
CHELMSFORD LOCAL PLAN – SUBMISSION FOR EXAMINATION IN PUBLIC

1. The attached report was considered by the Development Policy Committee on 7 June 2018 and will be discussed by the Cabinet on 13 June 2018. The report requests both to consider the main issues arising from the consultation on the Pre-Submission Chelmsford Local Plan (Publication Draft), undertaken in accordance with Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012. Those issues are set out in the Regulation 22 Statement attached at Appendix 2 of the report and the proposed Schedule of Additional Changes set out at Appendix 8.
2. All the appendices referred to in the report have been published on the Council's website with the agenda for the Development Policy Committee on 7 June. Paper copies have also been placed in the Group Rooms at the Civic Centre.
3. The Development Policy Committee meeting heard a number of representations about various aspects of the Local Plan. As well as responding to those representations, officers outlined to the Committee the process for the production of the Local Plan, the principles on which it was based and the issues it needed to consider before it made any recommendation to the Cabinet and Council on the Submission Documents. The Cabinet was also asked to give due consideration to those issues.
4. The Development Policy Committee recommended that:
 1. having considered the main issues arising from the consultation on the Pre-Submission Chelmsford Local Plan (Publication Draft) alongside the proposed Submission Documents and supporting evidence base and documentation set out in Sections 9 and 10 of the report to the meeting and appended or referenced to it, the Cabinet and Council be recommended formally to approve the Chelmsford Local Plan for Submission to the Secretary of State in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012;
 2. the Cabinet be requested to recommend that the Council authorise the Director of Sustainable Communities or the Planning and Strategic Housing Policy Manager to prepare and approve the necessary statements, evidence and documentation which are required as part of the Submission and Independent Examination of the Chelmsford Local Plan; and
 3. the Cabinet be recommended to authorise the Director of Sustainable Communities to assess the Homes England Garden Towns and Village Programme Prospectus when published, and after consultation with the Cabinet Member for Planning and Economic Development, decide whether the City Council in conjunction with partners should submit a bid to Homes England.
5. The Cabinet was due to consider the recommendations of the Committee at its meeting on 13 June 2018 and its decision will be conveyed to members of the Council by way of an addendum to this report either before or at the Council meeting on 19 June.

RECOMMENDED that, subject to any comments the Cabinet might have on the Chelmsford Local Plan Submission Documents, the Council resolve in the terms set out in recommendations 1 and 2 above from the Development Policy Committee on 7 June 2018.

DEVELOPMENT POLICY COMMITTEE

7 June 2018

AGENDA ITEM 6

Subject	CHELMSFORD LOCAL PLAN – SUBMISSION FOR INDEPENDENT EXAMINATION
Report by	DIRECTOR OF SUSTAINABLE COMMUNITIES

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Purpose

The purpose of this report is to seek the Committee's consideration of: i) the main issues arising from the Regulation 19 Pre-Submission consultation of the Chelmsford Local Plan; and ii) the resulting proposed Submission Documents, with a view to recommending to the Council's Cabinet that approval from Full Council be sought to submit the Chelmsford Local Plan to the Secretary of State for Independent Examination.

Recommendation(s)

1. That the Committee consider the main issues arising from the consultation on the Pre-Submission Chelmsford Local Plan (Publication Draft), undertaken in accordance with Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012, set out at in the Regulation 22 Statement attached at Appendix 2 of this report and the proposed Schedule of Additional Changes set out at Appendix 8 of this report.
2. That the Committee consider the proposed Submission Documents and supporting evidence base and documentation set out in Sections 9 and 10 which are appended where relevant to this report and recommend to the Council's Cabinet to refer these documents to Full Council with a recommendation that the Chelmsford Local Plan be formally approved for Submission to the Secretary of State in accordance with Regulation 22 of the Town and Country Planning (Local Development) (England) Regulations 2012.

3. That the Committee recommend to the Council's Cabinet and then referred to Full Council, that the Director of Sustainable Communities or the Planning and Strategic Housing Policy Manager be authorised to prepare and approve the necessary statements, evidence and documentation which are required as part of the Submission and Independent Examination of the Chelmsford Local Plan.
4. That the Committee recommend to the Council's Cabinet that the Director of Sustainable Communities be authorised to assess the Homes England Garden Towns and Village Programme Prospectus when published, and after consultation with the Cabinet Member for Planning and Economic Development decide whether the City Council in conjunction with partners, submit a bid to Homes England.

Corporate Implications	
Legal:	Compliance with Government requirements for the preparation of statutory Development Plan documents
Financial:	The preparation of a Local Plan is a major area of work, extending over a three-year period, and involves significant financial resources for Evidence Base preparation, Public Consultation, Sustainability Appraisal work, legal fees and Examination by the Planning Inspectorate. Current work is being met from the approved Budget for 2018/19.
Personnel:	None
Risk Management:	Potential risk of Government intervention if the City Council does not progress a new Local Plan.
Equalities and Diversity:	An Equality and Diversity Impact Assessment has been undertaken for the Council's emerging new Local Plan.
Health and Safety:	None
IT:	None
Other:	None
Consultees	This report has been prepared following consultation with other Directorates within the City Council and Essex County Council as a principal partner in this work.

Policies and Strategies

The report takes into account the following policies and strategies of the Council:

Local Development Framework (LDF) Documents

Core Strategy and Development Control Policies - Adopted DPD

Focused Review of Core Strategy and Development Control Policies – Adopted DPD

Chelmsford Town Centre Area Action Plan - Adopted DPD

North Chelmsford Area Action Plan – Adopted DPD

Site Allocations Development Plan Document – Adopted DPD

Planning Obligations SPD – Adopted SPD

Duty to Co-operate Strategy – Adopted Strategy

Statement of Community Involvement – Adopted and Draft Documents

Local Development Scheme – Adopted Document

The Chelmsford Local Development Framework takes into account all published strategies of the City Council, together with the Sustainable Community Strategy published by The Chelmsford Partnership.

Corporate Plan Priorities

The report relates to the following priorities in the Corporate Plan

Attracting investment and delivering infrastructure	✓
Facilitating suitable housing for local needs	✓
Providing high quality public spaces	✓
Promoting a more sustainable environment	✓
Promoting healthier and more active lives	✓
Enhancing participation in cultural activities	✓

1 Introduction

- 1.1 This report seeks the Committee's consideration of the main issues arising from the Regulation 19 Pre-Submission consultation of the Chelmsford Local Plan and the resulting proposed Submission Documents. A recommendation is sought from the Council's Cabinet to seek approval from Full Council to formally submit the Chelmsford Local Plan to the Secretary of State for Independent Examination.

Background

- 1.2 The current Chelmsford Local Development Framework (LDF) covers the period from 2001 to 2021 and comprises a suite of development plan documents which were adopted between 2008 and 2012. It is widely acknowledged that the LDF has been instrumental in driving forward the planned growth of Chelmsford, in conjunction with bodies such as Essex County Council and other private sector interests.
- 1.3 Chelmsford's existing LDF has a plan period covering the period to 2021. National planning policy requires local planning authorities to put in place Local Plans which provide certainty for the supply of housing land for a period up to ten years ahead, and preferably for up to fifteen years. Local Plans also need to have proposals for economic growth, infrastructure development and other specific requirements such as the provision of specialist housing and the protection of important natural and historic assets.

