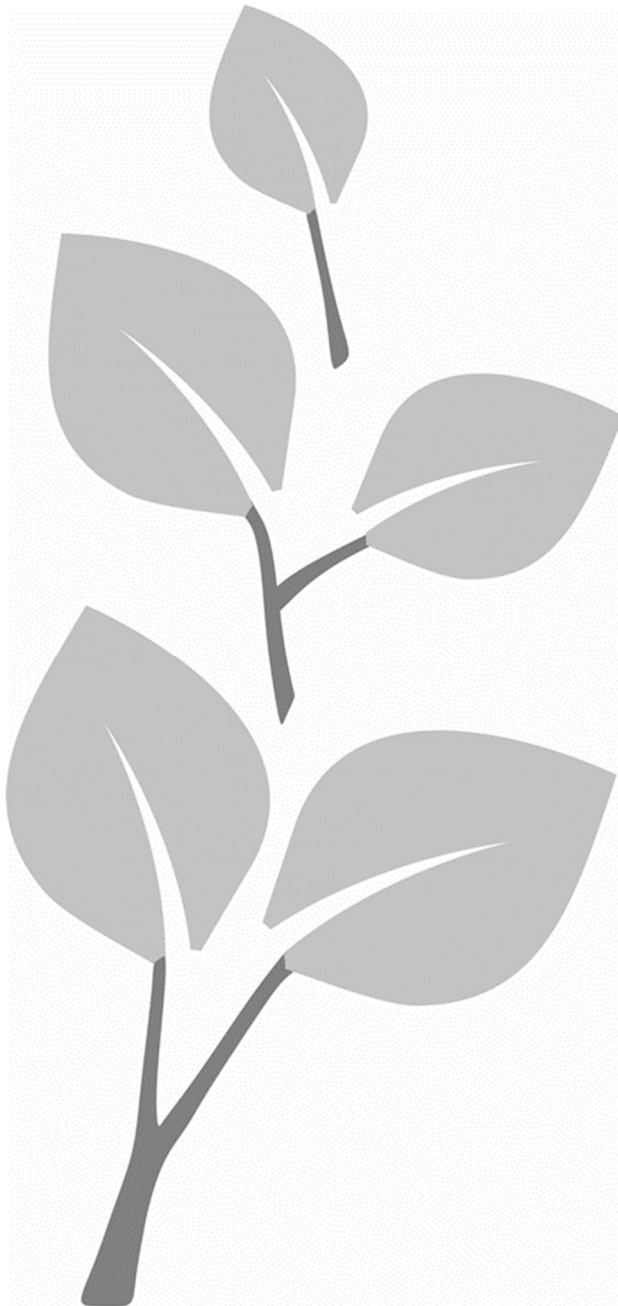


SOCG006



Chelmsford Local Plan

Review of the adopted Local
Plan

Statement of Common Ground
with

Essex County Council

February 2025

Statement of Common Ground Chelmsford City Council and Essex County Council

1. Introduction

Chelmsford City Council (CCC) is currently reviewing the Chelmsford Local Plan adopted in 2020. This is at Regulation 19 (Pre-Submission) stage, following two Regulation 18 consultations on Issues and Options in 2022 and Preferred Options in 2024.

The consultation responses alongside collected evidence and national planning policy and guidance are being used to develop the Pre-Submission Local Plan.

CCC has fully engaged with Essex County Council (ECC) on the development of the Council's review of the adopted Local Plan from the outset with regards its role as:

- Minerals and Waste Planning Authority
- Highway and Transportation Authority
- Lead authority for education (including early years and childcare)
- Lead Local Flood Authority
- Providing and delivering supported and specialist housing (including Adult Social Care) and public health services
- Leading work on climate change and net zero carbon and green and blue infrastructure
- ECC's role as Responsible Authority for the Greater Essex Local Nature Recovery Strategy.

In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, ECC has been formally consulted at both Regulation 18 stages of consultation together with its accompanying Integrated Impact Assessment (IIA). In addition, CCC and ECC have maintained a programme of Duty to Co-operate (DtC) meetings on a six-weekly basis to discuss strategic issues and held joint meetings with National Highways to consider the outputs arising from the transport modelling of the Local Plan being undertaken by ECC and its consultant.

2. Strategic matters

The key strategic matters that may apply to the Local Plan have been identified and set out in [CCC's Duty to Co-operate Strategy](#), as follows:

- Delivering homes for all including Gypsy and Traveller accommodation
- Jobs and economy including green employment and regeneration
- Retail, leisure, and cultural development
- Sustainable transport, highways and active travel
- Climate change action and mitigation including flood risk and zero carbon
- Natural and historic environment including increased biodiversity and green/blue/wild spaces and connectivity of ecological networks
- Community infrastructure including education, health and community facilities
- Utility infrastructure including communications, waste, water and energy
- London Stansted Airport future airspace redesign.

Common Ground

Statements of Common Ground (SoCG) set out how strategic matters or issues of a common nature between a local authority and a statutory body or organisation are being addressed and progressed throughout the plan-making process to provide transparency, and wherever possible, show where parties are working towards areas of agreement.

ECC submitted a large number of detailed and helpful comments in response to the Preferred Options consultation (Regulation 18), on a wide range of issues. A full schedule of all the comments is attached to this statement at Appendix B. The majority of the comments have been actioned within the Pre-Submission Local Plan, including those summarised below:

Support is expressed for a number of areas of the draft Local Plan.

References have been added to Strategic, Site Allocation and Development Management Policies to:

- ensure consistency between Plan policies and adopted site masterplans, subsequent approved and/or planning applications subject to determination and infrastructure schemes
- encourage multifunctional green/blue infrastructure, including its role in water management
- encourage opportunities for active and sustainable travel, for safe and convenient pedestrian and cycle links, connectivity to existing park and ride locations and for bus accessibility within developments and enhancements where relevant to the scale of development
- deliver Biodiversity Net Gain and wider environmental net gain as an important component of nature recovery networks, mitigation and adaptation
- enable opportunities to establish multifunctional green infrastructure along sustainable transport and public rights of way networks

- provide 5G mobile connectivity in relation to utilities provision
- clarify the status of CCC's Infrastructure Delivery Plan, as a 'living document', which informs the draft Local Plan
- support for regional growth sector priorities and clustering of economic activity
- clarify the provision of 60 independent living units to SGS1b
- add building overheating and mitigating associated risks, into Policy S2
- clarify stewardship requirements at North Chelmsford and East Chelmsford Garden Communities
- provide evidence and supporting material including the Essex Design Guide; Safer, Greener, Healthier Campaign; Chelmsford Health and Wellbeing Plan; Essex Local Nature Recovery Strategy and Networks; Local Transport Plan 4 (LTP4); Essex Climate Action Commission: [Net Zero: Making Essex Carbon Neutral](#); Essex Parking Guidance; Livewell Accreditation; A New Development Model for Essex; Developers' Guide for Infrastructure Contributions; Essex Green Infrastructure Strategy and Standards; [Essex, Southend-on-Sea and Thurrock Local Skills Improvement Plan](#); Chelmsford Food Plan.

Clarification has been made in the Strategic, Site Allocation and Development Management Policies to:

- match financial contributions for strategic infrastructure to specific sites, including for the Chelmsford North East Bypass (Section 1A), and the number and type of education facilities (early years and childcare; primary and secondary) at specific strategic sites
- improve connecting routes that align with the Army and Navy Sustainable Transport Package and updates to the scheme timetable, which was granted permission by ECC in December 2024
- provide wording relating to how education facilities are to be provided and the land required
- clarify the connectivity to Chelmer Waterside via a new access road and bridge; Army and Navy Transport Package; and planning agreement upgrades rather than a 'strategic access route'
- the target for water efficiency, which has been changed to a more ambitious target of 90 litres/person/day (and also aligns with representations by Anglian Water...)
- the requirements and process for Health Impact Assessments
- the requirements and terminology for a Mineral Resource Assessment and consideration of their recommendations, Mineral Infrastructure Impact Assessment and Mineral Consultation Area.

Areas of Common Ground

The entries in the table below record comments which have not resulted in a change to the Pre-Submission Local Plan, and the reason why.

Rep Number	Local Plan Reference	Summary of representation	CCC Agreed response
PO24-9756	Para 2.14	(i) add a reference to the growing population of people with disabilities (ii) clarify that the growing and ageing population also covers Chelmsford as part of Central Essex and (iii) to add additional references to sustainable transport opportunities.	The strategic objectives of North and Central Essex authorities are those which have previously been agreed between the Councils, as set out in Para 2.15, namely the 'Memorandum of Co-operation: Collaboration on Strategic Priorities in North and Central Essex' and cannot be amended. No change to the Plan.
PO24-9763	Para 3.39	Provide reassurance that the Preferred Option represents the best option in transport terms.	Outputs of the detailed transport modelling, being undertaken by ECC and its consultant, are being reviewed and the findings will be set out in a Transport Topic Paper to accompany the Pre-Submission Local Plan. No change to the Plan.
PO24-9766	Strategic Policy S1	Recommend an additional principle around integrating strategic green infrastructure with ecological networks and the wider landscape to deliver multiple environmental, social and economic benefits.	Integration of strategic green infrastructure is more appropriately dealt with under strategic policies including S4, S9, S16 and site allocation policies. No change to the Plan.
PO24-9768	Strategic Policy S14	Suggest amendments to provide consistency and links with further guidance.	This is addressed through the Reasoned Justification rather than the upper part of the policy, to provide consistency and links with further guidance. No further change to the Plan.
PO24-9773	Strategic Policy S14	Recommend bullet 8 is amended to require new development to consider providing good access to services and facilities for	This point reflects access to nature for mental wellbeing, rather than detail on

		residents living with or affected by dementia, poor mobility, physical or sensory impairments.	services and facilities which is included in the Reasoned Justification. No change to the Plan.
PO24-9777; PO24-10122	Strategic Policy S14; DM24	ECC recommend an HIA is also required for all development in Use Class C2 (Residential Institutions).	Considered to be covered by the policy, EPOA advice notes, and the Essex Design Guide. No change to the Plan.
PO24-9785	Strategic Policy S6	Suggest the Plan should seek to match employment growth and skills capacity to housing growth to reduce out-commuting.	The policy has been updated to reflect the Employment Land Review Focused Update 2024 which considers the most up-to-date assumptions and data regarding future economic growth prospects. No further change to the Plan.
PO24-9792	Strategic Policy S8	Comments made in relation to an appropriate mix of uses to reflect market need.	The Plan will allow for a range of different employment uses to come forward where appropriate. No change to the Plan.
PO24-9826	Strategic Policy S9	Include a reference to the Chelmer Waterside access bridge, to be consistent with Strategic Policy S17.	Work on the bridge has commenced, so its inclusion is not necessary here. However, a new reference to bridges has been added to the policy. No change to the Plan.
PO24-9832	Strategic Policy S9	Encourage opportunities to enhance and establish green infrastructure along sustainable transport and the Public Rights of Way networks.	The level of detail suggested is considered to be covered by Strategic Policy S4. No change to the Plan.
PO24-9845	Strategic Policy S11	Recommend adding reference to the Essex Green Infrastructure Strategy, the Essex Green Infrastructure Standards Technical Guidance and Essex Green Infrastructure Standards Non-Technical Guidance.	Considered to be covered by the policy, and signposted elsewhere including the Essex Design Guide. No change to the Plan.
PO24-9846	Strategic Policy S12	Consider adding Hammonds Farm Neighbourhood Centre to the list of centres identified in para. 6.125.	Hammonds Farm has not yet been built, so the exact scale and location of a neighbourhood centre has not yet been determined. No change to the Plan.

PO24-9859	Strategic Growth Sites 2, 6, 71, 10 and 16a	Provide a safe traffic free environment around school pedestrian entrances having regard to the requirements set out in ECC's Developers' Guide to Infrastructure Contributions.	Reference to traffic free environments around school entrances are considered too detailed for the Policy but would be dealt with at Masterplanning or planning application stage. No change to the Plan.
PO24-9861	Strategic Growth Sites (all)	Add a requirement for financial contributions for provision of new and/or enhanced bus services.	Considered to be covered through measures to promote and enhance active and sustainable modes of transport. Site specific detail would be dealt with at Masterplanning or planning application stage. No change to the Plan.
PO24-9876	Strategic Growth Site 1e	Add additional text in relation to a proposed Chelmsford Transport Interchange Project with regards Chelmsford Bus Station.	Proposals are considered to be at too early a stage to be included in this iteration of the Plan. No change to the Plan.
PO24-9951	Policy GR1	Recommend an additional bullet requiring sites to enhance the existing pedestrian and cycle routes.	This would not apply across all sites covered by GR1, so is only included in relevant site policies. No change to the Plan.
PO24-9956	Strategic Growth Site 6	Strengthen the supporting text to reference the importance of the innovation park, the critical success factors needed, skills and the employment mix.	A number of initiatives are underway in relation to employment uses and labour and skills, the suggested amendments are considered too detailed for this Policy but are being dealt with through the Masterplan and planning agreement. No change to the Plan.
PO24-9962 PO24-10039	Strategic Growth Site 6; Strategic Growth Site 16a	Recommend the policy should require renewable and low carbon energy schemes, rather than just encourage them.	The policy has been amended to state 'where these are deliverable and do not give rise to environmental or other amenity impacts'. As such this remains something that will be encouraged and not required due to insufficient evidence to require this on site.

			No further change to the Plan.
PO24-10009	Strategic Growth Site 16a	The site should be designed from first principles to encourage sustainable travel, which will involve several considerations such as town centre, street design, vehicle route status, parking and servicing.	These matters are too detailed for the policy and are being dealt with through the Masterplan. No change to the Plan.
PO24-10024	Strategic Growth Site 16a	Recommended that a mix of uses to be provided that aligns with a clear sectoral strategy for the Garden Community, meeting occupier needs with a range of unit sizes for primary employment uses and supply chain.	These matters are too detailed for the policy and are being dealt with through the Masterplan. No change to the Plan.
	Policy DM1	ECC has commissioned a ' <i>Supported and Specialist Housing and Accommodation Needs Assessment</i> ' which will identify data on Chelmsford residents who need specialist accommodation to meet their needs due to their age, health, disability, mental health, cognitive ability or living with Learning Disability or Autism. The Housing Lin team will be discussing the outputs of the commission with CCC to ensure the work captures and reflects local data and policy requirements. It is anticipated that the outputs will be capable of being used to inform Local Plan preparation and future planning application responses.	The commission is due to be completed in late February/March 2025, and therefore not available to inform the policy and local plan viability. No change to the Plan
PO24-10106	Policy DM1	Would welcome clarity on the process for determining that a commuted sum is acceptable to the LPA, how the commuted sums will be used and what ECC's role will be (if any).	This matter will be dealt with through the Planning Obligations SPD to be consulted upon in February 2025. No change to the Plan.
PO24-10111; PO24-10112	Policy DM10; Policy DM11	Amended wording suggested to ensure consideration is given to early engagement with the Minerals and Waste Planning Authority.	Where relevant, a Mineral Infrastructure Impact Assessment is required as part of the planning application vetting process. No change to the Plan.
PO24-10119	DM19	Suggest adding a reference to the Essex Design Guide – Solar Farm Guiding Principles.	The policy references the adopted CCC Solar Farm Development SPD, which is considered to be most appropriate as it is directly related to the plan area. Non change to the Plan.
PO24-10131	DM31	Add a new 'model policy' relating to embodied carbon emissions from new development consistent with Policy NZ2 - Net Zero	The new Essex model Policy NZ1 has been included in the Regulation 19 Plan as Policy DM31 (incorporating agreed

		Carbon Development – Embodied Carbon (presently subject to review).	amendments following the Regulation 18 representations) along with the reasoned justification. Policy NZ2 relating to embodied carbon and its supporting evidence base is not sufficiently developed to include as an additional policy in the Pre-Submission Local Plan. ECC is working with CCC to consider the most appropriate means to implement model Policy NZ2 given the advanced stage of the Local Plan (Regulation 19) and the availability of a revised Policy NZ2 and its supporting evidence base. Consideration will be given to the 'Open Legal Advice' to be published on the Essex Design Guide titled ' <i>Ability of local planning authorities to mandate higher building fabric standards than current and proposed Building Regulations on new developments, prior to the adoption of formal local plan</i> '. No change to the Plan.
PO24-9840	Glossary	Add terms related to specific cohorts for supported and specialist housing and accommodation such as older people and people with a learning disability.	Considered to be too detailed and subject to change during the life of the Plan. No change to the Plan.

Areas without agreement

There are no areas without agreement or unresolved strategic matters.

3. Governance and on-going cooperation

CCC will continue to work collaboratively with ECC to address strategic matters that, in addition to those above, arise through the plan review process. This will occur on an ongoing basis through regular DtC meetings.

ECC will be consulted on the Pre-Submission Local Plan, where their comments will be considered alongside any existing/future strategic matters. A wider local authority Officer/Member DtC meeting will be arranged during the Pre-Submission Local Plan consultation and others will be organised where appropriate or requested.

This SoCG will be reviewed following the Pre-Submission Local Plan consultation and ahead of submission of the plan for Independent Examination (anticipated in June 2025). The aim will be to resolve any outstanding matters where cross-boundary strategic matters will be addressed by email and/or DtC meetings.

It is agreed that CCC is working collaboratively with ECC to ensure that cross-boundary strategic issues are properly considered and where appropriate reflected in the review of the Local Plan and effective and on-going joint working has, and will continue to be, undertaken.

4. Signatories

Chelmsford City Council Jeremy Potter Spatial Planning Services Manager Signature: <i>Jeremy Potter</i> Date: 20.12.24	Essex County Council Graham Thomas Head of Planning and Sustainable Development Signature: <i>Graham Thomas</i> Date: 04.02.25
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Appendix A – Map of Chelmsford City Council’s administrative area in context with its neighbouring districts and county councils.

Chelmsford City Council is adjoined by seven local planning authorities. Essex County Council is the local Highways and Transportation Authority and Education Authority. It is also responsible for the Minerals and Waste Local Plans with Southend-on-Sea Unitary Authority.



Appendix 1 - Chelmsford Local Plan Review (Regulation 18) – Preferred Option consultation (May 2024) – ECC Response

