



Chelmsford Local Plan

**Preferred Options  
Consultation Document  
You Said We Did  
Feedback Report**

February 2025

*Our Planning Strategy 2022 to 2041*

**Chelmsford**  
Local Plan 

# **PREFERRED OPTIONS YOU SAID WE DID**

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## Abbreviations

|        |  |
|--------|--|
| BNG    | Biodiversity Net Gain  |
| CCC    | Chelmsford City Council                                      |
| CIL    | Community Infrastructure Levy                                |
| CNG    | Compressed Natural Gas                                       |
| CLT    | Community Land Trust   |
| DSB    | Defined Settlement Boundary                                  |
| ECC    | Essex County Council   |
| EDG    | Essex Design Guide   |
| EPOA   | Essex Planning Officers Association                          |
| ESP    | Employment and Skills Plan                                   |
| EqIA   | Equality Impact Assessment                                   |
| EV     | Electric Vehicle   |
| GI     | Green Infrastructure   |
| GTAA   | Gypsy and Traveller Accommodation Assessment                 |
| HAR    | Heritage At Risk   |
| HIA    | Health Impact Assessment                                     |
| HMO    | House in Multiple Occupation                                 |
| IDP    | Infrastructure Delivery Plan                                 |
| IIA    | Integrated Impact Assessment                                 |
| IWM    | Integrated Water Management                                  |
| LCWIP  | Local Walking and Cycling Infrastructure Plan                |
| LNR    | Local Nature Reserve   |
| LNRS   | Local Nature Recovery Strategy                               |
| LPA    | Local Planning Authority                                     |
| LTP    | Local Transport Plan   |
| MMO    | Marine Management Organisation                               |
| NCN    | National Cycle Network                                       |
| NNR    | National Nature Reserve                                      |
| NPPF   | National Planning Policy Framework                           |
| PPG    | Planning Practice Guidance                                   |
| SANG   | Suitable Alternative Natural Greenspace                      |
| SFRA   | Strategic Flood Risk Assessment                              |
| SGS    | Strategic Growth Site  |
| SME    | Small and Medium Sizes Enterprises                           |
| SHELAA | Strategy Housing and Employment Land Availability Assessment |
| SHMA   | Strategic Housing Market Assessment                          |
| SHNA   | Strategic Housing Needs Assessment                           |
| SPA    | Special Policy Area  |
| SRA    | Specialist Residential Accommodation                         |
| SPD    | Supplementary Planning Document                              |
| SSSI   | Site of Special Scientific Interest                          |
| TCPA   | Town and Country Planning Association                        |
| UAB    | Urban Area Boundary  |

## **Executive Summary**

This report sets out:

- Summary of the Preferred Options consultation (Section 1)
- Summary of representations received (Section 2)
- Summary of how the Chelmsford Local Plan Pre-Submission (Regulation 19) Document (shortened to 'Pre-Submission Local Plan' throughout the rest of this document) has been informed by more recent evidence base studies (Section 3)
- The main issues raised in the representations received and a high-level summary of CCC's response to the comments made and how they have informed the Pre-Submission Local Plan (Section 4).

It supersedes the Preferred Options Feedback Report published in October 2024.

The Preferred Options Consultation Document set out the preferred spatial strategy for new homes and jobs for the future growth and development of the city up to 2041. It also contained updated and new policies which would be used to determine planning applications.

### **About the Consultation**

A comprehensive six-week programme of consultation took place during the formal consultation period from 10am on Wednesday 8th May 2024 to 4pm on Wednesday 19th June 2024. The consultation was promoted through a range of activities including email/letter notifications to more than 2,800 contacts registered on the Council's Consultation Portal, on the Council's website, press releases, adverts in local publications and social media. Consultation activities included placing consultation documents on deposit at the Council's Customer Service Centre, organised stakeholder presentations, Duty to Co-operate meetings, a virtual exhibition and staffed physical exhibitions.

### **Summary of responses to the Preferred Options Local Plan**

A total of 10,418 comments were received to the consultation from 3,678 respondents. The respondents are from a wide variety of groups and individuals including residents, developers, landowners and their agents, businesses and statutory bodies such as other local authorities and Parish/Town Councils. All the comments received can be viewed on the Council's Consultation Portal.

An overview of the key issues raised to the draft plan is provided below.

Overall:

- A wide range of feedback was received ranging from general comments to technical observations on detailed policy wording
- New policies, policies proposed for more substantive changes, and some new land allocations for development attracted the greatest level of comments
- Some policies of the plan did not attract any comments

- Most Government or national bodies either support the plan outright or offer qualified support subject to some proposed amendments
- Mix of support and opposition from Town/Parish Councils, with many suggesting changes from minor amendments to the deletion of site allocations
- Most public comments were objecting to one or more aspects of the plan, though there was limited support
- Hammonds Farm and Junction 18 of the A12 (SGS16a-b) received very large numbers of public objections, with an organised campaign established by Little Baddow, Danbury, Boreham and Sandon Parish Councils coordinating responses
- Many developers/landowners support development proposed on their sites, with some seeking changes to the allocations policies and boundaries
- Many developers/landowners object where the plan did not allocate specific land or sites for development and call for Green Belt and Green Wedge reviews.

#### Strategic Priorities:

- Support for the preferred Strategic Priorities including new Strategic Priorities 1 and 2
- Some detailed wording amendments proposed including strengthening the emphasis on addressing climate change and on meeting housing needs in full
- References to some other strategies and plans are proposed including the Essex Local Nature Recovery Strategy and the Council's Plan for Improving Rivers and Waterways
- Some call for a review of the Green Belt to identify sites which may be more suitable for development and to provide a more balanced/sustainable Spatial Strategy.

#### Vision:

- Overall support for the Vision
- Requests for more explanation on how the Vision bullet points relate to the Vision and will be used in future decision making
- Some detailed wording amendments proposed to the Vision bullet points including adding references to multifunctional green/blue infrastructure and Biodiversity Net Gain
- Additional bullet points proposed including around supporting rural areas and rural tranquillity
- Some comments suggesting that Hammonds Farm is contrary to the Vision.

#### Spatial Principles:

- Good level of general support
- Some developers consider there should be a Green Belt review to identify sustainable development opportunities in this area
- Some developers call for more development to be focused on lower order settlements
- Some detailed wording amendments, and an additional principle proposed around integrating strategic green infrastructure with ecological networks and the wider landscape.

#### Strategic Policies for creating sustainable development:

- Overall support for the Strategic Policies including new policies S14 (Health and Wellbeing) and S16 (Connectivity and Travel)
- Many objections from the development industry to policy requirements which exceed national planning policy including net zero homes (Policy S2) and 20% biodiversity net gain (Policy S4)
- Concerns over the evidence base for some new policy requirements, including net zero homes (Policy S2) and Health Impact Assessments (Policy S14)
- Some detailed wording changes proposed to expand, amend, clarify and update policies
- Some additional policy requirements proposed including to assist with the delivery of biodiversity net gain and ecosystems restoration (Policy S2)
- References to some other strategies and guidance are proposed including the Chelmsford Health and Wellbeing Plan (Policy S14)
- Support for promoting sustainable travel methods but concerns are raised about how feasible and deliverable these will be in some areas
- Support for the investment and improvements to key infrastructure, although some concerns about the funding and timing of infrastructure.

#### Strategic Policies for how future development growth will be accommodated:

- Mix of support and opposition to Development Requirements (Policy S6) and the Spatial Strategy (Policy S7)
- Requests from Castle Point and Southend-on-Sea City Councils as to whether Chelmsford City Council can accommodate any of their unmet housing need
- Adjustments requested to the Settlement Hierarchy
- Some developers are calling for higher housing and employment requirements
- Some developers request a specific requirement around meeting the housing needs of older people
- Objections to some site allocations in particular, Hammonds Farm (SGS16a) and Junction 18 A12 Employment Area (SGS16b) and calls for their removal/replacement. There is also limited support for these development proposals
- Concerns that the Spatial Strategy is too reliant on larger strategic sites and that a sufficient range of reasonable alternatives approaches, and site options have not considered or appraised
- Concerns over lack of evidence for and delivery of the Gypsy and Travellers and Travelling Showpeople requirements
- Broad support from the promoters of allocated sites with some requesting higher development capacities and larger site areas
- Many developers propose alternative development land and sites including within the Green Belt and Green Wedge
- Calls for the expansion of the North-East Chelmsford Garden Community site and clarity sought over why this option is rejected

- Broad support for other Strategic Policies including Delivering Economic Growth (Policy 8) and Connectivity and Travel (Policy S16)
- Concerns over existing infrastructure capacity constraints and the delivery of new infrastructure including transport, education and healthcare
- Some detailed wording changes proposed to expand, amend, clarify and update policies
- Some additional policy requirements proposed including supporting regional growth sector priorities (Policy S8)
- References to some other strategies, guidance and projects proposed including Thames Freeport (in Policy S9).

#### Site allocation policies for new development growth:

- Support expressed for many proposed site allocation policies
- Support for site allocations and development on brownfield land, but public opposition to removal of car parks to allow for development in Chelmsford Urban Area
- Significant levels of opposition to Hammonds Farm (SGS16a) and Junction 18 A12 Employment Area (SGS16b) for multiple reasons including traffic, landscape, flood risk and heritage impacts, with calls for their removal. There is also some limited support for these development proposals
- High level of objections to some other site allocations in particular Waltham Road Employment Area (GS9a), Land at Kingsgate, Bicknacre (GS11b) and Land West of Barbrook Way, Bicknacre (GS11c) for multiple reasons including traffic, landscape and flood risk impacts and calls for their removal
- Some detailed wording changes proposed to expand, amend, clarify and update site policies including in relation to active travel, green infrastructure, waste water, heritage and flood risk
- Broad support from the promoters of allocated sites with some requesting higher development capacities and larger site areas
- Many developers propose alternative development land and sites including within the Green Belt and Green Wedge
- Concerns over existing infrastructure capacity constraints and the delivery of new infrastructure including transport, education and healthcare
- Calls for changes to masterplans requirements for strategic sites and Special Policy Areas
- Requests for policy and boundary changes to some Special Policy Areas including ARU Writtle.

#### Development Management Policies:

- Broad support for many policies including biodiversity net gain (in Policy DM16) and net zero homes (in Policy DM31)
- Opposition from the development industry to some new policies and/or requirements including housing policies DM1 and DM2, sustainable buildings DM25 and DM16 and DM31
- Requests for clarifications, more detail, greater justification for and wording changes to many policies
- Essex County Council and Anglian Water Services recommend a more ambitious water efficiency standard in sustainable buildings (DM25)

- Some developers are seeking a more flexible approach to development within the Green Belt and Green Wedge
- Concerns over the evidence base to justify some new policy requirements, and how they will affect development viability and delivery including net zero homes (Policy DM31)
- Three new plan policies suggested – one from Natural England to address the cumulative increased recreational pressure on SSSIs and two from Essex County Council to mitigate overheating risk in new development, and to address embodied carbon emissions from new development.

#### Monitoring Framework:

- Some suggested additional monitoring indicators relating to Health Impact Assessments.

#### Policies Map:

- Suggested changes to some notations and designations including settlement boundaries, the Green Wedge and the Hammonds Farm site (SGS16a).

#### Consultation:

- Some criticism regarding the length of the consultation period and the process for making comments using the online portal.

### **How the comments have been used**

The 'CCC response to the comments made' tables provide a high-level response to the main issues raised within the comments, explaining how they have been considered. A high-level overview of the main changes made to the plan in response to the preferred options consultation responses is provided below:

- Minor changes have been made to the Strategic Priorities, Vision and Spatial Principles
- Most Strategic Policies have been subject to limited changes – policies which have been subject to more substantive changes include S4, S9, S6 and S7
- Site allocation changes including the deletion of Kay Metzeler site, Brook Street (Site 1x) which is longer available for housing development, the deletion of Land west of 20 Back Lane, Ford End (Site 14a) as it is no longer considered suitable, the allocation of a new housing site at Andrews Place, West of Rainsford Lane (Site 1cc) which is being activity promoted for redevelopment in the plan period, and increasing the capacity of Meadows Shopping Centre allocation (Site 1w) in line with the recent submitted planning application and the assessment of representations submitted by the applicant
- Updated site allocation policies including new requirements, amended requirements and some deleted requirements
- Most Development Management Policies have been subject to limited changes – policies which have been subject to more substantive changes include DM1, DM2 and DM25
- Limited changes to the Draft Policies Map



- An updated and expanded glossary.

In addition to the preferred options comments, the Pre-Submission Local Plan has also been updated to:

- Provide greater clarification and consistency
- Respond to more recent discussions with Duty to Cooperate bodies about their Preferred Options responses and any changes sought
- Respond to more recent discussions with infrastructure providers about their services, such as education and healthcare
- Reflect the outputs of new evidence studies including an updated Infrastructure Delivery Plan, Strategic Housing Needs Assessment Addendum Report, Archaeology Assessment, Open Space Study Local Wildlife Sites Review
- Reflect more recent information and updates including the 2024 Annual Monitoring Report, April 2024 housing land supply data and the latest planning status of allocated sites
- Respond to more recent discussions with promoters about their sites identified in the Preferred Options Consultation Document
- Improve its effectiveness for decision making following feedback from Development Management colleagues, and
- Have regard to the housing numbers and transitional arrangements for the progression of Local Plans at an advanced stage of preparation set out in the revised NPPF December 2024.

## **Introduction**

The Preferred Options consultation represented the second formal stage in the preparation of the Review of the Adopted Chelmsford Local Plan. The consultation document set out the preferred spatial strategy for new homes and jobs for the future growth and development of the city up to 2041. It also contained updated and new policies which would be used to determine planning applications. The consultation was undertaken in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

This consultation was preceded by an Issues and Options consultation carried out in 2022 and also undertaken in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

## **Purpose of this ‘You Said We Did’ Report**

This report sets out the consultation feedback received on the Preferred Options Consultation Document from a wide variety groups and individuals including residents, developers, landowners and their agents, businesses and statutory bodies such as other local authorities and Parish/Town Councils.

This report is constructed in four parts:

- Section 1 provides a summary of the public and stakeholder consultation undertaken
- Section 2 gives a summary of the representations received
- Section 3 provides a summary of how the Chelmsford Local Plan Pre-Submission (Regulation 19) Document (shortened to ‘Pre-Submission Local Plan’ throughout the rest of this document) has been informed by more recent evidence base studies (Section 3)
- Section 4 provides a summary of the main issues raised in the responses received and summary of how the Pre-Submission Local Plan has been informed by the responses. The report is set out in document order and therefore the policy numbers may not be in sequence.

This report supersedes the Preferred Options Feedback Report published in October 2024.

## Section 1: Summary of Consultation Undertaken

A comprehensive six-week programme of consultation took place during the formal consultation period from 10am on Wednesday 8<sup>th</sup> May 2024 to 4pm on Wednesday 19<sup>th</sup> June 2024.

This programme of consultation followed (and exceeded) the requirements set out in legislation, and the commitments in the Council's adopted Statement of Community Involvement (September 2020).

The package of documents published on 8 May comprised:

- Preferred Options Local Plan Consultation Document; and
- Preferred Options Integrated Impact Assessment (subject of a separate Feedback Report); and
- Consultation Statement outlining full details about the consultation process.

This package of documents was placed on deposit at CCC Customer Service Centre, with electronic versions available to view at most Parish/Town Council offices and local libraries across Chelmsford.

The Council notified more than 2,800 contacts registered on its Consultation Portal. These included public, statutory agencies such as Essex County Council and Town/Parish Councils, utility companies, businesses, interest groups, and voluntary and community bodies. Council Members and staff were also notified.

A number of consultation events were arranged:

- Six staffed exhibitions, visited by 111 attendees
- 14 days of unstaffed exhibitions
- Four pop-up displays for the whole consultation period
- A bespoke Local Plan video, attracting 885 views
- An online virtual exhibition, visited by more than 455 views
- Officers also held targeted engagement including a Parish/Town Council Forum, Agent/Developers Forum and Local Authority Duty to Co-operate meeting.

Printed/online materials and advertisements were produced as follows:

- Web page with links to key materials including a Preferred Options Local Plan Tracked Changes May 2024 and the exhibition panels
- Advertisements in a local newspaper (Essex Chronicle)
- Six articles in City Life (CCC's online news website) and two in South Woodham Focus (independent community magazine)
- 24 social media posts
- Posters distributed to Parish/Town Councils, CCC offices and leisure facilities, post offices, doctors' surgeries, churches and local shops
- Summary newsletters widely available, in addition to being handed out at South Woodham Ferrers railway station
- 89 site notices placed around new potential site allocations
- Three GovDelivery mailshots to 12,000 recipients.

A list of organisations consulted, and copies of key consultation materials are given in Appendix 1.

### **Integrated Impact Assessment of the review of the Adopted Local Plan: Preferred Options Consultation**

The Local Plan Integrated Impact Assessment (IIA) was also subject to consultation at the same time. The IIA brings various strands of assessment together, consisting of the Sustainability Appraisal, Strategic Environmental Assessment, Habitats Regulations Assessment, Health Impact Assessment, and Equalities Impact Assessment. Feedback on this document is summarised in a separate report prepared by the Council's IIA Consultants.

### **Call for Sites and SHELAA**

In addition to the Local Plan and IIA consultations, the Council undertook a Call for Sites to identify available land for consideration for future development. Nine new submissions and nine amendments to existing sites were submitted through this process. All the sites have been assessed in the Strategy Housing and Employment Land Availability Assessment (SHELAA) Autumn 2024 Report.

## **Section 2: Summary of Representations**

For this report, people and organisations who made a comment to the consultation are called 'respondents'.

### **Methodology**

Respondents had a choice of ways to make their comments, by:

- Answering questions included in a complete version of the consultation document published on the consultation portal
- Answering questions using a stand-alone online questionnaire published on the consultation portal
- Sending written comments in an e-mail
- Sending written comments by post.

The questionnaire mostly consisted of a main question with related questions seeking views and any information the Council may have missed, plus two monitoring questions.

Whichever method respondents used, all comments have been entered into the Council's Consultation Portal. Where respondents did not state which paragraph/section/policy or site they were commenting on, officers have assigned responses to the most relevant part of the Local Plan, with miscellaneous responses being recorded against the Foreword.

Where a Yes/No preference was invited to a question (for example, 'Do you agree with this section/policy/paragraph/table/figure?' and 'Are you a resident within the Chelmsford City Council area?'), these have been recorded only where the respondent stated their preference.

The questions for both online methods of response were identical and have been combined for this report.

A small number of representations were received after the consultation closed, by prior agreement with officers, these have been analysed and included in the figures in this report. In addition, a small number of representations were 'inadmissible' due to their content. In these cases, as far as possible, the main point of the representation has been recorded minus the offending remarks.

To ensure proper consideration of issues, respondents have been divided into types depending on their interface with the Council. Some fall into more than one category, so totals may exceed the overall number of respondents.

Similarly, some respondents made their comments via more than one method so the totals for how comments were made is greater than the total number of comments received.

The assessment of responses is high level and focuses on the main issues raised, rather than the number of representations to any individual question.

### **Overview of responses**

A total of 10,418 comments were received to the consultation from 3,678 respondents.

These respondents are from a wide variety groups and individuals including residents, developers, landowners and their agents, businesses and statutory bodies such as other local authorities and Parish/Town Councils.

It should be noted that the numbers included under the 'Key statistics' sections in this feedback report, and the number of responses received to each question will not amount to the totals set out above as people did not have to answer every question.

Comments by respondent type:

| Type of Respondent              | Explanation   | Number of Respondents |
|---------------------------------|---|-----------------------|
| Duty to Co-operate (DTC) bodies | Key bodies consulted on strategic matters, including Essex County Council, adjoining local authorities, Historic England, Natural England, Environment Agency | 17                    |
| Specific bodies/groups          | Parish/Town Councils, utility bodies, health and transport consultees etc   | 40                    |
| General and Other bodies/groups | Voluntary groups, religious groups, housing providers, businesses etc   | 27                    |
| Developers/landowners           | Landowners, promoters of land and their agents  | 99                    |
| Public                          | Individual members of the public  | 3495                  |

**How people made their comments:**

| Method of making comments  | Number of Comments | Percentage |
|----------------------------|--------------------|------------|
| Online Consultation Portal | 410                | 3.9%       |
| E-mail                     | 9877               | 94.8%      |
| Letter                     | 131                | 1.3%       |

A large number of representations were received by email from 'Say no to Hammonds Farm' - a coalition of Councillors from Boreham, Sandon, Danbury and Little Baddow Parish Councils, expressing opposition to new development at Strategic Growth Sites 16a Chelmsford East Garden Community and 16b Land Adjacent to A12 Junction 18 Employment Area.

All the comments received can be viewed in full on the Council's [planning policy consultation portal](#).

When viewing the portal, you will see the list of recent consultation events. Events which are open for consultation show a green timeline and the word 'open'. Those which are closed show a red timeline and the word 'closed'.

To view comments, you need to:

- Choose the event you would like to view comments for
- Select 'learn more' to open the event page
- Click on the 'what people say' tab to display a list of all the comments.

You can read all comments, or sort by name or date we received them. Where additional information such as reports or maps were submitted with a comment, these are listed at the end of the comment in PDF format and can be viewed or downloaded.

Responses to Preferred Options consultation included in the complete version of the full document are prefixed PO24. Responses to the stand-alone questionnaire are prefixed POQ24. You can find out more about using the consultation portal in our [guidance notes](#).

## Monitoring Questions

Two optional monitoring questions were included in the consultation. This was to help us understand the reach of the consultation and inform future engagement activities.

| Optional Monitoring Question                                     | Number of Responses | Yes | No |
|--|---------------------|-----|----|
| OM1. Are you a resident within the Chelmsford City Council area? | 193                 | 104 | 89 |

| If you answered yes, please select the settlement which you live in or near to: | Number of Reps |
|---|----------------|
| Bicknacre   | 23             |
| Boreham   | 0              |
| Broomfield  | 1              |
| Chatham Green   | 0              |
| Chelmsford Urban Area   | 7              |
| Danbury   | 8              |
| Downham   | 0              |
| East Hanningfield   | 20             |
| Edney Common  | 0              |
| Ford End  | 15             |
| Galleywood  | 0              |
| Good Easter   | 0              |
| Great Baddow  | 0              |
| Great Leighs  | 3              |
| Great Waltham   | 1              |
| Highwood  | 0              |
| Howe Green  | 0              |
| Howe Street   | 0              |

|                       |    |
|-----------------------|----|
| Little Baddow         | 3  |
| Little Waltham        | 0  |
| Margaretting          | 0  |
| Ramsden Heath         | 0  |
| Rettendon Common      | 0  |
| Rettendon Place       | 0  |
| Roxwell               | 0  |
| Runwell               | 0  |
| Sandon                | 2  |
| South Woodham Ferrers | 3  |
| Stock                 | 0  |
| West Hanningfield     | 0  |
| Woodham Ferrers       | 0  |
| Writtle               | 0  |
| Other                 | 12 |

| <b>Optional Monitoring Question OM2 How did you hear about the consultation?</b> | <b>Percentage</b> |
|--|-------------------|
| Direct notifications email/letter  | 59.3%             |
| Chelmsford City Council website  | 27.1%             |
| Social media   | 10.9%             |
| Local Plan newsletter  | 4.5%              |
| Parish Council website/newsletter  | 9.5%              |
| Newspaper advert   | 0.5%              |
| Poster   | 9.5%              |
| Attended a Local Plan exhibition   | 1.8%              |
| Word of mouth  | 8.6%              |
| Other  | 1.4%              |

Note: The percentage total exceeds 100% as respondents were able to select more than one answer.



### Section 3: How the evidence base has informed the Pre-Submission Local Plan

As well as comments to the previous rounds of consultation in 2022 and 2024, the Pre-Submission takes account of recently completed evidence base documents across a wide range of issues. These documents are summarised in the table below:

| Document  | Purpose   | How it has informed the Pre-Submission Local Plan  |
|---|---|--|
| Updated Viability Assessment 2024                       | Considers the cost and value changes since the 2023 Viability Update was conducted, proposed changes to the NPPF and Pre-Submission policy amendments, as well as the Preferred Options Infrastructure Delivery Plan costs to developers for strategic sites on viability, and whether it is necessary to fully update the viability evidence before submitting the Local Plan for examination. | The impact of changes in costs and values on the preferred set of policies in the Pre-Submission Local Plan documents, including sensitivity testing, are broadly like those presented in the 2023 Local Plan Viability Update. Review mechanism text included in Policy DM2 to take account of sensitivities to changes in costs and values over the plan period.   |
| Strategic Housing Needs Assessment Addendum Report 2024 | Partially updates the 2023 Strategic Housing Needs Assessment (SHNA) to review the implications of moving from housing delivery up to a figure of 1,206 dwellings per annum over the plan period. Whilst updating the analysis for a new housing number, the report also updates other aspects of the SHNA where new data exists.   | Increased affordable housing need has been reported in Policy DM2 and resultant clarification on the requirements for affordable private rent dwellings added. Findings on the demand for discounted market housing updated in the Reasoned Justification for Policy DM2. Updated demand for Specialist Residential Accommodation for older people supporting new requirement for older persons market housing on greenfield sites of more than 500 dwellings in Policy DM1. |
| Preferred Options Infrastructure Delivery Plan 2024     | Sets out the infrastructure requirements of the Spatial Strategy incorporating findings from the Stage 1 baseline infrastructure  | Estimate costs have been incorporated in the Updated Viability Assessment where appropriate. Infrastructure requirements have been aligned with sites specific policy requirements.  |

| Document   | Purpose   | How it has informed the Pre-Submission Local Plan  |
|--|---|--|
|  | capacity analysis and providing further analysis showing planned projects across the administrative area of the Council. Appendix A and B record all identified project requirements, including the infrastructure type, location, delivery mechanism, cost, and funding gap based on the Preferred Spatial Strategy. |  |
| Strategic Housing and Employment Land Availability Assessment (SHELAA) Autumn 2024 | Provides a high-level assessment of promoted sites using criteria developed from National and Local Plan policy.  | The assessment enables Officers to identify site characteristics, highlight site strengths and potential constraints, and establish likelihood of developability or deliverability of promoted sites. It does not allocate sites for development but is a starting point for reviewing sites against the promoted Spatial Strategy alongside other evidence base documents/considerations.                       |
| Gypsy and Traveller Accommodation Assessment (GTAA) 2024                           | Provides an assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in Chelmsford City Council area.   | The assessment, together with other evidence base documents, informs the allocation of Pitches and Plots for Gypsy and Travellers that meet the definition of Gypsies and Travellers used in the Planning Policy for Travellers Sites in Strategic Policy S6. It also informs the criteria-based considerations in Policy DM3 and well as the approach to Specialist Residential Accommodation in Policy DM1Cii. |
| Employment Land Review – Focused Update 2024                                       | A provide updated economic evidence specifically to inform the approach to economic growth and employment   | The updated employment floorspace requirement forecasts have informed Strategic Policy S6.   |

| Document   | Purpose   | How it has informed the Pre-Submission Local Plan  |
|--|---|--|
|  | land policies within the Pre-Submission Local Plan. It draws on the most up-to-date assumptions and data regarding future economic growth prospects for Chelmsford between 2022 and 2041.   |  |
| Addendum to Heritage Assessment 2024                           | A report providing a brief assessment of the setting of designated and non-designated heritage assets within or in the vicinity of a new development site under consideration for the Pre-Submission Local Plan, i.e. Andrews Place to the west of the City Centre.   | The report identifies any designated and non-designated heritage assets within or in the vicinity of new housing site allocation Andrews Place (Growth Site Policy 1cc) and has been used to inform the site policy in the plan. |
| Updated Indoor and Outdoor Sports Assessment and Strategy 2024 | Assesses the indoor and outdoor sports provision within the City Council's area and provides a framework for the prioritisation, provision and development of sports facilities across the public, private and independent sectors. It covers all formal playing pitch and outdoor sport facilities across the authority area to strategically plan for the future. | Has been used to inform requirements relating to on and off-site sports provision in the IDP.  |
| Open Space Assessment 2024                                     | Audit of Open Space within the City Council's area to inform the provision of accessible, high quality, sustainable provision for open spaces.  | Has been used to inform and update Open Space notations on the Policies Map, as well as setting standards for Open Space requirements for new development.   |
| Air Quality Assessment 2024                                    | This provides an assessment of the air quality impact of the draft Local Plan.  | Overall, the assessment concludes that the impact of the Local Plan in 2041 can be considered negligible for all pollutants.   |

| Document   | Purpose   | How it has informed the Pre-Submission Local Plan   |
|--|---|---|
| Archaeology Assessment 2024  | A high-level assessment of archaeological impact of the proposed new site allocations. The report defines the heritage significance of (archaeological) designated and non-designated heritage assets which may be impacted by development proposals.   | The report identifies where specific archaeological work is required for future planning applications and where archaeological work may be required pre or post determination. The conclusions of the report have informed relevant Local Plan policies including Policy S3 and Policy DM15. In addition, where mitigation measures are identified this has informed relevant site allocation policies such as Growth Site Policy 9a, Strategic Growth Site Policy 16a and Strategic Growth Site 16b. |
| Local Wildlife Sites Review 2024   | A review of designated Local Wildlife Sites (LOWS) in the vicinity of proposed new site allocations forming part of the Local Plan Review.  | The study supports LOWS defined on the Draft Policies. The changes include some new LOWS, deleted LOWS and amendments to LOWS boundaries.   |
| Strategic Flood Risk Assessment (SFRA) Level 2 – new and updated Site Summary Tables and mapping | The SFRA provides a comprehensive and robust evidence based on flood risk issues to support the plan review. It assesses land promoted for potential development, changes to the proposed development sites within the city, and changes in national planning policy and guidance. It also builds on identified risks from the Level 1 assessment for proposed development sites, to provide a greater understanding of fluvial, surface water, groundwater, and reservoir related flooding | The new and updated information has been used to inform decisions on the location of future development and flood risk policies, reflecting the implications of the August 2022 changes to the Planning Practice Guidance. They have also informed site allocation boundaries on the Policies Map for the Pre-Submission Local Plan and the Sequential and Exception Test Focused Update (see below).   |

| Document   | Purpose   | How it has informed the Pre-Submission Local Plan  |
|--|---|--|
|  | risks for sites most at risk.   |  |
| Sequential and Exception Test Focused Update, 2024   | The report provides updates to the Flood Sequential and Exception tests undertaken to inform the Pre-Submission Local Plan. It should be read alongside the report CC012: Sequential and Exception Tests of Preferred Options Site Allocations, May 2024. | The focused update has been used to inform decisions on the location of future development and flood risk implications which may need to be considered during development of the site. These updates reflect the updates made through the Level 2 SFRA and includes updates to the site allocations for Growth Sites 17a, SGS1cc and SGS16a. |
| Small Sites Planning Briefs/Concept Frameworks, 2024 | This document details the constraints and opportunities of the five new small housing sites allocated in Ford End, Bicknacre and East Hanningfield.   | The report supports and informs the site allocation policies (Growth Sites 11b, 11c, 14b, 17a and 17b) and identifies suitable site boundaries shown on the Draft Policies Map.  |
| Preferred Options IIA, 2024                          | The IIA is a detailed technical document, which assessed the Preferred Options Local Plan proposals and policies against a set of assessment objectives to  | The Preferred Options IIA includes recommendations which have been considered as part of the Pre-Submission plan. This includes amendments to policies S2, S4 and DM15.  |

| Document   | Purpose  | How it has informed the Pre-Submission Local Plan  |
|--|--|--|
|  | identify any significant effects and recommend measures to mitigate these effects and enhance the positive effects.  |  |
| Pre-Submission IIA, 2024   | The IIA is an iterative process, which has assessed the Pre-Submission Local Plan proposals and policies against the same assessment objectives as the Preferred Options version, to identify any further significant effects and recommend measures to mitigate these effects and enhance the positive effects. | The Pre-Submission IIA includes recommendations which have been considered as part of the Pre-Submission plan. This includes amendments to policies S2, S4 and DM15.   |
| Transport impact appraisal Of Local Plan Review Pre-Submission (2024)            | Assesses the impact the development proposed in the Pre-Submission Local Plan will have on the road network. This is a strategic assessment appropriate for a Local Plan.  | Concludes that by maximising the potential for sustainable accessibility to and from the sites along the A12 corridor, the impact on the strategic highway network should not be considered severe.  |
| Local Neighbourhood Centres 2024   | Describes the approach to defining the Local Neighbourhood Centres boundaries on the Pre-Submission Local Plan Draft Policies Map.   | Retail frontages for Local Neighbourhood Centres are currently identified on the adopted Local Plan Policies Map. There has since been a shift in national policy away from defining retail frontages. The report supports the Local Neighbourhood Centres boundaries on the Draft Policies Map. |
| Essex Open Legal Advice – Energy Policy and Building Regulations (February 2024) | Considers the ability of local planning authorities to set local plan policies that require development to achieve energy efficient standards above Building Regulations.  | Supports Local Authorities having statutory powers to set planning policies which require energy efficiency standards that are better than Building Regulations as long as these are evidenced and justified, and policies can be expressed using energy   |

| Document  | Purpose  | How it has informed the Pre-Submission Local Plan   |
|---|--|---|
|   |  | metrics if they are supported by an evidence base that justifies their viability. This supports the approach taken in Policy DM31.  |
| Essex Net Zero Policy – Technical Evidence Base (July 2023) | Provides the technical evidence to support the specific policy requirements identified to ensure that new development in Essex is built to net zero carbon in operation.                       | This evidence advances the high-level Essex Net Zero Carbon Viability and Toolkit Study (August 2022) and has informed the CCC Viability testing and demonstrates that the requirements of Policy DM31 are viable for developments within CCC. This supports the approach taken in Policy DM31. |
| Essex Net Zero Specification Guidance (July 2024)           | Provides technical information to support the delivery of Essex Net Zero development with consistent planning policy approach towards reducing carbon emissions from new development in Essex. | Supports the requirements in Policy DM31.   |

All the plan evidence base is available online via [Local Plan Review](#).

## **Section 4: Main Issues Raised in Consultation Responses and high-level summary of how they have informed the Pre-Submission Local Plan**

A brief overview of the content of each section of the consultation document is set out below. This is followed by a summary of the feedback received by section. After that, a table is provided which provides a high-level summary of CCC's response to the consultation comments made and how they have been used to inform the Pre-Submission Local Plan.

We have specified who has made comments from public sector bodies, infrastructure or service providers and developers/landowners in brackets at the end of relevant bullet points in the feedback received text. This is because it is useful to understand the nature of respondents, particularly where a stakeholder has a legal duty or responsibility over a matter that they are making comments about. We have not specified who has made comments from members of the public as to do so would result in a very long report, so bullet points from the public do not have brackets. It should be noted that in some cases, members of the public raised similar points to stakeholders. This is especially the case in relation to comments made by Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group to Strategic Growth Sites 16a (Hammonds Farm) and 16b (Junction 18 of the A12) which have been replicated and amplified by many individuals. To avoid duplication, these comments have not been repeated in the public comments. However, this does not affect the consultation process as this report focuses on the main issues received rather than the number of representations to any individual section of the plan.

The 'CCC response to the comments made' table provide a high-level summary on how the main issues raised in the responses have been used to inform the Pre-Submission Local Plan. This includes details of the key changes made and suggestions not taken forward and why.

A high-level overview of the main changes made to the plan in response to the preferred options consultation responses is provided below:

- Minor changes have been made to the Strategic Priorities, Vision and Spatial Principles
- Most Strategic Policies have been subject to limited changes – policies which have been subject to more substantive changes include S4, S9, S6 and S7
- Site allocation changes including the deletion of Kay Metzeler site, Brook Street (Site 1x) which is longer available for housing development, the deletion of Land west of 20 Back Lane, Ford End (Site 14a) as it is no longer considered suitable, the allocation of a new housing site at Andrews Place, West of Rainsford Lane (Site 1cc) which is being activity promoted for redevelopment in the plan period, and increasing the capacity of Meadows Shopping Centre allocation (Site 1w) in line with the recent submitted planning application and the assessment of representations submitted by the applicant
- Updated site allocation policies including new requirements, amended requirements and some deleted requirements



- Most Development Management Policies have been subject to limited changes – policies which have been subject to more substantive changes include DM1, DM2 and DM25
- Limited changes to the Draft Policies Map
- An updated and expanded glossary.

In addition to the preferred options comments, the Pre-Submission Local Plan has also been updated to:

- Provide greater clarification and consistency
- Respond to more recent discussions with Duty to Cooperate bodies about their Preferred Options responses and the changes sought
- Respond to more recent discussions with infrastructure providers about their services, such as education and healthcare
- Reflect the outputs of new evidence studies including an updated Infrastructure Delivery Plan, updated Strategic Housing Needs Assessment, Archaeology Assessment, Open Space Study and Local Wildlife Sites Review
- Reflect more recent information and updates including the 2024 Annual Monitoring Report, April 2024 housing land supply data and the latest planning status of allocated sites
- Respond to more recent discussions with promoters about their sites identified in the Preferred Options Consultation Document
- Improve its effectiveness for decision making following feedback from Development Management colleagues, and
- Have regard to the housing numbers and transitional arrangements for the progression of Local Plans at an advanced stage of preparation set out in the revised NPPF December 2024.

It is important to note that the report does not summarise all the representations received or identify every individual issue. The 'CCC response to the comments made' table also does not provide a response to each individual comment.

CCC responses to site allocation consultation comments appear under the relevant specific site policy.

The Council commissioned Essex Highways to review and consider the key issues raised in the highway and transportation responses received to the consultation. This report entitled Preferred Spatial Approach - Response to Representations (November 2024) is given in Appendix 2 and includes a review of the Transport Technical Note, prepared by Stomor (June 2024) on behalf of Little Baddow, Danbury, Boreham and Sandon Parish Councils. The Preferred Spatial Approach - Response to Representations (November 2024) report has been used by CCC to understand and respond to matters of concern raised in this You Said We Did report and to inform the Pre-Submission Local Plan.

**It is important to note that all comments received to the preferred options consultation have been reviewed and are noted. Overall, all support for the plan is welcomed. Objections/concerns raised are also acknowledged including the significant and high level of opposition to some sites including Hammonds Farm (SGS16a), Junction 18 A12 Employment Area (SGS16b) and Land West of Barbrook Way, Bicknacre (GS11c). To avoid duplication support for and objections to the plan have not been stated in the ‘CCC response to the comments made’ under each policy/section.**

All the comments received can be viewed in full on the Council’s [planning policy consultation portal](#).

Key statistics are included at the top of each section. Where relevant these include the number of yes/no responses and the number of written comments received to.

**Foreword**

This section of the consultation document provides a foreword from the Leader of the Council. Miscellaneous comments that do not relate to a specific or obvious section of the consultation document have been summarised here.

Key statistics:

| <b>Consultation point</b> | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---------------------------|------------|-----------|-----------------|----------------------------------|
| Foreword                  | 3          | 0         | 3               | 3                                |

Summary of Representations – main issues and suggested changes:

- Supportive of focus on climate action in response to the Council’s declared climate and ecological emergency in 2019 and proposed work towards reaching net zero by 2030 (CNG Fuels)
- Supportive of the spatial strategy and policy approach to climate change and the multifunctional benefits of green and blue infrastructure. Some limitations which need to be addressed within the Local Plan regarding sustainable and resilient growth and infrastructure capacity. In terms of locating growth where there is headroom to accept and treat additional flows at our water recycling centres within existing permits, and where new infrastructure is provided, the quantum of growth means carbon efficiencies can be achieved. Ongoing engagement will continue (Anglian Water)
- Add reference to a new sports stadium to be an aspiration and supported in principle within the Local Plan. Current Melbourne Park venue, used primarily by the Athletics Centre and Football Club, is not ideal as a shared facility for either sport.

| <b>CCC response to the comments made</b>   |
|--|
| Strategic Priority 1 has been amended to promote carbon resilience.  |
| Requirements for developments to provide sufficient wastewater treatment capacity have been strengthened in the plan, for example, site policies 7a-c. |
| There are no proposals in the Local Plan for a new sports stadium.   |

Sustainability is at the heart of the Pre-Submission Local Plan.

## **Introduction**

This section of the consultation document describes the consultation document and key information about the review process.

