking Infrastructure Plan **(T012);** promote ease of movement within sites; integrate public transport infrastructure to enhance movement between new sites, adjoining areas, and key destinations.

398. ECC, as the Highway Authority, seeks early pre-application discussion with developers and/or land promoters to agree the scope of any Transport Assessment (TA) or Transport Statement (TS) and for the applicant to understand the transportation requirements and strategy for the local area **(INF015, page 48)**. Details on the thresholds for TAs and TSs are given in Appendix B of ECC's Development Management Policies February 2011 and any subsequent updates.

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

400. The Local Plan should be read as a whole and along with the other policies in the Local Plan, the site requirements and mitigation measures will be effective in achieving sustainable development. The Local Plan is considered an appropriate strategy for meeting identified needs in a sustainable way.

Qz	**Can required capacity increases in wastewater treatment and disposal be provided to support development within the timescales set out?**

CCC Response to Qz

401. As noted, in question Qx, in respect of sewerage, the Water Cycle Study Addendum **(CC017)** concludes that South Woodham Ferrers Water Recycling Centre (WRC) has no headroom at present and the Dry Weather Flow (DWF) permit will be exceeded by 19% (759 m3/d) by 2041 due to the additional sites proposed and headroom calculated in the 2024 WCS analysis.

402. The Local Plan (SD002, para 2.179 page 55) clearly sets out that South Woodham Ferrers Water Recycling Centre (WRC) does not currently have sufficient capacity to deal with the proposed growth at Rettendon Place. Although this is not a barrier to new development growth, additional capacity will need to be provided by Anglian Water as part of their business planning process and subject to approval by the Environment Agency of any proposed increase of discharges to waterbodies which exceed current permit limits. Any increase in flows are subject to the provisions of the Water Framework Directive. Additional capacity could include improvements to the existing South Woodham Ferrers WRC and/or on-site wastewater treatment systems solutions.

403. As set out in full in response to Matter 10, Q10.12 Chapter 5 of the Chelmsford Council Water Cycle Study Stage 2 – Detailed Water Cycle Study (WCS) **(CC003, February 2024, pages 74 to 105)** contains an assessment of the capacity of the existing wastewater infrastructure (piped network and water recycling centres (WRCs) to accommodate the increase in foul flows as a result of the population increase due to the planned proposed developments within the Council's administrative area.

404. Section 5.8 of the Stage 2 WCS **(CC003, pages 91 - 104)** sets out details of the Water Recycling Centre Capacity Assessment undertaken as part of the Stage 2 Study.

405. An Addendum to the Stage 2 WCS **(CC017, October 2025)** was produced which updates the Water Recycling Centre and Sewerage Network Capacity Assessment to consider the impact of 15 potential additional site allocations. Some of these sites are contained within the South Woodham Ferrers catchment WRC. The Assessment Results are set out in Section 3.3 of the Addendum **(CC017, pages 27 to 39)**.

406. Section 3.4.2 of the Addendum Stage 2 WCS **(CC017, pages 40)** sets out AWS's comments on the updated Assessment. The key points in relation to the South Woodham WRC are summarised below:

> ***South Woodham WRC -*** *There is currently no DWF permit headroom. A growth scheme is planned for this WRC with a planned delivery by the end of Asset Management Plan 8 (AMP8), March 2030, to enable further capacity to accommodate future development. Due to no capacity for growth, AWS recommended a pre-occupancy condition to ensure that development is only occupied when there is sufficient capacity at the WRC, i.e. when the growth scheme is delivered.*
>
> *For South Woodham WRC, the Addendum Stage 2 WCS recommends that a pre-occupancy condition is required as part of the Local Plan policy and planning permissions so that no new dwellings can be connected until the AMP8 scheme has been delivered. In addition, it is recommended that new sites connecting within this catchment will need to be assessed via a pre-planning enquiry.* ***(CC017, page 40)****.*

407. In the Council's Statement of Common Ground with the EA **(SOCG018, page 8)** there is an agreed resolution that the relevant developers should discuss the timing of occupancy with AWS prior to the submission of a planning application and submit with the planning application details of those discussions including agreement to the phasing of development.

408. Completions are anticipated from this site in year 2028 onwards. It may be the case that at the time of consideration of any planning application there is still some limited headroom at the WRC which can accommodate this growth.

