

Chelmsford Local Plan Review 2022 – 2041

Examination

Inspectors – Mr H Baugh-Jones BA(Hons) DipLA MA CMLI

Mrs R Morgan BSc(Hons) MCD MRTPI

Programme Officer – Mrs Annette Feeney

Annette.FEENEY@chelmsford.gov.uk

MATTERS, ISSUES AND QUESTIONS (MIQs)

Important: these Matters, Issues and Questions should be read in conjunction with the Inspector's Examination Guidance Note.

References in brackets () are to the document references in the Examination Library, which can be found on the Examination website:

www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-local-plan/local-plan-review/

MATTER 1: LEGAL AND PROCEDURAL REQUIREMENTS

Issue 1 – Whether the Plan has been informed by a Sustainability Appraisal

- 1.1 Is it clear how the preparation of the Plan and its policies have been informed by the Sustainability Appraisal (Integrated Impact Assessment January 2025 (SD008) and Integrated Impact Assessment: Additional Sites (Regulation 19) Addendum November 2025 (SD009)) at each stage and how mitigation measures have been dealt with?
- 1.2 Do the Sustainability Appraisals robustly test the Plan against reasonable alternatives for the allocated sites for housing, employment and retail and other types of development?
- 1.3 What alternative options were considered, which were discounted and were the reasons for this clear?

Issue 2 – Whether the Plan has been prepared in compliance with other legal requirements

- 1.4 How were the Habitats Regulations Assessment (December 2024) and the Habitats Regulations Assessment: Focussed Consultation Additional Sites Addendum (November 2025) carried out and was the methodology appropriate? Do they meet the requirements of the Conservation of Habitats and Species Regulations 2017 and reflect relevant case law?

- 1.5 What relevant designated sites were considered? What potential impacts of the Plan were factored in?
- 1.6 What were the overall conclusions of the HRA documents and how have these conclusions informed the Plan's preparation?
- 1.7 How and when has Natural England been involved in the HRA process and have their concerns been satisfactorily resolved? Are changes needed to Strategic Policies S4 and S9 in response to comments from Natural England?
- 1.8 Further to the HRA Addendum August 2025 (Appendix 2 of the Statement of Common Ground with Natural England), is additional clarification within the HRA needed regarding the Plan's approach to project level mitigation for some developments?
- 1.9 Has the Plan been prepared in accordance with the scope, timescale and content set out in the submitted Local Development Scheme (SD018)?
- 1.10 Has consultation been carried out in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's Statement of Community Involvement (SD019)?
- 1.11 Does the Plan include policies designed to ensure that the development and use of land contributes to the mitigation of, and adaption to, climate change in accordance with the legislation?¹
- 1.12 In what ways has Plan preparation and the Plan's content had regard to the aims expressed in S149 of the Equality Act 2010 in relation to those who have a relevant protected characteristic?
- 1.13 Has the preparation of the Plan complied with the Planning and Compulsory Purchase Act 2004 (as amended) Part 2 and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) in all other respects, including in terms of
- i. Having regard to the Planning Practice Guidance² that the preparation of the Plan should take into account policies and proposals in Neighbourhood Plans;
 - ii. Making clear which policies will be superseded if the Plan is adopted.
- 1.14 What is the up-to-date position with Neighbourhood Plan preparation in the District?

¹ Section 19(1A) of the Planning and Compulsory Purchase Act (2004) (as amended)

² PPG Reference ID 61-006-20190723

- 1.15 Has Plan preparation had regard to the additional matters set out in Section 19 of the 2004 Act and in Regulation 10 of the 2012 Regulations?

MATTER 2: MAINTAINING EFFECTIVE COOPERATION

Issue 1 – Has the Council maintained effective co-operation with relevant local authorities and other bodies on strategic cross boundary matters in preparing the Plan in line with national policy?

- 2.1 Has the Council maintained effective and on-going joint working with the relevant authorities on the strategic matter of meeting identified local housing needs? If so, is this demonstrated in one or more statements of common ground (SoCG), in accordance with the expectations in national policy?
- 2.2 Does the Plan give rise to any other strategic cross-boundary matters requiring effective co-operation? If so, what evidence is there in the form of SoCGs to demonstrate that the Council has maintained effective co-operation with the relevant authorities and statutory bodies on these matters?

MATTER 3: STRATEGIC PRIORITIES, DEVELOPMENT REQUIREMENTS AND SPATIAL PRINCIPLES

Issue 1 – Whether the Plan will be effective in addressing the Strategic Priorities for the climate, growth and place

- 3.1 Do the Strategic Priorities (climate; growth; and place) provide a sound basis on which to underpin the strategic policies in the Plan in order to deliver its vision?
- 3.2 The Plan period is 2022 to 2041. What is the Council's anticipated date of adoption? Would the strategic policies of the Plan look ahead over a minimum of 15 years from adoption as required paragraph 22 of the National Planning Policy Framework (the Framework)? Is the approach justified, effective and consistent with national policy?