Key statistics:

| <b>Consultation point</b> | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---------------------------|------------|-----------|-----------------|----------------------------------|
| Introduction              | 4          | 4         | 40              | 40                               |

Summary of Representations – main issues and suggested changes:

- Document needs to be re-ordered in policy sequence and is too long and repetitive
- Several obstacles in the way for residents to respond including that the portal is overly complicated and a short consultation period
- Papers published one week before the Policy Board meeting did not give adequate time to review
- Consultation deadline should have been extended to allow for additional meetings following announcement of the General Election (Great Baddow Parish Council)
- Welcome continued engagement with CCC in relation to the authorities' respective local plan preparation (Southend-on-Sea City Council)
- Support the allocation of sites for Gypsy, Traveller and Travelling Showpeople housing needs (Basildon Borough Council)
- Development in Growth Area 3 could impact on the need for infrastructure within Basildon Borough. Regular Duty to Co-operate meetings requested to ensure that any emerging cross boundary issues are fully discussed and addressed (Basildon Borough Council)
- Cumulative traffic impacts could occur, especially along the A130 and A1245 towards the Fairglen interchange and the A12 towards J28 of the M25. Encourage collaboration with the local Highway Authority and National Highways to identify potential road network impacts for the IDP and plan policies (Rochford District Council, Brentwood Borough Council)
- Support the proposed Strategic Priorities and policies and recommend Statement of Common Grounds at the appropriate stage (Rochford District Council, Brentwood Borough Council)
- Chelmsford has engaged with us through the Duty to Co-operate, we are content with the contents and accuracy of the plan and satisfied it would be in general conformity with the basic conditions (Braintree District Council)
- Two cross boundary issues not adequately reflected in the plan are sustainable connectivity with South Essex and Thames Freeport. This requires joint working between South Essex authorities through SEC, CCC and ECC (Castle Point Council)

- Amend para. 1.35 to clarify that ECC is not required to be consulted on all non-mineral related development proposed within Safeguarded Areas (Essex County Council)
- Amend para. 1.39 to clarify that ECC is not required to be consulted on all non-waste related development proposed within Waste Consultation Areas (Essex County Council)
- Amend para. 1.42 to refer to ECC documents required to be submitted with planning applications and update the Council's Local Validation List to list these (Essex County Council)
- Non-Technical summary appears missing from the HRA (Natural England)
- Plan should draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups (Historic England)
- Work with your neighbours including London to ascertain whether any unmet needs will arise which will impact on the demand for new homes in Chelmsford (Home Builders Federation)
- Evidence base documents will require updating to reflect the change in circumstances, such as landscape, sustainable accessibility mapping, further IIA work and Infrastructure and Viability Report (Gladman Development Ltd)
- Refer to the South East Marine Plan remit which ranges from Mean High Water Springs (MHWS) or the tidal limit out to the territorial limit (Marine Management Organisation)
- The Chelmer Valley landscape is of great interest, and, through its association with Baker's writing, it can now also be regarded as nationally significant cultural landscape (Chelmer Valley Landscape Group)
- Continue to engage with the NHS and ICB on the Infrastructure Delivery Plan (IDP). Appropriate healthcare costs should be factored into the Local Plan Viability Assessment for relevant typologies (NHS Property Services Ltd)
- More needed on sustainability and reducing litter/waste
- More services/facilities should be provided in the town centre for youth groups.

| <b>CCC response to the comments made</b>   |
|--|
| The plan policies are shown in the order they would appear in the final plan and will be renumbered in later versions.   |
| The consultation exceeded requirements set out in legislation and the Council's Statement of Community Involvement.  |
| The Committee papers were published in line with Council policy.   |
| Request for continued Duty to Cooperate engagement is welcomed.  |
| Reasoned Justification amended to include the Thames Freeport cross-boundary issue.  |
| Reasoned Justification amended to clarify that ECC is not required to be consulted on all non-mineral related development proposed within Safeguarded Areas or all non-waste related development proposed within Waste Consultation Areas. |
| Reasoned Justification amended to refer to ECC documents required to be submitted with planning applications.  |
| Reasoned Justification amended to clarify the remit of the South East Marine Plan and to refer to marine licences.   |
| As Non-Technical Summary has not been produced for the HRA as it is an inherently technical report aimed at a technical audience, and there is no  |

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| requirement for it in the legislation. However, an executive summary has been produced.   |
| The Pre-Submission Local Plan and evidence base has been informed by engagement with Duty-to-Cooperate bodies including service providers through the updated Infrastructure Delivery Plan. |
| Measures to reduce the impact of development on the Chelmer Valley landscape are set out in the updated East Chelmsford Garden Community Site Policy 16a.                                   |
| Sustainability is at the heart of the Pre-Submission Local Plan.  |

## **About Chelmsford**

This section of the consultation document sets out the key challenges and opportunities to address over the plan period to 2041.

Key statistics:

| <b>Consultation point</b> | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---------------------------|------------|-----------|-----------------|----------------------------------|
| About Chelmsford          | 6          | 1         | 12              | 12                               |

Summary of Representations – main issues and suggested changes:

- The Great Eastern mainline rail route (GEML), Elizabeth line and A12 provide key strategic transport links and important commuting flows in both directions. (Transport for London)
- New green and blue infrastructure should accord with our Green Infrastructure Framework - Principles and Standards for England. Add references to protecting and enhancing the natural environment (Natural England)
- Reference the Essex Local Nature Recovery Strategy in paras 2.38, 2-39, 2.42 (Natural England)
- Where relevant there should be linkages with the Biodiversity Action Plan, Local Nature Partnership, Rights of Way Improvement Plans, Green Infrastructure Strategies and Nature Recovery Network (Natural England)
- Amend para. 2.14 to (i) add a reference 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 (Essex County Council)
- Amend Figure 6 and para. 2.23 to refer to the Great Eastern Mainline connections to Colchester, Ipswich and Norwich (Essex County Council)
- Comment from landowner/developer suggesting that their proposed development site will accord with the preferred plan/spatial strategy (Saxtons 4x4)
- Support key strategic objectives of the authorities to provide sufficient new homes (Mrs Mary Rance)
- Supportive of the Council key objectives
- Figure 15 misrepresents the size of the distance SWF is from The Dengie
- Urban area should be the focus for any new development.

## **CCC response to the comments made**

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| Reference added to the Essex Local Nature Recovery Strategy in the Reasoned Justification.   |
| No change to the Reasoned Justification in respect of strategic objectives of North and Central Essex authorities as this has previously been agreed between the Councils and cannot be altered unilaterally by CCC. |
| Amendments made to Figure 6 and transport section to refer to the Great Eastern Mainline connections to Colchester, Ipswich and Norwich.   |
| Amendments made to regional context section to include reference to South Essex and Thames Freeport.   |
| Figures updated to include latest data and provide clarity.  |

## **What are our Strategic Priorities**

This section of the consultation document sets out the Strategic Priorities which are the key priorities that the Local Plan is based on.

Key statistics:

| <b>Consultation point</b>         | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|-----------------------------------|------------|-----------|-----------------|----------------------------------|
| What are our Strategic Priorities | 20         | 11        | 50              | 50                               |

Main issues are listed under the Strategic Priority they relate to. The abbreviations in the sub-headings below relate to the Strategic Priorities as follows:

|            |                      |  |
|------------|----------------------|--|
| <b>SP1</b> | Strategic Priority 1 | Addressing the Climate and Ecological Emergency  |
| <b>SP2</b> | Strategic Priority 2 | Promoting smart, active travel and sustainable transport   |
| <b>SP3</b> | Strategic Priority 3 | Protecting and enhancing the natural and historic environment, and support for an increase in biodiversity and ecological networks |
| <b>SP4</b> | Strategic Priority 4 | Ensuring sustainable patterns of development and protecting the Green Belt   |
| <b>SP5</b> | Strategic Priority 5 | Meeting the needs for new homes  |
| <b>SP6</b> | Strategic Priority 6 | Fostering growth and investment and providing new jobs   |
| <b>SP7</b> | Strategic Priority 7 | Creating well designed and attractive places, and promoting the health and social wellbeing of communities                         |
| <b>SP8</b> | Strategic Priority 8 | Delivering new and improved infrastructure to support growth   |
| <b>SP9</b> | Strategic Priority 9 | Encouraging resilience in retail, leisure, commercial and cultural development   |

### **SP1**

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Southend-on-Sea City Council, Rochford District Council, Chignal Parish Council, North Chelmsford Villages

Community Group, Anglian Water Services Ltd, Sport England, Rosehart Properties, Hammonds Estates and Wates Developments, CNG Fuels, Dominus Chelmsford Ltd, Croudace Homes)

- Support the increased emphasis on addressing climate change and sequence of priorities (Broomfield Parish Council)
- Add emphasis on climate resilience, particularly in terms of flood risk management and move reference to the 10-year tree planting campaign under priority 3 (Anglian Water Services Ltd)
- Add reference to the Essex Local Nature Recovery Strategy in combating climate change, the role of nature-based solutions and the whole catchment approach to managing water resources (Natural England)
- Add reference to the remit of the South East Marine Plan remit and requirement of a marine licence (Marine Management Organisation)
- Support priority but it will not be achieved through housing allocations beyond the Green Belt away from the city. Undertake a Green Belt Review to identify more sustainable development options (Vistry Group)
- Plan does not have sufficient regard to the Council's wider corporate responsibilities including the aims of the Waterways Working Group (Vistry Group)
- The requirement for net zero development must be considered in terms of overall impact on development viability as the Local Plan continues (Dandara Eastern, Dandara) and align with national policies and regulations (Higgins Group, Hill Residential).

## **SP2**

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Essex County Council, Sport England, Rochford District Council, Chignal Parish Council, North Chelmsford Villages Community Group, Rosehart Properties, Hammonds Estates and Wates Developments, CNG Fuels, Dominus Chelmsford Ltd, Croudace Homes)
- Amend para. 3.6 to refer to ECC's Safer Greener Healthier campaign (Essex County Council)
- Hammonds Farm is not the most sustainable location with regards to transport connections and facilities available within the immediate community and does not fully accord with this priority (Dandara Eastern)
- Plan should prioritise development to areas which are already in sustainable well-connected locations (Dandar, Obsidian Strategic, Hill Residential) and avoid isolated development proposals (Higgins Group)
- Priorities should support opportunities to enhance the sustainability of existing service villages in line with the NPPF
- Support for promoting and encouraging active and sustainable travel but need to overcome barriers e.g., badly maintained pavements, pavement parking and scooting, bike thefts, poor and costly bus services
- Support expressed from public.

### **SP3**

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Rochford District Council, Chignal Parish Council, Environment Agency, North Chelmsford Villages Community Group, Rosehart Properties, Hammonds Estates and Wates Developments, Dandara, Hill Residential, Dominus Chelmsford Ltd, Croudace Homes)
- Ensure the plan is underpinned by up-to-date environmental evidence including local ecological networks and Local Biodiversity Action Plans. Explore opportunities for development to enhance ecological networks and ensure development decisions consider impact on soils. CCC is referred to various advice and guidance for more information (Natural England).

### **SP4**

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Rochford District Council, Essex County Council, Writtle Parish Council, Chignal Parish Council, North Chelmsford Villages Community Group, Hammonds Estates and Wates Developments, Dominus Chelmsford Ltd, Croudace Homes)
- Revise to refer to re-using suitable excavated materials and the following guidance 'The Definition of Waste: Development Industry Code of Practice; and The Waste Management' (Environment Agency)
- Amend para. 3.22 to be consistent with the NPPF e.g., to refer to practical and environmentally feasible prior extraction (Essex County Council)
- Include reference to directing new development to locations close to existing or proposed local facilities, so that people can walk, cycle or use public transport and be less reliant on the car (Richborough)
- Move reference to 'protecting the Green Belt' into priority 3 (Broomfield Parish Council)
- Insufficient evidence available to support approach that exceptional circumstances do not exist to review Green Belt boundaries (Rosehart Properties)
- A Green Belt review is required to identify suitable development areas currently within the Green Belt and to provide a more balanced/sustainable Spatial Strategy (Vistry Group, Whirlledge & Nott, Higgins Group, Croudace Homes, Hill Residential)
- Should assess opportunities for sustainable development in the Green Belt
- Ignoring the Green Belt skews development to areas which have already experienced significant growth.

### **SP5**

Summary of Representations – main issues and suggested changes:



- Support priority (Brentwood Borough Council, Rochford District Council, Essex County Council, Chignal Parish Council, North Chelmsford Villages Community Group, Rosehart Properties, Hammonds Estates and Wates Developments, Dandara, Higgins Group, Hill Residential, Dominus Chelmsford Ltd, Croudace Homes)
- Amend para. 3.24 to be consistent with the Strategic Housing Needs Assessment (SHNA) to refer to the significant demand for affordable housing, particularly rented affordable (Essex County Council)
- Add reference to meeting qualitative and quantitative housing needs in full in line with the NPPF (Richborough)
- Strengthen by referring to providing homes for those of working age to support the local economy (Hammonds Estates and Wates Developments)
- Strengthen ambition to meet the range of housing needs in full and make clear that growth is supported outside of Chelmsford (Obsidian Strategic Asset Management Ltd)
- Support expressed from public.

### **SP6**

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Rochford District Council, Chignal Parish Council, North Chelmsford Villages Community Group, Rosehart Properties, Hammonds Estates and Wates Developments, CNG Fuels, Dominus Chelmsford Ltd, Croudace Homes).

### **SP7**

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Rochford District Council, Chignal Parish Council, North Chelmsford Villages Community Group, Sport England, Rosehart Properties, Hammonds Estates and Wates Developments, Dominus Chelmsford Ltd)
- Insufficient consideration is being given to the health benefits of and creation of Public Rights of Way (PROWs) and bridleways (Essex Bridleway Association)
- Add that the built environment should prioritise safety, particularly for young women and girls, to create a more inclusive environment. Add reference to stewardship to reflect the Garden Community allocations (Hammonds Estates and Wates Developments, Croudace Homes).

### **SP8**

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Rochford District Council, Chignal Parish Council, Essex County Council, Environment Agency, North Chelmsford Villages Community Group, Sport England, Anglian Water)

Services Ltd, Rosehart Properties, Hammonds Estates and Wates Developments, Dominus Chelmsford Ltd, Croudace Homes)

- Amend para.3.39 to provide reassurance that the Preferred Option represents the best option in transport terms (Essex County Council)
- Add reference to support the shift to a low carbon community, prevent worsening congestion and encourage a variety of modes of travel behaviours (Hammonds Estates and Wates Developments)
- Include references to facilities and police, ambulance and fire and rescue (Essex Police)
- Support reference to service providers within this priority (Hill Residential)
- Expand para. 3.37 to refer to a sufficient rolling supply of employment land, meeting local and wide strategic needs and allocating new employment areas (Greystoke GB)
- The Spatial Strategy focuses pressure on existing infrastructure to a few limited locations. Exceptional reasons exist to justify a Green Belt review to identify sustainable Green Belt development locations (Whirledge & Nott, Croudace Homes)
- Traffic modelling needs to provide evidence that the A132 and B1012 has been modelled to include all the traffic from the Dengie to 2041.

## **SP9**

Summary of Representations – main issues and suggested changes:

- Support priority (Brentwood Borough Council, Rochford District Council, Chignal Parish Council, North Chelmsford Villages Community Group, Rosehart Properties, Hammonds Estates and Wates Developments, Dominus Chelmsford Ltd)
- The Council's Plan for Improving Rivers and Waterways should have a greater prominence given that significant change is planned to the River Chelmer during the plan period (Hammonds Estates and Wates Developments, Croudace Homes)
- Include actions to repair and increase the sea wall height around SWF by 2041.

## **Other**

Summary of Representations – main issues and suggested changes:

- The three priority groupings (climate, growth and place) effectively balance the demands of the planning system and provide coherent plan priorities (Basildon Borough Council)
- Add additional priority to pursue opportunities to enhance the sustainability of existing service villages to prevent them from stagnating (Croudace Homes)
- Plan policies and site allocations are not based on accurate evidence or NPPF complaint (Vishal Sharma PO24-9579).

|  |
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| <b>CCC response to the comments made</b> |
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|---|
| The Council can meet its development requirements without needing to undertake a Green Belt review. This approach accords with National Planning Guidance.  |
| Table of the propriety groupings has been added for clarity.  |
| SP1 – Supporting text amended to include the need for resilience to climate change, nature based mitigation solutions and tree planting, and reference to the Essex Local Nature Recovery Strategy. |
| SP2 – Supporting text amended to include reference to ECC’s Safer, Greener, Healthier campaign.   |
| SP3 – Supporting text amended to include reference to Natural England’s Green Infrastructure Framework.   |
| SP4 – Supporting text updated to include reference to the Waste Development Industry Code of Practice (DoWCoP); and clarification on prior extraction of minerals.                                  |
| SP5 – Supporting text amended to include rented affordable housing.   |
| SP7 – Built environment safety and stewardship matters are covered by SP6, Policy DM24 and Garden Community site policies SGS6 and SGS16.   |
| SP8 – Supporting text adjusted to refer to facilities alongside infrastructure, and to police, ambulance and fire and rescue.   |
| SP9 – already refers to the Council’s Plan for Improving Rivers and Waterways – no further reference is considered necessary.   |

## **Our Vision and Spatial Principles**

This section of the consultation document describes the long-term Vision and Spatial Principles for managing and accommodating growth within Chelmsford up to 2041 and beyond.

### **Vision for Chelmsford**

Key statistics:

| <b>Consultation point</b> | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---------------------------|------------|-----------|-----------------|----------------------------------|
| Vision for Chelmsford     | 7          | 5         | 21              | 21                               |

Summary of Representations – main issues and suggested changes:

- Support (Essex County Council, Anglian Water, Broomfield Parish Council, Chignal Parish Council, North Chelmsford Villages Community Group, Dandara, Basildon Borough Council, Dominus Chelmsford Limited, CNG Fuels Limited, Sport England, Wates Developments and Hammonds Estates LLP)
- Avoid repetition by translating into a broader statement around sustainable growth and addressing the climate and ecological emergency (Anglian Water)
- Add two additional bullet points to celebrate, conserve and enhance the City’s rural hinterland, and to maximise the opportunities of the countryside for healthy leisure activities, tranquillity and wellbeing (Broomfield Parish Council)
- Expand to encompass providing better village bus services and improving the safety of rural roads to encourage cycling and walking. Rural employment

sites should be accessible by sustainable means of transport (Chignal Parish Council)

- Expand to support our vibrant urban centres and very rural areas. Add new bullet on the health benefits of environmental tranquillity (North Chelmsford Villages Community Group)
- Explain how the bullet points relate to the vision and strategic priorities and will be used in future decision making (Hill Residential Ltd, Higgins Group, Dandara)
- Include reference to Green Belt (Higgins Group)
- Expand to refer to guiding growth towards a more sustainable community (Rosehart Properties Ltd, Croudace Homes)
- Amend to support opportunities to decarbonise the HGV sector (CNG Fuels Limited)
- Hammonds Farm is separated from the City by the A12 and contrary to the Vision. There are also questions over its deliverability (Dandara Eastern)
- Expand bullet 2 to support the logistics sector (Greystoke CB)
- The plan vision and our vision for Hammonds Farm strongly align. Enhance by referring to safety in bullet 10, the creation of new forms of connectivity in bullet 5, and by clarifying what is meant by modal shift (Wates Developments and Hammonds Estates LLP)
- Expand bullet 9 to refer to multifunctional green/blue infrastructure (Essex County Council)
- Expand bullet 9 to include reference to police facilities (Essex Police)
- Add new bullet to deliver Biodiversity Net Gain and wider environmental net gains, that forms an important component of nature recovery (Essex County Council)
- Do not support. Vision should acknowledge that development needs are to be met in full, including for housing (Richborough, Obsidian Strategic Asset Management)
- Various comments from landowners/developers suggesting that their proposed development sites will accord with the preferred Vision.

| <b>CCC response to the comments made</b>  |
|---|
| Brief explanation added of how the bullet points relate to the Vision.  |
| Protection of the Green Belt is addressed by Strategic Policy S1.   |
| Reference added to facilities alongside infrastructure relating to police, ambulance and fire and rescue.   |
| Safety, the creation of new forms of connectivity, modal shift and Biodiversity Net Gain are adequately addressed elsewhere in the Plan.  |
| The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process. |

## Spatial Principles

Key statistics:

| <b>Consultation point</b>                | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Strategic Policy S1 - Spatial Principles | 27         | 11        | 59              | 59                               |

Summary of Representations – main issues and suggested changes:

- Support expressed (Essex County Council, Anglian Water, Chelmer Housing Partnership (CHP), Cliffords Group Ltd, Tritton Farming Partnership LLP, Cliffords Group Ltd, Dominus Chelmsford Limited, Dandara Eastern, Wates Developments and Hammonds Estates LLP, Mr J Bolingbroke, Bloor Homes (Eastern), C J H Farming Ltd, Chignal Parish Council, Miscoe Enterprises Ltd, Tritton Farming Partnership LLP, Dandara Eastern, This Land, Hill Farm (Chelmsford) Ltd, A.G. & P.W.H Speakman, The Bucknell Family, Crest Nicholson, Dandara, Richborough, Pigeon (Sandon) Ltd, Daniel James Developments, Chris & Helen Copping, Martin Grant Homes)
- Support all except e. The settlement hierarchy is not a robust basis for identifying sustainable development locations. Amend to enable settlements outside the Green Belt to protect or create local services through targeted development, where appropriate (Broomfield Parish Council)
- Part c - Brownfield land may have high value for invertebrates and ecological surveys should be carried out to inform allocations and planning decisions (Natural England)
- Providing housing should be given more prominence and weight in the plan (Chelmer Housing Partnership (CHP))
- Disagree/concern expressed to part b. A Green Belt review is required to identify sustainable development opportunities in the Green Belt (Hill Residential Ltd, Higgins Group, Vistry Group, Whirledge & Nott, Croudace Homes, Martin Grant Homes)
- Include reference to the presumption in favour of sustainable development (Martin Grant Homes)
- Amend e to include identifying sustainable growth opportunities within the Green Belt which respect the development pattern and settlement hierarchy (Whirledge & Nott, Croudace Homes)
- Expand to also include service settlements e.g., Ford End which is proposed for new development (Dandara)
- Hammonds Farm is contrary to the principles (Obsidian Strategic, Dandara Eastern)
- The former BAE site should be allocated as a Special Policy Area (SPA) to guide its future redevelopment (Rosehart Properties Ltd)
- Place more emphasis on previously developed land (Dominus Chelmsford Limited)
- Expand h to include low carbon transport related infrastructure close to strategic transport junctions (CNG Fuels Limited)

- Plan proposals and site allocations fail to apply the principles in practice (Dandara Eastern, Vistry Group)
- Swap paras. 4.15 and 4.16 or merge h and i. Actively engaging with partners in 4.16 should apply to all new development not just significant new greenfield housing development (Wates Developments and Hammonds Estates LLP)
- Recommend an additional principle around integrating strategic green infrastructure with ecological networks and the wider landscape to deliver multiple environmental, social and economic benefits (Essex County Council)
- Object to plan reliance on the proposed garden communities, raising concerns over delivery in the early years of the plan period and disproportionately skewing new growth up to 2041 (Crest Nicholson)
- Expand supporting text of h and i to include references to police facilities (Essex Police)
- Various comments from landowners/developers suggesting that their proposed development sites will accord with the preferred Spatial Principles
- Do not agree. Need to include protection of Grade 2 agricultural land
- Parts a, h and l – for the policy to succeed it needs a strategy to link SWF to Chelmsford by regular public transport.

| <b>CCC response to the comments made</b>  |
|---|
| The Council can meet its development requirements without needing to undertake a Green Belt review. This approach accords with National Planning Guidance.  |
| Additional references to providing police facilities have been added to other parts of the plan including the Vision and Strategic Priorities – no further changes considered necessary.  |
| Reasoned Justification for Principles h and i to remain as written, as these are most applicable to the Spatial Principles they sit under. It should be noted that the Spatial Principles are not presented in any order of priority.   |
| Integration of strategic green infrastructure is more appropriately dealt with under strategic policies including S4, S9, S16 and site allocation policies.   |
| Other proposed development sites are dealt with in the consideration of Strategic Policy S7, and addressed by the Pre-Submission Integrated Impact Assessment.  |
| The Settlement Hierarchy is just one of a number of considerations for the Spatial Strategy, along with the Vision and Spatial Principles, and is considered to be a robust approach.   |
| The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process. |

## **Creating Sustainable Development**

This section of the consultation document sets out Strategic Policies which underpin and guide the Spatial Strategy by addressing climate change, promoting social inclusion, conserving and enhancing the historic and natural environment and safeguarding community assets.

### **Strategic Policy S2 – Addressing Climate Change and Flood Risk**

Key statistics:

| <b>Consultation point</b>                                      | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Strategic Policy S2 – Addressing Climate Change and Flood Risk | 13         | 5         | 36              | 36                               |

Summary of Representations – main issues and suggested changes:

- Support expressed for policy (Natural England, Anglian Water Services Ltd, Crest Nicholson, This Land, Essex County Council, Wates Developments and Hammonds Estates LLP, Obsidian Strategic Asset Management Ltd, C J H Farming Ltd, Chelmsford & Central Essex RSPB Local Group, Sport England, Chris & Helen Copping, Pigeon (Sandon) Ltd)
- Add direct reference to our Green Infrastructure Framework and recognition of Green Infrastructure’s role in strengthening climate change resilience (Natural England)
- Ensuring new development minimises flooding impact should be more ambitious towards delivering resilient growth and addressing opportunities for new strategic development to provide betterment in terms of flood risk (Anglian Water Services Ltd)
- Support expressed but emission reduction targets should consider the forthcoming 2025 Future Homes Standards (FHS) and not set a policy expectation that cannot be delivered and create viability issues. Review the viability assessment to consider Ministerial Statement ‘Local Energy Efficiency Standards Update’ and Government’s appraisal of the FHS. Amend policy to ‘encourage’ net zero emissions ‘as encouraged’ by DM31 (Chelmsford Garden Community Consortium, Vistry Group)
- Support expressed but optimise housing densities to reflect additional costs and constraints of Net-Zero carbon new homes on developers (Dominus Chelmsford Limited)
- Concern that net zero requirements is being applied retrospectively to existing allocated sites (Hopkins Homes Ltd)
- Requirements go beyond current policy and guidance, may impact viability and deliverability of residential development, are not justified by the evidence base (Whirledge & Nott, Hopkins Homes Ltd) and are inappropriate as standards will change/evolve over the plan period (Hill Residential Ltd, Higgins Group, Dandara, Dandara Eastern). Policy requirements should instead be ambitions and applied flexibly (Croudace Homes, Whirledge & Nott)
- Do not support. Exceeding Building Regulations Part F and L is unsound. Relying on building regulations should be considered a policy reasonable alternative as it is the preferred approach by government (Home Builders Federation)

- The South East Marine Plan policies such as SE-EMP-1 should be used as evidence to support the local plans policies (Marine Management Organisation)
- Add reference to the South East Marine Plan remit and requirements for marine licences (Marine Management Organisation)
- Recommend reference to the marine/coastal/intertidal element of the policy area, particularly where both terrestrial and marine habitats have the potential to be impacted by the policy (Marine Management Organisation)
- Reference the name of the future flood resilience scheme in the policy (Environment Agency)
- Add additional bullet to assist the delivery of net gain for biodiversity that will restore our ecosystems and deliver mitigation and adaptation benefits (Essex County Council)
- Include actions to repair and increase the sea wall height around South Woodham Ferrers by 2041
- Policies should set out appropriate nature-based solutions for climate mitigation and adaptation such as woodland or wetland creation or peatland restoration. Consider the Climate Change Adaptation Manual, Carbon Storage and Sequestration by Habitat and National biodiversity climate change vulnerability model (Natural England)
- Addressing climate change must be compatible with other planning objectives including housing delivery (Gladman Developments Ltd)
- Add support for the decarbonisation of the road freight industry (CNG Fuels Limited)
- Support expressed but amend to direct growth to sustainable settlements to reduce travel by private car and promote active travel modes of transport, and to locations served by new strategic infrastructure including the Chelmsford North East Bypass (Bloor Homes (Eastern))
- Policy should support viable housing delivery and allow for site-specific Viability Assessment at the planning application stage (Bloor Homes (Eastern))
- The Exception Test should describe that 100% of the built development (for vulnerable uses) at Hammonds Farm is in Flood Zone 1, outside of the floodplain. The new Garden Community will incorporate measures to mitigate flood risk both within and off-site in all flood zones (Wates Developments and Hammonds Estates LLP)
- There is a discrepancy between the Environment Agency Peak Rainfall allowance and the SFRA 1. According to the Environment Agency, Table 4-2 in the SFRA Level 2 should be in accordance with the table submitted alongside this comment (Wates Developments and Hammonds Estates LLP)
- Various comments from landowners/developers suggesting that their allocated or proposed development sites will accord with this policy
- Plan does not acknowledge CO2 emissions from the construction industry
- Plan must contain a policy requiring all new development, where practical, to install solar panels on roofs.



| <b>CCC response to the comments made</b>  |
|---|
| Reference to Natural England's Green Infrastructure Framework has not been included in Policy S2 as it is covered elsewhere in the Local Plan, notably section 3.   |
| Biodiversity Net Gain is addressed in other plan policies, notably Policy S4 and DM16 – it is not necessary to duplicate references in Policy S2.   |
| Additional bullet to restore our ecosystems and deliver mitigation and adaptation benefits has been included.   |
| The South East Marine Plan has been used as evidence to inform the Pre-Submission plan policies.  |
| Additional references to the South East Marine Plan remit and requirements for marine licences have been added to Section 1. As the plan is read as a whole, no further reference is considered necessary.  |
| Policy DM31 requires all new development to have rooftop solar photovoltaic (PV) panels.  |
| Amendments made to the policy and Reasoned Justification referencing integrated water management techniques.  |
| Whilst a named flood resilience cannot be stated at this time, reference has been added to a 'future flood resilience scheme'.  |
| Amendments made to the Reasoned Justification to include a reference to latest technical guidance, including the Environment Agency's and CIRIA.  |
| The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process. |

### Strategic Policy S14 - Health and Wellbeing

Key statistics:

| <b>Consultation point</b>                   | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---|------------|-----------|-----------------|----------------------------------|
| Strategic Policy S14 - Health and Wellbeing | 14         | 2         | 30              | 30                               |

Summary of Representations – main issues and suggested changes:

- Support policy and welcome reference to Sport England Active Design Principles (Sport England)
- Support expressed (Essex County Council, Anglian Water, Mid and South Essex Integrated Care Board (ICB), Wates Developments and Hammonds Estates LLP, Cliffords Group Ltd, Hill Farm (Chelmsford Ltd), Dominus Chelmsford Ltd)
- Amend to reference that tranquil landscapes can support mental health and wellbeing (Broomfield Parish Council)
- Define what is meant by an initial assessment to make the text clear that all larger scale developments should be the subject of a health impact assessment (Mid and South Essex Integrated Care Board (ICB))
- A site level HIA would repeat the plan IIA. HIAs may only be appropriate for larger unallocated sites where the impacts may not have been fully considered through the plan HIA (Home Builders Federation)

- Policy needs to be flexible, not every development will achieve each requirement given site constraints and characteristics. Add clarity on how a decision maker balances requirements when judging development proposals (Hill Residential Ltd and Higgins Group)
- Concern that requirements e.g., Livewell Development Accreditation Scheme, Sport England and National Design Guide Active Design principles are outside of the Local Plan process and subject to change without the same consultation and examination as other requirements (Hill Residential Ltd)
- Concern on how the viability of the policy has been considered (Hill Residential Ltd)
- Concern about the level of engagement needed with health care providers and identifying and delivering requirements in a timely manner to not delay developments (Hill Residential Ltd and Higgins Group)
- Suggest amendments to provide consistency and links with further guidance such as the Chelmsford Health and Wellbeing Plan, interconnectivity between the wider determinants of health, adaptable housing, Essex Design Guide and supplementary guidance (A New Development Model for Essex, October 2023) and Chelmsford Food Plan (2023) (Essex County Council)
- Policy does not address the needs of older people
- Healthcare facilities need to meet the needs of new communities.

| <b>CCC response to the comments made</b>  |
|---|
| Policy is designed to ensure that health and wellbeing is promoted within new development, rather than to identify existing places/areas which may help support mental health and wellbeing e.g. tranquil landscapes. |
| Reasoned Justification amended to clarify what and when HIAs will be required and to recommend early engagement with the Council and Essex County Council to inform decisions on development proposals                |
| Reasoned Justification amended to provide consistency and links with further guidance such as the Chelmsford Food Plan (2023).  |
| Site level HIAs will provide more detail on the health and wellbeing impacts of specific development projects.  |
| The Pre-Submission Local Plan is supported by an updated Viability Assessment 2024.   |
| Other plan policies seek to ensure that new development is supported by healthcare facilities, where appropriate, including site allocation policies and S9.  |
| Policy DM1 ensures that the plan provides for a mix of housing including for older people.  |
| No requirement to contribute towards priorities in the Essex Joint Health and Wellbeing Strategy added, as this document is subject to change and outside the control of CCC.   |
| Bullet 8 is specifically about access to nature, reference to services and facilities would be inappropriate.   |
| Other proposed amendments are not considered necessary/ appropriate/ or workable.   |

## Strategic Policy S15 – Creating Successful Places

Key statistics:

| Consultation point                                | Yes | No | Comments | Total number of responses |
|---|-----|----|----------|---------------------------|
| Strategic Policy S15 – Creating Successful Places | 1   | 2  | 11       | 11                        |

Summary of Representations – main issues and suggested changes:

- Support as a key priority. Could refer to stewardship as well as place-keeping (Wates Developments and Hammonds Estates LLP)
- The policy aligns with developer’s own development principles and is supported (Dominus Chelmsford Limited)
- Add a reference to the importance of providing the right amount and type of employment and business opportunities, particularly in larger developments and garden communities (Essex County Council)
- Considerations are suggested to minimise fire risk and spread of fire, ensure safe access, and reduce risks to water sources (Essex County Fire and Rescue Service)
- Concern that the policy could pose an unnecessary planning burden on functional development and do not support design codes which will be inflexible in some circumstances (CNG Fuels Ltd)
- This policy is already covered by S14 (bullet 3) (Dandara Eastern) and repeats the NPPF (Dandara, Higgins Group, Hill Residential).

| CCC response to the comments made   |
|---|
| Stewardship is an example of place keeping – so the specific reference is considered to be necessary.   |
| Providing the right amount and type of employment opportunities is already addressed in Plan policies including site allocation policies – no further references are necessary. |
| Fire risk is covered by Building Regulations and other legislation, which does not need to be repeated in the Plan.   |

### Strategic Policy S3 – Conserving and Enhancing the Historic Environment

Key statistics:

| Consultation point  | Yes | No | Comments | Total number of responses |
|---|-----|----|----------|---------------------------|
| Strategic Policy S3 – Conserving and Enhancing the Historic Environment | 6   | 1  | 10       | 10                        |

Summary of Representations – main issues and suggested changes:

- Support (Historic England, Dominus Chelmsford Limited, C J H Farming Ltd, This Land, Pigeon (Sandon) Ltd)
- Recommend use of the South East Marine Plan policies as evidence to support the plan policies (Marine Management Organisation)

- Do not support. Delete 'rare' in reference to the canal water feature at Boreham House in para. 5.36 as this is misleading (CNG Fuels Limited)
- Policy wording should state the specific designated heritage assets on site and nearby, and specific mitigation measures identified in site Heritage Impact Assessments. Where there are impacts policies should read: "Development should conserve or where appropriate enhance the significance of heritage assets .... including any contribution made to their significance by their settings. Appropriate mitigation measure including ... will be required (Historic England).

| <b>CCC response to the comments made</b>  |
|---|
| Additional references to the South East Marine Plan remit and marine licences have been added to Section 1. As the plan is read as a whole, no further reference is considered necessary.                                       |
| It is rare to have a linear canal water feature at Boreham House. It is unique to Essex and the only other known early eighteenth-century example is Shotover in Oxfordshire. The description as 'rare' is therefore justified. |
| Heritage Impact Assessments were undertaken and published alongside the Preferred Options Local Plan. Site policies consider significance of designated and non-designated heritage assets.                                     |

#### Strategic Policy S4 – Conserving and Enhancing the Natural Environment

Key statistics:

| <b>Consultation point</b>  | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Strategic Policy S4 – Conserving and Enhancing the Natural Environment | 8          | 6         | 31              | 31                               |

Summary of Representations – main issues and suggested changes:

- Support for the policy (Environment Agency, Natural England, Wates Developments and Hammonds Estates LLP, Chelmsford and Central Essex RSPB Local Group, CJH Farming Ltd, Pigeon (Sandon) Ltd)
- The policy ambition for 20% BNG is welcomed (Anglian Water Services Ltd)
- Suggest referencing other relevant evidence documents and the Local Nature Recovery Strategy and Networks (Essex County Council, Anglian Water Services Ltd)
- Add a reference to our Local Character Landscapes study, which highlights important and distinctive rural landscapes which should be valued and protected (Chignal Parish Council)
- Local Plan could draw on policies in the South East Inshore Marine Plan (Marine Management Organisation)
- The importance of the underlying aquifer/groundwater resource should be noted, with references added to pollution and protection guidance (Environment Agency)

- Make the distinction between public green spaces and wildlife habitats, with greater focus on integrating biodiversity rather than segregation; planting and biodiversity features should use native species; and call for riparian corridors to maintain a buffer zone for public space rather than private gardens (Environment Agency)
- RAMS contributions are welcomed, but additional accessible greenspace may also be required (Natural England)
- Contributions are no longer required to be secured towards recreational mitigation measures at Hatfield Forest SSSI/NNR (Natural England)
- Protection of best and most versatile agricultural land should be strengthened to support food security and shorten supply routes (Broomfield Parish Council)
- Opposition to a requirement for 20% BNG on the Garden Community Sites as it exceeds national requirements, and has not taken the cumulative effect of this and required tree planting into account (Bellway Homes Ltd)
- Concerns about the deliverability of 20% BNG on large greenfield sites; the policy should be more flexible to express this as a target and not a requirement (Whirledge and Nott, Croudace Homes, Vistry Group)
- Clarification of the BNG provision is needed, e.g. is delivery per phase or for overall development; offsite provision may be more appropriate so greater flexibility is suggested (Chelmsford Garden Community Consortium)
- The requirement for 10% BNG on most development is welcomed; a higher percentage of BNG would need robust evidence (Obsidian Strategic Asset Management, Dandara Eastern, Dandara, Hill Residential Ltd, Dominus Chelmsford Limited)
- Higher BNG requirements should take account of viability considerations, and a take more realistic view of the costs than assumed in the evidence base, which appear to be too low (Dandara Eastern).

| <b>CCC response to the comments made</b>   |
|--|
| References added to other relevant evidence documents and the Local Nature Recovery Strategy.  |
| The plan is supported by its own landscape evidence base.  |
| The South East Marine Plan has been used as evidence to inform the Pre-Submission plan policies.   |
| 10% BNG is a national requirement. 20% BNG for the Garden Community allocations has been subject to viability testing and is deliverable.  |
| References to contributions towards recreational mitigation measures at Hatfield Forest SSSI/NNR have been removed as they are no longer required.   |
| The distinction between public green spaces and wildlife habitats, biodiversity integration, use of native species and riparian corridor a buffer zones added to DM16. As the plan is read as a whole, no further reference is considered necessary. |
| Additional accessible greenspace is addressed in the Reasoned Justification and relevant site policies - no further reference is considered necessary.   |

## Strategic Policy S5 – Protecting and Enhancing Community Assets

Key statistics:

| Consultation point  | Yes | No | Comments | Total number of responses |
|---|-----|----|----------|---------------------------|
| Strategic Policy S5 – Protecting and Enhancing Community Assets | 8   | 1  | 15       | 15                        |

Summary of Representations – main issues and suggested changes:

- Support for the policy as it recognises the importance of sports and leisure facilities in new development and the need to secure new provision through planning obligations or CIL (Sport England)
- The proposal that existing community assets will need to be protected from inappropriate changes of use or redevelopment is supported as this is necessary for meeting current and future community needs (Sport England)
- Support for the policy (Dominus Chelmsford Limited, Cliffords, Hill Farm (Chelmsford) Ltd, Dandara/Dandara Eastern, Obsidian Strategic)
- Add references in policy and para. 5.59 to safe and cohesive communities and the protection of police facilities (Essex Police)
- Policy could be extended to community coastal assets using the South East Marine Plan policies as evidence (Marine Management Organisation)
- Support for the provision of sufficient, quality community facilities but the policy should be more flexible to avoid unjustified delays to vital reinvestment in health facilities and services for the community. The disposal of no longer suitable or redundant healthcare sites and properties helps to fund new or improved services (NHS Property Services Ltd).

| CCC response to the comments made   |
|---|
| Reasoned Justification amended to refer to safe and cohesive communities and the protection of police uses. |
| Policy covers a wide range of community assets – listing all types of assets is not considered necessary.   |
| The policy is consistent with national planning policy, and appropriately covers healthcare facilities.     |

### **How will Future Development Growth be Accommodated?**

This section of the consultation document sets out Strategic Policies which underpin and guide the Spatial Strategy including policies related to securing infrastructure and delivering growth.

How will Future Development Growth be Accommodated? (paragraph 6.1)

Key statistics:

| Consultation point | Yes | No | Comments | Total number of responses |
|--------------------|-----|----|----------|---------------------------|
| Paragraph 6.1      | 0   | 0  | 1        | 1                         |

Summary of Representations – main issues and suggested changes:

- Add that the strategic policies in this section secure ‘facilities’ as well as infrastructure (Essex Police).