409. However, the site policies for this location, in combination with the requirements of Strategic Policy S4 make allowances for additional capacity to be found, which could include improvements to the existing South Woodham WRC by Anglian Water, but may also be through on-site wastewater treatment systems solutions, subject to the necessary environmental permitting processes. This allows for the site developers to put in place any on-site wastewater treatment system solutions in absence of Anglian Water's upgrades coming forward in time.

410. The Council considers that Site Policy 20 is sound. **MOD Ref 252 and 253 (SD005)** are required to the Policy and paragraph 2.179 to ensure the polices are effective.

Location 21 – Growth Site Policies 21a & b Woodham Ferrers	
Q6.3	**What is the current planning status of the site (e.g. masterplans, permissions, completions)? Have there been any changes since the Plan was submitted for examination and if so, are any modifications needed?**

CCC Response to Q6.3

411. This site is located close to Growth Site 21b. They are at advanced pre-application stage, being promoted by the same developer. For completeness, this response relates to both sites.

412. Work is underway on the creation of one planning brief for the two sites. It is anticipated that planning applications will be submitted shortly. The current planning status is set out below:

Site	**Relevant Masterplan**	**Relevant Planning Application/s**	**Housing**	**Completions on site to date**
Growth Site 21a	Site Brief	A planning application is due to be submitted late October 2026	15	0
Growth Site 21b	Site Brief	A planning application is due to be submitted late October 2026	15	0

413. There have been no changes to the sites planning status since the Plan was Submitted for Examination.

Q6.4	**For the housing sites, what is the basis for the proposed capacity?**

CCC Response to Q6.4

414. The capacity for Growth Site Policies 21a and b has been informed by design work conducted internally and early discussions with the site promoters. This is

demonstrated in the Additional Housing Site Studies **(PL018, page 11, pdf page 11)** which shows how the housing sites could be developed to suitably achieve the proposed number of homes and supporting on-site land-uses such sustainable drainage systems (SUDS) and landscaping. They also demonstrate how site access could be suitably achieved.

Q6.5	**For the sites which include non-residential uses, what is the basis for the scale and type/mix of employment and other uses proposed? Is it justified?**

CCC Response to Q6.5

415. No non-residential uses proposed on this site so question not applicable.

Q6.6	**Are the development requirements clear, and are any further safeguards or mitigation measures necessary to achieve an acceptable form of development?**

CCC Response to Q6.6

416. It is the Council's position that the development requirements for both sites are clear and consistent with the approach across the Plan. The requirements for each site are clearly set out in the main body of the policy, with supporting Reasoned Justification text to further expand on any further guidance on how these requirements should be met.

417. The Plan should be read as a whole and other policies assist in the detail of how some of these development requirements should be considered. For example, all site policies note that the infrastructure required within the site policy is in addition to the relevant requirements of Strategic Policy S9 of **SD001**, page 88 (pdf page 88) and that financial contributions will be sought in accordance with Strategic Policy S10 of **SD001**, page 93 (pdf page 93).

418. The development requirements are clear, and there are no further safeguards or mitigation measures necessary to achieve an acceptable form of development on this site.

Q6.7	**What is the expected timescale and rate of development for the housing sites and is this realistic?**

CCC Response to Q6.7

419. Both sites are small and promoted by a single developer, Birkett Hall Homes Ltd.

420. The expected timescales and rate of development for the sites are set out in the April 2026 Five Year Housing Site Schedule **(LDS012),** which covers the entire Plan period. Growth Sites 21a & b are expected to be delivered in 2027/28.

421. The Five Year Housing Land Supply Methodology (April 2026) **(LDS011)** sets out how the Council calculates its five-year housing land supply, but paragraphs 4.1 to 4.15 (page 3-5 of the pdf) set out the combination of methods used by the Council to determine the annual Housing Site Schedule, namely:
    - Regular site visits
    - Information received by Development Managements Planning Officers
    - Building Control weekly reports
    - CIL commencement monthly reports
    - Annual confirmation of delivery rates with developers
    - Monitoring completed developments.

422. The sites are not included in 5YHLS calculation as set out in para 4.4 of Housing Land Supply Methodology (May 2026) **(LDS011)**, pdf page 3. No further reduction in numbers required.

423. For these reasons the expected timescale and rate of development for the site is justified and realistic.

Q6.8	**Are any modifications to the site policy needed for soundness?**

CCC Response to Q6.8

424. There are no modifications required to the site policy for soundness.

Qaa	Is Woodham Ferrers a sustainable location for the development proposed? Does the quantum of development proposed accord with the Spatial Principles and Spatial Strategy set out in Strategic Policies S1 and S7?