- 1.4 Chelmsford has been a focus for development growth and this is set to continue, especially in light of being England's newest city and a focus for shopping, employment and leisure.
- 1.5 It has therefore been necessary to prepare a new Local Plan for Chelmsford. This will cover the period up to 2036 and once adopted will supersede and replace the LDF in its entirety from the date of the new Local Plan's adoption.

2 Context

- 2.1 The importance of having an up-to-date Local Plan for the future development and growth of a local authority's area has never been greater. It is a major element of current Government policy that local authorities put in place Local Plans which address their future housing and economic growth requirements as speedily as possible. Ministerial statements have confirmed that Government will intervene in Local Plan preparation, where a local authority is not progressing with the timely production of their Local Plan.
- 2.2 Officers consider the Pre-Submission Local Plan sound and ready to submit for Examination. Although officers are proposing additional changes to the Pre-Submission Local Plan, these are considered minor and do not go to the soundness or the heart of the Plan or its strategy. At this stage of plan preparation, any major or significant changes would require the Council to re-assess the plan and to potentially repeat previous stages of preparations.

National Planning Policy

- 2.3 The National Planning Policy Framework (NPPF) 2012 and the national Planning Practice Guidance (PPG), provide the starting point for the preparation of Local Plans. In addition, there are the requirements of the Localism Act, 2011 which include, for example, the introduction of Neighbourhood Plans as part of the statutory development plan system.
- 2.4 Consistency with the NPPF is one of the tests of soundness considered at the Independent Examination of Local Plans. Alongside the NPPF, the PPG provides more practical guidance for the implementation of national planning policy. This Pre-Submission Local Plan alongside the other Submission Documents has taken full account of, and is consistent with, the provisions of national planning policy and guidance.
- 2.5 The Government published for consultation draft revisions to the NPPF in March 2018. This follows previous consultations on a new Housing White Paper in February 2017 and 'Planning for the right homes in the right places' in September 2017.
- 2.6 The draft revisions to the NPPF contain many of the proposals within the Housing White Paper with the main aim to accelerate housing delivery. This includes the proposed standardised method for calculating housing need and a new Housing Delivery Test to ensure housing delivery is accommodating housing need. There are further proposed revisions to the NPPF which affect the preparation and examination of Local Plans such as revisions to the tests of soundness.

- 2.7 The Pre-Submission Local Plan allocates housing sites that overall provide nearly 20% more housing over the plan period than the Council's current objectively assessed housing need (805 homes per year). This means that the Spatial Strategy of the Pre-Submission Local Plan can accommodate the emerging new standardised housing number which is calculated for the period 2016-2026.
- 2.8 The draft revisions to the NPPF contain a six-month transitional period for its full implementation after the final version is published. The consultation period for the draft revisions to the NPPF closed on 10 May 2018. It is the Government's intention to publish the new amended NPPF in the summer of 2018. On this basis, Local Plans submitted for Independent Examination before the end 2018 will be assessed against the existing NPPF published in 2012. As all Local Plans are required to be reviewed every five years, the review of the Chelmsford Local Plan will need to have full regard to all subsequent changes to national planning policy. As set out in Strategic Policy S15 Monitoring and Review of the Pre-Submission Local Plan, a formal review of Chelmsford's Local Plan will start in 2022.

Duty to Co-operate

- 2.9 A key element when producing a local plan is to demonstrate that the separate legal requirement under the 'Duty to Co-operate' has been met. The NPPF states that local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in local plans. This process should be demonstrated by evidence of having effectively co-operated.
- 2.10 Considerable work has also been undertaken under the Duty to Co-operate throughout the preparation of the Local Plan. The City Council signed a Memorandum of Co-operation (MOC) with the Housing Market Area (HMA) partner authorities (Braintree, Colchester and Tendring) in June 2016. The MOC sets out key strategic issues that have been considered collaboratively and Chelmsford has been working closely with the other authorities, in particular on a joint housing need evidence base. Braintree, Colchester and Tendring Councils have produced a joint strategic Part 1 Local Plan, and combined with the Chelmsford Local Plan, the objectively assessed housing and employment need for the HMA is being met in full.
- 2.11 Meetings and co-operation have continued with Essex County Council, other local authorities in Essex, key utility service providers such as Anglian Water, the principal health and education providers in Chelmsford and with other key partners such as Highways England and other Duty to Co-operate bodies. These meetings have been valuable in enabling issues affecting the future growth of Chelmsford to be identified and addressed, and for officers to develop partnerships with those bodies to take forward the preparation of the Local Plan.
- 2.12 As part of the previous Local Plan consultation, the City Council received requests to consider helping meet some of the housing need from a number of South Essex local authorities. As part of the on-going engagement required by the Duty to Co-operate, Members and Officers have been meeting and corresponding with these authorities.

- 2.13 This has culminated in the preparation of an Essex-wide guidance note entitled a Mechanism for the Consideration of Unmet Housing Need which has been agreed by the Essex Planning Officers' Association (EPOA) a body which contains representation from all Essex local planning authorities.
- 2.14 The need for a similar Essex-wide guidance note for unmet Gypsy and Traveller accommodation has also been identified by the EPOA. Officers from Chelmsford are members of small working group that has been set up to progress this work which is at the early stages of preparation.
- 2.15 Amendments were made in the Pre-Submission Local Plan to respond to issues raised by neighbouring local authorities and the City Council will monitor how the EPOA guidance note on assessing unmet housing need is being implemented. These changes made clear that the consideration of any unmet housing need demonstrated through the application of the EPOA guidance note would be considered by the City Council through a review of the Local Plan.
- 2.16 The South Essex authorities have decided to start work on a joint strategic plan – South Essex 2050. The South Essex authorities are following the steps in the EPOA guidance note and national planning policy and guidance to consider housing need strategically across their Housing Market Area in order to determine whether there is any unmet housing need. As such, there are no representations to the Pre-Submission Chelmsford Local Plan from neighbouring local authorities that state that the Duty to Co-operate has not been met or there is any requirement to meet any unmet housing need.
- 2.17 With regard to other strategic planning issues, the Council has been working closely with other Duty to Co-operate bodies. A Duty to Co-operate Compliance Statement has been produced which sets out the actions and outcomes undertaken through the Duty to Co-operate in the production of Chelmsford's Local Plan. This statement is set out at Appendix 1.

Housing Infrastructure Fund

- 2.18 In late September 2017 Essex County Council, with support from the City Council, submitted a bid of £250 million to the Government's Housing Infrastructure Fund to support the delivery of Beaulieu Station and the first phases of the Chelmsford North East Bypass. This was identified as the number one project priority in Essex. In March 2018, the Government announced that it will be working with 44 areas in England to develop their bids to the next stage. Three bids in Essex, including the Chelmsford bid have moved to this next stage of development. During the coming months Essex County Council will be developing the business case to support the bid in conjunction with Homes England.