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
<p>Part 1 – Introduction - How we have engaged with other Councils and partners, paragraphs 1.27 and 1.28, page 18</p>	<p>ECC's officers have and will continue to work closely with CCC through the Duty to Cooperate (Duty) process (or any replacement process) to refine and progress preparation of the emerging Chelmsford Local Plan and the supporting evidence required, to continue to work collaboratively on strategic and cross boundary issues and to ensure ECC is able to assist in the viable delivery of key services and the provision of infrastructure arising from planned growth within Chelmsford. In preparing the Plan ECC has:</p> <ul style="list-style-type: none"> • responded to the Issues and Options consultation (2022). • Assisted in reducing the five Spatial Approaches (Issues and Options) to a single Preferred Approach • held regular Duty to Co-operate meetings with CCC regarding ECC roles and responsibilities and strategic cross border matters including the A414 through Danbury to A12, junction 18; and B1012/A132 around north of South Woodham Ferrers given the potential additional impacts arising from the emerging Maldon Local Plan Review. • ECC (and Essex Highways) have been commissioned to undertake the transportation modelling for the Local Plan Review and have completed assessment of the Spatial Approaches (Issues and Options); Preferred Options including junctions and the Sustainable Accessibility of locations. • Participated in Duty to Co-operate meetings with National Highways, particularly with regards the modelling outputs regarding the impact of the growth along the A12 junctions 17 – 19 and the connectivity of East Chelmsford Garden Community. • Education (primary, secondary and early years) – ECC has undertaken a full housing scenario assessment of the PO to assess the impact on existing and identify the need for new primary, secondary and early years and childcare nursery requirements. Any new facilities (including land requirement) have been included within the relevant Strategic Growth and Growth Site Policies. • Minerals and Waste – as Minerals and Waste Planning Authority (MWPA), ECC has informed the Site Selection Criteria of the Strategic Housing and Employment Land Availability Assessment (SHELAA); 	<p>None.</p> <p>ECC can confirm the active engagement between both parties as identified in the Duty to Co-operate Position Statement (May 2024) (page 4), along with the other activities listed in the comments regarding our statutory roles and responsibilities.</p>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
	<p>reviewed Mineral Resource Assessments including East Chelmsford Garden Community (agreed on-site use of minerals); informed the phasing and delivery of North Chelmsford Garden Community and the Chelmsford North East Bypass (CNEB) with regards rephasing permitted mineral extraction; identified site policy requirements for Mineral Resource Assessments and Minerals and Waste Infrastructure Assessments; and informed the preferred spatial strategy given the constraints to further expansion of Chelmsford Garden Community within the plan period given permitted mineral extraction and processing plant requirements</p> <ul style="list-style-type: none"> • Reviewed draft Strategic Principles, Strategic Growth and Growth Site policies and reasoned justification and Topic Papers (Climate Change, Infrastructure and Transport) • Policy DM31 (Net zero carbon development (In operation)) – lead the preparation of evidence (including legal justification); drafted the policy wording and its reasoned justification and input to plan viability study. • Responded to pre-apps, planning applications, masterplans and Infrastructure Delivery Plans of existing Strategic and Growth Sites Policies, which are yet to gain permission and commence delivery. • ECC has input to the Infrastructure Delivery Plan (IDP) Part 1 and is currently inputting to Part 2, which will support and evidence the Regulation 19 (Pre-Submission) Plan. It is imperative that all new development needs to be supported by the required local and strategic infrastructure, with an IDP to reflect up to date costings, aligned with development phasing, and such requirements are appropriately reflected in Local Plan and site allocations policies. • Progress the implementation of mandatory Biodiversity Net Gain and Local Nature Recovery Strategy through the Local Nature Partnership • Contributed to other plan evidence base documents. 	
Part 1 – Introduction, Essex Minerals Local Plan 2014, paragraph 1.34	For clarification, ECC, as the Minerals and Waste Planning Authority (MWPA), is not required to be consulted on all non-mineral related development proposed within Safeguarded Areas. Policy S8 of the Minerals Local Plan (MLP) makes reference to excluded development types, as listed in Appendix 5, Part B. Table 9 - Types of proposed development.	<p>ECC recommend paragraph 1.34 is amended to read:</p> <p><u>Essex County Council must be consulted on all non-mineral related development proposed within these Safeguarded Areas that meet the threshold and relevant tests set out in Policy S8 of the Essex Minerals Local Plan 2014.</u></p>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Part 1 – Introduction, Essex Minerals Local Plan 2014, paragraph 1.35, page 19	For clarification, ECC, as the MWPA, is not required to be consulted on all non-mineral related development proposed within Safeguarded Areas. MLP Policy S8 makes reference to excluded development types and which are listed in Appendix 5, Part B. Table 9 - Types of proposed development.	ECC recommend paragraph 1.35 is amended to read: <i>The MLP also designates Mineral Consultation Areas at a distance of 250m around active quarries, <u>other mineral infrastructure and areas allocated mineral deposits or permitted for mineral extraction.</u> Essex County Council must be consulted on all non-mineral related development proposed within these Consultation Areas <u>that meet the tests set out in Policy S8 or its successor policy, including the scoping of any Minerals Resource Assessment and Minerals Infrastructure Assessment.</u></i>
Part 1 – Introduction, Essex and Southend-on-Sea Waste Local Plan, paragraph 1.39, page 19	For clarification, ECC, as the MWPA, is not required to be consulted on all non-waste related development proposed within Waste Consultation Areas. Policy 2 of the Waste Local Plan (WLP) makes reference to excluded development types and which are listed in Appendix C - Development Excluded from Safeguarding Provisions, Table 21 Development in Waste Consultation Areas.	ECC recommend paragraph 1.39 is amended to read: <i>The WLP also designates Waste Consultation Areas <u>within 250m of safeguarded sites, or within 400m of a Water Recycling Centre at a distance of 250m around permitted and allocated waste management facilities.</u> Essex County Council must be consulted on all non-waste related development within these areas, <u>that meet the tests set out in Policy 2 (except for exceptions defined in Appendix C), to ensure that the proposed development would not adversely impact on their existing or future operation, along with the scoping of any Waste Infrastructure Impact Assessment.</u></i>
Part 1 – Introduction, Planning Validation Requirements, paragraph 1.42, page 20	ECC notes that paragraph 1.42 no longer makes reference to Education Land Compliance Assessments (as referenced in paragraph 1.29 of the adopted Local Plan) as a necessary supporting document which CCC requires to validate an application. In responding to the Local Validation List consultation in March 2024, ECC stated that: <i>ECC has a number of documents that are required to be submitted with planning applications, such as Land Compliance Study for education facilities, a Transport Assessment/Statement, Travel Plan and matters relating to Sustainable Drainage Systems (see below). ECC recommends</i>	ECC recommend the following is incorporated into paragraph 1.43 or cross referenced to the revised LVL, subject to its inclusion therein. <i><u>Chelmsford City Council operates within a two-tier local government system. Essex County Council has a statutory role as the highway and transportation authority; the lead authority for Education including early years and childcare (EYCC), Special Education Needs and Disabilities (SEND), and Post 16 education; the</u></i>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
	<p><i>additional wording is added to the Local Validation List (LVL) document that makes it clear to the reader/user that they should also consult ECC and in particular, the ECC Developers' Guide to Infrastructure Contributions (Developers' Guide) for guidance on documents to be submitted with planning applications. This reference will also provide the flexibility to use updated versions of the Developers' Guide in the future, without the LVL being out of date.</i></p> <p>ECC recommends the suggested wording is incorporated into the LVL and either repeated or cross referenced in paragraph 1.43 of the Review Plan.</p>	<p><u>Minerals and Waste Planning Authority; the Waste Disposal Authority; Lead Local Flood Authority, lead advisors on public health; responsibilities for adult social care (housing needs of older people and adults with disabilities); and the provision of libraries. The ECC Developers' Guide to Infrastructure Contributions should be used for guidance on the required documents and plans to be submitted with planning applications, such as Land Compliance Study for education facilities, Transport Assessments/Transport Statements, Travel Plans and matters related to Sustainable Drainage Systems.</u></p>
Part 1 – Introduction, What is Community-Led Planning and where does it fit in, paragraph 1.43, page 20	NPPF, paragraph 73 a) and b) now requires Local Planning Authorities (LPAs) to support the development of exception sites for community-led development on sites that would not otherwise be suitable as rural exception sites.	ECC recommend 'constituted community organisation' in paragraph 1.43 is defined in D - Glossary, consistent with NPPF, page 69 - Community-led developments.
Part 2 – About Chelmsford, paragraph 2.14 bullet 1 – Providing New and Improved Transport	The key strategic objective makes reference to sustainable transport opportunities in the first sentence, however it would be good to reiterate this in the next sentence to illustrate how important they are in mitigating the impact of development.	<p>ECC recommend that the second sentence is amended to read:</p> <p><i>Where additional capacity is required in the form of new or upgraded transport infrastructure (whether this be active travel, sustainable or highways infrastructure) to support new development, ensuring that this is delivered in a phased and timely way to minimise the impact of new development. to ensure this is provided alongside the development</i></p>
Part 2 – About Chelmsford, North and Central Essex, paragraph 2.14, bullet 2 – Providing	The key strategic objectives make reference to meeting the needs of 'a growing and ageing population in North Essex' but no reference to central Essex which would cover Chelmsford. Is it to be assumed that as this paragraph mentions the Mid and South Essex Integrated Care Board that the strategic objectives are to cover the Chelmsford housing growth needs as well?	<p>Reference to growing and ageing population in North Essex needs to make more explicit that this covers Chelmsford as part of Central Essex.</p> <p>Older people's needs should also be met in Chelmsford and not just North Essex.</p>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
sufficient homes, page 25	ECC would also like to see reference to the growing population of people with disabilities as well, as their housing needs also need to be met.	
Part 2 – About Chelmsford, Transport Figure 6 and paragraph 2.23	<p>ECC works collaboratively with Chelmsford City Council and welcomes the overview of the transport system and the key role it plays being highlighted in Part 2 – About Chelmsford, Transport.</p> <p>Reference to the Great Eastern Mainline connecting to Colchester, Ipswich and Norwich would be worthwhile given there is in and out commuting to these locations as well as London.</p>	<p>ECC recommend that Figure 6 and paragraph 2.23 includes reference connecting to Colchester, Ipswich and Norwich on the Great Eastern Mainline</p> <p><i>The Great Eastern Main Line provides rail services between London Liverpool Street and the East of England, as far as Norwich, including Chelmsford.</i></p>
Part 3 – Strategic Priorities – Strategic Priority 2: Promoting smart, active travel and sustainable transport, paragraph 3.6	ECC fully supports this strategic priority. Reference could be made to the recent initiatives.	<p>ECC recommend paragraph 3.6 be amended to read:</p> <p><i>A number of recent initiatives will contribute towards achieving this aim, and these have informed policy (e.g. <u>Essex County Council's Safer Greener Healthier campaign</u>).</i></p>
Part 3 – Strategic Priorities, Strategic Priority 4, paragraph 3.22, page 39	<p>For clarity, paragraph 3.22 should be amended to be consistent with NPPF, paragraph 216 c) which seeks to ensure that '<i>any mineral reserves are not sterilised by future development.</i>'</p> <p>ECC, as the MWPA, acknowledges that given the spatial extent of mineral reserves in the plan area, that some degree of sterilisation is unavoidable. The NPPF sets out that LPAs should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working. However, if the need for such allocation outweighs these concerns, the test for prior extraction is whether it is practical and environmentally feasible to do so.</p>	<p>ECC recommend paragraph 3.22 is amended to read:</p> <p><i>These plans, alongside partnership working with the County Council, have informed the Local Plan process and will ensure that there is appropriate management of waste and that any mineral reserves are not sterilised by future development <u>where the development is not necessary, and their prior extraction is practical and environmentally feasible.</u></i></p>
Part 3 – Strategic Priorities, Strategic Priority 5, paragraph 3.24, page 39/40	The Strategic Housing Needs Assessment (SHNA) demonstrated a significant need for affordable housing of 623 affordable homes per annum stating that given the cost of housing locally affordable home ownership products are unlikely to be considered ' <i>genuinely affordable</i> ', and the need to provide for rented affordable housing where possible.	<p>ECC recommend the first sentence of paragraph 3.24 is amended to be consistent with the SHNA evidence to read:</p> <p><i>There is significant demand for affordable housing (particularly rented affordable) or first homes for first time buyers or those on lower incomes.</i></p>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
	<p>There appears to be an inconsistency in that paragraph 3.24 makes reference to seeking affordable housing or first homes but no reference to rented affordable housing consistent with the SHNA and the detail referenced in paragraph 8.20.</p> <p>This would be consistent with the outcomes identified in the Chelmsford City Council Housing Strategy 2022-2027, namely:</p> <ul style="list-style-type: none"> • <i>A reduction in the number of families in temporary accommodation and the length of time they spend waiting.</i> • <i>A reduction in the cost to the Council in having to provide temporary accommodation.</i> • <i>An improvement in the supply from the existing stock as families are helped to move.</i> <p>ECC supports reference to the identification of need for specialist accommodation for older people and people with disabilities.</p>	
Part 3 – Strategic Priorities – Strategic Priority 8: Delivering new and improved strategic and local infrastructure	ECC suggests some slight amendments to the modelling overview to provide reassurance that the Preferred Option represents the best option in transport terms.	<p>ECC recommends that section 3.39 be amended to read:</p> <p><i>The modelling outputs indicate that the patterns and severity of congestion across Chelmsford would remain broadly consistent regardless of differences in Local Plan development allocations and the mitigation measures identified, however this Preferred Option results in the lesser impact than the other options considered..</i></p>
Part 4- Our Vision and Spatial Principles, paragraph 4.2, bullet 9, page 45.	<p>The Essex Green Infrastructure Strategy (2020) and the Essex Green Infrastructure Standards (June 2022) champion the enhancement, protection, and creation of an inclusive and integrated network of green spaces. from a multifunctional perspective, combining uses such as sustainable drainage, public open space, walking and cycling routes and biodiversity conservation to combine functional uses with amenity benefits.</p> <p>ECC welcome reference to multifunctional green and blue infrastructure throughout the Plan and integrated as part of the Strategic Priorities and recommend its reference in bullet 9 for consistency.</p>	<p>ECC recommend bullet 9 is amended to read:</p> <ul style="list-style-type: none"> • <i>provide new and expanded infrastructure, services and facilities to support new development, including the provision of new education, healthcare facilities and <u>multifunctional</u> green/blue infrastructure.</i> <p>ECC recommend a new bullet point to make reference to BNG and LNR, for example:</p>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
	With the requirements for Biodiversity Net Gain (BNG) and the emerging Greater Essex Local Nature Recovery Strategy (GELNRS) these should be referenced as requirements for the future of the plan area to 2041.	<ul style="list-style-type: none"> <u>Deliver Biodiversity Net Gain and wider environmental net gains, that forms an important component of nature recovery.</u>
Part 4- Our Vision and Spatial Principles, 4.3 - Strategic Policy S1 – Spatial Principles, page 46	ECC welcome reference to securing the enhancement and extension of the City's Green Infrastructure Resource in paragraph 4.3. This should be strengthened by incorporating green infrastructure within the Strategic Policy S1.	<p>ECC recommend an additional Spatial Principle, which could read as follows:</p> <ul style="list-style-type: none"> <u>Strategic green infrastructure to integrate with ecological networks (including any future Nature Recovery Network), as well as the wider landscape, which together delivers multiple environmental, social and economic benefits.</u>
Part 5, Strategic Policy S2 – Addressing Climate Change and Flood Risk, page 51	<p>The inclusion of multifunctional green infrastructure as a measure to help the City to mitigate and adapt to climate change (bullet 9) is welcomed.</p> <p>ECC recommends reference is made to the contribution of BNG to protecting and restoring our ecosystems and providing resilience to the impacts of climate change.</p>	<p>ECC recommend an additional bullet to read:</p> <ul style="list-style-type: none"> <u>Assist the delivery of net gain for biodiversity that will deliver mitigation and adaptation benefits.</u>
Part 5, Strategic Policy S14 – Health and Wellbeing, paragraph 2, bullet 1, page 54	<p>ECC welcomes and fully supports the Strategic Policy for health and wellbeing outlining the council's commitment to improving health and wellbeing and reducing health inequalities for Chelmsford residents. The Chelmsford Health and Wellbeing Plan works in conjunction with the statutory Essex Joint Health and Wellbeing Strategy to provide a coherent and joined up approach to tackling inequalities and improving health.</p> <p>ECC Spatial Planning and Public Health are currently developing a programme to further support the link between Planning and Public Health at both County and District levels. This programme aims to support local public health practitioners in working with planning policy and development management (DM) on the use of Health Impact Assessments (HIAs). Monitoring the effectiveness of HIAs through established protocols between planning and public health will enhance the local processes of implementing HIAs and ensure positive outcomes.</p> <p>ECC recommend bullet 1 is also amended to be consistent with the vision set out in the Chelmsford Health and Wellbeing Plan to help reduce `health</p>	<p>ECC recommend bullet 1 is amended to read:</p> <ul style="list-style-type: none"> <u>Contributes towards the strategic priorities of both the Essex Joint Health and Wellbeing Strategy and Chelmsford Health and Wellbeing Plan to help reduce health inequalities including health and improve the opportunities for adults and children to livewell</u>

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	<i>inequalities and improve the opportunities for adults and children to livewell so that they can enjoy a healthy, safe, and fulfilling life.'</i>	
Part 5, Strategic Policy S14 – Health and Wellbeing, paragraph 2, bullet point 4, page 54	The interconnectivity of natural environment, flood protection and water management, outdoor sport and open space, and public realm is an important part of the green and blue infrastructure (GBI) network and shouldn't be seen or treated in silo. The right design and location, wide range of functions and benefits of GBI can fulfil people and wildlife, the interactions should be emphasised.	ECC recommend an amendment to paragraph 2, bullet 4 to read: <ul style="list-style-type: none"> • <i>Creates opportunities for healthy and active lifestyles including access to and the provision of new multifunctional green and blue infrastructure, spaces for play, recreation and sports, and better active travel including provision for safe and attractive <u>well-connected</u> pedestrian and cycle routes.</i>
Part 5, Strategic Policy S14 – Health and Wellbeing, paragraph 2, bullet point 5, page 54	ECC consider bullet 5 should be amended to reflect the need for housing to be more readily adaptable to the changing requirements of occupiers, particularly those with physical and mental disabilities. Further clarification is sought as to whether reference to ' <i>externally and internally</i> ' refers to the physical building or also its wider environs.	ECC recommend paragraph 2, bullet 5 is amended to read: <ul style="list-style-type: none"> • <i>Provides good quality housing both externally and internally, to provide a healthy living environment <u>now and in the future.</u></i>
Part 5, Strategic Policy S14 – Health and Wellbeing, paragraph 2, bullet point 8, page 54	ECC recommend bullet 8 is amended to require new development to consider providing good access to services and facilities for residents living with or affected by dementia, poor mobility, physical or sensory impairments.	ECC recommend paragraph 2, bullet 8 is amended to read: <ul style="list-style-type: none"> • <i>Provides opportunities for access to <u>services, facilities and nature</u> to support mental health wellbeing residents living with or affected by dementia, poor mobility, physical or sensory impairments.</i>
Part 5, Strategic Policy S14 – Health and Wellbeing, paragraph 3, bullet point 3 and paragraph 5.23, page 54 and 57	ECC welcome reference to walkable neighbourhoods in paragraph 3, bullet 3 and reference to the Essex Design Guide and supplementary guidance (A New Development Model for Essex, October 2023) in paragraph 5.23. ECC recommend development is required to ' <i>have regard</i> ' to this guidance as a policy requirement, consistent with paragraph 5.23.	ECC recommend paragraph 3, bullet 3 is amended to read: <ul style="list-style-type: none"> • <i>Creation of walkable neighbourhoods to support people to live healthy lifestyles <u>having regard to the Essex Design Guide – A New Development Model for Essex.</u></i>

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Part 5, Strategic Policy S14 – Health and Wellbeing, paragraph 3, bullet point 5, page 54	ECC welcomes and fully supports that place making objectives should ensure physical environments enable communities to have resilience to cope with life's changes. ECC recommend this is expanded to consider the 'life course' reflecting on the critical stages and transitions where large difference can be made in preventing and promoting health and wellbeing.	<p>ECC recommend paragraph 3, bullet 5 is amended to read:</p> <ul style="list-style-type: none"> • <i>Creation of a physical environment where people have the resilience to with life's changes across the <u>life course</u>, such as a dementia-friendly environment</i>
Part 5, Strategic Policy S14 – Health and Wellbeing, paragraph 4, page 55	ECC seek clarification in the policy to specify why impact on different groups is important and giving distinction to the different population groups.	<p>ECC recommend paragraph 4 is amended to read:</p> <ul style="list-style-type: none"> • <i>For large scale development (defined as residential development of 50 or more <u>all Use Class C2 (Residential Institution)</u> and non-residential development in excess of 1,000 sqm) a Health Impact Assessment will be required to assess the likely positive and negative impact on the health <u>and wellbeing</u> of different groups in the population, <u>particularly those who may be more susceptible to poorer health outcomes, as well as</u> on existing health services and facilities.</i>
Part 5, Strategic Policy S14 – Health and Wellbeing, paragraph 4, page 55	<p>ECC recommend an HIA is also required for all development in Use Class C2 (Residential Institutions) consistent with the requirements set out in the EPOA Essex Healthy Places Advice notes for planners developers and designers, page 11 and the ECC response to the Local Validation List Update in March 2024.</p> <p>ECC responded to the Local Validation List Update consultation (March 2024) seeking:</p> <ul style="list-style-type: none"> • reference be made to all development in Use Class C2 (Residential Institutions) to ensure consistency with the EPOA Healthy Places Guidance, as it was omitted; • the adopted Local Plan removed Policy DC8 Health Impact Assessments (Core Strategy and Development Control Policies) and replaced it with a validation requirement. ECC would seek a policy to be incorporated into the Local Plan Review. Consequently, Policy S14 is welcomed. 	<p>ECC recommend paragraph 4 is amended to read:</p> <p><i>For large scale development (defined as residential development of 50 or more units, <u>all Use Class C2 (Residential Institution)</u> and non-residential development in excess of 1,000 sqm) a Health Impact Assessment will be required to assess the likely positive and negative impacts on the health <u>and wellbeing</u> of different groups in the population, <u>particularly those who may be more susceptible to poorer health outcomes, as well as</u> on existing health services and facilities.</i></p>

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	<ul style="list-style-type: none"> reference be made to 'health <u>and wellbeing</u>' to cover the wider determinants of health rather than simply health services and facilities. <p>It is important to prepare an HIA for C2 uses given the scale of health and wellbeing issues faced by this community, which will increase given the ageing population.</p> <p>An HIA will also help to assess if the green infrastructure provision meets the diversity of user groups, whose needs may vary according to age, abilities, interest, or cultural beliefs.</p>	
Part 5, Strategic Policy S14 – Health and Wellbeing, paragraph 5.22, page 56	ECC recommend reference is made to the aspirations contained in the Chelmsford Food Plan (2023), which underpins the Chelmsford Health and Wellbeing Plan, with its core aims of raising awareness across the city area of healthy eating, improving access to good-quality food, and promoting sustainable diets.	ECC recommend CCC consider the relationship to the adopted Chelmsford Food Plan .
Part 5, Strategic Policy S14 – Health and Wellbeing, paragraph 5.25, page 57	As stipulated in paragraph 4 of the policy large scale development is required to assess impacts on health and wellbeing through HIA. The Livewell Development Accreditation provides the opportunity for smaller scale developments to assess their impacts. This should be highlighted in paragraph 5.25 considering the number of small settlements in the city area. Encouraging desktop HIA assessments for small scale applications is encouraged as this may assist in addressing cumulative impact of smaller site allocations.	<p>ECC recommend paragraph 5.25 is amended to read:</p> <p><i>The schemes encourages developers (including small scale developments) to promote the physical and mental health of residents when designing and building new developments. The voluntary scheme recognises the wider factors that impact on health and wellbeing including access to healthier food, support for local employment and education facilities and inclusive communities. Further details on the accreditation can be found on the Essex Design Guide.</i></p>
Part 5, Strategic Policy S14 – Health and Wellbeing, paragraph 5.26, page 57	ECC seek further clarification with regards the process and details to be undertaken with regards 'an initial assessment' for developments that are required to complete a HIA. Public Health England (PHE) guidance for HIA and the Essex Healthy Places Guidance highlight the types of HIA, such as desktop, rapid and full/comprehensive. In the HIA process, screening is not always required, especially where local policy identifies that HIAs are deemed to be part of the planning process for specified development scales. The scoping stage allows decisions to be made about what the aims of the HIA are and the type of HIA (Desktop/Rapid/Full) to be undertaken. For example, in the PHE	<p>The scope of the assessment and the detail provided should reflect the scale of impact, which is likely to be greater for larger scale developments.</p> <p>Limiting the initial assessment of the HIA to 'impact upon health services' will limit the impact and effectiveness of the HIA process in considering development impacts across a wide range of factors known to impact on health and wellbeing.</p>

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	<p>guidance, a desktop assessment would be recommended for planning applications outside local triggers but with a health impact (e.g., 49 units or less)</p> <p>The principle of an HIA, as highlighted within the Strategic Policy, is to maximise and minimise negative impacts on health and wellbeing, considering a wide range of determinants, including access to healthcare infrastructure. Limiting the initial assessment of the HIA to <i>'impact upon health services'</i> will limit the impact and effectiveness of the HIA process in considering development impacts across a wide range of factors known to impact on health and wellbeing.</p>	<p>All assessments should at least consider the areas included in the Essex Healthy Places Guidance and updated Checklist (2023).</p> <p>CCC should consider how to ensure ECC, and district public health officers are engaged in the early stages to ensure the scope of assessment is considered prior to commencement of an HIA. Early engagement will help ensure that the HIA can inform proposals effectively. This would also support the aims of the Livewell Development Accreditation scheme in promoting early engagement.</p>
Part 5, Strategic Policy S15 – Creating Successful Places, paragraph 5.29, page 58	ECC recommend reference is made to the Essex Design Guide which provides a key planning and design resource to help inform the plan making and planning application decision making process across Essex. It was refreshed in 2018, retaining the original core design principles, but now incorporates reference to revised planning guidance and frameworks, and introduces new themes around ageing population, digital and smart technology, active design, health and wellbeing, garden communities, green infrastructure and climate change.	<p>ECC recommend paragraph 5.29 makes reference to the Essex Design Guide to read:</p> <p><u><i>Development proposals should have regard to the Essex Design Guide which provides key design principles and advice across a wide range of topics to inform the plan making and planning application decision making process.</i></u></p>
Part 5, Strategic Policy S15 – Creating Successful Places, paragraph 5.31, page 58	<p>ECC recommend reference is made to the importance of providing the right amount and type of employment and business opportunities, particularly in larger developments and garden communities.</p> <p>Paragraph 5.31 makes reference to development being about creating a successful new place, but also securing its long- term future. Placemaking and design is essential to a successful employment development as employees need an attractive and healthy environment to work in and places created are also attractive to businesses and inward investment.</p>	
Part 5, Strategic Policy S4 – Conserving and Enhancing The Natural Environment, paragraph 5.49, page 63	ECC acknowledges reference is made to the City Council's Green Infrastructure Strategic Plan. ECC recommend paragraph 5.49 should also refer to the Essex Green Infrastructure Strategy (2020) (where its preparation included CCC) and the Essex Green Infrastructure Standards Technical Guidance and Essex Green Infrastructure Standards Non-Technical Guidance , which can be found on the Essex Design Guide (EDG) website here .	<p>ECC recommend an additional sentence is added to paragraph 5.49 is amended to read:</p> <p><u><i>New development will be required to have regard to the Essex Green Infrastructure Strategy (2020) and the Essex Green Infrastructure Standards Technical Guidance and Essex Green Infrastructure Standards Non-Technical Guidance.</i></u></p>

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Part 5, Strategic Policy S4 – Conserving and Enhancing the Natural Environment, page 62	<p>ECC recommend the policy makes reference to the contribution Local Recovery Networks to support nature recovery consistent with the justification in paragraph 5.45.</p> <p>ECC is the ‘Responsible Authority’ for delivering the Greater Essex Local Nature Recovery Strategy (GELNRS) working closely with the Essex Local Nature Partnership (LNP). The GELNRS is being prepared for completion by Mid-2024. The GELNRS will form the baseline for habitat information, which in turn will generate action to promote biodiversity management and improvement (including identifying strategic opportunity areas) and will provide further useful information.</p>	<p>ECC recommend an additional sentence be added to paragraph to read:</p> <p><u>Maximises opportunities for the preservation, restoration, enhancement, and connection of natural habitats in accordance with the Local Nature Recovery Strategy or future replacements.</u></p>
Strategic Policy S6 – Housing and Employment, paragraph 6.16, page 71	<p>ECC welcomes the approach of CCC to proactively decide to accommodate the higher employment requirements in the Employment Land Review (2023) given the significant expansion to be delivered within Chelmsford over the period to 2041 and to maintain a better balance of new homes and employment opportunities.</p>	<p>Reference should also be made in paragraph 6.16 to seeking:</p> <p><u>Employment growth and skills capacity should aim to match levels of housing growth to help reduce out commuting</u></p>
Part 6, Strategic Policy S7 – The Spatial Strategy, page 72	<p>ECC, has assisted CCC in refining the five Spatial Approaches to the current Preferred Spatial Strategy via a number of areas including the response to the Issues and Options; local and strategic highway and transportation, education, minerals and waste, infrastructure, climate change and the sustainable accessibility of locations.</p> <p>ECC supports the continuation of the Spatial Strategy for Growth consistent with the adopted Local Plan, by focussing on the most connected locations or those with direct access to key services and facilities (greater opportunities for sustainable travel and reduces need to travel), along with taking advantage of existing and planned infrastructure improvements. ECC has had considerable influence in shaping the carried over site allocations from the adopted plan in terms of policy and infrastructure requirements with regards masterplan preparation/approval, planning application responses and their subsequent delivery. ECC has influenced the choice of locations for growth by considering any impact and/or capacity on highways and education and on permitted mineral extraction and processing plant requirements.</p>	<p>No change – comments provided for context.</p>

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	<p>ECC supports the continued approach to protect the Green Belt and Green Wedges (providing for wildlife and nature conservation, flood storage and active travel routes).</p> <p>Some villages have been allocated some growth, namely East Hanningfield, Ford End, Bicknacre and others no growth following advice from ECC regarding constraints/capacities including highways and education.</p> <p>Consequently, ECC supports the conclusion in the Integrated Impact Assessment (IIA) paragraph 6.1.9, which states:</p> <p><i>Five alternative Spatial Approaches to the preferred Spatial Strategy were assessed in the Issues and Options IIA Report. Overall, these alternative approaches are considered to perform less well than the preferred Spatial Strategy when considered against national planning policy, an analysis of the Issues and Options consultation responses, the Issues and Options IIA Report, the Local Plan Vision and Spatial Principles, Settlement Hierarchy, environmental constraints, the availability and viability of land for development and discussions with key stakeholders.</i></p>	
Part 6, Strategic Policy S7 – The Spatial Strategy, paragraph 6.24, bullet 1, page 78	The Local Plan Review carries over the sustainable urban extensions allocated in the adopted Local Plan at Great Leighs and South Woodham Ferrers.	<p>ECC recommend paragraph 6.24, bullet 1 is amended to read:</p> <ul style="list-style-type: none"> • <i>Sustainable urban extensions of Chelmsford, <u>Great Leighs and South Woodham Ferrers</u> for new housing and employment.</i>
Part 6, Strategic Policy S7 – The Spatial Strategy, paragraph 6.43, page 81	<p>Growth Area 2 – North Chelmsford, paragraph 6.43 states that developments at Great Leighs will help deliver strategic infrastructure including the Chelmsford North East Bypass.</p> <p>Site Policies SGS 6 - North East Chelmsford (Chelmsford Garden Community); SGS 7a – c (Great Leighs) and North of Broomfield (SGS 8) also make reference to being required to make ‘<i>Financial contributions to delivery of the Chelmsford North East Bypass</i>’</p> <p>For clarity reference should also be made to SGS6 and North Broomfield (SGS8)</p>	<p>ECC recommend paragraph 6.43 is amended to read:</p> <p><i>Alongside <u>SGS 6</u> other developments at Great Leighs (Location 7) and North of Broomfield (Site SGS 8), this allocation will help to deliver strategic infrastructure including the Chelmsford North East Bypass.</i></p>

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Part 6, Strategic Policy S7 – The Spatial Strategy, paragraph 6.49, page 82	<p>Growth Area 3 – South and East Chelmsford, paragraph 6.49 states that the East Chelmsford Garden Community (Hammonds Farm), Land adjacent to A12 Junction 18 and Waltham Road Employment Area employment allocations will help to deliver strategic infrastructure including the Chelmsford North East Bypass.</p> <p>Waltham Road Employment Area (SGS 9a) is located in the Growth Area 2 – North Chelmsford and the policy does not require a financial contribution to the CNEB and should be deleted.</p> <p>Site Policies SGS 16a – East Chelmsford Garden Community and SGS 16b Land adjacent to A12 Junction 18 make reference to being required to make ‘Financial contributions to delivery of the Chelmsford North East Bypass’</p>	<p>ECC recommend paragraph 6.49 is amended to read:</p> <p><i>The East Chelmsford Garden Community (Hammonds Farm - <u>SGS 16a</u>) and Land adjacent to A12 Junction 18 (<u>SGs 16b</u>) and Waltham Road Employment Area employment allocations will help to deliver strategic infrastructure including the Chelmsford North East Bypass.</i></p>
Part 6, Strategic Policy S8 – Delivering Economic Growth, bullet 1, page 86	The policy focuses new employment at locations well-served by existing or planned public transport provision. Many journeys to work are also undertaken by walking and cycling either directly or as part of a staggered mode journey, particularly in sustainable locations within urban areas.	<p>ECC recommend bullet 1 is amended to read:</p> <ul style="list-style-type: none"> • <i>Priority will be given to the use of previously developed land in sustainable locations and also focusing new employment at locations well-served by <u>active and sustainable modes and existing or planned public transport provision</u></i>
Part 6, Strategic Policy S8 – Delivering Economic Growth, page 86	The policy could specifically make reference to the importance of regional clusters and sector development.	<p>ECC recommend an additional bullet to read:</p> <ul style="list-style-type: none"> • <i><u>Support regional growth sector priorities and clustering of economic activity.</u></i>
Part 6, Strategic Policy S8 – Delivering Economic Growth, paragraph 6.58, page 86	The reasoned justification should include reference on the need for an appropriate mix of uses to reflect market need.	<p>ECC recommend the following text be added to paragraph 6.58:</p> <p><i><u>There is a need for an appropriate mix of serviced development land parcels, shell and core buildings and the quality and size of floorspace fit out reflecting the requirements of the market sector and the location of the employment space.</u></i></p>