CCC Response to Qaa

425. Woodham Ferrers is a Service Settlement. As such it is placed in the third tier of the Settlement Hierarchy in Policy S7 The Spatial Strategy, page 70 (pdf page 70) of **SD001**. Whilst most development have been allocated to higher tier settlements, a small proportion of development has been allocated to Service Settlements outside the Green Belt. This accords with Policy S7 and Policy S1 **(SD001, page 46, pdf page 41)**.

426. Service Settlements such as Woodham Ferrers have a primary school as well as a small range of services and facilities. More information about services and facilities in Woodham Ferrers can be found in the Councils Parish Audit **(PL002, pdf page 9)** which have been carried out to support the plan and inform the settlement hierarchy.

427. As can be seen in **PL002**, pdf page 9, Woodham Ferrers, which is located close to the town of South Woodham Ferrers, has direct and regular bus services to Chelmsford and South Woodham Ferrers.

428. The Council considers that Growth Site Policies 21a and b are sound.

Qbb	**What is the likely impact of the proposed allocation on infrastructure including education, health, utilities and local transport?**

CCC Response to Qbb

<u>Transport</u>

429. Transport evidence base modelling (Transport Impact Appraisal of Local Plan Review Pre-Submission, T006-A and Additional Sites (Regulation 19) Highways Impact Junction Modelling Appraisal T007) undertaken for the latter stages of Plan development considers the cumulative impact of development and mitigation on the strategic road network across the City of Chelmsford. This is aligned with guidance on 'Transport evidence bases in plan making and decision taking', published by MHCLG. (https://www.gov.uk/guidance/transport-evidence-bases-in-plan-making-and-decision-taking)

430. An appraisal of the highway impact of Local Plan Review additional sites to the south of Chelmsford is documented in evidence base report **T007**. The 'Summary of

Findings and Conclusions' on page 40 (pdf page 40) **(T007)** suggests that the addition of trips from these sites to the road network will lead to the displacement of background traffic flows, potentially causing a small quantum of 'rat-running' through West Hanningfield, but resulting in little overall change to the forecast modelled capacity of A12 Junction 17 at Howe Green.

431. Whilst the transport evidence base does not assess the specific impact of the proposed allocation or identify site-specific mitigation for smaller sites, the quantum of trip generation at Growth Sites 21a & b is expected to have a low impact on the road network at a strategic level. The local road network will be expected to be assessed in more detail by site promoters as part of a planning application. Measures to mitigate highway impact at a local level will then need to be agreed with Essex County Council as the highway authority (and National Highways, where relevant).

Education

432. The Council has worked in collaboration with Essex County Council (ECC), the lead authority for Education, to ensure sufficient education places (including Early Years and Childcare) arising from new development are provided over the Plan period. The education assessment **(INF007)** has been carried out in accordance with ECC's Developers' Guide to Infrastructure Contributions (Revised 2024) **(INF015)** and the education requirements included within this site policy under '*Supporting onsite development'*.

Health

433. The potential impact of the Local Plan on health provision is assessed through the Infrastructure Delivery Plan (IDP) **(INF012)** and updated in the Post Consultation Amendments to IDP in response to MIQs **(INF012-A)**. Section 12 of **INF012** (PDF pages 114-129) explores primary and secondary healthcare, specialist and supported housing, and ambulance services. Recommendations on the infrastructure required to support growth have been translated into the infrastructure delivery schedules at Appendix A (from PDF page 207 and as updated in **INF012-A**) and incorporated into the site policy requirements.

Recreation

434. The potential impact of the Local Plan on recreation is assessed through the Infrastructure Delivery Plan (IDP) **(INF012).** Section 7 of **INF012** (pdf pages 62-79) explores green infrastructure, and indoor and outdoor sports facilities. Recommendations on the infrastructure required to support growth have been translated into the infrastructure delivery schedules at Appendix A (from pdf page 150) and incorporated into the site policy requirements.

Utilities

435. The likely impact of the Plan on utilities including water supply, sewerage, provision of energy and broadband is assessed through the Infrastructure Delivery Plan (IDP) **(INF012)**. This evidence base report does not identify any utility capacity constraints that would hinder delivery of the proposed site allocation.