### Strategic Policy S6 – Housing and Employment Requirements

Key statistics:

| <b>Consultation point</b>                                 | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---|------------|-----------|-----------------|----------------------------------|
| Strategic Policy S6 – Housing and Employment Requirements | 19         | 24        | 74              | 74                               |

Summary of Representations – main issues and suggested changes:

- Support/some support for requirements and approach (Essex County Council, Basildon Borough Council, Rochford District Council, Brentwood Borough Council, Castle Point Council, Anglian Water Services Ltd, Broomfield Parish Council, S J R Farming, Hawridge Land, Dominus Chelmsford Limited, Obsidian Strategic Asset Management Ltd, Dandara Eastern, Cliffords Group Ltd, Wates Developments and Hammonds Estates LLP, Vistry Group, C J H Farming Ltd, Seax Development, Miscoe Enterprises Ltd, Home Builders Federation, This Land, Hill Farm (Chelmsford) Ltd, Van Diemens Property Company, Mrs A Mossman, A.G. & P.W.H Speakman, The Bucknell Family, Redrow Homes & Speakman Family, Crest Nicholson, Whirledge & Nott, Croudace Homes, Dandara, Pigeon (Sandon) Ltd, Daniel James Developments, Woosington One, Welbeck Strategic Land V Limited)
- Support supply buffer (Broomfield Parish Council, Wates Developments and Hammonds Estates LLP, Dandara)
- Use some supply buffer to target affordable homes for local people in perpetuity e.g., through a Community Land Trust (Broomfield Parish Council)
- Expand para 6.16 for employment growth and skills capacity to aim to match levels of housing growth to help reduce out commuting (Essex County Council)
- Request whether Chelmsford can accommodate any of their unmet housing need (Castle Point Council and Southend-on-Sea City Council)
- Amend Part A to read ‘at least’ 1,000 net new homes (Mrs A Mossman)
- Use updated annual housing requirement (913 as stated in Turley, March 2024) and give high priority to bring empty properties back into use (Danbury Parish Council)
- Explore a higher housing requirement to meet all the housing needs of the area’s residents including those living in unsuitable accommodation and newly forming households (Tritton Farming Partnership LLP)
- Need to consider how the ageing population affects housing needs as there is a significant growing need for more specialist housing units (Opus Little Waltham Developments Ltd)

- Housing for older people should have its own requirements and standalone policy (McCarthy Stone)
- Include requirements for elderly persons within the policy. Allocated sites will not meet needs alone (Mrs Mary Rance)
- Increase requirements above the minimum Standard. Reasons cited include to deliver greater choice and more affordable housing, address the housing crisis, reduce reliance on windfall sites, help meet neighbouring area's unmet needs, past housing delivery records and the significant new infrastructure coming to the area (Hill Residential Ltd, Tritton Farming Partnership LLP, Higgins Group, Gladman Developments Ltd, Bloor Homes (Eastern), Richborough, Martin Grant Homes)
- Expand Table 1 to reflect the amendments made to the yields of existing allocations and increase supply buffer to 20% to address in part an historic under delivery of affordable housing (Richborough)
- Need a more balanced/diverse pool of allocations, including small-medium sites (Martin Grant Homes) which are not/less constrained by infrastructure burdens rather than relying on Garden Communities (Richborough, Welbeck Strategic Land V Limited)
- Based on previous delivery rates, apply a non-implementation rate to allow for an element of under-implementation (Obsidian Strategic Asset Management Ltd), allocate more housing sites (Dandara, Welbeck Strategic Land V Limited) and identify Green Belt and non-Green Belt reserve sites (Newell Properties Development Ltd)
- No evidence that windfalls will continue to come forward given likely declining opportunities within built up areas. Affordable housing delivery will likely be lower than required. There is no assessment of the potential for double counting with the 3,745 homes that have permission and are capable of being built out in the next 5 years and beyond (Martin Grant Homes)
- The Duty to Co-operate Statement is unclear on what co-operation has taken place in relation to housing delivery and any unmet housing needs (Obsidian Strategic Asset Management Ltd)
- Plan needs to allocate more sites that could deliver more quickly based on previous housing delivery records and given Hammonds Farm will come forward later in the plan period (Dandara Eastern, Welbeck Strategic Land V Limited)
- Until the Gypsy and Traveller Accommodation 2024, we are unable to comment on numbers (IBA Planning Ltd, Vistry Group)
- Reconsider if the large strategic allocations will meet Gypsy and Travellers and Travelling Showpeople needs within a reasonable timescale. Confirm if the Gypsy and Traveller Accommodation Assessment includes Roselawn Farm in the baseline (IBA Planning Ltd)
- Do not support/object to policy (IBA Planning Ltd, Vistry Group, Chelmsford Garden Community Consortium, Mrs Mary Rance, McCarthy Stone, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- The evidence base and planning logic for Hammonds Farm is questionable (Dandara Eastern)



- No need to allocate sites 16a and 16b and their potential benefits do not outweigh the significant adverse impacts. Alternative locations with less harmful impacts have not been properly considered. Hammonds Farm is not needed to address the area's housing requirements (as recommended by the Strategic Housing Needs Assessment). Existing employment allocations and commitments can meet minimum employment requirements, so Junction 18 of the A12 employment allocation is not needed (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- As Little Boyton Hall Farm Rural Employment Area (Location 15) is inaccessible by bus, walking or cycling it will lead to an increase in congestion on local roads (Chignal Parish Council)
- Spatial Strategy should support the rural and City economy and Chelmsford's status as a regional hub for employment (Hill Farm (Chelmsford) Ltd, Van Diemans Property Company)
- Encourage development of existing employment sites in sustainable locations given long lead-in times for large strategic site allocations (Rosehart Properties Ltd)
- Scenario 3 of the Employment Land Review (ELR) 2023 does not fully account for the planned growth in the economically active population
- The employment requirements are insufficient to meet the growing need of logistics in the area, given the locational advantages on the A12 corridor and the shift to larger warehouses and greater automation. In line with national policy, an objective assessment of the requirements of the logistics sector across the sub-region is required (Greystoke CB)
- Need to consider sites for employment in rural areas (The Bucknell Family)
- Spatial Strategy lacks a proportionate, district wide distribution of growth and infrastructure (Whirledge & Nott, Croudace Homes)
- Extend plan period to 2042/3 to allow for any timetable slippage and increase developments requirements accordingly (Gladman Developments Ltd, Greystoke CB)
- Various comments from landowners/developers promoting their proposed development sites will accord with the proposed Spatial Strategy
- There should be a high priority to bring empty properties back into use
- Support housing requirements
- Do not agree. An additional 4,000 homes are unnecessary, unsustainable, and make compliance with the Vision impossible.

| <b>CCC response to the comments made</b>   |
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| Policy updated to reflect the proposed transitional arrangements for housing need and use of the new Standard Method to set housing figures and annual targets.  |
| Policy updated to reflect the Gypsy and Traveller Accommodation Assessment (GTAA) 2024 which has been published.   |
| Policy 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 for Chelmsford between 2022 and 2041. |
| This plan seeks to meet and where appropriate exceed the minimum employment requirements over the plan period.   |

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| The size and type of housing, including that for new households and older people, is set out in policy DM1, and it is not appropriate to include it here.   |
| Do not amend Reasoned Justification as employment growth and skills capacity is addressed in Policy S8 and reducing out commuting is not a plan requirement.  |
| References to the employment evidence are included within the policy.   |
| CCC has engaged with Castle Point Council and Southend-on-Sea City Council through the Duty to Co-operate and advised that Chelmsford cannot accommodate any of their unmet housing need.   |
| Site allocation policies have been amended to require contributions towards police facilities.  |
| See relevant site allocation policies for responses to site specific comments.  |
| The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process. |

### Strategic Policy S7 – The Spatial Strategy

Key statistics:

| <b>Consultation point</b>                 | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---|------------|-----------|-----------------|----------------------------------|
| Strategic Policy 7 – The Spatial Strategy | 21         | 32        | 144             | 144                              |

Summary of Representations – main issues and suggested changes:

- Support/broad support expressed (Essex County Council, Anglian Water Services Ltd, Richard Speakman, Hawridge Land, Hallam Land Management, Cliffords Group Ltd, Gladman Developments Ltd, Wates Developments and Hammonds Estates LLP, Mr J Bolingbroke, C J H Farming Ltd, Seax Development, North Chelmsford Villages Community Group, Miscoe Enterprises Ltd, Cliffords Group Ltd, A.G. & P.W.H Speakman, The Bucknell Family, Redrow Homes & Speakman Family, Dandara, Pigeon (Sandon) Ltd, Daniel James Developments, Welbeck Strategic Land V Limited)
- Most new allocations will come forward from 2029 which will enable alternative wastewater treatment solutions to be developed where capacity is constrained (Anglian Water Services Ltd)
- Mostly support but using the Settlement Hierarchy to allocate future development is not effective or sustainable in practice. Delete references to the Settlement Hierarchy in the policy (Broomfield Parish Council)
- Delete requirement for GS9a to make a financial contribution to the Chelmsford North East Bypass as it is not needed (Essex County Council)
- Amend paras 6.43 and 6.49 and site policies to read that SGS6, 7, 8, 16a and 16b will help to deliver strategic infrastructure including the Chelmsford North East Bypass (Essex County Council)
- Amend para 6.24, bullet 1 to read ‘Sustainable urban extensions of Chelmsford, Great Leighs and South Woodham Ferrers for new housing and employment’ (Essex County Council)

- Add to all site policies infrastructure requirements to ensure wastewater treatment and disposal is available, including any required mitigation with the sewerage network (Environment Agency)
- After 'infrastructure' in line 2 of the penultimate paragraph add 'and facilities' (Essex Police)
- Site allocations and their respective policies need to be informed by Heritage Impact Assessments (Historic England)
- Reconsider if the large strategic allocations will meet Gypsy and Travellers and Travelling Showpeople needs within a reasonable timescale. Confirm if the Gypsy and Traveller Accommodation Assessment includes Roselawn Farm in the baseline (IBA Planning Ltd)
- Support rejection of Chatham Green and to expansion of SGS2 and SGS8 (Broomfield Parish Council)
- Expand reasons for rejecting expansion of Broomfield village to include landscape capacity and sensitivity, risk of settlement coalescence and primary school capacity concerns (Broomfield Parish Council)
- Agree with dismissal of alternative development sites (Wates Developments and Hammonds Estates LLP)
- Clarify in reasonable alternative text that significant expansion of North East Chelmsford is proposed during the plan period to 2041 (Wates Developments and Hammonds Estates LLP)
- There are no overriding constraints to the allocation of land at Junction 17 A12 (Greystoke CB)
- Enlarge Little Boyton Hall Rural Employment Area (Growth Site 15) and allocate for E(g)(i-ii) alongside B2 and B8 (C J H Farming Ltd)
- Requirements for masterplans on strategic sites should be on a site-by-site basis to reflect issues such as land use and landownership (C J H Farming Ltd, Pigeon (Sandon) Ltd)
- Object to 10 Traveller pitches for SGS6 (Chelmsford Garden Community Consortium) and additional travelling showpeople plot (Vistry Group)
- Unable to comment on Gypsy and Traveller requirements in absence of the Gypsy and Traveller Accommodation 2024 (Chelmsford Garden Community Consortium, Vistry Group)
- Reinstate adopted plan wording for around 1,200 new homes and around 1,000sqm of business floorspace for SGS10 (Vistry Group)
- Do not support/opposition expressed for policy (IBA Planning Ltd, Obsidian Strategic, Dominus Chelmsford Limited, Bloor Homes (Eastern), Vistry Group, Tritton Farming Partnership LLP, Dandara Eastern, This Land, Crest Nicholson, Mr Paul Hopkins, Richborough, ARU, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Mr and Mrs Andrew Parker, Mrs Fiona McCallum, Taylor Wimpey, Martin Grant Homes, Croudace Homes, Barratt David Wilson (Eastern Counties))
- Increase the housing requirement to help deliver more homes (Hallam Land Management), ensure development needs are met (Farming Partnership LLP, Newell Properties Development Ltd) and to address uncertainties with windfall sites (Urban Provincial, Martin Grant Homes)

- Proposed allocations fall short of housing requirements (Opus Little Waltham Developments Ltd)
- Housing trajectory is unrealistic without more allocations including within the Green Belt (Newell Properties Development Ltd)
- Existing allocated large-scale sites are not meeting the time-scales as predicted in the draft Plan (Dandara)
- The 20% buffer is largely formed by dwellings which are potentially undeliverable in the Plan period (Martin Grant Homes)
- Projected housing supply in the first five years is too ambitious and needs to be revised. Confirm status of allocated sites rolled forward to demonstrate delivery (Martin Grant Homes)
- Provide evidence to explain (i) how the preferred options were selected and (ii) the availability of services, functional relationships and sustainability used to inform the Settlement Hierarchy (Martin Grant Homes)
- Amend Settlement Hierarchy to read 'Chelmsford Urban Area'
- Allocate more small/medium housing and employment sites (Opus Little Waltham Developments Ltd, Richard Speakman, H R Philpot & Sons, Hill Farm (Chelmsford) Ltd, Van Diemans Property Company, Dandara, Mrs Carolyn Morling, Mr James Gardner, Bellway Strategic Land, Martin Grant Homes) including housing sites under 1ha (Tritton Farming Partnership LLP)
- Allocate a greater variety of site sizes cross more parts of the plan area including in/on the edge of Chelmsford Urban Area and in/around villages e.g., to ensure a more balanced distribution of growth and support rural areas and (Bloor Homes (Eastern), Seax Development, Gladman Developments Ltd, S J U 2016 discretionary settlement trustees, Dominus Chelmsford Limited, Hill Residential Ltd, Higgins Group, Miscoe Enterprises Ltd, Tritton Farming Partnership LLP, Bellway Homes Ltd, H R Philpot & Sons, Cliffords Group Ltd, Mr Graham Weal, A.G. & P.W.H Speakman, The Bucknell Family, Crest Nicholson, Mrs Carolyn Morling, Mr James Gardner, Taylor Wimpey, Martin Grant Homes, Barratt David Wilson (Eastern Counties))
- Provide Almshousing to help meet local affordable housing needs (Seax Development, Miscoe Enterprises Ltd)
- Provide housing for the elderly to meet local needs (J & T Wardrop and the Wardrop Trust)
- Plan needs a co-living policy (Highgate Capital Ltd)
- Review the Green Belt to identify the most sustainable strategy and sustainable Green Belt releases (Obsidian Strategic, Vistry Group, Mrs R Armstrong and Mr B Howard, H R Philpot & Sons, Newell Properties Development Ltd, Whirlledge & Nott, Croudace Homes, Taylor Wimpey, Martin Grant Homes, J & T Wardrop and the Wardrop Trust, Barratt David Wilson (Eastern Counties))
- Not undertaking a Green Belt Review has led to unsustainable development patterns e.g., increased journey times to the City Centre, a lack of community infrastructure in areas and poor cohesivity with existing communities (Barratt David Wilson (Eastern Counties))

- Allocate additional/expand existing employment sites (including in the Green Belt) to provide flexibility and support existing employment areas/businesses (S J R Farming, Hill Farm (Chelmsford) Ltd, Saxtons 4x4)
- Policies S7, S8 and S11 should more clearly support rural businesses changing, expanding, adapting and improving to avoid disagreements at planning application stage (Strutt & Parker)
- Review of the role of the Green Wedge to promote active travel corridors and improve accessibility of the Green Wedge to areas of wildlife/ecological value (Cliffords Group Ltd)
- Review the Green Wedge to establish areas of land that serve little contribution to the role and function of the Green Wedge and to identify the most sustainable development options (Miscoe Enterprises Ltd, Hill Farm (Chelmsford) Ltd, Mr Graham Weal, The Bucknell Family, Mr Paul Hopkins)
- Plan is too reliant on large strategic sites (e.g. Garden Communities) making it inflexible/unreliable. There are delivery and viability risks/issues with such sites, long lead in times and the housing trajectory is over ambitious (Urban Provincial, Opus Little Waltham Developments Ltd, Richard Speakman, Hill Residential Ltd, Obsidian Strategic, Tritton Farming Partnership LLP, Bloor Homes (Eastern), Dandara, Bellway Homes Ltd, This Land, Dandara, Martin Grant Homes, Bellway Strategic Land, Martin Grant Homes, Croudace Homes, Welbeck Strategic Land V Limited, Barratt David Wilson (Eastern Counties))
- Concern/objection to Hammonds Farm allocation. Comments cited include previously scored poorly, physically and spatially detached from Chelmsford, requires significant infrastructure investment and too optimistic modal shift targets. More sustainable, accessible locations have been dismissed (Dandara, Bellway Homes Ltd, This Land, Bellway Strategic Land, Croudace Homes, Barratt David Wilson (Eastern Counties), Gladman Developments Ltd, Vishal Sharma)
- Council has ignored its evidence base (Croudace Homes) including by selecting Hammonds Farm over better performing sites (Mr and Mrs Andrew Parker)
- SGS16a and b are not needed to meet the area's housing and employment requirements; are in unsustainable and inaccessible locations; would have significant adverse impacts that cannot be adequately mitigated including on flood risk, highway network, landscape, heritage, loss of agricultural land, wildlife, ecology and minerals safeguarding; are situated within a highly sensitive setting; would significantly impact multiple Parishes and contradict relevant 'made' and emerging Neighbourhood Plans, and are premature as the land is a potential new area for a 'National Landscape' designation (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Croudace Homes)
- There is large-scale public objection to Hammonds Farm and there have been no changes since the plan adoption to warrant removing the land's current level of high protection (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)

- The proposed benefits of the Hammonds Farm development (e.g. new country park) do not outweigh the harm; the Council's evidence base is questionable/unsound and not all impacts have been properly assessed. More sustainable options to SGS16a and have been rejected without proper interrogation including the continued expansion of NEC, smaller-scale allocations across the Settlement Hierarchy and Green Belt development through a review. A landscape assessment, heritage assessment, flood risk statement and transport technical note are submitted alongside the representation (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- Hammonds Farm would be a long-term option and commencing before completion of North East Chelmsford will split available infrastructure funding and market interest. The Spatial Strategy fundamentally departs from the adopted Local Plan and 'made' Neighbourhood Plans, and the rationale for this 'U'-turn is unclear and unjustified (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- Separation between Chelmsford and Danbury would largely disappear with Hammonds Farm contrary to the Spatial Principles (The Danbury Society)
- Hybrid Spatial Strategy options were not part of the consultation (The Danbury Society)
- Constraints at SGS6 and Great Leighs SGS7 (e.g. heritage, Critical Drainage Area) could delay delivery (Wates Developments Limited, Urban Provincial)
- Splitting the Settlement Hierarchy by Outside and Within the Green Belt is not justified and fails to reflect development opportunities across the plan area (Hill Residential Ltd, Higgins Group)
- South Woodham Ferrers should be its own category in the hierarchy given its scale and service provision
- Delete requirement for proposals within Special Policy Areas to be considered against an approved masterplan as education priorities date quickly requiring regular costly updates. Instead assess proposals against prevailing plan policies (ARU)
- Spatial Strategy should specifically recognise the needs of the logistics sector in Chelmsford (Greystoke CB)
- Increase capacity of GS17b to at least 30 dwellings in line with the SHELAA (Mrs A Mossman)
- Expand allocations 3b, 3c and 3d at East Chelmsford (Redrow Homes & Speakman Family)
- Expand 14b for 50 homes (Dandara)
- 20 units at 11c fails to make effective use of land. Allocate for more homes to help deliver improvements to local services and facilities (Welbeck Strategic Land V Limited)
- Increase allocation for Danbury. Question suitability of allocating through the Neighbourhood Plan which is not time-controlled risking delayed site delivery (Richborough)
- Provide more flexibility on growth outside settlement limits (Park View Group)

- Various comments from landowners/developers/promoters promoting that their proposed development sites should be allocated in the Spatial Strategy and added to the Key Diagram
- Various comments disagreeing with the Council's SHELAA 2024 site assessment methodology and/or scoring of their submitted sites
- The A132/B1012 Improvements fail to consider the increase in traffic flows from the development to the east of SWF
- The Secretary of State regarded about 1000 homes acceptable for SGS10
- Better to build on brownfield land or the edge of large towns
- Consider traffic impacts of RHS Hyde Hall Special Policy Area which will be improved/enlarged causing increased traffic on Willow Grove
- Support expressed including protection of the Green Wedge and Green Belt
- Opposition expressed e.g., development proposals will spoil the countryside, adversely impact on road safety and congestion
- Build on brownfield land or the edge of large towns
- Opposition expressed to Hammonds Farm allocation. Reasons include it is not properly evidenced or justified; loss of agricultural land; more sustainable locations are available; lack of existing infrastructure; landscape, biodiversity and heritage impacts, increased traffic impacts and congestion; no guarantee that the development and infrastructure can be delivered in the time scale; shortage of GPs; pollution; detached from Chelmsford; not close to new and existing transport infrastructure such as the new bypass; would require disproportionate investment in highways infrastructure, and lack of existing utility provision
- There is no advantage to Hammonds Farm over North East Chelmsford
- Hammonds Farm should not be the sole major growth area
- Need to undertake a Green Belt Review to identify sustainable new housing Green Belt settlements to sustain their vitality and services
- Unclear why expansion of North East Chelmsford is no longer deliverable since the Issues and Options consultation
- There is nothing to prevent mineral extraction and housing development in North East Chelmsford over the plan period
- Plan is premature as Labour propose 'grey belt' land which could be a better alternative to Hammonds Farm
- Re-distribute growth around planned new infrastructure i.e. North East Chelmsford and away from Hammonds Farm
- Concerns about 14a and 14b e.g., loss of agricultural land and flood risk
- Question classification of Ford End as a Service Settlement as it lacks services including a shop
- Opposition expressed to SGS2 and SGS3
- Consider growth east of Great Baddow, north of Writtle village, and land surrounding Galleywood and Danbury instead of proposed spatial strategy
- Large solar farms should be designated and shown as semi industrial on Local Plan diagrams.

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| <b>CCC response to the comments made</b> |
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| Wording added to Settlement Hierarchy to clarify that 'Chelmsford' includes its Urban Area such as Chelmer Village, Great Baddow and Springfield.  |
| The Settlement Hierarchy ranks settlements according to their size, function, characteristics and sustainability. It is one of many factors used to inform where development is most sustainable and informs planning decisions so is retained.  |
| Reference to exception sites in the Policy expanded to include affordable and community-led developments.  |
| Reference to 'sustainable urban extensions' in the Reasoned Justification expanded to clarify these include extensions at Great Leighs and South Woodham Ferrers, as well as Chelmsford.   |
| Reasoned Justification updated to reflect latest predicted losses of Grade 2 and Grade 3 agricultural land as a result of development in the Plan.   |
| Requirement for GS9a to make a financial contribution to the Chelmsford North East Bypass deleted as evidence shows it would be unreasonable to require this site to contribute to this.   |
| Reasoned Justification amended to refer to SGS6, 7a, 7b, 7c and 8 helping to deliver strategic infrastructure including Section 1a of the Chelmsford North East Bypass.  |
| All numbers and locations updated to reflect latest housing, employment and Gypsy and Traveller numbers and site allocations.  |
| Site policies have been amended to ensure wastewater treatment and disposal is available, including any required mitigation with the sewerage network.   |
| Reference to the need for police facilities has been added to Policy S9 and relevant site policies. The Plan should be read as a whole, so it is not necessary to duplicate in this Policy.  |
| Heritage Impact Assessments were published alongside the Preferred Options Local Plan and have been used to inform site allocation policies.   |
| Large strategic allocations will meet Travelling Showpeople needs in full with delivery on some sites within the first five years of the Plan.   |
| The 2024 Gypsy and Traveller Accommodation Assessment includes Roselawn Farm in the baseline and is published as part of the evidence base.  |
| Due to the lack of available and suitable alternative sites for Gypsies, Travellers and Travelling Showpeople, and the need to build cohesive and inclusive communities, the most appropriate way to meet these needs is through larger strategic site allocations.  |
| Information on reasonable alternatives that have been considered and rejected is contained within the Spatial Strategy Topic Paper, Preferred Options Consultation Document and IIA.   |
| The housing supply includes a small supply buffer, and the Council can demonstrate a Five Year Housing Land Supply which will be monitored through the Authority Monitoring Report throughout the Plan period. Housing figures are 'around' and allow for more units to come forward if sites can accommodate them in a sustainable manner. For these reasons no further housing allocations are required. |
| The Housing Trajectory and timings within it are considered deliverable as established through the Council's Five Year Housing Land Supply Methodology (April 2024). The Trajectory is updated annually, and the Pre-Submission Local Plan uses the latest available Housing Site Schedule (April 2024).   |
| The site allocations, with the addition of existing permissions and windfall sites as set out in the April 2024 Housing Site Schedule, creates a good range of site sizes to assist in delivery of sites to meet housing needs over the Plan period.   |



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| The Council can meet its development requirements without needing to undertake a Green Belt review. This approach accords with National Planning Guidance.  |
| The 'small sites' (under 1ha) are an important part of the Plan to ensure delivery of a variety of sites in a timely manner, and to meet NPPF requirements to provide 10% of small sites. The enlargement of these sites would be likely to put greater pressure on local facilities and infrastructure which could make such sites unsuitable for development.   |
| Policy DM1 has been amended to introduce a new requirement for 10% market housing for Older Persons on greenfield sites of more than 500 dwellings.   |
| There is no requirement or local need for the Plan to include a co-living policy.   |
| The employment allocations alongside existing commitments are expected to meet the identified employment needs. The use of 'around' employment floorspace figures in specific site allocation policies allows for an appropriate degree of flexibility in provision. DM4 protects, and allows for expansion of, existing employment uses – the Plan should be read a whole, so it is not necessary to repeat in Policy S7.  |
| Suitable brownfield sites have been allocated within the Urban Area. There are not sufficient brownfield sites to meet the Local Plan's development requirements so greenfield sites must be allocated.   |
| The requirement for Masterplans for strategic sites and SPAs goes beyond just land use and ownership and are required to ensure wider community and stakeholder engagement at an early stage of the planning process. Reference to these being approved before a planning application is submitted has been amended to require them to be approved before a planning application is determined. It is noted that a masterplan for ARU was approved in 2024.   |
| Policies DM8 and DM11 provide support for the growth and expansion of rural businesses – no need to add further details to Strategic Policies.  |
| The SHELAA has been updated to inform the Pre-Submission Local Plan and any appropriate changes or updates have been made.  |
| It is not necessary to allocate specific sites for renewable energy production as the suite of policies within the Plan allow for such developments to come forward. A number of planning applications for such large-scale development, including a large DCO for 'Longfield Solar Farm' have been approved in the Council's administrative area, demonstrating that the policies are sufficient to allow for such development to come forward and that there is no specific need to allocate sites. |
| See relevant site allocation policies for responses to site specific comments.  |
| The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.   |

CCC responses to site allocation consultation comments appear under the relevant specific site policy. For example, see page 112 for CCC responses to Hammonds Farm (SGS16a).

### Strategic Policy S8 - Delivering Economic Growth

Key statistics:

| Consultation point | Yes | No | Comments | Total number of responses |
|--------------------|-----|----|----------|---------------------------|
|--------------------|-----|----|----------|---------------------------|

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|---|---|---|----|----|
| Strategic Policy 8 - Delivering Economic Growth | 8 | 1 | 22 | 22 |
|---|---|---|----|----|

Summary of Representations – main issues and suggested changes:

- Policy is broadly supported (Gladman, C J H Farming Ltd, Van Diemans Property Company, Wates Development and Hammonds Estates LLP)
- Bullet 1 should also refer to active modes of transport (Essex County Council)
- Add a new bullet supporting regional growth sector priorities and clustering of economic activity (Essex County Council)
- Add reference in para 6.58 to the need for an appropriate mix of uses to reflect market need (Essex County Council)
- Amend para 6.59 to remove the reference to South East Local Enterprise Partnership and include a reference to the Local Skills Improvement Plan (Essex County Council)
- Paragraph 6.62 should refer to the importance of the strategic sites and Garden Communities creating the agglomeration for economic development (Essex County Council)
- Reference ECC’s Developers Guide to infrastructure contributions in the Reasoned Justification. Para 6.63 should reflect the need for Employment and Skills Plans to be agreed by the LPA and ECC ahead of agreeing S.106 Agreements (Essex County Council)
- Concerns expressed that the SGS15 scored lowest in average sustainable accessibility in the Transport Impact Appraisal (Chignal Parish Council)
- In accordance with the NPPF and PPG, the policy should be amended to reference the logistics sector (Greystoke CB)
- Additional smaller employment sites should be allocated to further diversify Chelmsford’s economy (Hill Farm (Chelmsford) Ltd, Van Diemans Property Company)
- Add an additional bullet to refer to low carbon transport infrastructure (CNG Fuels Ltd)
- The South East Marine Plan policies such as SE-EMP-1 should be used as evidence to support the local plans policies (Marine Management Organisation).

| <b>CCC response to the comments made</b>  |
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| Various amendments to strengthen and update the policy including references to active and sustainable modes of transport and support for regional growth sector priorities and clustering of economic activity. |
| The policy includes B8 development as stated in Reasoned Justification – no further change considered necessary.  |
| Additional references to the South East Marine Plan have been added to Section 1 (Introduction) of the plan. As the plan is read as a whole, it is not considered necessary to repeat this in Policy S8.        |
| The policy already refers to the sectors which will be nurtured - reiterating this in the Reasoned Justification in relation to strategic sites would be duplication.   |

The plan will allow for a range of different employment uses to come forward, where appropriate – there is no evidence to justify a specific reference to low carbon transport infrastructure.

The policy for SGS15 Little Boyton Hall Farm requires a range of measures to promote active travel safe to the site.

The plan allocates a range of employment sites to meet the employment floorspace requirements in the Policy S6 – no further allocations required.

### Strategic Policy S16 – Connectivity and Travel

Key statistics:

| <b>Consultation point</b>                     | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---|------------|-----------|-----------------|----------------------------------|
| Strategic Policy 16 – Connectivity and Travel | 14         | 2         | 26              | 26                               |

Summary of Representations – main issues and suggested changes:

- Support for the policy (Essex County Council, Sport England, Wates Developments and Hammonds Estates LLP, Cliffords Group Ltd, Dandara / Dandara Eastern, Gladman Developments Ltd, Hill Residential, Dominus Chelmsford Ltd, CJH Farming Ltd, The Bucknell Family, Chris & Helen Copping, Pigeon (Sandon) Ltd, Daniel James Developments)
- Welcome further text relating to Bio/CNG and alternative fuels (CNG Fuels)
- Add a reference to how the policy can support the LCWIP routes through physical provision or financial contributions (Essex County Council)
- Include actions to remove barriers to travel for vulnerable users (Essex County Council)
- Encourage the plan to take account of the challenging targets for mode share and road safety as already in place in London (Transport for London)
- Walkable neighbourhood principles may not always be achievable, particularly for logistics development (Greystoke CB)
- Clarification sought on definition and thresholds for major and strategic development (ARU)
- Add reference to development proposals having regard to the principles in Active Design as well as the Essex Design Guide as the Walkable Communities Principle provides guidance on practical measures for implementing walkable neighbourhoods (Sport England)
- Include reference to the modal hierarchy, distinguish between the bullets points in Part A and clarify alternatives for commercial vehicles (Wates Developments and Hammonds Estates LLP)
- Concerns about future traffic and impact on Great Baddow and the Baddow bypass
- There needs to be greater provision for disabled parking close to the shops in the City Centre, and better public transport
- Better public transport is needed particularly from Chelmer Village to Springfield and Beaulieu Park.

| <b>CCC response to the comments made</b>   |
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| Strategic Policy S1 includes the modal hierarchy – the plan should be read as a whole, so it is not necessary to repeat it in Policy S16.      |
| The bullet points under Section A seek to achieve different measures to achieve active and sustainable transport and are retained.             |
| Reasoned Justification describes alternatives for commercial vehicles – no further change considered necessary.                                |
| Reasoned justification amended to include a wider definition of vulnerable users.  |
| Reference to how development can support the delivery of LCWIP routes added to the Reasoned Justification.                                     |
| The definition and thresholds for major and strategic development in the policy are appropriate – no further change considered necessary.      |
| Reference to the London Plan is noted. The Chelmsford Local Plan includes targets for mode share and seeks to improve safety and connectivity. |
| Reference added to development proposals having regard to the principles in Active Design.   |
| Walkable neighbourhood principles are already addressed adequately in the policy – no further change considered necessary.                     |

### Strategic Policy S9 – Infrastructure Requirements

Key statistics:

| <b>Consultation point</b>                        | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Strategic Policy 9 – Infrastructure Requirements | 23         | 3         | 48              | 48                               |

Summary of Representations – main issues and suggested changes:

- Support for the policy (Sport England, Environment Agency, Gladman, Anglian Water, Tritton Farming Partnership LLP, Dominus Chelmsford Limited, Whirledge and Nott, Croudace Homes, Vistry Group)
- The list of transport infrastructure measures should better reflect the correct user hierarchy prioritisation of sustainable modes (Wates Developments and Hammonds Estates LLP)
- The policy fails to specifically address the potential impacts of sites 16a and 16b on Danbury, combined with planned housing growth in Maldon, South Woodham Ferrers and Danbury, and the potential new power station. Modelling has already shown that mitigation is needed for Eves Corner and Well Lane junctions, without additional growth (Danbury Parish Council)
- Add active and sustainable travel to education and health facilities (Essex County Council)
- Separate Chelmsford North East Bypass and new Park and Ride sites bullets, refer to bypass phasing and future actions, and separate bus priority and inter-urban public transport bullets (Essex County Council)
- Update route-based strategies for the A414 and A132, including requirements for physical or financial contributions where development adds traffic (Essex County Council)

- Provide evidence to support the strategy for the A132, it is close to capacity and improvements may not deliver the required improvements
- Support principle of a sustainable bridge connection from Site 16a directly into Sandon Park and Ride but some qualifying text is needed (Wates Developments and Hammonds Estates LLP)
- There are opportunities to improve the National Cycle Network in the area, namely improvements to NCN1 and an additional route the junction 19 which would link to Beaulieu Station and North Chelmsford, as well as providing a link to the countryside for leisure cyclists and is a better alternative to the existing cycle route (Cycling UK)
- Would not support buses through the Park and Ride site, and would prefer a connection nearby (Essex County Council)
- The supporting text refers to new development creating demand for cycling, rail and road use only. The wording should be updated to include reference to walking and buses (Wates Developments and Hammonds Estates LLP)
- Clarify the supporting text to evidence the requirement and timing for the Chelmsford North East Bypass (CNEB) Phases 1b and 2. The requirement appears to be associated primarily with background increases in traffic using the A12, rather than trips from Hammonds Farm (Wates Developments and Hammonds Estates LLP).
- Support for the conclusion of the Transport Impact Appraisal of Preferred Spatial Approach (March 2024) that by maximising the potential for sustainable accessibility to and from the site along the A12 corridor, the impact on the strategic highway network should not be considered severe – rather than a requirement to ensure that background traffic flows along the A414 are not unreasonably delayed by the addition of development trips as stated elsewhere in the appraisal (Wates Developments and Hammonds Estates LLP)
- Include a reference to the Chelmer Waterside access bridge, to be consistent with Strategic Policy S17 (Essex County Council)
- The Army and Navy improvements are wider than the junction itself and include connecting routes (Essex County Council)
- Further assessment work is underway on some road locations, and we will work with the Council on appropriate mitigation if necessary (Highways England)
- Any new Park and Ride site for West Chelmsford should be outside the Green Belt (Writtle Parish Council)
- There is a need for joint working between South Essex authorities to improve sustainable travel connectivity north-south, particularly for access to jobs; and to address implications and opportunities arising from Thames Freeport (Castle Point Council)
- Changes to the strategic road network should be considered in the context of potential impacts on the wider network, including the A12 in London (Transport for London)
- Concerns about future traffic and impact on Great Baddow and the Baddow bypass
- Add provision of 5G mobile service to the utilities section (Essex County Council)

- Encourage opportunities to enhance and establish green infrastructure along sustainable transport and the Public Rights of Way networks (Essex County Council)
- Include a policy reference to incorporating urban greening (Natural England)
- Strengthen reference to the capacity of foul drainage and waste water treatment to address pollution prevention (Chelmsford & Central Essex RSPB Local Group)
- Add further text relating to low carbon refuelling facilities (CNG Fuels)
- Rephrase policy to be consistent with Policy DM16, and to clarify that bespoke mitigation measures, where appropriate, would be in addition to RAMS contributions (Natural England).
- Add references to the requirement for a range of developer funded police facilities to provide for effective community safety, cohesion and policing to create sustainable new communities (Essex Police)
- The Cathedral School is at full capacity and would need to expand to two form entry to meet demand, but a strategic approach is required to include independent schools in overall longer-term education planning and funding as part of a cohesive strategy (The Cathedral School)
- All the required infrastructure should be set out in each site policy to make it clearer what they are expected to provide (Dandara, Hill Residential Ltd) and clearly linked to proposed growth
- It is unclear how infrastructure will be delivered, implemented and funded (Higgins Group)
- Policy should address the need to mitigate impacts on primary, community, acute and ambulance service capacity (Mid and South Essex Integrated Care Board (ICB))
- Lack of hospital capacity, with sufficient car parking, and GP capacity is an issue
- If we cannot provide the infrastructure, we should not build the houses and there should be legal requirements to ensure that schools, GPs, cycle routes, bus lanes are provided
- Evidence documents refer to uncertainty in forecasting forward beyond 2041 and therefore do not test more than 3,000 dwellings at East Chelmsford Garden Community (Hammonds Farm) (Wates Developments and Hammonds Estates LLP).

| <b>CCC response to the comments made</b>  |
|---|
| It is not necessary to list transport infrastructure by order of the modal hierarchy – no further change considered necessary.  |
| Cross-boundary issues related to sustainable travel connectivity north-south, and to address Thames Freeport are addressed in Section 1 of the plan (or Introduction) – the plan should be read as a whole, so it is not necessary to repeat them here. |
| Qualifying text relating to the bridge connection from Site 16a is provided in the site policy (SGS16a).  |
| Reasoned Justification refers to new development creating demand for measures to encourage sustainable travel choices which includes for walking and buses.   |
| Reasoned Justification amended to reflect the latest position regarding the funding for the Chelmsford North East Bypass (CNEB). With section 1a being funded by the Housing Infrastructure Fund, followed by section 1b and section 2,                 |

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| <p>which are anticipated to be subject to a future round of Department for Transport/Major Road Network funding combined with developer contributions and will be delivered at a later date.</p>   |
| <p>Reference to 'emergency services infrastructure' replaced with "Police, ambulance and fire and rescue facilities" for completeness. Adding additional references to policing and police facilities would add unnecessary duplication.</p>   |
| <p>Requirements for developer funded police facilities is addressed in the Infrastructure Delivery Plan and such detail is not appropriate within a Strategic Policy – no further change considered necessary.</p>   |
| <p>Policy already contains a specific section on utilities which includes foul drainage and waste water treatment. Requirements for utilities is addressed in the Infrastructure Delivery Plan and relevant site allocation policies informed by the Water Cycle Strategy including SGS7a– no further change considered necessary.</p> |
| <p>It is not necessary to list other examples of sites that Beaulieu Park rail station will encourage sustainable travel to – no further change considered necessary.</p>  |
| <p>The requirement for 'Improvements to the Improvements to the Army and Navy Junction' has been expanded to include the routes connecting to the junction as part of a sustainable transport package.</p>   |
| <p>For completeness, reference to the A1016 has been added to 'New foot/cycle bridge across A131'.</p>   |
| <p>Reference to new and improved active and sustainable travel routes has been expanded to include reference to 'bridges' to reflect additional items identified by the updated IDP. The need for such routes to connect to education and health centres has also been added to this bullet point.</p>                                 |
| <p>The need for a new active and sustainable route and bridge over the A12 from East Chelmsford Garden Community to connect to Sandon Park and Ride has been amended to connect 'close' to the Park and Ride.</p>  |
| <p>Reasoned Justification amended to refer to 5G mobile connectivity.</p>  |
| <p>The requirement for bus priority measures has been expanded to also include 'bus services' and has been separated into two bullet points from the requirement for 'Improvements to inter-urban public transport'.</p>   |
| <p>Measures to promote the greening of sustainable transport and Public Rights of Way is outside the scope of this Policy and is addressed by Policy S4 – no further change considered necessary.</p>  |
| <p>Reasoned Justification updated to reflect the latest position with regards to the CNEB, Route Based Strategies for Mid Essex and Local Transport Plan.</p>  |
| <p>The provision of new lock and replacement of weir gates at Chelmer Waterside, the provision of serviced moorings along the River Chelmer, and cemetery space and crematorium provision have been added to the policy requirements to reflect additional items identified by the updated IDP.</p>                                    |
| <p>The IDP sets out how infrastructure will be delivered, implemented and funded so it is not necessary to repeat this detail in the policy - no further change considered necessary.</p>  |
| <p>Contributions towards addressing cumulative recreational pressure on SSSIs has been added as a policy requirement to reflect the site specific policies requiring this.</p>   |
| <p>Reasoned Justification updated to require major developments to provide suitable alternative and accessible natural greenspace on-site, in addition to financial contributions in accordance with the adopted RAMS Supplementary Planning Document.</p>   |

## Strategic Policy S10 – Securing Infrastructure and Impact Mitigation

Key statistics:

| <b>Consultation point</b>   | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---|------------|-----------|-----------------|----------------------------------|
| Strategic Policy 10 – Securing Infrastructure and Impact Mitigation | 11         | 2         | 28              | 28                               |

Summary of Representations – main issues and suggested changes:

- Supportive of the policy (Environment Agency, Anglian Water, Vistry Group, Chelmsford Garden Community Consortium, Essex County Council, NHS Property Services Ltd, Wates Developments and Hammonds Estates LLP)
- Include reference to ‘facilities’ within the policy and Reasoned Justification (Essex Police)
- Include reference to green and ‘blue’ infrastructure (Essex County Council)
- Amend ‘emergency services’ to ‘police, ambulance and fire and rescue facilities’ (Essex Police)
- Delete second policy paragraph as it should not be for a development, especially for one that has been allocated in the local plan, to subsequently demonstrate that there is sufficient capacity within local infrastructure to support that development (Home Builders Federation)
- Any reliance placed on planning obligations to fund infrastructure need to consider how much growth is being directed to locations that relate to such infrastructure, and whether such growth is sufficient to provide the requisite funding (Tritton Farming Partnership LLP)
- New housing sites necessitate developer funded police and healthcare facilities to be provided. Further changes are set out by Essex Police throughout the Plan (Essex Police, Mid and South Essex Integrated Care Board)
- Policies S9 and S10 should address the need to mitigate impacts on primary, community, acute and ambulance service capacity (Mid and South Essex Integrated Care Board)
- Greater clarity is sought within the evidence base with regards to specific details on the infrastructure being required for each site and how that will be secured. At present there is no link between Policy S9 and Policy S10 which should explain which infrastructure is relevant to which site and how delivery will be secured (Whirlledge & Nott, Croudace Homes)
- Include reference to the fact the IDP is a living document that will continue to be updated in the Reasoned Justification (Essex County Council)
- Supportive of the reference to ‘flood protection’ in the Reasoned Justification (Environment Agency).

