HS006-1 Matter 6

Chelmsford Local Plan

Examination Hearing Statement – Site Selection and Growth Area 1

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 – SITE SELECTION	
	Site assessment and selection
Q6.1	**What was the Council's approach to site assessment and selection? What was the process and what factors were taken into account? What evidence is the Council relying on?**

CCC Response to Q6.1

4. It is the Council's position that the approach to site selection and assessment followed the approach described in the Spatial Strategy and Strategic Sites Submission Topic Paper **(TP010)** and accords with national policy and guidance.

5. The Council undertook a range of assessment work and plan-making considerations to inform the selection of potential sites, preferred sites and reasonable alternatives. This was an iterative process involving a range of activities undertaken to inform site allocations within both Regulation 19 Local Plans **(SD001 and SD002)**.

National Policy and Guidance

6. The process began by considering relevant requirements of national planning policy and guidance. These include National Planning Policy Framework (NPPF23) policies to:

- Ensure that the Plan makes sufficient provision for housing, employment and infrastructure through its strategic policies (Paragraph 20)
- Identify a sufficient supply and mix of housing sites including deliverable and developable sites (Paragraph 69)
- Promote a good mix of site including small and medium sized housing sites and larger scale development when planning for a large number of new homes (Paragraphs 70-74)
- Assess development sites for allocation in Plans (Paragraphs 114-115).

7. And Planning Practice Guidance (PPG) guidance related to assessing housing and economic land availability (from Paragraph: 001 Reference ID: 3-001-20190722), Plan-making (from Paragraph: 001 Reference ID: 61-001-20190315) and Strategic environmental assessment and sustainability appraisal (from Paragraph: 001 Reference ID: 11-001-20190722).

Site Suitability, Availability, Achievability and Capacity

8. In line with national planning policy and guidance, the Council first used its Call for Sites and Strategic Housing and Employment Land Availability Assessment (SHELAA) to identify site and land that might be suitable, available and achievable for housing, employment or other development, and the potential development capacity of promoted land. However, in line with national planning policy and guidance it did not identify sites for allocation. The SHELAA has been updated regularly throughout the plan-making process to align with consultation events.

9. The Council also identified other potential sources of land supply including:

- Allocated sites in the Adopted Local Plan yet to be completed to identify potential 'roll over' sites.
- Unimplemented sites with planning permission.
- Surplus land in the Council's ownership, and
- Site regeneration opportunities.

10. Officers then used site histories, promoter and stakeholder representations, evidence base documents and professional judgement to assess site opportunities and constraints.

11. Planning Briefs/Concept Frameworks **(PL047)** were prepared for small sites identified in the Pre-Submission plan **(SD001)**. These provide information on site constraints and opportunities, potential capacity and potential site access. Detailed site-specific studies were also undertaken for the additional sites **(SD002)** in the Additional Sites – Housing Site Studies October 2025 **(PL018).** This considers a range of site-specific matters including potential site access, topography, neighbouring land uses and other physical constraints and relevant planning history. Both evidence base documents demonstrate that the allocated sites are suitable and achievable.

12. In addition, site deliverability and contribution towards the Housing Trajectory and Five Year Housing Land Supply informed the site selection process. The Council prepared housing trajectory and housing land supply evidence during the plan preparation to ensure that site allocations are capable of providing a reliable supply of deliverable and developable housing in line with national policy requirements. This included Housing Trajectory and Housing Site Schedule **(latest version LDS012)** and Five Year Housing Land Supply Methodology evidence **(latest version LDS024)**. The Council also used Windfall Assessment evidence **(latest version LDS015)** to support the windfall contribution in the Spatial Strategy and to inform the level of site

allocations required to meet the housing requirement in Strategic Policy S6 - Housing and Employment Requirements **(SD002, page 60)**.

13. As part of the site selection process, land not promoted for development by a developer or landowner was excluded as it cannot be considered available within the plan period.

Sustainability

14. In accordance with Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) requirements, potential sites including all sites submitted through the SHELAA were assessed through the Integrated Impact Assessment (IIA). This used a consistent methodology of assessment against the 14 IIA framework objectives and was an iterative process undertaken throughout the plan preparation process to help inform the selection of the preferred sites, reasonable alternatives and rejected sites. Whilst there is some cross-over between the IIA framework and the criteria used for the SHELAA site assessment, it should be noted that the two assessments were carried out for different purposes. Preferred sites in the Regulation 19 Plans **(SD001 and SD002)** were informed by the findings of the IIA. More detail of the assessment is available in Appendix M of the Pre-Submission IIA **(SD008)** (pages 790-895 (PDF page 802-907)).

15. Site identification was also undertaken in accordance with the Spatial Principles and Spatial Strategy. This included identifying potential sites early in the site selection process within the top three-tiers of the Settlement Hierarchy and outside of the Green Belt or Green Wedge. Consequently, promoted sites that were inconsistent with the Spatial Principles and Spatial Strategy were discounted and not considered as reasonable alternatives. This included sites in Small Settlements as they are the least sustainable and accessible locations in the Settlement Hierarchy and sites within the Green Belt or Green Wedge as the evidence base demonstrates that sufficient suitable, available and achievable land exists outside of these designations to meet identified development requirements. As a result, exceptional circumstances did not exist for releasing Green Belt land in line with paragraph 145 of the NPPF23. Development within the Green Wedge was also rejected as it would conflict with the objectives of the Green Wedge in preventing urban sprawl and settlement coalescence when other suitable sites and land are available for development.

16. The Council also recognised the benefit of using suitable urban brownfield land, although very few of the sites submitted in the relevant calls for sites were for redevelopment of brownfield sites in the urban area. Site selection was also informed through a review of adopted Local Plan allocated sites and SHELAA promoted sites as described in the technical note on Housing Capacity in Chelmsford City Centre and Urban Area **(AH002)**.

Technical Evidence Base

17. Detailed assessment of sites was undertaken to inform the suitability, infrastructure capacity and relevant site policy mitigation measures including in relation to highways, archaeology, viability, infrastructure, flood risk, education, wastewater, heritage, and landscape sensitivity and capacity. These demonstrate that the allocated sites are suitable and achievable. These reports are available in the evidence base.

Engagement and Consultation

18. Engagement was undertaken with key stakeholders including statutory bodies, infrastructure providers and site promoters/developers throughout the plan preparation process to inform the site selection process and to better understand the suitability, achievability and availability of potential sites including site constraints and delivery timescales. Engagement was also had on the Infrastructure Delivery Plan to identify infrastructure requirements, delivery mechanisms, funding opportunities and to identify any constraints and/or mitigation requirements with regards to sites. This work demonstrates that the allocated sites are suitable and achievable. Statements of Common Ground and the Statement of Cooperation **(SD004)** provide more detail on stakeholder engagement activities. Consultation responses from the Regulation 18 and 19 stages were also used to inform the selection of sites (Regulation 22 Consultation Statement, **(SD003).**

19. The Council considers that the plan's site assessment and selection process is justified and consistent with national policy. It is informed by a proportionate and robust site selection process, assessment of promoted sites and reasonable alternatives in the IIA, Housing Site Schedule and Windfall Assessment evidence, a wide range of available technical evidence and engagement with key stakeholders including site promoters and infrastructure providers.

Issue 1	**Site allocations**
Q6.2	**Is the approach of requiring masterplans/planning briefs an effective mechanism to secure sustainable development across the plan area?**

CCC Response to Q6.2

20. It is the Council's position that the approach of requiring masterplans/planning briefs is an effective mechanism to secure sustainable development across the plan area.

21. The Council uses masterplans/planning briefs as a development management tool to ensure allocated sites are planned comprehensively and deliver well-designed, high quality, sustainable developments in accordance with site specific policies and the wider spatial strategy of the Local Plan. They are used to provide more detail on how

a site will be delivered prior to the submission of planning applications including the vision for the new place, site density and character, site movement strategy and key development design principles. In doing so masterplans/planning briefs play a key role in delivering sustainable development. They also increase certainty for developers and stakeholders, facilitate early engagement with key stakeholders including statutory bodies and service providers, and support the timely delivery of high-quality development while maintaining the Council's commitment to sustainable growth and effective placemaking. In addition, masterplans/planning briefs provide residents and local communities with an opportunity to engage with and shape development proposals at an early stage before planning applications are submitted.

22. The use of masterplans is recognised in National Planning Policy Framework 2023 for helping to guide the development of larger-scale proposals (Paragraph 74). They are supported in Planning Practice Guidance (PPG) which identifies their use in clarifying design expectations early in the planning process, setting a clear vision for the site, informing infrastructure and viability assessments and identifying requirements for developer contributions or other investment (Paragraph: 007 Reference ID: 26-007-20191001). As such, the requirement for masterplans/planning briefs as set out in the Local Plan are consistent with national policy and guidance.

23. The preparation and approval of masterplans is a long-established means of securing high quality development in Chelmsford. The Adopted Chelmsford Local Plan **(OSP015)** requires the production of masterplans for all the Strategic Site allocations within the Plan. The Council also has a Masterplan and Development Framework Procedure **(PL033-A)** which it has operated since 2019. The Procedure has been reviewed over time, most recently in October 2026 to reflect experience gained from implementing the procedure and to ensure that it remains effective, proportionate and aligned with the submitted Local Plan and current working practices. Approved masterplans will be a material consideration alongside the Local Plan to ensure that Strategic Growth Sites and Growth Sites deliver the Spatial Strategy and site allocation policies.

24. Some allocated sites have existing approved masterplans/design briefs. As set out in in Strategic Policy S15 – Creating Successful Places **(SD001, paragraph 5.28, page 58)**, the Council will review and consider whether these remain relevant and/or up-to-date to determine whether further masterplanning is required and whether the approved masterplan/planning brief process can be adapted to take account of them.

25. The Council considers that masterplans/planning briefs provide an effective mechanism for ensuring that all new major development is planned comprehensively and secures well-designed, high quality, sustainable developments.