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		<p>Reference should also be made to:</p> <p><i><u>B8 and other lower density uses will be directed to appropriate locations to avoid 'crowding out' optimum sites for smaller scale and higher density employment uses.</u></i></p>
Part 6, Strategic Policy S8 – Delivering Economic Growth, paragraph 6.62, page 87	Reference could be made to the importance of the strategic employment site allocations in helping to achieve regional sector growth.	Paragraph 6.62 should make reference to the importance of the strategic sites and Garden Communities creating the agglomeration for economic development especially to support the sector growth areas including clean energy; advanced manufacturing and engineering; digi-tech; life sciences (including med-tech and care-tech) within the new Garden Communities or existing employment / education areas already working in research and development. This will allow for more significant amounts of inward investment and the progression towards a more sustainable and inclusive economy including the reduction of out-commuting.
Part 6, Policy S8 – Delivering Economic Growth, Paragraph 6.59, page 86	<p>Reference to the South East Local Enterprise Partnership (SELEP) needs to be deleted. From 1st April 2024 the activities that have been undertaken by the SELEP to support local growth will be undertaken by local authorities, including Essex County Council. The transition of responsibilities is ongoing.</p> <p>ECC recommend reference be made to the Local Skills Improvement Plan (LSIP) for Essex, Southend and Thurrock which provides detail on local economy requirements for skills and how to deliver the priorities. The LSIP is supplemented by annexes which go into further detail on local strategic context, methodologies and processes, and data and intelligence. This has been accompanied by the Local Skills Improvement Fund (LSIF) providing colleges and providers with capital and revenue funding to support programmes, facilities and equipment to deliver against the LSIP.</p>	<p>Amend paragraph 6.59 to read:</p> <p><i>To maximise opportunities for economic growth and development, the Council is working closely with the South East Local Enterprise Partnership (SELEP), the Greater Essex Business Board (GEBB) and the North Essex Economic Board (NEEB). More locally, the Council has also set up an Investors' and Developers' network. The Council's Economic Strategy and Employment Land Review, alongside Essex County Council's Essex Sector Development Strategy and <u>the Essex, Southend-on-Sea and Thurrock Local Skills Improvement Plan</u> provides the local evidence to support the relevant Local Plan policies.</i></p>
Part 6, Strategic Policy S8 – Delivering	ECC welcome reference in principle 6 and paragraph 6.63 to the need to prepare Employment and Skills Plans (ESP) and the identified strategic site thresholds. Further guidance is provided in Section 5.4 and Appendix K of	ECC recommend the following be added to paragraph 6.63 to read:

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Economic Growth, principle 6 and paragraph 6.63, page 86	<p>the ECC Developers Guide to infrastructure contributions (2023) and could be referenced in the reasoned justification. Any updated Planning Contributions SPD will need to be consistent with the guidance set out in the ECC Developers' Guide to Infrastructure Contributions.</p> <p>The Developers' Guide requires the ESP to be shared with and agreed by the LPA and ECC ahead of the s.106 being signed off and this should be referenced in paragraph 6.63.</p>	<p><u>The ESP must be shared with and agreed by the LPA and ECC ahead of the s.106 being signed off. The ESP should include options such as the direct delivery or skills and employability programmes, school / college engagement and work experience opportunities, construction or workplace apprenticeship schemes for local residents. This will support the agenda to reduce disparities in Chelmsford.</u></p>
Part 6, Strategic Policy S16 – Connectivity and Travel, paragraph 6.74	<p>ECC welcomes new Strategic Policy S16.</p> <p>Reference to how development can support the delivery of the Chelmsford LCWIP routes should be made.</p>	<p>ECC recommends an additional sentence to paragraph 6.74 to read:</p> <p><u>New development should look to either provide contributions to deliver sections of these routes if they are in the vicinity, or provide active travel connections to them.</u></p>
Part 6, Strategic Policy S16 – Connectivity and Travel, bullet 5 and paragraph 6.65, page 88	<p>ECC support reference in bullet 5 to supporting the use of public transport and active and sustainable modes of travel for all.</p> <p>ECC recommend paragraph 6.65 is amended to refer to a wider definition of vulnerable users of these modes.</p>	<p>ECC recommend paragraph 6.65, second sentence is amended to read:</p> <p><u>This should include removing barriers to travel for those most vulnerable users, including individuals living with disabilities, limited mobility or long-term limiting health conditions and those within society who are disadvantaged providing opportunities for people with disabilities to access such facilities and services.</u></p>
Part 6, Strategic Policy S16 – Connectivity and Travel, paragraph 6.77, page 90	<p>The Essex Parking Standards are a material consideration when considering development proposals, but they do not form part of the Chelmsford Local Plan and therefore the requirement to be 'in accordance with' the standards is not considered justified.</p> <p>These parking standards are currently being reviewed by the Essex Planning Officers' Association (EPOA) and can be viewed here.</p>	<p>ECC recommend paragraph 6.77 is amended to read:</p> <p><u>The need for electric charging facilities for vehicles will be secured through relevant site allocations and design policies having regard to in accordance with the Essex Parking Standards – design and good practice 2009, or as subsequently amended.</u></p>
Part 6, Policy S9 – Infrastructure Requirements,	<p>The Army and Navy Sustainable Transport Package is wider than just the junction itself. Although reference to the Sandon and Chelmer Valley P&R expansions are referenced separately, it is worth elaborating on the junction itself.</p>	<p>ECC recommend bullet 6 is amended to read:</p>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Transport and Highways, bullet 6		<ul style="list-style-type: none"> <i>Improvements to the Army and Navy Junction <u>and routes connecting to the junction as part of a sustainable transport package.</u></i>
Part 6, Policy S9 – Infrastructure Requirements, Transport and Highways, bullet 7	The southern part of the A131 is now the A1016 so reference to this section needs to be included.	<p>ECC recommend bullet 7 is amended to read:</p> <ul style="list-style-type: none"> <i>Improvements to the A131 <u>and A1016 (Essex Regiment Way).</u></i>
Part 6, Policy S9 – Infrastructure Requirements, Transport and Highways, bullet 11	Active and sustainable travel links to education and health should also be included.	<p>ECC recommend bullet 11 is amended to read:</p> <ul style="list-style-type: none"> <i>New and improved active and sustainable travel routes both within development sites and to provide connections to centres and hubs of activity such as transport nodes, City, Town and Neighbourhood Centres, strategic areas of recreation and employment areas, <u>education and health centres.</u></i>
Part 6, Policy S9 – Infrastructure Requirements, Transport and Highways, bullet 12, page 91	<p>ECC is mindful that Sandon Park and Ride (SPAR) must fulfil its function to capture Chelmsford bound motorists travelling into the city from wider distances and therefore any proposal must not reduce the quantum of spaces at the SPAR. Any bus service routing directly through the SPAR would impact its service/operation significantly and would not be supported.</p> <p>A range of potential options are being investigated to provide connectivity via a new bridge (walking, cycling and bus) between the Hammonds Farm site (Site 16A) and the A414 <u>close</u> to SPAR. Any option will consider the potential to link in with emerging proposals regarding the strategic sites in East Chelmsford (Sites 3A and 3B) and improvements identified in the Army and Navy Sustainable Transport Package in order to provide onward connectivity benefits.</p>	<p>ECC recommend bullet 12 is amended to read:</p> <ul style="list-style-type: none"> <i>Provide a new active and sustainable route and bridge over the A12 to connect <u>close</u> to Sandon Park and Ride.</i>
Part 6, Policy S9 – Infrastructure	ECC recommend an additional bullet be added to the Transport and Highways section to refer to the Chelmer Waterside access bridge connection.	ECC recommend an additional bullet to read:

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Requirements, Transport and Highways, additional bullet, page 91	<p>The new access road and bridge was granted permission in June 2021 and construction commenced in October 2023. It will link Wharf Road and Parkway, alongside the Essex Record Office and replace the existing Bailey Bridge, which spans the River Chelmer. It will create access to the new housing sites in Chelmer Waterside and provide additional capacity in the road network, which is currently under pressure at the junction of Springfield Road and Navigation Road. The new single span bridge will carry pedestrians, cyclists and vehicles accessing the new neighbourhood. Its purpose is for access only, not as a through route.</p> <p>It is noted that Strategic Policy S17 – Future of Chelmsford City Centre, F. Site Specific Principles: Chelmer Waterside makes reference to the following in bullet 4 and this should be reflected in Policy S9 as an infrastructure requirement to deliver growth in the Plan and for consistency.</p> <ul style="list-style-type: none"> • <i>Deliver local infrastructure for walking, cycling and wider vehicle circulation including a new bridge access incorporating active and sustainable travel modes.</i> 	<ul style="list-style-type: none"> • <u><i>New foot/cycle and vehicular access only bridge linking Wharf Road and Parkway over the River Chelmer</i></u>
Part 6, Policy S9 – Infrastructure Requirements, Paragraph 6.83, page 93	<p>ECC welcome reference to ‘<i>telecommunications and gigabit broadband</i>’ in the Utilities section of the Policy S9.</p> <p>ECC recommend paragraph 6.83 should emphasise that households should be provided with 5G mobile service where possible.</p> <p>The <u>Essex Design Guide - Planning for 5g</u> sets out an agreed process (or accord) between each of the individual Essex LPAs and the Mobile Network Operators (MNOs) to provide an improved planning engagement process to help establish an ongoing and active contact with the MNOs while providing a clear set of expectations for planning applications and make the process as swift and supportive as possible. The guidance requires early, and regularly, engagement in the application process. Seeking meaningful preapplication meetings with the LPA is a prerequisite of this guidance and the application process.</p>	<p>ECC recommend paragraph 6.83 is amended to read:</p> <p><i>Proposals for new developments or expansion of existing properties should be capable of receiving gigabit speed and reliable <u>5G</u> mobile and broadband connectivity.</i></p>
Part 6, Strategic Policy S9 –	<p>ECC note a typographical error regarding bullet 14, which should be separated into two bullets.</p>	<p>ECC recommend bullet 14 should be separated into two bullets to read:</p>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Infrastructure Requirements, Transport and Highways, bullets 14 and 15, page 91		<ul style="list-style-type: none"> • <u>Bus Priority schemes and rapid transit measures.</u> • <u>Improvements to inter-urban public transport.</u>
Part 6, Strategic Policy S9 – Infrastructure Requirements, Green Infrastructure and Natural Environment, page 92	<p>The policy should encourage opportunities to enhance and establish green infrastructure along sustainable transport and the Public Rights of Way networks to both encourage active travel and create a green corridor for wildlife, as long as this does not impede safety and visibility along such routes.</p> <p>Interested parties should work with ECC highways officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users consistent with NPPF, paragraph 136. Reference should be made to the Essex Design Guide: Highways Technical Manual - Planting in sight splays.</p>	<p>ECC recommend an additional bullet point to read:</p> <ul style="list-style-type: none"> • <u>Promote the greening of sustainable transport and Public Rights of Way networks to both encourage active travel and create a green corridor for wildlife.</u>
Part 6, Strategic Policy S9 – Infrastructure Requirements, paragraph 6.87	The Chelmsford North East Bypass and new Park and Rides are two different areas of key infrastructure so it would be worth having them split into two separate points.	<p>ECC recommends that paragraph 6.87 is separated into two paragraphs.</p> <p><i>6.87 The route for the Chelmsford North East Bypass and the location for the new Beaulieu Park Rail Station are allocated on the Policies Map and those areas will be safeguarded from development.</i></p> <p><i>6.88 Areas of search for an additional Park and Ride in West Chelmsford and North East Chelmsford are shown on the Policies Map as indicative broad locations for new Park and Ride facilities which support Essex County Council's strategy.</i></p>
Part 6, Strategic Policy S9 – Infrastructure Requirements, paragraph 6.93	The phasing of the bypass should be clear and the sections and phasing referenced to be consistent.	<p>ECC recommends that the phasing and sections be referenced consistently and that paragraph 6.93 is amended to read as follows:</p> <p><i>When complete, <u>Phase Section</u> 1a and b of the Chelmsford North-East Bypass will provide a new 4.6km</i></p>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
		<i>single carriageway route between Beaulieu Parkway and the A131 at Chatham Green with the existing A131 becoming dual carriageway to the Deres Bridge junction south of Great Leighs.</i>
Part 6, Strategic Policy S9 – Infrastructure Requirements, paragraph 6.99	The submission of the Final Business Case to the DfT is anticipated in Summer 2024.	ECC recommends that paragraph 6.99 is amended to read as follows: <i>6.99 Planning applications were submitted in early 2024 and a Final Business Case anticipated to be submitted to the Department for Transport in Summer 2024, with construction scheduled to start in Spring 2025 and open to traffic in early 2028.</i>
Part 6, Strategic Policy S9 – Infrastructure Requirements, paragraph 6.100	The references to the Route Based Strategies for Mid Essex need updating.	ECC recommends that paragraph 6.100 is amended to read: <i>Route-based strategies have been currently being prepared in Mid and North Essex for consideration of delivery post 2023/24 <u>18/19 include A131 – Chelmsford to Braintree; A131 Braintree to Sudbury, for the A414 Chelmsford to Maldon and A132 South Woodham Ferrers. Their key objective is to identify options that will support economic growth. Improvements include short, medium and long term options and funding to deliver these improvements needs to be secured. Development which will result in increased traffic along these corridors should consider contributions to improvements to these key corridors, or delivery of improvements where they directly impact on the corridor.</u></i>
Part 6, Strategic Policy S9 – Infrastructure Requirements, paragraph 6.102, page 96	ECC recommend the following updated text regarding the preparation of LTP4.	ECC recommend paragraph 6.102 is amended to read: <i>Essex County Council's Local Transport Plan (LTP) sets out a transport policy for Essex, and how Essex County Council will deliver and manage a full range of transport services. The current LTP3 is being updated to reflect the following themes in LTP4: <u>LTP4 will reflect and formally incorporate the revised policy framework contained within Net Zero: Making Essex Carbon</u></i>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
		<p><u>Neutral (ECAC) and the Transport East: Transport Strategy. These place a greater emphasis upon the provision and use of sustainable transport and the decarbonisation of the transport network. LTP4 will cover the period up to 2050 and be based on the following three strategic themes:</u></p> <ul style="list-style-type: none"> • <u>Decarbonisation</u> • <u>Supporting People: Health, Wellbeing and Independence</u> • <u>Creating Sustainable Places and Communities</u> • <u>Connecting People, Places and Businesses.</u>
Part 6, Strategic Policy S10 – Securing Infrastructure and Mitigation, paragraphs 6.104 and 6.105, page 98	<p>ECC supports the widest reasonable definition of infrastructure and infrastructure providers to be applied to Policy S10, as set out in paragraph 6.105.</p> <p>ECC recommend reference is also made to ‘<u>green and blue infrastructure</u>’ to be consistent with other policy requirements in the plan.</p> <p>ECC welcome reference to infrastructure and facilities for specific sections of the community such as younger people or the elderly. ECC has commissioned work to undertake a countywide supported and specialist housing and accommodation needs assessment. ECC consider reference to ‘<u>younger people or the elderly</u>’ in paragraph 105 covers the cohorts set out in the countywide assessment. For clarity, these cohorts for supported and specialist housing and accommodation needs should be set out in the Glossary of Terms.</p>	<p>ECC recommend the definition of infrastructure also includes ‘...<u>green and blue infrastructure</u>’.</p> <p>For clarity, the following cohorts for supported and specialist housing and accommodation should be set out in the Glossary of Terms to read:</p> <p><u>Supported and Specialist Housing Needs - older people, people with a learning disability, autistic/neurodivergent people, young people with learning disability/autism going through transition to adult social care, care leavers, young people with emotional/behavioural difficulties, young children who need residential care, people with serious mental health related needs, people with alcohol/drug addictions, people with a physical/sensory disability (including wheelchair users), victims, survivors and perpetrators of Domestic Abuse, and people with other long-term conditions as named by the Department for Health and Social Care Major Conditions Strategy (2023).</u></p>
Part 6, Strategic Policy S10 – Securing Infrastructure	ECC supports the overarching Policy S10 and reference in paragraph 6.113 requiring applicants being required to consult the ECC Developer’s Guide to Infrastructure Contributions, which sets out ECC’s standards for the receipt of relevant infrastructure funding.	ECC recommend the following text is added to paragraph 6.111 to read:

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
and Mitigation, paragraph 6 and paragraph 6.111 and 6.113, page 99	<p>ECC welcomes reference in paragraph 6 of the policy that in negotiating planning obligations, CCC ‘will take into account local and strategic infrastructure needs and financial viability set out in the Local Plan Infrastructure Delivery Plan (IDP) and Local Plan Viability Assessment’.</p> <p>However, the costs identified in the IDP should not be assumed to be the final costs a developer is required to provide as the costs will change as more details are known through the planning application process and indexation.</p> <p>ECC seeks further clarification in paragraph 6.111 to acknowledge that the IDP is a ‘living’ document, where assessments of costs, funding, delivery and phasing will continue to be updated, in conjunction with further work being undertaken with site promoters, ECC and funding partners. This ongoing review ensures the best and most up-to-date information is available, particularly to inform the more detailed planning application process. The initial cost estimates / projections will also need to be updated to take account of indexation between the date of the IDP and when infrastructure delivery actually occurs. If this is not undertaken then certain schemes may be subject to a funding gap, and the LPA and/or County Council should not be expected to fund any shortfall.</p>	<p><i>The Council has prepared an Infrastructure Delivery Plan (IDP) to inform the Local Plan. This sits alongside the Local Plan and identifies the main items of infrastructure needed to support the planned development and more detail about its phasing, costing and delivery. The IDP is a ‘living’ document, where assessments of costs, funding, delivery, indexation and phasing will continue to be updated, in conjunction with further work being undertaken with site promoters, ECC and funding partners. This ongoing review ensures the best and most up-to-date information is available, particularly to inform the more detailed planning application process.</i></p>
Part 6- Strategic Policy S11 – The Role of the Countryside, paragraph 6.121, page 101	<p>The potential opportunity to encourage the use of the countryside as part of the green infrastructure network, acknowledging the holistic and place specific benefits they provide is welcomed.</p> <p>ECC acknowledges that reference is made to the City Council’s Green Infrastructure Strategic Plan. ECC recommend paragraph 6.121 should also refer to the Essex Green Infrastructure Strategy (2020) (where its preparation included CCC) and the Essex Green Infrastructure Standards Technical Guidance and Essex Green Infrastructure Standards Non-Technical Guidance, which can be found on the EDG website here.</p> <p>Reference should also be made to the Local Nature Recovery Strategy.</p>	<p>ECC recommend paragraph 6.121 includes the following additional sentence to read:</p> <p><i>New development will be required to have regard to the Essex Green Infrastructure Strategy (2020) and the Essex Green Infrastructure Standards Technical Guidance, Essex Green Infrastructure Standards Non-Technical Guidance and Local Nature Recovery Strategy.</i></p>
Part 6, Strategic Policy S12 –	Paragraph 6.125 identifies Beaulieu Neighbourhood Centre as a Principal Neighbourhood Centre.	ECC recommend consideration be given to the following in paragraph 6.125:

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Role of City, Town and Neighbourhood Centres, paragraph 6.125, page 103	Should a similar reference be made to SGS 16a - East Chelmsford Garden Community (Hammonds Farm) or is this subject to more detailed masterplanning? The concept masterplan submitted as part of the Issues and Options consultation does identify the provision of a Local Centre.	<ul style="list-style-type: none"> <u>East Chelmsford Garden Community (Hammonds Farm) Neighbourhood Centre</u>
Part 6, Strategic Policy S17 – Future of Chelmsford City Centre, D. Climate and Sustainability, bullet 2, page 105	<p>ECC support reference to proposals being required to contribute towards sustainable options for accessing the City Centre, but reference should be made in bullet 2 to Park and Ride. It is important to get the right balance between the provision of short-term, long-term and mixed stay parking (including their pricing) and the provision of park and ride.</p> <p>Paragraph 6.101 sets out the ECC's vision for Chelmsford's Future Transport Network and which seeks to remove as much traffic as possible from the outskirts of the City and beyond utilising the existing and potential future Park and Rides at Sandon and Chelmer Valley and other potential locations in West Chelmsford and North East Chelmsford.</p>	<p>ECC recommend bullet 2 is amended to read:</p> <ul style="list-style-type: none"> <i>Take a balanced approach to car parking provision, that acknowledges the sustainability of the City Centre and its walking, cycling, bus <u>(including park and ride)</u> and rail connections</i>
Part 6, Strategic Policy S17 – Future of Chelmsford City Centre, Part G, paragraph 1 and paragraph 6.142, page 107 and 110	<p>ECC welcome that improvements along opportunity corridors can reinforce or create character or identity, including the opportunity for urban greening.</p> <p>ECC recommends that the Urban Greening Factor (UGF) is considered to establish best practice. The UGF is a planning tool to improve the provision of Green Infrastructure particularly in urban areas. While it is voluntary, ECC strongly recommends utilisation of the UGF, and it can significantly contribute to place making, nature recovery, biodiversity enhancement, and connectivity to larger green infrastructure networks within proximity to the development site. More information can be found within the National Green Infrastructure Framework Standards (2023).</p>	<p>ECC recommend paragraph 1 is amended to read:</p> <p><i>Certain areas linking the City Centre to the wider urban area provide an opportunity for improvement in appearance, public realm quality, <u>urban greening</u> and accessibility.</i></p> <p>ECC recommend paragraph 6.142 is amended to read:</p> <p><i>Improvements could include street furniture, public art, and lighting, enhancement of existing buildings or high quality redevelopment, solutions to physical barriers to movement, <u>urban greening</u> and enhanced legibility.</i></p>
Part 6, Strategic Policy S17 – Future of Chelmsford City Centre, G Opportunity	ECC welcome the focus that the Opportunity Corridors approach will bring to city centre economic growth, public realm enhancements and leisure and recreation, which will help to attract inward investment and to support development opportunities.	Reference is made to CCC taking a more flexible approach to changes of use to support positive activity and encourage innovation and investment. Further clarification is required with regards what is meant by 'more flexible'? For example, would the intensification of land uses be an approach given that the corridors are

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Corridors, page 107		characterised by good active and sustainable links to the city centre?
Part 6, Strategic Policy S17 – Future of Chelmsford City Centre, paragraph 6.138, page 109	ECC support the reference to innovative uses providing invaluable support to other local businesses and contribute towards a circular economy. This may include the scope for small scale workspaces and a mix of uses- flexible workspace / affordable workspace / incubator space to support creative/digital industries in the regeneration schemes.	
Part 7, All Strategic Growth and Growth Site Allocation policies providing a new early years and childcare nursery, primary and/or secondary school	<p>ECC welcome reference to specific sites being required to provide new early years and childcare, primary and/or secondary schools, either co-located or stand-alone.</p> <p>ECC recommend the following references are removed from the revised policy requirement as a new school may be delivered by the Department for Education (DfE) itself, developers or most commonly ECC. The policy should also simply refer to land requirements rather than aspects of delivery.</p> <ul style="list-style-type: none"> • <i>‘and the total cost of physical scheme provision with delivery through the Local Education Authority’</i> • <i>‘as required by the Local Education Authority’</i> <p>ECC recommend alternative wording throughout the Strategic and Growth Site Policies which is clearer and makes reference to <i>‘suitable’</i> land being provided, as new sites must be subject to a Land Compliance Study, as set out in the ECC Developers’ Guide, Section 4.3.</p>	<p>ECC recommend all <i>‘Site infrastructure requirements’</i> are reworded along the following format:</p> <ul style="list-style-type: none"> • <i>Land (circa 2.1 hectares) for a co-located primary school (Use Class F1(a))_and early years and childcare nursery (Use Class E(f)) and the total cost of physical scheme provision with delivery through the Local Education Authority.</i> <p>to</p> <ul style="list-style-type: none"> • <i>A new primary school (Use Class F1(a)) with co-located early years and childcare nursery (Use Class E(f)) on 2.1 hectares of suitable land allocated for education and childcare use.</i>
Part 7, All Strategic Growth and Growth Site Allocations policies	<p>ECC note that the <i>‘Site infrastructure requirements’</i> for Strategic and Growth Sites include reference to the potential need to make financial contributions towards early years, primary or secondary. There appears to be an inconsistent requirement throughout site policies with regards what mix of contributions are sought. For example, Policy GR1; Strategic Growth Site Policy 1d; Strategic Growth Site Policy 2 – West Chelmsford Strategic Growth Site Policy 8 – North of Broomfield.</p> <p>ECC seeks clarification as to the inconsistent financial contribution requirements for different sites throughout the plan.</p>	<p>ECC recommend all reference to financial contributions in <i>‘Site infrastructure requirements’</i> are amended to make reference to being sought in accordance with Policy S10.</p> <ul style="list-style-type: none"> • <i>Financial contributions will be sought in accordance with Policy S10.</i> <p>ECC recommend reference in <i>‘Site infrastructure requirements’</i> to financial contributions towards early years, primary and secondary makes reference to being</p>