### **CCC response to the comments made**

Last sentence of the policy regarding the need to ensure that the cumulative impact of planning policy, standards and infrastructure requirements do not render most sites and development identified in the Local Plan unviable and therefore undeliverable has been moved to the Reasoned Justification.



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| Definition of infrastructure expanded to include green and 'blue' infrastructure.   |
| Reasoned Justification expanded to clarify that the Infrastructure Delivery Plan is a 'living' document that will be reviewed to ensure the most up-to-date information is used to inform the planning application process. |
| All site allocation policies have been updated to clarify that financial contributions for infrastructure listed in the site policy and Policy S9 will be sought in accordance with Policy S10.                             |

### Strategic Policy S11 – The Role of the Countryside

Key statistics:

| <b>Consultation point</b>                         | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---|------------|-----------|-----------------|----------------------------------|
| Strategic Policy 11 – The Role of the Countryside | 8          | 4         | 29              | 29                               |

Summary of Representations – main issues and suggested changes:

- Support policies which prevent development on the land between the A12 Bypass and the Green Belt, even if the Green Belt boundary changes (Essex Local Access Forum)
- Preserve agricultural land within the Green Belt between Chelmsford and south of the A12 as a breathing space for inhabitants
- Amend policy to align with Council's response to the climate and ecological emergency to add significant material weight to developments that assist in delivering net zero emissions (CNG Fuels)
- Add more protection for the rural villages to prevent encroachment from larger settlements (Sandon Parish Council)
- Undertake a Green Wedge review (The Bucknell Family, Cliffords Group Ltd, Vistry Group, Obsidian Strategic Asset Management Ltd, Miscoe Enterprises Ltd and Hill Farm (Chelmsford) Ltd)
- Policy should be more flexible to allow sustainable development to come forward outside of defined built-up areas (Gladman Developments Ltd)
- Support principle of Green Wedges but no need for a specific Green Wedge Policy (Obsidian Strategic Asset Management Ltd)
- Support reference to Landscape Character Assessments, Historic Landscape Characterisation Study, Sensitivity and Capacity Assessments evidence base (Chignal Parish Council)
- Support policy (Writtle Parish Council)
- Question whether all areas of Green Belt serve the five key purposes as the context and role of these areas has evolved, particularly, land south of Chelmsford (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- A Green Belt Review should be undertaken (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Newell Properties Development Ltd, Hill Residential Ltd, Vistry Group, Higgins Group)

- Amend to refer to the Essex Green Infrastructure Strategy (2020) and the Essex Green Infrastructure Standards Technical Guidance, Essex Green Infrastructure Standards Non-Technical Guidance and the Local Nature Recovery Strategy (Essex County Council)
- Suggests policy wording in relation to rural economic development, with particular regard to existing businesses in rural locations, is clarified and more supportive of growth, expansion and diversification to avoid different interpretations at planning application stage (Strutt and Parker)
- Consider a small-scale alteration to the Green Wedge boundary and an extension to Widford Employment Area (Saxtons 4x4)
- Comments from landowners/developer suggesting alternative development sites are taken forward.

| <b>CCC response to the comments made</b>   |
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| Plan seeks to prevent the encroachment of growth into undeveloped areas and the coalescence of existing built-up areas – no further changes needed.  |
| Development growth in the Green Belt has been discounted as there is sufficient and suitable land is available outside the Green Belt to meet the development needs in a sustainable way. It would also undermine national planning policy. A Green Belt Review is not required.   |
| The Green Wedge is a locally important designation. Changes to the Green Wedge boundaries to allow development growth has been discounted as there is sufficient and suitable land elsewhere to meet development needs in a sustainable way. No Green Wedge Review is required, and the deletion of Green Wedge policies would be inappropriate. |
| Other policies in the plan adequately deal with net zero carbon, Green Wedge and Rural Area development including DM8 and DM31. The plan should be read as a whole, so further provision in S11 would be duplication.  |
| CCC has prepared its own Green Infrastructure Strategy and Action Plan for the plan area – it is not necessary to also refer to the Essex-wide documents.  |
| Reasoned Justification amended to clarify that reference is made to the spatial role and function of land.   |
| A range of alternative development sites have been considered and rejected when developing the Spatial Strategy. More information is set out in the IIA, Spatial Strategy Topic Paper and Preferred Options Local Plan.  |

### Strategic Policy S12 – Role of City, Town and Neighbourhood Centres

Key statistics:

| <b>Consultation point</b>   | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---|------------|-----------|-----------------|----------------------------------|
| Strategic Policy S12 – Role of City, Town and Neighbourhood Centres | 0          | 0         | 3               | 3                                |

Summary of Representations – main issues and suggested changes:

- Support the distinction of centres with Chelmsford City Centre listed first (which is contrary to Policy S7) (Dominus Chelmsford Limited)
- Consider adding Hammonds Farm Neighbourhood Centre to the list of centres identified in para. 6.125 (Essex County Council)
- The policy lacks a reference to the benefits of/need for appropriate residential uses on upper floors in the city centre/designated centres (Dominus Chelmsford Limited/ Highgate Capital Limited).

| <b>CCC response to the comments made</b> |
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| As Hammonds Farm has not yet been built, the exact scale and location of a neighbourhood centre is currently unknown, so no change is proposed. |
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| Strategic Policy S17 adequately covers the opportunities for residential uses on upper floors in Part C: Living in the City Centre. Residential use on the upper floors of designated centres is also covered by Policy DM5. |
|--|

### Strategic Policy S17 – Future of Chelmsford City Centre

Key statistics:

| <b>Consultation point</b>                               | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---|------------|-----------|-----------------|----------------------------------|
| Strategic Policy S17 – Future of Chelmsford City Centre | 6          | 1         | 9               | 9                                |

Summary of Representations – main issues and suggested changes:

- Proposals for flood defences and flood management are welcome. The supporting text could include encouragement for developers to liaise with the Chelmsford Flood Resilience Partnership (The Environment Agency)
- Support for innovative and sustainable approaches, long-term resilience, nature-based solutions and natural flood management (Anglian Water Services Ltd)
- Support for policy approach, and specifically for The Meadows with some enhancements to text proposed (Dominus Chelmsford Limited)
- Amend text to refer to Park and Ride as part of bus connections (Essex County Council)
- Opportunity corridors supported – suggest amendment to reflect availability of planning tool for urban greening, and provide clarification of appropriate land uses (Essex County Council)
- The Meadows was only built in 1992 and does not need to be rebuilt, the proposal is unsustainable
- Proposals for The Meadows should include health facilities.

| <b>CCC response to the comments made</b> |
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| The policy has been redrafted to reduce its length and remove repetition. Detail that was contained within Part F. is now largely contained in the relevant site policies SGS1a and SGS1w. |
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| Part D. Bullet 2, reference to Park and Ride has been added. |
|--|

Figure 15, Area 5, has been updated to include the allocation of Andrews Place (SGS1cc).

Reference to the Chelmsford Flood Resilience Partnership is made in Strategic Policy S9. The plan should be read as a whole, so further provision in S17 would be duplication.

### Strategic Policy S13 – Monitoring and Review

Key statistics:

| <b>Consultation point</b>                    | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Strategic Policy S13 – Monitoring and Review | 4          | 0         | 6               | 6                                |

Summary of Representations – main issues and suggested changes:

- Support for policy (Richborough, Vistry Group, Higgins Group, Hill Residential Group, Gladman)
- Add a commitment for the future review to be completed and adopted within five years to ensure a rolling up-to-date Local Plan (Richborough)
- A full review is always necessary over a focussed review (Hill Residential Ltd).

#### **CCC response to the comments made**

No changes have been made as the policy meets the necessary requirements and sets a date for a future review.

## Where Will Development Growth be Focused?

This section of the consultation document provides the site policies for delivering the Spatial Strategy.

### Section 7 – Where Will Development Growth be Focused? (Paragraph 7.1 to 7.6)

| <b>Consultation point</b>  | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Section 7 - Where Will Development Growth be Focused? (Paragraph 7.1 to 7.6) | 0          | 0         | 3               | 3                                |

Summary of Representations – main issues and suggested changes:

- Recommend policy wording relating to the capacity of water recycling centres is included in all site allocation policies (Environment Agency)
- Suggest adding reference to police facilities (Essex Police)
- Suggest change to the name of this area to better reflect its location (Dominus Chelmsford Limited).

| <b>CCC response to the comments made</b>  |
|---|
| Reference to the capacity of water recycling centres added to the relevant policies for affected sites at SGS7 and SGS10. |
| Plan text adjusted to refer to emergency services facilities.   |

### Growth Area 1 – Central and Urban Chelmsford (paragraph 7.7-7.11 and Figure 16)

Key statistics:

| <b>Consultation point</b>                                  | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Chelmsford Urban Area (paragraph 7.7 - 7.11 and Figure 16) | 2          | 0         | 11              | 11                               |

Summary of Representations – main issues and suggested changes:

- Support the approach to use brownfield land (Basildon Borough Council), the role of this area in the strategy (Gladman) and the opportunity for green/blue and natural infrastructure (Anglian Water Services Ltd)
- Suggest additional wording to ensure early discussions with developers (Anglian Water Services Ltd)
- Suggested wording changes to reflect education provision and delivery, and provision of bus services (Essex County Council)
- Additional site proposed for consideration for a co-living scheme (Highgate Capital Limited)
- Opposed to removal of car parks to allow for development

- Concern for the level of public service provision and securing promised infrastructure.

| <b>CCC response to the comments made</b>  |
|---|
| Support to using brownfield land noted.   |
| Wording has been altered throughout Section 7 to clarify land and provision of primary and early years and childcare facilities, where this is a site policy requirement.   |
| Contributions for bus services may not always be appropriate, depending on location, so this is covered through the requirement for development to maximise opportunities for active and sustainable travel for relevant site policies.   |
| Plan is supported by an updated evidence base including an updated Infrastructure Delivery Plan.  |
| Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes. |

#### Location 1 – Chelmsford Urban Area (paragraph 7.12)

Key statistics:

| <b>Consultation point</b>              | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Chelmsford Urban Area (paragraph 7.12) | 0          | 0         | 1               | 1                                |

Summary of Representations – main issues and suggested changes:

- Suggest wording changes to reflect opportunities for active and sustainable travel (Essex County Council).

| <b>CCC response to the comments made</b>                      |
|---|
| Reference to active and sustainable travel has been included. |

#### Strategic Growth Site Policy 1a - Chelmer Waterside

Key statistics:

| <b>Consultation point</b>                           | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---|------------|-----------|-----------------|----------------------------------|
| Strategic Growth Site Policy 1a - Chelmer Waterside | 4          | 0         | 9               | 9                                |

Summary of Representations – main issues and suggested changes:

- Clarification sought on costs of any relocation and adequacy of width of waterside margin (Chelmsford Canoe Club)
- Suggest adding reference to police facilities (Essex Police)
- Early engagement will be required on sewer constraints (Anglian Water Services Ltd)

- Amend text to include a flood risk and management requirement and potential financial contributions (Environment Agency)
- Add reference to the role of multifunctional green infrastructure in water management (Essex County Council)
- The Cathedral School is at full capacity and would need to expand to meet demand, and a strategic approach is required (The Cathedral School)
- Additional site proposed for consideration in the allocation area, for co-living scheme (Highgate Capital Limited).

| <b>CCC response to the comments made</b>  |
|---|
| Reference added in the Reasoned Justification to the presence of a large diameter sewer through site CW1d.  |
| The Policy and the Reasoned Justification have been adjusted to refer to facilities alongside infrastructure, and to police, ambulance and fire and rescue. |
| An additional bullet has been added for the requirement for financial contributions towards provision of a new lock and replacement weir gates.             |
| Flood risk is covered within the Policy and at Para. 7.15.  |
| CCC will continue to work closely with ECC as the Local Education Authority on the plan to ensure that education requirements are met.                      |

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

Key statistics:

| <b>Consultation point</b>  | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Strategic Growth Site Policy 1w – Meadows Shopping Centre and Meadows Surface Car Park | 1          | 3         | 14              | 14                               |

Summary of Representations – main issues and suggested changes:

- Additional text suggested in relation to education contributions, parking, pedestrian and cycle routes (Essex County Council)
- A Heritage Impact Assessment should be undertaken before the next consultation stage (Historic England)
- Amend text to include a flood risk and management requirement and potential financial contributions (Environment Agency)
- Suggest adding reference to police facilities (Essex Police)
- Consider sewer assets and easements, and the need for maintenance access, which should shape the layout (Anglian Water Services Ltd)
- Consider on-site health care facilities to meet growing needs (Mid and South Essex Integrated Care Board)
- Support allocation but propose greater development density and a higher number of homes (Dominus Chelmsford Limited)
- Do not agree with building homes here, it is not a sustainable option to demolish it

- Opposed to the removal of car parks to allow for development, and active travel should feature
- Concerns expressed about loss of shops and jobs, the centre has good occupancy and could be revamped for shopping
- Proposals for The Meadows should include health and education facilities.

| <b>CCC response to the comments made</b>  |
|---|
| Additional bullet added to the Policy and Reasoned Justification to require safeguarding of access for maintenance of foul and surface water drainage infrastructure, and the presence of a wastewater pumping station on the site.   |
| Flood risk is covered within the Policy and through a link to Policy S10 at Para. 7.40.   |
| Clarification made to bullet relating to loss of car parking, and enhancement of bus services.  |
| An additional bullet has been added for the requirement for financial contributions towards provision of a new lock and replacement weir gates.   |
| The Policy and Reasoned Justification adjusted to refer to facilities alongside infrastructure, and to police, ambulance and fire and rescue.   |
| The site policy requires financial contributions to education provision and/or onsite provision of other community facilities including healthcare provision.   |
| The site policy requires proposals to seek to retain an equivalent amount of commercial floorspace compared to the existing shopping centre.  |
| Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes. |

#### Strategic Growth Site Policy 1b – Former St Peter’s College, Fox Crescent

Key statistics:

| <b>Consultation point</b>   | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---|------------|-----------|-----------------|----------------------------------|
| Strategic Growth Site Policy 1b – Former St Peter’s College, Fox Crescent | 1          | 0         | 9               | 9                                |

Summary of Representations – main issues and suggested changes:

- Support for the policy requirement to provide or make financial contributions to sport, leisure and recreation facilities, and for commuted sums in lieu of loss of open space (Sport England)
- Add reference to police facilities (Essex Police)
- Add reference to specialised supported housing (Essex County Council)
- Change wording relating to how special schools are referred to (Essex County Council)
- Add additional text in relation to green infrastructure (Essex County Council).

| <b>CCC response to the comments made</b> |
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|---|
| The Policy and Reasoned Justification have been adjusted to refer to facilities alongside infrastructure, and to police, ambulance and fire and rescue. |
| An additional bullet has been added to outline the requirement for inclusion of 60 units of specialist residential housing.                             |
| Bullet 3 - the wording around special schools has been clarified.   |
| Text added in relation to green infrastructure.   |

Strategic Growth Site Policy 1x – Former Kay Metzeler Premises, Brook Street

Key statistics:

| Consultation point   | Yes | No | Comments | Total number of responses |
|--|-----|----|----------|---------------------------|
| Strategic Growth Site Policy 1x – Former Kay Metzeler Premises, Brook Street | 2   | 0  | 7        | 7                         |

Summary of Representations – main issues and suggested changes:

- The Cathedral School is at full capacity and would need to expand to meet demand, and a strategic approach is required (The Cathedral School)
- A Heritage Impact Assessment should be undertaken before the next consultation stage (Historic England)
- Add a reference to police facilities (Essex Police)
- Consider sewer assets and easements, and the need for maintenance access, which should shape the layout (Anglian Water Services Ltd)
- Add additional text in relation to green infrastructure and nature recovery networks (Essex County Council).

|   |
|---|
| <b>CCC response to the comments made</b>                                    |
| This site is no longer available for development and will not be allocated. |

Strategic Growth Site Policy 1d – Riverside Ice and Leisure Land, Victoria Road

Key statistics:

| Consultation point  | Yes | No | Comments | Total number of responses |
|---|-----|----|----------|---------------------------|
| Strategic Growth Site Policy 1d – Riverside Ice and Leisure Land, Victoria Road | 2   | 0  | 11       | 11                        |

Summary of Representations – main issues and suggested changes:

- The Cathedral School is at full capacity and would need to expand to meet demand, and a strategic approach is required (The Cathedral School)
- Amend text to include flood risk and management requirement and potential financial contributions (Environment Agency)
- Suggest adding reference to police facilities (Essex Police)

- Consider sewer assets and easements, and the need for maintenance access, which should shape the layout (Anglian Water Services Ltd)
- Add additional text in relation to pedestrian and cycle links, and active and sustainable travel (Essex County Council)
- Opposed to the removal of car parks to allow for development.

| <b>CCC response to the comments made</b>  |
|---|
| Additional bullet added to the Policy to require safeguarding of access for maintenance of foul and surface water drainage infrastructure, and the presence of a wastewater pumping station on the site.  |
| Additional bullet added to the Policy to require provision of SuDs and flood risk management.   |
| The Policy and Reasoned Justification have been adjusted to refer to facilities alongside infrastructure, and to police, ambulance and fire and rescue.   |
| An additional bullet has been added for the requirement for financial contributions towards provision of a new lock and replacement weir gates.   |
| CCC will continue to work closely with ECC as the Local Education Authority on the plan to ensure that education requirements are met.  |
| Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes. |

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

Key statistics:

| <b>Consultation point</b>   | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---|------------|-----------|-----------------|----------------------------------|
| Strategic Growth Site Policy 1e – Civic Centre Land, Fairfield Road | 0          | 0         | 5               | 5                                |

Summary of Representations – main issues and suggested changes:

- Add reference to police facilities (Essex Police)
- Consider sewer assets and easements, and the need for maintenance access, which should shape the layout (Anglian Water Services Ltd)
- Add additional text in relation to active and sustainable travel, and Chelmsford Transport Interchange Project (Essex County Council)
- Opposed to the removal of car parks to allow for development.

| <b>CCC response to the comments made</b>  |
|---|
| Additional bullet added to the Policy to require safeguarding of access for maintenance of foul and surface water drainage infrastructure.              |
| The Policy and Reasoned Justification have been adjusted to refer to facilities alongside infrastructure, and to police, ambulance and fire and rescue. |
| A proposed Chelmsford Transport Interchange Project is considered to be at too early a stage to be included in this iteration of the Plan.              |

Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes.

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

Key statistics:

| Consultation point  | Yes | No | Comments | Total number of responses |
|---|-----|----|----------|---------------------------|
| Strategic Growth Site Policy 1f – Eastwood House Car Park, Glebe Road | 0   | 0  | 5        | 5                         |

Summary of Representations – main issues and suggested changes:

- Add additional text in relation to green infrastructure and nature recovery networks (Essex County Council)
- Consider sewer assets and easements, and the need for maintenance access, which should shape the layout (Anglian Water Services Ltd)
- Add reference to police facilities (Essex Police)
- Opposed to the removal of car parks to allow for development.

#### **CCC response to the comments made**

Additional bullet added to the Policy to require safeguarding of access for maintenance of foul and surface water drainage infrastructure.

The Policy and Reasoned Justification have been adjusted to refer to facilities alongside infrastructure, and to police, ambulance and fire and rescue.

Text added in relation to green infrastructure.

Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes.

### Strategic Growth Site Policy 1y – Land Between Hoffmanns Way and Brook Street (Marriages Mill)

Key statistics:

| Consultation point   | Yes | No | Comments | Total number of responses |
|--|-----|----|----------|---------------------------|
| Strategic Growth Site Policy 1y – Land Between Hoffmanns Way and Brook Street (Marriages Mill) | 2   | 0  | 5        | 5                         |

Summary of Representations – main issues and suggested changes:

- Add additional text in relation to green infrastructure and nature recovery networks (Essex County Council)

- Add reference to police facilities (Essex Police)
- Include reference to removal of modern buildings and retaining a link to the nearby Grade II listed Marconi 1912 Building (Historic England)
- The Cathedral School is at full capacity and would need to expand to meet demand, and a strategic approach is required (The Cathedral School).

| <b>CCC response to the comments made</b>   |
|--|
| The Policy and Reasoned Justification have been adjusted to refer to facilities alongside infrastructure, and to police, ambulance and fire and rescue.                      |
| Text added in relation to green infrastructure.  |
| Bullets under 'historic and natural environment' amended to include the requirement for the removal of modern buildings, and retaining a visual link with the 1912 Building. |
| CCC will continue to work closely with ECC as the Local Education Authority on the plan to ensure that education requirements are met.                                       |

### Policy GR1 – Growth Sites in Chelmsford City Centre/Urban Area

Key statistics:

| <b>Consultation point</b>                                      | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Policy GR1 – Growth sites in Chelmsford City Centre/Urban Area | 2          | 0         | 10              | 10                               |

Summary of Representations – main issues and suggested changes:

- Support for requirements to make contributions towards new/enhanced sport, leisure and recreation facilities (Sport England)
- Add additional text in relation to active and sustainable travel, and additional bullet for sites to enhance existing pedestrian and cycle routes (Essex County Council)
- Add additional text in relation to green infrastructure and nature recovery networks (Essex County Council)
- Sustainable drainage systems should be a consideration on all proposed development sites, and aligned with green and blue infrastructure provision wherever possible (Anglian Water Services Ltd)
- Add reference to police facilities (Essex Police)
- Concerned about traffic generation in the City Centre, public transport, sustainable travel and car clubs should be considered
- Other sites could also be considered such as Andrews Place (Chelmer Housing Partnership (CHP)).

| <b>CCC response to the comments made</b>  |
|---|
| Policy amended to include the requirement for suitable SuDS and flood risk management.                                      |
| The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe. |

The Policy and Reasoned Justification have been adjusted to refer to facilities alongside infrastructure, and to police, ambulance and fire and rescue.

Text added in relation to active and sustainable travel.

Text added in relation to green infrastructure.

Growth Site Policy 1g – Chelmsford Social Club, Springfield Road

Key statistics:

| Consultation point   | Yes | No | Comments | Total number of responses |
|--|-----|----|----------|---------------------------|
| Growth Site Policy 1g – Chelmsford Social Club, Springfield Road | 0   | 0  | 0        | 0                         |

No comments.

**CCC response to the comments made**

No changes.

Growth Site Policy 1h – Ashby House Car Parks, New Street

Key statistics:

| Consultation point  | Yes | No | Comments | Total number of responses |
|---|-----|----|----------|---------------------------|
| Growth Site Policy 1h – Ashby House Car Parks, New Street | 0   | 0  | 1        | 1                         |

Summary of Representations – main issues and suggested changes:

- Opposed to the removal of car parks to allow for development.

**CCC response to the comments made**

Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes.

Growth Site Policy 1i – Rectory Lane Car Park West

Key statistics:

| Consultation point                                 | Yes | No | Comments | Total number of responses |
|--|-----|----|----------|---------------------------|
| Growth Site Policy 1i – Rectory Lane Car Park West | 0   | 0  | 1        | 1                         |

Summary of Representations – main issues and suggested changes:

- Opposed to the removal of car parks to allow for development.

**CCC response to the comments made**

Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes.

Growth Site Policy 1z – Granary Car Park, Victoria Road

Key statistics:

| Consultation point                                      | Yes | No | Comments | Total number of responses |
|---|-----|----|----------|---------------------------|
| Growth Site Policy 1z – Granary Car park, Victoria Road | 2   | 3  | 8        | 8                         |

Summary of Representations – main issues and suggested changes:

- A Heritage Impact Assessment should be undertaken due to proximity to Grade II listed Springfield Water Mill (Historic England)
- The Cathedral School is at full capacity and would need to expand to meet demand, and a strategic approach is required (The Cathedral School)
- Scale of development should be much more modest due to its location, such as a small terrace to mirror existing nearby houses
- Retain site as City open space; this natural open space should be protected
- Concerns about increased strain on local infrastructure including education
- Previous proposals have not been financially viable
- Opposed to the removal of car parks to allow for development; it is a very important and convenient car park for the nearby hotel, sports events, shopping.

**CCC response to the comments made**

Bullet 7 amended to include layout, height and design considerations to reduce visual impact on the setting of the Grade II listed Springfield Water Mill.

The site is informed by a Heritage Impact Assessment published alongside the Preferred Options Consultation Document.

The plan is informed by a wide range of evidence base reports including an updated Infrastructure Delivery Plan, Viability Assessment, Housing Capacity in Chelmsford City Centre and Urban Area and Open Space Assessment.

CCC will continue to work closely with ECC as the Local Education Authority on the plan to ensure that education requirements are met.

Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes.

Growth Site Policy 1k – Former Chelmsford Electrical and Car Wash, Brook Street

Key statistics:

| Consultation point  | Yes | No | Comments | Total number of responses |
|---|-----|----|----------|---------------------------|
| Growth Site Policy 1k – Former Chelmsford Electrical and Car Wash, Brook Street | 0   | 0  | 0        | 0                         |

No comments.

| CCC response to the comments made  |
|--|
| No changes. However, the site policy has been updated to reflect that a planning application has been submitted. |

#### Growth Site Policy 1aa – Coval Lane Car Park

Key statistics:

| Consultation point                           | Yes | No | Comments | Total number of responses |
|--|-----|----|----------|---------------------------|
| Growth Site Policy 1aa – Coval Lane Car Park | 0   | 1  | 4        | 4                         |

Summary of Representations – main issues and suggested changes:

- Scale of development should be much more modest to be in keeping with surrounding development
- Concerns about increased traffic from new development
- Development should be conditional on provision of a further Park and Ride site at Widford
- Opposed to the removal of car parks to allow for development; loss of parking may impact on West End businesses; there is not enough on-street parking to accommodate the local residents' needs
- Cumulative effect of other nearby development should be considered including office to housing conversions at Paragon House.

| CCC response to the comments made  |
|--|
| The consequential change of adding SuDS and flood risk management to the over-arching Policy GR1 means that the bullet is deleted from this policy.  |
| The plan is informed by a wide range of evidence base reports including an updated Infrastructure Delivery Plan, Viability Assessment, Transport Modelling, Housing Capacity in Chelmsford City Centre and Urban Area and Open Space Assessment. |
| The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.  |
| Policy S9 states that additional Park and Ride facilities will be considered in West Chelmsford.   |
| Site policy already requires the development character, scale and layout to have regard and respond to the site's surrounding context.   |

Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes.

Growth Site Policy 1l – BT Telephone Exchange, Cottage Place

Key statistics:

| Consultation point   | Yes | No | Comments | Total number of responses |
|--|-----|----|----------|---------------------------|
| Growth Site Policy 1l – BT Telephone Exchange, Cottage Place | 0   | 0  | 0        | 0                         |

No comments.

**CCC response to the comments made**

No changes.

Growth Site Policy 1m – Rectory Lane Car Park East

Key statistics:

| Consultation point                                 | Yes | No | Comments | Total number of responses |
|--|-----|----|----------|---------------------------|
| Growth Site Policy 1m – Rectory Lane Car Park East | 0   | 0  | 1        | 1                         |

Summary of Representations – main issues and suggested changes:

- Opposed to the removal of car parks to allow for development.

**CCC response to the comments made**

Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes.

Growth Site Policy 1n – Waterhouse Lane Depot and Nursery

Key statistics:

| Consultation point  | Yes | No | Comments | Total number of responses |
|---|-----|----|----------|---------------------------|
| Growth Site Policy 1n – Waterhouse Lane Depot and Nursery | 0   | 0  | 0        | 0                         |

No comments.



**CCC response to the comments made**

No changes.

Growth Site Policy 1o – Church Hall Site, Woodhall Road

Key statistics:

| Consultation point  | Yes | No | Comments | Total number of responses |
|---|-----|----|----------|---------------------------|
| Growth Site Policy 1o – Chelmsford Social Club, Church Hall Site, Woodhall Road | 0   | 0  | 0        | 0                         |

No comments.

**CCC response to the comments made**

The site has been built-out as is therefore deleted from the plan.

Growth Site Policy 1p – British Legion, New London Road

Key statistics:

| Consultation point                                      | Yes | No | Comments | Total number of responses |
|---|-----|----|----------|---------------------------|
| Growth Site Policy 1p – British Legion, New London Road | 0   | 0  | 0        | 0                         |

No comments.

**CCC response to the comments made**

No changes.

Growth Site Policy 1q – Land rear of 17-37 Beach's Drive

Key statistics:

| Consultation point                                       | Yes | No | Comments | Total number of responses |
|--|-----|----|----------|---------------------------|
| Growth Site Policy 1q – Land rear of 17-37 Beach's Drive | 0   | 0  | 1        | 1                         |

Summary of Representations – main issues and suggested changes:

- Add reference to safe and convenient pedestrian and cycle access (Essex County Council).

**CCC response to the comments made**

Reference to safe and convenient pedestrian and cycle access added.

Additional bullet added for the layout to have regard to the presence of a wastewater pumping station on the site.

Growth Site Policy 1r – Garage Site, St Nazaire Road

Key statistics:

| Consultation point                                   | Yes | No | Comments | Total number of responses |
|--|-----|----|----------|---------------------------|
| Growth Site Policy 1r – Garage Site, St Nazaire Road | 0   | 0  | 1        | 1                         |

Summary of Representations – main issues and suggested changes:

- Add reference to providing a safe and convenient pedestrian link (Essex County Council).

**CCC response to the comments made**

Reference to safe and convenient pedestrian access added.

Growth Site Policy 1bb – Glebe Road Car Park

Key statistics:

| Consultation point                           | Yes | No | Comments | Total number of responses |
|--|-----|----|----------|---------------------------|
| Growth Site Policy 1bb – Glebe Road Car Park | 0   | 1  | 3        | 3                         |

Summary of Representations – main issues and suggested changes:

- A Heritage Impact Assessment should be undertaken due to location in the West End Conservation Area (Historic England)
- Opposed to the removal of car parks to allow for development; this is the only overnight car park; there is already not enough parking for local residents
- Concern that overlooking and noise will be an issue.

**CCC response to the comments made**

The consequential change of adding SuDS and flood risk management to the over-arching Policy GR1 means that the bullet is deleted from this policy.

Bullet 4 amended to define the local context of 2-3 storeys, and that services should be screened from the streetscene.

The site is informed by a Heritage Impact Assessment published alongside the Preferred Options Consultation Document.

Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes.

Policy DM29 requires development proposals to not be overbearing or result in result in excessive noise.

Growth Site Policy 1s – Garage Site and Land, Medway Close

Key statistics:

| Consultation point   | Yes | No | Comments | Total number of responses |
|--|-----|----|----------|---------------------------|
| Growth Site Policy 1s – Garage Site and Land, Medway Close | 0   | 0  | 0        | 0                         |

No comments.

|  |
|--|
| <b>CCC response to the comments made</b> |
| No changes.                              |

Growth Site Policy 1t – Car Park r/o Bellamy Court, Broomfield Road

Key statistics:

| Consultation point  | Yes | No | Comments | Total number of responses |
|---|-----|----|----------|---------------------------|
| Growth Site Policy 1t – Car Park r/o Bellamy Court, Broomfield Road | 0   | 0  | 1        | 1                         |

Summary of Representations – main issues and suggested changes:

- Opposed to the removal of car parks to allow for development.

|   |
|---|
| <b>CCC response to the comments made</b>  |
| Allocated sites are supported by the evidence base including Housing Capacity in Chelmsford City Centre and Urban Area. The NPPF promotes the use of brownfield sites for new homes and other identified needs and the car parks allocated in the Local Plan are promoted for redevelopment – no changes. |

Growth Site Policy 1u – Rivermead, Bishop Hall Lane

Key statistics:

| Consultation point                                  | Yes | No | Comments | Total number of responses |
|---|-----|----|----------|---------------------------|
| Growth Site Policy 1u – Rivermead, Bishop Hall Lane | 0   | 0  | 1        | 1                         |

Summary of Representations – main issues and suggested changes:

- Add reference to provision of new bridges for safe and convenient connections to the pedestrian and cycle network (Essex County Council).

|  |
|--|
| <b>CCC response to the comments made</b> |
|--|

The site has been built-out as is therefore deleted from the plan.

Growth Site Policy 1v – Railway Sidings, Brook Street

Key statistics:

| Consultation point                                    | Yes | No | Comments | Total number of responses |
|---|-----|----|----------|---------------------------|
| Growth Site Policy 1v – Railway Sidings, Brook Street | 0   | 0  | 1        | 1                         |

Summary of Representations – main issues and suggested changes:

- Add reference to provision of safe and convenient pedestrian and cycle routes (Essex County Council).

**CCC response to the comments made**

Reference to safe and convenient pedestrian and cycle access added.

Location 2 – West Chelmsford

Strategic Growth Site Policy 2 – West Chelmsford

Key statistics:

| Consultation point                               | Yes | No | Comments | Total number of responses |
|--|-----|----|----------|---------------------------|
| Strategic Growth Site Policy 2 – West Chelmsford | 3   | 2  | 20       | 20                        |

Summary of Representations – main issues and suggested changes:

- Add reference to ‘multifunctional’ green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Minor policy change suggested to reflect the provision of a primary school and early years nursery (Essex County Council)
- Add reference to active and sustainable modes of transport, where alternatives to the private car are prioritised, and financial contributions towards bus services (Essex County Council)
- Provide safe and convenient pedestrian and cycle connections, links to the urban area and accessibility for bus services (Essex County Council)
- 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 (Essex County Council)
- Support for requirements to make contributions towards new/enhanced sport, leisure and recreation facilities, and inclusion of these facilities in the masterplan (Sport England)
- Add reference to police facilities (Essex Police)

- Concerns of the impact from development on local services such as Writtle GP surgery (Good Easter Parish Council)
- Unclear what healthcare provision is envisaged as part of the proposed neighbourhood centre; a new GP surgery could be provided here (Good Easter Parish Council)
- Concerns about the potential traffic impact on Roxwell Road/A1060, a proportion of the traffic should be able to use Chignall Road via Trent Road/Avon Road (Good Easter Parish Council)
- The proposed multi-user crossing will cause further congestion, although its purpose and intended users is not clear (Good Easter Parish Council)
- Buses will be delayed by traffic queues without space to provide a bus lane
- The commitment to CIL funding is welcome, and assurance is sought that this will not change in future (Writtle Parish Council).

| <b>CCC response to the comments made</b>  |
|---|
| Text relating to provision of education has been updated to reflect ECC requirements, and types of provision have been clarified.   |
| 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.  |
| The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.   |
| Provision of a new stand-alone early years and childcare nursery removed from supporting on-site development and site infrastructure requirements to reflect latest ECC position regarding need.  |
| Requirement for pedestrian and cycle connections expanded to ensure these are 'safe and convenient'.  |
| Additional requirements for a 'new dedicated pedestrian and cycle links to the existing urban area' and the need to 'provide well-connected and integrated internal road layouts which allow good accessibility for bus services' added to policy to reflect the removal of a bus link via Avon Road. |
| Policy and Reasoned Justification updated to expand reference to 'multifunctional' green infrastructure to ensure consistency across the Plan.  |
| Policy and Reasoned Justification updated to expand reference to 'active and sustainable transport to ensure consistency across the Plan.   |
| Site infrastructure requirements updated to include reference to Police, ambulance and fire and rescue facilities.  |
| The necessary contributions to healthcare are covered by site infrastructure requirements. Full details of what these may be will be informed through the planning application process and advice of NHS Mid and South Essex Integrated Care Board.   |

### Location 3 – East Chelmsford

#### Strategic Growth Site Policy 3a – East of Chelmsford, Manor Farm

Key statistics:

| <b>Consultation point</b> | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---------------------------|------------|-----------|-----------------|----------------------------------|
|---------------------------|------------|-----------|-----------------|----------------------------------|

|  |   |   |    |    |
|--|---|---|----|----|
| Strategic Growth Site Policy<br>3a – East of Chelmsford,<br>Manor Farm | 2 | 1 | 16 | 16 |
|--|---|---|----|----|

Summary of Representations – main issues and suggested changes:

- Support policy requirements including for development to provide or make financial contributions to new or enhanced sport, leisure and recreational facilities (Sport England)
- Add to policy requirements for a foul drainage strategy and SuDs as part of a multifunctional green and blue infrastructure delivery framework should an alternative development strategy be taken forward for this site (Anglian Water Services Ltd)
- Support the allocation ((Hopkins Homes Ltd)
- Para. 7.135 – The site has no existing or planned access for horse riders and any proposals could conflict with the residential area and country park users (Hopkins Homes Ltd)
- Do not support Para. 7.141 - Requirement for a Minerals Resource Assessment is inconsistent with Policy S8 of the Minerals Local Plan which exempts land already allocated in adopted plans (Hopkins Homes Ltd)
- Ensure any need for minerals extraction is factored into the housing trajectory to allow for the potential delays to delivery (Hopkins Homes Ltd)
- In absence of any justification, with reference to the CIL Regulations, delete the requirement to fund the creation of a visitors' centre at Sandford Mill (Hopkins Homes Ltd)
- Requirements for financial contributions for education, community and healthcare, sports, leisure and recreation duplicate S9 and S10. If retained in the policy, amend to state that contributions will be “appropriate and proportionate” (Hopkins Homes Ltd)
- A new plan policy is required to address the cumulative recreational pressure on Blakes Wood and Lingwood Common SSSI, Woodham Walter Common SSSI, Danbury Common SSSI and other wildlife sites from increased levels of recreational pressure arising from the new residents at Growth Sites 16a, 3a and 13 (Natural England)
- Add to SGS3a and d policies that active travel connections should be to existing and proposed development areas within East of Chelmsford and at East Chelmsford Garden Community (Wates Developments and Hammonds Estates LLP)
- Expand SGS3a and d to require appropriate measures to enable public transport access to and from the site, and to ensure public transport strategy proposals integrate with existing and proposed development areas within East Chelmsford and at the East Chelmsford Garden Community (Wates Developments and Hammonds Estates LLP)
- Amend Historic and Natural Environment, bullet 4 to refer to ‘multifunctional’ green infrastructure (Essex County Council)
- Amend Movement and Access bullet to refer to ‘safe and convenient’ pedestrian and cycle connections (Essex County Council)

- Amend Site infrastructure requirements bullet 7 to 'Provision of a new northwest safe and convenient pedestrian/cycle link through the Country Park to provide a connection to future off-site cycle links.' (Essex County Council)
- For consistency with other parts of the plan refer to 'active and sustainable travel' in para. 1 of the policy (Essex County Council)
- Object to site for multiple reasons including potential contamination of land, flood risk, housing density and positioning, education and medical care, biodiversity and traffic impacts (Great Baddow Parish Council)
- Under 'Site infrastructure requirements' expand bullet point 10 to refer to police facilities as required by Essex Police (Essex Police)
- Support proposal to improve the cycle crossing of the River Chelmer at Sandon Mill (Cycling UK)
- Include requirement for a more direct cycle route to the city centre which follows Essex Yeomanry Way to the Army and Navy (Cycling UK)
- It appears that the extension to Sandon Park and Ride is now intended to serve Hammonds Farm development
- The SGS3a masterplan should consider pollution sampling from the former nearby landfill site and the nuclear bunker
- The Local Plan is undermined by speculative applications such as the proposed warehouse development at Sandon
- There aren't enough trained professionals to staff the new infrastructure needed e.g. schools
- Unsustainable to build new homes close to the flood plain adjacent to the Army and Navy
- Proposed new developments will increase flooding potential.

| <b>CCC response to the comments made</b>  |
|---|
| Policy S9 already requires developments to provide foul drainage infrastructure.  |
| The site policy already requires flood mitigation measures including SuDS.  |
| Various site policy adjustments have been made including deletion of horse-riding reference as there are no existing or planned access points for horse riders; new requirements to address the cumulative recreational pressure on nearby SSSIs; new requirement for multifunctional green infrastructure; new requirements for active and sustainable travel and connections with East Chelmsford Garden Community and, new requirement for financial contributions towards Police, ambulance and fire and rescue facilities. |
| Requirements for financial contributions are informed by the plan evidence base including the updated Infrastructure Delivery Plan.   |
| A Minerals Resource Assessment remains a policy requirement.  |
| The plan is informed by a wide range of evidence including a Strategic Flood Risk Assessments and Sequential and Exception Testing.   |
| The Council cannot prevent planning applications from being submitted.  |
| The site already has an approved masterplan.  |
| The site policy already requires safe and convenient pedestrian and cycle connections.  |
| The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.   |

Strategic Growth Site Policy 3b – East of Chelmsford, Land North of Maldon Road (Employment)

Key statistics:

| Consultation point   | Yes | No | Comments | Total number of responses |
|--|-----|----|----------|---------------------------|
| Strategic Growth Site Policy 3b – East of Chelmsford, Land North of Maldon Road (Employment) | 0   | 0  | 10       | 10                        |

Summary of Representations – main issues and suggested changes:

- Expand policy to require the development to prepare a strategy for responding to the National Grid Electricity Transmission plc (NGET) overhead transmission lines within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design (National Grid Electricity Transmission)
- Under ‘Site infrastructure requirements’ expand bullet point 5 to refer to police facilities as required by Essex Police (Essex Police)
- Replace Site Infrastructure Requirements, bullet 1 with ‘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 (Essex County Council)
- Support allocation (Redrow Homes & Speakman Family)
- Amend Movement and Access bullet 3 to refer to ‘safe and convenient’ pedestrian and cycle connections (Essex County Council)
- Amend para. 7.151 to refer to ‘safe and convenient cycle/footway’ (Essex County Council)
- Amend Historic and Natural Environment, bullet 3 to refer to ‘multifunctional’ green infrastructure (Essex County Council).