Growth Area 1 – Central and Urban Chelmsford	
Location 1 - Strategic Growth Site Policy 1a – Chelmer Waterside (sites CW1a and CW1c - CW1f)	
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

26. This location comprises five sites. 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
CW1a Former Gas Works	Chelmer Waterside Development Framework approved October 2021 **(PL020)**	Enabling works: 22/00239/FUL - relocation of gas pressure reduction station (work complete); 21/00024/FUL – new road bridge (opened July 2025)	450	0
CW1c Lockside	As above	As above	130	0
CW1d Baddow Road Car Park/land to the East	As above	As above	190	0
CW1e Travis Perkins	As above	As above	75	0
CW1f Navigation Road Sites	As above	As above	35	0

27. No changes have been made since the Local Plan was submitted.

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

CCC Response to Q6.4

28. The capacity for the sites within Strategic Growth Site Policy 1a has been informed by site appraisals conducted internally, and early discussions with land promoters. This background work fed into the Chelmer Waterside Development Framework **(PL020)** which sets out opportunities and constraints for the area and includes a conceptual masterplan (page 22 (PDF page 25)) to show how development can be accommodated. It also takes account of public spaces, sustainable movement, layout and setting, creating a framework which supports the capacity being proposed.

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

29. Site CW1c is required to provide a new 56 place stand-alone early years and childcare nursery (Use Class E(f) on 0.13 hectares of suitable land. This has been carried forward from the Adopted Local Plan 2020 **(OSP015).**

30. 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)**. The early years/childcare provision requirement for Site CW1c is considered to form part of the capacity needed to accommodate demand from growth in the Chelmsford Urban Area (Growth Area 1, pdf page 5).

31. 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). This has not changed since the 2020 allocation.

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.

32. The policy requirement for supporting commercial uses does not specify the size of employment uses, which will depend on demand at the time of detailed site planning. Similarly, the mix/type of uses will need to respond to the market, but commercial and community uses will be expected to serve the new neighbourhood and create high-quality waterside areas. Similarly, the requirement for access to the waterways and premises for water-based clubs gives flexibility for bespoke measures to be designed and incorporated at planning stage. The Chelmer Waterside Development Framework **(PL020)** sets out more detail in the conceptual masterplan (page 22, PDF page 25)). The Council will take a flexible approach to uses on these sites which support positive activity and encourage innovation and investment, in accordance with Strategic Policy S17 **(SD001)** (page 99 (PDF page 99)).

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

33. It is the Council's position that the development requirements for the sites making up Strategic Growth Site 1a 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.

34. 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)).

35. No further safeguards or mitigation measures are required.

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

CCC Response to Q6.7

36. 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. The sites making up Strategic Growth Site 1a are expected to be delivered from 2029/30 onwards, and are included in **LDS012** on page 7 (PDF page 7).

37. 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.

38. The sites now benefit from the delivery of extensive enabling works including relocation of a gas pressure reduction station from within the CW1a site, and a new road bridge with foot/cycle connection across the River Chelmer which opens up access to all these sites to enable regeneration of this area.

39. The timescale for delivery of the enabling works has been difficult to predict accurately, but the Housing Site Schedule reflects a timescale and rate of housing development which takes that into consideration, and is considered to be realistic.

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

CCC Response to Q6.8

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

Q1a	**How will the Council ensure a comprehensive approach to site and infrastructure delivery across the Chelmer Waterside sites?**

CCC Response to Q1a

41. The sites making up SGS1a are grouped together as they provide an opportunity to make a significant contribution to the overall regeneration of this part of the City Centre. One site originally included in this wider allocation (now removed from the policy) has delivered 427 homes.

42. A comprehensive approach will be achieved firstly by having regard to the Chelmer Waterside Development Framework **(PL020)** when planning proposals are brought forward. It illustrates the development parameters and the wider scope of on-site

planning requirements including recommendations and guidance on how these requirements can be met.

43. These requirements are translated into the site policy for the wider site and the individual parcels within it. The Council's Infrastructure Delivery Plan **(INF012** and as updated in **INF012-A)** then sets out these requirements for each site including contributions for administrative area-wide contributions, and then specific requirements for infrastructure including education, highways, and tree-planting. Development on these sites will collectively contribute towards the new access road and bridge linking north-south from Wharf Road to Parkway, creating much improved access to this wider area.

Q1b	**What is the justification for a new stand alone early years and childcare nursery on site CW1c? How will a suitable site be identified, and how will the facility be funded and delivered?**

CCC Response to Q1b

44. Site CW1c is required to provide a new 56 place stand-alone early years and childcare nursery (Use Class E(f) on 0.13 hectares of suitable land. This has been carried forward from the Adopted Local Plan 2020. Further detail is set out in the response to Q6.5 for this site.

Q1c	**Are requirements for flood risk management and mitigation clearly set out in the policy and supporting text?**

CCC Response to Q1c

45. It is the Council's position that requirements for flood risk management and mitigation have been clearly set out in Strategic Growth Site Policy 1a **(SD001, page 112, pdf page 112-115)** and the accompanying Reasoned Justification.

46. The opening paragraph of the policy references the Chelmer Waterside Development Framework 2021 **(PL020)** and under the heading Historic and Natural Environment there is a requirement for adequate flood risk management and sustainable urban drainage techniques.

47. This is augmented in the Reasoned Justification to Policy 1a at paragraph 7.13 **(SD001, page 113, pdf page 113)** which again refers to **PL020**. This is an overarching document to guide the delivery of a new residential-led neighbourhood within the city. Flood risk management, including mitigation is looked at in a holistic manner across the entire allocation. This issue is dealt with in two dedicated sections on Flooding **(PL012, pages 11 and 14, pdf pages 11 and 14)**. This would include

flood storage and compensation, avoiding all but water compatible uses in Flood Zone 3b and making space for natural sustainable drainage solutions. Specific mitigation techniques are listed including building design for flood resilience and safe means of escape.

48. Strategic Growth Site Policy 1a demonstrates clear compliance with national policy and evidence as it would ensure that development takes a sequential, risk approach to development, take account of all sources of flood risk, that flooding is not made worse elsewhere, and the development is safe now and into the future.

Q1d	**Is it clear what is meant by 'abundant' street and tree planting? How does this relate to the requirements in policy DM17?**

CCC Response to Q1d

49. The requirement for abundant street and tree planting is included to ensure new urban development contributes to the riparian setting of these sites and introduces new greening within the layout and landscaping. The requirement is intended to meet the criteria of Policy DM17, where three new trees are required to be planted per new home and a significant number of new trees for employment and infrastructure sites. Given the mixed-use nature of these sites, the amount of tree planting is expected to exceed the three new trees target.

50. Paragraph 8.161 of the Local Plan **(SD001, Pages 277 to 278)** explains that "A judgement will be made on a case-by-case basis over what will be considered 'significant' taking into account the nature, scale and size of the development, the site and immediate locality with more guidance to be set out in the Making Places SPD". It is noted that the Council now intends to incorporate the Making Places SPD, 2021 into a 'Making Places Implementation Guide', which will include the relevant additional guidance.

51. However, the Council proposes the following modification to this wording for clarity and consistency.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
NEW	112			*Amend 5th bullet under Design and layout:* • Layout to incorporate ~~abundant~~ significant street and tree planting and other multifunctional green infrastructure to include natural flood risk and surface water management measures	For clarity and consistency

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

52. The current planning status for Strategic Growth Site Policy 1w (SGS1w) is set out below:

Site	**Relevant Masterplan**	**Relevant Planning Application/s**	**Housing numbers**	**Completions on site to date**
SGS1w		Planning applications 24/01046/FUL and 24/01046/OUT withdrawn on 8 December 2025	350	0

53. 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

54. The capacity for site SGS1w has been informed by site appraisals conducted internally, and discussions with land promoters. Officers worked with land promoters and the allocation capacity reflected those discussions, resulting in the capacity reflected in the planning applications.

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

55. The policy requirement for supporting commercial uses does not specify the size of employment uses, which will depend on demand at the time of detailed site planning. Similarly, the mix/type of uses will need to respond to the market, but commercial and community uses will be expected to serve the new neighbourhood and create high-quality waterside areas. Flexibility to enable innovation and investment will be encouraged and incorporated at planning stage.

56. The policy also includes a requirement for financial contributions or onsite provision of other community facilities, including healthcare provision. Within Growth Area 1 there is a deficit of primary care capacity, and there is likely to be a requirement for a new build facility as set out in the Infrastructure Delivery Plan **(INF012,** (PDF page 120) and as updated in **INF012-A,** Location 1). The Council is committed to help facilitate discussions once details of the type and location of a healthcare facility required is known.

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

57. It is the Council's position that the development requirements for Strategic Growth Site 1w are clear and consistent with the approach across the Local Plan. The requirements for the 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.

58. 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)).

59. No further safeguards or mitigation measures are required.

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

CCC Response to Q6.7

60. 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. SGS1w is expected to be delivered from 2037 onwards, and is included in **LDS012** on page 8 (PDF page 8).

61. 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.

62. The Council proposes the following modification to the Reasoned Justification for SGS1w 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
96	117		Strategic Growth Site Policy 1w, paragraph 7.28	*Amend paragraph:* The Meadows Shopping Centre and associated Meadows Surface Car Park provide an opportunity to regenerate and diversify the site, as shown on the Policies Map, to provide around ~~757~~350 new homes and reconfigured City Centre offer between 202~~9~~37 and 203~~5~~41	To reflect the April Housing Site Schedule

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

CCC Response to Q6.8

63. The Council proposes a modification to the policy to reflect the recued capacity for the site. 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
94	115		Strategic Growth Site Policy 1w	*Amend first sentence in first bullet point under Amount and type of development:* • Around ~~757~~350 new homes of a mixed size and type including affordable housing and specialist residential accommodation.	To reflect the April Housing Site Schedule

Q1e	**Why does the April 2026 Housing Site Schedule show a significantly reduced capacity for this site, and should this be reflected in the policy?**

CCC Response to Q1e

64. The April 2026 Housing Site Schedule **(LDS012)** shows a reduction in capacity for the site from 757 to 350 dwellings. Since being proposed for allocation and the planning applications being received, the site has changed ownership and the planning applications were withdrawn.

65. 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. Site SGS1w is expected to be delivered from 2037 onwards, and is included in **LDS012** on page 8 (PDF page 8).

66. 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.

Q1f	**Is there evidence that the site is available and capable of being delivered within the plan period?**

CCC Response to Q1e

67. Council officers have been in close discussion with the current centre operators who are still signalling their intent to redevelop the site whilst maintaining an operational centre in the meantime. The expectation remains that the centre will be comprehensively redeveloped within the plan period.