Issue 2 – Spatial Principles

Strategic Policy S1

- 3.3 Does the policy provide the right approach to the distribution of development?
- 3.4 Does it provide a clear set of spatial principles that are in accordance with national policy including in relation to the Green Belt?
- 3.5 Is the Policy sufficiently robust to secure the objective of developing previously developed land?
- 3.6 Does it provide flexibility to achieve sustainable development through a range of site types and sizes?

- 3.7 Is the Policy approach effective and justified in addressing speculative development proposals?
- 3.8 Will the policy be effective in meeting the needs of Chelmsford and accommodating unmet need from neighbouring authorities?
- 3.9 Will the Policy be effective in addressing any identified additional housing needs?

Issue 3 – Whether the Plan makes adequate provision for housing

Strategic Policy S6

The Council has set out in its answer to our Initial question on housing need, the reasons it has used to justify the housing requirement figure of 1,210 dwellings per annum (dpa). That justification is, in part, based around the transitional arrangements in the Framework. In February 2022, the Council declared a housing crisis in Chelmsford.

- 3.10 Is the housing requirement of 1,210 dpa justified, evidence-based and consistent with national policy?
- 3.11 Do the potential implications of using the higher Standard Method figure justify the lower figure in Policy S6?
- 3.12 Are there any risks to the delivery of housing as a result of the supply buffer?
- 3.13 Are there particular constraints to identifying additional sites within the Plan period in the event of housing and employment development not coming forward as envisaged?
- 3.14 Is the Plan consistent with national policy in relation to housing developments on sites no larger than one hectare?
- 3.15 Is there robust evidence to demonstrate that unmet need from neighbouring authorities cannot be accommodated in Chelmsford? What discussions have taken place with neighbouring authorities?
- 3.16 Does the Plan provide a robust approach to the provision of sites for Gypsies and Travellers and Travelling Showpeople in accordance with national policy?

Issue 4 – The Spatial Strategy

Strategic Policy S7

The overriding strategy in the Plan is to first make use of previously developed land within Chelmsford Urban Area and then to allocate land for development in:

- a. Sustainable Urban Extensions (SUEs)
- b. two new garden communities, underpinned by Garden City Principles
- c. expansion of existing established employment sites

3.17 Is this approach justified, soundly based and consistent with national policy?

3.18 Given the Plan's reliance on meeting development needs in the SUEs and new garden communities and taking into account their scale, is there sufficient flexibility and resilience built into the Plan to deliver the housing growth envisaged, in the event of any underperformance of these allocations?

3.19 What alternative approaches were tested in the preparation of the Plan?

Strategic Policy S8

3.20 Does the Plan provide sufficient flexibility to respond to changes to future logistics and economic growth?

3.21 Is the evidence underpinning the employment requirement justified and consistent with national policy?

MATTER 4: INFRASTRUCTURE AND TRANSPORT

Issue 1 – Whether the planned infrastructure aligns with the planned housing and economic growth

In response to our initial questions, the Council provided a suite of answers in relation to a number of issues including those related to the cancelled A12 widening scheme and the Chelmsford North East Bypass. Nevertheless, for the benefit of representors:

4.1 Are there any consequences for the delivery of housing arising from the cancelling of the A12 widening scheme?

4.2 There is currently no confirmed delivery timescale for sections 1b and 2 of the Chelmsford North East Bypass. Are there any consequences arising from this for the delivery of housing?

- 4.3 Will the proposed improvements at Junction 19 of the A12 set out in the Beaulieu Access Package, be sufficient to deliver the strategic growth in the Plan and achieve sustainable/active travel requirements?

Strategic Policies S9, S10 and S16

- 4.4 Does the Infrastructure Delivery Plan March 2025 (INF012) contain the full range of infrastructure to support planned growth and how will it be kept up to date?
- 4.5 Do the costs and funding/delivery sources in the Infrastructure Delivery Schedules (INF012 Appendix A) align with those of key service and infrastructure providers?
- 4.6 Will Strategic Policy S9 be effective in securing new and improved infrastructure and are modifications necessary for soundness?
- 4.7 Is Strategic Policy S16 sufficiently clear in what it requires new development of varying sizes to provide? Will it be effective in achieving its objectives?
- 4.8 Will the practical application of Policy S16 be effective? Are main modifications necessary for soundness?
- 4.9 Does the Plan provide sufficient flexibility of delivery mechanisms for necessary infrastructure. What is the role of the Community Infrastructure Levy (CIL) and s106 in that delivery?
- 4.10 Are there potential cumulative effects from the various mechanisms for placemaking, transport and financial contributions through s106 planning obligations and CIL that might affect the delivery of Site 16a East Chelmsford Garden Community? Is the approach to these costs justified and soundly based?
- 4.11 The Local Plan Review Infrastructure Topic Paper (TP016) refers to a Draft Planning Obligations SPD 2026. What is the current status of the Draft SPD and does it supersede the January 2026 version?

Issue 2 – Transport

- 4.12 Do the Transport Impact Appraisals December 2024 (T006) and October 2025 (T007) provide a clear picture of the effects of housing and economic growth on the transport network and the mitigation required?
- 4.13 Will the timescale for the delivery of the Beaulieu Access Package align with the timescale for the delivery of the Chelmsford Garden Community?