436. With regards to water supply, Essex and Suffolk Water recommends early engagement on planning applications so that phasing of development and connections can be agreed. This is set out in the statement of common ground **(SOCG041, page 6, pdf page 7)**.

437. No objection to the site allocation has been raised by Essex & Suffolk Water, see their Statement of Common Ground **SOCG041**. In **SOCG41**, page 5 (pdf page 6) Essex & Suffolk Water state that they have brought forward investment in the treated water distribution network to meet the increased forecasted demand.

438. In respect of sewerage, the Water Cycle Study Addendum **(CC017)** concludes that South Woodham Ferrers WRC has no headroom at present. This site is located within the existing South Woodham Ferrers WRC catchment. Existing public sewers located adjacent to the site (150mm diameter). Sewer will need to be extended to accommodate the development or a sustainable point of connection identified (Table 3-5, page 36 (PDF page 36)). In addition, no objection to the site allocation has been raised by Anglian Water **(SOCG019)**.

439. In relation to energy, **INF012** reports that all primary substations in Chelmsford have a capacity of more than 5%, indicating that there are no electricity capacity issues in the area (Section 10.3, pdf page 98). There is also no network constraints identified in relation to gas supply (Section 10.2, pdf page 96). In addition, no constraints have been raised by National Grid or UK Power Networks to the site allocation.

440. With regards to broadband, **INF012** reports that new development should be capable of receiving gigabit speed and reliable 5G mobile and broadband connectivity. This is in line with Digital Essex superfast broadband programme and as required by Strategic Policy S9 – Infrastructure Requirements **(SD001, page 86, pdf page 86)**. Overall, the evidence base indicates that there are no utility constraints that would prevent the site coming forward for development.

441. The Council considers that Growth Site Policies 21a and b are sound.

Qcc	Are the essential site specific requirements and mitigation measures justified, and will they, along with other policies in the plan, be effective in achieving sustainable development on the site?

CCC Response to Qcc

442. It is the Council's position that the development requirements for both sites are justified. The requirements for each site are clearly set out in the main body of the policy, with supporting Reasoned Justification text to further expand on any further guidance on how these requirements should be met. These include:

Landscape impacts – design and layout site policy requirements which require the character, scale and layout to have regard and respond to the site's surrounding context, and to create a frontage onto Main Road.

Heritage impacts – historic and natural environment site policy requirements which require the setting of Ford End Primary School to be preserved.

Biodiversity impacts – historic and natural environment site policy requirements which require existing trees and hedgerows in and on the boundary of the site to be retained and enhanced, and the development to mitigate any potential effects due to recreational pressure on nearby designated European sites.

Highways impacts – design and layout, movement and access and site infrastructure site policy requirements which require safe and convenient pedestrian and cycle connections, and provide appropriate improvements, as necessary to the local and strategic
road network

443. Strategic Policy S16 of the Pre-Submission (Regulation 19) Local Plan Consultation Document **(SD001, page 83, pdf page 83)** seeks to ensure that the future delivery of development prioritises attractive, safe and convenient active and sustainable travel over private car reliance. New development will, through design, be required to maximise opportunities for walking and cycling having regard to the Chelmsford Local Cycling and Walking Infrastructure Plan **(T012)**; promote ease of movement within sites; integrate public transport infrastructure to enhance movement between new sites, adjoining areas, and key destinations.

444. Essex County Council, as the Highway Authority, seeks early pre-application discussion with developers and/or land promoters to agree the scope of any Transport Assessment (TA) or Transport Statement (TS) and for the applicant to understand the transportation requirements and strategy for the local area **(INF015, page 48**). Details on the thresholds for TAs and TSs are given in Appendix B of ECC's Development Management Policies February 2011 and any subsequent updates.

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

446. The Local Plan should be read as a whole and along with the other policies in the Local Plan, the site requirements and mitigation measures will be effective in achieving sustainable development. The Local Plan is considered an appropriate strategy for meeting identified needs in a sustainable way.

Qdd	**Can required capacity increases in wastewater treatment and disposal be provided to support development within the timescales set out?**

CCC Response to Q21dd

447. As set out As set out in full in response to Matter 10, Q10.12, Chapter 5 of the Chelmsford Council Water Cycle Study Stage 2 – Detailed Water Cycle Study (WCS) **(CC003, February 2024, pages 74-105, pdf pages 74-105)** contains an assessment of the capacity of the existing wastewater infrastructure (piped network and water recycling centres (WRCs)) to accommodate the increase in foul flows as a result of the population increase due to the planned proposed developments within the Council's administrative area.