**CCC response to the comments made**

Various site policy adjustments have been made including a new requirement to prepare a strategy for responding to the National Grid Electricity Transmission plc (NGET) overhead transmission lines; revised requirement for a 56 place stand-alone early years and childcare nursery; new requirement for multifunctional green infrastructure, and new requirements for active and sustainable travel connections and, new requirement for financial contributions towards Police, ambulance and fire and rescue facilities.

Strategic Growth Site Policy 3c – East of Chelmsford, Land South of Maldon Road

Key statistics:

| Consultation point | Yes | No | Comments | Total number of responses |
|--------------------|-----|----|----------|---------------------------|
|--------------------|-----|----|----------|---------------------------|



|   |   |   |   |   |
|---|---|---|---|---|
| Strategic Growth Site Policy 3c – East of Chelmsford, Land South of Maldon Road | 0 | 0 | 5 | 5 |
|---|---|---|---|---|

Summary of Representations – main issues and suggested changes:

- Amend Movement and Access bullet 3 to refer to ‘safe and convenient’ pedestrian and cycle connections (Essex County Council)
- Given that SGS3c and SGS3d are at planning application stage, the policy should not include additional infrastructure requirements e.g., a Pegasus crossing unless some flexibility is given (Redrow Homes & Speakman Family)
- Support allocation, but expand the site allocation (Redrow Homes & Speakman Family)
- Object to site for multiple reasons including potential contamination of land, flood risk, housing density and positioning, education and medical care, biodiversity and traffic impacts (Great Baddow Parish Council).

| <b>CCC response to the comments made</b>   |
|--|
| Various site policy adjustments have been made including new requirements for safe and convenient pedestrian and cycle connections.  |
| It is right that the site policy has been updated since the adoption of the Local Plan. Requirements are informed by the plan evidence base including the IDP.   |
| The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.  |
| Objections to the site are noted. The plan allocation is rolled over from the adopted plan and is supported by evidence. Matters such as housing positioning are considered at planning application stage. |

Strategic Growth Site Policy 3d – East of Chelmsford, North of Maldon Road

Key statistics:

| <b>Consultation point</b>  | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Strategic Growth Site Policy 3d – East of Chelmsford, North of Maldon Road | 0          | 0         | 6               | 6                                |

Summary of Representations – main issues and suggested changes:

- Amend Movement and Access bullet 3 to refer to ‘safe and convenient’ pedestrian and cycle connections (Essex County Council)
- Amend para. 7.176 to read 'A safe and convenient cycle/footway should connect the site to Sandon Park and Ride to the east to maximise use of the existing Park and Ride site (Essex County Council)
- Amend Historic and Natural Environment, bullet 3 to refer to ‘multifunctional’ green infrastructure (Essex County Council)

- Support allocation but given that SGS3c and SGS3d are at planning application stage, the policy should not include additional infrastructure requirements e.g., a Pegasus crossing unless some flexibility is given (Redrow Homes & Speakman Family).

**CCC response to the comments made**

Various site policy adjustments have been made including requirements for safe and convenient cycle/footway connections and multifunctional green infrastructure.

It is right that the site policy has been updated since the adoption of the Local Plan. Requirements are informed by the plan evidence base including the IDP.

Location 4 – Growth Site Policy 4 – Land North of Galleywood Reservoir

Key statistics:

| Consultation point  | Yes | No | Comments | Total number of responses |
|---|-----|----|----------|---------------------------|
| Growth Site Policy 4 – Land North of Galleywood Reservoir | 0   | 0  | 4        | 4                         |

Summary of Representations – main issues and suggested changes:

- For consistency with other parts of the plan, strengthen references to active travel in policy and para 7.190 (Essex County Council)
- Policy text should require multifunctional green infrastructure (Essex County Council).
- The viability and deliverability of this site is questioned as it has been allocated for over four years (Park View Group).

**CCC response to the comments made**

Policy adjustments include strengthened requirements for safe and convenient pedestrian and cycle connections and to provide multifunctional green infrastructure.

The site has planning permission and is expected to be delivered between 2025 and 2026.

Location 5 – Growth Site Policy 5 – Land Surrounding Telephone Exchange, Ongar Road, Writtle

Key statistics:

| Consultation point  | Yes | No | Comments | Total number of responses |
|---|-----|----|----------|---------------------------|
| Growth Site Policy 5 – Land Surrounding Telephone Exchange, Ongar Road, Writtle | 1   | 0  | 4        | 4                         |

Summary of Representations – main issues and suggested changes:

- Support allocation. The site is expected to be surplus to operational requirements (as a telephone exchange) by 2031. Adjust boundary to fully reflect our land ownership and ensure deliverability (Telereal Securitised Property GP Limited)
- Use a minimum or indicative capacity of 25 to enable a future planning application to determine the exact quantum, layout, form, mix and tenure of new homes (Telereal Securitised Property GP Limited)
- Amend policy to enable a future planning application to be informed by an arboricultural impact assessment with regards to the potential retention of trees on site (Telereal Securitised Property GP Limited)
- Policy text in relation to infrastructure requirements should be modified to be appropriate and proportionate (Telereal Securitised Property GP Limited)
- For consistency with other policies, amend to strengthen references to active travel (Essex County Council)
- Split bullet 1 under Site Development Principles into two for consistency with other site policies (Essex County Council)
- Policy text should require multifunctional green infrastructure (Essex County Council).

| <b>CCC response to the comments made</b>   |
|--|
| Site boundary has been reduced to reflect the land promoted for development.   |
| The use of the 'around' housing figure would allow for a higher density development to be brought forward where this conforms with other policies in the Plan as a whole.  |
| Various site policy adjustments have been made including requirements for safe and convenient cycle/footway connections, to provide multifunctional green infrastructure, to provide new and enhanced cycle routes and footpaths where appropriate, and to include reference to an arboricultural impact assessment. |

Growth Area 2 – North Chelmsford (paragraphs 7.200-7.205 and Figure 17)

Key statistics:

| <b>Consultation point</b>   | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---|------------|-----------|-----------------|----------------------------------|
| Growth Area 2 – North Chelmsford (paragraphs 7.200-7.205 and Figure 17) | 2          | 1         | 9               | 9                                |

Summary of Representations – main issues and suggested changes:

- Support for the importance of North East Chelmsford and Chelmsford Garden Community in delivering significant levels of growth (Cliffords Group Ltd, Daniel James Developments)
- Support for inclusion of Little Boyton Hall (C J H Farming Ltd)
- Excluding development at Boreham is a missed opportunity (Gladman)

- There is currently no right of way through the Green Wedge from Broomfield, so reference to this should be removed (Broomfield Parish Council).

| <b>CCC response to the comments made</b>  |
|---|
| It is appropriate to retain the reference to using the Green Wedge for sustainable travel to reflect local aspirations for active travel connectivity.                    |
| Figures have been updated to reflect the revised Spatial Strategy.  |
| Development in Boreham village has been considered but rejected due to for example, the impact on the local road network and landscape capacity and sensitivity concerns. |

#### Location 6 – North East Chelmsford (Chelmsford Garden Community)

#### Strategic Growth Site Policy 6 – North East Chelmsford (Chelmsford Garden Community)

Key statistics:

| <b>Consultation point</b>  | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Strategic Growth Site 6 – North East Chelmsford Garden Community | 7          | 0         | 31              | 31                               |

Summary of Representations – main issues and suggested changes:

- Support for the policy (Cliffords Group Ltd, Hallam Land Management)
- Support the policy subject to detailed proposed amendments to wording including replacing 20% biodiversity with 10%, and replacing a new Country Park with three new destination parks and (Vistry Group, Chelmsford Garden Community Consortium)
- Support for measures to encourage physical activity and new or enhanced sport, leisure and recreation facilities (Sport England)
- Support for the inclusion of a country park and green infrastructure, and 20% BNG (Natural England)
- An assessment of what is being provided as suitable alternative natural greenspace is needed (Natural England)
- The distinction between public green spaces and wildlife habitats could be made, with greater focus on integrating biodiversity rather than segregation; planting and biodiversity features should use native species; and would like riparian corridors to maintain a buffer zone for public space rather than private gardens (Environment Agency)
- Ensure that sufficient flood risk measures are incorporated and, where possible, as part of multi-functional green and blue infrastructure; and nature based solutions to provide environmental gains, rather than carbon intensive 'grey infrastructure' mitigation (Anglian Water Services Ltd)
- Refer to 'multifunctional' green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Make a reference to active and sustainable travel (Essex County Council)

- Strengthen the supporting text to reference the importance of the innovation park, the critical success factors needed, skills and the employment mix (Essex County Council)
- Clarify the wording relating to the quantity and type of education provision (Essex County Council)
- 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 (Essex County Council)
- Policy should require renewable and low carbon energy schemes, rather than just encourage them (Essex County Council)
- Stewardship principles are supported. Add additional bullets requiring stewardship activities to be in place for the first housing occupations and for an Asset Schedule of ownership and responsibility for community assets to be prepared (Essex County Council)
- Add to the end of para. 7.216 "Appropriate funding will also need to be made for police facilities to provide for community safety, cohesion and policing as required by Essex Police." (Essex Police)
- Ten Gypsy and Traveller plots have already been provided through the adopted Local Plan; there is now sufficient provision within this community, and it would be desirable to consider locations elsewhere (Chelmsford Garden Community Council)
- Additional land proposed at Domsey Lane, Cranham Road, and Wheelers Hill (Daniel James Developments, Hallam Land Management).

| <b>CCC response to the comments made</b>   |
|--|
| The Policy and Reasoned Justification have been adjusted to refer to facilities alongside infrastructure, and to police, ambulance and fire and rescue.  |
| Text relating to provision of education has been updated to reflect ECC requirements, and types of provision have been clarified. 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. |
| The distinction between public green spaces and wildlife habitats is now covered by updates to Policy DM16; but has also been added to the Reasoned Justification for this policy.   |
| Policy amended to include reference to capacity for wastewater treatment and disposal, and safeguarding of access for the maintenance of foul and surface water drainage infrastructure.   |
| References to safe and convenient travel have been included.   |
| Reference to multifunctional green infrastructure has been added.  |
| The references to country parks have been replaced with Destination Parks.   |
| Stewardship requirements have been clarified, but an asset schedule will be part of stewardship arrangements and does not need to be included in the Policy.   |
| Travelling Showpeople provision is now required instead of Gypsy and Traveller provision, in line with the revised Spatial Strategy.   |
| Referring to only 10% BNG for new Garden Communities would be inconsistent with Policy DM16, which requires 20% BNG on these sites. The Local Plan is supported by the plan evidence base including an updated Viability Assessment.   |
| 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.   |

The encouragement of appropriate development of renewable, low carbon and decentralised energy schemes within the site policy has been amended to state where these are deliverable and do not give rise to environmental or other amenity impacts. However, this remains something that will be encouraged and not required as there is insufficient evidence or policy to require this on site.

### Location 7 – Great Leighs

#### Strategic Growth Site Policy 7a – Great Leighs – Land at Moulsham Hall

| <b>Consultation point</b>                                       | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---|------------|-----------|-----------------|----------------------------------|
| Strategic Growth Site 7a – Great Leighs – Land at Moulsham Hall | 2          | 3         | 19              | 19                               |

#### Summary of Representations – main issues and suggested changes:

- Support for the policy (Environment Agency)
- Policy requirement to provide or make financial contributions to new or enhanced sport, leisure and recreational facilities is welcomed (Sport England)
- Policy change suggested to reflect Essex Police (Essex Police)
- Make reference to ‘multifunctional’ green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Policy change suggested to clarify wording for the primary school provision and childcare facilities (Essex County Council)
- Provide additional safe and convenient pedestrian and cycle connections to Great Leighs village, and ensure good accessibility for buses (Essex County Council)
- Add a reference to active and sustainable travel (Essex County Council)
- 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 (Essex County Council)
- There are woodlands on or in proximity to several allocations including those at Great Leighs, including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Decisions should be made in line with paragraph 186 (c) of the NPPF. Council is also referred to information in Natural England and Forestry Commission’s Standing Advice on Ancient Woodland (Forestry Commission England)
- Phasing conditions may be needed to align development with Anglian Water’s investment plans (Environment Agency)
- The policy does not mention the site location is within the RAMS zone of influence, meaning that an assessment of suitable alternative natural greenspace may be needed (Natural England)
- Clarify wording in relation to the capacity of Great Leighs Water Recycling Centre (Anglian Water)
- Further land is promoted adjacent to the site (Harris Strategic Land Ltd)

- The policy should include a clear requirement for buffer habitat to protect the Essex Wildlife Trust Phyllis Currie Nature Reserve and a financial contribution towards mitigating increased recreational impacts (Essex Wildlife Trust).

| <b>CCC response to the comments made</b>  |
|---|
| Policy wording has been amended to clarify the requirement for sufficient wastewater capacity and disposal. This leaves the reference to phasing conditions, and further references to constraints, as unnecessary.   |
| Text relating to provision of education has been updated to reflect ECC requirements, and types of provision have been clarified. 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.  |
| Requirement for pedestrian and cycle connections expanded to ensure these are 'safe and convenient'.  |
| Policy and Reasoned Justification updated to expand reference to 'multifunctional' green infrastructure to ensure consistency across the Plan.  |
| Policy and Reasoned Justification updated to expand reference to 'active and' sustainable transport to ensure consistency across the Plan.  |
| Site infrastructure requirements updated to include reference to Police, ambulance and fire and rescue facilities.  |
| The requirement for a habitat buffer is already covered by the Policy and Reasoned Justification.   |
| The requirement for RAMS contributions has been removed from all site policies and is covered by Policy S4 and DM16.<br>Policy S4, S9 and DM16 collectively cover an updated requirement for relevant major developments to provide suitable alternative and accessible natural greenspace on-site, in addition to financial contributions in accordance with the adopted RAMS Supplementary Planning Document – no change considered necessary to the site policy. |
| Policies S4 and DM17 protects sites of international, national, regional and local nature conservation importance including Ancient Woodlands.  |

#### Strategic Growth Site Policy 7b – Great Leighs – Land East of London Road

| <b>Consultation point</b>  | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Strategic Growth Site 7b – Great Leighs – Land East of London Road | 0          | 0         | 12              | 12                               |

#### Summary of Representations – main issues and suggested changes:

- Add a reference to active and sustainable travel, and that bus enhancements should be funded by the developer (Essex County Council)
- Provide additional safe and convenient pedestrian and cycle connections to Great Leighs village, especially for older persons (Essex County Council)
- Add reference to 'multifunctional' green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Seek clarification on the affordable housing and specialist residential accommodation mix (Essex County Council)

- Policy changes suggested to reflect Essex Police (Essex Police)
- There are woodlands on or in proximity to several allocations including those at Great Leighs, including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Decisions should be made in line with paragraph 186 (c) of the NPPF. Council is also referred to information in Natural England and Forestry Commission's Standing Advice on Ancient Woodland (Forestry Commission England)
- Phasing conditions may be needed to align development with Anglian Water's investment plans (Environment Agency)
- Clarify wording in relation to the capacity of Great Leighs water recycling centre (Anglian Water)
- The policy does not mention the site location is within the RAMS zone of influence, meaning that an assessment of suitable alternative natural greenspace may be needed (Natural England).

| <b>CCC response to the comments made</b>   |
|--|
| Policy wording has been amended to clarify the requirement for sufficient wastewater capacity and disposal. This leaves the reference to phasing conditions, and further references to constraints, as unnecessary.  |
| Requirement for pedestrian and cycle connections expanded to ensure these are 'safe and convenient'.   |
| Policy and reasoned Justification updated to expand reference to 'multifunctional' green infrastructure to ensure consistency across the Plan.   |
| Site infrastructure requirements updated to include reference to Police, ambulance and fire and rescue facilities.   |
| Policy and reasoned Justification updated to expand reference to 'active and' sustainable transport to ensure consistency across the Plan.   |
| The policy sets out that the site will be required to provide affordable housing - no change considered necessary to the site policy.  |
| The requirement for RAMS contributions has been removed from all site policies and is covered by Policy S4 and DM16. Policy S4, S9 and DM16 collectively cover an updated requirement for relevant major developments to provide suitable alternative and accessible natural greenspace on-site, in addition to financial contributions in accordance with the adopted RAMS Supplementary Planning Document – no change considered necessary to the site policy. |
| Policies S4 and DM17 protects sites of international, national, regional and local nature conservation importance including Ancient Woodlands.   |

Strategic Growth Site Policy 7c – Great Leighs – Land North and South of Banters Lane

| <b>Consultation point</b>  | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Strategic Growth Site 7c – Great Leighs – Land North and South of Banters Lane | 0          | 1         | 13              | 13                               |

Summary of Representations – main issues and suggested changes:



- Support for the allocation (Landvest and Harding Homes)
- Add a reference to active and sustainable travel, and that bus enhancements should be funded by the developer (Essex County Council)
- Provide additional safe and convenient pedestrian and cycle connections to Great Leighs village, especially for older persons (Essex County Council)
- Add a reference to ‘multifunctional’ green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Policy change suggested to reflect Essex Police (Essex Police)
- There are woodlands on or in proximity to several allocations including those at Great Leighs, including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Decisions should be made in line with paragraph 186 (c) of the NPPF. Council is also referred to information in Natural England and Forestry Commission’s Standing Advice on Ancient Woodland (Forestry Commission England)
- Clarify wording in relation to the capacity of Great Leighs Water Recycling Centre (Anglian Water)
- Phasing conditions may be needed to align development with Anglian Water’s investment plans (Environment Agency)
- The policy does not mention the site location is within the RAMS zone of influence, meaning that an assessment of suitable alternative natural greenspace may be needed (Natural England).

| <b>CCC response to the comments made</b>  |
|---|
| Policy wording has been amended to clarify the requirement for sufficient wastewater capacity and disposal. This leaves the reference to phasing conditions, and further references to constraints, as unnecessary.   |
| Requirement for pedestrian and cycle connections expanded to ensure these are ‘safe and convenient’.  |
| Policy and reasoned Justification updated to expand reference to ‘multifunctional’ green infrastructure to ensure consistency across the Plan.  |
| Site infrastructure requirements updated to include reference to Police, ambulance and fire and rescue facilities.  |
| Policy and reasoned Justification updated to expand reference to ‘active and’ sustainable transport to ensure consistency across the Plan.  |
| Reasoned Justification amended to include any enhancements to bus services required to support the site needing to be funded by the developer.  |
| The requirement for RAMS contributions has been removed from all site policies and is covered by Policy S4 and DM16.<br>Policy S4, S9 and DM16 collectively cover an updated requirement for relevant major developments to provide suitable alternative and accessible natural greenspace on-site, in addition to financial contributions in accordance with the adopted RAMS Supplementary Planning Document – no change considered necessary to the site policy. |
| Policies S4 and DM17 protects sites of international, national, regional and local nature conservation importance including Ancient Woodlands.  |

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

Key statistics:

| Consultation point  | Yes | No | Comments | Total number of responses |
|---|-----|----|----------|---------------------------|
| Location 8 – Strategic Growth Site Policy 8 – North of Broomfield | 7   | 0  | 33       | 33                        |

Summary of Representations – main issues and suggested changes:

- Requirement to provide or make financial contributions to new or enhanced sport, leisure and recreational facilities and providing a coherent network of public open space, formal and informal sport, recreation and community space within the site is welcomed (Sport England)
- Address the missing link between Goulton Road and the start of the segregated cycle tracks on Broomfield Road as the current situation is a major barrier to active travel between the site and the city centre (Cycling UK)
- Need more religious facilities/community spaces including for Muslim population in North Chelmsford (Essex Muslim Centre)
- Policy change suggested to add ‘and police facilities as required by Essex Police’ (Essex Police)
- Refer to a robust traffic strategy for the local road network, in lieu of the hospital access road and to add flexibility about how the new health care facility could be achieved (Broomfield Parish Council)
- For consistency with other parts of the plan, strengthen references to active travel and refer to ‘safe and convenient’ pedestrian and cycle connections (Essex County Council)
- Amend to reflect ECC’s preferred wording for ‘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’, and refer to ‘nursery’ rather than ‘nursery school’ in supporting text (Essex County Council)
- Refer to ‘multifunctional’ green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Add individual bullets requiring financial contributions to the North East Bypass and education (Essex County Council)
- Amend reference to ‘good accessibility for buses’ rather than ‘bus priority measures’ (Essex County Council)
- The requirement for a health care facility could be met by a contribution for delivery on an alternative site (Broomfield Parish Council)
- Some allocations have woodland on/near to the site including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Proposals should reduce any impact on irreplaceable habitat. Decisions should reference Natural England and Forestry Commission’s Standing Advice on Ancient Woodland – plus supporting Assessment Guide and “Keepers of Time” – Ancient and Native Woodland and Trees Policy in England (Forestry Commission England).

| CCC response to the comments made |
|-----------------------------------|
|-----------------------------------|

|  |
|--|
| Various site policy adjustments have been made including reference to active and sustainable travel, multifunctional green infrastructure, financial contributions towards Police, ambulance and fire and rescue facilities and good accessibility for |
|--|

|   |
|---|
| bus services. Amended requirement for financial contributions to delivery of Section 1a of the Chelmsford North East Bypass.  |
| The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.   |
| Mitigation measures for the impact of development on the Main Road corridor will be included within a traffic assessment at planning application stage.   |
| An alternative solution to delivering a healthcare facility is not relevant to the site allocation and would require a separate planning application.   |
| Site policy already requires provision of pedestrian and cycle connections.   |
| There are no specific proposals for a religious facility on this site. Policies and S9 and DM20 support the development of community facilities within the plan area.                                       |
| The site policy includes requirements for a woodland buffer. Policies S4 and DM17 protects sites of international, national, regional and local nature conservation importance including Ancient Woodlands. |

### Location 9 – Growth Site Policy 9a – Waltham Road Employment Area

Key statistics:

| <b>Consultation point</b>   | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---|------------|-----------|-----------------|----------------------------------|
| Location 9 – Growth Site Policy 9a – Waltham Road Employment Area | 1          | 11        | 16              | 16                               |

Summary of Representations – main issues and suggested changes:

- Support for the allocation which is in a suitable location and complimentary to the existing provision with no known constraints (LVJ Maldon Limited)
- The use of ‘around’ 3,500sqm is supported but flexibility is needed so that further land can be included to meet employment needs. Boundary should be enlarged to include land to the north (LVJ Maldon Limited)
- Designated heritage assets in and outside the Boreham Roman Road/Plantation Road Conservation Area are unlikely to be impacted (Historic England)
- For consistency with other parts of the plan, strengthen references to active travel in the policy (Essex County Council)
- The existing employment area is a bad example of town planning, an eyesore with larger industrial type operations and in an inappropriate location for employment space, and this proposal would make it worse (Boreham Conservation Society)
- Any additional highway works would adversely infringe on the rural setting of this country road
- Concern over the loss of prime agricultural land, increased flood risk and that the site lacks mains utilities (Boreham Conservation Society)
- Concerns it would generate additional traffic movements through Boreham (already approaching capacity) on top of those already proposed due to the A12 widening scheme (Boreham Conservation Society)

- Existing cycle and walkways are poorly maintained (Boreham Conservation Society)
- The size boundary appears much larger than necessary so could lead to uncontrolled development
- The proposal contradicts ECC's Boreham Traffic Mitigation Scheme
- The planned solar farm development and train station would generate additional traffic movements on top of those from this site
- The proposal would ruin the countryside adjacent to a local wildlife site
- Would lead to increased pollution, the existing employment area is already a nuisance to neighbours
- The existing employment area does not benefit the local community as occupiers are mainly large operators and all employees must travel by car.

| <b>CCC response to the comments made</b>   |
|--|
| The site allocation, quantum and boundary are supported by the plan evidence base including the Heritage Impact Assessment, traffic modelling, Strategic Flood Risk Assessment and Employment Land Review – no changes proposed.                                     |
| Waltham Road Employment Area is a well-established site and its expansion will provide further rural inward investment opportunities and also reflect the aspirations of national policy to support the sustainable growth and expansion of business in rural areas. |
| Site policy adjusted to require safe and convenient pedestrian and cycle links.  |
| The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.  |

#### Location 14 – Ford End

##### Growth Site 14a – Land West of Back Lane, Ford End

Key statistics:

| <b>Consultation point</b>                          | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Growth Site 14a – Land West of Back Lane, Ford End | 1          | 17        | 20              | 20                               |

Summary of Representations – main issues and suggested changes:

- Ford End is within Great Leighs Water Recycling Centre catchment area which has some capacity to accommodate flows from small scale growth. There are no Anglian Water assets within the indicated areas for growth at Ford End (Anglian Water)
- A Heritage Impact Assessment (HIA) would be beneficial to identify any necessary mitigation and enhancement measures. Amend policy is require a Heritage Impact Assessment with a planning application (Historic England)
- Object to the allocation. Concerns include access, flooding, heritage impacts and neighbour amenity (Great Waltham Parish Council)
- Policy changes suggested relating to education provision (Essex County Council)
- Support the allocation expressed

- Concerns expressed relating to loss of Grade 2 agricultural land, impacts on heritage assets, flood risk, limited pedestrian and cycle connections to the site and, noise, air and light pollution
- Proposal will increase traffic and congestion, previous requests for road calming measures were rejected by Essex Highways
- Lack of existing infrastructure to support the development including a suitable road network, local shops, school and utility capacity and public transport
- Unsuitable/unsafe access and egress to the site, including roads being too narrow for vehicles and pedestrians
- Concerns over impacts on settlement character and countryside
- The development will not contribute to the local economy
- There more suitable sites within the vicinity as set out in the SHELAA
- Impact on neighbour amenity owing to (amongst other matters) the ground levels being higher at the allocation site.

| <b>CCC response to the comments made</b>   |
|--|
| Following further consideration, this site has been removed from the plan and it is no longer considered deliverable given existing site constraints including poor pedestrian access and impact on heritage assets. |
| Heritage Impact Assessments were published alongside the Preferred Options Local Plan and have been used to inform site allocation policies.   |
| The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.  |

### Growth Site 14b – Land South of Ford End Primary School

Key statistics:

| <b>Consultation point</b>                               | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---|------------|-----------|-----------------|----------------------------------|
| Growth Site 14b – Land South of Ford End Primary School | 2          | 18        | 24              | 24                               |

Summary of Representations – main issues and suggested changes:

- Support but allocate the whole site (5.37ha) for around 50 homes. This would deliver substantial benefits (Dandara Eastern)
- Support and consider a greater quantum on a single site rather than Growth Site 14a (Great Waltham Parish Council)
- Development should include appropriate access arrangements, traffic management, and mitigation and contributions towards education (Great Waltham Parish Council)
- Development would not affect any designated heritage assets (Historic England)
- Ford End is within Great Leighs Water Recycling Centre catchment area which has some capacity to accommodate flows from small scale growth. There are no Anglian Water assets within the indicated areas for growth at Ford End (Anglian Water)

- Policy changes suggested relating to education provision (Essex County Council)
- Support expressed for site
- Concerns expressed relating to loss of Grade 2 agricultural land, impacts on heritage assets, flood risk and drainage, limited pedestrian and cycle connections to the site and, noise, air and light pollution
- Proposal will increase traffic and congestion, previous requests for road calming measures were rejected by Essex Highways
- Lack of existing infrastructure to support the development including a suitable road network, local shops, school and utility capacity and public transport
- Unsuitable/unsafe access and egress to the site, including roads being too narrow for vehicles and pedestrians
- Concerns over impacts on settlement character and countryside
- The development will not contribute to the local economy
- There more suitable sites within the vicinity as set out in the SHELAA
- Impact on neighbour amenity owing to (amongst other matters) the ground levels being higher at the allocation site.
- The development will conflict with the school's current access arrangements, impacting on the safety of children
- Concerns that houses will overlook the school and impact on the safety of children.

| <b>CCC response to the comments made</b>  |
|---|
| The site allocation is supported by the plan evidence base including Strategic Flood Risk Assessments, Water Cycle Studies, Landscape Sensitivity and Capacity Study, new Air Quality Assessment and traffic modelling. The Small Sites Planning Briefs/Concept Framework 2024 considers that there are no overriding site constraints which mean that the site is unsuitable or undeliverable. |
| The 'small sites' (under 1ha) are an important part of the Plan to ensure delivery of a variety of sites in a timely manner, and to meet NPPF requirements to provide 10% of small sites. The enlargement of these sites would be likely to put greater pressure on local facilities and infrastructure which could make such sites unsuitable for development.                                 |
| This allocation will provide housing on a site no larger than one hectare to help meet requirements in national planning policy - the site boundary is acceptable.  |
| The site policy sets our development principles including access arrangements and infrastructure requirements including contributions towards education.  |
| The use of the 'around' housing figure would allow for a higher density development to be brought forward where this conforms with other policies in the Plan as a whole.   |
| The Reasoned Justification has been amended to recognise that speeding by vehicles on Main Road (B1008) is an issue and as such traffic calming should be provided as part of the development including speed reduction measures.   |
| Ford End is a Service Settlement with a primary school and bus service making it suitable for small scale development.  |
| The allocation will help to support the services and facilities in the village and help to maintain a diverse housing supply.   |
| The site policy requires appropriate active and sustainable travel connections to be provided within the site with links into the wider network, including the primary  |

school. It also includes provision for appropriate improvements, as necessary, to the local and strategic road network.

The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.

The plan has been changed to recognise that there is limited parking and drop-off at the primary school and that future access arrangements into the development site could exacerbate this issue. Therefore, the plan provides a new area of parking for the primary school's use adjacent to the site allocation. This is shown on the Draft Policies Map.

The site policy has been expanded to require development to be set back from Main Road (B1008) and to restrict the height of new development to two-storey.

The site policy requires the development to be appropriate to the character of the area.

To meet our development needs it is inevitable that some agricultural land will be used for development.

### Location 15 – Little Boyton Hall Farm Employment Area

Key statistics:

| <b>Consultation point</b>                             | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---|------------|-----------|-----------------|----------------------------------|
| Location 15 – Little Boyton Hall Farm Employment Area | 2          | 1         | 8               | 8                                |

Summary of Representations – main issues and suggested changes:

- Existing and prospective tenants support the proposal. They respect for example, the location, provision of parking and landscaping (Christopher Philpot)
- Support but amend policy to optimise flexibility and deliverability of the site for example by removing the need for a masterplan or changing the timing of when it is required (CJH Farming Ltd)
- Expand the range of uses that can come forward, provide a flexible site capacity, and expand the allocation boundary (CJH Farming Ltd)
- Grade II listed Little Boyton Hall is adjacent to the site but impacts are considered unlikely. Amend policy text to ensure it is protected (Historic England)
- Add additional text in relation to green infrastructure (Essex County Council)
- For consistency with other parts of the plan, strengthen references to active travel (Essex County Council)
- Concerns expressed including loss of agricultural land, site is unsustainable, will be harmful to the landscape and adversely impact on views from the north which is largely ignored by the consultant (Chignal Parish Council)
- The site is near an Ancient Woodland. Consider direct and indirect effects of development during the construction and operational phases (Forestry Commission England)
- The site is very tranquil, is poorly served by public transport and difficult to cycle to, hence most users will drive

- Whilst the site is intended to be served from the A1060, occupiers might access from Chignal/Mashbury/High Easter where the lanes are in a very poor condition.

| <b>CCC response to the comments made</b>  |
|---|
| The plan requires masterplans all Strategic Growth Sites to inform the planning application process and to help ensure that the resulting development is amongst other considerations well designed and high quality. |
| The type of employment floorspace to be provided will help meet future needs as identified in the Employment Land Review 2024.  |
| The site policy includes protection for the setting of Little Boyton Hall Grade II Listed Building.   |
| Amendments have been made to strengthen references to active travel and to require 'multifunctional' green infrastructure.  |
| To meet our development needs it is inevitable that some agricultural land will be used for development.  |
| The site allocation is supported by the plan evidence base including a Landscape Sensitivity and Capacity Study 2024 and traffic modelling.   |
| The site allocation requires the protection of the nearby Ancient Woodland Nightingale Wood.  |
| The site allocation requires the provision of safe and convenient pedestrian and cycle connections and opportunities to maximise the provision of public transport.   |
| The site allocation requires vehicular access to be via the existing site access road off the A1060.  |

Growth Area 3 – South and East Chelmsford (paragraphs 7.340-7.348 and Figure 18)

Key statistics:

| <b>Consultation point</b>  | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Growth Area 3 – South and East Chelmsford (Paragraphs 7.340-7.349 and Figure 18) | 2          | 5         | 10              | 10                               |

Summary of Representations – main issues and suggested changes:

- Support expressed (Pigeon (Sandon) Ltd, Cycling UK)
- In para. 7.341 add reference to 'multifunctional' green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Reword 'Site infrastructure requirements' sections in revised site policies to simply refer to school land requirements i.e. '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' (Essex County Council)
- Expand para. 7.343 to refer to 'new' bus services as well as enhanced (Essex County Council)
- Amend para 7.345 to reflect that only Location 10 will provide improvements to the A132/B1012 Rettendon Turnpike Junction as development at Danbury



and Bicknacre will only provide site access and local walking and cycling improvements as appropriate (Essex County Council)

- Require financial contributions for provision of new and/or enhanced bus services in the 'Movement and Access / Site Infrastructure Requirements' sections of site policies (Essex County Council)
- Do not support. Need a Green Belt Review to identify a more sustainable distribution of new housing including within/around Key Service Settlements in the Green Belt (Whirledge & Nott, Croudace Homes)
- Various comments from landowners/developers promoting their proposed development sites including within the Green Belt.

Main issues raised in relation to locations in Growth Area 3 appear under the specific sites e.g. SGS16a.

| <b>CCC response to the comments made</b>  |
|---|
| Various text amendments made including reference to 'multifunctional' green infrastructure and new bus services.  |
| Site policies have been reworded in respect to school land requirements.  |
| The amount of development required during the plan period 2022-2041 can be accommodated outside of the Green Belt so there is no need to carry out a Green Belt review. This accords with national policy and guidance.   |
| The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process. |

#### Location 16 – East Chelmsford

#### Strategic Growth Site 16a – East Chelmsford Garden Community (Hammonds Farm)

Key statistics:

| <b><u>Consultation point</u></b>   | <b><u>Yes</u></b> | <b><u>No</u></b> | <b><u>Comments</u></b> | <b><u>Total number of responses</u></b> |
|--|-------------------|------------------|------------------------|---|
| Strategic Growth Site 16a – East Chelmsford Garden Community (Hammonds Farm) | 9                 | 4410             | 4433                   | 4448                                    |

It should be noted that in some cases, members of the public raised similar points to stakeholders listed in brackets. This is especially the case in relation to comments made by Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group to this Strategic Growth Site which have been replicated and amplified by many individuals. To avoid duplication, these comments have not been repeated in the public comments. However, this does not affect the consultation process as this report focuses on the main issues received rather than the number of representations to any individual section of the plan.

Summary of Representations – main issues and suggested changes:

- Supportive of Garden Communities and that they follow TCPA Garden City Principles, and recommend that East Chelmsford is progressed having regard to the key principles set out in the Essex Design Guide - Garden Communities (Essex County Council)
- Fully support the numbers and types of homes/employment proposed in the site allocation (Wates Developments and Hammonds Estates LLP)
- Support the introduction of new employment uses in the area that will help strengthen Chelmsford's economy (CNG Fuels)
- The delivery of Site 16b is conditional upon the masterplan of Site 16a, and consequently the expectation of delivery by 2030 maybe unrealistic (Greystoke CB)
- Identify in the policy that the Garden Community has potential to support an innovative and bespoke housing mix to assist in optimising delivery, and achieving Garden City Principles (Wates Developments and Hammonds Estates LLP)
- Inconsistent with two very recently adopted neighbourhood plans (Little Baddow Neighbourhood Plan (2023) and the Sandon Neighbourhood Plan (2023)) as well as with the Reg 15 Submission Version of the emerging Danbury Neighbourhood Plan (2024) (Croudace Homes)
- The site is not needed in the Plan, the housing numbers could be met by extending North East Chelmsford Garden Community
- Building more at North East Chelmsford Garden Community would be more suitable as it has the infrastructure in place already, and would preserve this rural area, its good quality farmland and protect the community here (Little Baddow Society, Danbury Parish Council)
- All of the previous five options included additional growth in North East Chelmsford Garden Community so why is development not going there
- The housing numbers are not needed until the end of the Plan period so it is premature to consider the site now
- Development should be on brownfield sites, not greenfield sites
- This is Green Belt land and should not be built on
- Green Belt land to the southwest of Chelmsford should be considered instead (Boreham Conservation Society, Barratt David Wilson (Eastern Counties))
- A continuation of development between Regiment Way and the route of the new NE Bypass to the West of Broomfield would be better (Boreham Conservation Society)
- The site is in an unsuitable location, detached from Chelmsford. Development would result in urban sprawl and there should be no development to the east of the A12 as it is a defensible boundary (Boreham Conservation Society, Richborough, This Land Ltd, Croudace Homes, Barratt David Wilson (Eastern Counties))
- Unacceptable loss of high grade agricultural land (Sandon Parish Council, Great Baddow Parish Council, CPRE Essex, Boreham Conservation Society, Danbury Parish Council)
- There is no evidence showing actual land quality, only general agricultural land classifications have been provided (Sandon Parish Council, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- Additional crime in the area

- The site was not selected in the current adopted Local Plan and nothing has changed for the reasons it was not selected then, so it should not go ahead now (This Land Ltd, Danbury Parish Council, Croudace, Barratt David Wilson (Eastern Counties))
- Support the allocation of sites for Gypsy, Traveller and Travelling Showpeople housing needs (Basildon Borough Council)
- No evidence that a Gypsy and Traveller site is needed, and this is not a suitable location for one
- Support for additional employment in the area
- ‘Supporting on-site development’, bullet 3 should be 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 (Essex County Council)
- ECC’s document ‘SEND Sufficiency Plan For Engagement Autumn 2023’ identifies a lack of special educational needs schools in the east of Essex. Due to the number of schools proposed at site 16a, consider a SEND school for children aged up to 16 years (and beyond if possible) on the site for the provision of children and young people in east Essex (Maldon District Council)
- No infrastructure is in place to support this development (roads, healthcare – GPs and Hospitals, dentists, education, waste water and sewerage, emergency services) (Boreham Conservation Society, Woodham Walter Parish Council, Danbury Parish Council)
- The amount of infrastructure required will delay the delivery timeframe for the site (This Land Ltd, Croudace Homes)
- The site policy does not plan sufficiently for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments (Great Baddow Parish Council)
- Policy should be more positive requiring the development to provide renewable, low carbon and decentralised energy schemes on site (Essex County Council)
- Supports in principle the Movement and Access requirements for the site to provide substantive active and sustainable travel connections to the Chelmsford Urban Area and key destinations (Essex County Council)
- Site requirements should be amended to help ensure wider connectivity to and from the site is achieved (Essex County Council)
- Include in the site infrastructure measures to ensure the community is highly walkable with safe and lit pathways which connect forming a walking and cycling network to surrounding areas such as Danbury, Little Baddow, Sandon and Great Baddow (Great Baddow Parish Council)
- There are opportunities to improve the National Cycle Network in the area, including improvements to NCN1 which has some significant issues deterring its use (Cycling UK)
- The proposed cycle route link to Boreham junction will be very important to provide an active travel link to Beaulieu Station, North Chelmsford and a link to the countryside for leisure cyclists and is a better alternative to the existing cycle route (Cycling UK)

- No suitable mitigation measures set out for transport/highways impacts (Little Baddow Society)
- The impact assessment indicates that the development in this location will cause issues on the A12 between J17 and J19, which National Highways has no plans to mitigate
- The proposed mitigation to reduce congestion on the A414 acknowledges that this will drive more rat-running through Little Baddow and Sandon, exacerbating an already significant problem
- Traffic congestion will impact wider Villages and areas such as Little Baddow, Great Baddow, Bicknacre, Danbury, Sandon and Boreham, Woodham Walter, as well as residents from Maldon (Sandon Parish Council, Great Baddow Parish Council, Chelmer Valley Landscape Group, Little Baddow Society, Boreham Conservation Society, Little Baddow Society, Little Baddow History Centre, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Woodham Walter Parish Council, Danbury Parish Council)
- Unacceptable impact on the local (rat-running and congestion, including the A414 and Eves Corner) and strategic road (A12 capacity and junctions) networks with no evidence to support the proposal (Sandon Parish Council, Essex Waterways Ltd, Chelmer Valley Landscape Group, Little Baddow Society, Boreham Conservation Society, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, This Land Ltd, Woodham Walter Parish Council, Danbury Parish Council, Croudace Homes, Barratt David Wilson (Eastern Counties))
- Will result in delays along the A414 from Danbury for buses from SWF and Maldon unless dedicated bus lanes are factored into the road improvements along this section of the A414 (South Woodham Ferrers Residents Party, Danbury Parish Council)
- More traffic onto the A130/A12 causing further commuter delays at the Howe Green and Sandon junctions. There may also be negative effects on the use of the Sandon Park and Ride (South Woodham Ferrers Residents Party)
- Impact of wider projects including the Lower Thames crossing, A12 widening, Norwich to Tilbury Pylons, Bradwell power station on traffic flows has not been considered (Great Baddow Parish Council, Boreham Conservation Society)
- Impact of traffic using the new station has not been sufficiently accounted for in the traffic modelling (Sandon Parish Council)
- The impact of additional houses in North East Chelmsford Garden Community would be less on local roads and the A12 than this location
- No traffic modelling has taken place to support this site
- Traffic modelling evidence is insufficient and the impact of the proposed development on the main road network (A12 and A414) is highly likely to be severe (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Danbury Parish Council)
- Impact of construction traffic on already congested local road network (Chelmer Village Council)
- Encourage ongoing discussions with the Public Transport Operator and the Local Highway Authority to assist with the continuing delivery of infrastructure in Growth Area 3 (Basildon Borough Council)
- Further evidence on how active travel corridors will be made safe and lit to encourage sustainable travel is required (Great Baddow Parish Council)