- 4.14 How will the Plan achieve the aims of the three Strategic Zonal Focuses developed by Essex County Council?
- 4.15 How will localised cross boundary/cumulative impacts be assessed and how will mitigations be delivered?

MATTER 5: SECURING THE RIGHT TYPE OF HOMES

Issue 1 – Whether the Plan will provide for the right mix of housing

Policy DM1 – Size and Type of Housing

- 5.1 Does the housing mix set out in the policy fully reflect local needs and market conditions?
- 5.2 Is the policy soundly based in terms of percentage requirements and will it be effective in ensuring the delivery of a mix of housing in accordance with national policy?
- 5.3 Are the housing mix requirements justified by the Strategic Housing Needs Assessment (SHNA)?
- 5.4 Is the requirement for 5% of affordable dwellings to be built to meet the requirements of Part M of the Building Regulations 2010 (as amended) justified and soundly based. Will this requirement be effective in delivering that type of housing?
- 5.5 Do the housing mix and accessibility requirements strike an acceptable balance between meeting assessed needs and allowing the development industry appropriate flexibility?

Policy DM2 – Affordable Housing and Rural Exception Sites

- 5.6 Is the 35% affordable housing requirement on sites comprising 10 or more residential units or with a site area of 0.5 hectares or more justified and soundly based. Will it be effective in securing the delivery of affordable housing on all sites to which it applies?
- 5.7 Is the approach to Rural Exception Sites justified, soundly based and consistent with national policy?

Policy DM3 – Gypsies, Travellers and Travelling Showpeople

- 5.8 Are the allocations in the Plan justified, soundly based and consistent with national policy? Will the allocations meet identified accommodation needs?
- 5.9 Is the windfall policy justified and soundly based? How will it operate in practice? Can windfall sites be relied upon to meet future needs?
- 5.10 Is the identified need capable of being met during the Plan period?

MATTER 6: SITE SLECTION

Site assessment and selection

- 6.1 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?

Issue 1 – Site allocations

General site allocation matters

- 6.2 Is the approach of requiring masterplans/planning briefs an effective mechanism to secure sustainable development across the plan area?

Note – the following question applies to each of the proposed allocations listed in the table below. The Council is requested to respond to all of the questions put and in doing so, should also address the site-specific questions in the table, where relevant.

Representors should respond to those questions relevant to the representations they made at the Regulation 19 consultation stage (Pre-Submission consultation in February 2025 and Focused consultation on additional sites in November 2025).

- 6.3 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?
- 6.4 For the housing sites, what is the basis for the proposed capacity?
- 6.5 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?
- 6.6 Are the development requirements clear, and are any further safeguards or mitigation measures necessary to achieve an acceptable form of development?
- 6.7 What is the expected timescale and rate of development for the housing sites and is this realistic?
- 6.8 Are any modifications to the site policy needed for soundness?

Site specific questions

Growth Area 1 – Central and Urban Chelmsford

Location 1
Strategic Growth Site Policy 1a – Chelmer Waterside (sites CW1a and CW1c-CW1f)
a. How will the Council ensure a comprehensive approach to site and infrastructure delivery across the Chelmer Waterside sites? b. 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? c. Are requirements for flood risk management and mitigation clearly set out in the policy and supporting text? d. Is it clear what is meant by ‘abundant’ street and tree planting? How does this relate to the requirements in policy DM17?
Strategic Growth Site Policy 1w - Meadows Shopping Centre and Meadows Surface Car Park
e. Why does the April 2026 Housing Site Schedule show a significantly reduced capacity for this site, and should this be reflected in the policy? f. Is there evidence that the site is available and capable of being delivered within the plan period? g. 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 site delivery in the timeframes and capacity envisaged? h. What is the justification for the three replacement bridges required by the policy, and can they be viably provided as part of the development?
Strategic Growth Site Policy 1b - Former St Peter’s College, Fox Crescent
i. Would the development of SGS1b be consistent with the requirements for open space contained in paragraph 99 of the 2023 Framework? j. Are changes needed to the Policies Map to show areas designated as open space?

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?
Strategic Growth Site Policy 1d – Riverside Ice and Leisure Land
No additional questions
Strategic Growth Site Policy 1e – Civic Centre land, Fairfield Road
No additional questions
Strategic Growth Site Policy 1f – Eastwood House Car Park, Glebe Road
No additional questions
Strategic Growth Site Policy 1y – Land between Hoffmanns Way and Brook St
l. Should Policy 1y be modified to require an archaeological assessment?
Strategic Growth Site Policy 1cc – Andrews Place, Land west of Rainsford Lane
m. What is the justification for the required 100% affordable housing? Would an element of market housing be acceptable on the site?
Policy GS1 – Growth sites in Chelmsford City Centre/Urban Area (sites 1g – 1bb)
No additional questions
Strategic Growth Site Policy 1dd – Land at former Kay-Metzeler Premises, Brook Street
No additional questions
Location 2 - West Chelmsford - Strategic Growth Site Policy 2
No additional questions
Location 3 - East of Chelmsford - Strategic Growth Site Policies 3a - 3d Policy SPA5 – Sandford Mill Special Policy Area
a. For site SGS3a, is the proposed scale of development justified, having regard to any constraints and the provision of necessary infrastructure?