Q1g	**Is development of SGS1w dependent on capacity being available at other city centre car parks? Has that been assessed? If alternative parking is not available, how would that impact on side delivery in the timeframes and capacity envisaged?**

CCC Response to Q1e

68. In relation to parking capacity, whilst customer and staff parking provision to serve the city centre is a material consideration, the Council has identified that the Meadows surface car park could be removed as part of a move towards more sustainable patterns of travel in and out of the city centre. This is in combination with existing and improving Park and Ride and local bus services, and in combination with the Meadows and Waterside developments improving foot and cycle routes into and out of the city to the east. There is also some capacity within the range of public parking facilities currently operating in the city centre.

69. Based on the decision already taken to release the car park, there is no ongoing requirement to assess the availability of alternative public car parking beyond a requirement for the site promotor/developer to work with the Local Highway Authority and Local Planning Authority on essential infrastructure provision as part of the development.

70. The principle of reduced parking provision in highly connected areas is supported by the Essex Parking Guidance **(PL016)** (paragraph 2.5, page 12 (PDF page 16)), which says that developments should aim to reduce parking provision over time. The policy for SGS1w also includes provision of a mobility hub, travel plans and parking controls to support the reduction in parking.

Q1h	**What is the justification for the three replacement bridges required by the policy, and can they be viably provided as part of the development?**

CCC Response to Q1e

71. In relation to the policy inclusion of replacement bridges, this relates to a requirement to contribute towards improved bridges in the wider Chelmer Waterside area, and it is not intended that they should solely be provided by this site. The Council proposes a modification to reflect this (see below).

72. One of the three bridges has recently been completed and opened. Sites in this regeneration area now benefit from the delivery of extensive enabling works including this new road bridge with foot/cycle connection across the River Chelmer which opens up access to the sites in SGS1a and this site SGS1w.

73. The Council's Infrastructure Delivery Plan **(INF012** and as updated in **INF012-A)** sets out the further requirements for the site including financial contributions which are attributed more broadly across this area. Development on sites in SGS1a and SGS1w will collectively contribute towards the new access road and bridge linking north-south from Wharf Road to Parkway, and towards improvement of other bridges linking sites to each other across the waterways.

74. The desire to create better access to the waterways for river users, and improve the navigable waterway by increasing head height, has been a long term aspiration for the Council, which has worked closely over many years with Essex Waterways, which manages the Chelmer and Blackwater Navigation. Bridge replacement is supported by the Plan to Improve Rivers and Waterways **(PL021)** (Section E, page 8), and is included in Strategic Priority 9 of Local Plan (paragraph 3.51, page 43 (PDF page 43)). In addition, the width of the bridges is not considered by Essex County Council to meet current shared pedestrian and cycle standard.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
NEW	115		Strategic Growth Site Policy 1w	*Amend sixth bullet under Movement and access, and move to Site infrastructure requirements:* ~~Provide~~ Financial contributions towards three replacement bridges to support cycle connectivity on and off this peninsula site.	To ensure the policy is effective

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

75. The current planning status for Strategic Growth Site Policy 1b (SGS1b) is set out below:

Site	Relevant Masterplan	Relevant Planning Application/s	Housing numbers	Completions on site to date
SGS1b	St Peter's Masterplan	Planning application 24/00228/OUT approved 06.10.26 subject to completion of a S106 agreement	185	0

76. The planning application 24/00228/OUT has been approved since the Local Plan was submitted for examination. No modification is needed to the Local Plan pending the completion of the S106 agreement.

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

CCC Response to Q6.4

77. The capacity for SGS1b has been informed by the approved Masterplan for the Former St Peter's College. The detailed planning application listed above has set 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

78. The non-residential uses for SGS1b are for 7,500 sqm of extra care/independent living accommodation, and two new schools providing for Special Needs and Disabilities (SEND).

79. A masterplan for the former St Peters School site was prepared collaboratively between the Council and Essex Housing (the development arm of Essex County Council) to provide the strategic approach to the development of the site, consistent with the Council's Masterplan Procedure.

80. In relation to the extra care/independent living accommodation, Essex County Council (ECC) is developing this site and considers it a suitable location to help meet the need for Supported and Specialist Housing. The use of part of the site for extra care/independent living accommodation was agreed through the Masterplan approved in 2022.

81. A masterplan for the former St Peters School site was prepared collaboratively between the Council and Essex Housing (the development arm of ECC) to provide the strategic approach to the development of the site, consistent with the Council's Masterplan Procedure. Land in the south east corner of the site was selected by the DfE for the provision of 2 new SEND schools. The masterplan proposed to commence the development with the two new schools and associated infrastructure including the initial spine road serving the new schools and future housing.

82. In 2015, ECC undertook a business case to review the provision of Special Educational Needs and Disabilities (SEND). This identified the need to build four new special schools across Essex. The former St Peter's site was identified as being ideal due to its size and location. ECC and Seax Trust submitted two free school applications to the DfE setting out the need to develop schools and with the St Peter's site as the proposed location. Both were successful and were fully funded by the DfE.

83. Permission was granted in June 2021 (21/00396/FUL) for a single storey building for use as a 64-place Special Educational Needs and Disabilities School (SEND) for Social, Emotional and Mental Health (SEMH) aged 7-16 and two storey residential building to accommodate 15 students. The SEN school is known as the Sir Geoff Hurst academy and opened in May 2025, and currently has its full intake of pupils.

84. Permission was granted in June 2021 (21/00395/FUL) for a single storey building for use as a 70-place Special Educational Needs and Disabilities School (SEND) for Social, Emotional and Mental Health (SEMH) for autism and a two storey residential building to accommodate 10 students. The SEN school is known as The Hawthorn School and opened in February 2025, and currently has its full intake of pupils.

85. Due to the completed provision of the schools, the Council is proposing the following modifications to reflect the latest position.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
NEW	119		Strategic Growth Site 1b – Former St Peter's College	*Amend upper part of policy:* Land off Langton Avenue, formerly St Peter's College and playing fields, as shown on the Policies Map, is allocated for residential~~,~~ ~~specialist education uses,~~ and community uses.	To ensure the policy is up to date
NEW	119		Strategic Growth Site 1b – Former St Peter's College	Delete third bullet: ~~• Two new schools providing for Special Needs and Disabilities (SEND).~~	To ensure the policy is up to date
NEW	119		Strategic Growth Site 1b – Former St Peter's College	*Delete second bullet under Site infrastructure requirements:* • ~~Two new schools providing for Special Needs and Disabilities (SEND) (Use Class F1(a)) located on around 2.9 hectares of suitable land allocated for education and childcare use~~	To ensure the policy is up to date
NEW	119		Strategic Growth Site 1b – Former St Peter's College, Paragraph 7.44	~~*Delete paragraph 7.44:* Land at the southern part of the allocated site is required by the Local Education Authority for provision of two new special schools providing for Special Needs and Disabilities (SEND) for age 7-~~	To ensure the policy is up to date

				~~16 pupils, one for autistic spectrum condition, and one for social, emotional and mental health needs. The schools will be funded by the Education and Skills Funding Agency, and Essex County Council.~~	

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

86. It is the Council's position that the development requirements for the sites making up Strategic Growth Site 1a 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.

87. 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)).

88. No further safeguards or mitigation measures are required.

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

CCC Response to Q6.7

89. 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. The sites making up Strategic Growth Site 1a are expected to be delivered from 2028/29 onwards, and are included in **LDS012** on page 7 (PDF page 7).

90. 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.

91. The Council's own monitoring information shows short timescales for determining REM applications. The delivery programme was agreed with the developer's agent in February 2026. For these reasons the expected timescale and rate of development for the site is justified and realistic.

92. The Council proposes the following modification to the Reasoned Justification for SGS1b 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
97	29		Strategic Growth Site 1b – Former St Peter's College, paragraph 7.41	*Amend third sentence:* The allocation is for around 185 new homes between 2025<u>8</u> and 20~~29~~<u>32</u>, along with up to 7,500 sqm non-residential uses comprising extra care/independent living accommodation (around 60 units) and other community facilities to bring significant benefits not only to the site's residents but the wider community.	To reflect the April Housing Site Schedule

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

CCC Response to Q6.8

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

Q1 i	**Would the development of SGS1b be consistent with the requirements for open space contained in paragraph 99 of the 2023 Framework?**

CCC Response to Q1i

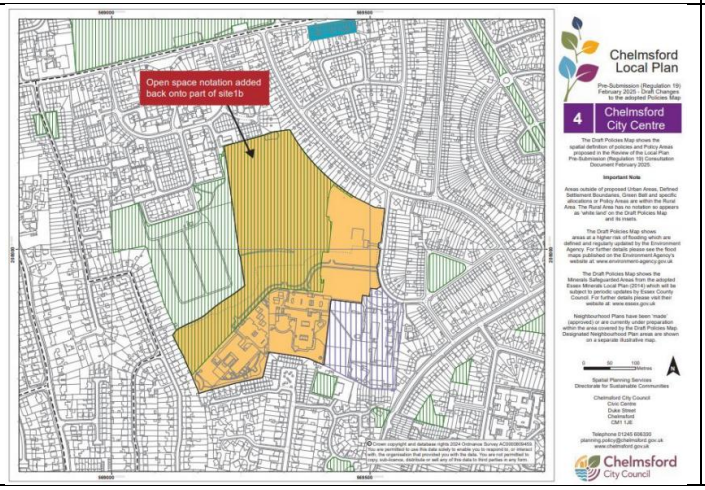
94. As set out, the school provision has been completed (in relation to 2023 NPPF paragraph 99). In relation to open space, the site contains open space comprising former school playing fields. Whilst open space will be provided on site it is not proposed to take the form of playing fields, with this position being agreed through the approved planning application.

Q1 j	**Are changes needed to the Policies Map to show areas designated as open space?**

CCC Response to Q1j

95. Changes are proposed to the Policies Map to show areas currently designated as open space, to correct an omission as set out in **SD005** referenced as **MOD 341** and **MOD 361**, and shown below.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
341	29		Map 4	Open space notation added back onto part of site 1b.	To correct omission
361			Map 4		To correct omission

Q1 k	**What evidence supports the requirement for two new schools to be provided on the site? How would suitable land within the site be identified?**

CCC Response to Q1k

96. The schools are fully built and occupied. For a complete response to Q1 K please see the response provided at Q6.5 for this site.