- Challenge the deliverability of sustainable travel opportunities to deliver a 60% modal share for active and sustainable transport, particularly to the two Stations. If not achieved the impact on the A12 cannot be effectively mitigated (Strutt and Parker Farms Ltd, Gladman Developments Ltd, This Land Ltd, Croudace Homes)
- Increased use of City Centre train station which is nearing capacity (Barratt David Wilson (Eastern Counties))
- Remove the word 'dedicated', from bullet point 6 under Movement and access, so that all avenues for providing car clubs with operators can be explored (Wates Developments and Hammonds Estates LLP)
- Agree with the policy requirement for significant new multifunctional green and blue infrastructure, and this should form the framework for delivering suitable SuDS and flood risk management and achieving 20% BNG (Anglian Water)
- Support that at least half the gross site area is multifunctional green and blue infrastructure, to provide sufficient space to maximise all opportunities including public access and amenity (Anglian Water)
- A distinction between public green spaces and habitats for wildlife should be explicitly clarified in the site policy (Environment Agency)
- While the Local Plan promotes habitat enhancement and biodiversity through measures like vegetation planting, and encourages designs that incorporate biodiversity features, we would like to see it specified that native species are used in all cases (Environment Agency)
- Add an explicit preference to retaining riparian corridors as public open space over private gardens. Include buffer zones alongside rivers reserved as public space, rather than private land that backs directly onto a river (Environment Agency)
- Supports the Historic and Natural Environment masterplanning principles to include conserve and enhance biodiversity and avoid adverse effects on the River Chelmer, and Old Hare Wood Local Wildlife Sites, Waterhall Meadows Essex Wildlife Trust Nature Reserve, and Long Spring Wood and Hall Wood ancient woodlands, and Blakes Wood and Lingwood Common SSSI. Also reference Danbury Common SSSI (National Trust)
- The site currently floods, and this will be made worse both within and around the site if built on. It could impact rivers if suitable waste water/sewerage facilities are not sufficient to deal with flooding and climate change impacting the health of waterway users as well as pollution to wildlife (Sandon Parish Council, Great Baddow Parish Council, Chelmer Valley Landscape Group)
- Insufficient modelling has been undertaken to review the full effects of flood risk, including future climate change and if this will adversely affect flooding (Great Baddow Parish Council, Chelmer Valley Landscape Group, Little Baddow Society, Boreham Conservation Society, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Danbury Parish Council)
- Significant areas of the allocation lie within Flood Zone 2 and 3. The site allocation does not pass the sequential test as there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding (Strutt and Parker Farms Ltd, Richborough, This Land Ltd, Tayor Wimpey)
- Pollution and harm to the river environment from the development, including the Chelmer and Blackwater Navigation Landscape Conservation Area

(Sandon Parish Council, Great Baddow Parish Council, Chelmer Valley Landscape Group, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Woodham Walter Parish Council)

- Additional pressure on the Chelmer and Blackwater Navigation for recreational purposes including walking, cycling, canoeing, paddle-boarding and boating as well as visitor parking without any proposals to provide improvements or mitigation (Essex Waterways Ltd, Chelmer Valley Landscape Group)
- The proposed new bridge will split the development in half, be unduly prominent in the river valley, create noise and moving visual intrusion, and be detrimental to the character and appearance of the designated Chelmer and Blackwater Navigation Conservation Area and views from Boreham House. No amount of landscape enhancement will mitigate the harm it will cause (Essex Waterways Ltd, Chelmer Valley Landscape Group, Boreham Conservation Society)
- Impact on users' enjoyment of existing footpaths and rivers for recreation and pleasure
- Harm to the rural landscape and urbanisation of the area, including Waterhall Meadow, an ancient flood meadow (Sandon Parish Council, CPRE Essex, Little Baddow Society, Boreham Conservation Society, Essex Wildlife Trust, Danbury Parish Council, Croudace Homes)
- The impact on the landscape would be damaging and hard to mitigate (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- Increased air pollution
- Harm to the natural environment and protected areas of wildlife/habitats in the vicinity (Sandon Parish Council, CPRE Essex, Essex Wildlife Trust, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Richborough)
- Harm to wildlife in the area and loss of habitat for species including, muntjac, bats, badgers, foxes, birds (Sandon Parish Council, Little Baddow Society, Boreham Conservation Society, Essex Wildlife Trust, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- There are several areas of Lowland Mixed Deciduous Woodland, which are Priority Habitat Woodland, within or adjacent to the site which need to be considered. Lowland Mixed Deciduous Woodlands are on the Priority Habitat Inventory, England. Fragmentation of woodland reduces its ecological value and woodlands can suffer loss or deterioration from development nearby (Forestry Commission England)
- Any planning application for major residential development should be required to include a robust assessment of the residual recreational impact of the development on the nearby SSSI's, local wildlife sites and ancient woodlands, and that mitigation measures are included where appropriate. This should consider cumulative development in the area (National Trust, Natural England, Essex Wildlife Trust, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Richborough)
- The site has been submitted for consideration for it to be designated as an Area of Outstanding Natural Beauty/National Landscape and proposals for development are premature until this has been considered by Natural England (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Danbury Parish Council, Croudace Homes)

- Undertake a Heritage Impact Assessment (HIA) in advance of Regulation 19 to determine whether the site is suitable for allocation, to inform its capacity, and to identify any necessary mitigation and enhancement measures. If the site is deemed suitable incorporate any mitigation and enhancement measures into the site policy (Historic England)
- Impact on heritage and archaeological assets in the area (Little Baddow Society, Little Baddow History Centre, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Richborough)
- Maintain the character of and biodiversity along Graces Walk (Cycling UK)
- Agree with the principle of bullet 4 of Historic and Natural Environment, but adjust to reflect that all of the listed buildings are outside of the development's ownership, rendering it impossible to enhance the structures themselves (Wates Developments and Hammonds Estates LLP)
- The policy wording in relation to heritage assets utilises the statutory language of 'preservation'. Suggest a more appropriate term would be 'conservation', to reflect national planning policy (Wates Developments and Hammonds Estates LLP)
- Remove Church Lane as a 'Protected Lane' as the Protected Lanes Study for Chelmsford Borough Council: Summary Report 2009 states that it does not meet the 'protected lane' threshold (Wates Developments and Hammonds Estates LLP)
- It is not yet known whether the site contains a viable minerals resource that would require extraction prior to development (Little Baddow Society, Little Baddow History Centre, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Croudace Homes, Taylor Wimpey)
- Ensure any Anglian Water assets within and adjacent to the site that may be affected by the development are reflected in the site policy including a requirement for appropriate safeguarding of suitable access for the maintenance of foul and surface water drainage infrastructure (Anglian Water)
- Expand policy to require the development to prepare a strategy for responding to the National Grid Electricity Transmission plc (NGET) overhead transmission lines present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design (National Grid Electricity Transmission)
- Houses should not be built close to the pylons on site
- The National Grid Transmission Overhead Lines, UK Power Networks Overhead Lines and Cadent Local High Pressure Gas Mains constrain the site for development (This Land Ltd)
- Support the reference in 'Site infrastructure requirements' regarding early years, primary and secondary provision subject to some minor amended wording including adding a reference to accordance with Policy S10 (Essex County Council)
- Support for the provision of open spaces, sports, and physical activity provided in the policy (Sport England)
- Under the subheading 'site infrastructure requirements' and in bullet point 8 at the end add "and police facilities as required by Essex Police" (Essex Police)
- Uncertainty over the viability of the site in respect of the scale and cost of highways improvements that will be required (Strutt and Parker Farms Ltd, Richborough, Gladman Developments Ltd, Taylor Wimpey)

- The site is in multiple ownerships and therefore constraints associated with land values and timely delivery (Richborough)
- Support bullet points 1-3 of Site Infrastructure Requirements, but welcome further flexibility through additional text stating “or the equivalent land take needed to deliver the school places identified as needed by the Local Authorities with Responsibility for Education (LARE)”, given the requirement could flex over time. References to the education provider should be renamed as the Local Authorities with Responsibility for Education (Wates Developments and Hammonds Estates LLP)
- Support the principle of providing contributions towards the facilitation of necessary highway transport infrastructure under bullets 4 and 5 Site infrastructure requirements, but add clarity that the appropriate improvements will be defined by the Transport Assessment (Wates Developments and Hammonds Estates LLP)
- In relation to bullet 6 of Site Infrastructure Requirements clarification is sought in the wording that the definition of bus-based rapid transit refers only to the sustainable modes bridge over the A12, and does not require the provision of dedicated bus corridors throughout the development (Wates Developments and Hammonds Estates LLP)
- Bullet 8 of Site Infrastructure Requirements could be interpreted as open-ended, add additional wording so it reads “Provide and/or financial contributions to healthcare provision as required by the NHS Mid and South Essex Integrated Care Board to address the needs of the development.” (Wates Developments and Hammonds Estates LLP)
- Stewardship principles are supported and should be established early on with an asset schedule prepared to outline management and maintenance of assets (Essex County Council)
- Do not support the description of a masterplanning principle within Para. 7.224 (Section 3) that there should be a “choice of unimpeded route corridors within the developed area, able to carry rapid transit services”. Whilst bus priority is supported in principle, this could suggest a need for a continuous dedicated bus-only corridor through the site. The principle of bus priority and rapid transit can be achieved through a combination of measures (Wates Developments and Hammonds Estates LLP)
- Add a new line at the end of para. 7.362 as follows “Appropriate funding will also need to be made for police facilities to provide for community safety, cohesion and policing as required by Essex Police.” (Essex Police)
- Joint working between the Councils is needed to ensure there are no detrimental impacts on Basildon Borough and its residents from development in Growth Area 3 (Basildon Borough Council).

| <b>CCC response to the comments made</b>   |
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| As the site is allocated as a new Garden Community and the largest new Strategic Allocation, an additional requirement for a Travelling Showpeople site for 13 serviced plots has been included to ensure the Plan seeks to meet the higher identified Travelling Showpeople’s needs identified by the updated GTAA.   |
| The policy has been amended to clarify that the new Country Park will be primarily informal and natural in nature to better reflect the aspiration for this area set out in the Reasoned Justification – that the area is expected to retain and improve habitats for wildlife and provide new and enhanced recreational opportunities, including the waterways. |



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| The policy now includes a requirement to provide necessary mitigation to address the cumulative recreational pressure on SSSIs in proximity to the site.  |
| Danbury Common has been added as a SSSI to be conserved and enhanced, and to avoid adverse effects on within the policy requirements and Reasoned Justification.  |
| Site infrastructure requirements and Reasoned Justification have been expanded to include contributions towards addressing cumulative recreational pressure on SSSIs in proximity to the site.  |
| The Reasoned Justification has been expanded to explain that high quality semi-natural greenspaces of at least 12ha each should be provided to meet Natural England's 8ha/1000 new population metric and minimum circular dog-walking route on or off site of 2.3km which make use of existing Public Rights of Way and/or highways.  |
| Reference to the precise uses of the multifunctional green and blue infrastructure being defined through the masterplanning process has been added to the Reasoned Justification. This now sets out that this will include delineating specific areas where wildlife and ecological areas are prioritised.  |
| For clarity the policy requirements now require the area to the east of Sandon Brook notated on the Policies Map for Future Recreation/SuDS/Biodiversity should focus on informal recreation, natural and semi natural green infrastructure uses rather than formal sports recreation requiring floodlighting or significant servicing.   |
| The need to provide visual and acoustic screening to the A12 and minimise the impact of lighting in particular within the employment areas has been added as a requirement to the policy.   |
| The Reasoned Justification has been expanded to include buffer zones alongside rivers, reserved as public space, as part of compensatory measures to provide landscape enhancement as part of a scheme.   |
| The Reasoned Justification has been expanded to note that the achievement of 20% biodiversity net gain on site will be subject to site constraints.   |
| Reference to the need for the new Country Park to include high quality semi-natural greenspace to be used in conjunction with the existing PROW network to provide circular dog-walking routes of at least 2.3km has been added to the Reasoned Justification.  |
| To reflect that it is as yet unknown if the school on site will be a through school or not the policy wording and Reasoned Justification amended to include a co-located primary and secondary school with early years and childcare nursery (with potential for a sixth form centre).  |
| 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 changes required.   |
| Policy requirement and Reasoned Justification for new and enhanced pedestrian, cycle and where appropriate bridleway connections within the site expanded to ensure both the Reasoned Justification and policy requirement include reference to links to the River Chelmer Navigation, Little Baddow and Great Baddow.  |
| Reference to a 'dedicated' car club for residents and businesses on site has been amended to ensure it is also available to wider users in the area.  |
| The Council has undertaken various Heritage Impact Assessments to inform the Local Plan, with a specific assessment being undertaken for the Hammonds Farm site. The levels of harm identified within the Hammonds Farm Heritage Impact Assessment are considered to be justified. Whilst parts of the site are identified as being of high heritage value, other parts, particularly to the south are of variable or |

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| <p>lower heritage value. The heritage harms identified do not necessarily rule out the development, rather they need to be avoided, minimise or mitigated as part of the masterplan for the proposals. Reference to heritage assets which require consideration have been updated in the policy requirements and Reasoned Justification.</p>  |
| <p>The requirement for a detailed Heritage Impact Assessment to be prepared has been added as a policy requirement as the site, particularly land to the north of Rumbolds Farm, Hammonds Road, contains a significant number and configuration of crop marks requiring further investigation. The Reasoned Justification sets out the requirements for such an assessment, and that once complete the evaluation will inform the location of development parcels and open space within the masterplan.</p>                                     |
| <p>The Little Baddow, Danbury, Boreham and Sandon Parish Councils response included a reference to Little Baddow Parish Councils proposals for three conservation areas to be designated; at Great Graces, St Marys Church and North Hill. Further work is being undertaken to explore a conservation area on North Hill by CCC. Conservation areas at Grace Graces and St Marys Church are not justified and the duty to preserve and enhance the setting of the various designated heritage assets at these sites is considered adequate.</p> |
| <p>Wording used in the description of how various heritage assets should be treated e.g. preserved/conserved etc, and their significance complies with National Policy and Guidance. No changes required.</p>   |
| <p>The requirement for a sensitively designed new bridge to assist in preserving and enhancing the character or appearance of the Chelmer and Blackwater Navigation Conservation Area and its setting has been added to the policy.</p>   |
| <p>The need to provide appropriate landscape buffers within the site to protect the settings of The Hammonds, Phillows and Rumbolds farmsteads which are within the site (the latter farmhouse being a non-designated heritage asset) has been added as a policy requirement.</p>   |
| <p>Reference to Boreham has been added to the policy requirement to protect and celebrate landmark views, including those to Danbury, Little Baddow and Sandon Churches.</p>  |
| <p>The need to provide substantial linear landscape buffers to retain the significance of the Hurrells Protected Lane and Graces Walk has been added as a policy requirement. Church Lane is identified within the 2010 Protected Lanes Study so is considered as such.</p>   |
| <p>The requirement for heritage trails has been expanded to also require ecological trails to be delivered. The need to recognise and celebrate the site's rich historic, social and natural history through such trails has also been added to this policy requirement.</p>  |
| <p>The Reasoned Justification has been expanded to ensure heritage, social history and natural environment celebration and interpretation plays a positive role in reinforcing local character and promoting heritage and understanding such as the works of renowned local nature writer J. A. Baker who has connections with this area.</p>   |
| <p>The need for development on the eastern and northern margins of the site to be lower density and landscaped to reflect a transition to the open countryside beyond has been added as a policy requirement.</p>   |
| <p>A further policy requirement to provide public art which contributes towards place creation and celebrates the historic, social and environmental context of the site and the local area has been added.</p>   |

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| <p>The need for the layout of the site to provide a strategy for responding to the National Grid Electricity Transmission overhead transmission lines present within the site has been added as a policy requirement with further guidance on this included within the Reasoned Justification.</p>   |
| <p>The design and layout of the site needing to incorporate appropriate safeguarding of suitable access for the maintenance of foul and surface water drainage infrastructure has also been added as a new policy requirement and set out in the Reasoned Justification.</p>   |
| <p>Financial contributions to the delivery of the Chelmsford North East Bypass (CNEB) has been removed as a policy requirement as the full CNEB is not required to support the Local Plan growth. Contributions towards, or the provision of, other sections of the CNEB are a requirement of site SGS6, 7a, 7b, 7c and 8 as they are directly related to the need for these sections.</p>   |
| <p>The policy requirement to provide a new active and sustainable route and bridge over the A12 to connect to Sandon Park and Ride has been amended for it to be 'close to' Sandon Park and Ride.</p>  |
| <p>The policy requirement for traffic calming measures has been expanded to clarify that this is to deter traffic on local roads from using Church Road and now also includes reference to Plantation Road and Main Road in Boreham.</p>   |
| <p>For clarity and consistence, reference to 'active' and sustainable transport has been added to the Reasoned Justification.</p>  |
| <p>The Council commissioned Essex Highways to review and consider the key issues raised in the highway and transportation responses received to the consultation. This is given in Appendix 2 and includes a review of the Transport Technical Note, prepared by Stomor (June 2024) on behalf of Little Baddow, Danbury, Boreham and Sandon Parish Councils. Essex Highways response has been used by CCC to understand and respond to matters of concern raised in this You Said We Did report and to inform the Pre-Submission Local Plan.</p> |
| <p>The highways modelling undertaken for the Local Plan is strategic and area-wide in nature. More detailed modelling to assess the impact of proposed development on the local road network and the detailed mitigation required to accommodate new trips associated with it, will be required and undertaken as part of the planning application process for allocated sites in the Local Plan.</p>  |
| <p>Updated junction modelling has been undertaken as part of the Pre-Submission Local Plan Highways Modelling Appraisal. Early concept development accesses onto the wider road network are also included in the latest Local Plan Pre-Submission modelling, based on outline developer proposals.</p>   |
| <p>Overall, the Pre-Submission Local Plan Highways Modelling Appraisal, undertaken by Essex Highways, concludes that by maximising the potential for sustainable accessibility to and from the sites along the A12 corridor, the impact on the strategic highway network should not be considered severe. However, continued discussions with National Highways will be necessary to best ensure that future development growth in Chelmsford can be supported by the strategic highway network over the long-term.</p>                          |
| <p>It is not within the practical scope of the Local Plan highways modelling to assess the scale of mitigation required along alternative sustainable corridors into the city centre from the Hammonds Farm site. However, the Local Plan transport modelling evidence base does recognise the need for a city centre sustainable access corridor study to be undertaken as part of the Hammonds Farm planning application, should proposals for a bus service to Beaulieu Rail Station be</p>   |

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| <p>compromised by access difficulties at the Boreham Interchange. No changes required.</p>   |
| <p>Site infrastructure requirement has been amended to require the provision or contributions towards other community facilities, including police, ambulance and fire and rescue facilities.</p>  |
| <p>The encouragement of appropriate development of renewable, low carbon and decentralised energy schemes, and mass waste collection systems within the site policy has been amended to state where these are deliverable and do not give rise to environmental or other amenity impacts. However, this remains something that will be encouraged and not required as there is insufficient evidence or policy to require this on site.</p>  |
| <p>As with the North East Chelmsford Garden Community a further policy requirement has been added to require stewardship activities to be in place in advance of the first housing occupations to ensure timely delivery of community development activities. Any further references to the requirements to stewardship arrangements will be determined through the relevant Stewardship Strategy, once agreed.</p>  |
| <p>As with other site allocations where there may be mineral recourses a Minerals Recourse Assessment is required to be undertaken. An initial assessment has been undertaken and additional wording added to the Reasoned Justification which acknowledges that 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.</p>   |
| <p>The plan is informed by an up to date and proportionate flood risk evidence base including Level 1 and 2 SFRAs and Sequential &amp; Exception Test supported by detailed modelling. The flood risk reports make use the most recent national policy and legislation available at the time of writing (Autumn 2024, pre the 12<sup>th</sup> December 2024 NPPF) and are informed by discussions with the Environment Agency, considers risks from all sources of flooding and include climate change modelling.</p>  |
| <p>In response to the Flood Risk Summary Statement prepared by Stomor (June 2024) on behalf of Little Baddow, Danbury, Boreham and Sandon Parish Councils, the Level 2 SFRA site summary table including the key messages section has been amended and updated. An updated site boundary has also been tested and included in the assessment.</p>  |
| <p>The new SFRA Level 2 site summary table for 16a assessed the site allocation boundary included within the Pre-Submission Local Plan. Except for the bridge across the Chelmer approximately 400m east of the A12 and an access road, no development is proposed in Flood Zones 2 and 3. The bridge and access road are classed as 'essential infrastructure and are therefore included in the assessment. At planning application stage, the site-specific Flood Risk Assessment (FRA) produced by the applicant will need to demonstrate that the bridge and access road will not increase flood risk elsewhere. As a water compatible use, the Country Park has not been assessed for flood risk.</p> |
| <p>Being a large strategic allocation, the wider site includes an area of flood risk. As shown on the Policies Map, development will only be located in areas at least risk of flooding. The areas at higher risk of flooding will form the country park, which will largely be natural in character, and other open space.</p>  |
| <p>As stated in the NPPF, the exception test is a method used to demonstrate that flood risk to people and property will be managed appropriately, where alternative</p>   |

sites at a lower flood risk are not available. The exception test is applied following the sequential test. The Sequential and Exception Test for this site has been informed by the Level 2 SFRA and IIA and has been updated to reflect updated information, the revised site boundary and considerations of reasonable alternatives as part of the IIA. This has informed the Pre-Submission Local Plan.

The Local Plan is informed by an Air Quality Assessment 2024 which overall concludes that the impact of the Local Plan in 2041 can be considered negligible for all pollutants.

The need to conserve and enhance biodiversity and wildlife sites is covered by the Policy requirement to Conserve and enhance biodiversity and avoid adverse effects on the River Chelmer, and Old Hare Wood local wildlife sites, Waterhall Meadows Essex Wildlife Trust Nature Reserve, and Long Spring Wood and Hall Wood ancient woodlands, and Blakes Wood, Danbury Common, and Lingwood Common. In addition, Policy DM16 requires all developments to conserve and enhance the network of habitats, species and sites (both statutory and non-statutory, including priority habitats and species) of international, national and local importance commensurate with their status and give appropriate weight to their importance. Collectively these requirements will ensure all habitats are protected appropriately. No further changes required.

The use of native species in planting on sites is set out in Policy DM16. The Plan should be read as a whole so it is not necessary to repeat this in site policies. No changes required.

Natural England has confirmed to CCC that they are not taking on any additional new Area of Outstanding Natural Beauty (AONB) designation projects at the current time. They have also advised that there is no formal application process for National Park or National Landscape (AONB) designation and that any future search will be England-wide. As such, the site allocation is not considered premature and Natural England are not objecting to the site allocation in principle. A copy of the Natural England letter confirming their position in December 2023 is attached at Appendix 3.

A full Plan Viability Assessment has been undertaken which shows the site, with the required infrastructure identified, is viable to develop. No changes required.

Where relevant design guidance in the Neighbourhood Plans for Little Baddow, Sandon and Danbury will be used to assist in masterplanning and planning application process for the site. No changes required.

To meet our development needs it is inevitable that some agricultural land will be used for development.

The site a greenfield site but not 'Green Belt' land, where different planning policy and guidance applies.

Policy S7 tested a range of reasonable alternative options and sites. Alternative spatial strategies and sites for allocation in the Local Plan are covered in more detail within the Spatial Strategy Topic Paper and IIA.

The detailed mix of employment uses and size and type of units will be determined through the masterplan process. No changes required.

The Housing Trajectory and timings within it are established through the Council's Five Year Housing Land Supply Methodology (April 2024). The Trajectory is updated annually, and the Pre-Submission Local Plan uses the latest available Housing Site Schedule (April 2024).

The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process.

Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.

### Strategic Growth Site 16b – Land adjacent to A12 Junction 18 Employment Area

Key statistics:

| Consultation point   | Yes | No   | Comments | Total number of responses |
|--|-----|------|----------|---------------------------|
| Strategic Growth Site 16b – Land adjacent to A12 Junction 18 Employment Area | 5   | 4331 | 4337     | 4348                      |

It should be noted that in some cases, members of the public raised similar points to stakeholders listed in brackets. This is especially the case in relation to comments made by Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group to this Strategic Growth Site which have been replicated and amplified by many individuals. To avoid duplication, these comments have not been repeated in the public comments. However, this does not affect the consultation process as this report focuses on the main issues received rather than the number of representations to any individual section of the plan.

Summary of Representations – main issues and suggested changes:

- Inconsistent with two very recently adopted neighbourhood plans (Little Baddow Neighbourhood Plan (2023) and the Sandon Neighbourhood Plan (2023)) as well as with the Reg 15 Submission Version of the emerging Danbury Neighbourhood Plan (2024)
- The site is not needed in the Plan, the housing numbers could be met by extending North East Chelmsford Garden Community
- Building more at North East Chelmsford Garden Community would be more suitable as it has the infrastructure in place already, and would preserve this rural area, its good quality farmland and protect the community here (Little Baddow Society, Danbury Parish Council)
- All of the previous five options included additional growth in North East Chelmsford Garden Community so why is development not going there
- The housing numbers are not needed until the end of the Plan period so it is premature to consider the site now
- Development should be on brownfield sites, not greenfield sites
- This is Green Belt land and should not be built on
- Green Belt land to the southwest of Chelmsford should be considered instead (Boreham Conservation Society)
- A continuation of development between Regiment Way and the route of the new NE Bypass to the West of Broomfield would be better (Boreham Conservation Society)
- The site is in an unsuitable location, detached from Chelmsford. Development would result in urban sprawl and there should be no development to the east of the A12 as it is a defensible boundary (Boreham Conservation Society)

- Unacceptable loss of high grade agricultural land (CPRE Essex, Boreham Conservation Society, Danbury Parish Council)
- There is no evidence showing actual land quality, only general agricultural land classifications have been provided (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- Additional crime in the area
- The site was not selected in the current adopted Local Plan and nothing has changed for the reasons it was not selected then, so it should not go ahead now (Danbury Parish Council)
- No evidence that a Gypsy and Traveller site is needed, and this is not a suitable location for one
- Support the cluster of employment opportunities coming forward at Locations 3, 16a and 16b that will help strengthen Chelmsford's economy (Wates Developments and Hammonds Estates LLP, CNG Fuels)
- Support for the range and types of uses in the allocation but consider it should be a minimum of 55,000 sqm, or state in the policy that more than 43,000 sqm will be supported where it can be successfully demonstrated as deliverable through the planning application processes (Pigeon (Sandon) Ltd)
- The site is in single ownership and there has been pre-application engagement so there is no need for the requirement for a masterplan in the policy. If the requirement remains request paragraph 7.386 is amended to read 'The development of the site will be subject of a masterplan agreed with the Council prior to the determination of a planning application' (Pigeon (Sandon) Ltd)
- Standardise the buildings within the site for sustainability and emphasise active travel movement to the site for employees from the local area (Great Baddow Parish Council)
- The site should provide employment for higher paid/skilled employment areas. In particular, Business Innovation Hub, Corporate Offices, Research and Development Centres, Co-Working Spaces, Incubators and Accelerators, High-Tech Manufacturing, commitments to apprenticeships and working with local schools to develop career pathways, and research and new methods of food production, to mitigate the decrease in agricultural land (Great Baddow Parish Council)
- Employment space should be closer to the City Centre with better transport links
- The employment space should be smaller than proposed
- Support for additional employment in the area
- Support Movement and Access bullet 2 that site access must be provided "in a manner that complements and does not prejudice access to East Chelmsford Garden Community (Hammonds Farm)" (Wates Developments and Hammonds Estates LLP)
- Site can come forward via an access which is completely independent of Hammonds Farm and does not prejudice access to Hammonds Farm. Notwithstanding, fully committed to working collaboratively with 16a to ensure site access arrangements and connections are deliverable in respect of both sites (Pigeon (Sandon) Ltd)
- Essex County Council's document 'SEND Sufficiency Plan For Engagement Autumn 2023' identifies a lack of special educational needs schools in the east of Essex. Due to the number of schools proposed at site 16a, consider

the development of a SEND school for children aged up to 16 years (and beyond if possible) to be located to the east of Chelmsford for the provision of children and young people in east Essex (Maldon District Council)

- Remove reference to early years and childcare nursery in paragraph 7.389 as there is not a policy requirement for one on this site (Essex County Council)
- No infrastructure in place to support this development (roads, healthcare – GPs and Hospitals, dentists, education, waste water and sewerage, emergency services) (Boreham Conservation Society, Woodham Walter Parish Council, Danbury Parish Council)
- There are opportunities to improve the National Cycle Network in the area, including improvements to NCN1 which has some significant issues deterring its use (Cycling UK)
- The proposed cycle route link to Boreham junction will be very important to provide an active travel link to Beaulieu Station, North Chelmsford and a link to the countryside for leisure cyclists and is a better alternative to the existing cycle route (Cycling UK)
- Site infrastructure requirements, bullet 1, amend to read ‘Provide safe and convenient 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)’ (Essex County Council)
- Pedestrian and cycle links to the south are not necessarily the most desirable in terms of connectivity and desire lines for movement. The policy should allow for greater flexibility including exploring options for links to the east of the site to connect to the wider road and footpath network (Pigeon (Sandon) Ltd)
- No suitable mitigation measures set out for transport/highways impacts (Little Baddow Society)
- There should be an emphasis of active and sustainable travel for workers on the site (Great Baddow Parish Council)
- Concern over the impact on A12 Junction 18 and if congested traffic will use local roads (Great Baddow Parish Council)
- The impact assessment indicates that the development in this location will cause issues on the A12 between J17 and J19, which National Highways has no plans to mitigate
- The proposed mitigation to reduce congestion on the A414 acknowledges that this will drive more rat-running through Little Baddow and Sandon, exacerbating an already significant problem
- Encourage ongoing discussions with the Public Transport Operator and the Local Highway Authority to assist with the continuing delivery of infrastructure in Growth Area 3 (Basildon Borough Council)
- Traffic congestion will impact wider Villages and areas such as Little Baddow, Great Baddow, Bicknacre, Danbury, Sandon and Boreham, Woodham Walter, as well as residents from Maldon (Chelmer Valley Landscape Group, Little Baddow Society, Boreham Conservation Society, Little Baddow History Centre, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Woodham Walter Parish Council, Danbury Parish Council)
- Unacceptable impact on the local (rat-running and congestion, including the A414 and Eves Corner) and strategic road (A12 capacity and junctions) networks with no evidence to support the proposal (Chelmer Valley



Landscape Group, Little Baddow Society, Boreham Conservation Society, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Woodham Walter Parish Council, Danbury Parish Council)

- Will result in delays along the A414 from Danbury for buses from SWF and Maldon unless dedicated bus lanes are factored into the road improvements along this section of the A414 (South Woodham Ferrers Residents Party, Danbury Parish Council)
- More traffic onto the A130/A12 causing further commuter delays at the Howe Green and Sandon junctions. There may also be negative effects on the use of the Sandon Park and Ride (South Woodham Ferrers Residents Party)
- Impact of wider projects including the Lower Thames crossing, A12 widening, Norwich to Tilbury Pylons, Bradwell power station on traffic flows has not been considered (Boreham Conservation Society)
- The impact of additional houses in North East Chelmsford Garden Community would be less on local roads and the A12 than this location
- No traffic modelling has taken place to support this site
- Traffic modelling evidence is insufficient and the impact of the proposed development on the main road network (A12 and A414) is highly likely to be severe (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Danbury Parish Council)
- The site currently floods, and this will be made worse both within and around the site if built on. This could impact rivers if suitable waste water/sewerage facilities are not sufficient to deal with flooding and climate change impacting the health of waterway users as well as pollution to wildlife (Chelmer Valley Landscape Group)
- Insufficient modelling has been undertaken to review the full effects of flood risk, including future climate change and if this will adversely affect flooding (Chelmer Valley Landscape Group, Little Baddow Society, Boreham Conservation Society, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Danbury Parish Council)
- Significant areas of the allocation lie within Flood Zone 2 and 3. The site allocation does not pass the sequential test as there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding
- Pollution and harm to the river environment from the development, including the Chelmer and Blackwater Navigation Landscape Conservation Area (Chelmer Valley Landscape Group, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Woodham Walter Parish Council)
- Additional pressure on the Chelmer and Blackwater Navigation for recreational purposes including walking, cycling, canoeing, paddle-boarding and boating as well as visitor parking without any proposals to provide improvements or mitigation (Chelmer Valley Landscape Group)
- The proposed new bridge will split the development in half, be unduly prominent in the river valley, create noise and moving visual intrusion, and be detrimental to the character and appearance of the designated Chelmer and Blackwater Navigation Conservation Area and views from Boreham House. No amount of landscape enhancement will mitigate the harm it will cause (Essex Waterways Ltd, Chelmer Valley Landscape Group, Boreham Conservation Society)

- Impact on users' enjoyment of existing footpaths and rivers for recreation and pleasure
- Harm to the rural landscape and urbanisation of the area, including Waterhall Meadow, an ancient flood meadow (CPRE Essex, Little Baddow Society, Boreham Conservation Society, Danbury Parish Council)
- The impact on the landscape would be damaging and hard to mitigate (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- Increased air pollution
- Harm to the natural environment and protected areas of wildlife/habitats in the vicinity (CPRE Essex, Essex Wildlife Trust, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- Harm to wildlife in the area and loss of habitat for species including, muntjac, bats, badgers, foxes, birds (Little Baddow Society, Boreham Conservation Society, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- There are several areas of Lowland Mixed Deciduous Woodland, which are Priority Habitat Woodland, within or adjacent to the site which need to be considered. Lowland Mixed Deciduous Woodlands are on the Priority Habitat Inventory, England. Fragmentation of woodland reduces its ecological value and woodlands can suffer loss or deterioration from development nearby (Forestry Commission England)
- Any planning application for major residential development at the East Chelmsford Growth location should be required to include a robust assessment of the residual recreational impact of the development on the nearby SSSI's, local wildlife sites and ancient woodlands, and that mitigation measures are included where appropriate. This should take account of cumulative development in the area (Essex Wildlife Trust, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- The site has been submitted for consideration for it to be designated as an Area of Outstanding Natural Beauty/National Landscape and proposals for development are premature until this has been considered by Natural England (Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group, Danbury Parish Council)
- Supportive of the Historic and Natural Environment, and Design and Layout principles (Pigeon (Sandon) Ltd)
- A Heritage Impact Assessment (HIA) should be undertaken in advance of Regulation 19 to determine whether the site is suitable for allocation, to inform its capacity, and to identify any necessary mitigation and enhancement measures. If the site is deemed suitable, incorporate any mitigation and enhancement measures into the site policy (Historic England)
- Impact on heritage and archaeological assets in the area (Little Baddow Society, Little Baddow History Centre, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)
- It is not yet known whether the site contains a viable minerals resource that would require extraction prior to development (Little Baddow Society, Little Baddow History Centre, Little Baddow, Boreham, Danbury and Sandon Parish Council Cross Working Group)

- The site falls below the threshold for the need to carry out a Minerals Resource Assessment so remove requirement from the site policy (Essex County Council)
- Houses should not be built close to the pylons on site
- Support for the provision of open spaces, sports, and physical activity provided in the policy (Sport England)
- The delivery of Site 16b is conditional upon the masterplan of Site 16a, and consequently the expectation of delivery by 2030 maybe unrealistic (Greystoke CB)
- Buildings should be sustainably built (Great Baddow Parish Council)
- A Waste Infrastructure Assessment is not required as the affected area will fall outside of the proposed red line boundary for future planning applications (Pigeon (Sandon) Ltd)
- Joint working between the Councils is needed to ensure there are no detrimental impacts on Basildon Borough and its residents from development in Growth Area 3 (Basildon Borough Council).

| <b>CCC response to the comments made</b>   |
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| This site is for an employment allocation and matters raised which relate to housing or other issues directly within or relating specifically to Site 16a are covered in the feedback for Site 16a.  |
| The policy requirement to protect important views into and through the site from across the Chelmer Valley has been expanded to also include reference to Danbury Ridge.   |
| The policy requirement to mitigate the visual impact of the development has been expanded to include the impact of lighting.   |
| The policy requirement to provide for a mix of building sizes and styles including building design measures to soften visual impact has been expanded to ensure layout, scale, massing and materials are included in this consideration.   |
| The Landscape Sensitivity and Capacity Study 2024 notes that the site has moderate overall landscape sensitivity rating, with a low landscape value rating, and medium to high overall capacity rating. The policy includes requirements to conserve and enhance the local landscape character and has been amended to identify further views to be protected and measures to soften the developments visual impact. |
| As with all other relevant site allocations the requirement for a masterplan to be agreed with the Council prior to the submission of a planning application has been amended to be required prior to the determination of a planning application.   |
| All site allocation figure is 'around' and would allow for more units to come forward if the site can accommodate it in a sustainable manner. This is the approach used consistently through the Plan. No changes required.  |
| The policy requirement to provide safe and convenient pedestrian and cycle connections has been expanded to include connection within the site and to the wider area including to local bus stops, Sandon Park and Ride, Woodhill Road, routes associated with the East of Chelmsford allocations including East Chelmsford Garden Community (Hammonds Farm) and Danbury and the east of the site.                   |
| The requirement for a Waste Infrastructure Assessment has been removed following advice from the Waste Authority (ECC), as the entrance to site 16B is not within 250m of the Waste Consultation Area for Sandon Quarry.   |

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| <p>Suitable brownfield sites have been allocated within the Urban Area. There are not sufficient brownfield sites to meet the Local Plan's development requirements so greenfield sites must be allocated.</p>   |
| <p>The site is allocated for the needs and uses as identified in the Council's Employment Land Review. For this site that is Use Classes E(g)(i-iii), B2 and B8. This site policy also allows for other appropriate ancillary employment generating uses so provides flexibility for a range of suitable uses. No changes required.</p>  |
| <p>Reference to early years and childcare nursery in the Reasoned Justification has been removed as ECC has confirmed that there is not a requirement for one on this site.</p>  |
| <p>The infrastructure necessary to support this site allocation is set out within the site policy and Policy S9. Relevant changes have been made to these policies based on the infrastructure needs identified in the updated IDP.</p>  |
| <p>The Council undertook various Heritage Impact Assessments to inform the Local Plan, with a specific assessment being undertaken for the Hammonds Farm site and wider area which covers 16b. Reference to heritage assets which require consideration are included in the policy requirements and Reasoned Justification. No changes required.</p>   |
| <p>CCC has raised the consideration of a special educational needs (SEND) school with ECC through the Duty to Cooperate. More certainty would be needed on the type of provision needed and the fit with ECC's overall strategy. Not enough detailed evidence to change the Plan currently, but CCC will review after Pre-Submission consultation.</p>   |
| <p>Financial contributions to the delivery of the Chelmsford North East Bypass (CNEB) has been removed as a policy requirement as the full CNEB is not required to support the Local Plan growth. Contributions towards, or the provision of, other sections of the CNEB are a requirement of site SGS6, 7a, 7b, 7c and 8 as they are directly related to the need for these sections.</p>   |
| <p>The Council commissioned Essex Highways to review and consider the key issues raised in the highway and transportation responses received to the consultation. This is given in Appendix 2 and includes a review of the Transport Technical Note, prepared by Stomor (June 2024) on behalf of Little Baddow, Danbury, Boreham and Sandon Parish Councils. Essex Highways response has been used by CCC to understand and respond to matters of concern raised in this You Said We Did report and to inform the Pre-Submission Local Plan.</p> |
| <p>The highways modelling undertaken for the Local Plan is strategic and area-wide in nature. More detailed modelling to assess the impact of proposed development on the local road network and the detailed mitigation required to accommodate new trips associated with it, will be required and undertaken as part of the planning application process for developments identified as preferred sites in the Local Plan.</p>   |
| <p>Updated junction modelling has been undertaken as part of the Pre-Submission Local Plan Highways Modelling Appraisal. Early concept development accesses onto the wider road network are also included in the latest Local Plan Pre-Submission modelling, based on outline developer proposals.</p>   |
| <p>Overall, the Pre-Submission Local Plan Highways Modelling Appraisal, undertaken by Essex Highways, concludes that by maximising the potential for sustainable accessibility to and from the sites along the A12 corridor, the impact on the strategic highway network should not be considered severe. However, continued discussions with National Highways will be necessary to best ensure that future</p>   |

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| development growth in Chelmsford can be supported by the strategic highway network over the long-term.  |
| As with other site allocations where there may be mineral resources a Minerals Resource Assessment is required to be undertaken. No changes required.   |
| CCC has raised the consideration of a special educational needs (SEND) school with ECC through the Duty to Cooperate. More certainty would be needed on the type of provision needed and the fit with ECC's overall strategy. Not enough detailed evidence to change the Plan currently, but CCC will review after Pre-Submission consultation.   |
| The plan is informed by an up to date and proportionate flood risk evidence base including Level 1 and 2 SFRAs and Sequential & Exception Test supported by detailed modelling. The flood risk reports make use of the most recent national policy and legislation available at the time of writing (Autumn 2024, pre the 12 <sup>th</sup> December 2024 NPPF) and are informed by discussions with the Environment Agency, considers risks from all sources of flooding and include climate change modelling of surface water risk and fluvial risk from Sandon Brook.                               |
| As stated in the NPPF, the exception test is a method used to demonstrate that flood risk to people and property will be managed appropriately, where alternative sites at a lower flood risk are not available. The exception test is applied following the sequential test.   |
| The Local Plan is informed by an Air Quality Assessment 2024 which overall concludes that the impact of the Local Plan in 2041 can be considered negligible for all pollutants.   |
| Natural England has confirmed to CCC that they are not taking on any additional new Area of Outstanding Natural Beauty (AONB) designation projects at the current time. They have also advised that there is no formal application process for National Park or National Landscape (AONB) designation and that any future search will be England-wide. As such, the site allocation is not considered premature and Natural England are not objecting to the site allocation in principle. A copy of the Natural England letter confirming their position in December 2023 is attached at Appendix 3. |
| Where relevant design guidance in the Sandon Neighbourhood Plan will be used to assist in the Masterplanning and planning application process for the site. No changes required.  |
| To meet our development needs it is inevitable that some agricultural land will be used for development.  |
| The site is a greenfield site but not 'Green Belt' land, where different planning policy and guidance applies.  |
| Policy S7 tested a range of reasonable alternative options and sites. Alternative spatial strategies and sites for allocation in the Local Plan are covered in more detail within the Spatial Strategy Topic Paper and IIA.   |
| The delivery of Site 16b is not conditional upon the masterplan of Site 16a. They can come forward independently of one another. The expected delivery timeframe is therefore considered reasonable. No changes required.   |
| The policy requires the development to avoid ecological impacts and provide on-site ecological mitigation, compensation and enhancement measures. With the Reasoned Justification setting out that ecological assets on the site shall be maintained and enhanced, with the local wildlife sites Old Hare Wood to the north east and Sandon Pit to the south being protected. The design of the scheme should also enhance and protect Sandon Brook, which runs along the eastern   |

boundary of the site, and which is recognised as being important for biodiversity. No changes required.