Garden Communities Prospectus

- 2.19 Homes England (formerly the Homes and Community Agency) have confirmed that there will be a further prospectus to bid under the Gardens Town and Villages programme in the Spring/Early Summer 2018. A bid could be submitted for the potential inclusion of the proposed major development in North East Chelmsford (Strategic Growth Site 4) in this programme as the development consortium behind this site are promoting it as North East Chelmsford Garden Village.

- 2.20 Officers will consider the Home England prospectus when published and investigate a potential bid in conjunction with relevant partners.

3 Pre-Submission Local Plan (Publication Draft) Consultation

Context

- 3.1 The Pre-Submission Local Plan sets out the Council's final proposed Vision, Policies and Proposals to guide future development and the use of land in the period up to 2036. In addition to the existing committed development within the adopted LDF it makes provision for a further 10,135 new homes and 68,400 sqm floorspace for new employment development. This meets the Council's objectively assessed development needs of 805 new homes and 725 new jobs per year whilst providing a buffer. The Spatial Strategy outlines that this new development will be focused on previously developed land in Chelmsford Urban Area, urban extensions around Chelmsford and SWF, and extensions to the larger villages outside of the Green Belt.
- 3.2 The Regulation 19 Pre-Submission Local Plan consultation followed two earlier Regulation 18 consultations – Issues and Options - consulted on in Winter 2015/16; and Preferred Options, consulted on in Spring 2017. Representations made in respect of these earlier consultations have been considered alongside updated evidence in preparing the Pre-Submission Local Plan. Two 'You Said, We Did' Feedback Reports were produced after each of these earlier consultations which have been incorporated into the Regulation 22 Statement set out at Appendix 2 of this report.

Pre-Submission Local Plan Document and Policies Map

- 3.3 The Pre-Submission Local Plan was formulated taking into account the amount of new development required, the evidence base, national planning policy and guidance, and the feedback from previous rounds of formal public consultation.
- 3.4 The detail of the Pre-Submission Local Plan was reported to the meeting of the Development Policy Committee on 18 January 2018 which can be found on the Council's website at www.chelmsford.gov.uk/your-council/committees-and-meetings/ A summary of the content of the Pre-Submission Plan is also set out in the January 2018 Local Plan newsletter at Appendix 3 of this report.

Consultation Feedback

- 3.5 The Pre-Submission Local Plan consultation followed a more formal approach where respondents are required to frame their representation as to whether the Local Plan is:
- Prepared in accordance with the Duty to Co-operate
 - Legally and procedurally compliant
 - Sound – positively prepared, justified, effective, consistent with national policy
- 3.6 As the Pre-Submission Local Plan is the final stage of Local Plan preparation, the representations received at this stage are those considered by the Inspector appointed by the Secretary of State to undertake the independent examination.

- 3.7 The Pre-Submission Local Plan (Publication Draft) was published on 30 January 2018 for a six-week consultation period which closed on 14 March 2018.
- 3.8 The consultation process was very wide ranging and exceeded statutory requirements. Some of the ways it was promoted included sending out over 6,280 email or letter notifications, public notice, placing adverts in local publications, issuing press releases, circulating posters, providing tweets and holding 13 public drop-in exhibitions.
- 3.9 A total of **695 respondents** submitted representations generating **2,001 separate responses** which were 'duly made' pursuant to Regulation 20 of the Development Plan Regulations. Although this is a high level of response, it is less than the previous stages of consultation for Issues and Options in 2015/16 and Preferred Options in 2017.
- 3.10 **71** of the separate comments received were considered to be partly 'inadmissible' due to their content and have had the inadmissible text redacted. Eight representations were received in paper form which either had no name or address included so have not been accepted. These objected to development at Strategic Growth Sites 2 (West Chelmsford) and 7 (North of SWF), generally in relation to increased traffic congestion but raised no new issues not already set out by other local resident's comments. One comment, from Mid Essex Hospital Services NHS Trust was received after the consultation period and had not indicated any issue submitting the comments on time. This was due to staffing changes at the Trust and an extension of time was agreed with the City Council. As such, this comment has been accepted and analysed.
- 3.11 Individuals and organisations were able to respond to the consultation in a number of ways – using the Council's Consultation Portal, by e-mail, or in writing. Respondents made their comments in the following ways

Document	Email	Consultation Portal	Letter
Pre-Submission Local Plan	306	271	125

- 3.12 Of the figures above, seven respondents made their comments in multiple ways. In addition, of these comments received, two were petitions. One petition contains 1,316 signatures calling for the inclusion of Hammonds Farm as a New Settlement east of A12 in the Local Plan, and the other contains 641 signatures supporting the decision not to include Hammonds Farm in the Local Plan.
- 3.13 Representations have been received from a wide range of groups and individuals including residents, community groups, developers/landowners, and statutory bodies such as other local authorities, Essex County Council, Parish/Town Councils, Historic England, Natural England and the Environment Agency.
- 3.14 A further **62 responses** were received to the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) and **12 responses** to the Habitats Regulations Assessment (HRA) prepared by consultants for the Council.

- 3.15 Every individual response to the Pre-Submission Local Plan, the SA and HRA are available to view in full on the Council's online consultation system 'Objective' at <http://consult.chelmsford.gov.uk/portal>. All respondents have received an acknowledgement for their comments and been notified of this Committee meeting.
- 3.16 As part of the consultation a further opportunity was given to submit sites to the Strategic Land Availability Assessment (SLAA). An additional 18 sites were submitted at the Pre-Submission stage. It is not considered necessary or appropriate to amend the Council's Spatial Strategy at this stage of plan preparation. However, for completeness, any new site that has been considered a 'reasonable alternative' has been assessed through the Sustainability Appraisal Addendum set out at Appendix 4.
- 3.17 Regulation 22 of the Development Plan Regulations require local planning authorities to summarise the main issues raised by the Regulation 18 and 20 representations and provide the full copies of Regulation 20 representations (those received to the Pre-Submission consultation) to the Inspector when the Local Plan is submitted for independent examination. Although there is no requirement for the Council to provide a response to individual Regulation 20 representations, they have all been carefully considered by officers.

4 Main Issues arising from the Consultation

- 4.1 There is a requirement for the Council to set out the main issues that have arisen from the Pre-Submission Regulation 19 consultation. The main issues are set out in full, in order of the Pre-Submission Local Plan, within the Regulation 22 Statement. This also sets out the number of representations made to each question and section/para/policy/map/table of the Local Plan.
- 4.2 This Regulation 22 Statement is set out at Appendix 2 of this report. A summary of the key main issues is set out below:

General

- Overall support for the Pre-Submission Local Plan's (PS LP) aim to meet the City's full development needs, maximise use of brownfield sites and to protect the Green Belt in line with the Spatial Principles.
- While there is a general recognition of the need for more housing and jobs, there is a significant amount of concern over whether Chelmsford can cope with further growth given existing problems especially with traffic congestion and infrastructure capacity.
- Mixed responses on whether the PS LP is considered Sound, it should be noted that anyone seeking a change to the PS LP, however minor in nature, should indicate that the document is unsound and/or not legally compliant.