Location 1 - Strategic Growth Site Policy 1d – Riverside Ice & Leisure Land	
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

97. The current planning status for SGS1d is set out below:

Site	Relevant Masterplan	Relevant Planning Application/s	Housing numbers	Completions on site to date
1d	None	None	150	0

98. Detailed pre application discussions were held in 2021; viability work and detailed flood conveyance testing was undertaken in 2023. The assessments informed the revisions to the proposals which were reconsulted through pre-application engagement in 2024.

99. An updated SHELAA (26SHELAA5) has been submitted and there are on-going pre-application discussions concerning the redevelopment of the site for up to 190 homes, 4 commercial units (totalling 475 sqm) and 135 public parking spaces, 95 residential spaces and 25 spaces for the adjacent leisure centre.

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

CCC Response to Q6.4

100. The capacity for SGS1d has been informed by a site appraisal conducted internally, including an informal development brief prepared as part of a wider 2019 redevelopment of the leisure centre and adjoining land.

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

101. There is a requirement on this site for food and drink/retail units at ground floor to strengthen the neighbourhood to the north of the City Centre main shopping area. Measures to rationalise existing car parking are also proposed as part of the building form. The scale and type/mix of these elements will be determined through the site planning process.

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

102. It is the Council's position that the development requirements for SGS1d 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.

103. 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)).

104. No further safeguards or mitigation measures are considered to be necessary.

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

CCC Response to Q6.7

105. 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. The site is expected to be delivered between 2032 and 2037.

106. 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.

107. As a site in the Council's ownership, the expected timescale and rate of development for the site is justified and realistic.

108. The Council proposes the following modification to the Reasoned Justification for SGS1d 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
100	123		Strategic Growth Site Policy 1d Paragraph 7.52	*Amend last sentence:* It is well-located for a residential development of around 150 new homes between 20~~26~~32 and 20~~28~~37.	To reflect the latest housing site schedule

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

CCC Response to Q6.8

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

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

110. The current planning status for SGS1e is set out below:

Site	**Relevant Masterplan**	**Relevant Planning Application/s**	**Housing numbers**	**Completions on site to date**
1e	None	None	100	0

111. 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

112. The capacity for SGS1e has been informed by a site appraisal conducted internally, which has assessed various delivery and development options.

113. A revised SHELAA has been submitted based on a mixed density of between 98 and 123 homes (a combination of apartments, town houses and 5 person + units).

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

114. The non-residential uses for this site include integration of flexible workspace facilities, to enhance sustainable and economic growth within the City Centre. The scale and type/mix of this use will be determined through the site planning process.

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

115. It is the Council's position that the development requirements for SGS1e 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.

116. 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)).

117. No further safeguards or mitigation measures are considered to be necessary.

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

CCC Response to Q6.7

118. 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. The site is expected to be delivered between 2030 and 2032.

119. 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.

120. As a site in the Council's ownership, the expected timescale and rate of development for the site is justified and realistic.

121. The Council proposes the following modification to the Reasoned Justification for SGS1d 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
102	125		Strategic Growth Site Policy 1e Paragraph 7.62	*Amend last sentence:* This justifies intensive use of part of the site for City Centre living at a city scale (i.e. taller, higher-density buildings) for around 100 new homes between 20~~35~~30 and 203~~6~~2, while retaining the majority of public car parking on site.	To reflect the latest housing site schedule

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

CCC Response to Q6.8

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

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

123. The current planning status for SGS1f is set out below:

Site	**Relevant Masterplan**	**Relevant Planning Application/s**	**Housing numbers**	**Completions on site to date**
1f	None	19/01618/FUL approved 23/11/21 A number of conditions have been discharged	197	0

124. 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

125. The capacity for SGS1f has been informed by the planning application, now approved for 197 units.

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

126. The non-residential uses for this site include integration of flexible workspace facilities, to enhance sustainable and economic growth within the City Centre. The scale and type/mix of this use will be determined through the site planning process.

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

127. It is the Council's position that the development requirements for SGS1f 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.

128. 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)).

129. In relation to further safeguards, the Council proposes the following modification to ensure the policy is effective.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
104	127		Strategic Growth Site Policy 1f	*Add additional bullet point under Design and layout:* • Layout shaped by utility easements	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

130. 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. The site is expected to be delivered between 2030 and 2031.

131. 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.

132. As a site with planning permission, the expected timescale and rate of development for the site is justified and realistic.

133. The Council proposes the following modification to the Reasoned Justification for SGS1f 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
105	128		Strategic Growth Site Policy 1f Paragraph 7.72	*Amend third sentence:* Development is expected to be delivered between 202~~6~~30 and 202~~7~~31.	To reflect the latest housing site schedule

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

CCC Response to Q6.8

134. No further modifications are needed for soundness.

Location 1 - Strategic Growth Site Policy 1y – Land Between Hoffmanns Way and Brook Street	
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

135. The current planning status for SGS1y is set out below:

Site	**Relevant Masterplan**	**Relevant Planning Application/s**	**Housing numbers**	**Completions on site to date**
1y	None	None	100	0

136. 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

137. The capacity for SGS1y has been informed by a site appraisal conducted internally, and ongoing discussions with the site owner.

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

138. The non-residential uses for this site include integration of flexible workspace facilities, to enhance sustainable and economic growth within the City Centre. The scale and type/mix of this use will be determined through the site planning process.

139. There is a further requirement for equipped play provision for children and teenage users. There is a lack of such provision in the City Centre which this site could help to provide due to its size and central location. The gap in provision is identified in the Open Space Study **(BG003-B)** which sets out at page 54 (PDF page 58) the gaps in

catchments, including for the City Centre. The size of this provision will be determined through the site planning process.

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

140. It is the Council's position that the development requirements for Site 1y 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.

141. 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)).

142. Apart from the proposed modification at Q1 l No further safeguards or mitigation measures are considered necessary.

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

CCC Response to Q6.7

143. 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. The site is expected to be delivered between 2032 and 2037.

144. 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.

145. The owner has engaged through the local plan process (PSQ25-6061) and submitted preliminary enquiries on development of the site. The expected timescale and rate of development for the site is justified and realistic.

146. The Council proposes the following modification to the Reasoned Justification for SGS1y 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
108	130		Strategic Growth Site Policy 1y Paragraph 7.83	*Amend last sentence:* As such, it is well located for a residential development of around 100 new homes between 2035~~5~~2 and 2036~~6~~7.	To reflect the latest housing site schedule

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

CCC Response to Q6.8

147. Apart from the proposed modification at Q1 l no further modifications are needed for soundness.

Q1 l	**l. Should Policy 1y be modified to require an archaeological assessment?**

CCC Response to Ql

148. This site has been identified in the Archaeological Impact Assessment **(PL009)** as requiring an archaeological impact assessment as set out on page 58. The following modification is proposed to address this.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
107	130		Strategic Growth Site Policy 1y	*Add additional bullet point under Historic and natural environment:* • Undertake an Archaeological Assessment	To ensure the policy is effective

Location 1 - Strategic Growth Site Policy 1cc – Andrews Place, Land west of Rainsford Road	
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

149. The current planning status for SGS1cc is set out below:

Site	**Relevant Masterplan**	**Relevant Planning Application/s**	**Housing numbers**	**Completions on site to date**
1cc	None	Planning application 26/00404/FUL submitted 27/03/26	250 (181 net new)	0

150. 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

151. The capacity for Strategic Growth Site Policy 1cc has been informed by a site appraisal conducted internally, and significant pre-application discussions with the site owner, culminating with the planning application 26/00404/FUL.

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

152. No specific non-residential uses are proposed for this site.

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

153. It is the Council's position that the development requirements for SGS1cc 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.

154. 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)).

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

CCC Response to Q6.7

155. 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. The site is expected to be delivered between 2029 and 2032.

156. 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.

157. The owner has engaged through the local plan process (PSQ25-2974, PSQ25-2983, PSQ25-2986) and has now submitted a full planning application. 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 **(SOCG015).** The expected timescale and rate of development for the site is therefore justified and realistic.

158. The Council proposes a modification to SGS1cc to reflect the April 2026 Five Year Housing Site Schedule. This is included in the response to Q1m below where a further modification is proposed to the same paragraph.

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

CCC Response to Q6.8

159. The Council proposes a modification to SGS1cc to reflect the April 2026 Five Year Housing Site Schedule. This is included in the response to Q1m below where a further modification is proposed to the same paragraph.

Q1 m	**What is the justification for the required 100% affordable housing? Would an element of market housing be acceptable on the site? Is there evidence that the site is available and capable of being delivered within the plan period?**

CCC Response to Q1 m

160. The site currently accommodates affordable bungalows occupied by older people and is owned and managed by a large housing association Delta Housing Ltd (formerly CHP). Following Pre-Submission representations, a statement of common ground was agreed with CHP (SOCG015) including proposed modifications to provide flexibility for housing provision on the site. Importantly, this flexibility would ensure no net loss of affordable housing for rent on the site.

161. This modification is included below, along with a modification 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
109	132		Strategic Growth Site Policy	*Amend first part of policy:* Land at Andrews Place, as shown on the Policies Map, is allocated for residential	To ensure the policy is effective

			1cc	redevelopment, comprising comprehensive regeneration ~~for 100% affordable housing~~ to ensure no net loss of affordable housing for rent. Amount and type of development: • Around 250 new ~~affordable~~ homes (18~~3~~1 net new ~~affordable~~ homes) of a mixed size and type to include specialist residential accommodation for older people. The final amount of new homes will be confirmed through the planning application process.	
110	133		Strategic Growth Site Policy 1cc, Paragraph 7.93	*Amend paragraph:* The site lies close to the City Centre, and the railway and bus transport hubs. As such it is well located for a residential redevelopment of around 250 new ~~affordable~~ homes (18~~3~~1 net new units) for delivery between 20~~26~~29-203~~1~~2. The site currently accommodates 69 low density affordable bungalows occupied by older people and is owned and managed by Chelmer Housing Partnership (CHP).	To reflect the latest housing site schedule

Location 1 - Strategic Growth Site Policy GS1 – Growth sites in Chelmsford City Centre/Urban Area (sites 1g – 1bb)	
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

162. None of the sites GS1g to GS1bb have a masterplan. The current planning status for these sites is set out below:

Site	**Relevant Planning Application/s**	**Housing numbers**	**Completions on site to date**	**Changes since submission**
GS1g	None	29	0	No
GS1h	None	80	0	No
GS1i	Updated SHELAA submitted	75	0	No
GS1z	None	50	0	No
GS1k	Planning application 22/02263/FUL approved 20/12/24; S106 completed	41	0	No
GS1aa				
GS1l	None	30	0	No
GS1m	Planning application 24/00293/FUL approved 02/10/2024; conditions being discharged	22	0	No
GS1n	None	20	0	No
GS1p	None	15	0	No
GS1q	Planning application 23/00116/FUL approved 20/12/23	18	0	No
GS1r	None	12	0	No
GS1bb	Planning application 22/02196/FUL approved 19/04/23. Site work commenced.	12	0	No
GS1s	Planning application 23/00195/FUL approved 07/11/2023; conditions being discharged	6	0	No
GS1t	None	10	0	No

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

CCC Response to Q6.4

163. The capacity for sites GS1g to GS1bb has been informed by site appraisals conducted internally, discussions with site promoters, and where shown in the table at **Q6.3**, through planning applications.