- b. For SGS 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?
- c. 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?
- d. Is there evidence that sites 3b, 3c and 3d are available and capable of being delivered within the plan period?

Location 4 - Land North of Galleywood - Growth Site Policy 4

- e. Should GS Policy 4 be deleted from the plan following completion of the site?

Location 5 – Writtle - Growth Site Policy 5

No additional questions

Location 18 – North West Chelmsford - Strategic Growth Site Policy 18a

- 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
- g. What mitigation measures would be necessary to ensure a sustainable form of development, and are they clearly set out?
- h. What are the main infrastructure requirements for the site, how were they identified, and how and when will they be delivered?

Location 19 – Land West of Patching Hall Lane - Strategic Growth Site Policy 19

- i. 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

- j. What mitigation measures would be necessary to ensure a sustainable form of development, and are they clearly set out?
- k. What are the main infrastructure requirements for the site, how were they identified, and how and when will they be delivered?

Growth Area 2 – North Chelmsford

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

- a. What is the current planning status of the site, including progress with masterplans and required infrastructure delivery?
- b. What is the basis for the increase in capacity from around 3,000 homes and 45,000sqm of new office/business floorspace in the adopted plan, to around 5,569 new homes and around 9 hectares of employment land in the submitted plan?
- c. What is the basis for the required Gypsy and Traveller site for 10 serviced pitches?
- d. What evidence has been used to assess the impact of development at the capacity now proposed on the following:
- Rural landscape character, agricultural land and heritage assets
 - Biodiversity and green infrastructure,
 - Other infrastructure including education, health, utilities and recreation;
 - Flood risk and prevention
 - Air quality, light and noise pollution
- e. What mitigation measures are necessary to ensure the development is acceptable, and is that clearly set out?
- f. Has it been satisfactorily demonstrated that the allocation can be delivered without causing severe impacts on the strategic and local highway network? Is further work needed, and if so how and when will this be carried out?
- g. Has funding for the Beaulieu Access Package been secured? What are the timescales for its delivery, and how does this fit in with the proposed development trajectory for SGS6?

- h. What is the basis for the requirement to enable a 60% share in active and sustainable travel? Is that realistic? What would be the implications of not achieving the 60% share?
- i. Are the other infrastructure requirements set out in the policy (including education provision, community facilities, open space etc) justified and proportionate for the scale of development proposed? Can they be viably provided?
- j. Is the proposed delivery trajectory realistic, having regard to identified transportation and other infrastructure requirements?
- k. Are modifications needed to the policy to ensure an acceptable form of development?

(Note – questions about biodiversity net gain requirements are covered under Strategic Policy S4 and Policy DM16)

Location 7 – Great Leighs - Strategic Growth Site Policies 7a - 7c

- l. For site 7b, what is the basis for the proposed increase in overall capacity, and the reduction in the requirement for older persons housing on site 7b (reduced from 250 to 190)?
- m. What should the site capacity be for site 7c? What is the reason for the proposed increase in site density, and what would be the impact for the site layout and provision of on site infrastructure?
- n. How will the three sites be developed in a comprehensive manner, to ensure that necessary infrastructure is provided?
- o. What education requirements would arise from the proposed development at Great Leighs, and how would they be secured and delivered across the three sites? Are any changes needed to the Location 7 policies regarding education provision?
- p. What are the implications of required capacity improvements at Great Leighs Water Recycling Centre for delivery of the three sites? Are they capable of being installed within the necessary timescales?
- q. Are changes to policy wording required to ensure that development does not impact defence operations or assets?

Location 8 – North of Broomfield - Strategic Growth Site Policy 8

No additional questions

Location 9 – Boreham
Strategic Growth Site Policy 9a - Waltham Road Employment Area
r. What is the likely impact of the proposed allocation on the following factors: • The strategic and local highway network including public transport and active travel • Agricultural land quality, landscape character and heritage assets • Biodiversity • Flood risk • Air quality, noise and light pollution • Utilities s. What mitigation measures would be needed to ensure a sustainable form of development, and are they clearly set out in the policy? t. Is the proposed scale of development justified, having regard to any constraints and the provision of necessary infrastructure? u. Are changes to policy wording required to ensure that development does not impact defence operations or assets?
Growth Site Policy 9b – Land to the East of 118-124 Plantation Road and Growth Site Policy 9c – South of Main Road and Dukes Wood Close, Boreham
v. Would the proposed sites provide a suitable location for older persons housing?
Location 14 – Ford End - Growth Site Policy 14b
w. Is the scale of development proposed consistent with the Spatial Principles and Spatial Strategy set out in Strategic Policies S1 and S7? x. What is the likely impact of the proposed allocation on the following factors: • The strategic and local highway network including public transport and active travel • Agricultural land quality, landscape character, biodiversity and heritage assets • Flood risk, air quality, noise and light pollution • Other infrastructure, including education, health and utilities y. What mitigation measures would be needed to ensure a sustainable form of development, and are they clearly set out in the policy? z. What is the justification for the policy requirement to provide a new community/village hall on site? Do the policy and explanatory text clearly set out what is expected?