Procedural and Legal Compliance

- Objections raised from promoters of Hammonds Farm, which is not allocated in the Local Plan with regard to the manner in which their site was tested and consulted upon as a reasonable alternative site.

- Objections from Stow Maries Parish Council, an adjoining Parish Council within Maldon District Council, are challenging the Local Plan consultation process.

Duty to Co-operate

- All the bodies and organisations that are subject to the Duty to Co-operate with CCC agree that the Council has satisfied its Duty to Co-operate obligations. This includes all responding neighbouring Councils, Essex County Council (ECC), the Environment Agency and Natural England, although they may raise issues of soundness.

Soundness

- Public comments – Majority of comments are objection to allocations in the Pre-Submission Local Plan, most notably in West Chelmsford and North of SWF. There is also a high level of opposition to growth in East Chelmsford, North of Broomfield Hospital and Great Leighs. Key concerns relate to traffic and increased congestion on local roads, a lack of supporting infrastructure especially schools and health facilities, increase risk of flooding and landscape impact.
- Statutory Environmental Bodies comments – The Environment Agency support the Pre-Submission Local Plan overall, subject to minor wording changes. Natural England broadly supports the Pre-Submission Local Plan (PS LP) and considers that the majority of their concerns can be rectified by strengthening and amending relevant policy wording in the PS LP. Historic England consider that most of their comments can be addressed by changes to wording in the plan.
- Parish/Town Council comments – Most responding Councils are objecting to development allocations in their areas including South Woodham Ferrers, Writtle, Sandon and Great Baddow. In addition, Parish Councils that adjoin or are close to the City Council's area which include Stow Maries, Burnham and Felsted are also raising objections. Key concerns echo those in public comments described above e.g. traffic, flood risk, landscape impact and lack of infrastructure.
- Essex County Council comments – broad support for Pre-Submission Local Plan with only minor changes proposed to a small number of policies.
- Highways England comments – offer neither support or objection to particular development site proposals. Do support the new highway infrastructure identified in the PS LP e.g. Chelmsford NE Bypass, new Rail Station. Also consider that the traffic modelling evidence base is sound.
- Utility Company comments – Anglian Water are seeking minor policy wording changes and for the Chelmer Village waste treatment works to be removed from the Green Wedge. Essex & Suffolk Water make no comments on the PS LP policies but seek deletion of the open space designation on their site in West Hanningfield.

- Education Providers comments – Anglia Ruskin University support the education establishments policy which makes specific reference to the University. Writtle University College is seeking two changes to enable some of its land to come forward for housing development in the Green Belt.
- Developer/Site Promoter comments – Broad support from developers/site promoters of allocated sites, although some changes sought to policy requirements and housing numbers in particular seeking to make housing numbers a minimum. Essex Police have confirmed they will not now be re-locating from their Policy HQ in Springfield. Objections received from many omission site promoters including substantial objections from the promoters of Hammonds Farm (East of A12 Chelmsford Bypass). This challenges the Pre-Submission Local Plan evidence base including the Sustainability Appraisal and landscape assessments, the delivery of North East Chelmsford and raises key issues with allocations in Great Leighs, Broomfield and North of South Woodham Ferrers.

5 Commentary on Main Issues

General

- 5.1 Officers considered that the proposed general approach to accommodating development growth through the Spatial Principles and Spatial Strategy set out within the Pre-Submission Local Plan is sound and represents the most appropriate strategy. Representations objecting to the general approach tend to come from those promoting sites within the Green Belt, Green Wedge/Corridor or from the public objecting to sites allocated in the Pre-Submission Local Plan.
- 5.2 Within the wider context, the need for the timely delivery of infrastructure is a recurring theme of the representations received. The Local Plan policies set out the infrastructure that is required to support and mitigate the impact of development and provides the mechanisms to deliver them. This is supported by an 'living' Infrastructure Delivery Plan (IDP) which has recently been updated see Appendix 5. Essex County Council, working in partnership with the City Council has been successful in the recent Housing Infrastructure Fund (HIF) bid for the two largest elements of strategic infrastructure: Chelmsford North East Bypass and Beulieu Rail Station. Chelmsford also has an adopted and well-established Community Infrastructure Levy (CIL) regime which has and will continue to secure significant infrastructure funding to the infrastructure priorities.

Procedural and Legal Compliance

- 5.3 Officers and the Council's relevant consultants consider that the necessary procedural and legal processes have been undertaken throughout the preparation of the Local Plan. With regard to the proposed development at Hammonds Farm, which has not been allocated in the Local Plan (regarded as an omission site), it is the Officers position that the site has been tested through the Sustainability Appraisal/Strategic Environmental Assessment in the same manner as all other sites as a 'reasonable alternative'. There has also been opportunity throughout the consultation process on the Local Plan, for representations to be received on the Council's Spatial Strategy and the decisions for not including the Hammonds Farm site.

- 5.4 With regard to Stow Maries Parish Council comments, the main focus on their representations relates to the consultation process. The Parish Council claim not to have been notified at the previous Regulation 18 stages of consultation. However, the City Council has evidence that demonstrates that e-mail notifications and paper copies were sent. The Parish Council's main concern is that these notifications were sent to a previous e-mail address of the Parish Council. The City Council holds evidence that the required notification emails were all sent to a Stow Maries Parish Council e-mail account which there was no reason to believe was not active. There was no rejection, forwarding address or closure of account notice received from the email address used. Stow Maries Parish Council has confirmed that these emails were received. Officers consider therefore that the statutory obligations regarding notifications have been fulfilled. A Legal and Procedural Compliance Statement is set out at Appendix 6 of this report

Duty to Co-operate

- 5.5 Due to the considerable work that has been undertaken by Members and Officers throughout the preparation of the Local Plan, there are no significant issues raised which affects the ability of the Council to clearly demonstrate compliance with the Duty to Co-operate. This is demonstrated in the Council's Duty to Co-operate Compliance Statement attached at Appendix 1.
- 5.6 Although, not raised as a Duty to Co-operate issue, Officers have been working with Officers of Basildon and Rochford Councils to make minor amendments to the Local Plan text with regard to highway mitigation from the site allocation at South Woodham Ferrers.
- 5.7 Draft statements of common ground have already been prepared with Natural England and Historic England. Text changes have fed into the Schedule of Additional Changes. Additional Statements of Common Ground will be prepared with relevant bodies including relevant neighbouring local planning authorities.

Soundness

- 5.8 At the Pre-Submission stage of local plan preparation any party wishing to object to the Local Plan needs to set out why they feel the plan is unsound. These should be linked to tests of soundness that are set out in Section 3 of this report. As set out in the Council's Self-Assessment of Soundness at Appendix 7 of this report, it is considered that the Pre-Submission Local Plan is positively prepared, justified, effective and consistent with national policy. As it is inevitable that situations change or new information comes to light, the Council is proposing a number of additional changes, which although do not go to the soundness of the Local Plan, provide the most up-to-date position.
- 5.9 The promoter of Strategic Site Growth Site 1b – Essex Police Headquarters has indicated through their representation to the Pre-Submission Local Plan that it is now not Essex Police's intention to vacate the headquarters site located at Kingston Crescent, Springfield. The site was allocated for 250 new homes and also a new primary school with early years provision. The representation sets out that functions and operations of the headquarters site will be consolidated on the main site which could leave opportunities for disposal of other parts of the site for potential development. As this approach would require the re-provision of the existing playing fields off-site, there is

uncertainty regarding a reconfigured site allocation to be included in the local plan.