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

164. No specific non-residential uses are proposed for these sites. However, Policy GR1 which sits above the site policies encourages integration of proportionate workspace, employment and community facilities. The size and type of such uses will depend on demand at the time of detailed site planning.

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

165. It is the Council's position that the development requirements for sites GS1g to GS1bb 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.

166. 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)).

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

CCC Response to Q6.7

167. 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.

168. 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.

Site	Timescale
GS1g	2032-36
GS1h	2032-36
GS1i	2031-32
GS1z	2030-31
GS1k	2028-29
GS1aa	2031-32
GS1l	2032-36
GS1m	2027-28
GS1n	2032-36
GS1p	2032-36
GS1q	2029-30
GS1r	2031-32
GS1bb	2027-28
GS1s	2026-27
GS1t	2032-36

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

CCC Response to Q6.8

169. The Council considers that no further modifications are needed for soundness.

Location 1 - Strategic Growth Site Policy 1dd – Land at former Kay-Metzeler Premises, Brook Street	
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

170. The current planning status for this site is set out below.

Site	Relevant Masterplan	Relevant Planning Application/s	Housing numbers	Completions on site to date
SGS1dd	None	None	100	0

171. There have been no changes since the Local Plan was submitted for Examination, so no modifications are needed.

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

CCC Response to Q6.4

172. The capacity for SGS1dd 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 2) which shows how the housing site could be developed to suitably achieve the proposed number of homes and supporting on-site land-uses such as sustainable drainage systems (SUDS). It also demonstrates how site access could be suitably achieved.

173. A Statement of Common Ground has been drafted with the site promoter including reference to this site capacity.

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

174. No non-residential uses are proposed for this site.

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

175. It is the Council's position that the development requirements for the site are clear and consistent with the approach across the Local Plan. The requirements for the 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.

176. 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)).

177. In relation to further safeguards, the Council proposes the following modifications to the policy and reasoned justification ensure the policy is effective.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
111		17	Strategic Growth Site Policy 1dd	*Add additional bullet point under Design and layout:* • Layout shaped by utility easements	To ensure the policy is effective
112		19	Strategic Growth Site Policy 1dd	*Add new paragraph after paragraph 2.15:* <u>There are existing surface water sewers within the site boundary. Layout should safeguard suitable access for the maintenance of sewerage infrastructure.</u>	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

178. 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. The site is expected to be delivered between 2028 and 2030.

179. 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.

180. The delivery timeframe, as set out in the Housing Site Schedule, has been agreed with the site promoter.

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

CCC Response to Q6.8

181. No modifications are considered to be necessary for soundness.

Matter 6 – Site Assessment and Selection **Issue 1: Site Allocations**	
Location 2 - West Chelmsford - Strategic Growth Site Policy 2	
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

183. The current planning status for this site is summarised in the table set out below (where a planning application is submitted the housing/employment 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
Strategic Growth Site 2 - West Chelmsford	West Chelmsford Masterplan approved January 2021 (Ref: 18/00001/MAS)	Outline planning permission (Ref:21/01545/OUT) – resolution to grant December 2024	880 homes	0

184. The S106 agreement is expected to move to engrossment stage imminently.

185. There have been no changes to the site's planning status 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

186. The capacity for Strategic Growth Site 2 has been informed by the approved Masterplan, together with the detailed planning application listed above which sets out the more detailed 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

187. A neighbourhood centre is required through the site policy. The neighbourhood centre will need to make provision for community facilities and health care, and a main unit for convenience food shopping not exceeding 500sqm gross floorspace.

188. The size of a main unit for convenience food shopping 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).

189. 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 2023 NPPF.

190. The scale of development in this location will require a new primary school (Use Class F1(a)) with co-located 56 place early years and childcare nursery (Use Class E(f)) on 2.1 hectares of suitable land allocated for education and childcare use. The developer will be expected to provide the land and costs towards the physical schemes provision with delivery through the Local Education Authority.

191. 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'*.

192. 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
Primary School*	2FE (420 places) co-located with commensurate early years and childcare)	2.1 ha	Table 5

* 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.

193. The Council considers that the scale and type/mix of employment and other uses proposed for Strategic Growth Site Policy 2 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

194. It is the Council's position that the development requirements for Strategic Growth Site 2 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.

195. 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.

196. 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.

197. The Council considers that Strategic Growth Site Policy 2 is sound.

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

CCC Response to Q6.7

198. 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.

199. 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.

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

201. An amendment to **MOD Ref 120** on page 33 (pdf page 34) in the Schedule of Proposed Modifications **(SD005)** is required to site 2 for clarification.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
AMEND REF 120	146		Strategic Growth Site Policy 2 Paragraph after 7.115	Development is expected to be delivered between 2025~~9~~ and 2041.	For clarity

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

CCC Response to Q6.8

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

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

Growth Area 1- Central and urban Chelmsford	
Location 3 – East of Chelmsford – Strategic Growth Site Policies 3a – 3d, Policy SPA5 – Sandford Mill Special Policy 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

204. This broad location for growth, as shown on the Key Diagram (Figure 14), comprises the following three Strategic Growth Sites and one employment site:
    a. 3a: East of Chelmsford – Manor Farm
    b. 3b: East of Chelmsford – Land North of Maldon Road (Employment Site)
    c. 3c: East of Chelmsford – Land South of Maldon Road
    d. 3d: East of Chelmsford – Land North of Maldon Road (Residential Site)

205. 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
3a	Masterplan approved 2021 **PL049**	22/01732/FUL for residential development of 342 dwellings including 126 affordable dwellings; landscaping; local open space; highway infrastructure; pedestrian; and cycle routes; vehicles and cycle parking; drainage works; ground re-profiling: and works to provide services and utilities. Change of use of land from agriculture to provide a country park, with associated works including the laying out of a visitor car park and access road – advanced discussions and likely to be presented to planning committee with section 106 agreement in Autumn 2026. 22/01732/OUT for a phased development comprising 18 self-build dwellings with all matters reserved to be considered alongside the FUL application at the same committee.	342	0

Site	Relevant Masterplan	Relevant Planning Application/s	Housing numbers	Completions on site to date
		24/01284/FUL means of access to the site by way of a five-arm roundabout junction that provides access to Strategic Growth Sites 3a, 3c and 3d approved 10/12/25.		
3 b	Masterplan approved 2021 **PL050**	The site has an approved masterplan (Ref:20/00003/MAS) and a planning application has been submitted for up to 5,000sqm of commercial floorspace and provision of a day care nursery (Ref:22/00916/FUL and 22/0916/OUT).	5,000 sqm & Stand alone nursery	
3 c & d	Masterplan approved 2021 **PL050**	22/00916/OUT & 22/00916/FUL submitted in May 2022 by Redrow Homes Ltd and The Speakman Family withdrew the application in January 2025. The sites changed ownership due to a company takeover. Pre-application proposals submitted on behalf of Barratt David Wilson and formal submission for the development of sites 3c and 3d is expected imminently. 24/01284/FUL for a five-arm roundabout junction that provides access to Strategic Growth Sites 3a, 3c and 3d was approved 10/12/25.	174	

206. Since the Plan was submitted there have been ongoing discussions progressing the pending applications.

207. No modifications are required to the respective policies.

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

CCC Response to Q6.4

208. The capacity for the housing site has been informed by the development of the approved master plans **PL049 and PL050** and subsequently refined by the planning application processes for 22/01732/FUL & 22/01732/OUT, 22/00916/FUL and 22/00916/OUT and 24/01284/FUL.

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

209. The site has an approved masterplan **PL050**. A planning application was submitted for up to 5,000sqm of commercial floorspace and provision of a day care nursery (Ref:22/00916/FUL and 22/00916/OUT), however this was subsequently withdrawn.

210. The application included the provision of a day care nursery in accordance with the site policy requirements. 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'*.

211. In Growth Area 1, ECC considers (I**NF007**, **page 5**) that there will be sufficient capacity to accommodate the demand generated by the identified growth in the Chelmsford Urban Area. The remainder of the growth amounting to some 136 places is to be accommodated through requirements identified in the Adopted Local Plan and approved masterplans on sites carried over in this Plan, namely at West Chelmsford (Policy SGS 2 - as part of a co-located new primary school) and at East Chelmsford (Policy SGS 3b), adjacent to the Sandon Park and Ride, as a 56 place stand-alone facility.

212. 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.

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

213. It is the Council's position that the development requirements for Growth Site Policies 3a-d 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.

214. 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**)).

215. In relation to further safeguards, the Council proposes the following modifications to Growth Site Policies 3a-d and Strategic Growth Site Policy 3 a- d to ensure the policy is effective in mitigating potential recreational disturbance on Blakes Wood and Lingwood Common SSSI, Danbury Common SSSI and Woodham Waler Common SSSI.

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
125	151			Amend first sentence: Even with onsite provision of the Country Park, the development will have the potential to result in an increase in recreational pressure on Blakes Wood and Lingwood Common SSSI, Danbury Common~~, and Lingwood Common~~ SSSIs, and Woodham Walter Common SSSI, which are in close proximity to the site.	For clarity.
129	158			Amend second sentence: The residential developments in East Chelmsford (SGS3a, SGS3c and SGS3d), East Chelmsford Garden Community (SGS16a) and Danbury (SGS13) have the potential to result in an increase in recreational pressure on Blakes Wood & Lingwood Common SSSI, Danbury Common SSSI, and Woodham Walter Common SSSIs, which are in proximity to the site.	For clarity.
129	158			Amend second sentence: The residential developments in East Chelmsford (SGS3a, SGS3c and SGS3d), East Chelmsford Garden Community (SGS16a) and Danbury (SGS13) have the potential to result in an increase in recreational pressure on Blakes Wood & Lingwood Common SSSI, Danbury Common SSSI, and Woodham Walter Common	For clarity.