448. Section 5.8 of the Stage 2 WCS **(CC003, pages 91 – 104, pdf pages 91-104)** sets out details of the Water Recycling Centre Capacity Assessment undertaken as part of the Stage 2 Study.

449. An Addendum to **CC003**, Chelmsford Water Cycle Study Detailed Water Cycle Study Addendum **(CC017)** was produced in October 2025. It updates the Water Recycling Centre and Sewerage Network Capacity Assessment to consider the impact of 15 potential additional site allocations. Some of these sites are contained within the South Woodham Ferrers catchment WRC. The Assessment Results are set out in Section 3.3 of the Addendum **(CC017, pages 27-39, pdf pages 27-39)**.

450. Section 3.4.2 of the Addendum Stage 2 WCS **(CC017, page 40, pdf page 40)** sets out Anglian Water Service's comments on the updated Assessment. The key points in relation to the South Woodham WRC are summarised below:

South Woodham WRC - *There is currently no DWF permit headroom. A growth scheme is planned for this WRC with a planned delivery by the end of Asset Management Plan 8 (AMP8), March 2030, to enable further capacity to accommodate future development. Due to no capacity for growth, AWS recommended a pre-occupancy condition to ensure that development is only occupied when there is sufficient capacity at the WRC, i.e. when the growth scheme is delivered.*

For South Woodham WRC, the Addendum Stage 2 WCS recommends that a pre-occupancy condition is required as part of the Local Plan policy and planning permissions so that no new dwellings can be connected until the AMP8 scheme has been delivered. In addition, it is recommended that new sites connecting within this catchment will need to be assessed via a pre-planning enquiry **(CC017, page 40, pdf page 40)**.

451. However, following on from the comments from Anglian Water in **CC017**, the Council's Statement of Common Ground with the Environment Agency **(SOCG018, page 8, pdf page 9)** reaches an agreed resolution, that the relevant developers should discuss the timing of occupancy with AWS prior to the submission of a planning application and submit with the planning application details of those discussions including agreement to the phasing of development. Similarly, this position is agreed in the Statement of Common Ground with Anglian Water (**SOCG019, page 12**). All relevant parties are therefore in agreement that there is no need for pre-occupancy conditions to be required for sites in Location 21 due to the policy support provided by Strategic Policy S4 and Strategic Policy S10 **(SD001, pages 61 and 93, pdf pages 61 and 93)**.

452. Completions are anticipated on these sites in 2027/2028 and planning anticipations are expected by the end of October 2026. Given the small size of these sites (15 dwellings per site) it may be the case that at the time of consideration of the planning applications, there is some limited headroom at the WRC which can accommodate this growth. Whether headroom is available will depend on the actual flows, existing commitments and permit position at the relevant time. The response should instead say this will need confirmation from AWS through its development-planning/pre-planning process.

453. Anglian Water will be consulted and respond on individual planning applications. These responses will represent a point-in-time assessment of available DWF headroom taking account of relevant committed development, whereas the WCS considers the cumulative implications of planned Local Plan growth over the plan period, based on the average DWF. It is therefore appropriate to consider the full implications of these sites through their relevant planning applications and through the application of Policy S4 which, subject to the suggested modifications set out in Matter 10 (Q10.12), make allowances for additional capacity to be found if required.

454. Therefore, the site policies for this location, in combination with the requirements of Strategic Policy S4 make allowances for additional capacity to be found, which could include improvements to the existing Great Leighs WRC by Anglian Water, but may

also be through on-site wastewater treatment systems solutions, subject to the necessary environmental permitting processes. This allows for the site developers to put in place any on-site wastewater treatment system solutions in absence of Anglian Water's upgrades coming forward in time.