- 5.10 As Strategic Growth Site 1b provided a site allocation to comprehensively redevelop the site and now it will not be vacated by Essex Police, Officers are recommending that Strategic Site Growth Site 1b is removed. The loss of the housing numbers will be absorbed into the existing overall buffer set out in Policy S8 of the Pre-Submission Local Plan leaving a buffer of just over 18%. As the site is located within Chelmsford's Urban Area as defined in the Local Plan where the principle of development is accepted, redevelopment of portions of the wider site may be acceptable subject compliance with all other development plan policies. To mitigate the loss of the proposed primary school site, a programme of expanding existing primary schools has been assessed by Essex County Council and will need to be implemented.
- 5.11 A number of representations have included supporting technical evidence base documents to accompany their comments. These include alternative Objectively Assessed Housing reports, traffic modelling and landscape assessments. It is the officers view that the Council's evidence base is robust and will continue to work with the consultants commissioned by the Council to rebut objections through the independent examination process. A number of updates have been undertaken to key evidence base documents to ensure that they are up-to-date.

6 Schedule of Additional Changes

- 6.1 It is considered by Officers that the Pre-Submission Local Plan is sound. However, a Schedule of Additional Changes has been prepared to submit with the local plan to provide the Inspector the most up-to-date position, to address any issues that have been raised through the latest representations received to the Pre-Submission Local Plan, issues agreed through Statements of Common Grounds and other changes to ensure clarity and consistency.
- 6.2 The Schedule of Additional Changes to the Pre-Submission Local Plan is set out at Appendix 8 of this report. A summary of the changes is set out below:

Strategic Priority 8 Creating Well Designed and Attractive Places, and Promoting Healthy Communities

- 6.3 Add text to achieve a net gain for biodiversity by providing new green spaces including high quality green infrastructure built into the designs and masterplans of new development

Vision:

- New references to protect/enhance the coast and to promote culture

Policies:

Policy S6 – Conserving and Enhancing the Natural Environment

- Adding text about the Essex Recreational Avoidance Mitigation Strategy (RAMs) project for mitigation for European designated wildlife sites, minimising the loss of the best and most versatile agricultural land, minimise light pollution on the natural environment and achieving a net gain for biodiversity by providing new green spaces.

Policy S8 – Housing and Employment Requirements and Policy S9 – The Spatial Strategy

- Housing completions and commitments numbers updated to April 2018 base date.

Site Allocations:

- Removal of Strategic Growth Site 1b Essex Police Headquarters and Sports Ground
- Add open space notation on Strategic Growth Site 1d – Former St Peters College
- Added text to strengthen the focus on the importance of the new employment elements of the allocation and protection of heritage assets within Strategic Growth Site 4 – North East Chelmsford
- Added text to Strategic Growth Site 7 – North of South Woodham Ferrers to ensure that impacts of development on highways are assessed outside the City Council's area.

Monitoring Framework

- Monitoring Framework is refined and updated

Appendices:

- Introductory text to Appendix D – Extracts from North Chelmsford Area Action Plan, updated to provide clarification.
- Development Trajectories and Monitoring updated – to reflect policies changes, comments and make more effective

6.4 In addition, a Schedule of Minor Changes has been prepared. This sets out minor typographic errors and is attached at Appendix 9.

7 Sustainability Appraisal, Strategic Environmental Assessment and Habitats Regulations Assessment (SA/SEA/HRA)

Context

- 7.1 National planning policy (Paragraphs 150/151 and 165 of the NPPF) states that local plans are key to delivering sustainable development and that they must be prepared with the objective of contributing to the achievement of sustainable development. Section 19(5) of the Planning and Compulsory Purchase Act, 2004 requires local authorities to carry out a Sustainability Appraisal (SA) of the Local Plan. Sustainability Appraisal includes a process set out in European Directive 2001/42/EC (the 'SEA Directive') called Strategic Environmental Assessment (SEA).
- 7.2 The Conservation of Habitats and Species Regulations 2010 (as amended) also requires local authorities to assess the potential impacts of land use plans on the Natura 2000 network of European protected sites to determine whether there will be any likely significant effects as a result of the plan's implementation. This process is known as Habitats Regulations Assessment (HRA).

The Pre-Submission SA/SEA and HRA

- 7.3 The Pre-Submission SA/SEA Report examines the likely significant environmental, social and economic effects of the Pre-Submission Local Plan. It followed three previous stages of consultation on the SA/SEA Report in Summer 2015 (Scoping), Winter 2015 (Issues and Options) and Spring 2017 (Preferred Options).
- 7.4 The HRA Report assesses the Pre-Submission Local Plan for its possible effects on European wildlife and habitat sites such as Special Protection Areas (SPA) and Ramsar Sites (wetland bird sites). The HRA process seeks to ensure that the final Local Plan is not likely to result in significant effects on any European sites, either alone or 'in combination' with other plans. The Pre-Submission HRA Report followed consultation with Natural England on the scope and content of the assessment in Winter 2015 and public consultation on an Initial Screening HRA in Spring 2017. The Pre-Submission SA/SEA and HRA Reports were published for consultation alongside the Pre-Submission Local Plan.

Main Issues arising from the Consultation

- 7.5 A summary of the consultation responses received and the main issues raised by respondents to the SA/SEA and HRA Reports is given in Appendix 10. This includes a commentary/response/action to the main issues raised. The main issues raised by respondents with regard to the SA/SEA Report concern:
- The treatment of reasonable alternatives to the Spatial Strategy considered as part of the SA process;
 - The findings of the appraisal of the Spatial Strategy and reasonable alternatives with specific regard to the identification of the best performing options;
 - The findings of the appraisal with regard to specific site allocations and reasonable alternatives;
 - The need to take into account information submitted by developers and mitigation in the appraisal of sites;
 - Infrastructure provision to accommodate new development;
 - The rationale provided for the selection of preferred options and rejection of alternatives;
 - The identification of further alternative sites for appraisal;
 - The overall sustainability of the Pre-Submission Local Plan.
- 7.6 The main issues raised by respondents with regard to the HRA Report concern:
- Ensuring the commitment to the Essex Recreational Disturbance Avoidance and Mitigation Strategy (Essex RAMS) is reflected in the relevant policies, rather than the supporting text;
 - Wastewater treatment capacity at Great Leighs and South Woodham Ferrers;

- The importance of areas south and east of South Woodham Ferrers for brent geese;
- Impacts to designated sites due to changes in water resources.

SA/SEA and HRA Addendums

7.7 Addendums to the Pre-Submission SA/SEA and HRA Reports (Appendices 4 and 11 to this report) have been prepared following consideration of the Additional Changes to the Pre-Submission Local Plan. The addendums should be read in conjunction with the main Pre-Submission SA/SEA and HRA Reports published in January 2018.