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	<p>The approach may lead to misinterpretation of requirements, as indicated in the response to SGS Policy 2 (see below), where no reference is made to a requirement for a contribution towards primary or early years and childcare. As worded it could be wrongly interpreted as a requirement on the developer to provide the land for the co-located primary school and early years and childcare nursery with no financial contribution. A primary school contribution is essential for ECC to deliver the primary school, as well as the provision of land.</p> <p>The detailed requirement/amount of developer contributions will be determined at the planning application stage once the detailed housing mix is known and it has been determined that a contribution is necessary consistent with the CIL Regulation 122 tests of necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.</p> <p>ECC considers Strategic Policy S10 – Securing Infrastructure and Impact Mitigation, as carried forward from the adopted Local Plan, should be the policy requirement for securing developer contributions consistent with the ECC Developers’ Guide for Infrastructure Contributions (2023) from relevant sites, which states in paragraph 3.</p> <p><i>Where a development proposal requires additional infrastructure capacity, to be deemed acceptable, mitigation measures must be agreed with the Local Planning Authority and the appropriate infrastructure provider. Such measures may include (not exclusively):</i></p> <ul style="list-style-type: none"> • <i>Financial contributions towards new or expanded facilities and the maintenance thereof</i> • <i>On-site provision (which may include building works)</i> • <i>Off-site capacity improvement works, and/or</i> • <i>The provision of land.</i> 	<p>in accordance with Policy S10. This approach is consistent with IIA Recommendation 1, page 201, which states:</p> <p><u><i>There should be consideration of the fuller cross-referencing to key Development Management policies in Strategic Growth Areas, Growth Areas and Special Area Policies.</i></u></p>
Part 7, All Strategic	ECC seek reference be made in the reasoned justification for those sites providing a new primary or secondary school to providing a safe traffic free	ECC recommend the following sentence is added to policies SGS 2, 6, 7a, 10 and 16a to read:

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Growth and Growth Site Allocations which will provide a new primary and/or secondary school, SGS 2, 6, 7a, 10 and 16a	environment around school pedestrian entrances having regard to the requirements set out in ECC's Developers' Guide to Infrastructure Contributions (Section 5.2 Schools, page 41). Pedestrian entrances should be traffic free not directly bordered by any roads or car parking. These areas do not form part of the school site area and hence the public realm must be well designed and connected with safe direct walking and cycling routes to the communities served.	<u>A safe traffic free environment around school pedestrian entrances must be provided, ensuring access for emergency vehicles only.</u>
Part 7, Strategic Growth Sites <u>(throughout the document)</u>	All sites, throughout the Strategic Growth Policies within the Movement and Access / Site Infrastructure Requirements sections should include reference to: <i>Financial contributions for provision of new and/or enhanced bus services</i>	ECC recommend these references are updated to include: <ul style="list-style-type: none"> • <u>Financial contributions for provision of new and/or enhanced bus services</u>
Part 7, Location 1 – Chelmsford Urban Area, paragraph 7.12, page 114	For consistency with other parts of the plan reference should be made to <i>'active and sustainable travel'</i> .	ECC recommend the final sentence of paragraph 7.12 is amended to read: <i>'..... opportunities for <u>active and sustainable travel</u>'</i>
Part 7, Strategic Growth Site Policy 1a – Chelmer Waterside, page 116	ECC welcome reference to Site CW1c Lockside in <i>'Site infrastructure requirements'</i> being required to provide a new stand-alone early years and childcare nursery, as required in the adopted Local Plan and the approved Chelmer Waterside Framework (October 2021), Conceptual Masterplan (Section 5, page 22). This will be able to accommodate 56 places. ECC recommend reference is made to Use Class E(f) rather than the previous Use Class D1E, as amended in September 2020. For consistency with other parts of the plan reference should be made to <i>'active and sustainable travel'</i> in <i>'Site masterplanning principles'</i> , Movement and access and <i>'Site infrastructure requirements'</i> .	ECC recommend the following amendment with regards Site CW1c -Site infrastructure requirement to read: <ul style="list-style-type: none"> • <u>New 56 place stand-alone early years and childcare nursery (Use Class E(f) on 0.13 hectares of suitable land allocated for education and childcare use.</u> Site masterplanning principles, Movement and access <ul style="list-style-type: none"> • <i>Development that maximises opportunities for <u>active and sustainable travel</u>.</i> Site infrastructure requirements <ul style="list-style-type: none"> • <i>Appropriate measures to promote and enhance <u>active and sustainable modes of transport</u>.</i>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Part 7, Strategic Growth Site Policy 1a – Chelmer Waterside, Design and Layout, bullet 5, page 116	ECC welcomes the reference to the delivery of green infrastructure. If designed right and in the right location green infrastructure can provide multiple social, environment and economic benefits, not just for water and flood management.	ECC recommend bullet 5 is amended to read: <ul style="list-style-type: none"> • <i>Layout to incorporate adequate tree planting and other <u>multifunctional</u> green infrastructure to include natural flood risk and surface water management measures.</i>
Part 7, Strategic Growth Site Policy 1a – Chelmer Waterside, paragraph 7.18	<p>ECC notes that paragraph 7.18 makes reference to the need for a ‘<i>new strategic access route</i>’ to serve Chelmer Waterside linking with Wharf Road to reduce movements at the Springfield Road/Navigation Road junction.</p> <p>ECC recommend the reference to the need for a new ‘strategic access route’ is deleted. Improved accessibility to Chelmer Waterside and the local area is now being provided by other schemes than a single strategic access route as considered in the adopted Local Plan, namely:</p> <ul style="list-style-type: none"> • Chelmer Waterside new access road and bridge (see comments regarding Policy S9, additional bullet) – commenced October 2023 and is being funded by the Housing Infrastructure Fund secured by CCC. • Army and Navy Sustainable Transport Package (ANSTP) (see paragraphs 6.97 - 6.99). The ANSTP has funding through the Government's Major Road Network (MRN) alongside funding from ECC and CCC via CIL. • Upgrades to the Springfield Road/Navigation Road junction as part of the planning agreement for the Peninsula site (commenced 2023) and being funded and delivered as part of the planning agreement for the Peninsula site. 	<p>ECC recommend paragraph 7.18 is amended to read:</p> <p><u>Improved accessibility to Chelmer Waterside and the local area is being provided by the following schemes:</u></p> <ul style="list-style-type: none"> • <u>Chelmer Waterside new access road and bridge enabling enhanced walking, cycling and access only vehicle movements into the linking Wharf Road and Parkway;</u> • <u>Army and Navy Sustainable Transport Package (see paragraphs 6.98 and 6.99); and</u> • <u>Upgrades to the Springfield Road/Navigation Road junction as part of the planning agreement for the Peninsula site.</u>
Part 7, Strategic Growth Site Policy 1b – Former St Peter's College,	<p>ECC recommend an amendment to referencing simply ‘<i>special schools</i>’ to ‘<i>schools providing for Special Needs and Disabilities (SEND)</i>’.</p> <p>The amount of land being transferred to the DfE for the two new schools for Special Needs and Disabilities is as follows:</p>	<p>Amount and type of development</p> <ul style="list-style-type: none"> • <u>Two new schools providing for Special Needs and Disabilities (SEND).</u>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Fox Crescent, page 123	<ul style="list-style-type: none"> • Hawthorns (1.463 hectares) • Sir Geoff Hurst (1.420 hectares) • Total – 2.883 hectares 	<p>Site infrastructure requirements:</p> <ul style="list-style-type: none"> • <u>Two new schools providing for Special Needs and Disabilities (SEND) located on around 2.9 hectares of suitable land allocated for education and childcare use.</u> <p>Amend paragraph 7.44 to read:</p> <p><i>‘...two new schools providing for Special Needs and Disabilities (SEND) for age....’</i></p>
Part 7, Strategic Growth Site Policy 1b – Former St Peter’s College, Fox Crescent, Amount and type of development and paragraph 7.41, page 124	The Approved Masterplan (page 43) identifies specialised residential housing in the form of 60 independent living units, which are in addition to the 185 homes in the policy. This is not currently identified in this policy or the reasoned justification.	<p>ECC recommend an additional bullet point be added to the ‘Amount and type of development’ to read:</p> <ul style="list-style-type: none"> • <u>Around 60 units of specialised supported housing to be confirmed through the planning process.</u> <p>And paragraph 7.41</p> <p><u>The approved Masterplan includes 60 Independent Living units in addition to the circa 185 dwellings proposed.</u></p>
Part 7, Strategic Growth Site Policy 1d – Riverside Ice and Leisure and Victoria Road, Movement and access, bullet 1 and 3, page 128	For consistency with other parts of the plan reference should be made to ‘active and sustainable travel’ and ‘safe and convenient’ in Movement and access bullets 1 and 3	<p>ECC recommend bullets 1 and 3 are amended to read:</p> <ul style="list-style-type: none"> • <u>Development that maximises opportunities for active and sustainable travel</u> • <u>Provide safe and convenient pedestrian and cycle connections.</u>
Part 7, Strategic Growth Site Policy 1d – Riverside Ice and Leisure	Supporting on-site development to be amended and additional point added.	ECC recommends supporting onside development bullet points are amended to read:

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
		<ul style="list-style-type: none"> • <i>Enhanced pedestrian and cycle route links, including contributions towards improvements to or upgrade of Mallard Bridge to facilitate cycling</i> • <i>Enhancement of existing pedestrian and cycle routes within and adjacent to the site including width and alignment, surfacing, drainage, signage and lighting improvements as appropriate</i>
Part 7, Strategic Growth Site Policy 1e, Civic Centre Land, Fairfield Road	<p>To support current and proposed growth in Chelmsford and to maximise active and sustainable travel, to reduce the impact on the congested city centre road network, ECC have commenced work on the Chelmsford Transport Interchange Project.</p> <p>ECC have undertaken initial stages of work and identified that to maximise the opportunities for the bus and railway station to become a multi-modal transport interchange and to encourage increased use of the bus services, expansion of the bus station is required.</p> <p>ECC have engaged CCC officers and Members on this project and acknowledge that although there is support for the project in principle, there are concerns regarding an access road through the development site.</p> <p>ECC hope that the proposed additions to this site policy allow us to progress this project with consideration of the development in this location with the appropriate 'hooks' to enable both elements to complement each other and enable increased capacity at the bus station to support sustainable growth in Chelmsford.</p>	<p>ECC recommends that reference is made to the Chelmsford Transport Interchange Project within the site policy and Reasoned Justification:</p> <p>Site Policy – Movement and Access:</p> <ul style="list-style-type: none"> • <i>Development that maximises opportunities for sustainable travel and supports sustainable travel in Chelmsford City Centre</i> • <i>Consideration of bus access through the development to support expansion of the bus station as part of the Chelmsford Transport Interchange project.</i> <p>Reasoned Justification:</p> <p>New paragraph:</p> <p><i><u>7.xx To support proposed growth in Chelmsford and to maximise active and sustainable travel, to reduce the impact on the congested city centre road network, Essex County Council have commenced work on the Chelmsford Transport Interchange Project. Essex County Council have undertaken initial stages of work and identified that to maximise the opportunities for the bus and railway station to become a multi-modal transport interchange and to encourage increased use of the bus services, expansion of the bus station is required. This site should give consideration to the proposals for the Chelmsford Transport Interchange</u></i></p>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
		<u>project and work with Essex County Council to progress and facilitate this project.</u>
Part 7, Strategic Growth Site Policy 1e – Civic Centre Land, Fairfield Road, Movement and access, bullet 1 and 3, page 130	For consistency with other parts of the plan reference should be made to <i>`active and sustainable travel`</i> and <i>`safe and convenient`</i> in Movement and access bullet 1 and 3.	ECC recommend bullets 1 and 3 are amended to read: <ul style="list-style-type: none"> • <i>Development that maximises opportunities for <u>active and sustainable travel</u></i> • <i>Provide <u>safe and convenient</u> pedestrian and cycle connections.</i>
Part 7, Strategic Growth Site Policy 1f – Eastwood House Car Park, Glebe Road, Movement and access, bullets 1 and 3, page 132	For consistency with other parts of the plan reference should be made to <i>`active and sustainable travel`</i> and <i>`safe and convenient`</i> in Movement and access bullets 1 and 3.	ECC recommend bullets 1 and 3 are amended to read: <ul style="list-style-type: none"> • <i>Development that maximises opportunities for <u>active and sustainable travel</u></i> • <i>Provide <u>safe and convenient</u> pedestrian and cycle connections.</i>
Part 7, Policy GR1 – Growth Sites in Chelmsford City Centre/Urban Area, Movement and access, bullet 1 and 2 and Site infrastructure requirements, bullet 2, page 138	For consistency with other parts of the plan reference should be made to <i>`active and sustainable travel`</i> , in Movement and access and Site infrastructure requirements and <i>`safe and convenient`</i> in Site infrastructure requirements.	ECC recommend bullets 1 and 2 in Movement and Access are amended to read: <ul style="list-style-type: none"> • <i>Development that maximises opportunities for <u>active and sustainable travel</u></i> • <i>Provide <u>safe and convenient</u> pedestrian and cycle connections.</i> And Site infrastructure requirements <ul style="list-style-type: none"> • <i>Appropriate measures to promote and enhance <u>active and sustainable modes of transport.</u></i>
Part 7, Growth Site Policy 1q – Rear of 17 to 37	For consistency with other parts of the plan reference should be made to <i>`safe and convenient`</i> pedestrian and cycle access in bullet 3.	ECC recommend bullet 3 is amended to read:

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Beach's Drive, bullet 3, page 145		<ul style="list-style-type: none"> <i>Safe and convenient pPedestrian and cycle access should be created into Admirals Park at the south-east of the site to connect to safe pedestrian/cycle routes to the City Centre to the east and wider countryside to the west.</i>
Part 7, Growth Site Policy 1r – Garage Site, St Nazaire Road, bullet 3, page 145	For consistency with other parts of the plan reference should be made to ' <i>safe and convenient</i> ' pedestrian link in bullet 3.	<p>ECC recommend bullet 3 is amended to read:</p> <ul style="list-style-type: none"> <i>New <u>safe and convenient</u> pedestrian link to the existing pedestrian/cycle route network.</i>
Part 7, Growth Site Policy 1u – Rivermead, Bishop Hall Lane, bullet 2, page 147	For consistency with other parts of the plan reference should be made to ' <i>safe and convenient</i> ' connections in bullet 2.	<p>ECC recommend bullet 2 is amended to read:</p> <ul style="list-style-type: none"> <i>New bridges to Anglia Ruskin University and Springfield Hall Park to the east for <u>safe and convenient</u> connections to pedestrian and cycle network, and improved pedestrian and cycle connection to Bishop Hall Lane.</i>
Part 7, Growth Site Policy 1v – Railway Sidings, Brook Street, bullet 2, page 147	For consistency with other parts of the plan reference should be made to ' <i>safe and convenient</i> ' in bullet 2.	<p>ECC recommend bullet 2 is amended to read:</p> <ul style="list-style-type: none"> <i><u>Safe and convenient</u> Improved pedestrian and cycle routes.</i>
Part 7, Strategic Growth Site Policy 1w – Meadows Shopping Centre and Meadows Surface Car Park	<p>ECC recommend reference is made requiring the 350 home development to make a contribution to early years and childcare, primary and secondary education to be consistent with other policies in the plan.</p> <p>ECC recommend reference is made to parking provision and bus services.</p> <p>ECC seek clarification regarding the intention of the parking provision and require clarification of what the '<i>alternative provision</i>' would be. If this is provision through other modes, this should be referenced.</p>	<p>ECC recommend Movement and Access and Site Infrastructure Requirements includes additional bullet points to read:</p> <ul style="list-style-type: none"> <i>Onsite or financial contributions will be sought in accordance with Policy S10.</i> <i><u>Provision of new and/or enhanced bus services.</u></i> <p>And that the following bullet points be amended to read:</p>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
		<ul style="list-style-type: none"> • Existing city centre public car park to be compensated for by alternative provision (<u>via other sustainable modes</u>) if removed. • Resilience measures to ensure approach to parking is sustainable and will not give rise to issues of overspill. <u>Should overspill occur mitigation measures to be provided by the developer.</u> • Enhancement of existing pedestrian and cycle routes within the site including <u>widening and realignment, surfacing, drainage, signage and lighting as appropriate.</u>
Part 7, Strategic Growth Site Policy 1w – Meadows Shopping Centre and Meadows Surface Car Park, Historic and natural environment, bullet 6	ECC welcomes the reference to the delivery of green infrastructure. If designed right and in the right location green infrastructure can provide multiple social, environment and economic benefits, not just for water and flood management.	<p>ECC recommend bullet 6 is amended to read:</p> <ul style="list-style-type: none"> • Development to include abundant street planting and other <u>multifunctional</u> green infrastructure.
Part 7, Strategic Growth Site Policy 1b – Former St Peter's College, Fox Crescent, Design and Layout bullet 4	ECC recommend reference to green infrastructure and nature recovery networks should be added to 'Design and Layout' bullet point 4. All developments should contribute to the green infrastructure network.	<p>ECC recommend bullet 4 is amended to read:</p> <ul style="list-style-type: none"> • Retention and enhancement of existing natural features to create distinctive landscape character, <u>that contributes to the wider green infrastructure and nature recovery networks.</u>
Part 7, Strategic Growth Site Policy 1x – Former Kay-Metzeler	ECC recommend reference to green infrastructure and nature recovery networks should be added to 'Design and Layout' bullet point 5. All developments should contribute to the green infrastructure network.	<p>ECC recommend bullet 5 is amended to read:</p> <ul style="list-style-type: none"> • Retention and enhancement of existing natural features to create distinctive landscape character,

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Premises, Brook Street, Design and Layout bullet 5		<u>that contributes to the wider green infrastructure and nature recovery networks.</u>
Part 7, Strategic Growth Site Policy 1x – Former Kay-Metzeler Premises, Brook Street, paragraph 7.55, 2 nd sentence	Suggested amendment to correct a Typographical error.	ECC recommend paragraph 7.55, 2 nd sentence is amended to read: <i>A residential travel plan will be required to ensure sustainable and active and sustainable means of travel are available to all new residents, to reduce the need to travel and encourage the use of non-car modes.</i>
Part 7, Strategic Growth Site Policy 1f – Eastwood House Car Park, Glebe Road, Design and Layout, bullet 3	ECC recommend reference to green infrastructure and nature recovery networks should be added to ‘Design and Layout’ bullet point 3. All developments should contribute to the green infrastructure network.	ECC recommend bullet 3 should be amended to read: <ul style="list-style-type: none"> <i><u>Landscape design incorporating tree planting, flood risk and surface water management and other multifunctional green infrastructure, that contributes to the wider green infrastructure and nature recovery networks.</u></i>
Part 7, Strategic Growth Site Policy 1y – Land Between Hoffmanns Way and Brook Street (Marriage’s Mill), Historic and Natural Environment or Design and Layout, additional bullet	ECC recommend reference to green infrastructure and nature recovery networks should be added to ‘Design and Layout’ additional bullet point. All developments should contribute to the green infrastructure network.	ECC recommend an additional bullet to read: <ul style="list-style-type: none"> <i><u>Landscape design incorporating tree planting, flood risk and surface water management and other multifunctional green infrastructure, that contributes to the wider green infrastructure and nature recovery networks.</u></i>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Part 7, Policy GR1 – Growth Sites in Chelmsford City Centre/Urban Area, Movement and Access, additional bullet.	ECC recommend an additional bullet requiring sites to enhance the existing pedestrian and cycle routes.	ECC recommend an additional bullet point: <ul style="list-style-type: none"> <u>Enhancement of existing pedestrian and cycle routes within and adjacent to the site including width and alignment, surfacing, drainage, signage and lighting improvements as appropriate.</u>
Part 7, Policy GR1 – Growth Sites in Chelmsford City Centre/Urban Area, Historic and Natural Environment, additional bullet.	ECC recommend reference to green infrastructure and nature recovery networks should be added to ‘Design and Layout’ additional bullet point. All developments should contribute to the green infrastructure network.	ECC recommend an additional bullet that could read as follows: <ul style="list-style-type: none"> <u>Landscape design incorporating tree planting, flood risk and surface water management and other multifunctional green infrastructure, that contributes to the wider green infrastructure and nature recovery networks.</u>
Part 7, Strategic Growth Site Policy 6 – North East Chelmsford (Chelmsford Garden Community), paragraph 1 of the policy and paragraph 7.222 and 7.223.	For consistency with other parts of the plan reference should be made to ‘ <i>active and sustainable travel</i> ’ in paragraph 1 of the policy and 7.222 and 7.223 of the reasoned justification.	ECC recommend paragraph 1 is amended to read: <p><i>‘..... maximise opportunities for <u>active and sustainable travel</u>, in a landscaped setting’.</i></p> <p>ECC recommend paragraph 7.222 and 7.223 is amended to read:</p> <p><i>The development will be large enough to support its own car club and there will be alternative means of <u>active and sustainable</u> transport available to residents to complement it.</i></p> <p><i>‘..... maximise opportunities for <u>active and sustainable</u> transport modes to be taken up to create neighbourhoods where alternative forms of transport to the private car (walking, cycling and public transport) are prioritised’.</i></p>
Part 7, SGS 6 North East	The site is to provide for around 9ha or 59,946sqm of dedicated employment land.	ECC recommend paragraph 7.215 should be amended to read:

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Chelmsford (Chelmsford Garden Community), Amount and type of development, bullet 2 and paragraph 7.215	<p>The Economic Strategy produced by Lichfields for the North East Chelmsford Garden Community highlights the importance of an early critical mass in increasing deliverability of later phases. Should there be a policy or reasoned justification reference to the need for a critical mass of serviced land and employment floorspace to be delivered as early as possible, to prove demand and values and thereby de-risk the deliverability of later phases?</p> <p>The reasoned justification can strengthen the importance of this strategic site for inward investment and meeting regional sector growth objectives.</p> <p>The reasoned justification could also make reference to the critical success factors for an Innovation Park.</p>	<p><u>The agglomeration impact of additional Research and Development/High Technology Sectors which supports the economic development aims of partners, would support increased inward investment supporting the aims of making Chelmsford the forefront of 21st century economic development in Essex and beyond.</u></p> <p><u>An Innovation Park should be supported with appropriate innovation 'ecosystem' for example a specialist innovation centre, business support, innovation programmes and links to anchor research organisations.</u></p>
Part 7, SGS 6 North East Chelmsford (Chelmsford Garden Community), Amount and type of development, bullet 2 and paragraph 7.217	<p>The reasoned justification could be strengthened by providing details on the links to sector and skills development.</p> <p>Reference to the type of employment uses could be widened to include employment uses in residential-led mixed use areas to support remote and flexible working.</p>	<p>ECC recommend paragraph 7.217 makes reference to:</p> <p><u>Development should provide a mix of employment units that aligns with a clear sectoral strategy, meeting both the occupier requirements and stimulating further demand.</u></p> <p><u>It is important to include education and skills facilities within the complementary uses, providing sustainable connections between employment, education and skills to ensure development of local people.</u></p> <p><u>In addition to stand-alone employment sites, incorporation of employment uses within mixed use areas can support remote and flexible working. For example, small affordable workspace/maker space/studios, live-work space."</u></p>
Part 7, SGS 6 North East Chelmsford (Chelmsford Garden Community),	ECC has undertaken a full housing scenario assessment of the Preferred Approach in accordance with the methodology set out in ECC Local and Neighbourhood Planners Guide to School Organisation, Section 3.4 Testing the Preferred Option, page 8. The land requirements are set out in the <i>ECC Developers' Guide for Infrastructure Contributions (2023)</i> , Table 1: Early Years Facility Land Requirement, page 31, Table 5: Primary School	<p>ECC recommend 'Supporting on site development' bullet 7 is amended to read:</p> <ul style="list-style-type: none"> • Provision of four <u>two</u> new stand-alone early years and childcare nurseries