Location 15 – North West Chelmsford – Strategic Growth Site Policy 15 – Little Boyton Hall Farm Employment Area
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No additional questions

Growth Area 3 – South and East Chelmsford

Location 16 - East Chelmsford - Strategic Growth Site Policy 16a - East Chelmsford Garden Community (Hammonds Farm)
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Strategic Growth Site Policy 16b - Land adjacent to A12 junction 18 employment area
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| <p>a. How were sites 16a and 16b selected? What alternatives were considered?</p> <p>b. What is the planning status of both sites, including progress with masterplans and required infrastructure?</p> <p>c. What is the basis for the site capacities and supporting development requirements set out in policies 16a and 16b?</p> <p>d. What is the basis for the requirements for two Gypsy and Traveller sites and a Travelling Showpeople site on site 16a? Is this supported by evidence?</p> <p>e. What would be the impact of development of sites 16a and 16b on the strategic and local highway network, including public transport and active travel? How was this assessed? What mitigation measures would be needed to support development, and how would they be funded and delivered?</p> <p>f. To facilitate development of sites 16a and 16b, will further mitigation be required at Junction 19 of the A12, over and above that already being progressed in association with the North East Chelmsford Garden Community?</p> <p>g. For site 16a, what is the basis for the requirement to enable a 60% share in active and sustainable travel? Is that realistic? What would be the implications of not achieving the 60% share?</p> <p>h. What would be the impact of development on sites 16a and 16b on the following:</p> <ul style="list-style-type: none">• Agricultural land, rural landscape character and heritage assets• Biodiversity and green infrastructure• Flood risk and prevention• Air quality, light and noise pollution• Other infrastructure including education, health, utilities and recreation |
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How were the above impacts assessed, and what evidence is the Council relying on?

- i. Are the essential site specific requirements and mitigation measures justified, and will they, along with other policies in the plan, be effective in achieving sustainable development on the sites? Can they be viably provided?
- j. What would be the effect of development of sites 16a and 16b on national policy requirements to ensure a long term supply of minerals?
- k. Is delivery of site 16a, including the required infrastructure and mitigation, achievable within the timescales envisaged in the Plan? How will the timely provision of infrastructure be ensured?
- l. Are any modifications to the policies for sites 16a and 16b needed to ensure an acceptable form of development is achieved?

(Note – questions about biodiversity net gain requirements are covered under Strategic Policy S4 and Policy DM16)

Location 10 – North of South Woodham Ferrers – Strategic Growth Site Policy 10

- m. What is the likely impact of the proposed allocation on the following factors:
 - The strategic and local highway network, including public transport and active travel
 - Agricultural land quality, landscape character and heritage assets
 - Biodiversity and green infrastructure, including European sites
 - Flood risk, air quality, noise and light pollution
 - Other infrastructure, including education, health, recreation and utilitiesHow were the above impacts assessed, and what evidence is the Council relying on?
- n. Are the essential site specific requirements and mitigation measures justified, and will they, along with other policies in the plan, be effective in achieving sustainable development on the site?

Location 11 – Bicknacre – Growth Site Policy 11b and Strategic Growth Site Policy 11c

- o. What is the likely impact of the proposed allocations, in particular SGS 11c, on the following factors:
 - The strategic and local highway network including public transport and active travel
 - Agricultural land quality, landscape character, biodiversity and heritage assets

- Flood risk, air quality, noise and light pollution
 - Other infrastructure, including education, health, recreation and utilities
- How were the above impacts assessed, and what evidence is the Council relying on?

- p. Are the essential site specific requirements and mitigation measures justified, and will they, along with other policies in the plan, be effective in achieving sustainable development on the sites?
- q. Are changes to policy wording required to ensure that development does not impact defence operations or assets?

Location 12 – St Giles, Bicknacre – Growth Site Policy 12

No additional questions

Location 13 – Danbury - Strategic Growth Site Policy 13

- r. Are changes to policy wording required to ensure that development does not impact defence operations or assets?

Location 17 – East Hanningfield – Growth Site Policies 17a, 17b and 17e, Strategic Growth Site Policies 17c and 17d

- s. Does the quantum of development proposed in sites 17a-17e, both individually and cumulatively, accord with the Spatial Principles and Spatial Strategy set out in Strategic Policies S1 and S7?
- t. What is the likely impact of the proposed allocations, including the cumulative impact, on the following factors:
- The strategic and local highway network including public transport and active travel
 - Agricultural land quality, landscape character, biodiversity and heritage assets
 - Flood risk, air quality, noise and light pollution
 - Other infrastructure, including education, health, recreation and utilities
- How were the above impacts assessed, and what evidence is the Council relying on?
- u. Are the essential site specific requirements and mitigation measures justified, and will they, along with other policies in the plan, be effective in achieving sustainable development on the sites?
- v. Can required capacity increases in wastewater treatment and disposal be provided to support development in East Hanningfield within the timescales set out?