7.8 The SA Addendum assesses the Additional Changes to the Pre-Submission Local Plan considered to be significant against the SA objectives. The appraisal has confirmed that the conclusions of the main January 2018 SA Report remain valid in that:

“the majority of the SA objectives will experience positive effects as a result of the implementation of the policies and proposals contained in the Pre-Submission Local Plan. Whilst negative effects have also been identified against many of the SA objectives, particularly associated with proposed site allocations, the Pre-Submission Local Plan includes policies which seek to manage these effects such that significant adverse effects will be largely avoided.”

“Reasonable alternatives, in terms of development requirements, the Spatial Strategy and site allocations, have been considered as part of the SA of the Pre-Submission Local Plan and earlier plan development stages. The appraisal of these alternatives has demonstrated that, overall, the proposals of the Pre-Submission Local Plan perform similar to, or better than, the alternatives considered when assessed against the SA objectives.”

7.9 The SA Addendum identifies no additional significant adverse effects through the appraisal of the Additional Changes, and that in a number of instances, the Additional Changes are found to enhance an effect that was already identified as a significant positive effect. Taking into account the summary findings of the SA/SEA process, Officers believe that the policies and proposals of the Pre-Submission Local Plan together with the Schedule of Proposed Changes represent overall a sustainable strategy.

7.10 The HRA Addendum reviews the Additional Changes to the Pre-Submission Local Plan to ensure that the HRA conclusions remain appropriate. The HRA addendum concludes that the proposed Additional Changes do not affect the HRA conclusions outlined in the main HRA report January 2018, i.e.

- Most aspects of the plan will have no significant effects on any European sites, alone or in combination due to the absence of effect pathways, and
- Where effect pathways exist, appropriate policy-based mitigation measures have been incorporated into the plan policies to ensure that proposals coming forward under the Local Plan either avoid affecting European sites entirely (no significant effect) or will have no adverse effect on site integrity.

- 7.11 Therefore, the HRA addendum finds that an additional assessment of the Additional Changes against the Habitats Regulations is not required. Taking into account the findings of the HRA process, Officers believe that the policies and proposals of the Pre-Submission Local Plan together with the Schedule of Proposed Changes will have no adverse effect on the integrity of any European site.

8 Compliance Statements and Checklists

- 8.1 There are a number of statements and checklists that have been produced to ensure that the Local Plan complies with certain requirements. Reference has been made earlier in the report to the Duty to Co-operate Compliance Statement and the Self-Assessment of Soundness. These statements include references to Topic Papers which will be submitted as supporting information with the local Plan. For completeness, a description of all of the statements are set out below:

Legal Compliance Checklist

- 8.2 As recommended by the Planning Advisory Service (PAS), the City Council has conducted a legal compliance checklist to ensure that it has fully complied with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the National Planning Policy Framework (NPPF) when preparing the Local Plan. The checklist is an assessment of all stages of Local Plan preparation and the requirements necessary to ensure the Local Plan has been robustly prepared. The checklist concludes that the City Council has complied with its legal obligations. The checklist is set out at Appendix 6.

Soundness Self-Assessment Checklist

- 8.3 A self-assessment of soundness checklist has been prepared for the Pre-Submission Local Plan and the accompanying Policy Maps. Its purpose is for the Council to satisfy itself that the Plan is sound for submission to the Secretary of State for Examination in Public by an independent planning inspector. The checklist follows the structure template published by the Planning Advisory Service (PAS) and concludes that the Plan being submitted is sound. The checklist is given in Appendix 7.

Duty to Co-operate Compliance Statement

- 8.4 A local planning authority must demonstrate how it has complied with the duty at the independent examination of its Local Plan. The City Council has prepared a Duty to Co-operate Compliance Statement which sets out how it has complied with its legal obligations under the Duty to Co-operate. The statement has been prepared to meet the guidance in the Planning Practice Guidance (PPG) and demonstrates how the City Council has cooperated effectively with relevant prescribed bodies in developing relevant evidence and plan policies on strategic cross boundary matters that have a bearing on local plan preparation. It also sets out where further, ongoing cooperation will occur on strategic matters. The statement is given in Appendix 1.

9 Other Evidence Base

9.1 A number of updated and new key evidence base documents that have been prepared to inform and support the Pre-Submission Local Plan. These include:

- Annex to Additional Landscape Sensitivity and Capacity Assessment
- Infrastructure Delivery Plan Update
- Local Plan Viability Assessment Update
- National Described Space Standards Assessment
- Air Quality Assessment Position Statement
- Chelmsford Parking Vision Action Plan Update
- Urban Area and Defined Settlement Boundary Review Update
- Rural Employment Areas Technical Note Update
- Heritage Assessment Update NE Chelmsford

9.2 Where the evidence base updates existing assessments or reports, the original versions are all available on the Council's website at www.chelmsford.gov.uk/new-local-plan/evidence-base

9.3 New evidence base documents are outlined below. Overall, Officers are satisfied that the Pre-Submission Local Plan (together with the Schedule of Additional Changes) performs well in terms of sustainability, and is informed and supported by the findings of the evidence base. All updated evidence base documents will be given a June 2018 date to correspond to the date of submission of the local plan for independent examination.

Annex to Additional Landscape Sensitivity and Capacity Assessment

9.4 A Landscape Sensitivity and Capacity Assessment was undertaken in March 2017 (and addendum September 2017) to help to determine the most appropriate direction for future development growth and landscape policies in the new Local Plan. An extension to the assessment has been completed to assess land to the north of Burnham Road, South Woodham Ferrers. This small land parcel was originally excluded from the appraisal of land in the wider vicinity because planning permission for development had been approved. The land parcel has now been assessed for completeness. The additional site assessment is set out at Appendix 12.

9.5 The assessment results show the land parcel has capacity to accommodate development. This supports the allocation of Strategic Growth Site 7 - North of South Woodham Ferrers in the Pre-Submission Local Plan.

9.6 A further Technical Note has been prepared to set out corrections to the Landscape Sensitivity and Capacity Assessment Report (March 2017) and Addendum (September 2017) arising from observations made as part of the representations to the Pre-Submission Local Plan. Overall, this has led to modest adjustments to ratings applied to some land parcels and a revision to overall landscape capacity assessment in two instances relating to parcels at North East Chelmsford. This technical note is given in Appendix 13.

Infrastructure Delivery Plan (IDP) Update

9.7 The IDP sets out the infrastructure required to support the delivery of the Local Plan up to 2036. This covers all physical, community and green infrastructure, including but not limited to utilities, transport, schools, health and open space.

The IDP is focused on the three Local Plan growth areas (1) Central and Urban Chelmsford; (2) North Chelmsford; and (3) South and East Chelmsford, and seeks to understand when the infrastructure is needed, what it will cost and where the funding will come from. Its findings also help to inform the Viability Report and CIL Review.

- 9.8 The IDP is an evolving document that will be monitored and updated over the course of the Local Plan period and as further information and more precise costings become available. The IDP published in January 2018 has been updated to reflect the latest information on infrastructure requirements since the Pre-Submission Local Plan. The full updated report is set out at Appendix 5.