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Supporting on site development, bullet 7 and Site Infrastructure Requirements, bullets 1,2 and 3 and paragraph 7.216.	<p>Land Requirement and Table 6: Secondary school land requirement (ages 11 -18), pages 36 and 37.</p> <p>ECC has also provided responses to the approved masterplan (Ref:22/00001/MAS) and the submitted outline planning applications to which there are presently 'Holding Objections'.</p> <p>In response to these outline applications ECC is seeking the following provisions:</p> <p>Zone 1 (Ptarmigan Land – 1,500 homes)</p> <ul style="list-style-type: none"> a new primary school co located with 56 place early years and childcare nursery on 2.4 ha stand-alone 56 place early years and childcare nursery on 0.13 ha. <p>Zone 2 (Countryside 3,500 homes)</p> <ul style="list-style-type: none"> all through school, including primary and early years and childcare on 12.15 ha two 2FE primary schools co-located with early years and childcare on 2.1 ha three stand alone 56 place early years and childcare each on 0.13 ha. <p>Zone 3 (Halley Developments – 1,250 homes)</p> <ul style="list-style-type: none"> No education provision <p>In Summary for all Zones</p> <ul style="list-style-type: none"> An all through Secondary school (including primary/early years) Three further primary schools (including early years) Four stand alone early years <p>An amendment is also recommended to reasoned justification, paragraph 7.216 accordingly to refer to 'four' stand-alone nurseries.</p>	<p>ECC recommend 'Site infrastructure requirements', bullets 1, 2 and 3 are replaced with:</p> <ul style="list-style-type: none"> <u>A new all-through school (Use Class F1(a), including secondary, primary and early years, on 12.15 hectares of suitable land allocated for education and early years and childcare use (Use Class E(f)).</u> <u>Three further new primary schools (Use Class F1(a) with co-located early years and childcare nursery (Use Class E(f)) with one site of 2.4 hectares and two of 2.1 hectares of suitable land allocated for education and childcare use</u> <u>Four new 56 place stand-alone early years and childcare nurseries (Use Class E(f)) each on 0.13 hectares of suitable land allocated for education and childcare use</u> <p>ECC recommend paragraph 7.216 is amended to read:</p> <p><i>A wide range of new community services and facilities including a new all through school (including primary with co-located early years, secondary and potentially a sixth form centre), three new primary schools with co-located early years and at least two four standalone nurseries, open spaces, recreation, sport and play facilities, community facilities and mixed use village centres will need to be provided on the site.</i></p>
Part 7, SGS 6 North East Chelmsford (Chelmsford	For consistency with other parts of the plan reference should be made to ' <i>safe and convenient</i> '.	<p>ECC recommend bullet 5 is amended to read:</p> <ul style="list-style-type: none"> <i>Provide <u>safe and convenient</u> pedestrian, cycle and where appropriate bridleway connections.....'</i>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Garden Community), Movement and Access, bullet 5 and paragraph 7.221		<p>ECC recommend paragraph 7.221 is amended to read:</p> <p><i>'The development will be expected to provide additional and improved <u>safe and convenient</u> pedestrian, cycle and where appropriate bridleway connections....'</i></p>
Part 7, SGS 6 North East Chelmsford (Chelmsford Garden Community), Historic and Natural Environment, bullet 1	ECC recommend reference is made to ' <i>multifunctional</i> ' green infrastructure to ensure consistency throughout the Plan.	<p>ECC recommend bullet 1 is amended to read:</p> <ul style="list-style-type: none"> • <i>Provide a network of <u>multifunctional</u> green infrastructure to mitigate the visual, biodiversity and heritage impacts of the development.</i>
Part 7, SGS 6 North East Chelmsford (Chelmsford Garden Community), Movement and Access, paragraph 8, 7.234 and 7.235.	Given the climate emergency declared by the City Council and the global climate crisis, ECC recommend the policy is more positive <u>requiring</u> the development to provide renewable, low carbon and decentralised energy schemes on site. This is consistent with the principles set out in the approved Development Framework Document, which is underpinning the subsequent detailed planning applications.	<p>ECC recommend paragraph 8 is amended to read:</p> <p><i>'The Council will <u>require</u> encourage the appropriate development of renewable, low carbon and decentralised energy schemes....'</i></p> <p>ECC recommend paragraph 7.234 is amended to read:</p> <p><i>'Given the scale and nature of the development, the Council will <u>require</u> encourage the appropriate development of renewable, low carbon and decentralised energy schemes....'</i></p> <p>ECC recommend paragraph 7.235 is amended to read:</p> <p><i>'As this is a major new development site, where appropriate the Council will <u>require</u> encourage a move away from traditional wheeled bins to mass waste collection systems, such as an underground waste system.</i></p>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Part 7, SGS 6 North East Chelmsford (Chelmsford Garden Community), Stewardship, additional bullet.	<p>ECC welcomes the early recognition of stewardship as a key factor in the success of the planning and delivery of the site. ECC would emphasise that considerations around Stewardship should be integral to the approach taken by the development planning strategy from first principles. A long-term strategy on how services, infrastructure and features which are used to mitigate impacts, can be maintained and sustained is essential. For example, a Parking Strategy must be shown to be enforceable. Facilities such as mobility hubs will require both revenue and capital to ensure their long-term sustainability. Cycle paths and footways should be kept clear of overgrowing vegetation etc.</p> <p>ECC recommend reference is made to include a requirement for stewardship activities to be in place for the first housing occupations to ensure timely delivery of community development activities. Otherwise, there is a risk that investment is not provided until a critical threshold of service charge receipts is reached - in other words stewardship activities will need some form of forward funding to be operational at the point when it is most needed. Community development activities could involve areas such as encouraging public transport and active travel so it helps deliver other policy areas too. Consideration will be needed regarding management and maintenance of any green infrastructure, as well as any biodiversity habitat enhancements as part of the Biodiversity Gain Plan.</p>	<p>ECC recommend an additional bullet be added requiring stewardship activities to be in place for the first housing occupations to ensure timely delivery of community development activities.</p> <ul style="list-style-type: none"> • <u>stewardship activities are required to be in place in advance of the first housing occupations to ensure timely delivery of community development activities.</u>
Part 7, SGS 6 North East Chelmsford (Chelmsford Garden Community), Stewardship, additional bullet.	<p>ECC recommend reference is made to include a requirement for an Asset Schedule to be prepared by applicants with the express agreement of CCC and ECC. The Asset Schedule should list all the public assets within the Garden Community and set out who will own them and who will be responsible for their management and maintenance. The Asset Schedule should form part of the Stewardship Strategy and is needed so as to be clear on the roles and responsibilities of all parties in ensuring good quality place-keeping.</p> <p>A clearly defined approach to adoption (i.e. those streets and places which are owned and maintained by the Local Authority) will need to be defined by the planning process and the relevant standards applied at that point. All proposals and interventions should be assessed against long-term resilience criteria – maintainability, ownership, cost, longevity. A clear</p>	<p>ECC recommend reference is made to include a requirement for an Asset Schedule to be prepared by applicants with the express agreement of relevant partners (for example CCC and ECC).</p> <ul style="list-style-type: none"> • <u>an Asset Schedule is required, as part of the Stewardship Strategy, listing the public assets outlining their management and maintenance, to be agreed with relevant partners.</u>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
	structure for managing ongoing Stewardship should be agreed at the point of planning permission and should include a Transport Review Group.	
Part 7, SGS 6 North East Chelmsford (Chelmsford Garden Community), Stewardship, paragraph 7.211.	<p>ECC recommend '<i>resident engagement</i>' is amended to '<i>community engagement</i>' to imply broader engagement with local businesses, organisations, community groups, etc as well as residents.</p> <p>ECC recommend '<i>to deliver the vision for the Garden Community</i>' is better phrased as '<i>to act as the custodian of the Garden Community vision once development is completed</i>'.</p>	<p>ECC recommend paragraph 7.211 is amended to read:</p> <p><i>The expectation is that the newly formed Chelmsford Garden Community would have a defined remit in stewardship across the whole Garden Community area to foster collaboration, create accountability, provide consistency and ensure <u>community</u> resident engagement.</i></p> <p><i>A single not-for-profit Stewardship Body would be formed to work in partnership with the Garden Community Council to provide a co-ordinating role to stewardship, place making and community development and <u>to act as the custodian of deliver the vision for the Garden Community vision once development is completed.</u></i></p>
Part 7, SGS 6 North East Chelmsford (Chelmsford Garden Community), paragraph 7.207.	ECC recommend reference is made to the approved ' <i>Development Framework Document</i> ' rather than masterplan, which is guiding the subsequent planning application process.	<p>ECC recommend paragraph 7.207 is amended to read:</p> <p><i>The development has an approved <u>Development Framework Document</u> masterplan (Ref:22/00001/MAS) and outline planning applications have been submitted (Refs:22/01950/FUL, 22/01950/OUT, 23/00124/FUL and 23/00124/OUT). 2025 and 2039.</i></p>
Part 7, Strategic Growth Site Policy 7a – Great Leighs – Land at Moulsham Hall, paragraph 1	For consistency with other parts of the plan reference should be made to ' <i>active and sustainable travel</i> ' in paragraph 1 of the policy.	<p>ECC recommend paragraph 1 is amended to read:</p> <p><i>'.... that maximises opportunities for <u>active and sustainable travel</u>'.</i></p>
Part 7, Strategic Growth Site	ECC supports the reference in ' <i>Supporting on-site development</i> ' regarding ' <i>Provision of a new primary school with co-located early years and childcare</i>	ECC recommend bullet 1 is amended to read:

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Policy 7a – Great Leighs – Land at Moulsham Hall, Supporting on site development, bullet 2 and 3 and Site infrastructure requirements, bullet 1	<p><i>nursery.</i>’ and its location close to existing links across/under A131 to connect to Great Leighs.</p> <p>ECC recommend ‘<i>Site infrastructure requirements</i>’, bullet 1 is amended to reflect ECC preferred wording.</p>	<ul style="list-style-type: none"> • <u><i>A new primary school (Use Class F1(a)) with co-located early years and childcare nursery (Use Class E(f)) on 2.1 hectares of suitable land allocated for education and childcare use.</i></u>
Part 7, Strategic Growth Site Policy 7a – Great Leighs – Land at Moulsham Hall, Movement and access, bullet 2 and paragraph 7.252	For consistency with other parts of the plan reference should be made to ‘ <i>safe and convenient</i> ’ in bullet 2 and paragraph 7.252.	<p>ECC recommend bullet 2 is amended to read:</p> <ul style="list-style-type: none"> • <i>Provide <u>safe and convenient</u> pedestrian and cycle connections to the existing Village of Great Leighs</i> <p>ECC recommend paragraph 7.252 is amended to read:</p> <p><i>‘Additional <u>safe and convenient</u> pedestrian and cycle connections should also be provided’</i></p>
Part 7, Strategic Growth Site Policy 7a – Great Leighs – Land at Moulsham Hall, Historic and Natural Environment, bullet 6 and paragraph 7.257	ECC recommend reference is made to ‘ <i>multifunctional</i> ’ green infrastructure to ensure consistency throughout the Plan.	<p>ECC recommend bullet 6 is amended to read:</p> <ul style="list-style-type: none"> • <i>Create a network of <u>multifunctional</u> green infrastructure</i> <p>ECC recommend paragraph 7.257 is amended to read:</p> <p><i>This shall include a comprehensive and coherent network of <u>multifunctional</u> green infrastructure, formal and informal recreation and community spaces.</i></p>
Part 7, Strategic Growth Site Policy 7a – Great Leighs –	ECC recommend separating out the need for financial contributions to the North East Bypass and education.	<p>ECC recommend separating out bullet 7 to read:</p> <ul style="list-style-type: none"> • <u><i>Financial contributions to delivery of the Chelmsford North East Bypass.</i></u>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Land at Moulsham Hall, Site infrastructure requirements, bullet 7	Please refer to overarching comment regarding financial contributions to early years, primary and secondary education.	
Part 7, Strategic Growth Site Policy 7a – Great Leighs – Land at Moulsham Hall, paragraph 7.249	ECC recommend paragraph 7.249 is amended to provide clarification.	<p>ECC recommend paragraph 7.249 is amended to read:</p> <p><i>Great Leighs primary school is full, and forecast to <u>this is likely to remain the case in most year groups so</u>. The scale of development in this location will require a new primary school with co-located early years and childcare nursery <u>provision</u>. The developer will be expected to provide the land and total <u>the</u> cost of the physical scheme <u>in line with the ECC Developers' Guide to Infrastructure Contributions</u> provision with delivery through the Local Education Authority. A comprehensive approach will be necessary to <u>facilitate the option to deliver this new school early on in the development, and potentially ahead of development of site 7c: Great Leighs – Land North and South of Banters Lane</u>. The nearest secondary schools to Great Leighs are located in Braintree town. The City Council together with Braintree District Council and Essex County Council (as <u>the appropriate Local Education Authority for Education</u>) have jointly considered the potential implications arising from both Chelmsford's and Braintree's emerging <u>adopted</u> Local Plans, and the provision of secondary school <u>places</u> provision. Proposals for the future expansion of Notley High School in Braintree can provide secondary place capacity for this site allocation. Efforts should therefore be made to provide safe and direct walking and cycling routes between Great Leighs and Notley High School in Braintree.</i></p>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Part 7, Strategic Growth Site Policy 7a, Movement and Access, bullet 3	ECC recommend bullet 3 is amended to reference 'good accessibility for buses' rather than 'bus priority measures'. The latter requires dedicated road space, which is not being proposed at this site.	ECC recommend bullet 3 is amended to read: <ul style="list-style-type: none"> • <i>Provide a well-connected <u>and integrated internal road layouts which allows good accessibility for bus services</u> priority measures.</i>
Part 7, Strategic Growth Site Policy 7b – Great Leighs Land East of London Road	In summarising the amount and type of development the policy makes reference to around 190 new specialist residential homes for older persons to <u>include affordable housing</u> . However, the reasoned justification to Policy DM1 in paragraph 8.16 states that ' <i>Specialist Residential Accommodation will not be considered as an alternative to, or replacement for, the affordable housing requirements set out in Policy DM2.</i> '	ECC seeks further clarification regarding the following: <ul style="list-style-type: none"> • Is affordable housing that isn't specialist residential accommodation expected to be provided on Site 7b? • If a site is 100% specialist residential accommodation is that expected to also provide affordable housing in order to be policy compliant?
Part 7, Strategic Growth Site Policy 7b – Great Leighs - Land East of London Road, paragraph 1	For consistency with other parts of the plan reference should be made to ' <i>active and sustainable travel</i> ' in paragraph 1 of the policy	ECC recommend paragraph 1 is amended to read: <p><i>'..... maximises opportunities for <u>active and sustainable travel</u>, specifically for older persons'.</i></p>
Part 7, Strategic Growth Site Policy 7b – Great Leighs - Land East of London Road, Movement and Access, bullet 2 and paragraph 7.263	Any Transport Assessment for the site may identify the need to enhance existing bus service provision and/or its timetabling.	ECC recommend paragraph 7.263 is amended to read: <p><i>There is <u>currently</u> also a good frequency of bus services connecting into Chelmsford City Centre and Braintree, but any enhancements should be funded by the <u>developer</u>.</i></p>
Part 7, Strategic Growth Site Policy 7b – Great Leighs - Land East of London Road,	For consistency with other parts of the plan reference should be made to ' <i>safe and convenient</i> ' in bullet 2 and paragraph 7.265.	ECC recommend bullet 2 is amended to read: <ul style="list-style-type: none"> • <i>Provide <u>safe and convenient pedestrian and cycle connections to the existing Village of Great Leighs</u></i> <p>ECC recommend paragraph 7.265 is amended to read:</p>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Movement and Access, bullet 2 and paragraph 7.265		<i>`Additional <u>safe and convenient</u> pedestrian and cycle connections should also be provided`</i>
Part 7, Strategic Growth Site Policy 7b – Great Leighs - Land East of London Road, Historic and Natural Environment, bullet 5 and paragraph 7.269	ECC recommend reference is made to <i>`multifunctional`</i> green infrastructure to ensure consistency throughout the Plan.	<p>ECC recommend bullet 5 is amended to read:</p> <ul style="list-style-type: none"> • Create a network of <u>multifunctional</u> green infrastructure. <p>ECC recommend paragraph 7.269 is amended to read:</p> <p><i>This shall include a comprehensive and coherent network of <u>multifunctional</u> green infrastructure, formal and informal recreation and community spaces.</i></p>
Part 7, Strategic Growth Site Policy 7c – Great Leighs – Land North and South of Banters Lane, paragraph 1	For consistency with other parts of the plan reference should be made to <i>`active and sustainable travel`</i> in paragraph 1 of the policy	<p>ECC recommend paragraph 1 is amended to read:</p> <p><i>`.... that maximises opportunities for <u>active and sustainable travel</u>, specifically for older persons`.</i></p>
Part 7, Strategic Growth Site Policy 7c – Great Leighs – Land North and South of Banters Lane, Movement and Access, bullet 2 and paragraph 7.280	For consistency with other parts of the plan reference should be made to <i>`safe and convenient`</i> in bullet 2 and paragraph 7.280.	<p>ECC recommend bullet 2 is amended to read:</p> <ul style="list-style-type: none"> • Provide <u>safe and convenient</u> pedestrian and cycle connections to the existing Village of Great Leighs <p>ECC recommend paragraph 7.280 is amended to read:</p> <p><i>`Additional <u>safe and convenient</u> pedestrian and cycle connections should also be provided ...`</i></p>
Part 7, Strategic Growth Site Policy 7c –	ECC recommend reference is made to <i>`multifunctional`</i> green infrastructure to ensure consistency throughout the Plan.	ECC recommend bullet 5 is amended to read:

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Great Leighs – Land North and South of Banters Lane, Historic and Natural Environment, bullet 5 and paragraph 7.284		<ul style="list-style-type: none"> • Create a network of <u>multifunctional</u> green infrastructure. <p>ECC recommend paragraph 7.284 is amended to read:</p> <p><i>This shall include a comprehensive and coherent network of <u>multifunctional</u> green infrastructure, formal and informal recreation and community spaces.</i></p>
Part 7, Strategic Growth Site Policy 7c – Great Leighs – Land North and South of Banters Lane, Site infrastructure requirements, bullet 6	ECC recommend separating out the need for financial contributions to the North East Bypass and education.	<p>ECC recommend separating out bullet 6 to read:</p> <ul style="list-style-type: none"> • <u>Financial contributions to delivery of the Chelmsford North East Bypass</u>
Part 7, Strategic Growth Site Policy 7b – Great Leighs - Land East of London Road, Movement and Access, bullet 2 and paragraph 7.276	Any Transport Assessment for the site may identify the need to enhance existing bus service provision and/or its timetabling.	<p>ECC recommend paragraph 7.276 is amended to read:</p> <p><i>There is <u>currently</u> also a good frequency of bus services connecting into Chelmsford City Centre and Braintree, <u>but any enhancements should be funded by the developer.</u></i></p>
Part 7, Strategic Growth Site Policy 8 – North of Broomfield, paragraph 1	For consistency with other parts of the plan reference should be made to ‘ <i>active and sustainable travel</i> ’ in paragraph 1 of the policy	<p>ECC recommend paragraph 1 is amended to read:</p> <p><i>‘.....that maximises opportunities for <u>active and sustainable travel</u>’.</i></p>
Part 7, Strategic Growth Site	ECC supports bullet 2 in ‘ <i>Supporting on-site development</i> ’ which states ‘Provision of a new stand-alone early years and childcare nursery located	ECC recommend bullet 1 is amended to read:

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Policy 8 – North of Broomfield, Site infrastructure requirements, bullet 1	<p>in the southern portion of the site’ and is consistent with the approved masterplan.</p> <p>However, ECC recommend ‘<i>Site infrastructure requirements</i>’, bullet 1 is amended to reflect ECC preferred wording.</p>	<ul style="list-style-type: none"> • <u>New 56 place stand-alone early years and childcare nursery (Use Class E(f)) on 0.13 hectares of suitable land allocated for education and childcare use.</u>
Part 7, Strategic Growth Site Policy 8 – North of Broomfield, Movement and Access, bullet 3	For consistency with other parts of the plan reference should be made to ‘ <i>safe and convenient</i> ’ in bullet 3	<p>ECC recommend bullet 3 is amended to read:</p> <ul style="list-style-type: none"> • Provide <u>safe and convenient</u> pedestrian and cycle connections.
Part 7, Strategic Growth Site Policy 8 – North of Broomfield, Movement and Access, bullet 4	ECC recommend bullet 3 is amended to reference ‘good accessibility for buses’ rather than ‘bus priority measures’. The latter requires dedicated road space, which is not being proposed at this site.	<p>ECC recommend bullet 4 is amended to read:</p> <ul style="list-style-type: none"> • Provide <u>a well-connected and integrated internal road layouts which allows good accessibility for bus services</u> priority measures.
Part 7, Strategic Growth Site Policy 8 – North of Broomfield, Historic and Natural Environment, bullet 5 and paragraph 7.300	ECC recommend reference is made to ‘ <i>multifunctional</i> ’ green infrastructure to ensure consistency throughout the Plan.	<p>ECC recommend bullet 5 is amended to read:</p> <ul style="list-style-type: none"> • Create a network of <u>multifunctional</u> green infrastructure. <p>ECC recommend paragraph 7.300 is amended to read:</p> <p><i>This shall include a comprehensive and coherent network of <u>multifunctional</u> green infrastructure, formal and informal recreation and community spaces.</i></p>
Part 7, Strategic Growth Site Policy 8 – North of Broomfield, Site infrastructure requirements, bullet 6	ECC recommend separating out the need for financial contributions to the North East Bypass and education.	<p>ECC recommend bullet 6 is separated into the following:</p> <ul style="list-style-type: none"> • <u>Financial contributions to delivery of the Chelmsford North East Bypass</u>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Part 7, Strategic Growth Site Policy 8 – North of Broomfield, paragraph 7.292	Paragraph 7.292 ECC recommend reference to a `nursery school' is amended to read `nursery' to provide more certainty that a new 56 place early years and childcare nursery is to be provided rather than a `pre-school'	ECC recommend paragraph 7.292 is amended to read: <i>Given the scale of the development, a wide range of new community services and facilities including a new nursery school, open spaces, recreation facilities and neighbourhood centre (including a safeguarded area for a new healthcare facility) are required.</i>
Part 7, Growth Site Policy 9a – Waltham Road Employment Area, Site infrastructure requirements, bullet 3	For consistency with other parts of the plan reference should be made to `safe and convenient' in bullet 3	ECC recommend bullet 3 is amended to read: <ul style="list-style-type: none"> • Provide <u>safe and convenient</u> pedestrian and cycle links to Boreham village.
Part 7, Strategic Growth Site Policy 15 – Little Boyton Hall Farm Employment Area, Historic and Natural Environment, additional bullet	ECC recommend reference is made to `multifunctional' green infrastructure in an additional bullet to ensure consistency throughout the Plan.	ECC recommend an additional bullet to read: <ul style="list-style-type: none"> • <u>Create a network of multifunctional green infrastructure</u>
Part 7, Strategic Growth Site Policy 15 – Little Boyton Hall Farm Employment Area, Site infrastructure requirements, bullet 3.	For consistency with other parts of the plan reference should be made to `safe and convenient' in bullet 3	ECC recommend bullet 3 is amended to read: <ul style="list-style-type: none"> • Provide <u>safe and convenient</u> pedestrian and cycle links.
Part 7, Strategic Growth Site	ECC is supportive of Garden Communities and that they follow TCPA Garden City Principles as set out in paragraph 7.354.	ECC recommend that East Chelmsford is progressed having regard to the key principles set out in the Essex

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Policy 16a – East Chelmsford Garden Community (Hammonds Farm), paragraph 7.354 and 7.363	ECC welcome reference in paragraph 7.363 to the Essex School Organisation Service's 'Garden Communities and Planning School Places' to ensure schools are appropriately planned and laid out to serve the Garden Community.	Design Guide - Garden Communities . These principles have already been embraced by and are being applied to many of the emerging garden communities in Essex and include green infrastructure; integrated and sustainable transport; employment opportunities; living environment; smart and sustainable living; good design; community engagement; local stewardship; strong corporate, political and public leadership; and healthy new town principles.
Part 7, Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm), paragraph 7.343		ECC recommend paragraph 7.343 is amended to read: <i>They will also provide <u>new and enhanced</u> bus services, enhanced connection to Sandon Park and Ride to serve eastern road corridors into the City and improvements to the Army and Navy junction.</i>
Part 7, Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm), Site masterplanning principles, Movement and Access	Garden Communities offer an opportunity to best manage wide ranging transport impacts, encourage the use of active and sustainable travel (walking, wheeling, and cycling consistent the core design principles of LTN 1/20) and establish priority for public transport both within and around the Garden Community over private vehicles. The internalisation of trips helps reduce impacts of additional trips on the surrounding network. The key routes around the community and corridors connecting it to key local facilities should also reflect the same design standards and objectives of the community itself, focusing on prioritisation of active and public transport modes and emphasising the importance of networks in ensuring that people have realistic end to end journey options. ECC supports in principle the references in bullets 1 – 12 Movement and Access and paragraphs 7.364 to 7.368 requiring the site to provide substantive active and sustainable travel connections to the Chelmsford Urban Area and key destinations (including the town centre and Beaulieu Station). These will need to be refined collaboratively between ECC, CCC, National Highways and the developer, through masterplanning and subsequent planning applications. The developer will be expected to	ECC recommend bullet 2 is amended to read: <ul style="list-style-type: none"> <i>Additional access to the site will be from Junction 19 of the A12 (Boreham Interchange) and, to include a new multi-modal vehicular bridge over the River Chelmer/Chelmer with measures to prevent deter use as a through-route between junction 18 and junction 19 for all vehicular traffic excluding buses (i.e. bus gate)</i> ECC recommend bullet 4 is amended to read: <ul style="list-style-type: none"> <i>Provide an effective movement strategy <u>for all users within the site and beyond</u></i> ECC recommend Movement and Access, bullet 5 is amended to read:

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	<p>prepare a delivery strategy for these proposals demonstrating their suitability, deliverability and viability.</p> <p>Some additional comments are provided regarding specific bullet points in the Movement and Access section:</p> <ul style="list-style-type: none"> Bullet 2 suggests providing a multi modal vehicular link to the Boreham interchange across the River Chelmer/Blackwater Navigation with measures to deter through traffic – site masterplanning and the Transport Assessment will need to provide more clarity on its form, function and deliverability given the route will cross areas subject to flooding, and the navigable water way requires bridging orders which are only available to the highway authority. ECC notes that the developer is in control of the land which would secure access of the site to Boreham Interchange. ECC consider it imperative that measures are put in place to prevent a through-route between junction 18 and junction 19 for all vehicular traffic excluding buses (i.e. bus gate). Bullet 3 - Good accessibility for bus services, including bus stop infrastructure as appropriate, along with bus priority measures will need to be provided within and related to the site and the wider area including Chelmsford City Centre and other key destinations. Bullet 4 - ECC support the requirement to provide an effective movement strategy within the site, but this should reflect the needs of all users and cover the relevant area beyond the site. The developer must be able to demonstrate the delivery of the external linkages and infrastructure measures is within their control and this should be articulated in the movement strategy for all users within the site and beyond. ECC would expect the developer to undertake a detailed Transport Assessment to which ECC would seek discussion with regards its scope and outputs. ECC is soon to publish new guidance for the production of 'Transport Assessments for Garden Communities and Large-Scale Developments'. This guidance seeks to implement an evidence based collaborative approach to Transport Assessments to deliver a Net Zero ambition, including mode share estimations. These should be based on realistic inputs and reflect the phasing and build out of the development. Where there are likely to remain accessibility deficits (for example due to isolated location of the development and the high cost of mitigating these deficits) these will be a reason to test 	<ul style="list-style-type: none"> <i>....and existing and proposed employment locations, including <u>SGS 16b</u>.</i> <p>ECC recommend bullet 7 is amended to read:</p> <ul style="list-style-type: none"> <i>Provide safe multi-user access routes under and over the A12 <u>to connect in with existing routes</u></i> <p>ECC recommend bullet 12 is amended to read:</p> <ul style="list-style-type: none"> <i>Traffic calming measures <u>to deter traffic on local roads including on Church Road, and Hammonds Road, Plantation Road and Main Road in Boreham.</u></i> <p>Given the connectivity requirements across the A12 the site masterplanning will need to recognise this may lead to areas of low usage with limited observation and potential impacts on perceived safety, particularly during hours of darkness. As such, these buffer zones would need to be well-lit artificially and well-designed as sustainable travel routes, which do not impact negatively on the landscape and wildlife. Similarly, such large buffers increase the cost of operation of bus and BRT (Bus Rapid Transit) services as they are in effect “dead mileage” which does not generate revenue. This needs to be factored into the expectations around the viability and cost of bus services to and from the site.</p>

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	<p>more stringently high non car modal share assumptions. While ECC supports the 60% non-car mode share target for the garden community they will need very clear, robust evidence that helps to address the connectivity issues over and under the A12, informed by the substantive measures identified in the draft policy. The mode share and impacts of the development should be assessed on an ongoing basis and managed. As well as mode share targets, absolute targets and thresholds will be required. Unacceptable impacts should be clearly agreed in advance of the determination of any planning decision and these impacts should have clear mitigation schemes attached to them. ECC recommend that Trip Generation should be based on appropriate local comparators and justified in relation to wider accessibility measures. A spectrum of outcomes must be considered, and strategies developed to achieve the long-term vision from each. Whilst it may be acceptable to ultimately derive justified lower trip generation factors than “business as usual” there must always be a “business as usual” comparator provided and clear evidence provided as to why business as usual will not be the default, as well as clear linkages to the specific measures expected to result in lower than business as usual trip rates. Transport impacts must be pre-assessed at multiple time points through the development phases to ensure that at no time will they become unacceptable in relation to the agreed targets. Mechanisms, including the stopping of further occupations, will be required to manage this in practice through the development phase.</p> <ul style="list-style-type: none"> • Bullet 5 makes reference to additional and improved pedestrian, cycle and where appropriate bridleway connections within the site and to the wider area. Safe, convenient and direct connections will be required to Strategic Growth Site 16B adjacent to the site given its opportunity to provide jobs for the garden community residents. It is important that this site is able to attract residents from the Garden Community via active and sustainable modes rather than primarily acting as a draw for employment from other locations. Moving forward Site 16 a and b should maximise connectivity which will help the garden community meet its sustainability targets. Reference to this connectivity is identified in SGS Policy 16b, bullet 5 but not 16a. • Bullet 7 - Provide safe multi-user access routes under and over the A12 and these should be required to connect in with existing routes. 	