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
				SSSIs, which are in proximity to the site.	
132	160			Amend second sentence: The residential developments in East Chelmsford (SGS3a, SGS3c and SGS3d), East Chelmsford Garden Community (SGS16a) and Danbury (SGS13) have the potential to result in an increase in recreational pressure on Blakes Wood & Lingwood Common SSSI, Danbury Common SSSI, and Woodham Walter Common SSSIs, which are in proximity to the site.	For clarity.

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

CCC Response to Q6.7

216. 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 Sites 3a, c & d are expected to be deliver from 2027 onwards

217. 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.

218. The site changed ownership due to a company takeover and a long standing planning application was withdrawn on 31 January 2025 (Ref:22/00916/FUL and

22/0916/OUT). The planning application covered sites 3b, 3c and 3d. Since there have been significant preapplication discussions with Barratt David Wilson and formal submission of an application for the redevelopment of sites 3c and 3d is expected imminently. 24/01284/FUL for a five arm roundabout junction that provides access to Strategic Growth Sites 3a, 3c and 3d was approved 10/12/25.

219. The delivery timeframe for Strategic Growth Sites 3a, c & d, as set out in the Housing Site Schedule, was agreed with the site promoters prior to update.

220. The Council proposes the following modifications to the reasoned Justification for Growth Site Policies 3a, 3c & 3d to reflect the 2026 Five year Housing Site Schedule.

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
124	150			*Amend second sentence:* This number is reflected in the 5 Year Housing Site Schedule April 2025~~5~~4. *Amend fourth sentence:* This number is reflected in the 5 Year Housing Site Schedule April 2024~~5~~6.Development is expected to be delivered between 2025~~5~~7 and 2035~~5~~6. *Amend last sentence:* It is one of four development sites East of Chelmsford, ~~adjacent to~~ within the Chelmsford Urban Area and close to local services and facilities in Great Baddow and Sandon.	To reflect latest April 2026 Housing Site Schedule For clarity and consistency
126	156			*Amend first, second and fourth sentence:* The site has an approved masterplan (Ref:20/00003/MAS) ~~and a planning application has been submitted for up to 109 new homes (Ref:22/00916/FUL and 22/0916/OUT).~~ This number is reflected in the 5 Year Housing Site Schedule April 20246. If this proposal is	To reflect latest April 2026 Housing Site Schedule

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
				not implemented and a new proposal comes forward, the site capacity will be considered on its individual merit. Development is expected to be delivered between 2025~~5~~7 and 202~~9~~31.	
131	159			*Amend first, second and fourth sentence:* The site has an approved masterplan (Ref:20/00003/MAS) ~~and a planning application has been submitted for up to 65 new homes (Ref:22/00916/FUL and 22/0916/OUT~~). This number is reflected in the 5 Year Housing Site Schedule April 2024~~5~~6. If this proposal is not implemented and a new proposal comes forward, the site capacity will be considered on its individual merit. Development is expected to be delivered between 2025~~5~~7 and 202~~9~~31.	To reflect latest April 2026 Housing Site Schedule

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

CCC Response to Q 6.8

221. It is the Council's position that with the proposed modifications listed in in the table below and set out in **(SD005, pages 33 [PDF page 34] – page 35 [PDF page 36])** Schedule of Proposed Modifications are sound.

222. Other proposed additional modifications to the site are set out in **SD005** (**pages 33 [PDF page 34] – page 35 [PDF page 36])** 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
122	148			*Amend first sentence:* Land to the north of Great Baddow (Manor Farm) within the ~~adjacent to~~ Chelmsford Urban Area as shown on the Policies Map, is allocated for a landscape-led, high quality comprehensively planned new sustainable neighbourhood that maximises opportunities for active and sustainable travel as well as a new Country Park	For clarity and consistency
124	150			*Amend second sentence:* This number is reflected in the 5 Year Housing Site Schedule April 2025~~4~~. *Amend fourth sentence:* This number is reflected in the 5 Year Housing Site Schedule April 2024~~6~~.Development is expected to be delivered between 202~~5~~7 and 203~~5~~6. *Amend last sentence:* It is one of four development sites East of Chelmsford, ~~adjacent to~~ within the Chelmsford Urban Area and close to local services and facilities in Great Baddow and Sandon.	To reflect latest April 2026 Housing Site Schedule For clarity and consistency
125	151			*Amend first sentence:* Even with onsite provision of the Country Park, the development will have the potential to result in an increase in recreational pressure on Blakes Wood and Lingwood Common SSSI, Danbury Common~~, and~~	For clarity.

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
				~~Lingwood Common~~ SSSIs, and Woodham Walter Common SSSI, which are in close proximity to the site.	
126	156			*Amend first, second and fourth sentence:* The site has an approved masterplan (Ref:20/00003/MAS) ~~and a planning application has been submitted for up to 109 new homes (Ref:22/00916/FUL and 22/0916/OUT).~~ This number is reflected in the 5 Year Housing Site Schedule April 20246. If this proposal is not implemented and a new proposal comes forward, the site capacity will be considered on its individual merit. Development is expected to be delivered between 202~~5~~7 and 202~~9~~31.	To reflect latest April 2026 Housing Site Schedule
129	158			*Amend second sentence:* The residential developments in East Chelmsford (SGS3a, SGS3c and SGS3d), East Chelmsford Garden Community (SGS16a) and Danbury (SGS13) have the potential to result in an increase in recreational pressure on Blakes Wood & Lingwood Common SSSI, Danbury Common SSSI, and Woodham Walter Common SSSIs, which are in proximity to the site.	For clarity.
131	159			*Amend first, second and fourth sentence:* The site has an approved masterplan (Ref:20/00003/MAS) ~~and a planning application has been~~	To reflect latest April 2026 Housing Site Schedule

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
				~~submitted for up to 65 new homes (Ref:22/00916/FUL and 22/0916/OUT~~). This number is reflected in the 5 Year Housing Site Schedule April 2024<u>6</u>. If this proposal is not implemented and a new proposal comes forward, the site capacity will be considered on its individual merit. Development is expected to be delivered between 202~~5~~<u>7</u> and 202~~9~~<u>31</u>.	
132	160			*Amend second sentence:* The residential developments in East Chelmsford (SGS3a, SGS3c and SGS3d), East Chelmsford Garden Community (SGS16a) and Danbury (SGS13) have the potential to result in an increase in recreational pressure on Blakes Wood <u>&</u> <u>Lingwood Common SSSI</u>, Danbury Common <u>SSSI</u>, and <u>Woodham Walter</u> Common SSSIs, which are in proximity to the site.	For clarity.
256	232		Policy SPA5	*Amend last sentence of policy*: New development proposals to the south of Sandford Mill will allow the provision of a new vehicular access ~~to Maldon Road (A414)~~ <u>road to the Country Park with a new pedestrian and cycle bridge connecting the Country Park to Sandford Mill.</u>	For clarity
257	232		Policy SPA5 Paragraph 7.480	*Amend paragraph:* Vehicular access is achieved from Chelmsford via Brook End Road. There is an opportunity for ~~this~~ access to <u>Sandford Mill</u> to be improved.	For clarity

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
				A ~~N~~new vehicular access ~~to Maldon Road (A414)~~ road is proposed into the adjacent country park from development to the south. It is intended for most visitors to Sandford Mill to park in the country park car park south of the Navigation and access Sandford Mill via a new pedestrian and cycle bridge ~~connections are proposed between the new development proposals to the south and Sandford Mill~~. There is also an opportunity to promote more sustainable modes of transport to Sandford Mill, such as use of the Chelmer and Blackwater Navigation to link to the City Centre. Additional moorings may also be appropriate in order to increase access to the waterways.	

Q6a	**For site 3a, is the proposed scale of development justified, having regard to constraints and the provision of necessary infrastructure?**

CCC Response to Q6a

223. The infrastructure included in the site-specific policy is necessary to make the development sustainable and provide the supporting infrastructure as evidenced by the site-specific viability work which supports planning application 22/01732/OUT and 22/01732/FUL). Density is constrained by the adjacent flood plain and nearby heritage assets, with much work done on character areas to arrive at an acceptable position. A reduction in the number of dwellings would exacerbate the viability picture and an increase would raise concerns re flood risk and heritage harm.

Q6b	**For site 3a and 3c, what is the justification for requiring electricity cables to be removed and replaced underground? Has this been costed and can it be viably delivered?**

CCC Response to Q6b

224. Development of 3a and 3c (and the highway between them as part of the 5-arm roundabout scheme) presents an opportunity to remove the overhead cables from the street scene to improve visual amenity. The developer of 3a is proposing to underground the cables in the residential parcel and this has been factored into their build costs already. The developer (Hopkins) is also progressing the 5-arm roundabout scheme, which also includes undergrounding the cables (and 5-arm roundabout costs are also already factored into the viability picture for 3a).

225. During recent pre-app discussions on 3c, it has also been confirmed that the developers (Barratt-Redrow) intend to underground the cables through 3c. The need for a pedestrian route through Cross Wood (under the existing cables route) also presents a further opportunity.

Q6c	**In Policy 3a, what is the reason for restricting the required bridge connecting the Country park to Sandford Mill to pedestrian and cycle access? Does Policy SPA5 need to be modified to reflect this requirement?**

CCC Response to Q6c

226. The car park is to be provided in Location 3a. The purpose of the bridge is to provide cycle access across the site and into the city centre to enhance sustainability. It is proposed the bridge provides access for maintenance and emergency vehicles only.