Local Plan Viability Study Update (Post IDP Viability Note)

- 9.9 The Local Plan Viability Study, including CIL Viability Review assesses the deliverability of development sites included in the new Local Plan. The Viability Study builds on the Council's existing viability work and contains new work to determine whether the delivery of the Plan overall is threatened by the requirements set out in it.
- 9.10 Viability testing is an important part of the Development Plan making process. The requirement to assess viability forms part of the NPPF, is part of the Housing and Employment Land Availability Assessment process and is a requirement of the Community Infrastructure Regulations.
- 9.11 The key tables of the study published in January 2018 have been amended to reflect the updated IDP published in May 2018. This shows that the residual values of the strategic sites are still well above the viability threshold and the Council can have confidence that the sites are deliverable. The report does highlight that the residual values for the North East Chelmsford site have fallen, but there are a range of options available to help facilitate the delivery of this site such as the use of future CIL receipts. The Post IDP Viability Note is attached at Appendix 14 to this report.

Nationally Described Space Standards Assessment

- 9.12 Evidence has been gathered to support the inclusion of the Nationally Described Space Standards (NDSS) within Policy MP4 of the Pre-Submission Local Plan. A desk-based assessment took place to compare the internal measurements of recently built dwellings to the national standards. A sample of 277 dwellings, completed within the past 3 years, was assessed. The results have indicated that just over half of the dwellings in Chelmsford fall significantly below at least one internal standard. It is considered that implementing the NDSS within Chelmsford will therefore ensure consistency across developments and maximise the quality of life for the city's residents. The NDSS assessment is attached at Appendix 15 to this report.

Air Quality Position Statement

- 9.13 The Local Plan is already supported by four evidence base documents that address air quality issues; the Air Quality Management Area Action Plan 2008, Chelmsford Air Quality Annual Status Report 2017, Air Quality Check of Local Plan allocations 2018 and the Pre-Submission Local Plan Habitats Regulations Assessment 2018. This evidence collectively shows that air quality is relatively good in Chelmsford. In addition, the strategy, policies and

proposals of the Local Plan are actively seeking more sustainable means of transport and promoting innovation such as electric car charging points at every new home.

- 9.14 As part of the wider corporate responsibilities of the Council, a full Air Quality Impact Assessment (AQIA) has been commissioned to establish a baseline air quality profile for Chelmsford City Council's administrative area. This will also model future air quality and will be used to trigger the need for any local assessment of air quality required as part of future planning applications. The assessment is expected to be complete in July 2018.
- 9.15 This technical report will provide the Council with more baseline data and projections to ensure the active management of air quality in Chelmsford. A Position Statement is set out at Appendix 16 of this report

Chelmsford Parking Vision – Action Plan Update

- 9.16 The City Council has prepared an Action Plan to the Chelmsford Parking Vision Document. This sets out a number of key objectives to ensure Chelmsford offers sufficient, high quality and appropriately located public parking. This will support the economic and community activities of the city whilst balancing a reduction in the number of car trips into the city centre to help ease congestion and to improve air quality. The Action Plan update is attached at Appendix 17 to this report.

Urban Area and Defined Settlement Boundary Review Update

- 9.17 The City Council has prepared an update to the Urban Area and Defined Settlement Boundaries Technical Note published in January 2018. The changes have been identified by the Council following consideration of representations to the Pre-Submission Local Plan and to address errors. The update is given in Appendix 18.

Rural Employment Areas Technical Note Update

- 9.18 The City Council has prepared an update to the Rural Employment Areas Technical Note published in January 2018. The changes have been identified by the Council following consideration of representations to the Pre-Submission Local Plan, to provide clarity and updated information. The update is given in Appendix 19.

Heritage Assessment Technical Note Addendum

- 9.19 A Heritage Assessment was published in January 2018 to provide a comprehensive assessment of the setting of designated and built undesignated heritage assets in the vicinity of development sites under consideration. Following engagement with stakeholders this addendum has been prepared to provide further assessment in relation to planned development at North East Chelmsford. This specifically relates to concerns raised by Historic England in their responses to the pre-Submission Local Plan regarding evidence assessing the potential cumulative impacts on the setting of New Hall. The note should be read in conjunction with the Heritage Technical Note (March 2017).

- 9.20 The addendum concludes that further development anticipated in the North-East Chelmsford allocation would have no significant impact on the setting of New Hall or its Registered Park and Garden due to the previous development currently under construction. Taken cumulatively there would be no additional harm. The addendum is given in Appendix 20.

Topic Papers

- 9.21 The City Council have prepared a series of topic papers which sets out and summarises how the Council has prepared its Local Plan. The intention of the topic papers is to provide background information; they do not contain any policies, proposals, additional evidence or site allocations. An updated Topic Paper 1 which deals with the Spatial Strategy and Sites is attached at Appendix 21 of this report. The subject area of the remainder of the topic papers are set out below. All the topic papers will be submitted as supporting documents with the Local Plan Submission Documents.

Topic Paper 1 – Spatial Strategy and Sites Topic Paper Update May 2018

- 9.22 This sets out how the Council has developed the Spatial Strategy and selected the site allocations within the Pre-Submission Local Plan. It explains how these key aspects of the Local Plan have developed and the information, evidence and feedback that has informed the choices made. It also sets out reasons for the rejection of reasonable alternatives.
- 9.23 This topic paper was published alongside the Pre-Submission Local Plan consultation. The update follows a review of the consultation responses and 2018 Strategic Land Availability Assessment (SLAA) call for sites submissions, updated evidence base and new information. The update is given in Appendix 21 of this report.

Topic Paper 2 – Infrastructure January 2018

- 9.24 This sets out how the City Council has developed the key infrastructure policies and proposals within the Pre-Submission Local Plan. It explains how infrastructure requirements within the Local Plan have developed and the information, evidence and feedback that has informed the choices made.
- 9.25 This topic paper was first published alongside the Pre-Submission Local Plan consultation. An update will be prepared to accompany the submission of the Local Plan. This will consider updated information including a review of the Pre-Submission Local Plan consultation responses and updated IDP, May 2018.

Topic Paper – SA/SEA and HRA

- 9.26 This topic paper will consider how the SA/SEA and HRA processes have been considered when developing Local Plan and influenced its development. It will also set out how the Local Plan will deliver sustainable development and is the most appropriate strategy when considered against the reasonable alternatives.

Topic Paper – Transport

- 9.27 This topic paper will set out the process and evidence the Council has used to assess the transport impacts of development in the Local Plan and proposed mitigation measures. This will include details on the strategic traffic modelling.

Topic Paper – Evidence Base

- 9.28 This topic paper will provide a high-level summary of each of the key supporting studies that have been prepared as part of the evidence base to inform the new Chelmsford Local Plan.

Topic Paper – Historic Environment

- 9.29 This topic paper will set out a definition of heritage assets, national planning policy covering heritage issues, evidence on the historic environment, and how the Local Plan will ensure that the historic environment is protected and enhanced.

Topic Paper – Natural Environment and Green Belt

- 9.30 This topic paper will cover the natural environment and how the role of the countryside, landscape, biodiversity and Protected/Designated Sites, Green Infrastructure Strategy, and policies for the management of development affecting the countryside and natural environment will be provided for within the Local Plan. In addition, it will also cover the use of policy designations such as Green Belt.