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	<ul style="list-style-type: none"> • Bullet 8 - New active and sustainable route and bridge over the A12 to connect to Sandon Park and Ride - ECC considers any route should connect 'close' to the park and ride and not route directly through it (see comment to Movement and access, bullet 8 below). • Bullet 9 - Site-wide travel plan(s) and a 60% modal share for active and sustainable transport - ECC is soon to publish updated Travel Plan guidance, which provides for long term monitoring of transport impacts. Given the timescales in the delivery of housing in Garden Communities a flexible approach to travel planning and on-site sustainable travel measures should be adopted. This should be underwritten by a vision-led ('decide and provide') approach to transport assessment of proposals followed by monitoring and management of their performance and impacts, overseen by an Essex County Garden Community-wide Transport Review Group. A Flexible Travel Fund should be agreed by the planning process to provide a long-term funding stream to allow for proactive management of transport impacts across the site. • Bullet 9 - Within a site of this scale, ECC expect to see a range of Mobility Hubs, as set out in new ECC guidance, which will be published soon. Located in key locations, they will have a range of facilities depending on the demand for their use. In the most populous areas of the Garden Community, we would expect to see a larger Mobility Hub, which offers many transport related services including interchange opportunities between multiple bus services, hire and information. At less busy locations, smaller hubs would be required. Shared transport options including a high ratio of car club vehicles to dwellings should be dispersed throughout the development including at Mobility Hubs. This should be secured through the planning process. • Bullet 10 - Bus Based Rapid Transit infrastructure with direct, frequent bus service operating throughout the day, at night and at weekends connecting with the City Centre and Chelmsford and Beaulieu Park Rail Stations via unimpeded route corridors where feasible will be crucial to the access strategy for the site. Integration of buses with relevant rail services in terms of frequencies and hours of operation is essential and secured through the planning process. The concept of a BRT (Bus Rapid Transit) service delivering a real step change in passenger transport provision for a Garden Community is one that is 	

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	<p>supportable; however, in practice this means an ambition much higher than “business as usual” services. High quality vehicles operating at very high frequency and benefiting from end-to-end journey priority would be key features of BRT (Bus Rapid Transit). Similarly, BRT must have priority access to and from the site and serve the key facilities on the site using a dedicated busway.</p> <ul style="list-style-type: none"> • Bullet 12 - Traffic calming measures will be required to deter traffic on local roads including Church Road, Hammonds Road, Plantation Road and Main Road in Boreham and any others identified in the Transport Assessment. <p>ECC (and its consultants Essex Highways) have undertaken the transportation modelling for the Local Plan Review and have completed assessment of the Spatial Approaches (Issues and Options); Preferred Options including junctions and the Sustainable Accessibility of locations. Key conclusions from modelling the Draft Plan along the A12 corridor regarding Hammonds Farm include:</p> <ul style="list-style-type: none"> • A12, Junction 18, Sandon Interchange along the A414 - modelling shows the roundabout exceeds capacity in the AM peak with the potential for long queues and journey time delays. Hammonds Farm (Strategic Growth Site 16A) is located in the vicinity of this junction and will be required to provide mitigation at this junction and substantive sustainable mitigation measures with initial proposals contained within section 7.3.2 of the Transport Impact Appraisal of Preferred Spatial Approach (March 2024) which will be further refined through the ongoing Local Plan, master planning and planning application process and further connectivity requirements are identified in Policy 16A (see below). ECC, CCC and National Highways will work with the developer to identify suitable access arrangements, which it will be required to fund and deliver. • A12 Junction 19, Boreham Interchange - is shown to operate within capacity in the baseline and with the addition of Local Plan development traffic. More detailed junction modelling, particularly on Generals Farm Roundabout, where access to the Hammonds Farm development is proposed, will be undertaken to inform the Pre-submission plan to provide a more robust appraisal of development impact and potential mitigation required. 	

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	<ul style="list-style-type: none"> A12 Junction 17, Howe Green Interchange – modelling identifies the impact as being relatively minor, caused by a wider redistribution of traffic flows away from the junction due to background congestion along the A12 corridor. Howe Green is a recognised existing congestion hotspot and is a long-term issue to be considered by ECC in partnership with National Highways as part of a more strategic solution to redesign the junction and the A12 carriageway at this location. 	
Part 7, Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm), Design and Layout	In order to deliver the necessary substantive active and sustainable transport measures identified in the 'Movement and Access' section, the site should be designed from first principles to encourage sustainable travel use with walking and wheeling at the top of the modal hierarchy unless otherwise clearly warranted.	<p>This is going to require several considerations to be secured via the planning process, which are outlined below for consideration:</p> <ul style="list-style-type: none"> <u>a defined single 'town centre'</u> - a new garden community based around different village typologies often limits the practical implementation of public transport and encourages linked journeys which are more likely to be by car due to the dispersal of facilities. Sustainable transport interventions often perform better where there is single attractor which can be serviced by a range of needs. Housing densities would be higher closer to the town centre to better support the provision of public and shared transport services. <u>Well Designed Streets</u> - the urban realm should be designed with active travel in mind. Paragraph 5.23 of the Draft Plan makes reference to Essex Design Guide and supplementary guidance (A New Development Model for Essex, October 2023) and is supported. Walkable neighbourhoods are designed to prioritise walking and cycling enabling access to facilities and services without needing to use the private car. The co-location and concentration of retail, community and associated uses to support linked trips should be promoted as they would result in creating multiple reasons to visit a destination, minimising the number and length of

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		<p>trips and increasing the awareness and convenience of opportunities to participate in leisure, sport and physical activity.</p> <ul style="list-style-type: none"> • The <u>status and location of vehicular movement</u> within the development - as well as car, cycle and bus trips originating from the site, incoming trips (for example, from deliveries and commuters) will also generate traffic on the site. It is essential to consider early on how the inevitable vehicle movements are managed with fore-thought to self-driving vehicles. There is clearly a synergy with Well Designed Streets which will, if applied, identify a continuum of street typologies based on whether they prioritise Place or Movement. This may influence such design considerations as speed, road widths and material palettes. • <u>Parking Strategy</u> - needs to be established which identifies both the amount and location of parking (including for loading /unloading), as well as specific design principles that will limit the negative impact of parked vehicles and support wider modal share objectives. Parking space and access to it for cycles and other micro-modes needs to be prioritised through the strategy. The emerging New Essex Parking Guidance for Garden Communities would be expected to be followed, which focuses on development achieving higher levels of sustainable mode share, healthy lifestyles, environment benefits. A design-led approach to determine the right type of parking in a range of contexts such as walkable neighbourhoods, including consideration of on / off street provision, parking courts and public realm, and responding to development scale, density and layout. • <u>Servicing strategy</u> - design approaches should promote the impact of servicing and waste

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		<p>collection on other road users. Consideration of where and how waste is collected is essential. Similarly, areas/ buildings with high servicing requirements should not prejudice the streets for active modes and public transport.</p>
<p>Part 7, Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm), Supporting on site development and Site infrastructure requirements, bullet 1, 2 and 3</p>	<p>ECC supports the reference in <i>‘Site infrastructure requirements’</i> regarding early years, primary and secondary provision. However, ECC recommend bullets 1, 2 and 3 are amended to reflect ECC preferred wording.</p> <p>ECC note that bullet 3 makes reference to the need for three stand-alone nurseries (<i>circa 0.26 hectares each</i>). The Developers’ Guide sets out the requirement for 0.13 ha for a new 56 place early years and childcare nursery. ECC has suggested some alternative wording consistent with the site area for three new nurseries.</p> <p>ECC recommend <i>‘Supporting on-site development’</i>, bullet 3 is amended as it is premature to assume the school will be an all-through school. However, the primary and secondary school should be co-located to provide the option of an all-through school but a statutory process is required to be followed to determine the type(s) of school(s) established. However, ECC seek to encourage such schools as they can assist in establishing a full range of education facilities earlier in the development’s construction than would otherwise be the case. This is because having a ‘feeder’ primary cohort reduces the risk of a low secondary intake. There are also economies of scale generated by pooling some resources.</p> <p>ECC recommend the reasoned justification is amended accordingly in paragraph 7.363.</p>	<p>ECC recommend <i>‘Supporting on-site development’</i>, bullet 3 is amended to read:</p> <ul style="list-style-type: none"> • <u><i>Provision of a co-located primary and secondary school with early years and childcare nursery (with potential for a sixth form)</i></u> <p>ECC recommend <i>‘Site infrastructure requirements’</i>, bullets 1, 2 and 3 are amended to read:</p> <ul style="list-style-type: none"> • <u><i>A new secondary school (Use Class F1(a)) on 10.1 hectares co-located with primary school (Use Class F1(a)) and early years and childcare nursery (Use Class E(f)) on 2.1 hectares of suitable land allocated for education and early years and childcare use.</i></u> • <u><i>Two new primary schools (Use Class F1(a)) with co-located early years and childcare nursery (Use Class E(f)) each on 2.1 hectares of suitable land allocated for education and childcare use.</i></u> • <u><i>Three new 56 place stand-alone early years and childcare nurseries (Use Class E(f)) each on 0.13 hectares of suitable land allocated for education and childcare use.</i></u> <p>ECC recommend paragraph 7.363 is amended to read:</p> <p><u><i>The co-located primary and secondary school should be provided on a site of around 12 hectares of land. The developer will be expected to provide the education land and a financial contribution.</i></u></p>

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		<i><u>Opportunities for dual use sports facilities within the new secondary school will be considered through the masterplan and planning application process. Consideration should be given to Essex School Organisation Service's 'Garden Communities and Planning School Places' to ensure schools are appropriately planned and laid out to serve the Garden Community.</u></i>
Part 7, Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm), Site infrastructure requirements, bullet 6	ECC recommend an amendment to bullet 6 to improve connectivity for bus services.	ECC recommend bullet 6 is amended to read: Appropriate measures to promote and enhance sustainable modes of transport including Bus Based Rapid Transit infrastructure, safe multi-user access routes under and over the A12 <u>to connect to existing routes</u> , and a new active and sustainable route and bridge over the A12 to connect to Sandon Park and Ride.
Part 7, Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm), Movement and Access, bullet 2	ECC recommend an amendment due to a typographical error.	ECC recommend bullet 2 is amended to read: <i><u>Additional access to the site will be from Junction 19 of the A12 (Boreham Interchange), to include a new multi-modal vehicular bridge over the River Chelmer/Chelmer</u></i> with measures to deter use as a through-route.
Part 7, Strategic Growth Site Policy 16a – East Chelmsford Garden	ECC support the requirement to provide an effective movement strategy within the site, but this should reflect the needs of all users and cover the relevant area beyond the site. The developer must be able to demonstrate the delivery of the external linkages and infrastructure measures is within their control and this should be articulated in the movement strategy for all users within the site and beyond.	ECC recommend bullet 4 is amended to read: <ul style="list-style-type: none"> <i><u>Provide an effective movement strategy for all users within the site and beyond</u></i> ECC recommend bullet 7 is amended to read:

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Community (Hammonds Farm), Movement and Access, bullet 4 and 7		<ul style="list-style-type: none"> • <i>Provide safe multi-user crossings of the A414 <u>and</u> A12 junction 18.</i>
Part 7, Policy SGS 16a – East Chelmsford Garden Community (Hammonds Farm), page 229, Site masterplanning principles: Movement and Access, bullet 8	<p>Please refer to comments regarding Policy S9 – Infrastructure Requirements, Transport and Highways, Bullet 12.</p> <p>ECC is mindful that the Sandon Park and Ride (SPAR) must fulfil its function to capture Chelmsford bound motorists travelling into the city from wider distances and therefore any proposal must not reduce the quantum of spaces at the SPAR, which are planned to be extended as part of the Army and Navy Sustainable Transport in 2026. ECC would be concerned that any bus service routing directly through the site would significantly impact upon its service/operation.</p> <p>Consequently, a range of potential options are being investigated to provide connectivity via a new bridge (walking, cycling and bus) between the Hammonds Farm site and the A414 close to Sandon Park and Ride. option will consider the potential to link in with emerging proposals regarding the strategic sites in East Chelmsford and improvements identified in the Army and Navy Sustainable Transport Package in order to provide onward connectivity benefits and to help reduce the impact of car trips on the surrounding road network – particularly the modelled pinch-point on the A414 on the approach to the A12 Junction 18.</p>	<p>ECC recommend bullet 8 is amended to read:</p> <ul style="list-style-type: none"> • <i>Provide a new active and sustainable route and bridge over the A12 to connect <u>close</u> to Sandon Park and Ride</i> <p>Amend paragraph 7.364, bullet 3 accordingly to read:</p> <ul style="list-style-type: none"> • <i>A new active and sustainable route and bridge over the A12 to connect <u>close</u> to Sandon Park and Ride.</i>
Part 7, Policy SGS 16a – East Chelmsford Garden Community (Hammonds Farm), paragraph 7.364, bullet 2	ECC recommend paragraph 7.364, bullet 2 is amended to help improve wider connectivity.	<p>ECC recommend paragraph 7.364, bullet 2 is amended to read:</p> <ul style="list-style-type: none"> • <i>Safe multi-user access routes under and over the A12 <u>to connect in with existing routes</u></i>
Part 7, Strategic Growth Site	ECC recommend reference is made to `multifunctional` green infrastructure to ensure consistency throughout the Plan.	ECC recommend bullet 1 is amended to read:

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Policy 16a – East Chelmsford Garden Community (Hammonds Farm), Historic and Natural Environment, bullet 1 and paragraph 7.374.		<ul style="list-style-type: none"> • <i>Provide a network of <u>multifunctional</u> green and blue infrastructure and reinstate historic landscape features to mitigate the visual, biodiversity and heritage impacts of the development.</i> <p>ECC recommend paragraph 7.374 is amended to read:</p> <p><i>This shall include a comprehensive and coherent network of <u>multifunctional</u> green infrastructure, formal and informal recreation and community spaces.</i></p>
Part 7, Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm), Stewardship, additional bullet.	<p>ECC welcomes the early recognition of stewardship as a key factor in the success of the planning and delivery of the site. ECC would emphasise that considerations around Stewardship should be integral to the approach taken by the development planning strategy from first principles. A long-term strategy on how services, infrastructure and features which are used to mitigate impacts, can be maintained and sustained is essential. For example, a Parking Strategy must be shown to be enforceable. Facilities such as mobility hubs will require both revenue and capital to ensure their long-term sustainability. Cycle paths and footways should be kept clear of overgrowing vegetation etc.</p> <p>ECC recommend reference is made to include a requirement for stewardship activities to be in place for the first housing occupations to ensure timely delivery of community development activities. Otherwise, there is a risk that investment is not provided until a critical threshold of service charge receipts is reached - in other words stewardship activities will need some form of forward funding to be operational at the point when it is most needed. Community development activities could involve areas such as encouraging public transport and active travel so it helps deliver other policy areas too. Consideration will be needed regarding management and maintenance of any green infrastructure, as well as any biodiversity habitat enhancements as part of the Biodiversity Gain Plan.</p>	<p>ECC recommend an additional bullet be added requiring stewardship activities to be in place for the first housing occupations to ensure timely delivery of community development activities.</p> <ul style="list-style-type: none"> • <u><i>stewardship activities are required to be in place in advance of the first housing occupations to ensure timely delivery of community development activities.</i></u>
Part 7, Strategic Growth Site Policy 16a –	ECC recommend reference is made to include a requirement for an Asset Schedule to be prepared by applicants with the express agreement of CCC and ECC. The Asset Schedule should list all the public assets within the	ECC recommend reference is made to include a requirement for an Asset Schedule to be prepared by

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
East Chelmsford Garden Community (Hammonds Farm), Stewardship, additional bullet	<p>Garden Community and set out who will own them and who will be responsible for their management and maintenance. The Asset Schedule should form part of the Stewardship Strategy and is needed so as to be clear on the roles and responsibilities of all parties in ensuring good quality place-keeping.</p> <p>A clearly defined approach to adoption (i.e. those streets and places which are owned and maintained by the Local Authority) will need to be defined by the planning process and the relevant standards applied at that point. All proposals and interventions should be assessed against long-term resilience criteria – maintainability, ownership, cost, longevity. A clear structure for managing ongoing Stewardship should be agreed at the point of planning permission and should include a Transport Review Group.</p>	<p>applicants with the express agreement of relevant partners (for example CCC and ECC).</p> <ul style="list-style-type: none"> • <u>an Asset Schedule is required, as part of the Stewardship Strategy, listing the public assets outlining their management and maintenance, to be agreed with relevant partners.</u>
Part 7, Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm), Stewardship, paragraph 7.356.	ECC recommend `resident engagement' is amended to 'community engagement' to imply broader engagement with local businesses, organisations, community groups, etc as well as residents.	<p>ECC recommend paragraph 7.356 is amended to read:</p> <p><i>The expectation is that the newly formed Chelmsford Garden Community would have a defined remit in stewardship across the whole Garden Community area to foster collaboration, create accountability, provide consistency and ensure <u>community</u> resident engagement.</i></p>
Part 7, Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm), paragraph 7.361	The justification lacks references to sectoral strategy and market influence. It is recommended that a mix of uses to be provided that aligns with a clear sectoral strategy for the Garden Community, meeting occupier needs with a range of units size for primary employment uses and supply chain.	<p>ECC recommend these comments are considered in preparing an Economic Strategy for the site.</p> <p>ECC recommend that monoculture of business uses should be avoided and mixed employment uses, mix of unit types and sizes should be encouraged together with supporting amenities to attract investors, employers and staff.</p> <p>The ambition should be to prevent single market driven uses like logistics and low-density industrial displacing</p>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
		land for flexible and specialist accommodation for growth sectors, start-ups and small businesses.
Part 7, Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm), paragraph 7.365	For consistency with other parts of the plan reference should be made to ' <i>safe and convenient</i> ' in paragraph 7.365.	ECC recommend paragraph 7.365 is amended to read: <i>'The development will be expected to provide additional and improved <u>safe and convenient</u> pedestrian, cycle and where appropriate bridleway connections within the site and to the wider area including.... .'</i>
Part 7, Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm), paragraph 7.367	For consistency with other parts of the plan reference should be made to ' <i>safe and convenient</i> ' in paragraph 7.367.	ECC recommend paragraph 7.367 is amended to read: <i>The development will be required to maximise opportunities for <u>active and sustainable</u> transport modes to be taken up to create neighbourhoods where alternative forms of transport to the private car (walking, cycling and public transport) are prioritised.</i>
Part 7, Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm), Site infrastructure requirements, bullet 6 and paragraph 7.364, bullet 3	<p>ECC recommend site infrastructure requirements bullet 6 is amended to ensure consistency with proposed change to Policy S9.</p> <p>ECC is mindful that the SPAR must fulfil its function to capture Chelmsford bound motorists travelling into the city from wider distances and therefore any proposal must not reduce the quantum of spaces at the P and R, which are planned to be extended as part of the Army and Navy Sustainable Transport in 2026. ECC would be concerned that any bus service routing directly through the site would significantly impact upon its service/operation.</p> <p>Consequently, a range of potential options are being investigated to provide connectivity via a new bridge (walking, cycling and bus) between the Hammonds Farm site and the A414 close to Sandon Park and Ride. Any option will consider the potential to link in with emerging proposals</p>	<p>ECC recommend bullet 12 is amended to read:</p> <ul style="list-style-type: none"> <i>• Appropriate measures to promote and enhance sustainable modes of transport including Bus Based Rapid Transit infrastructure, safe multi-user access routes under and over the A12, and a new active and sustainable route and bridge over the A12 to connect <u>close</u> to Sandon Park and Ride</i> <p>ECC recommend paragraph 7.364, bullet 3 is amended to read:</p> <p><i>A new active and sustainable route and bridge over the A12 to connect <u>close</u> to Sandon Park and Ride.</i></p>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
	regarding the strategic sites in East Chelmsford and improvements identified in the Army and Navy Sustainable Transport Package in order to provide onward connectivity benefits and to help reduce the impact of car trips on the surrounding road network – particularly the modelled pinch-point on the A414 on the approach to the A12 Junction 18.	
Policy 16a – East Chelmsford Garden Community (Hammonds Farm), Historic and Natural Environment, bullet 12 and paragraph 7.381	<p>ECC welcomes the requirement for the developer to undertake a Minerals Resource Assessment in bullet 12 and paragraph 7.381.</p> <p>The site promoters have undertaken a desk-based Mineral Assessment Report (2023) in response to the requirements of Policy S8 of the Essex Minerals Local Plan 2014 regarding proposed development within Mineral Safeguarding Areas (MSAs). An initial desk-based assessment was considered a useful means of refining the requirements for any further study that may be needed.</p>	<p>ECC, as MWPA, reviewed the study findings and conclusions and acknowledged in December 2023 that working of the full mineral deposit would not be compatible with the proposed non-mineral development.</p> <p>ECC noted that subject to further borehole investigations, the height of the water table is such that there would be no opportunities for prior mineral extraction in any of the areas where development is proposed. It was noted that there is an opportunity for <i>“the ‘incidental extraction’ of the full thickness of mineral, in connection with the proposed development”</i> which applies to <i>“to those parts of the site where no built development or infrastructure is planned, and would be subject to the avoidance of other, existing constraints.”</i>. Therefore, further ground investigations are required, and as noted in the MRA, investigation “should be limited to those areas where incidental extraction would be feasible”. While it is acknowledged that working of the full mineral deposit would not be compatible with the proposed non-mineral development, the MRA would indicate that there is a workable mineral resource that would be sterilised by the non-mineral development and thus the supporting statement to the application needs to demonstrate that the need for the built development is such that it outweighs the sterilisation of the mineral resource. The Local Planning Authority will need to consider this balance in taking a decision on any planning application.</p>
Part 7, Strategic Growth Site Policy 16a – East Chelmsford	The site is to provide for around 43,000sqm of dedicated employment land.	The Economic Strategy produced by Lichfields for the North East Chelmsford Garden Community highlights the importance of an early critical mass in increasing deliverability of later phases. Should there be a policy or

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Garden Community (Hammonds Farm), Amount and type of development, bullet 2		reasoned justification reference to the need for a critical mass of serviced land and employment floorspace to be delivered as early as possible, to prove demand and values and thereby de-risk the deliverability of later phases.
Part 7, Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm), paragraph 8 and supporting text paragraphs 7.379 and 7.380.	Given the climate emergency declared by the City Council and the global climate crisis, ECC recommend the policy is more positive requiring the development to provide renewable, low carbon and decentralised energy schemes on site. This is consistent with the principles set out in the approved Development Framework Document, which is underpinning the subsequent detailed planning applications.	<p>ECC recommend paragraph 8 is amended to read:</p> <p><i>'The Council will <u>require</u> encourage the appropriate development of renewable, low carbon and decentralised energy schemes on the site.....'.</i></p> <p>ECC recommend paragraph 7.379 is amended to read:</p> <p><i>'Given the scale and nature of the development, the Council will <u>require</u> encourage the appropriate development of renewable, low carbon and decentralised energy schemes on the site....'.</i></p> <p>ECC recommend paragraph 7.380 is amended to read:</p> <p><i>'As this is a major new development site, where appropriate the Council will <u>require</u> encourage a move away from traditional wheeled bins to mass waste collection systems, such as an underground waste system.</i></p>
Part7, Strategic Growth Site 16B – Land Adjacent to A12 Junction 18 Employment Area, Historic and natural environment, bullet 10	<p>ECC recommend reference to the need for a Mineral Resource Assessment in the 'Historic and natural environment' section and paragraph 7.401 is deleted.</p> <p>Policy S8- Safeguarding mineral resources and mineral reserves of the adopted Minerals Plan states that the Mineral Planning Authority shall be consulted on all planning applications for development on a site located within an Mineral Safeguarding Area that is 5ha or more for sand and gravel. Whilst the site is partly located within an MSA its size is below the 5ha threshold requiring a Mineral Resource Assessment.</p>	<p>ECC recommend bullet 10 in the Historic and environment section is deleted</p> <p>• Minerals Resource Assessment</p> <p>ECC recommend paragraph 7.401 is deleted.</p> <p>7.401 The site lies within a Minerals Safeguarding Area. The developer will be required to undertake a Minerals Resource Assessment to assess if the site contains a</p>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
		viable minerals resource that would require extraction prior to development.
Part7, Strategic Growth Site 16B – Land Adjacent to A12 Junction 18 Employment Area, Site infrastructure requirements, bullet 1	For consistency with other parts of the plan reference should be made to ' <i>safe and convenient</i> ' in bullet 1.	ECC recommend bullet 1 is amended to read: <ul style="list-style-type: none"> • Provide <i>safe and convenient</i> pedestrian and cycle links to Sandon Park and Ride and to the east of the site, and routes associated with the East of Chelmsford allocations including East Chelmsford Garden Community (Hammonds Farm).
Part7, Strategic Growth Site 16B – Land Adjacent to A12 Junction 18 Employment Area, paragraph 7.389	A new 56 place nursery is being provided at Strategic Growth Site Policy 3b – East of Chelmsford – Land North of Maldon Road (Employment) and a further six at the nearby Strategic Growth Site Policy 16a – East Chelmsford Garden Community (Hammonds Farm). There is no policy requirement on this site.	ECC recommend paragraph 7.389 is amended to read: <p>'....., such as co-working space/café, early years and childcare nursery, small retail use and roadside facilities within a landscaped and attractive setting'.</p>
Part 7, Strategic Growth Site Policy 2 – West Chelmsford, Supporting on-site development, bullet 3, Site infrastructure requirements, bullet 2 and paragraph 7.116	<p>The site has an approved masterplan (Ref: 18/00001/MAS) for 800 new homes and outline planning permission submitted for up to 880 new homes (Ref:21/01545/OUT).</p> <p>In responding to 21/01545/OUT, ECC considered there was insufficient provision within the ward to meet the demand created from this development. ECC requested a financial contribution and land to facilitate a new provision of a 56 stand-alone facility, ideally co-located with any primary school provision and a financial contribution for the remaining places required to enable further places to be created.</p>	<p>ECC recommend 'Supporting on-site development', bullet 3 and 'Site infrastructure requirements', bullet 2 are deleted</p> <p><i>Supporting on site development</i></p> <ul style="list-style-type: none"> • Provision of new stand-alone early years and childcare nursery <p><i>Site infrastructure requirements:</i></p> <ul style="list-style-type: none"> • Land (circa 0.13 hectares) for a stand-alone early years and childcare nursery (Use Class E(f)) or contributions towards the cost of physical scheme provision with delivery through the Local Education Authority <p>ECC recommend paragraph 7.116 is amended to read:</p>