227. The Council proposes the below modification to SPA 5 as set out in **SD005, page 65 [PDF page 66].**

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
256	232		Policy SPA5	Amend last sentence of policy: New development proposals to the south of Sandford Mill will allow the provision of a new vehicular access ~~to Maldon Road (A414)~~ road to the Country Park with a new pedestrian and cycle bridge connecting the Country Park to Sandford Mill.	For clarity
257	232		Policy SPA5 Paragraph 7.480	Amend paragraph: Vehicular access is achieved from Chelmsford via Brook End Road. There is an opportunity for ~~this~~ access to Sandford Mill to be improved. A ~~N~~new vehicular access ~~to Maldon Road (A414)~~ road is proposed into the adjacent country park from development to the south. It is intended for most visitors to Sandford Mill to park in the country park car park south of the Navigation and access Sandford Mill via a new pedestrian and cycle bridge ~~connections are proposed between the new development proposals to the south and Sandford Mill~~. There is also an opportunity to promote more sustainable modes of transport to Sandford Mill, such as use of the Chelmer and Blackwater Navigation to link to the City Centre. Additional moorings may also be appropriate in order to increase access to the waterways.	For clarity

Q6d	**Is there evidence that sites 3b, c and d are available and capable of being delivered within the plan period?**

CCC Response to Q6d

228. The Council's position is that the sites are available and capable of being delivered within the Plan Period. Planning applications are progressing to determination, which will enable significant investment into infrastructure, and there are also ongoing pre application discussions.

Location 4 – Galleywood – Growth Site Policy 4	
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

229. The site has outline (22/00397/OUT) and reserved matters planning permission (24/01093/REM) for 24 new dwellings.

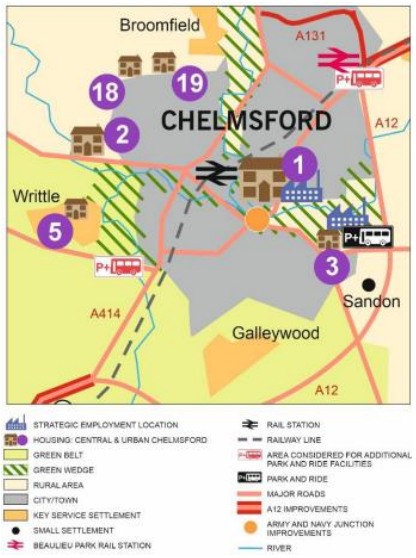
230. The site is now built out and was completed in March 2026. This site has therefore been removed from the April 2026 Five Year Housing Site Schedule (LDS012). The following modifications are proposed to the Plan to reflect this: **(MOD Ref 90, 91,133 and 162 (SD005).**

231. 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
Growth Site Policy 4 Land North of Galleywood Reservoir	N/A	22/00397/OUT and 24/01093/REM approved for 24 dwellings	24	24

Modifications

Ref in SD005	Page No in PSLP	Page No in ASLP	Policy/ Para etc	Modification proposed	Reason
90	109		7.11	*Amend paragraph:* In addition, smaller development at <u>the</u> ~~two~~ sustainable Key Service Settlements of ~~Galleywood and~~ Writtle will provide ~~24 homes~~ and 25 homes respectively, alongside opportunities to contribute towards and enhance existing	To reflect the latest April 2026 HSS

				facilities and services of the villages~~.~~	
91	110		Figure 16	*Replace Growth Area 1 – Central and Urban Chelmsford figure to show additional site allocations and remove Growth Site 4:* 	To reflect the latest April 2026 HSS
133	161		Growth Site Policy 4 & Paragraphs 7.190 – 7.199	*Delete Site from Plan as development now complete*	To reflect latest April 2026 Housing Site Schedule
362	362		Policy Map 16	*Remove Housing Growth Site 4 Allocation as site is now complete*	To reflect the latest April 2026 HSS
Annex C	392		Appendix A	*Remove first row: Allocated in Adopted Local Plan, 4 Land north of Galleywood Reservoir*	To reflect the latest April 2026 HSS

Location 5 – Writtle – Growth Site Policy 5	
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

232. 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
Growth Site Policy 5 – Land Surrounding Telephone Exchange	N/A	N/A	25	0

233. 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

234. The capacity for Growth Site Policy 5 has been informed by a site appraisal conducted internally.

235. This was also informed by a public design workshop for the Neighbourhood Plan in 2019. The report produced following the workshop provided different options for the site ranging from a low density scheme of 10-12 units to a higher density scheme of 20-30 smaller units. The higher density falls within the capacity of around 25 units as specified by the Policy.

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

236. No non-residential uses are proposed on this site so this question is 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

237. 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 this 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.

238. 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)

239. 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

240. The site is due for completion in the years 2032/33-2036/37, see April 2026 Five Year Housing Site Schedule **(LDS012, pdf page 8).**

241. 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 Five Year Housing Site Schedule **(LDS012),** which covers the entire Plan period.

242. 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.

243. Telereal made representation to both the Preferred Options Consultation Document **(PO001)** (PO24-8897) and the Pre-Submission Local Plan **(SD001)**, (PSQ25-4986). The representations welcome the retention of the allocation and confirm that the site will become available in 2031. The representations also agree with the unit number, with caveat for upward flexibility.

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

CCC Response to Q6.8

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

245. The Council considers that Growth Site Policy 5 is sound.

Growth Area 1 – Central and Urban Chelmsford	
Location 18a – North West Chelmsford - Strategic Growth Site Policy 18a	
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

246. This site is promoted by a single developer, Dandara. A statement of common ground **(SOCG029)** has been signed with the site promoter. A masterplan is being prepared by the site promoter, in accordance with the requirement of the site policy, a PPA has been signed with the Council. Pre-application advice is also in progress.

247. The current planning status for this site is summarised in the table set out below (where a planning application is submitted the housing/employment 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
Strategic Growth Site Policy 18a	PPA signed for masterplan.	None	100	0

248. There have been no changes to the site's planning status 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

249. The capacity for Strategic Growth Site Policy 18a 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 4) 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.

250. The final amount of new homes will be confirmed through the planning application process.

251. 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, which will contribute to housing supply in the first five years of the plan adoption.

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

252. Strategic Growth Site 18a does not include non-residential uses on this site.

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

253. 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.

254. 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), and that financial contributions will be sought in accordance with Strategic Policy S10 – Securing Infrastructure and Impact Mitigation (page 93).

255. 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

256. 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.

257. 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.

258. Strategic Growth Site 18a is expected to be delivered from 2029 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 **(SOCG029).**

259. The proposed modification **MOD Ref 137** set out in **(SD005)** Schedule of Proposed Modifications is proposed to reflect latest April 2026 Housing Site Schedule but does not go to matters of soundness.

260. 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
137		21	Strategic Growth Site Policy 18a Paragraph 2.18	*Amend second sentence:* Development is expected to be delivered between 202~~8~~ 9 and 203~~0~~1.	To reflect latest April 2026 Housing Site Schedule

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

CCC Response to Q6.8

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

262. 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.

Q f	**What is the likely impact of the proposed allocation on the following factors:** • **Rural landscape character, agricultural land and heritage assets** • **Biodiversity and green infrastructure,** • **The strategic and local highway network** • **Other infrastructure including public transport, education, health, utilities and recreation;** • **Flood risk and prevention** • **Air quality, light and noise pollution**

CCC Response to Qf

Rural Landscape Character

263. The Additional Sites - Landscape Sensitivity and Capacity Study October 2025 **(PL013)** (page 16-23, PDF page 27-34)) 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 low rise residential development due to its relationship with the settlement edge and the degree of visual enclosure, provided by the boundary vegetation. Guidelines are included for retaining/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.

Agricultural Land

264. Strategic Growth Site 18a is 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 62, PDF page 62)). 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 10-11, PDF page 77)). 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.

265. 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). 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).

Heritage Assets

266. 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 8.0, PDF page 16), which identifies a collection of designated heritage assets on namely the listed buildings located at Chobbings Farm and Priors and non-designated heritage assets at Broomwood Lodge and Kilnfield Barns. The principles for heritage assets and their settings are set out on PDF page 19, and were used to inform the heritage requirements for the site policy.

Biodiversity and Green infrastructure

267. The site policy requirements for the natural environment will ensure the development retains and enhances existing natural landscaping and trees in and on the boundary of the site. 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 priority habitat inventory (within 100m) and local wildlife sites and ancient woodland (within 800m), it concludes that the mitigation measures provided in the site policy are appropriate Appendix C (page 11 (PDF page 77)).

Strategic and local Highway

268. 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)

269. 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 SGS18a 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).

Education

270. 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).**

Health

271. The potential impact of the Local Plan on health provision is assessed through the Infrastructure Delivery Plan (IDP) **(INF012 & INF012-A, Location 1).** 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 150) and incorporated into the site policy requirements.

Recreation

272. The potential impact of the Local Plan on recreation is assessed through the Infrastructure Delivery Plan (IDP) **(INF012** and as updated in **INF012-A, Location 1)**. 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

273. 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.

274. 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)).

275. 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)**.

276. 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.

277. 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). Overall, the evidence base indicates that there are no utility constraints that would prevent the site coming forward for development.

Flood Risk

278. A small section of the site (3%) is at significant risk of surface water flooding, but overall risk of flooding from all sources is low. This is evidenced in the Level 2 Strategic Flood Risk Assessment: Addendum 2025 **(CC018, page 18, pdf page 18)** and Additional Sites Sequential and Exception Test 2025 **(C0019, pages 31-32, pdf pages 32-33)**. Prevention of flood risk would be achieved through site layout planning to ensure that more vulnerable land uses, such as residential, are located towards lowest risk and in this instance away from surface water flooding. **CC019** confirms that this is feasible.

Air quality

279. 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

280. 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)).

Qg	**What mitigation measures would be necessary to ensure a sustainable form of development, and are they clearly set out?**

CCC Response to Qg

281. It is the Council's position that the mitigation measures are necessary and justified to ensure a sustainable form of development. The requirements for the 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.

282. 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.

283. Strategic Policy S16 **(SD001** (page 83)**)** of 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; and with regards Site 18a contribute through masterplanning how a significant shift towards active and sustainable modes will be achieved.

284. ECC, as the Highway Authority, seeks early pre-application discussion with developers and/or land promotors 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.

285. 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.

Qh	**What are the main infrastructure requirements for the site, how were they identified, and how and when will they be delivered?**

CCC Response to Qh

286. The Policy sets out clear the required site infrastructure requirements. This includes appropriate improvements to the local and strategic road network, measures to promote and enhance active and sustainable modes of transport, new and enhanced cycle routes, footpaths, Public Rights of Way and, where appropriate, bridleways and providing, or make financial contributions to new or enhanced sport, leisure and recreation facilities. A number of financial contributions are sought towards primary, secondary, early years education and childcare, as required by the Local Education Authority, other community facilities including healthcare provision as required by the NHS Mid and South Essex Integrated Care Board and police, ambulance and fire and rescue facilities.