Location 20 – Rettendon Place – Strategic Growth Site Policy 20
w. Does the quantum of development proposed in SGS Policy 20 accord with the Spatial Principles and Spatial Strategy set out in Strategic Policies S1 and S7? x. What is the likely impact of the proposed allocation on the following factors: • The strategic and local highway network including public transport and active travel • Agricultural land quality, landscape character, biodiversity and heritage assets • Flood risk, air quality, noise and light pollution • Other infrastructure, including education, health, recreation and utilities How were the above impacts assessed, and what evidence is the Council relying on? y. Are the essential site specific requirements and mitigation measures justified, and will they, along with other policies in the plan, be effective in achieving sustainable development on the site? z. Can required capacity increases in wastewater treatment and disposal be provided to support development within the timescales set out?
Location 21 – Woodham Ferrers – Growth Site Policy 21a
aa. Is Woodham Ferrers a sustainable location for the development proposed? Does the quantum of development proposed accord with the Spatial Principles and Spatial Strategy set out in Strategic Policies S1 and S7? bb. What is the likely impact of the proposed allocation on infrastructure including education, health, utilities and local transport? cc. Are the essential site specific requirements and mitigation measures justified, and will they, along with other policies in the plan, be effective in achieving sustainable development on the site? dd. Can required capacity increases in wastewater treatment and disposal be provided to support development within the timescales set out?

MATTER 7: CITY, TOWN AND NEIGHBOURHOOD CENTRES AND COMMUNITY FACILITIES

Issue 1 – Whether the Plan will contribute to the vitality and viability of City, Town, and Neighbourhood Centres

Policy S12 – Role of City, Town and Neighbourhood Centres

- 7.1 Is the retail hierarchy and network of centres informed by up-to-date evidence?
- 7.2 Does the Plan provide for access to the various centres by sustainable and active travel modes?
- 7.3 Will the Policy be effective in responding to changing retail and Market conditions?
- 7.4 Overall, does the Plan set out a positively prepared, justified and effective mechanism to support the economy and the vitality and viability of the City, Town and Neighbourhood Centres? Are any modifications necessary for soundness?

Policy S17 – Future of Chelmsford City Centre

- 7.5 Is the proposed regeneration framework for the City Centre justifiable and deliverable?
- 7.6 Are modifications necessary for soundness?

Policy DM4 – Employment Areas and Rural Employment Areas

- 7.7 Does the Policy strike an appropriate balance between protecting employment land and allowing for changing economic circumstances?

Issue 2 – Is the approach to delivering and protecting community facilities justified and effective?

Policy S5 – Protecting and Enhancing Community Assets

- 7.8 Is the approach to protecting and enhancing community facilities justified and effective?
- 7.9 For soundness, should *fire and rescue* be added to the list of community assets in the policy and paragraph 5.58?

Policy DM20 – Delivering Community Facilities

- 7.10 Should part i. of Policy DM20 be amended to refer to existing or proposed public transport, cycling and walking links? How would any proposed links be secured?
- 7.11 Are changes to the policy and paragraph 8.178 needed to facilitate the flexible/shared use of new community facilities?

Policy DM21 – Protecting Community Facilities

- 7.12 For the purposes of Policy DM21, what would be the basis for deciding whether a commercial use would constitute a 'locally valued community facility'?
- 7.13 What is the basis for the inclusion of livery yards in the policy, and the specific requirements for those particular uses contained in paragraph 8.186?

Policy DM22 – Education Establishments

- 7.14 In the last sentence of Policy DM22, what is the justification for requiring proposals for the expansion of Anglia Ruskin University to be considered in the context of agreed masterplans?
- 7.15 Is the proposed additional text in paragraph 8.190, relating to redevelopment of school sites, needed to make the policy effective?
- 7.16 Are any other modifications to Strategic Policy S5 or Policies DM20-22 needed for soundness?

MATTER 8: CREATING SUSTAINABLE DEVELOPMENT

Issue 1 – Does the plan set out positively prepared policies relating to climate change and flood risk which are justified, effective and consistent with national policy?

Strategic Policy S2 – Addressing Climate Change and Flood Risk

Policy DM19 – Renewable and Low Carbon Energy

Policy DM25 – Sustainable Buildings

Policy DM31 – Net Zero Carbon Development (In Operation)

Policy DM18 – Flooding/SUDS

- 8.1 Is the approach to addressing climate change effective and justified? Is it consistent with national policy and the objectives and provisions of the Climate Change Act 2008?