10 Submission Documents

- 10.1 The documents to be submitted to the Secretary of State will include:
- Chelmsford Draft Local Plan - Pre-Submission Document (Regulation 19 – Publication Draft January 2018. This can be viewed/ downloaded from the Council's website at:
www.chelmsford.gov.uk/EasySiteWeb/GatewayLink.aspx?allId=1150502
 - Chelmsford Draft Local Plan - Pre-Submission Document (Regulation 19 – Publication Draft Policies Map January 2018
This can be viewed/ downloaded from the Council's website at:
www.chelmsford.gov.uk/EasySiteWeb/GatewayLink.aspx?allId=1150503
 - Chelmsford Draft Local Plan – Schedule of Additional Changes May 2018 – Appendix 8
 - Chelmsford Draft Local Plan – Schedule of Minor Changes May 2018 – Appendix 9
 - Chelmsford Draft Local Plan: Pre-Submission Draft Sustainability Appraisal Report January 2018. This can be viewed/ downloaded from the Council's website at:
www.chelmsford.gov.uk/EasySiteWeb/GatewayLink.aspx?allId=1143549
 - Chelmsford Draft Local Plan: Pre-Submission Draft Sustainability Appraisal Report - Addendum May 2018 - Appendix 4
 - Chelmsford Draft Local Plan: Pre-Submission Draft Habitats Regulations Assessment January 2018. This can be viewed/ downloaded from the Council's website at:
www.chelmsford.gov.uk/EasySiteWeb/GatewayLink.aspx?allId=1143551

- Chelmsford Draft Local Plan: Submission Draft Habitats Regulations Assessment Addendum May 2018 - Appendix 11
 - Regulation 22 Statement - Appendix 2
 - Copies of Regulation 20 Representations (those received to the Pre-Submission Regulation 19 consultation) which can be viewed/downloaded from: <http://consult.chelmsford.gov.uk/portal>
 - Legal Compliance Checklist Appendix 6
 - Duty to Co-operate Compliance Statement - Appendix 1
 - Chelmsford Draft Local Plan: Pre-Submission Consultation Document Sustainability Appraisal Report and Habitats Regulations Assessment Report – Feedback Report - Appendix 10
 - Topic Paper 1 - Spatial Strategy and Sites Topic Paper Update May 2018 – Appendix 21
 - Other supporting documentation
- 10.2 The Submission Documents set out above are either available through the web link identified or attached as appendices to this report.
- 11 Local Plan Examination Library
- 11.1 Officers are finalising the comprehensive Examination library and document referencing system. The Examination library will comprise the evidence base, supporting documents that were used in the production of the Local Plan and the submission documents. Every document in the Examination library will be given a unique reference before submission of the Local plan to enable the smooth running of the Examination
- 12 Conclusion
- 12.1 Following the Pre-Submission Local Plan consultation, latest updates and a review of the new and updated evidence base, a number of minor changes to improve the plan have been proposed. These are set out in Appendix 8 and 9 and will be recommended to the Inspector. It is not considered necessary to make any major changes to the draft Local Plan and it should now be used by the Council as a material consideration in the consideration of planning applications in accordance with its status as a submitted Development.
- 12.2 The Local Plan is considered to meet the test of soundness of the NPPF and the requirements of national planning policy. It is based on a robust and proportionate evidence base and supported by the final SA/SEA and HRA Reports. It provides a strong overarching framework for development in the area up to 2036 and beyond, and reflects local circumstances. Furthermore, although not a soundness test itself, the Council can demonstrate that it has effectively and proactively co-operated during the preparation of its Local Plan.
- 12.3 Work on the preparation of the Chelmsford Local Plan has now reached the stage where the City Council can submit it for Independent Examination. Officers have signed a Service Level Agreement (SLA) with the Planning Inspectorate and the formal submission of the Local Plan is programmed for 29 June 2018. It is anticipated that a Pre- Examination Meeting could take place in September with the full Examination Hearing Sessions taking place in October/November 2018. On this basis, the adoption of the Local Plan could take place early 2019. As required by the Planning Inspectorate, a Programme Officer has been appointed to provide administrative support to the inspector and ensure the efficient running of the hearing sessions.

- 12.4 In accordance with the Regulations and the Council's Statement of Community Involvement (SCI), the Council will notify the relevant contacts of the Submission of the Local Plan and publish the necessary public notices.

List of Appendices

Appendix 1	Duty to Co-operate Compliance Statement
Appendix 2	Regulation 22 Statement
Appendix 3	Local Plan Newsletter No. 4 January 2018
Appendix 4	Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Addendum
Appendix 5	Infrastructure Delivery Plan (IDP) May 2018 Update
Appendix 6	Legal Compliance Checklist
Appendix 7	Self-Assessment of Soundness Checklist
Appendix 8	Schedule of Additional Changes
Appendix 9	Schedule of Minor Changes
Appendix 10	Chelmsford Draft Local Plan: Pre-Submission Consultation Document Sustainability Appraisal Report and Habitats Regulations Assessment Report – Feedback Report
Appendix 11	Habitats Regulations Assessment (HRA) Addendum
Appendix 12	Technical Annex to the Landscape Sensitivity Capacity Report - Land at South Woodham Ferrers
Appendix 13	Annex to Additional Landscape Sensitivity and Capacity Assessment: Corrections to Summary Tables
Appendix 14	Post IDP Note May 2018
Appendix 15	Nationally Described Space Standards Assessment
Appendix 16	Air Quality Position Statement
Appendix 17	Chelmsford Parking Vision – Action Plan Update
Appendix 18	Urban Areas and Defined Settlement Boundary Review Technical Update
Appendix 19	Rural Employment Areas Technical Note Update
Appendix 20	Heritage Assessments Technical Note Addendum May 2018
Appendix 21	Topic Paper 1 - Spatial Strategy and Sites Topic Paper Update May 2018

Background Papers

- Development Policy Committee Agendas and Minutes (including Agenda Items 6 held on 13 July 2017, 28 September 2017 and 18 January 2018)
- National Planning Policy Framework (NPPF), March 2012
- Planning Practice Guidance (PPG)
- Housing White Paper, February 2017, Department for Communities and Local Government
- Planning for the right homes in the right places: consultation proposals, September 2017, Department for Communities and Local Government
- Draft revised National Planning Policy Framework consultation, March 2018
- Local Plan Issues & Options Consultation Document and Feedback Report and You Said We Did Report
- Local Plan Issues and Options Sustainability Appraisal Report and Habitats Regulations Assessment: Initial Scoping and Feedback Report
- Local Plan Preferred Options Consultation Document and Feedback Report

- Local Plan Preferred Options Sustainability Appraisal Report and Habitats Regulations Assessment Reports
- Local Plan Pre-Submission Local Plan
- Local Plan Pre-Submission Sustainability Appraisal Report and Habitats Regulations Assessment Reports
- Local Plan Evidence Base <https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-new-local-plan/new-local-plan/evidence-base/>
- The Town and Country Planning (Local Planning) (England) Regulations 2012