287. 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.

288. These infrastructure requirements align with the Infrastructure Delivery Plan (IDP) **(INF012)** (page A-32-A34 (PDF page 181-183)) expectations for Strategic Growth Site 18a, ensuring that development is supported by proportionate S106-funded contributions and on-site provision. This covers essential education capacity (early years, primary and secondary), green infrastructure and recreational space, and sport and leisure facilities, alongside place-making elements such as public art. The

approach reflects a policy requirement for development to mitigate its impacts by funding or delivering necessary transport, community, and social infrastructure, with costs largely met by the developer and no identified funding gap. The IDP clearly sets out the anticipated delivery mechanism.

Growth Area 1 – Central and Urban Chelmsford	
Location 19 – Land West of Patching Hall Lane - Strategic Growth Site Policy 19	
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

289. This site is promoted by a single developer, Bellway Homes. A statement of common ground **(SOCG044)** has been signed with the site promoter. A masterplan framework was submitted as part of the SHELAA submission in 2022. The Council is expecting this masterplan to be updated in accordance with the requirement of the site policy.

290. The current planning status for this site is summarised in the table set out below (where a planning application is submitted the housing/employment 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
Strategic Growth Site Policy 19	No	No	200	0

291. 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

292. The Local Plan policy for Strategic Growth Site 19 states that around 200 new homes of mixed size and type to include affordable housing are to be provided.

293. The capacity for Strategic Growth Site Policy 19 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 5) 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.

294. The final amount 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

295. No non-residential uses are proposed on this site so the question is 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

296. 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 the 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.

297. 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)).

298. 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

299. 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.

300. 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.

301. Strategic Growth Site 19 is expected to be delivered from 2028 onwards. 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 **(SOCG044).**

302. 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

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

304. 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.

Qi	**What is the likely impact of the proposed allocation on the following factors:** • **Rural landscape character, agricultural land and heritage assets** • **Biodiversity and green infrastructure,** • **The strategic and local highway network** • **Other infrastructure including public transport, education, health, utilities and recreation;** • **Flood risk and prevention** • **Air quality, light and noise pollution**

CCC Response to Qi

Rural landscape character

305. The Additional Sites - Landscape Sensitivity and Capacity Study October 2025 **(PL013)** (page 24-30, PDF page 35-41)) 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 low rise residential development due to its relationship with the settlement edge Guidelines are included for retain/reinstating of existing hedgerows, and implementing a green buffer to the built edge of development and maintain the PRoW. 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.

Agricultural Land

306. Strategic Growth Site 19 is 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 62, PDF page 62)). 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 11-12, PDF page 78)). 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.

307. 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).

Heritage assets

308. 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 9.0, PDF page 19), which identifies a collection of designated and non-designated heritage assets namely the listed buildings at Priors, a large mid-sixteenth century house partly enclosed by a moat, a terrace of early nineteenth century cottages at 141 to 145 Patching Hall Lane, a pair of traditional cottages at 147-149 Patching Hall Lane. The principles for heritage assets and their settings are set out on PDF page 20, and were used to inform the heritage requirements for the site policy.

Biodiversity and green infrastructure

309. The site policy requirements for the natural environment will ensure the development retains and enhances existing natural landscaping and trees in and on the boundary of the site. 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 existing 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 an ancient woodland, it concludes that the mitigation measures provided in the site policy are appropriate Appendix C (page 12 (PDF page 78)).

The strategic and local highway network, public transport

310. 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).

311. The cumulative impact of additional plan sites on the road network in north-west Chelmsford – including at the junction of Patching Hall Lane and Broomfield Road is documented in evidence base report **(T007)** (page 24).

312. 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 Site 19 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).

Education

313. 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).**

Health

314. The potential impact of the Local Plan on health provision is assessed through the Infrastructure Delivery Plan (IDP) **(INF012** and as updated in **INF012-A, Location 1).** 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 150) and incorporated into the site policy requirements.

Utilities

315. 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.

316. 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)).

317. 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).**

318. 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.

319. 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.

Recreation

320. The potential impact of the Local Plan on recreation is assessed through the Infrastructure Delivery Plan (IDP) **(INF012** and as updated in **INF012-A, Location 1).** 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.

Flood Risk

321. A small section of the site (1%) is at risk of surface water flooding, but overall risk of flooding from all sources is low. This is evidenced in the Additional Sites Sequential and Exception Test 2025 **(C0019,** 34-35, pdf pages 35-36**)**. Prevention of flood risk would be achieved through site layout planning to ensure that more vulnerable land uses, such as residential, are located towards lowest risk and in this instance away from surface water flooding. **CC019** confirms that this is feasible.

Air quality

322. 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)).

Light and noise pollution

323. 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)).

Qj	**What mitigation measures would be necessary to ensure a sustainable form of development, and are they clearly set out?**

CCC Response to Qj

324. It is the Council's position that the mitigation measures are necessary and justified to ensure a sustainable form of development. The requirements for the 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 the development to preserve and where appropriate enhance the setting of the listed buildings at Priors and 141 to 145 Patching Hall Lane, and the non-designated assets at 147-149 Patching Hall Lane.

Biodiversity impacts – historic and natural environment site policy requirements which require a network of multifunctional green infrastructure to be created and ensure appropriate habitat mitigation and creation is provided

Highways impacts – design and layout, movement and access and site infrastructure site policy requirements which require safe and convenient pedestrian and cycle connections, appropriate improvements to the local and strategic road network, and measures to promote and enhance active and sustainable modes of transport.

325. 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.

326. ECC, as the Highway Authority, seeks early pre-application discussion with developers and/or land promotors 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.

327. The developer has engaged in pre-application advice with the Essex Highways regarding the scope of assessment for the development, in terms of capacity and safety impacts, as well as the assessing access to all other modes of sustainable travel. The developer will be expected to provide suitable improvements/upgrades, as is deemed necessary and proportionate, for active travel and public transport, including any highway works, if any specific capacity issues are identified as part of the review of a full Transport Assessment and Travel Plan submission.

328. 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.

329. 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.

Qk	**What are the main infrastructure requirements for the site, how were they identified, and how and when will they be delivered?**

CCC Response to Qk

330. The Policy sets out clear the required site infrastructure requirements. This includes appropriate improvements to the local and strategic road network, measures to promote and enhance active and sustainable modes of transport, new and enhanced cycle routes, footpaths, Public Rights of Way and, where appropriate, bridleways and providing, or make financial contributions to new or enhanced sport, leisure and recreation facilities. A number of financial contributions are sought towards primary, secondary, early years education and childcare, as required by the Local Education Authority, other community facilities including healthcare provision as required by the

NHS Mid and South Essex Integrated Care Board and police, ambulance and fire and rescue facilities.

331. 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.

332. These infrastructure requirements align with the Infrastructure Delivery Plan (IDP) **(INF012)** (page A-35-A37 (PDF page 184-186)) expectations for Strategic Growth Site 19, ensuring that development is supported by proportionate S106-funded contributions and on-site provision. This covers essential education capacity (early years, primary and secondary), green infrastructure and recreational space, and sport and leisure facilities, alongside place-making elements such as public art. The approach reflects a policy requirement for development to mitigate its impacts by funding or delivering necessary transport, community, and social infrastructure, with costs largely met by the developer and no identified funding gap. The IDP clearly sets out the anticipated delivery mechanism.

EVIDENCE BASE LIST FOR MATTER 6	
SD001	Pre Submission (Regulation 19) Local Plan Consultation Document
SD002	Focused Consultation Additional Sites (Regulation 19) Document 2025
SD003	Regulation 22 Consultation Statement June 2026
SD004	Statement of Co-operation June 2026
SD005	Schedule of Proposed Modifications June 2026
SD008	Pre-Submission Integrated Impact Assessment January 2025
SD009	Additional Sites Integrated Impact Assessment
TP010	Spatial Strategy and Strategic Sites Submission Topic Paper 2026
PL009	Archaeological Impact Assessment
PL012	Urban Area and Defined Settlement Boundary Review Technical Note October 2025
PL013	Additional Sites - Landscape Sensitivity and Capacity Study October 2025
PL014	Additional Sites Heritage Assessments
PL018	Additional Housing Site Studies, October 2025
PL020	Chelmer Waterside Development Framework October 2021
PL021	Chelmsford Plan for Improving Rivers and Waterways in and around Chelmsford
PL033-A	Revised Masterplan and Planning Brief Procedure (October 2026)
LDS011	The Five Year Housing Land Supply Methodology (April 2026)
LDS012	Five Year Housing Site Schedule April 2026
LDS015	Housing Windfall Assessment April 2026
LDS024	Five-Year Housing Land Supply Methodology Practice Note May 2026
AH002	Housing Capacity in Chelmsford City Centre and Urban Area 2024
ECON001	Retail Capacity Study Update
OSP015	Adopted Chelmsford Local Plan
BG003-B	Open Space Study December 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	Infrastructure Delivery Plan
INF012-A	Post Consultation Amendments to IDP in Response to MIQs
INF015	2024 Developers' Guide
CC014	Review of the Chelmsford Local Plan Air Quality Impact Assessment December 2024
CC016	Additional Sites – Review of the Air Quality Impact Assessment September 2025
CC017	Water Cycle Study Addendum

EVIDENCE BASE LIST FOR MATTER 6	
CC018	Level 2 Strategic Flood Risk Assessment: Addendum October 2025
CC019	Additional Sequential and Exception Test October 2025
SOCG015	Statement of Common Ground with CHP March 2026
SOCG019	Statement of Common Ground with Anglian Water
SOCG029	Statement of Common Ground with Dandara (GS18a)
SOCG041	Statement of Common Ground with Essex and Suffolk Water April 2026
SOCG044	Statement of Common Ground with Bellway Homes Ltd (SGS19) April 2026
T006-A	Transport Impact Appraisal of Local Plan Review Pre-Submission
T007	Additional Sites (Reg 19) Highways Impact Junction Modelling Appraisal
T012	Chelmsford Local Cycling and Walking Infrastructure Plan September 2024
PL047	Small Sites Planning Briefs/Concept Frameworks 2024
PL049	East Chelmsford (Manor Farm) Masterplan
PL050	East Chelmsford (Maldon Road) Masterplan



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