- 8.2 In the last sentence of Policy DM19, what is the basis for the requirement that major renewable and low carbon energy proposals should include a package of community benefits? Is this justified, and is it clear what would be required?
- 8.3 Is the Council's proposed modification to part iii. of the policy, requiring no significant harm to the natural environment, needed for soundness?
- 8.4 What is meant by 'integrated water management techniques' in the context of Strategic Policy S2 and Policy DM25? Is it clearly set out?
- 8.5 In Strategic Policy S2 and Policy DM31, are the requirements for all new buildings to be net zero carbon in operation justified by evidence, fully costed, and consistent with national policy?
- 8.6 In Policy DM31:
- a. Is the use of energy use targets, rather than target emission rates, supported by evidence?
 - b. Are the requirements for different types and scales of development proportionate? Are they clearly set out?
 - c. In relation to Requirement 4 of Policy DM31, what is the basis for limiting on-site renewable energy generation to roof top solar PV energy? Should the policy provide greater flexibility to allow for other forms of renewable energy generation?
 - d. In cases where on-site energy is impractical, is the approach to offsetting via a financial contribution reasonable and supported by evidence?
 - e. Are the requirements for reporting and monitoring clear and proportionate?
 - f. Are any changes or updates to Policy DM31 or its supporting text needed for effectiveness?
- 8.7 In Part A of Policy DM25, is the requirement for all new dwellings to achieve a water efficiency standard of 90 litres/person/day justified and supported by evidence? Should it also apply to changes of use to dwellings?
- 8.8 In Part B of Policy DM25, what is the basis for the specific requirements for Electric Vehicle Charging infrastructure? How do the requirements relate to Building Regulations? Should the requirements for EV charging infrastructure also apply to extensions or changes of use? In the fourth bullet point of Part B, what is meant by 'remaining spaces for residential development'? Is it clearly set out?
- 8.9 In Part C of Policy DM25, what is the basis for the requirement for all new non-residential buildings with a floor area in excess of 500sqm to achieve a minimum BREEAM rating of 'Very Good' and at least three credits under Wat 1 of the Water Consumption measure? Have these requirements been fully costed and are they justified?

- 8.10 Do Strategic Policy S2 and Policy DM18 provide an appropriate framework for dealing with the potential impacts of development on flood risk in all circumstances? Is it justified and consistent with national policy?
- 8.11 Are any other modifications to Strategic Policy S2 or Policies DM18, DM19, DM25 or DM31 needed for soundness?

MATTER 9: CREATING WELL DESIGNED AND ATTRACTIVE PLACES

Issue 1 – Is the Plan’s approach to promoting health and wellbeing justified and effective?

Strategic Policy S14 – Health and Wellbeing

- 9.1 What is the justification for the unit and floorspace thresholds contained in Strategic Policy S14?
- 9.2 What are the Sport England and National Design Guide Active Design principles and how do they differ from other requirements of Strategic Policy S14?
- 9.3 Are any modifications to Strategic Policy S14 needed for soundness?

Issue 2 – Is the approach to high-quality place making justified, effective and consistent with national policy?

Strategic Policy S15 – Creating Successful Places

Policy DM23 – High Quality and Inclusive Design

Policy DM24 – Design and Place Shaping Principles in Major Developments

Policy DM26 – Design Specification for Dwellings

Policy DM27 – Parking Standards

Policy DM28 – Tall Buildings

- 9.4 Are design policies in the plan justified and will they be effective in securing sustainable and high-quality places?
- 9.5 What does Strategic Policy 15 add to the Plan? Is it necessary? If the role of Policy S15 is to address Strategic Priority 7, could it be combined with Strategic Policy S14?
- 9.6 Are the following changes proposed by the Council needed to make Policy DM23 effective?

- a) In Part A of the policy and paragraph 9.9, require that new residential development accords with the standards set out in Appendix B
 - b) In Part B of the policy, clarification that the requirements in Policy DM25 apply to new buildings
 - c) Amend paragraph 9.8 to clarify that uncharacteristically uniform buildings will not be permitted
- 9.7 In the ninth bullet point of Policy DM24, is the addition of the words 'safe and secure' needed for soundness? Is it clear what this would look like in relation to streets and spaces?
- 9.8 Are the requirements for new dwellings in Policy DM26 clearly set out? To improve clarity, should Part B) of the policy be deleted?
- 9.9 In Policy DM 28, is the approach to tall buildings justified and clear?
- 9.10 Are any other modifications to Strategic Policy S15 and Policies DM23-24 and DM26-28 needed for soundness reasons?

Issue 3 – Is the approach to protecting living and working environments justified and effective

Policies DM29 – Protecting Living and Working Environments

Policy DM30 – Contamination and Pollution

- 9.11 In relation to Part B) of Policy DM30, under what circumstances would an air quality impact assessment be required? Is it clear?
- 9.12 Are any modifications to Policies DM29 and DM30 needed for soundness?

MATTER 10: PROTECTING IMPORTANT ASSETS

Issue 1 – Does the Plan set out policies for the protection of the countryside which are justified, effective and consistent with national policy?