455. The Council considers that Growth Site Policies 21a and b are sound.

EVIDENCE BASE LIST FOR MATTER 6	
SD001	Pre-Submission (Regulation 19) Local Plan Consultation Document
SD002	Focused Consultation Additional Sites (Regulation 19) Document November 2025
SD005	Schedule of Proposed Modifications (June 2026)
SD008	Pre-Submission Integrated Impact Assessment January 2026
SD009	Additional Sites Integrated Impact Assessment
CC001	Strategic Flood Risk Assessment 2024 (Level 1)
CC003	Water Cycle Study, stage 2 Detailed Study 2024
CC010	Level 2 Strategic Flood Risk Assessment May 2024
CC011	Sequential end Exception Tests Completed December 2017
CC012	Sequential and Exception Tests of Preferred Options Site Allocations (May 2024)
CC014	Air Quality Impact Assessment December 2024
CC016	Review of the Air Quality Impact Assessment following proposed changes to the Local Plan, September 2025
CC017	Additional Sites – Chelmsford Council Detailed Water Cycle Study Addendum October 2025
CC019	Additional Sequential and Exception Test October 2025
CC021	Updated Sequential and Exception Tests May 2026
AH003	Chelmsford Gypsy and Traveller Accommodation Assessment (GTAA) 2024
CC029	Level 1 and Level 2 Strategic Flood Risk Assessment 2017 (EB106A)
PL051 (EB108A)	Heritage Assessments Technical Note March 2017 (EB 108A)
ECON001	Retail Capacity Study Update
ECON002	Chelmsford City Council Employment Land Review 2023
ECON003	Chelmsford City Council Employment Land Review Focused Update (Dec 2024)
IIA005	Integrated Impact Assessment Preferred Options (March 2024)
INF007	Additional Sites - Chelmsford City Council Housing Scenario Test - Early Years and Childcare (September 2025)
INF008	Additional Sites - Chelmsford City Council Housing Scenario Test - Primary and Secondary Education (September 2025)
INF012	Chelmsford City Council Infrastructure Delivery Plan
INF012-A	Post Consultation Amendments to IDP in response to MIQs
INF015	ECC Developers' Guide 2024
LDS011	Five Year Housing Land Supply Methodology (April 2026)
LDS012	Five Year Housing Site Schedule (April 2026)
LDS013	Five Year Land Supply Position Statement (April 2016)
PL002	Parish Audit March 2024
PL004-A	Landscape Sensitivity and Capacity Assessment March 2017

PL004-C	Annex to the Landscape Sensitivity & Capacity Evidence Base Report on Land at South Woodham Ferrers May 2018
PL004-E	Landscape Sensitivity and Capacity Study (Preferred Options New Sites) 2024
PL006	Heritage Assessments for Rural Sites 2024
PL007	Heritage Assessment for Hammonds Farm 2024
PL008	Heritage Assessment for Employment Sites 2024
PL014	Additional Sites Heritage Assessments
PL013	Additional Sites - Landscape Sensitivity and Capacity Study October 2025
PL018	Additional Housing Site Studies October 2025
PL048	South Woodham Ferrers Masterplan January 2021
T006-A	Transport Impact Appraisal of Local Plan Review Pre-Submission (December 2024) (July 2025 Update)
T007	Additional Sites (Regulation 19) Highways Impact Junction Modelling Appraisal, October 2025
T012	Chelmsford Local Cycling and Walking Infrastructure Plan September 2024
TP009	Submission Topic Paper Housing (May 2026)
TP010	Submission Topic Paper Spatial Strategy and Strategic Sites (May 2026)
SOCG008	Statement of Common Ground with Historic England February 2026
SOCG16	Statement of Common Ground with Gladman Developments Ltd March 2026
SOCG017	Statement of Common Ground with Croudace Homes
SOCG018	Statement of Common Ground with the Environment Agency March 2026
SOCG019	Statement of Common Ground with Anglian Water March 2026
SOCG022	Statement of Common Ground with Mr Eugene Kinsella March 2026
SOCG033-A	Statement of Common Ground with National Highways – Update October 2026
SOCG036	Statement of Common Ground with the Ministry of Defence April 2026
SOCG041	Statement of Common Ground with Essex & Suffolk Water April 2026
SOCG043	Statement of Common Ground with Welbeck Strategic Land V Limited (May 2026)
SOCG046	Statement of Common Ground with Wates Developments (May 2026)
SOCG049	Statement of Common Ground with Wates Developments - Infrastructure
SOCG049A	Statement of Common Ground with Wates Developments (Infrastructure) – Update October 2026

SOCG050	Statement of Common Ground with Wates Developments - Masterplan
V003	Chelmsford Local Plan Viability Update (April 2026)
OSP015	Adopted Chelmsford Local Plan May 2020



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Document published by
Spatial Planning Services
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