Relevant buildings on site will be required to be built in accordance with Policy DM31 to ensure they are built in a sustainable manner. The Plan should be read as a whole, so no changes required.

### Location 10 – South Woodham Ferrers

Key statistics:

| Consultation point                  | Yes | No | Comments | Total number of responses |
|-------------------------------------|-----|----|----------|---------------------------|
| Location 10 – South Woodham Ferrers | 2   | 5  | 25       | 25                        |

Summary of Representations – main issues and suggested changes:

- Support expressed (Sport England)
- Traffic concerns from this site and other sites proposed in both Chelmsford and Maldon
- Proposed capacity improvements on A132/B1012 are not sufficient
- Retail offer in SWF is limited, increasing the retail offering would provide employment opportunities
- Improve bus services that connect to Chelmsford, Baddow, Danbury and Bicknacre and employment areas
- Better pedestrian and cycle connection is needed including safe crossing points on Burnham Road
- Rail service is at capacity with little or no potential for future expansion (South Woodham Ferrers Residents Party)
- Increase inclusivity for accessibility and teens/young adults
- Flooding concerns
- New education and healthcare facilities are needed
- Habits have changed following Covid. Use more brownfield sites for housing need and retain green space for future generations and wildlife (South Woodham Action Group)
- Create a public woodland north of the site managed in perpetuity to encourage habitat improvement and countryside access (South Woodham Ferrers Residents Party)
- Minor policy change suggested to policy and supporting text to add ‘and police facilities as required by Essex Police’ (Essex Police)
- Refer to ‘multifunctional’ green infrastructure to ensure consistency throughout the Plan (Essex County Council)
- Amend to reflect the provision of proportionate financial contributions towards the co-located primary and early years nursery (Essex County Council)
- Refer to active and sustainable travel (Essex County Council)
- Provide a safe traffic free environment around school pedestrian entrances in line with in ECC’s Developers’ Guide to Infrastructure Contributions (Essex County Council)

- Support expressed but policy should remain generic in terms of its requirements including around 1,200 homes, around 1,000 sqm, avoid 'maximise', and for proposals to generally accord with an approved masterplan (Vistry Group)
- Amend to ensure CIL compliant requirements and reflect evidence provided with the recent planning application in terms of infrastructure (Vistry Group)
- There is limited capacity for growth at SWF Water Recycling Centre. Policy should require the need to demonstrate sufficient capacity for wastewater treatment and disposal to serve the site, including sewer connections and mitigation within the sewerage network (Anglian Water)
- The South East (Inshore) Marine Plan must be considered and a Marine Conservation Zone (MCZ) assessment may need to be undertaken. Project-level Habitats Regulations Assessment (HRA) must consider all impacts taken alone or in combination (Natural England)
- Refer to the marine/coastal/intertidal element particularly where both terrestrial and marine habitats have the potential to be impacted by the policy and interpretation of the South East Marine Plan (Marine Management Organisation)
- Expand policy to require the development to prepare a strategy for responding to the National Grid Electricity Transmission plc (NGET) overhead transmission lines within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design (National Grid Electricity Transmission).

| <b>CCC response to the comments made</b>   |
|--|
| Reference added to the Policy relating to layout responding to overhead transmission lines.  |
| Changing the requirement from maximising sustainable travel would make the policy less effective; reference added to active and sustainable travel.  |
| The Policy and Reasoned Justification have been adjusted to refer to facilities alongside infrastructure, and to police, ambulance and fire and rescue.  |
| Text relating to provision of education has been clarified.  |
| Any revised or subsequently approved masterplan would be the relevant and up to date masterplan against which development proposals would be assessed.   |
| Infrastructure requirements are sufficiently flexible to accommodate on-site provision or financial contributions.   |
| Reference to marine and terrestrial planning is addressed in Section 1 – adding here would be repetition.  |
| Policy amended to demonstrate that there is sufficient capacity for wastewater treatment and disposal to serve the site, including any associated sewer connections and any required mitigation within the sewerage network.   |
| The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.  |
| The amount and type of development reflects the resolution to grant planning permission and the number is reflected in the 5 year Housing Sites Schedule April 2024. If this permission is not implemented and a new proposal comes forward, the site capacity will be considered on its individual merit. |

### Location 11 – Bicknacre

#### Growth Site 11a – South of Bicknacre

Key statistics:

| <b>Consultation point</b>            | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--------------------------------------|------------|-----------|-----------------|----------------------------------|
| Growth Site 11a – South of Bicknacre | 1          | 2         | 8               | 8                                |

Summary of Representations – main issues and suggested changes:

- Support for 42 new homes whilst acknowledging the adopted plan was for 35 new homes (Woodham Ferrers and Bicknacre Parish Council)
- The site is near Thrift Wood SSSI and all identified impacts on the designated features of the SSSI will need to be considered. The cumulative effect on Thrift Wood SSSI of all the Bicknacre sites should be considered (Natural England)
- Minor policy changes suggested relating to green and blue infrastructure, education provision and pedestrian and cycle connections (Essex County Council)
- There are woodlands on the site or nearby including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Decisions should be made in line with the NPPF. The Council is also referred to Natural England and Forestry Commission's Standing Advice on Ancient Woodland (Forestry Commission England)
- Amend to reflect what has occurred on site, including the removal of large sections of hedgerow along the Main Road
- Insufficient infrastructure to support the development, including lack of public transport, the condition of roads and capacity at doctors' surgery
- Will place further strain on existing facilities
- Traffic, congestion, noise, light and road safety concerns during the construction phase of the development.

#### **CCC response to the comments made**

The site has been built-out as is therefore deleted from the plan.

### Growth Site 11b – Land at Kingsgate, Bicknacre

Key statistics:

| <b>Consultation point</b>                      | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Growth Site 11b – Land at Kingsgate, Bicknacre | 0          | 54        | 64              | 64                               |

Summary of Representations – main issues and suggested changes:



- Object to the allocation. Reasons include the requirement for further housing in Bicknacre has already been satisfied since the adoption of the existing Local Plan (2020) and we are discussions to find an affordable housing site; any further housing need could be accommodated at Hammonds Farm or elsewhere; flooding concerns and drainage capacity and loss of Grade 3 agricultural land (Woodham Ferrers and Bicknacre Parish Council)
- All Bicknacre sites should take account of the cumulative effect on Thrift Wood SSSI (Natural England)
- There are woodlands on the site or nearby including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Decisions should be made in line with the NPPF. The Council is also referred to Natural England and Forestry Commission's Standing Advice on Ancient Woodland (Forestry Commission England)
- The site is approximately 300m of Bicknacre Priory Scheduled Monument. A Heritage Impact Assessment (HIA) should be undertaken in advance of Regulation 19 to determine whether the site is suitable for allocation, to inform its capacity, and to identify any necessary mitigation and enhancement measures. If the site is deemed suitable it is expected that mitigation and enhancement measures are incorporated into the Policy (Historic England)
- Minor policy changes suggested relating to education provision for clarification and consistency (Essex County Council)
- Insufficient infrastructure to support the development, including lack of public transport, police and fire services, the condition of roads and capacity at doctors' surgery and the school
- Will place further strain on existing facilities and utilities
- Bicknacre has met its housing requirement with circa. 77 new homes being built/under construction and further affordable housing may be delivered – the village does not need more housing/there is sufficient housing to meet local need
- Increase in traffic, congestion and on street parking and the degradation of the condition of existing roads – concerns on pedestrian and road safety and quality of life
- Impact on settlement character and the community
- Concerns on flooding, including Sandon Brook overflowing
- Drainage issues/lack of capacity and sewerage concerns
- Loss of agricultural land
- Impact on wildlife and their habitats
- Noise and air pollution impacts – Chelmsford's Air Quality Strategy June 2022 is out of date and air pollution is likely to increase
- Concerns on pedestrian safety, including children and the vulnerable and the lack of/suitable existing footways within the village
- Impact on adjacent bridleway
- Concerns on antisocial behaviour
- Traffic, congestion, noise, light and road safety concerns during the construction phase of the development.

**CCC response to the comments made**

|   |
|---|
| The site allocation is supported by the plan evidence base including a Strategic Flood Risk Assessment, Landscape Sensitivity and Capacity Study 2024 and traffic modelling. The Small Sites Planning Briefs/Concept Framework 2024 considers that there are no overriding site constraints which mean that the site is unsuitable or undeliverable.            |
| The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.   |
| To meet our development needs it is inevitable that some agricultural land will be used for development.  |
| Site policy includes new requirements to undertake an archaeological assessment and to assess, and where appropriate mitigate, the potential cumulative effect on the designated features of Thrift Wood SSSI.  |
| The 'small sites' (under 1ha) are an important part of the Plan to ensure delivery of a variety of sites in a timely manner, and to meet NPPF requirements to provide 10% of small sites. The enlargement of these sites would be likely to put greater pressure on local facilities and infrastructure which could make such sites unsuitable for development. |
| Heritage Impact Assessments have been undertaken and were published alongside the Preferred Options Local Plan. Site policies consider significance of designated and non-designated heritage assets.   |
| The site policy requires financial contributions to services and facilities including education and healthcare provision, and to provide appropriate improvements, as necessary to the local and strategic road network.  |
| The Local Plan is informed by an Air Quality Assessment 2024 which overall concludes that the impact of the Local Plan in 2041 can be considered negligible for all pollutants.   |
| Policy DM17 provides protection for preserved woodlands.  |
| Minor policy amendment made in respect to requirements for education provision.   |

### Growth Site 11c – Land West of Barbrook Way, Bicknacre

Key statistics:

| Consultation point                                     | Yes | No  | Comments | Total number of responses |
|--|-----|-----|----------|---------------------------|
| Growth Site 11c – Land West of Barbrook Way, Bicknacre | 0   | 104 | 123      | 123                       |

Summary of Representations – main issues and suggested changes:

- Support in principle but a greater site area and quantum of development should be allocated. The allocation ignores the Council's evidence base of the site's suitability and sustainability to deliver more houses – the wording of the policy is not justified or effective (Wellbeck Strategic Land V Limited)
- Consider the criteria of the Strategic Housing and Employment Land Availability Assessment has been applied inconsistently – the site should score higher (Wellbeck Strategic Land V Limited)
- Object to the allocation. Reasons include the requirement for further housing in Bicknacre has already been satisfied since the adoption of the existing Local Plan (2020) and we are discussions to find an affordable housing site; any further

housing need could be accommodated at Hammonds Farm or elsewhere; flooding concerns and drainage capacity; loss of Grade 3 agricultural land and there is a ransom strip between Barbrook Way and the site so the site is not deliverable (Woodham Ferrers and Bicknacre Parish Council)

- All Bicknacre sites should take account of the cumulative effect on Thrift Wood SSSI (Natural England)
- There are woodlands on the site or nearby including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Decisions should be made in line with the NPPF. The Council is also referred to Natural England and Forestry Commission's Standing Advice on Ancient Woodland (Forestry Commission England)
- Development would not affect any designated heritage assets (Historic England)
- Minor policy changes suggested relating to education provision for clarification and consistency (Essex County Council)
- Insufficient infrastructure to support the development, including lack of public transport, police and fire services, the condition of roads and capacity at doctors' surgery and the school
- Will place further strain on existing facilities and utilities
- Bicknacre has met its housing requirement with circa. 77 new homes being built/under construction and further affordable housing may be delivered – the village does not need more housing/there is sufficient housing to meet local need
- Increase in traffic, congestion and on street parking and the degradation of the condition of existing roads – concerns on pedestrian and road safety and quality of life
- Impact on settlement character and the community
- Concerns on flooding, including Sandon Brook overflowing
- Drainage issues/lack of capacity and sewerage concerns
- Loss of Grade 3 agricultural land – the site has always been used for animal grazing
- Impact on wildlife and their habitats
- Disagree with the site's rating in the Strategic Housing and Employment Land Availability Assessment – it has been incorrectly scored and should be lower
- Impact on neighbour amenity
- Junction/road safety concerns, including the location of the drop off point of The Sandon School bus at Barbrook Way/Priory Road
- Noise and air pollution impacts – Chelmsford's Air Quality Strategy June 2022 is out of date and air pollution is likely to increase
- Concerns on pedestrian safety, including children and the vulnerable and the lack of/suitable existing footways within the village
- There is a ransom strip at the entrance at the site – the site is not deliverable
- Site contributes to community wellbeing
- Concerns on soil composition and subsidence
- There is a water main running through the site – homes cannot be built on this or within its easements
- Concerns for protected trees within and near the site
- Concerns on antisocial behaviour

- Heritage impacts
- Traffic, congestion, noise, light and road safety concerns during the construction phase of the development.

| <b>CCC response to the comments made</b>  |
|---|
| The site allocation is supported by the plan evidence base including a Strategic Flood Risk Assessment, Landscape Sensitivity and Capacity Study 2024 and traffic modelling. The Small Sites Planning Briefs/Concept Framework 2024 considers that there are no overriding site constraints which mean that the site is unsuitable or undeliverable.            |
| The Local Plan is informed by an Air Quality Assessment 2024 which overall concludes that the impact of the Local Plan in 2041 can be considered negligible for all pollutants.   |
| The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.   |
| The Council is confident that the site can be accessed from Barbrook Way and that the site is deliverable – see Appendix 4 for a letter from the site promoters' Welbeck Land.  |
| To meet our development needs it is inevitable that some agricultural land will be used for development.  |
| Site policy includes new requirements to undertake an archaeological assessment and to assess, and where appropriate mitigate, the potential cumulative effect on the designated features of Thrift Wood SSSI.  |
| The 'small sites' (under 1ha) are an important part of the Plan to ensure delivery of a variety of sites in a timely manner, and to meet NPPF requirements to provide 10% of small sites. The enlargement of these sites would be likely to put greater pressure on local facilities and infrastructure which could make such sites unsuitable for development. |
| Heritage Impact Assessments have been undertaken and were published alongside the Preferred Options Local Plan. Site policies consider significance of designated and non-designated heritage assets.   |
| The site policy requires financial contributions to services and facilities including education and healthcare provision, and to provide appropriate improvements, as necessary to the local and strategic road network.  |
| Policy DM17 provides protection for preserved woodlands.  |
| The site policy requires the retention of existing natural landscaping and trees on the boundary of the site.   |
| Minor policy amendment relating to requirements for education provision.  |

#### Location 12 – St Giles, Bicknacre

#### Growth Site 12 – St Giles, Moor Hall Lane, Bicknacre

Key statistics:

| <b>Consultation point</b>                            | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Growth Site 12 – St Giles, Moor Hall Lane, Bicknacre | 1          | 1         | 5               | 5                                |

Summary of Representations – main issues and suggested changes:

- Support the allocation (Woodham Ferrers and Bicknacre Parish Council)
- Minor policy changes suggested relating to ‘multifunctional’ green infrastructure and pedestrian and cycle connections (Essex County Council)
- All Bicknacre sites should take account of the cumulative effect on Thrift Wood SSSI (Natural England)
- Limited existing infrastructure to support the development, including public transport, the condition of road and capacity at doctors’ surgery
- Will place further strain on existing facilities.

| <b>CCC response to the comments made</b>   |
|--|
| Minor policy wording changes to refer to ‘multifunctional’ green infrastructure and to ‘safe and convenient’ pedestrian and cycle connections.   |
| Site policy includes new requirements to undertake an archaeological assessment and to assess, and where appropriate mitigate, the potential cumulative effect on the designated features of Thrift Wood SSSI. |
| The site policy requires financial contributions to services and facilities including healthcare provision, and to provide appropriate improvements, as necessary to the local and strategic road network.     |
| The site policy requires the development is provide, or make financial contributions to, new or enhanced sport, leisure and recreation facilities.   |

Location 13 – Danbury

Strategic Growth Site Policy 13 – Danbury

Key statistics:

| <b>Consultation point</b>                 | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---|------------|-----------|-----------------|----------------------------------|
| Strategic Growth Site Policy 13 – Danbury | 1          | 3         | 9               | 9                                |

Summary of Representations – main issues and suggested changes:

- Add additional text in relation to safe and convenient pedestrian and cycle connections, and active and sustainable travel (Essex County Council)
- Include reference to traffic management measures at Eves Corner (Essex County Council)
- Add reference to the proximity to proposed schools and social infrastructure offered by the Hammonds Farm proposal (Wates Developments and Hammonds Estates LLP)
- Recommend an additional policy to recognise the cumulative recreational pressure on SSSIs and wildlife sites (Natural England)
- There are woodlands on or in proximity to the allocation including Ancient Semi Natural Woodland, Plantations on Ancient Woodland Sites and Priority Habitat Woodland. Decisions should be made in line with the NPPF and the

Council is referred to the Natural England and Forestry Commission's Standing Advice on Ancient Woodland (Forestry Commission England)

- Allocation is welcomed but it could deliver a greater number of homes (Martin Grant Homes)
- New housing could come forward in Danbury outside of the Neighbourhood Plan process if housing needs are not being met within an expected timeframe (Richborough)
- Concern about the recreational pressure and physical damage on vulnerable sites and land within the National Trust's ownership (National Trust)
- Additional site is promoted off Runsell Lane (Gleeson Land).

| <b>CCC response to the comments made</b>   |
|--|
| Bullet added to require contributions towards addressing cumulative recreational pressure on SSSIs in proximity to sites; and Reasoned Justification clarified on how measures will be costed. |
| Reference added to safe and convenient pedestrian and cycling connections.   |
| Text relating to traffic management measures at Eves Corner has been updated.  |
| Policies S4 and DM17 protects sites of international, national, regional and local nature conservation importance including Ancient Woodlands.   |
| The allocation of around 100 homes is supported by the plan evidence base including a Strategic Flood Risk Assessment, Landscape Sensitivity and Capacity Study 2024 and traffic modelling.    |
| Policy has been expanded to require contributions towards addressing cumulative recreational pressure on SSSIs in proximity to the site.   |

#### Location 17 – East Hanningfield

#### Growth Site 17a – Land North of Abbey Fields, East Hanningfield

Key statistics:

| <b>Consultation point</b>                                       | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---|------------|-----------|-----------------|----------------------------------|
| Growth Site 17a – Land North of Abbey Fields, East Hanningfield | 1          | 16        | 18              | 18                               |

Summary of Representations – main issues and suggested changes:

- Support the allocation and policy requirements, subject to the relevant legislation and planning policy (Chelmsford Diocese Board of Finance)
- A greater quantum of development may be possible on the site (Chelmsford Diocese Board of Finance)
- The delivery of site could be within two years of the adoption of the Local Plan (Chelmsford Diocese Board of Finance)
- Development would not affect any designated heritage assets (Historic England)
- Minor policy changes suggested relating to education provision for clarification and consistency (Essex County Council)
- Development would be out of keeping with the existing settlement pattern

- Impact on local services
- Lack of public transport
- Site access is below standards
- Junction/road safety concerns
- Concerns on flooding
- Increase/exacerbation of traffic, congestion and on street parking in Abbey Fields
- No sewerage capacity
- Loss of wildlife habitat/impact on biodiversity, trees (including preserved trees) and landscaping
- Noise and pollution impacts
- A right of access by the owners of the adjacent field may impact on the allocation.

| <b>CCC response to the comments made</b>  |
|---|
| Minor policy amendment relating to requirements for education provision.  |
| The site allocation is supported by the plan evidence base including Strategic Flood Risk Assessments, Water Cycle Studies, Landscape Sensitivity and Capacity Study, new Air Quality Assessment and traffic modelling. The Small Sites Planning Briefs/Concept Framework 2024 considers that there are no overriding site constraints which mean that the site is unsuitable or undeliverable. |
| The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.   |
| The 'small sites' (under 1ha) are an important part of the Plan to ensure delivery of a variety of sites in a timely manner, and to meet NPPF requirements to provide 10% of small sites. The enlargement of these sites would be likely to put greater pressure on local facilities and infrastructure which could make such sites unsuitable for development.                                 |
| Heritage Impact Assessments have been undertaken and were published alongside the Preferred Options Local Plan. Site policies consider significance of designated and non-designated heritage assets.   |
| The site policy requires financial contributions to services and facilities including education and healthcare provision, and to provide appropriate improvements, as necessary to the local and strategic road network.  |
| The site policy requires the character, scale and layout of the development to have regard and respond to the site's surrounding context.   |
| The site policy requires the retention of existing natural landscaping and trees in and on the boundary of the site.  |

#### Growth Site Policy 17b – Land East of Highfields Mead, East Hanningfield

Key statistics:

| <b>Consultation point</b>  | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Growth Site Policy 17b – Land East of Highfields Mead, East Hanningfield | 1          | 15        | 18              | 18                               |

Summary of Representations – main issues and suggested changes:

- Support the allocation (Hawridge Land and Mrs A Mossman)
- The allocation boundary should reflect the total site area (circa 1.25ha) and the quantum of housing should be flexible/increased (circa 30-35 dwellings) to maximise the site’s deliverability (Hawridge Land and Mrs A Mossman)
- Development would not affect any designated heritage assets (Historic England)
- Minor policy changes suggested relating to education provision for clarification and consistency (Essex County Council)
- Limited existing infrastructure to support the development, including public transport and capacity at doctors’ surgery and school
- Loss of wildlife habitat/impact on biodiversity, trees and landscaping
- Increase in traffic, congestion and on street parking
- Concerns on pedestrian safety
- Concerns on flooding and drainage
- Impact on settlement character
- Impact on neighbour amenity
- No sewerage and water capacity
- Noise and pollution impacts.

| <b>CCC response to the comments made</b>  |
|---|
| The site allocation is supported by the plan evidence base including Strategic Flood Risk Assessments, Water Cycle Studies, Landscape Sensitivity and Capacity Study, new Air Quality Assessment and traffic modelling. The Small Sites Planning Briefs/Concept Framework 2024 considers that there are no overriding site constraints which mean that the site is unsuitable or undeliverable. |
| The latest highway modelling does not consider the overall impact on the local or strategic highway network will be severe.   |
| The ‘small sites’ (under 1ha) are an important part of the Plan to ensure delivery of a variety of sites in a timely manner, and to meet NPPF requirements to provide 10% of small sites. The enlargement of these sites would be likely to put greater pressure on local facilities and infrastructure which could make such sites unsuitable for development.                                 |
| Heritage Impact Assessments have been undertaken and were published alongside the Preferred Options Local Plan. Site policies take into account significance of designated and non-designated heritage assets.  |
| The site policy requires financial contributions to services and facilities including education and healthcare provision, and to provide appropriate improvements, as necessary to the local and strategic road network.  |
| The site policy requires the retention of existing natural landscaping and trees on the boundary of the site.   |
| Minor policy amendment relating to requirements for education provision.  |

Special Policy Areas (SPA)

Key statistics:



| <b>Consultation point</b>                             | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---|------------|-----------|-----------------|----------------------------------|
| Special Policy Areas (paragraphs 7.464-7.465)         | 0          | 0         | 0               | 0                                |
| SPA1 – Broomfield Hospital Special Policy Area        | 0          | 1         | 1               | 1                                |
| SPA2 – Chelmsford City Racecourse Special Policy Area | 0          | 0         | 1               | 1                                |
| SPA3 – Hanningfield Reservoir Special Policy Area     | 0          | 1         | 3               | 3                                |
| SPA4 – RHS Hyde Hall Gardens Special Policy Area      | 0          | 0         | 2               | 2                                |
| SPA5 – Sandford Mill Special Policy Area              | 1          | 0         | 3               | 3                                |
| SPA6 – ARU Writtle Special Policy Area                | 2          | 1         | 7               | 7                                |

### SPA1 – Broomfield Hospital Special Policy Area

Summary of Representations – main issues and suggested changes:

- Support SPA rationale. Designate the former BAE Systems site as a SPA given its unique and historical context and potential need to provide future specialist electronic technology floorspace related to defence (Rosehart Properties Ltd).

### SPA2 – Chelmsford City Racecourse Special Policy Area

Summary of Representations – main issues and suggested changes:

- For consistency with other parts of the plan, amend policy to refer to ‘active and sustainable means of travel’ (Essex County Council).

### SPA3 – Hanningfield Reservoir Special Policy Area

Summary of Representations – main issues and suggested changes:

- Welcome involvement early in application process to comment on details of avoidance and mitigation measures deemed necessary for proposed developments that may impact on Hanningfield Reservoir SSSI (Natural England)
- Support SPA policy approach but expand policy to include proposals for renewable energy which would reduce reliance on the grid and contribute towards achieving climate change goals (Essex & Suffolk Water)
- Remove policy requirement to show a demonstrable need for a renewable energy scheme as the treatment works is a regulated industry (Essex & Suffolk Water)
- Delete requirement for very special circumstances for water infrastructure and ancillary development to demonstrable need and be directly associated with

the role, function and operation of the operation of the site (Essex & Suffolk Water)

- Include new text to support, in principle, appropriate proposals including additional infrastructure requirements linking the site to the wider water infrastructure network, renewable energy and leisure activities (Essex & Suffolk Water).

#### SPA4 – RHS Hyde Hall Gardens Special Policy Area

Summary of Representations – main issues and suggested changes:

- For consistency with other parts of the plan, amend policy to refer to ‘active and sustainable means of travel’ (Essex County Council)
- RHS Hyde Hall causes significant traffic congestion at its special events, this will worsen as it expands but there is no provision to address this or improve the access road in application 21/01961/OUT.

#### SPA5 – Sandford Mill Special Policy Area

Summary of Representations – main issues and suggested changes:

- For consistency with other parts of the plan, amend policy to refer to ‘active and sustainable means of travel’ (Essex County Council)
- Fully support. This SPA needs to move forward as quickly as possible (Essex Waterways Ltd).

#### SPA6 – ARU Writtle Special Policy Area

Summary of Representations – main issues and suggested changes:

- Support. The facility is located within Writtle Key Service Settlement and is significant for educational excellence and driving the local economy. As such, the plan should provide new housing allocations near the ARU campus (Vistry Group)
- For consistency with other parts of the plan, amend policy to refer to ‘active and sustainable means of travel’ and ‘safe and convenient’ cycling and walking connectivity (Essex County Council)
- Expand to note the importance of ARU Writtle to supporting local employment to reduce inequality, opportunities to shift to a greener economy and investment into the rural economy (Essex County Council)
- Support the policy principles but the current designation will not ensure future development reflects the operational and functional requirements of ARU Writtle. The need for its growth and success is reflected throughout the plan. As such, amend policy to acknowledge that ARU intends to grow and expand to sustain its long-term future success and to delete the requirement to identify a ‘demonstrable need’ every time an application is determined (ARU)
- Expand the SPA boundaries of the Titchmarsh Campus and Rural Education and Training Centre along Cow Watering Lane to reflect the new and improved facilities/development that will be required (ARU)

- Inclusion of the Titchmarsh Campus does not affect any designated heritage assets (Historic England)
- Support sympathetic improvements to the ARU Writtle site in line with Green Belt policy. The Norwich to Tilbury powerline proposals will have a significant impact on ARU Writtle (Writtle Parish Council).

| <b>CCC response to the comments made</b>  |
|---|
| Changes proposed for SPA3 including deleting the requirement for water infrastructure and ancillary development to demonstrable very special circumstances have not been taken forward as this would contradict national planning policy. |
| Policy SPA2, SPA3, SPA4, SPA5 and SPA6 have been amended to include active and sustainable means of transport   |
| Policy SPA6 has been updated to include reference to National Cycle Route 1 which runs through the site.  |
| Policy and SPA boundaries has been amended to include the Titchmarsh Campus.  |
| Reference to 'demonstrable need' in SPA6 has not been removed as this was retained at the previous Local Plan examination.  |

### **Protecting and Securing Important Assets**

This section of the consultation document provides other non-strategic policies of the Local Plan that will shape Chelmsford's development opportunities whilst protecting its important physical attributes.

#### **Securing the right types of homes**

Key statistics:

| <b>Consultation point</b>  | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Policy DM1<br>– Size and Type of Housing                                   | 3          | 9         | 20              | 20                               |
| Policy DM2 – Affordable Housing and Exception Sites                        | 3          | 4         | 19              | 19                               |
| Policy DM3 – Policy DM3 – Gypsy, Traveller and Travelling Showpeople Sites | 2          | 0         | 3               | 3                                |

#### **Policy DM1 – Size and Type of Housing**

Summary of Representations – main issues and suggested changes:

- Support for the requirement for 100% of all new homes to be accessible and adaptable to enable people to live independently for longer (Mid and South Essex Integrated Care Board, Essex County Council, Dominus Chelmsford Limited)
- ECC has commissioned 'Supported and Specialist Housing and Accommodation Needs Assessment' which will inform the Specialist

Residential Accommodation requirements when complete (Essex County Council)

- Give more support and priority to build to rent (Wates Development and Hammonds Estates LLP, Dominus Chelmsford Limited)
- Self and custom build plots should be taken forward on standalone sites not part of strategic housing allocations (Bloor Homes – Eastern)
- The 5% requirement for self and custom build plots should be capped at 5% (Bloor Homes – Eastern)
- Self-build homes should be encouraged rather than required by evidence of local need (Whirlledge & Nott, Croudace)
- The impact of self-build homes on development viability should also be considered (Whirlledge & Nott, Croudace)
- The Specialist Residential Accommodation requirement is too generic and needs to specifically allocate land to meet older persons housing need identified in the SHNA (Bloor Homes – Eastern, Sedum Ltd)
- Provision of Specialist Residential Accommodation for older and disabled people is too low to meet the identified needs and does not provide enough certainty that these needs will be met in a planned way which supports the optimum arrangement of support services (Lewis and Scott Retirement Living)
- A dedicated specialist housing policy which allows development adjacent to defined settlement boundaries would be more effective (Lewis and Scott Retirement Living)
- The process for determining when a commuted sum in lieu of on-site provision of Specialist Residential Accommodation is acceptable, how the sums will be used and what part ECC plays in this should be clarified (Essex County Council)
- All new homes should be required to have solar panels built in (Sandon Parish Council)
- Disagree with the requirement for 100% of new dwellings to be accessible and adaptable based on the additional cost of achieving these standards (Chelmsford Garden Community Consortium, Vistry)
- The policy might become outdated as building regulations and market requirements evolve across the plan period (Higgins Group, Hill Residential Limited)
- Need to justify requiring 100% of all new homes to be accessible and adaptable as it is not currently a requirement and if it does become a requirement, it does not need to be included in policy (Home Builders Federation, Dandara, Bellway)
- The requirement for 100% accessible and adaptable homes should only apply to houses and ground floor flats (Chelmer Housing)
- Set a requirement that a percentage of market homes are wheelchair accessible (Mid and South Essex Integrated Care Board)
- Specify M4(3)b to ensure the wheelchair housing is provided with adaptations already in place on completion (Chelmer Housing)
- The Specialist Residential Accommodation and self-build requirements should not apply to 100% affordable housing or affordable-led development and sites should be allocated to meet these needs rather than a requirement on strategic sites (Chelmer Housing)

- The changes to Table 4 in terms of specifying a range, not a specific percentage mix, of housing is supported but flexibility should be increased to 10 percentiles and include a link to the most recent evidence base (Dandara)
- Include Table 4 in the policy to ensure it is adhered to (Dandara PO24-9372)
- Include additional policy text to enable a flexible approach to the mix in Table 4 (Higgins Group, Hill Residential Limited, Dominus Chelmsford Limited)
- Need a clearer distinction between greenfield strategic allocations and urban developments on the requirement for and provision of housing mix, Specialist Residential Accommodation and self-build homes (Dominus Chelmsford Limited)
- Flawed assumptions underpin the Council's viability assessment and the evidence for conclusions in para. 8.6 on the viability of Build to Rent schemes is unsound (Dominus Chelmsford Limited)
- Proposal for a different mix of affordable housing expressed as a percentage range that should apply to all affordable housing tenures (Chelmer Housing)
- Explain the policy thresholds in supporting text (Whirledge & Nott, Croudace)
- Include a co-living policy to avoid potential appeals or unregulated forms of co-living. Wording for a dedicated policy provided (Highgate Capital Limited)
- Include reference to the Nationally Designed Space Standards or greater (Chelmer Housing).

| <b>CCC response to the comments made</b>  |
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| Various policy amendments have been made including requiring 50% of new dwellings to be accessible and adaptable dwellings (Part A ii) and a new requirement for large greenfield sites to also provide older persons market housing. |
| How the sums will be used and what part Essex County Council will play in commuted sums in lieu of on-site provision of Specialist Residential Accommodation will be covered in Planning Obligations Supplementary Planning Document. |
| Requirements for the installation of solar panels on new homes is covered by Policy DM31.   |
| The Planning Obligations Supplementary Planning Document will promote wheelchair user dwellings on ground floor in flatted schemes where possible, but the policy target is acceptable.   |
| The Planning Obligations Supplementary Planning Document will encourage wheelchair accessible market homes in Specialist Residential Accommodation. This is supported by the updated Local Plan Viability Assessment, 2024.           |
| The Planning Obligations Supplementary Planning Document will clarify that 100% affordable housing led schemes will be exempt from providing self-build requirements. The policy remains appropriate.                                 |
| The policy thresholds are tested in the relevant evidence base documents and explained where not linked to an evidence base document.   |
| The policy requirements reflect the most up to date national planning and guidance and the Local Plan evidence base including the latest Strategic Housing Needs Assessment (SHNA) (2023), including the 2024 addendum report.        |
| The impact of self-build homes on development viability is considered in the updated Local Plan Viability Update, 2024.   |

The Local Plan Viability Update 2023 and 2024 has been undertaken in accordance with national policy and guidance and clearly sets out the balance of policy priorities.

The Council's expectations for co-living housing proposals will be set out in the Co-Living Housing Planning Advice Note which will be published for consultation in early 2025.

Requirements for all new dwellings to adhere to the Nationally Described Space Standards is addressed in Policy DM26.

The Local Plan will be reviewed every five years. This will address relevant changes such as changes to Building Regulations. Higher accessibility standards have been tested in the Local Plan Viability Update 2024 should Building Regulations change in the regard.

## DM2 - Affordable Housing and Exception Sites

Summary of Representations – main issues and suggested changes:

- Support policy as drafted (Wates Developments and Hammonds Estates LLP)
- Support but amend to allow for the submission of a Viability Appraisal at application stage should there be any unique circumstances or changes to local market conditions (Bloor Homes (Eastern))
- Support but add to A) i that this is subject to viability to not undermine deliverability (Vistry Group)
- Support but unclear why community-led exception sites cannot include neighbourhood plan allocations (Broomfield Parish Council)
- Clarification sought on whether Broomfield is eligible for a Rural Exception Site following the Community Governance Review (Broomfield Parish Council)
- To not impact on the delivery of affordable homes, amend policy to state that First Homes will not be required on 100% affordable, affordable-led and rural exception site developments (Chelmer Housing Partnership (CHP))
- For clarification, add to para. 8.23 the requirements in terms of wider types of affordable (Chelmer Housing Partnership (CHP))
- To not jeopardise site viability, policy must recognise that a tenure mix in 2024 (at para. 8.23) will unlikely reflect the needs in subsequent years (Obsidian Strategic Asset Management Ltd)
- Policy should only allow 35% market homes to increase the number of genuinely affordable home supported by a return to council house building, suspension of the Right to Buy for 10 years and increased role for co-operative developers
- Policy should recognise that First Homes is not mandatory and no more than a material consideration (Obsidian Strategic Asset Management Ltd)
- Part ii is inconsistent with national policy and should be amended to expect the mix, size, type and cost of housing to have close regard to the most recent evidence on housing needs, such as the Strategic Housing Market Assessment and monitoring data (Home Builders Federation)
- Should be flexibility in the mix set out in para 8.23 especially on percentage discount on First Homes because of the national cap at £250,000 (Home Builders Federation)

- For clarification, amend policy to add where sites deliver 100% affordable schemes the revised mix should be 70% Affordable Rent, and 30% Shared Ownership and that the Local Housing Allowance cap should be removed on affordable rent where the site is delivered as 100% affordable or affordable-led development (Chelmer Housing Partnership (CHP))
- Table 5 should apply across all affordable tenures. Request that the affordable housing unit mix (including rent and shared ownership) is 1 Bed 5-10% 2 Bed 20-25% 3 Bed 40-50% 4 Bed 15-20% (Chelmer Housing Partnership (CHP))
- Clarify detail in Table 5 and that it is only to be used as a guide as opposed to absolute requirements in decision-making (Hill Residential Ltd, Higgins Group, Dandara)
- To ensure adherence with Table 5, add into the policy alongside a reference to using the most recent housing needs assessment (Dandara)
- A one-sized fits all 35% requirement discourages a brownfield first approach (Dominus Chelmsford Limited)
- Include reference to the national policy of Vacant Building Credit (Dominus Chelmsford Limited)
- To help the NHS recruit and retain staff, consider the need for affordable housing for NHS staff and those employed by other health and care providers in housing needs assessments, site selection and allocation policies (NHS Property Services Ltd)
- Amend to allow groups of affordable housing within large strategic allocations/development phases (rather than ‘pepper potting’) as this would achieve the policy’s social objectives (Whirlledge & Nott, Croudace Homes)
- Do not support. Amend policy to enable a viability case to be made at the planning application stage (Croudace Homes, Whirlledge & Nott)
- Do not support. Amend policy to allow a transparent open book viability assessment to be undertaken and for development to come forward with an alternative approach to affordable housing delivery should site-specific viability matters arise at the planning application stage (Martin Grant Homes)
- Do not support. The Viability study should be re-run for sheltered and extra care housing incorporating our revised assumptions relating to for example, unit size, unit mix and non-chargeable/communal. This is likely to show that sheltered and extra care housing is unviable (McCarthy Stone)
- Consider the Retirement Housing Consortium paper ‘A briefing note on viability’ prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2016 (‘RHG Briefing Note’)) (McCarthy Stone)
- An unprecedented housing crisis is currently affecting the Council, therefore a new policy DM2 Part C is proposed, which would supersede DM2 Parts A and B and come into force when more than 250 households are living in temporary accommodation, and it has been accepted by the Council that there is a duty to house them (Omtech Services Limited).

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| <b>CCC response to the comments made</b>  |
| The policy requirements including those related to First Homes have been updated to reflect the Strategic Housing Needs Assessment (SHNA) 2024 addendum report. |
| Amendments added from the Planning Obligations Supplementary Planning Document to clarify how affordable housing should be designed within                      |

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| developments to maximise tenure integration to achieve mixed, inclusive and sustainable communities  |
| The policy requirements are supported by the Local Plan Viability Assessment, 2024.  |
| Para. 73 of NPPF states that exception site for community-led housing should be on land which is not already allocated for housing – no change required to Policy DM1.   |
| The rural exception site part of the policy relates to retention orders imposed by Statutory Instruments referenced in Planning Obligations Supplementary Planning Document.   |
| Exemptions to First Homes requirements are set out in para. 66 of NPPF – no change required to Policy DM2.   |
| The Local Plan will be reviewed every five years to reflect the most up to date national planning and guidance and any updated Local Plan evidence base.   |
| Prioritisation mechanisms for First Homes will be set out in the updated Planning Obligations Supplementary Planning Document.   |
| The 35% affordable housing requirement will help to address Chelmsford's housing crisis declared by the Council in 2022. Levels of homelessness also continue to rise and increasing the percentage of affordable housing on greenfield sites would be unviable. It is not necessary to introduce an additional threshold based on the numbers of households living in temporary accommodation but the proposed Housing Requirement is being increase, which in turn will increase affordable housing delivery across the plan period. |
| Changes have been made to explain the circumstances where the Council will consider a viability assessment at planning application stage.  |
| Changes have been made to explain what the requirements for Affordable Private Rent dwellings in Build to Rent Schemes will be and the reasons for this.   |

### Policy DM3 – Gypsy, Traveller and Travelling Showpeople Sites

Summary of Representations – main issues and suggested changes:

- Support (Wates Developments and Hammonds Estates LLP, Writtle Parish Council)
- Add 'Green Wedge' in (A)i to align with para. 8.42 (Broomfield Parish Council).