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		<p><i>The scale of development in this location will require a primary school with co-located 56 place early years and childcare nursery, as well as a further stand-alone 56 place nursery school.</i></p>
Part 7, Strategic Growth Site Policy 2 – West Chelmsford, Site infrastructure requirements, bullet 1 and paragraph 7.116.	<p>ECC supports the reference in ‘Supporting on-site development’ regarding ‘<i>Provision of a new primary school with co-located early years and childcare nursery.</i>’ but recommend ‘Site infrastructure requirements’, bullet 1 is amended to reflect ECC preferred wording.</p> <p>ECC notes that bullet 8 only makes reference to the requirement for a contribution towards secondary education, and not primary or early years and childcare. Paragraph 7.116 does reference the need for the developer to be expected to provide the land and costs towards the schemes. As worded it could be wrongly interpreted as a requirement on the developer to provide the land for the co-located primary school and early years and childcare nursery with no financial contribution. A primary school contribution is essential for ECC to deliver the primary school, as well as the provision of land.</p> <p>In para 7.116, reference should also be made to the education land meeting the criteria set out in ECC’s Developers’ Guide to Infrastructure Contributions (Section 5.2 Schools, page 41) with regards the safe traffic free environment around schools</p> <p>Please refer to overarching comment regarding all sites and the need for either primary, secondary and early years and childcare contributions and the need for a traffic free environment at the front of schools.</p>	<p>ECC recommend ‘Site Infrastructure Requirements, bullet 1 is replaced with:</p> <ul style="list-style-type: none"> <i><u>A new primary school (Use Class F1(a)) with co-located early years and childcare nursery (Use Class E(f) on 2.1 hectares of suitable land allocated for education and childcare use</u></i> <p>Add the following sentence to paragraph 7.116 to read:</p> <p><i><u>A safe traffic free environment around school entrances should be provided, whilst ensuring access for emergency vehicles and exceptional use such as facilitating disabled access.</u></i></p>
Part 7, Strategic Growth Site Policy 2 – West Chelmsford, Movement and Access, bullet 2	<p>For consistency with other parts of the plan reference should be made to ‘<i>safe and convenient</i>’ in bullet 2.</p> <p>ECC recommend additional bullets given the need for this site to maximise sustainable links for pedestrians, cyclists and bus passengers, particularly</p>	<p>ECC recommend bullet 2 is amended to read:</p> <ul style="list-style-type: none"> <i><u>Provide safe and convenient pedestrian and cycle connections</u></i> <p>ECC recommend additional bullets to read:</p>

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and additional bullets	following the removal of a bus link via Avon Road, as included in the adopted Local Plan.	<ul style="list-style-type: none"> • <u>New dedicated pedestrian and cycle links to the existing urban area</u> • <u>Provide well-connected and integrated internal road layouts which allow good accessibility for bus services.</u>
Part 7, Strategic Growth Site Policy 2 – West Chelmsford, Historic and Natural Environment, bullet 2 and paragraph 7.122.	ECC recommend reference is made to ' <i>multifunctional</i> ' green infrastructure to ensure consistency throughout the Plan.	<p>ECC recommend bullet 2 is amended to read:</p> <ul style="list-style-type: none"> • Create a network of <u>multifunctional</u> green infrastructure. <p>and paragraph 7.122</p> <p><i>This shall include a comprehensive and coherent network of <u>multifunctional</u> green infrastructure, formal and informal recreation and community spaces.</i></p>
Part 7, Strategic Growth Site Policy 2 – West Chelmsford, Site infrastructure requirements, bullet 4 and paragraph 7.118	For consistency with other parts of the plan reference should be made to ' <i>active and sustainable travel</i> ' in bullet 4 and paragraph 7.118.	<p>ECC recommend bullet 4 is amended to read:</p> <ul style="list-style-type: none"> • <i>Appropriate measures to promote and enhance <u>active and sustainable</u> modes of transport</i> <p>and paragraph 7.118</p> <p><i>Opportunities for <u>active and sustainable</u> transport modes should be maximised to create neighbourhoods where alternative forms of transport to the private car (walking, cycling and public transport) are prioritised.</i></p>
Part 7, Strategic Growth Site Policy 3a – East of Chelmsford – Manor Farm, paragraph 1	For consistency with other parts of the plan reference should be made to ' <i>active and sustainable travel</i> ' in paragraph 1.	<p>ECC recommend paragraph 1 is amended to read:</p> <p><i>'.....new sustainable neighbourhood that maximises opportunities for <u>active and sustainable</u> travel as well as a new Country Park.'</i></p>
Part 7, Strategic Growth Site Policy 3a – East of Chelmsford –	For consistency with other parts of the plan reference should be made to ' <i>safe and convenient</i> ' pedestrian and cycle connections/links.	ECC recommend Movement and Access bullet 2 is amended to read:

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Manor Farm, Movement and Access, bullet 2 and Site infrastructure requirements, bullet 7.		<ul style="list-style-type: none"> • Provide <u>safe and convenient</u> pedestrian and cycle connections <p>ECC recommend Site infrastructure requirements bullet 7 is amended to read:</p> <p><i>Provision of a new northwest <u>safe and convenient</u> pedestrian/cycle link through the Country Park to provide a connection to future off-site cycle links.</i></p>
Part 7, Strategic Growth Site Policy 3a – East of Chelmsford – Manor Farm,, Historic and Natural Environment, bullet 4	ECC recommend reference is made to ' <i>multifunctional</i> ' green infrastructure to ensure consistency throughout the Plan.	<p>ECC recommend bullet 4 is amended to read:</p> <ul style="list-style-type: none"> • Create a network of <u>multifunctional</u> green infrastructure.
Part 7, Strategic Growth Site Policy 3b – East of Chelmsford - Land North of Maldon Road (Employment), Site infrastructure requirements, bullet 1	ECC supports the reference to providing a new 56 place stand-alone nursery subject to the suggested policy wording amendments to reflect ECC preferred wording.	<p>ECC recommend 'Site Infrastructure Requirements, bullet 1 is replaced with:</p> <ul style="list-style-type: none"> • <u>New 56 place stand-alone early years and childcare nursery (Use Class E(f)) on 0.13 hectares of suitable land allocated for education and childcare use.</u>
Part 7, Strategic Growth Site Policy 3b – East of Chelmsford - Land North of Maldon Road (Employment),	For consistency with other parts of the plan reference should be made to ' <i>safe and convenient</i> ' pedestrian and cycle connections/links. This is considered important given the proximity of the A414 route.	<p>ECC recommend Movement and Access bullet 3 is amended to read:</p> <ul style="list-style-type: none"> • Provide <u>safe and convenient</u> pedestrian and cycle connections including access to the Sandon Park and Ride.

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Movement and Access, bullet 3 and paragraph 7.151.		ECC recommend paragraph 7.151 is amended to read: <i>A <u>safe and convenient</u> cycle/footway should connect the site to Sandon Park and Ride to the east to maximise use of the existing Park and Ride site.</i>
Part 7, Strategic Growth Site Policy 3b – East of Chelmsford - Land North of Maldon Road (Employment), Historic and Natural Environment, bullet 3	ECC recommend reference is made to ' <i>multifunctional</i> ' green infrastructure to ensure consistency throughout the Plan.	ECC recommend bullet 3 is amended to read: <ul style="list-style-type: none"> • Create a network of <u>multifunctional</u> green infrastructure.
Part 7, Strategic Growth Site Policy 3c – East of Chelmsford - Land South of Maldon Road, Movement and Access, bullet 3.	For consistency with other parts of the plan reference should be made to ' <i>safe and convenient</i> ' pedestrian and cycle connections/links. This is considered important given the proximity of the A414 route.	ECC recommend Movement and Access bullet 3 is amended to read: <ul style="list-style-type: none"> • Provide <u>safe and convenient</u> pedestrian and cycle connections including access to the Sandon Park and Ride.
Part 7, Strategic Growth Site Policy 3b – East of Chelmsford - Land North of Maldon Road (Employment), Historic and Natural Environment, bullet 3	ECC recommend reference is made to ' <i>multifunctional</i> ' green infrastructure to ensure consistency throughout the Plan.	ECC recommend bullet 3 is amended to read: <ul style="list-style-type: none"> • Create a network of <u>multifunctional</u> green infrastructure

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Part 7, Growth Site Policy 3d – East of Chelmsford Land – North of Maldon Road, Movement and Access bullet 3 and paragraph 7.176	For consistency with other parts of the plan reference should be made to <i>'safe and convenient'</i> pedestrian and cycle connections/links. This is considered important given the proximity of the A414 route.	ECC recommend Movement and Access bullet 3 is amended to read: <ul style="list-style-type: none"> • Provide <u>safe and convenient</u> pedestrian and cycle connections including access to the Sandon Park and Ride. ECC recommend paragraph 7.176 is amended to read: <p><i>A <u>safe and convenient</u> cycle/footway should connect the site to Sandon Park and Ride to the east to maximise use of the existing Park and Ride site.</i></p>
Part 7, Growth Site Policy 3d – East of Chelmsford Land – North of Maldon Road, Historic and Natural Environment, bullet 3	ECC recommend reference is made to <i>'multifunctional'</i> green infrastructure to ensure consistency throughout the Plan.	ECC recommend bullet 3 is amended to read: <ul style="list-style-type: none"> • Create a network of <u>multifunctional</u> green infrastructure
Part 7, Growth Site Policy 4 – Land North of Galleywood Reservoir, Site development principles,	All developments should contribute to the green infrastructure network.	ECC recommend an additional bullet is added to read: <ul style="list-style-type: none"> • <u>Provide multifunctional green infrastructure, that contributes to the wider green infrastructure and nature recovery networks.</u>
Part 7, Growth Site Policy 4 – Land North of Galleywood Reservoir, Site development principles, bullet	For consistency with other parts of the plan reference should be made to <i>'safe and convenient'</i> pedestrian and cycle connections.	ECC recommend Site development principles, bullet 2 is amended to read: <ul style="list-style-type: none"> • Provide <u>safe and convenient</u> pedestrian and cycle connections. ECC recommend paragraph 7.190 is amended to read:

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
2 and paragraph 7.190		<i>Additional <u>safe and convenient</u> pedestrian and cycle connections should also be provided between the site and the wider area.</i>
Part 7, Growth Site Policy 5 – Land Surrounding Telephone Exchange, Ongar Road, Writtle, Site development principles, bullet 1.	For consistency with other parts of the plan reference should be made to <i>‘safe and convenient’</i> pedestrian and cycle connections	<p>ECC recommend Site development principles, new bullet 2 read:</p> <ul style="list-style-type: none"> • <i>Provide <u>safe and convenient</u> pedestrian and cycle connections.</i> <p>For consistency throughout the plan bullet 1 should be separated into two separate bullets, namely:</p> <ul style="list-style-type: none"> • <i>Vehicular access to the site will be from Ongar Road and/or The Green</i> • <i>Provide pedestrian and cycle connections</i>
Part 7, Growth Site Policy 5 – Land Surrounding Telephone Exchange, Ongar Road, Writtle, Site development principles, bullet 1.	All developments should contribute to the green infrastructure network.	<p>ECC recommend an additional bullet is added to read:</p> <ul style="list-style-type: none"> • <i><u>Provide multifunctional green infrastructure, that contributes to the wider green infrastructure and nature recovery networks.</u></i>
Growth Area 3 - South and East Chelmsford, paragraph 7.341	ECC recommend reference is made to <i>‘multifunctional’</i> green infrastructure to ensure consistency throughout the Plan.	<p>ECC recommend paragraph 7.341 is amended to read:</p> <p><i>This will be a comprehensively planned, landscape-led development centred around distinctive neighbourhoods supported by transport, new schools and early years and childcare provision, health care, utility services and <u>multifunctional</u> green infrastructure together with retail, community, employment and leisure uses.</i></p>
Growth Area 3 - South and East	As worded the paragraph implies the improvements to the A132/B1012 to the Rettendon Turnpike Junction will be provided by development at	ECC recommend paragraph 7.345 is amended to read:

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Chelmsford, paragraph 7.345	Danbury, Bicknacre and South Woodham Ferrers. It is only the latter that will fund and deliver these improvements as part of their planning application. Development at Danbury and Bicknacre will only provide site access and local walking and cycling improvements as appropriate.	<i>Development at South Woodham Ferrers They will also offer wider benefits to the community by helping to deliver road improvements including to the A132/B1012 to the Rettendon Turnpike Junction.</i>
Part 7, Strategic Growth Site Policy 10 – North of South Woodham Ferrers, Paragraph 1	For consistency with other parts of the plan reference should be made to <i>‘active and sustainable travel’</i> .	ECC recommend paragraph 1 is amended to read: <i>‘.... maximises opportunities for <u>active and sustainable travel</u>, in a landscaped setting.’</i>
Part 7, Strategic Growth Site Policy 10 – North of South Woodham Ferrers, Movement and Access, bullet 7	For consistency with other parts of the plan reference should be made to <i>‘active and sustainable travel’</i> in bullet 7.	ECC recommend bullet 7 is amended to read: <ul style="list-style-type: none"> <i>Provide additional and/or improved <u>safe and convenient</u> pedestrian and cycle connections to the Town Centre and railway station.</i>
Part 7, Strategic Growth Site Policy 10 – North of South Woodham Ferrers, Historic and Natural Environment, bullet 2	ECC recommend reference is made to <i>‘multifunctional’</i> green infrastructure to ensure consistency throughout the Plan.	ECC recommend bullet 2 is amended to read: <ul style="list-style-type: none"> <i>..... to provide a network of <u>multifunctional</u> green infrastructure to mitigate the visual, biodiversity and heritage impacts of the development’</i>
Part 7, Strategic Growth Site Policy 10 – North of South Woodham Ferrers, Site infrastructure	ECC supports the reference in Supporting on-site development but recommend the suggested policy wording amendments to reflect ECC preferred wording regarding bullet 1. For consistency, ECC recommend reference is made to the provision of proportionate financial contributions towards the co-located primary and early years nursery. The allocation is comprised of two granted planning permissions (subject to completion of a S106 agreement), whereby the	ECC recommend bullet 1 is amended to read: <i>Potential co-location of a new primary school (Use Class F1(a)) with an early years and childcare nursery (Use Class E(f)) on 2.1 ha of suitable land, and one stand-alone early years and childcare nursery (Use Class E(f)) on 0.13 hectares of suitable land; or two new stand-alone early years and childcare nurseries</i>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
requirements, bullet 1	Countryside site is to provide the land and a proportionate financial contribution is to be provided by Countryside (around 1,020 homes) and Bellway Homes (around 200 homes). This approach is consistent with the CIL Regulation 122 requirements.	<u>(Use Class E(f)) each on 0.13 hectares of suitable land allocated for education and childcare use. The developer(s) will be expected to provide the land and a proportionate financial contribution to the physical scheme.</u>
Part 7, Growth Site Policy 11a – South of Bicknacre, Movement and Access, bullet 2 and paragraph 7.431	For consistency with other parts of the plan reference should be made to <i>‘safe and convenient’</i> pedestrian and cycle connections.	ECC recommend bullet 2 is amended to read: <ul style="list-style-type: none"> • Provide <u>safe and convenient</u> pedestrian <u>and cycling</u> connections. ECC recommend paragraph 7.431 is amended to read: <ul style="list-style-type: none"> • <u>Safe and convenient</u> Pedestrian <u>and cycling</u> connections should be provided within the site with links into the wider network.
Part 7, Growth Site Policy 11a – South of Bicknacre, Historic and natural environment, additional bullet	ECC recommend reference is made to <i>‘multifunctional’</i> green infrastructure to ensure consistency throughout the Plan.	ECC recommend an additional bullet to read: <ul style="list-style-type: none"> • Provide a network of <u>multifunctional</u> green and blue infrastructure and reinstate historic landscape features to mitigate the visual, biodiversity and heritage impacts of the development.
Part 7, Growth Site Policy 12 - St Giles, Moor Hall Lane, Bicknacre, Site development principles, additional bullet	For consistency with other parts of the plan an additional bullet should be added to refer to the need for safe and convenient pedestrian and cycle connections.	ECC recommend an additional bullet is added to read: <ul style="list-style-type: none"> • Provide <u>safe and convenient</u> pedestrian <u>and cycling</u> connections.
Part 7, Growth Site Policy 12 - St Giles, Moor Hall Lane, Bicknacre, Site	ECC recommend reference is made to <i>‘multifunctional’</i> green infrastructure to ensure consistency throughout the Plan.	ECC recommend bullet 4 is amended to read: <ul style="list-style-type: none"> • Create a network of <u>multifunctional</u> green infrastructure.

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
development principles, bullet 4		
Part 7, Strategic Growth Site Policy 13 – Danbury, Site masterplanning principles, additional bullet	For consistency with other parts of the plan an additional bullet should be added to refer to the need for safe and convenient pedestrian and cycle connections.	ECC recommend an additional bullet is added to read: <ul style="list-style-type: none"> • Provide <u>safe and convenient</u> pedestrian <u>and cycling</u> connections.
Part 7, Strategic Growth Site Policy 13 – Danbury, paragraph 7.450	Paragraph 7.450 should be updated to reflect the current position at Eves Corner.	ECC recommend paragraph 7.450 is amended to read: <p><i>The A414 is a busy road connecting Chelmsford with Maldon which bisects the village. There is significant growth planned for Maldon which will add additional traffic to the A414. The Council has engaged with Maldon District Council on this issue through the 'Duty to Cooperate'. Pre-signals have been installed at the A414/Little Baddow Road/Mayes Lane (Eves Corner) junction to assist in the peak time operation of this junction through South East Local Enterprise Partnership (SELEP)/Essex County Council funding.</i></p>
Part 7, Policy SPA2 – Chelmsford City Racecourse Special Policy Area	For consistency with other parts of the plan reference should be made to ' <i>active and sustainable travel</i> ' in the policy.	ECC recommend the policy should be amended to read: <p><i>'.....; promoting more <u>active and</u> sustainable means of transport to the site and reducing use of individual trips by car;....'</i></p>
Part 7, Policy SPA3 – Hanningfield Reservoir Special Policy Area, paragraph 3.	For consistency with other parts of the plan reference should be made to ' <i>active and sustainable modes</i> ' in the policy.	ECC recommend paragraph 3 is amended to read: <p><i>'..... optimise opportunities for <u>active and</u> sustainable modes of transport to the site and reduce individual trips by car;'</i></p>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
Part 7, Policy SPA4 – RHS Hyde Hall Gardens Special Policy Area, third sentence.	For consistency with other parts of the plan reference should be made to <i>`active and sustainable modes`</i> in the policy.	ECC recommend the third sentence should be amended to read: <i>`Proposals should promote more <u>active and sustainable modes of transport</u>.....`.</i>
Part 7, Policy SPA5 – Sandford Mill Special Policy Area,	For consistency with other parts of the plan reference should be made to <i>`active and sustainable means of transport`</i> in the policy.	ECC recommend the policy is amended to read: <i>`..... promote more <u>active and sustainable means of transport to the site; provide suitable facilities for visitors; mitigate adverse impacts on cultural heritage or landscape; and increase access to the waterways`.</u></i>
Part 7, Policy SPA6 – ARU Writtle Special Policy Area, paragraph 2	For consistency with other parts of the plan reference should be made to <i>`active and sustainable means of transport`</i> in the policy.	ECC recommend paragraph 2 is amended to read: <i>`.....; promote more <u>active and sustainable means of transport to the site and reduce individual trips by car; and improve the facilities of ARU Writtle.`</u></i>
Part 7, Policy SPA6 – ARU Writtle Special Policy Area, paragraph 7.484	For consistency with other parts of the plan reference should be made to <i>`safe and convenient`</i> cycling and walking connectivity.	ECC recommend paragraph 7.484 is amended to read: <i>New development proposals to the north of the site at West Chelmsford (Warren Farm) will provide improved <u>safe and convenient cycling and walking connectivity</u>.</i>
Part 7, Policy SPA6 – ARU Writtle Special Policy Area,	The policy and/or reasoned justification should note the importance of ARU Writtle to supporting economic objectives, especially around supporting local employment to reduce inequality, opportunities to shift to a greener economy and investment into the rural economy.	
Part 8 ,Policy DM1 – Size and Type of Housing, Part Aii and Part B I and paragraph 8.16	ECC supports the increase in the requirement for new dwellings to achieve requirement Part M, Category 2 (Accessible and adaptable dwellings) M4(2) of Schedule 1 (para 1) to the Building Regulations 2010 (as amended), from 50% to 100% within all development of 10 or more dwellings, as this will help to address the fact that the number of people with disabilities is likely to increase substantially with an ageing population. The policy provides a flexible way to meet a range of Specialist Residential Accommodation needs. The application of this policy still refers to the latest	The output of the commission will provide the necessary evidence to inform Local Plan production and policies. The Housing Lin team will be discussing the outputs of the commission with individual LPAs, including CCC, to ensure the work captures and reflects local data and policy requirements. It is anticipated that the outputs will help inform the Pre-Submission Local Plan and future planning application responses.

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	<p>assessments of local housing need to prioritise the greatest housing need for Specialist Residential Accommodation within the plan period.</p> <p>It is acknowledged that Part C ii requires the provision of Specialist Residential Accommodation within all development of more than 100 dwellings.</p> <p>ECC has commissioned a <i>'Supported and Specialist Housing and Accommodation Needs Assessment'</i> which is being undertaken by Housing Lin. The work commenced May 2024 and is expected to be completed by December 2024. The evidence base will include data on Chelmsford residents who need specialist accommodation to meet their needs due to their age, health, disability, mental health, cognitive ability or living with Learning Disability or Autism.</p> <p>The overarching aim is for the research to answer the following key questions:</p> <ul style="list-style-type: none"> • What is the overall supply and utilised supply (units/beds) of supported and specialist housing and accommodation in Essex for people who are Care Act (2014) eligible for social care as well as others who have support needs which do not meet the Care Act (2014) eligibility threshold but affect their housing needs (this may include temporary as well as permanent provision and privately financed supported/specialist units/beds)? • Within that identified housing and accommodation, what associated support is provided to residents? • What are the challenges faced by County and District, Borough, and City Councils in planning for, delivering and sustaining housing and accommodation and the associated support services, including the unmet needs of those needing wheelchair accessible properties? • <i>How does the housing and accommodation and associated housing and accommodation support provision in Essex compare with other areas in England and the all-England averages?</i> • <i>What is the demand for supported and specialist accommodation (assessment of needs) in the districts and Essex going to look like in 5, 10, 15, and 20 years' time?</i> 	

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	The outputs will enable ECC to provide more detailed evidence of the need for and the type of specialised and supported housing required in Chelmsford, which can inform the preparation of the Pre-Submission Plan (depending on timescales).	
Part 8 , Policy DM1, paragraph 8.17	ECC (Supported and Specialist Housing) would welcome clarity on the process for determining that a commuted sum is acceptable to the LPA, how the commuted sums will be used and what ECC's role will be (if any).	
Part 8, Policy DM4 – Employment Areas and Rural Employment Areas, paragraph 3	<p>ECC support the new text requiring proposals to promote appropriate infrastructure improvements in the designated employment area, and measures to promote sustainable and active travel opportunities to and within the designated employment area.</p> <p>Infrastructure provision for employment areas should also include the provision of multifunctional green infrastructure recognising the wider benefit to the health and wellbeing of the work force and local community, potential to attract investment for instance, while also providing other environmental and social benefits. Planning and design of GI will ensure individual building, street, neighbourhood and landscape scale intervention features contribute to a coherent, meaningful and practical network of high-quality and multi-functional GI.</p>	<p><i>ECC recommend paragraph 3 is amended to read:</i></p> <p><i>Proposals will be expected to consider opportunities to promote appropriate infrastructure improvements in the designated employment area, <u>including multifunctional green infrastructure</u> and measures to promote sustainable and active travel opportunities to and within the designated employment area.</i></p>
Part 8, Policy DM4 – Employment Areas and Rural Employment Areas, paragraph 2. criteria i, v and 8.49	<p>ECC acknowledge that there is often pressure for buildings/plots in employment areas to come forward for other uses, not always sympathetic to the employment nature of the area.</p> <p>ECC support new criteria i and paragraph 8.49 which seeks to prevent the loss of buildings in employment use through changes of use by strengthening the requirement for evidence to be provided, including a comprehensive 12 month marketing campaign, to demonstrate there is no reasonable prospect the site can be used for, or converted to, another policy compliant employment use. This will help ECC deliver our commitments in Everyone's Essex to delivering good jobs, help existing and future businesses and economic sector to grow, and levelling up the economy.</p>	ECC welcomes the new criterion to ensure proposals are appropriate to their location and are not detrimental to the highway network.
Part 8, Policy DM7 – New Buildings and	For consistency with other parts of the plan reference should be made to ' <i>active and sustainable travel</i> ' in criteria v of the policy.	ECC recommend Part A, criteria v is amended to read:

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Structures in the Green Wedge, Part A, criteria v		<i>v. appropriate facilities or infrastructure to support active and sustainable travel; or</i>
Part 8, Policy DM10, Change of Use (Land and Buildings) and Engineering Operations, additional bullets	<p>Change of use applications are defined as ‘<i>included development</i>’ for the purposes of the application of Mineral Consultation Areas, as set out in the MLP, Policy S8, Appendix 5, Part B. Table 9 - Types of proposed development.</p> <p>ECC seek reference to Policy S8 of the Essex Minerals Local Plan as the findings of a Mineral Infrastructure Impact Assessment will be material to the granting of planning permission.</p> <p>However, ECC acknowledges that the Development Plan (including the MLP and WLP) is to be read as whole for the determination of planning applications and the City Council may consider this is adequately covered. ECC is emphasising the importance of effective early engagement with relevant site promoters.</p>	<p>ECC recommend consideration be given to additional bullet points in Part A, B and C to ensure early engagement with the MWPA to read:</p> <ul style="list-style-type: none"> <i>• if in a Minerals Consultation Area, a Minerals Infrastructure Impact Assessment has been submitted and its conclusions are to the satisfaction of the Minerals and Waste Planning Authority.</i> <p>If CCC were to support this amendment it would need to be repeated for B) Green Wedge and C) Rural Area.</p>
Part 8, Policy DM11, Extensions to Existing Buildings Within the Green Belt, Green Wedge and Rural Area, additional bullets	<p>Applications related to existing permissions such as for reserved matters, or for minor amendments to current permissions are defined as ‘<i>included development</i>’ for the purposes of the application of Mineral Consultation Areas, as set out in the MLP, Policy S8, Appendix 5, Part B. Table 9 - Types of proposed development.</p> <p>ECC seek reference to Policy S8 of the Essex Minerals Local Plan as the findings of a Mineral Infrastructure Impact Assessment will be material to the granting of planning permission.</p> <p>However, ECC acknowledges that the Development Plan (including the MLP and WLP) is to be read as whole for the determination of planning applications and the City Council may consider this is adequately covered. ECC is emphasising the importance of effective early engagement with relevant site promoters.</p>	<p>ECC recommend consideration be given to a additional bullet points in Part A, B and C to ensure early engagement with the MWPA to read:</p> <ul style="list-style-type: none"> <i>• if in a Minerals Consultation Area, a Minerals Infrastructure Impact Assessment has been submitted and its conclusions are to the satisfaction of the Minerals and Waste Planning Authority.</i>
Part 8, Policy DM12, Rural and Agricultural/Forestry Workers’ Dwellings,	<p>Proposals for the erection of agricultural buildings immediately adjacent to an existing working farmstead are defined as ‘<i>included development</i>’ for the purposes of the application of Mineral Consultation Areas, as set out in the MLP, Policy S8, Appendix 5, Part B. Table 9 - Types of proposed development.</p>	<p>ECC recommend consideration be given to additional bullet points in Part A, B and C to ensure early engagement with the MWPA to read:</p> <ul style="list-style-type: none"> <i>• if in a Minerals Consultation Area, a Minerals Infrastructure Impact Assessment has been</i>

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additional bullets	<p>ECC seek reference to Policy S8 of the Essex Minerals Local Plan as the findings of a Mineral Infrastructure Impact Assessment will be material to the granting of planning permission.</p> <p>However, ECC acknowledges that the Development Plan (including the MLP and WLP) is to be read as whole for the determination of planning applications and the City Council may consider this is adequately covered. ECC is emphasising the importance of effective early engagement with relevant site promoters.</p>	<i>submitted and its conclusions are to the satisfaction of the Minerals and Waste Planning Authority.</i>
Policy DM16 – Protection and Promotion of Ecology, Nature and Biodiversity, Section D	<p>ECC welcome the reference to the Essex Green Infrastructure Strategy in paragraph 8.132 and the Local Nature Recovery Strategy as part of the policy, which in turn will generate action to promote biodiversity management and improvement (including identifying strategic opportunity areas) and will provide further useful information.</p> <p>As part of the meeting the requirement, Green Infrastructure should be considered and designed to deliver Biodiversity Net Gain and wider environmental net gains, that forms an important component of nature recovery networks and the wider landscape scale GI network.</p>	Consideration to include reference to green infrastructure as part of the BNG delivery.
Policy DM16 – Protection and Promotion of Ecology, Nature and Biodiversity, paragraph 8.135	ECC recommends reference is made to the Essex Green Infrastructure Standards (2022), which should be used as part of the new Local Plan's evidence base and have been endorsed by Natural England and awarded Building with Nature Policy accreditation, 2023.	<p>To also include reference to the Essex Green Infrastructure Standards (2022) in paragraph 8.135.</p> <p><i>The development proposal should be informed by the results of the checklist, any relevant survey and apply the mitigation hierarchy and have regard to the Council's Green Infrastructure Strategic Plan and the Essex Green Infrastructure Strategy and Essex Green Infrastructure Standards.</i></p>
Part 8, Policy DM17 – Trees, Woodland and Landscape Features	To consider as part of the justification the contribution to the Big Green Internet Project that aims to connect woodlands from Tendring via Chelmsford to Epping Forest - https://thebiggreeninternet.co.uk/our-journey/	
Part 8, Policy DM18 – Flooding/SuDS,	ECC recommends consideration is given to the utilisation of Green Infrastructure (GI) and Sustainable Drainage Systems (SuDS). GI and SuDS should be developed together to maximise benefits through	<p>ECC recommend Section C is amended to read:</p> <p><i>As well as providing appropriate water management measures, where possible SuDS should be multi-</i></p>

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Section C, final sentence	<p>multifunctionality. In combination they help reduce flood risk whilst providing biodiversity and amenity benefits.</p> <p>GI can be utilised to help manage surface water run-off. There is a need to include more detail on the benefits of naturalised (GI) SuDS, and for SuDS to be integrated as aesthetic and accessible features within the GI of all developments. Naturalised SuDS provide a high-quality environment for people, by providing amenity value, opportunities for environmental education, delivering safe surface water management systems and improving ecological connectivity.</p>	<p><i>functional to deliver amenity, recreational and biodiversity benefit for the built, natural (including green infrastructure) and historic environment.</i></p>
Part 8, Policy DM19 – Renewable and Low Carbon Energy, bullet iii and paragraph 8.163	<p>ECC recommend criteria iii also makes reference to the opportunity for renewable developments to enhance the natural environment rather than simply not impact upon it.</p> <p>In regard to the delivery of solar farms, ECCs recommends that opportunities to promote biodiversity are explored. Biodiversity can be enhanced on solar farms in a number of ways, including through the establishment of hedgerows, wildflower meadows, bird boxes, insect houses and ponds. For further guidance and information is provided below.</p> <ul style="list-style-type: none"> • <i>BREs National Solar Centre Biodiversity Guidance for Solar Developments</i>, available at: https://www.bre.co.uk/filelibrary/pdf/Brochures/NSC-Biodiversity-Guidance.pdf. This documentation outlines guidance to planners on how biodiversity can be supported on solar farms. • <i>The Longfield Solar Farm EDF study for biodiversity net-gain opportunities</i>. For more information, please contact: James Pateman, Project Manager info@longfieldsolarfarm.co.uk. <p>ECC recommend paragraph 8.163 should also make reference to having regard to the Essex Design Guide - Solar Farm Guiding Principles.</p>	<p>ECC recommend bullet iii) is amended to read</p> <ul style="list-style-type: none"> • <i>can demonstrate no adverse effect on <u>and contribute to the enhancement of the natural environment including designated sites</u>;</i> <p>ECC recommend paragraph 8.163 makes reference to the EDG – Solar Farm Guiding Principles to read:</p> <p><i>The Council's Solar Farm Development SPD and the Essex Design Guide – Solar Farm Guiding Principles provides further detailed guidance on major solar farm development proposals.</i></p>
Part 8, Policy DM20 – Delivery Community Facilities, criteria ii	<p>Reference is made in criteria ii to on-site vehicle parking being provided to an appropriate standard commensurate to the scale of the development, but no reference is made to any standard.</p> <p>ECC recommend the policy or reasoned justification refers to vehicle parking being in accordance with Policy DM27, which refers to the Essex</p>	<p>ECC recommend criteria ii is amended to be in accordance with Policy DM27 to read:</p> <p><i>ii vehicle access and on-site vehicle parking would be provided <u>in accordance with Policy DM27</u> to an</i></p>

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	<p>Parking Standards - Design and Good Practice (2009), or as subsequently amended.</p> <p>These parking standards are currently being reviewed by the Essex Planning Officers' Association (EPOA) and can be viewed here. They have been subject to two consultations with LPAs and developers. The standards are being revised to reflect changes in the new Use Class Orders and national planning policy. Different standards are required in different areas based on levels of accessibility, namely town centres (highly accessible); rural (poorly accessible); and other areas (moderately accessible). Details also cover electric vehicle charging requirements for both residential and non-residential uses. More detailed design guidance is also provided for both residential and commercial cycle parking taking account of LTN 1/20 guidance. Once these standards have been approved it is expected that they will be a material consideration to which new development will need to have regard to at an early stage of the design process.</p>	<p>appropriate standard commensurate to the scale of the development; and</p>
Part 9, Policy DM24 – Design and Place Shaping Principles in Major Developments, paragraph 9.15	<p>Please refer to comments regarding Part 5, Strategic Policy S14 – Health and Wellbeing, paragraph 4 regarding the requirement for all development in Use Class C2 (Residential Institutions) to be subject to HIAs consistent with the requirements set out in the EPOA Essex Healthy Places Advice notes for planners developers and designers, page 11.</p>	<p>ECC recommend paragraph 9.15 is amended to read:</p> <p><i>Larger development proposals (<u>defined as residential development of 50 or more dwellings, all Use Class C2 (Residential Institution) and or more than 1,000sqm of non-residential development</u>) will be required to demonstrate how new development would make a positive contribution to the <u>health and wellbeing of different groups in the population, particularly those who may be more susceptible to poorer health outcomes</u> physical and mental health of the new community through submission of a Health Impact Assessment. Where applicable, development proposals are also encouraged to seek accreditation through the City Council's Livewell Accreditation Scheme.</i></p>
Part 9, Policy DM25 – Sustainable Buildings, Part	<p>It is recommended that ECC supports the principle but not the target set in Policy DM25 (Sustainable Buildings) which continues to require all new dwellings to meet the Building Regulations optional requirement for water efficiency of 110 litres/person/day and to provide rainwater harvesting on site. The Water Strategy for Essex (prepared by ECC) recommends that</p>	<p>It is recommended that ECC supports the principle but not the target set in Policy DM25 (Sustainable Buildings) ECC recommend CCC consider a lower water efficiency standard subject to any impact on plan viability and recommendations of the Water Cycle Study.</p>

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A) Water Efficiency	<p>Local Plan policies should set ambitious policies for water efficiency and resilience for new homes and non-residential development to reduce the impact of water security on economic. The cross-sector recommendations are all linked to the three aims of reducing demand, changing land use for water and funding alternative future supplies.</p> <p>The recently published DEFRA Plan for Water has considered mandating 100 l/p/d in seriously water stressed areas, such as Essex. The Future Homes Hub recently produced the Water Ready: A report to inform HM Government's roadmap for water efficient new homes, published in April 2024, sets recommended Water Efficiency targets for 2025-2035 for water stressed areas from 90-80 l/p/d. As a seriously water stressed area CCC should be looking to set a lower target on usage within the range of 80-100 litre/person/day considering a phased approach. It is important to make the local plan more stringent now so that it will be in line with proposed Government targets before the next local plan iteration and potential water shortages are taken into consideration sooner rather than later.</p> <p>ECC supports the reference in bullet 2 requiring new dwellings to provide rainwater harvesting on site to minimise overall water consumption and maximise its reuse. This is consistent with the ECC SuDS Design Guide.</p> <p>Efforts in design to reduce the water usage of development's built fabric will take significant strides in reducing overall demand. If we do not take action to use less water and create more sources of water supply, supply shortages and restrictions will become a reality. These will prevent new homes being built, new businesses being set up in Essex, and reduce the amount of food that can be grown here.</p>	
Part 9, Policy DM25 – Sustainable Buildings, Part B) Electric Vehicle charging point infrastructure	<p>ECC supports reference to development being required to have regard to the standards set out in the Essex Part 1 Parking Guidance when determining planning applications. Once completed this guidance will be placed on the Essex Design Guide. The standards set out details for the level of provision, types of charging infrastructure, and design guidelines.</p> <p>ECC has prepared an Electric Vehicle Charge Point Strategy to deliver 'the Right Charger in the Right Place' so that by 2030, residents, businesses and visitors in Essex, where car travel is necessary, will be able to use</p>	

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	<p>electric vehicles and be assured there is an accessible, reliable, easy-to-use, safe and fairly priced charging network. The strategy focuses on how EV charging infrastructure can be delivered in the county and what ECC can enable others to deliver up to 2025. The Strategy will be refreshed by 2025 (Phase 2 Strategy) to look at longer-term private car use and EV uptake. It will explore the supply of renewable energy to EV charge points and how the conversion of public transport, taxis and freight vehicles to cleaner fuels can be achieved. Separate strategies will be developed to provide for alternative clean and zero emission fuels, such as hydrogen.</p>	
<p>Part 9, Policy DM31 – Net Zero Carbon Development (in operation), page 299 and Reasoned Justification</p>	<p>ECC welcome and support the inclusion of Policy DM31 in the plan. Chelmsford City Council is among the frontrunner local planning authorities in Greater Essex to embed in their emerging local plan the planning policy approach to ‘net zero’ that has been developed collaboratively through the Essex Planning Officers’ Association with the Greater Essex local planning authorities.</p> <p>Policy DM31 and Reasoned Justification is based on the ‘Planning Position for Net Zero Carbon Homes and Buildings in Greater Essex (2023)’.</p> <p>This work (facilitated by the Climate and Planning Unit at ECC, with funding from the Essex Climate Action Commission) has developed a robust and sound evidence base that shows that building to the clearly defined net zero carbon (in operation) standard is technically feasible, financially viable and legally justified as set out in the Essex Design Guide.</p> <p>Publishing the Essex ‘model’ policy approach also provides clarity and certainty to the development industry and other stakeholders on what we mean by ‘net zero’ in terms of new build development in Greater Essex. The approach also broadly aligns with policies adopted in local plans by other ‘front runner’ authorities in Cornwall, Bath and North East Somerset, and Central Lincolnshire.</p> <p>Applying the policy will ensure that new homes and buildings are built to a net zero carbon (in operation) standard that delivers net zero carbon emissions from the point of occupation, achieves operational energy balance on site and aligns with local and national climate targets.</p>	<p>Please refer to Section 9 – Policy DM31 – <u>Omission</u> comment</p>

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Part 9 – Paragraph 9.38	ECC recommend a typographical amendment in paragraph 9.38 to change reference from <i>3a</i> to 3i .	ECC recommend a typographical amendment to read: <i>For clarity, the EUI target set out in 3i applies to residential uses which include: dwellinghouses, flats, self-contained residential units (C3) and houses of multiple occupation (C4).</i>
Part 9 – Paragraph 9.40	ECC recommend a typographical amendment in paragraph 9.38 to change reference from <i>3a</i> to 3i and 3b to 3ii .	ECC recommend a typographical amendment to read: <i>For other residential and non-residential typologies (that are not covered under 3i or 3ii), applicants are expected to comply with all other policy requirements, except Requirement 3: Energy Use Intensity limits.</i>
Part 9, Policy DM31 Table 7 - Minimum Standards Approach Fabric Specifications (Domestic)	ECC require amendments to Table 7 to improve clarity and which will be reflected in a revised Essex 'model policy' document net-zero-carbon-planning-policy-for-greater-essex-november-2023.pdf (essexdesignguide.co.uk) in due course.	ECC recommend Table 7 is amended to read: <ul style="list-style-type: none"> • Include 'Detached' in the column heading Terrace / Semi-detached House • Replace 'Air permeability' with 'Air tightness'. The '<1 arch' should be '<1 ach@50Pa' and consider adding a footnote to explain that this means 'less than 1 air change per hour at 50 pascals'
Local Plan Viability Update August 2023	<p>The Essex Evidence Base has been enhanced and strengthened further since the update to the Local Plan Viability report was undertaken. Specifically, the Essex Net Zero Policy Study has been completed and published (July 2023) and Report 1 – Technical Evidence includes a detailed cost analysis of delivering development to meet the Essex 'model policy' and hence Chelmsford Local Plan policy DM31 Net Zero Carbon Development (in operation).</p> <p>The costs are presented as an uplift on the current 2021 Building Regulations baseline. Please refer to Section 11 (page 46 –50) of Report 1 – Essex Net Zero Policy Study - Technical evidence (Introba, Etude and Currie & Brown, July 2023) The costs presented in the report are the ones to input into the update of the local plan viability study. The report notes that these are similar or lower to the costs identified in the earlier Essex Net</p>	ECC require the update to the Local Plan Viability Study to reflect the costs identified in Section 11 (Page 46-50) of Report 1 of the Essex Net Zero Policy Study – Technical Evidence (Introba, Etude, Currie & Brown July 2023)

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	Zero Carbon Viability and Toolkit Study (Three Dragons, August 2022) which is positive for viability.	
Part 9, Policy DM31, paragraphs 9.74 - 9.76	<p>The Reasoned Justification to Policy DM31 recognises the important need to consider overheating risk when designing new buildings, and that measures to mitigate potential overheating risk from both current and future climate should be incorporated. This will help ensure more climate resilient homes and buildings are achieved to the benefit of the comfort, health and wellbeing of residents and occupiers.</p> <p>ECC suggest that CCC consider developing the points raised in the RJ into a specific Policy to give greater weight to mitigating overheating risk in new development proposals. ECC would support such an approach.</p>	<p>ECC recommend that CCC consider developing the reasoned justification text into a specific overheating risk policy so that it carries more weight. ECC is keen to help and advise on its drafting.</p>
Section 9 – Policy DM31 - Omission	<p>The carbon emissions that result from the materials and construction process of new development is not currently addressed through the Preferred Options consultation document. CCC opted not to include the placeholder Policy NZ2 – Net Zero Carbon Development – Embodied Carbon until this commissioned evidence to had been completed.</p> <p>By progressing the work on embodied carbon, ECC is supporting the delivery of the Essex Climate Action Commission targets (as set out in the Net Zero: Making Essex Carbon Neutral Report 2021 and which are fully endorsed by ECC in the Essex Climate Action Plan of ensuring that all new planning permissions for homes and buildings are net zero carbon (in operation) by 2025 and are carbon positive by 2030.</p> <p>ECC is currently working collaboratively with Greater Essex authorities to establish a new ‘model’ planning policy approach that minimises the carbon emissions that are emitted through the materials used in a development and the construction process (known as ‘upfront embodied carbon emissions’). This model policy can then be embedded into new and emerging local plans.</p> <p>To underpin this work, the Essex Embodied Carbon Study (with funding from the Essex Climate Action Commission) has been commissioned which will establish an evidence base and provide recommendations for a</p>	<p>ECC recommend CCC incorporate the new Essex evidence-led ‘model policy’ to address embodied carbon emissions from new development into the Pre-Submission Plan and its supporting evidence base.</p> <p>The intention is to publish an update to the ‘Planning policy position for net zero carbon homes and buildings in Greater Essex November 2023’ and incorporate the new Essex specific ‘model’ embodied carbon policy. This will replace the current ‘placeholder’ embodied carbon policy included in the position document.</p>

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	<p>planning policy approach. The Study is currently in final draft stage and is anticipated to be ready for publication on the Essex Design Guide in June 2024.</p> <p>A 'model policy' approach will then be drafted in line with the evidence base and in collaboration with the Greater Essex planning authorities, through the Climate planning policy support group led by the Climate and Planning Unit at ECC.</p>	
Part 10, Monitoring, page 326	<p>ECC recommend the 'Key Trigger' and 'Trigger for Action' should be amended to reflect ECC comments on the need for an HIA to also be required for all development in Use Class C2 (Residential Institutions) to be consistent with the requirements set out in the EPOA Essex Healthy Places Advice notes for planners developers and designers, page 11 and the ECC response to the Local Validation List Update in March 2024.</p> <p>Target – reference is only made to 'large scale development'. Should reference be made to 'initial assessments' given ECC comments made to Strategic Policy S14 – Health and Wellbeing, paragraph 5.26. ECC seeks further clarification with regards the process and details to be undertaken with regards 'an initial assessment' for developments. Public Health England (PHE) guidance for Health Impact Assessment and the Essex Healthy Places Guidance highlight the types of HIA, such as desktop, rapid and full/comprehensive.</p> <p>ECC consider that CCC should consider ways of monitoring HIAs beyond just the number completed, focusing also on those that positively influence proposals. Implementing a quality assurance process with local public health practitioners can support this, using a locally established protocol for public health engagement as with the Livewell Accreditation scheme. This is supported by the recommendation of the Integrated Impact Assessment (IIA), paragraph 5.12.2, Recommendation 2, page 201, which states:</p> <p><u>2. There should be reference within Health and Wellbeing (Strategic Policy S14) as to how the aspirations will be measured and the criteria which could be used to determine success.</u></p>	<p>ECC recommend an amendment to 'Key Trigger' to read:</p> <p><i>Number of Health Impact Assessments on development for 50 or more dwelling, C2 (Residential Institutions) and non-residential development in excess of 1,000 m2</i></p> <p>and 'Trigger for Action' to read:</p> <p>(1) <i>Health Impact Assessment is not submitted on one or more development for 50 or more dwellings, one or more C2 (Residential Institutions) and one or more non-residential development in excess of 1000 m2</i></p> <p>ECC recommend CCC should consider an additional indicator that captures how HIA's are effectively and positively influencing proposals and achieving what they are set out to do.</p>

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	ECC Spatial Planning and Public Health are currently developing a programme to further support the link between Planning and Public Health at both County and District levels. This programme aims to support local public health practitioners in working with planning policy and development management on the use of HIAs. Monitoring the effectiveness of HIAs through established protocols between planning and public health will enhance the local processes of implementing HIAs and ensure positive outcomes.	
Topic Papers		
Climate Change, Infrastructure and Transport	ECC was actively involved in assisting with the drafting of the Climate Change, Infrastructure and Transport Topic Papers and is supportive of their content. ECC will seek to work collaboratively with CCC to refresh these to inform the Pre-Submission Plan.	Note support.
Employment	Reference should be made to the Local Skills Improvement Plan (LSIP) for Essex, Southend and Thurrock which provides detail on local economy requirements for skills and how to deliver the priorities. The LSIP is supplemented by annexes which go into further detail on local strategic context , methodologies and processes , and data and intelligence . This has been accompanied by the Local Skills Improvement Fund (LSIF) providing colleges and providers with capital and revenue funding to support programmes, facilities and equipment to deliver against the LSIP.	Reference should be made to the Local Skills Improvement Plan (LSIP) for Essex, Southend and Thurrock which provides detail on local economy requirements for skills and how to deliver the priorities.
Health and Wellbeing, Paragraph 3.11	<p>ECC welcomes the findings of the ongoing Integrated Impact Assessment (IIA), which incorporates a Health Impact Assessment (HIA) and considers the need to reduce obesity and increase physical activity as a key sustainability issue under the overall appraisal framework objective of improving health and wellbeing.</p> <p>It is noted within the health and wellbeing topic paper <i>“Planning policies and supplementary planning documents can, where justified, seek to limit the proliferation of particular use where evidence demonstrates this is appropriate (and where such uses require planning permission). Engagement is needed with local public health colleagues and Health and Wellbeing Boards for evidence.”</i> Additionally, the NPPG (paragraph: 004 reference ID:53-004-20190722) states that planning can influence the built environment to improve health and reduce obesity and excess weight in local communities, partly through access to healthy foods.</p>	<p>With the recent adoption of the Essex Healthy Weight Strategy, ECC believes that CCC should also consider the impact of the proliferation of hot-food takeaways as part of improving access to healthier food, particularly around schools if evidence supports this, to address obesity as identified in local and county health and wellbeing strategies.</p> <p>ECC is an advocate for promoting healthier food environments. The Essex Healthy Weight Team (Public Health) can provide advice on the evidence base, highlighting areas within the district where there are higher than average levels of obesity in parts of the district, areas of deprivation/obesity.</p>

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	<p>The Essex Health and Wellbeing Board recently endorsed the first Essex Healthy Weight Strategy, which highlights the need for a whole-system and strategic approach to joining up collective efforts in preventing and treating excess weight in Essex. This issue has a significant impact on population health.</p> <p>It is positive to note the reference to, and objectives of, encouraging food growing opportunities to improve access to local healthy food. With the recent adoption of the Essex Healthy Weight Strategy, ECC believes that CCC should also consider the impact of the proliferation of hot-food takeaways as part of improving access to healthier food, particularly around schools if evidence supports this, to address obesity as identified in local and county health and wellbeing strategies.</p> <p>The Essex Healthy Weight Strategy prioritises addressing factors that influence the food environment, ensuring that the environment in Essex supports and enables people to maintain a healthy weight and minimizes the risks of excess weight. Some focus areas include healthy food and drink advertising policies and how new developments can support healthier food provision. It is recognised that obesity is complex with many inter-relating factors contributing to excess weight and the above approaches are a part of system wide actions.</p> <p>As noted within the Health and Wellbeing Topic Paper, the food environment plays an important role in promoting a healthier diet. The IIA also highlights mitigation measures (page 738) which include promoting access to healthy and locally sourced food, providing communal and individual food growing opportunities, ensuring provision and access to local food shops, limiting access to hot food takeaways (e.g., limits on distances from schools or limits on the proportion within town and city centres).</p> <p>In supporting the development of the Essex Healthy Weight Strategy, the ECC Healthy Weight and Public Health Intelligence Team have produced an evidence base to support the strategic priorities of the Strategy. This includes district findings on childhood obesity, highlighting levels of obesity by various factors such as deprivation. Evidence shows that in Chelmsford,</p>	<p>CCC should consider use of the Food Environment Assessment Tool (FEAT), which enables detailed exploration of the geography of food retail access across England. This tool is underpinned by the latest scientific evidence about how food access in our neighbourhoods affects our dietary choices and body weight.</p>

Document Reference	COMMENTS	ECC Recommended Policy and Reasoned Justification Changes
	excess weight (overweight or very over overweight) continues to be higher among reception and year 6 children in more deprived areas compared to those living in less deprived areas on the Indices of Multiple Deprivation (IMD, 2019).	