Strategic Policy S11 – the Role of the Countryside

Policy DM6 – New Development in the Green Belt

Policy DM7 – New Buildings and Structures in the Green Wedge

Policy DM8 – New Buildings and Structures in the Rural Area

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

Policy DM10 – Change of use (Land and Buildings) and engineering operations

Policy DM11 - Extensions to existing buildings within the Green Belt, Green Wedge and Rural Area

Policy DM12 – Rural and Agricultural/Forestry Workers' Dwellings

- 10.1 Is the approach to new development in the Green Belt consistent with national policy contained in Framework 2023 (which the plan is being examined against), and Framework 2026 (which will be a material consideration in any proposals for development once the Plan is adopted)?
- 10.2 To ensure consistency with national policy, should Part Aii. of Policy DM6 be amended to include burial grounds and allotments? Should it also require that development does not conflict with the purposes of including land within the Green Belt?
- 10.3 In Part B of Policy DM6, would proposals involving affordable housing on previously developed land be subject to an assessment of locational sustainability/accessibility?
- 10.4 What evidence supports the Green Wedge designation and informs Policies S11 and DM7? Is it up to date? Is the approach to identifying and protecting Green Wedges justified and consistent with national policy?
- 10.5 For soundness reasons, should requirements for buildings of exceptional design quality be included in Part A of Policy DM8?
- 10.6 Paragraph 8.121, which follows Policy DM11, explains that parts of the Green Wedge are also within the Green Belt, in which case Green Belt policy will apply. Where the Green Wedge is within the designated Rural Area, proposals will need to conform with both parts B and C of the policy. Does the same principle apply to policies DM9 and DM10? And is that clear?
- 10.7 Are any other modifications to Strategic Policy S11 or Policies DM6 – DM12 needed for soundness reasons?

Issue 2 – Is the approach to the protection and enhancement of the historic environment justified, effective and consistent with national policy?

Strategic Policy S3 – Conserving and Enhancing the Historic Environment

Policy DM13 – Designated Heritage Assets

Policy DM14 – Non-designated Heritage Assets

Policy DM15 – Archaeology

- 10.8 Does the Plan set out a positive strategy for the conservation and enjoyment of the historic environment, consistent with paragraph 196 of the Framework?
- 10.9 Are any modifications to Strategic Policies S3 or Policies DM13 – DM15 needed for soundness?

Issue 3 – Is the approach to the protection and enhancement of the natural environment and biodiversity justified, effective and consistent with national policy?

Strategic Policy S4 – Conserving and enhancing the natural environment

- 10.10 Is the approach to the protection and enhancement of the natural environment and blue and green infrastructure in Strategic Policy S4, consistent with national policy and supported by evidence?
- 10.11 In the first paragraph of Strategic Policy S4, is it clear what is meant by Natural Flood Management?
- 10.12 In the third paragraph of Strategic Policy S4, is the requirement for developers to demonstrate that sufficient waste water treatment capacity is available ahead of occupation, justified and practical in all circumstances? Does this wording allow for situations where additional capacity would need to be made available to facilitate new development?
- 10.13 Is the requirement for the garden community developments to deliver 20% Biodiversity Net Gain (BNG), required by Strategic Policy S4 and Policy DM16, justified and deliverable? Is the 20% BNG figure for the garden communities a minimum requirement or a target? Is this clear and are modifications needed to make the policy effective?
- 10.14 Are any changes to Strategic Policy S4 needed for soundness?

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

- 10.15 In part D) of Policy DM16, what is the justification for requiring measures and features to increase biodiversity to be incorporated into the design of buildings, extensions or renovations? Is it justified and what evidence in the Council relying on? Are there situations where incorporating biodiversity measures would not be appropriate?
- 10.16 Are any changes to Policy DM16 needed for soundness?

Policy DM17 – Trees, Woodland and Landscape Features

- 10.17 In part C) of Policy DM17, what is the basis for requiring three new trees to be planted for each new dwelling? Is it justified and what evidence is the Council relying on?
- 10.18 In relation to proposals for strategic scale employment and infrastructure, how will the requirement for 'significant' tree planting be determined?
- 10.19 Is Policy DM17 clear as to the circumstances when contributions towards off-site tree planting will be acceptable? Is the proposed addition of text in the third paragraph of Part A) of the Policy needed to make the policy effective (ref 280)?
- 10.20 Are any other changes to Policy DM17 needed for soundness?

MATTER 11: MONITORING AND REVIEW

- 11.1 Are the monitoring indicators adequately linked to the Plan's policy objectives and will they enable the Plan to deliver the intended outcomes?
- 11.2 Are the monitoring targets consistent with the Plan's Policy requirements and supporting evidence?
- 11.3 Will the Monitoring framework remain effective over the Plan period? Are there mechanisms in place to ensure the monitoring indicators and targets are based on up-to-date documents over the Plan period?
- 11.4 Is the monitoring framework sufficiently focused on clear outcomes in relation to:
- a. infrastructure provision
 - b. healthy communities
 - c. sustainable development objectives
- 11.5 Overall, will the monitoring indicators and targets provide an appropriate and robust basis for assessing the Plan's delivery?

H Baugh-Jones and R Morgan
INSPECTORS