#### **CCC response to the comments made**

The policy requires new sites to be outside the Green Belt unless very special circumstances apply, in line with national planning policy. New text has been inserted to clarify that new sites shouldn't be in the Green Wedge unless it can be demonstrated that a development would not adversely impact on the role, function, character and appearance of the Green Wedge. Clarification has also been provided on new sites in the rural area not having a significant impact the intrinsic character and beauty of the countryside in the supporting / explanatory text.

### Securing Economic Growth

Key statistics:



| <b>Consultation point</b>                                | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Policy DM4 – Employment Areas and Rural Employment Areas | 7          | 0         | 8               | 8                                |
| Policy DM5 – Designated Centres                          | 2          | 0         | 3               | 3                                |

#### Policy DM4 – Employment Areas and Rural Employment Areas

Summary of Representations – main issues and suggested changes:

- Support for the policy (CNG Fuels Ltd, JH Farming Ltd, Pigeon Sandon Ltd, Wates Developments and Hammonds Estates LLP, Essex County Council)
- Expand policy criteria for allow redevelopment or changes of use from E(g), B2 and B8 Use Classes to uses which provide low carbon/renewable energy transport refuelling infrastructure” (CNG Fuels Ltd)
- Add additional text into para. 3 of the policy for proposals to consider opportunities to promote multifunctional green infrastructure (Essex County Council)
- Support for the approach but new allocations may not, per se, lead to overall economic growth if they lead to older premises becoming less attractive and lost through change of use (Basildon Borough Council)
- Consider amending to strengthen the policy for example, make it clearer that the redevelopment of existing employment areas should be for employment uses only and planning permission would only be granted for a change of use from employment where the first four criteria apply, and/or there is no reasonable prospect for the site to continue in those uses (Basildon Borough Council).

#### **CCC response to the comments made**

Policy adjusted to refer to multifunctional green infrastructure.

The criteria relating to redevelopment of existing uses offers flexibility and a positive approach as set out in the NPPF. Policy S2 supports development that provides opportunities for renewable and low carbon energy technologies and schemes so no changes are considered necessary to S8.

Policy already sets out the circumstances where redevelopment or change of use from E(g), B2 and B8 Use Classes will be granted.

#### Policy DM5 – Designated Centres

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP, Dominus)
- Car parking at South Woodham Ferrers must be protected if the town centre is to flourish.

#### **CCC response to the comments made**

There are no proposals affecting car parking in SWF in the plan.

## Protecting the Countryside

Key statistics:

| <b>Consultation point</b>  | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Policy DM6 – New Development in the Green Belt   | 2          | 0         | 6               | 6                                |
| Policy DM7 – New Buildings and Structures in the Green Wedge                                     | 7          | 1         | 14              | 14                               |
| Policy DM8 – New Buildings and Structures in the Rural Area                                      | 2          | 2         | 4               | 4                                |
| Policy DM9 – Infilling in the Green Belt, Green Wedge and Rural Area                             | 1          | 0         | 4               | 4                                |
| Policy DM10 – Change of Use (Land and Buildings) and Engineering Operations                      | 1          | 0         | 4               | 4                                |
| Policy DM11 – Extensions to Existing Buildings within the Green Belt, Green Wedge and Rural Area | 1          | 0         | 4               | 4                                |
| Policy DM12 – Rural and Agricultural/Forestry Workers' Dwellings                                 | 1          | 0         | 3               | 3                                |

### Policy DM6 – New Development in the Green Belt

Summary of Representations – main issues and suggested changes:

- Support expressed (Chelmsford & Central Essex RSPB Local Group, and Wates Developments and Hammonds Estates LLP)
- Alter Green Wedge boundary and extend the western boundary of Widford Employment Area (Map 3) to support growth in this sustainable location, with existing transport and pedestrian links (Saxtons 4x4)
- Policy contradicts the strategy of resisting development in the Green Belt and contradicts the Settlement Hierarchy which confirms that settlements within the Green Belt are sustainable (Hill Residential Ltd and Higgins Group)
- Policy lacks clarity and fails to link to the strategic policies (Hill Residential Ltd and Higgins Group).

#### **CCC response to the comments made**

The Green Wedge is a locally important designation. Changes to the Green Wedge boundaries to allow development growth has been discounted as there is sufficient and suitable land elsewhere to meet development needs in a sustainable way.

The policy seeks to protect the Green Belt in accordance with National Planning Policy. The Settlement Hierarchy informs planning decisions in relation to the most sustainable settlements but does not override National Policy regarding Green Belt – no changes considered necessary.

Policy DM7 – New Buildings and Structures in the Green Wedge

Summary of Representations – main issues and suggested changes:

- Support expressed (Chelmsford & Central Essex RSPB Local Group, and Wates Developments and Hammonds Estates LLP, Broomfield Parish Council)
- An alteration to the Green Wedge boundary should be considered and an extension to Widford Employment Area (Map 3) allowed (Saxtons 4x4)
- For consistency with other parts of the plan refer to ‘active and sustainable travel’ in criteria v (Essex County Council)
- In terms of C) replacement buildings within a floodplain, there is opportunity to seek betterment and long-term sustainability even if the flood hazard affecting existing development may not increase, this should be clarified in the policy (Environment Agency)
- Policy is overly restrictive without a detailed assessment to ensure land within the Green Wedge performs its intended purposes
- Be more flexible to residential development, particularly where it would provide opportunities to enhance the Green Wedge
- Supports the intentions behind the principle of the Green Wedge but questions the approach to the Green Wedge, when other less onerous planning policies can protect open countryside if the housing strategy is performing as it should (Obsidian Strategic Asset Management Ltd)
- Various comments from landowners/developers promoting their sites for development in the Green Wedge
- Expand policy to include small-scale commercial development that is sustainably located, accessible and well connected (Cliffords Group Ltd and Hill Farm (Chelmsford) Ltd).

**CCC response to the comments made**

For consistency with other parts of the Plan reference is made to ‘active and sustainable travel’ in Part A, criteria v.

The Green Wedge is a locally important designation. Changes to the Green Wedge boundaries to allow development growth has been discounted as there is sufficient and suitable land elsewhere to meet development needs in a sustainable way. No Green Wedge Review is required, and the deletion of Green Wedge policies would be inappropriate.

The Plan and its policies should be read as a whole. Flooding is covered by DM18 which requires measures to mitigate flood risk, safe means of escape, not increase flood risk elsewhere etc. Such issues will be addressed through site-specific Flood Risk Assessments – no changes considered necessary.

Policy will ensure that the Green Wedge is sufficiently protected and Part A, criteria vi allows for appropriate facilities e.g. for sport – no changes considered necessary.

The Council has considered the suitability of alternative development strategies and sites to accommodate development as part of the plan preparation process. Some areas/sites proposed for development by developers/landowners have been rejected as part of this process.

#### Policy DM8 – New Buildings and Structures in the Rural Area

Summary of Representations – main issues and suggested changes:

- Support expressed (Chelmsford & Central Essex RSPB Local Group, and Wates Developments and Hammonds Estates LLP)
- Part B should be more flexible (Mr Parker)
- Address inconsistencies regarding allowing new Buildings/Dwellings on Previously Developed Land (Mr Parker)
- Amend to refer to renewable energy and low carbon development, related transport infrastructure and specific locational requirements of different sectors to support the rural economy (CNG Fuels).

#### **CCC response to the comments made**

Requirements for renewable energy and low carbon development and transport infrastructure are adequately covered by Policies S2 and DM19. No changes considered necessary.

The policy is considered clear in how development on previously developed land will be considered. No changes considered necessary.

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

Summary of Representations – main issues and suggested changes:

- Support expressed (Wates Developments and Hammonds Estates LLP)
- Policy needs to mention flood risk constraints (Environment Agency)
- Overly restrictive to development in the Green Wedge
- Unclear how a decision-maker will determine if a gap is 'small' and is contrary to the NPPF.

#### **CCC response to the comments made**

The Plan and its policies should be read as a whole. Flooding is already covered by DM18 which requires measures to mitigate flood risk, safe means of escape, not increase flood risk elsewhere etc. Such issues will be addressed through site-specific Flood Risk Assessments. No changes considered necessary.

The Reasoned Justification sets out how to determine a 'small' gap. No changes considered necessary.

#### Policy DM10 – Change of Use (Land and Buildings) and Engineering Operations

Summary of Representations – main issues and suggested changes:

- Support expressed (Wates Developments and Hammonds Estates LLP)
- Policy needs to mention flood risk constraints (Environment Agency)

- Refer to Policy S8 of the Essex Minerals Local Plan and emphasise the importance of effective early engagement with relevant site promoters (Essex County Council).

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| <b>CCC response to the comments made</b> |
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| The Plan and its policies should be read as a whole. Flooding is already covered by DM18 which requires measures to mitigate flood risk, safe means of escape, not increase flood risk elsewhere etc. Such issues will be addressed through site-specific Flood Risk Assessments. No changes considered necessary. |
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| Planning applications where consultation with the Minerals Planning Authority is required are already picked up at any relevant pre-application processes or the 'vetting' stage of a planning application. No changes considered necessary. |
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Policy DM11 – Extensions to Existing Buildings within the Green Belt, Green Wedge and Rural Area

Summary of Representations – main issues and suggested changes:

- Support expressed (Wates Developments and Hammonds Estates LLP)
- Policy needs to mention flood risk constraints (Environment Agency)
- Refer to Policy S8 of the Essex Minerals Local Plan and emphasise the importance of effective early engagement with relevant site promoters (Essex County Council).

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| <b>CCC response to the comments made</b> |
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| The Plan and its policies should be read as a whole. Flooding is already covered by DM18 which requires measures to mitigate flood risk, safe means of escape, not increase flood risk elsewhere etc. Such issues will be addressed through site-specific Flood Risk Assessments. No changes considered necessary. |
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| Planning applications where consultation with the Minerals Planning Authority is required are already picked up at any relevant pre-application processes or the 'vetting' stage of a planning application. No changes considered necessary. |
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Policy DM12 – Rural and Agricultural/Forestry Workers' Dwellings

Summary of Representations – main issues and suggested changes:

- Support expressed (Wates Developments and Hammonds Estates LLP)
- Policy needs to mention flood risk constraints (Environment Agency)
- Refer to Policy S8 of the Essex Minerals Local Plan and emphasise the importance of effective early engagement with relevant site promoters (Essex County Council).

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| <b>CCC response to the comments made</b> |
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| The Plan and its policies should be read as a whole. Flooding is already covered by DM18 which requires measures to mitigate flood risk, safe means of escape, not increase flood risk elsewhere etc. Such issues will be addressed through site-specific Flood Risk Assessments. No changes considered necessary. |
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Planning applications where consultation with the Minerals Planning Authority is required are already picked up at any relevant pre-application processes or the 'vetting' stage of a planning application. No changes considered necessary.

### Protecting the Historic Environment

Key statistics:

| Consultation point                           | Yes | No | Comments | Total number of responses |
|--|-----|----|----------|---------------------------|
| Policy DM13 – Designated Heritage Assets     | 3   | 0  | 3        | 3                         |
| Policy DM14 – Non-Designated Heritage Assets | 2   | 0  | 2        | 2                         |
| Policy DM15 - Archaeology                    | 0   | 1  | 2        | 2                         |

### Policy DM13 – Designated Heritage Assets

Summary of Representations – main issues and suggested changes:

- Support expressed (C J H Farming Ltd, Pigeon (Sandon) Ltd, Historic England).

#### **CCC response to the comments made**

No changes.

### Policy DM14 – Non-Designated Heritage Assets

Summary of Representations – main issues and suggested changes:

- Support expressed (Historic England, Writtle Parish Council).

#### **CCC response to the comments made**

The policy has been updated to provide clarity in the considerations of identifying non-designated heritage assets in planning decisions.

### Policy DM15 – Archaeology

Summary of Representations – main issues and suggested changes:

- Support expressed (Historic England)
- To reflect para. 8.128 and national policy, re-word the policy to recognise instances where the level of significance of the remains do not warrant protection, preservation or enhancement, and their loss could be justified. New policy text is proposed (Wates Developments and Hammonds Estates LLP).

#### **CCC response to the comments made**

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| Planning legislation and case law are based on preservation; therefore it is inappropriate to amend the wording.  |
| Additional wording has been added to the policy and Reasoned Justification following the archaeological evidence base to clarify archaeological significance. |

## Protecting the Natural Environment

Key statistics:

| <b>Consultation point</b>  | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Policy DM16 – Protection and Promotion of Ecology, Nature and Biodiversity | 16         | 6         | 32              | 32                               |
| Policy DM17 – Trees, Woodland and Landscape Features                       | 5          | 5         | 14              | 14                               |
| Policy DM18 – Flooding/SUDS  | 4          | 1         | 12              | 12                               |
| Policy DM19 – Renewable and Low Carbon Energy                              | 2          | 1         | 6               | 6                                |

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

Summary of Representations – main issues and suggested changes:

- Support policy (Wates Developments and Hammonds Estates LLP, Dominus Chelmsford Limited, Natural England, (Pigeon (Sandon) Ltd, Chelmsford and Central Essex RSPB, Anglian Water)
- Local Plan should set criteria based policies to ensure the protection of designated biodiversity and geological sites. Such policies should clearly distinguish between international, national and local sites (Natural England)
- Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protection Areas) and Ramsar sites should be included on the Policies Map (Natural England)
- Reference to swift boxes and bricks is welcome but there is no indication which is preferable – policy change suggested to require swift bricks in accordance with best practice (Swifts Local Network: Swifts & Planning Group)
- Minor policy changes suggested relating to green infrastructure and reference to Essex Green Infrastructure Standards 2022 (Essex County Council)
- Would like to see a distinction between public green spaces and habitats for wildlife as it is not explicitly clarified (Environment Agency)
- Specify that native species should always be used for biodiversity landscaping/planting (Environment Agency)
- Plan makes no explicit preference to retaining riparian corridors as public open space over private gardens (Environment Agency)

- Add a link to the Essex LNRS in the policy (Anglian Water)
- Oppose the 20% BNG requirement on Garden Community sites as it exceeds national requirements (Bellway Homes, Bellway Strategic Land, Chelmsford Garden Community Consortium)
- No assessment of the cumulative impact of the 20% BNG requirement and the tree planting requirement (3 trees per dwelling) (Bellway Homes, Bellway Strategic Land)
- 20% BNG would undermine viability and significantly reduce the capacity of development sites which will impact the Council's growth requirements (Bellway Homes, Bellway Strategic Land)
- The viability impacts of the costs related to BNG habitat management and BNG credits has not been appropriately assessed. The Biodiversity Net Gain and Local Nature Recovery Strategies – Impact Assessment (BNG IA) is based on broad costs, not specific development sites and does not have up-to-date or realistic estimate costs (Dandara Eastern, Home Builders Federation)
- BNG IA makes no consideration to a potential reduction in the developable area to accommodate BNG provision – this assumption should be tested (Home Builders Federation)
- BNG IA underestimates the cost of delivery BNG off-site (Bellway Homes, Home Builders Federation)
- For typology testing, undertake sensitivity testing to understand the impacts of delivering BNG off-site (Home Builders Federation)
- Amend policy to clarify that developers would not be required to meet standards beyond national and local policy (Home Builders Federation)
- Concerns on the deliverability of providing 20% minimum on large sites, which are usually greenfield, as they usually have a relatively high BNG baseline value (Whirlledge & Nott, Croudace Homes)
- The 20% biodiversity net gain requirement on large sites has not been justified in evidence base as being financially viable or practically deliverable/viable (Whirlledge & Nott, Croudace Homes)
- The viability of delivery 20% BNG need to be tested locally and on current market prices (Chelmsford Garden Community Consortium, Vistry Group)
- 20% BNG should be expressed as a target/aspiration rather than a requirement (Whirlledge & Nott, Croudace Homes, Chelmsford Garden Community Consortium, Vistry Group)
- No evidence demonstrating the implications of what a 20% (BNG) uplift would require and whether the proposed allocations can achieve this in comparison to omitted sites that have a stronger BNG potential (Obsidian Strategic Asset Management Ltd)
- More sites will be needed to deliver the Local Plan housing requirement as 20% BNG will reduce developable areas resulting in lower yield of dwellings on sites. Further work is needed with site promoters to identify sites (Obsidian Strategic Asset Management Ltd)
- Policy repeats the BNG requirements of Strategic Policy S4 and national policy – the policy should avoid unnecessary repetition/it is an unnecessary



duplication and remove references to the amount of BNG requirement (Dandara Eastern, Hill Residential Ltd, Higgins Homes)

- The requirement for Garden Communities to deliver 20% BNG should be clarified in terms of when it is delivered, i.e. per phase or on completion (Chelmsford Garden Community Consortium, Vistry Group)
- For Garden Communities the policy should require 10% BNG per phase with an aspiration of 20% overall net gain (Chelmsford Garden Community Consortium, Vistry Group)
- Policy should be flexible to take account of; site specific circumstances which may require off-site provision, the viability considerations of off-site vs. on-site and circumstances where off-site provision outside of the administrative may deliver substantial benefits (Chelmsford Garden Community Consortium, Vistry Group).

| <b>CCC response to the comments made</b>   |
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| Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protection Areas) and Ramsar sites are shown on the Draft Policies Map.  |
| Reasoned Justification has been amended to clarify the relationship between public open space and SANGS, and biodiversity net gain provision.  |
| Reasoned Justification has been amended to include the use of native species for landscaping.  |
| Reasoned Justification has been amended to include opportunities to retain riparian corridors as public open space.  |
| Reasoned Justification has been amended to confirm that public open space requirements or the provision of SANGs are separate to biodiversity net gain and will not be considered as an alternative to or a replacement for net gain provisions, and that where possible, the provision of both on site should be segregated to ensure the quality of the habitat for wildlife is maximised. |
| The LNRS is at draft stage, and it is not considered appropriate to link to its specific priorities until they have been adopted.  |
| Reasoned Justification has been expanded to clarify that major developments will be required to provide on-site measures in addition to paying the RAMS tariff to help mitigate increased recreational impacts on international coastal designated sites.  |
| The policy requirements have been tested through the Local Plan Viability assessments.   |
| Reasoned Justification has been amended to clarify where off-site provision will be considered.  |
| The policy includes the BNG targets of 10% and 20% for clarity and completeness.   |
| A range of biodiversity features that can be considered is included in the Reasoned Justification and in the Council's making Places SPD. Inclusion of a specific policy requirement to provide swift bricks is not supported. The use of swift boxes and/or bricks will depend on site-by-site circumstances and specifying a preference would be inappropriate.                            |
| Policy has been amended to note that the achievement of 20% biodiversity net gain on sites 6 and 16a will be subject to site constraints.  |

## Policy DM17 – Trees, Woodland and Landscape Features

### Summary of Representations – main issues and suggested changes:

- Support expressed (Chelmsford & Central Essex RSPB Local Group, Swifts Local Network: Swifts & Planning Group, Dandara, Pigeon (Sandon) Ltd)
- Consider adding to reasoned justification the contribution to the Big Green Internet Project that aims to connect woodlands from Tendring via Chelmsford to Epping Forest (Essex County Council)
- Add a reference to Ancient Woodlands and how they are irreplaceable habitats. As such, the policy requirement for replacement of trees of a “size and type suitable for location” may not be entirely appropriate (Forestry Commission)
- New development should consider any impacts on ancient woodland and ancient and veteran trees in line with the NPPF. Support for the Forestry Commissions conclusions (Natural England)
- Clarify the term ‘preserved trees’ and expand policy to include the strict protection of irreplaceable habitats (including ancient or veteran trees and ancient woodlands) as afforded by the NPPF (Wates Development and Hammonds Estates LLP)
- Amend policy to ensure existing nest sites for building-dependent species such as swifts and house martins are protected. Alternatively, mitigation should be provided (Swifts Local Network: Swifts & Planning Group)
- Part C – New Trees is supported but additional wording sought for Part C to ensure new tree planting is adequate (Wates Development and Hammonds Estates LLP)
- The requirements of Part C of three new trees per dwelling is questioned by a number of developers as:
  - Prioritising trees in the landscaping and layout may impact negatively on the design of a scheme (Dandara)
  - Quality of trees, specimen type and location best dictate tree coverage rather than a stringent quantum. For the Meadows, this would lead to over 2,400 trees which cannot be realistically accommodated (Dominus Chelmsford Ltd)
  - It may impact on viability and should be fully evidenced and considered along with the requirements for BNG (Obsidian Strategic Asset Management Ltd, Richborough, McCarthy and Stones)
- To avoid ambiguity, clarify ‘significant’ with regards the number of trees to be delivered on strategic employment sites (Pigeon (Sandon) Ltd, CNG Fuels).

| <b>CCC response to the comments made</b>  |
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| The Reasoned Justification for DM16 has been amended to clarify irreplaceable habitats such as ancient woodland and ancient or veteran trees. |
| Policy covers ancient woodlands and aged and veteran trees found outside ancient woodlands.   |

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| Reasoned Justification has been amended to include the use of native species for landscaping.  |
| Reasoned Justification has been to include opportunities to retain riparian corridors as public open space.  |
| Protection for nesting birds is covered by separate legislation. However, the Reasoned Justification states that the presence of protected species is a material consideration when the Council is considering a development proposal which, if carried out, would be likely to result in harm to the species or its habitat – no further change considered necessary. |
| Reasoned Justification already states that trees for on-site planting will be determined by the size, position, and type of location available.  |
| Reasoned Justification already states that a judgement will be made on a case by case basis over what will be considered 'significant' taking into account the nature, scale and size of the development, the site and immediate locality with more guidance to be set out in the Making Places SPD.   |
| Reasoned Justification has been amended to clarify that a significant number of new trees on major new employment and infrastructure sites must be provided as part of landscaping requirements.   |
| The policy requirements have been tested through the Local Plan Viability assessments.   |

### Policy DM18 – Flooding/SUDS

Summary of Representations – main issues and suggested changes:

- Support expressed (Chelmsford & Central Essex RSPB Local Group, Wates Developments and Hammonds Estates LLP, Dominus Chelmsford Limited)
- Policy should not prohibit appropriate land uses such as open space or attenuation measures being in flood zones (Pigeon (Sandon) Ltd)
- Add 'unless it is demonstrated to be unviable' in relation to use of SuDS under Part C to ensure development viability is not undermined (CNG Fuels Ltd)
- Support the use of SuDS schemes where appropriate to support aquifer recharge and reduce flooding. However, use of infiltration SuDS is not appropriate on all sites. Recommend guidance be referenced: The Environment Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13; The CIRIA C753 SUDS Manual; The Susdrain website; The Sustainable Drainage Systems: Non-Statutory Technical Standards guidance on gov.uk and the Recommendations To Update (Environment Agency)
- Support the inclusion of SuDS into sites that may come forward for redevelopment and regeneration where such features would also be beneficial for the management of surface water flooding and environmental enhancement (Environment Agency)
- The policy should include: 'B) provide a safe dry refuge above the 0.1% (1 in 1000) AEP with allowance for climate change' and 'safeguarding land from development that is required, or likely to be required, for current or future flood management' (Environment Agency)

- Amend part B) ii) to clarify that brownfield sites will be treated as greenfield with discharge rates limited to the equivalent 1 in 1 year greenfield rate unless this is demonstrated as not practical (Anglian Water Services Ltd)
- Agree that opportunities for providing betterment should be explored on strategic and regeneration sites, and through retrofitting SuDS within existing urban areas at risk of surface water flooding (Anglian Water Services Ltd)
- Add reference to integrated water management measures such as rainwater/stormwater harvesting and reuse, to minimise potable water demands through utilising non-potable water for irrigation, and flushing toilets in residential properties (Anglian Water Services Ltd)
- Final paragraph of the policy is inadequate to address surface water connections to the public sewer network and amended wording suggested to reflect discharge of surface water following the sustainable drainage hierarchy (Anglian Water Services Ltd)
- Policy needs to have flexibility in approach and allow different techniques to address site specific characteristics. Integrate reference to the Lead Local Flood Authority into the policy (Higgins Group, Hill Residential Ltd)
- Amend section C to provide more consideration to the use of Green Infrastructure SuDS together to maximise benefits through multifunctionality (Essex County Council)
- Comment from landowners/developer suggesting that their proposed development site will accord with the preferred plan (Dandara).

| <b>CCC response to the comments made</b>   |
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| The policy does not prevent development on sites at risk of flooding where they comply with the requirements of the policy and national planning policy and guidance.  |
| In line with the NPPG, all new development is required to incorporate water management measures to reduce surface water run-off by using for example SuDS. The Pre-Submission plan is supported by an updated Viability Report (2024).   |
| The policy supports using SuDS but is also flexible by allowing solutions for the disposal of surface water.   |
| Various site policy changes have been made including new requirements to provide a safe dry refuge, to manage surface water run-off so that the discharge rate will not exceed the equivalent 1 in 1 greenfield rate, for rainwater / stormwater harvesting, to the sustainable drainage hierarchy, to include reference to the utilisation of Green Infrastructure, and to clarify surface water connections to the foul sewer. |
| A new sentence has been added to the Reasoned Justification of Strategic Policy S2 to for developments to accord with latest technical guidance, or as updated and amended, including The Environment Agency's Approach to Groundwater Protection; The CIRIA C753 SUDS Manual; and Sustainable Drainage Systems: Non-Statutory Technical Standards – adding to DM18 would be duplication.  |
| Policy already results in an improvement on a current situation. The Council requires site specific FRAs to provide surface water flows that mimic the greenfield runoff rate which is an improvement on the present situation as it will require water to be held on site for longer and perhaps permanently. This has  |

been a long-standing technical requirement which can already be found in ECC's Sustainable Drainage Design Guide and the EDG – no further changes considered necessary.

Policy DM25 addresses measures to reduce non-potable water consumption, and the use of recovered water for tasks such as flushing toilets. No change required to DM18.

Amendments have been made to Policies S2, DM24 and DM25 to require to the use of integrated water management techniques. No change to DM18 as this is specific to flooding and the measures to address this.

No change in relation to safeguarding land from development that is required, or likely to be required, for current or future flood management. At this stage, we do not have a list of sites where we can identify land to be safeguarded for flood risk management interventions.

The policy supports open space and attenuation measures in flood zones.

### Policy DM19 – Renewable and Low Carbon Energy

Summary of Representations – main issues and suggested changes:

- Support expressed (Chelmsford & Central Essex RSPB Local Group, Wates Developments and Hammonds Estates LLP, CNG Fuels)
- Policy should encourage biodiversity, not just impact on it, for example by the establishment of hedgerows and buffer strips (Chelmsford & Central Essex RSPB Local Group, Essex County Council)
- Para 8.163 should refer to the EDG – Solar Farm Guiding Principles (Essex County Council)
- Make the policy and supporting paragraphs more explicit at acknowledging evolving technological carbon reduction advances such as BIO-CNG fuel for the transport sector (CNG Fuels).

#### **CCC response to the comments made**

The promotion of biodiversity is addressed in the Solar Farm SPD.

The policy scope is considered appropriate and compliant with national policy.

### Delivering and protecting Community Facilities

Key statistics:

| <b>Consultation point</b>              | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| DM20 – Delivering Community Facilities | 3          | 1         | 6               | 6                                |
| DM21- Protecting Community Facilities  | 3          | 2         | 5               | 5                                |
| DM22 – Education Establishments        | 1          | 1         | 2               | 2                                |

### DM20 – Delivering Community Facilities

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP, Dandara, Sport England)
- There should be sufficient provision of cemetery space (Environment Agency)
- Refer in policy to vehicle parking being standards in accordance with Policy DM27 (Essex County Council)
- The policy of protecting the Green Belt is leading to other social and economic issues within some Green Belt settlements such as a decline in community infrastructure (Barratt David Wilson (Eastern Counties)).

| <b>CCC response to the comments made</b>  |
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| It is not considered necessary to cross reference to Policy DM27 – this would also add duplication to the plan.   |
| Development growth in the Green Belt has been discounted as there is sufficient and suitable land is available outside the Green Belt to meet the development needs in a sustainable way. It would also undermine national planning policy. |

### DM21 – Protecting Community Facilities

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP, Sport England)
- Support the need for applicants to provide evidence for the change of use of a public house, particularly focusing on the pub's economic viability and importance to the local community (Chelmsford & Mid Essex CAMRA)
- Support policy premise amend to make it more effective and robust in relation to the use of the term 'economically viable' as viability can be manipulated through intentionally undermining performance. A facility could be successful under an alternative operating model such as community ownership (Theatres Trust)
- Support for the provision of sufficient, quality community facilities but the policy is not flexible enough. The disposal of no longer suitable or redundant healthcare sites and properties helps to fund new or improved services. Having to meet criterion (ii) adds unjustified delay to vital reinvestment in facilities and services for the community (NHS Property Services Ltd)
- The Spatial Principles do not consider the need for sustainable new housing in Green Belt settlements to sustain their vitality and support existing community infrastructure and services (Barratt David Wilson (Eastern Counties)).

| <b>CCC response to the comments made</b>  |
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| It is not reasonable to remove requirement Aii), proposals would still need to demonstrate these tests. |
| It is not necessary to add additional wording in relation to an alternative operating model.            |

### DM22 – Education Establishments

## Summary of Representations – Main Issues:

- Support as drafted (Wates Developments and Hammonds Estates LLP)
- Support principle of policy but delete requirement for expansion proposals to be considered against an approved masterplan as education priorities date quickly requiring frequent costly masterplan updates. Instead assess development proposals against prevailing plan policies (ARU).

### **CCC response to the comments made**

Proposals for expansions would still be required to be considered against a masterplan (particularly for ARU) as it is located within a SPA where development would otherwise be constrained – no change.

## **Making High Quality Places**

This section of the consultation document provides the basis for the promotion of Chelmsford as a high-quality place to live, work, visit and study in.

### Section 9 - Making Places

Key statistics:

| <b>Consultation point</b>   | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---|------------|-----------|-----------------|----------------------------------|
| Policy DM23 – High Quality and Inclusive Design                         | 4          | 1         | 10              | 10                               |
| Policy DM24 – Design and Place Shaping Principles in Major Developments | 6          | 1         | 9               | 9                                |
| Policy DM25 – Sustainable Buildings                                     | 9          | 2         | 19              | 19                               |
| Policy DM31 – Net Zero Carbon Development (In Operation)                | 8          | 7         | 29              | 29                               |
| Policy DM26 – Design Specification for Dwellings                        | 3          | 0         | 3               | 3                                |
| Policy DM27 – Parking Standards   | 1          | 0         | 1               | 1                                |
| Policy DM28 – Tall Buildings  | 2          | 0         | 4               | 4                                |

### Policy DM23 – High Quality and Inclusive Design

Summary of Representations – main issues and suggested changes:

- Overall support (Wates Developments and Hammonds Estates LLP, Hill Residential Ltd, Dominus Chelmsford Limited)
- Policies DM23 and DM24 appear to overlap especially in respect of major developments (Dandara)

- Expand policy to take a comprehensive and co-ordinated approach to development including respecting site constraints and utilities situated within sites (National Grid Electricity Transmission, National Grid Gas Transmission)
- A number of further design criteria are suggested to minimise fire risk and spread of fire, ensure safe access, and reduce risks to water sources (Essex County Fire and Rescue Service)
- Design should be flexible and not be over prescriptive and limiting, to account for changes in building techniques, market expectations, viability and best practice (Higgins Group)
- The cross reference to Policy DM25 is not necessary (Vistry Group)
- Clarify the supporting text to avoid contradiction with main part of policy (CNG Fuels Limited).

| <b>CCC response to the comments made</b>  |
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| Site constraints and facilities are considered to be covered by Part A) of the Policy and specific site policies, so no change is required. |
| Design criteria in relation to fire safety are covered by Building Regulations, so it is not necessary to repeat them in the Policy.        |

#### Policy DM24 – Design and Place Shaping Principles in Major Developments:

Summary of Representations – main issues and suggested changes:

- Overall support for the policy (Wates Developments and Hammonds Estates LLP, Dominus Chelmsford Limited, Chelmsford & Central Essex RSPB Local Group); and in particular the reference to Sport England’s Active Design Guidance (Sport England)
- Residential institutions (Class C2) should also be subject to Health Impact Assessment and to seek Livewell Accreditation (Essex County Council)
- Swift bricks should be required in accordance with best practice (Swifts Local Network: Swifts & Planning Group)
- Design codes would not be sufficiently flexible to respond to specific circumstances (CNG Fuels)
- Further definition of the circumstances where design codes would be expected would help to clarify whether both a design code and a masterplan would be required (CJH Farming, Pigeon (Sandon) Ltd).

| <b>CCC response to the comments made</b>   |
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| Bullet 6 amended to include utilising integrated water management techniques.  |
| A range of biodiversity features that can be considered is included in the Reasoned Justification and in the Council’s making Places SPD. Inclusion of a specific policy requirement to provide swift bricks is not supported. |
| References in the Policy to Masterplans are considered to be clear and provide sufficient scope.   |

#### Policy DM25 – Sustainable Buildings

Summary of Representations – main issues and suggested changes:



- Overall support for the policy (Wates Developments and Hammonds Estates LLP, Chelmsford & Central Essex RSPB Local Group, CJH Farming, Pigeon (Sandon) Limited, Dominus Chelmsford Limited)
- Support the principle for a water efficiency target, but recommend a more ambitious standard of 80-100 litre/person/day (Essex County Council); 100 litre/person/day as a minimum using a fittings based approach (Anglian Water Services)
- Support for rainwater harvesting (Essex County Council, Anglian Water Services)
- SuDS can be utilised to minimise overall water use (Anglian Water Services)
- Support for development having regard to the Essex Parking Guidance, and the Electric vehicle Charge Point Strategy (Essex County Council)
- Swift bricks should be required in accordance with best practice (Swifts Local Network: Swifts & Planning Group)
- Concern at the introduction of requirements in S2, DM31 and DM25 that go beyond Building Regulations, which may impact viability and deliverability of residential development (Hopkins Homes Ltd, Dandara, Whirledge and Nott, Croudace Homes) and become out of date as standards evolve (Boyer Planning)
- Provision for electric vehicle charging is covered by Building Regulations so should not be duplicated (Hopkins Homes Ltd, Home Builders Federation, Dandara); or the policy should set out where requirements go beyond Building Regulations (Chelmsford Garden Community Consortium, Vistry Group)
- Include a threshold for provision of public EV charging points, which may not be a reasonable requirement on smaller sites (Whirledge and Nott, Croudace Homes)
- Water efficiency targets are covered by Building Regulations, and the policy does not allow for flexibility and therefore is likely to become out of date quickly (Dandara, Hill Residential Ltd)
- Policy should recommend rather than require rainwater harvesting and be limited to garden irrigation (Chelmsford Garden Community Consortium, Vistry Group)
- The threshold for BREEAM assessment should be raised to 1,000sqm, less is unlikely to lead to enhanced sustainable design (Chelmsford Garden Community Consortium, Vistry Group).

| <b>CCC response to the comments made</b> |
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| Policy amended to require a water efficiency standard of 90 litres/person/day; and for non-residential buildings above a threshold to meet a national water consumption measure. |
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| Policy amended to include utilising integrated water management techniques. |
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| EV charging point infrastructure requirements have been updated to reflect ECC's Parking Standards update; therefore the reference to the EV parking standards set out in the Policy is considered appropriate. |
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| A range of biodiversity features that can be considered is included in the Reasoned Justification and in the Council's making Places SPD. Inclusion of a specific policy requirement to provide swift bricks is not supported. |
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Policy DM31 – Net Zero Carbon Development (In Operation)

## Summary of Representations – main issues and suggested changes:

- Fully support the policy (Wates Developments and Hammonds Estates LLP, Dominus Chelmsford Limited, Obsidian Strategic Asset Management Ltd, Essex County Council)
- Supportive of the need to support net zero carbon development and the principles of what the policy is seeking to achieve (ARU, Chelmsford & Central Essex RSPB Local Group, Dandara, Vistry Group, Chelmsford Garden Community Consortium)
- Striving to achieve net-zero carbon homes at a faster rate than the Council's and the UK Government's target of net zero carbon emissions is commendable (McCarthy Stone, Gleeson Land)
- Support the principle of energy efficient and sustainable buildings but this should be in line with Building Regulations (Richborough, Home Builders Federation)
- Going beyond Building Regulations goes against the written Ministerial Statements, the NPPF and Planning Policy Guidance (McCarthy Stone, Croudace Homes, Whirledge & Nott, Home Builders Federation)
- Any over provision of Building Regulations should be advisory or supportive, rather than a policy requirement (Richborough)
- The impact of this policy on the viability and deliverability of residential development has not been considered in the plan, its evidence base, or by the IIA (Hopkins Homes Ltd, Home Builders Federation)
- The policy should be amended to provide flexibility with regard to achieving Net Zero Carbon depending on viability (Gleeson Land, Dandara, Croudace Homes, Whirledge & Nott, Higgins Group)
- Exceeding national requirements and setting local standards provide inconsistency across the country, hampering investment and has the potential to impact upon viability and the delivery of housing in the area (Richborough, Vistry Group, Chelmsford Garden Community Consortium, Gladman, Higgins Group, Hill Residential Ltd)
- For the policy to be flexible and justified over the plan period, the requirements need to better reflect the Building Regulations requirements and allow applicants to take a combined approach subject to each individual site (Hill Residential Ltd)
- The implications of such a policy have not been properly assessed in the supporting evidence base (Home Builders Federation)
- The Local Plan Viability Study should be updated to reflect the costs identified in Report 1 of the Essex Net Zero Policy Study – Technical Evidence (Essex County Council)
- The size threshold for requirements 1-5 to apply is too low (ARU)
- Requirement 2: Future Homes Standard will ensure all new homes to be zero carbon ready so it is unnecessary to include this as it will already be addressed through building regulations by the time the local plan review is adopted (Home Builders Federation)

- Supports the policy and the securing of financial contributions where on-site carbon mitigation requirements cannot be met. NHS property could benefit from carbon offset funds (NHS Property Services Ltd)
- Requirement 4: On-site renewable energy generation needs to be applied flexibly. The level of energy use from unregulated sources is beyond the control of the developer and as such it is unreasonable to require the developer to make a payment in order to offset use from these sources (Pigeon (Sandon) Ltd, Higgins Group, Hill Residential Ltd, Home Builders Federation)
- The use of solar PV is a key contributor to achieving Net Zero, but other technologies and approaches may be more suitable for various developments and there needs to be flexibility to deliver what is necessary for the site (Hill Residential Ltd, ARU)
- Requirement 5: Monitoring development for the first five years is beyond the scope of what local planning authorities can require of a developer. Energy use will depend significantly on the occupant and how they use it (Home Builders Federation)
- Suggest amendments to Table 7 to improve clarity, which will be reflected in a revised Essex 'model policy' document to support the policy (Essex County Council)
- Applying this policy retrospectively to allocations within the adopted Local Plan would impact their viability and deliverability (Hopkins Homes Ltd)
- Relying solely on renewable fuel provided on sites is too greater risk. A "safety net" of mains electricity from the grid should be available in case the installation, designs or calculations fall short of expectations (Chelmsford & Central Essex RSPB Local Group)
- Other local authorities are mentioning the use of sustainable building materials (such as the use of home grown timber) in their new local plans (Forestry Commission England)
- Consider developing the points raised on overheating in the Reasoned Justification into a specific plan policy to give greater weight to mitigating overheating risk in new development proposals (Essex County Council)
- The new Essex evidence-led 'model policy' to address embodied carbon emissions from new development, and its supporting evidence base, should be included as an additional policy (Essex County Council).

#### **CCC response to the comments made**

Local Authorities have statutory powers to set planning policies which require energy efficiency standards that are better than Building Regulations as long as these are evidenced and justified, and policies can be expressed using energy metrics if they are supported by an evidence base that justifies their viability. The legal justification is set out in the Essex Open Legal Advice - Energy Policy and Building Regulations (February 2024), which should be read alongside the [TCPA resource page](#) (16<sup>th</sup> July 2024) which addresses the latest situation regarding the Written Ministerial Statement (WMS) 13<sup>th</sup> December 2023, including a [guest blog by Estelle Dehon KC](#) which highlights important clarifications on the WMS 2023

confirmed through published correspondence directly with the former Secretary of State for Levelling Up, Housing and Communities. No changes required.

The Building Regulations set minimum standards that must be achieved for energy performance in new homes and buildings. These are a 'floor' and not a 'ceiling'. Planning policy is necessary to address the shortcomings within the Building Regulations 2021 and the proposed Future Homes Standard 2025, which do not adequately address operational carbon emissions from new development as they only cover a proportion of energy use of a building, namely regulated energy use and they rely on grid decarbonisation to achieve 'net zero'.

Regulated energy use only makes up about half of the energy used in a building. The other half is known as 'unregulated' energy and this is not covered by Building Regulations at all. Policy DM31 covers both types and so ensures that carbon emissions from a buildings total energy use are addressed and hence delivers truly net zero carbon buildings in operation. No changes required.

It is widely acknowledged by industry that the 'Standard Assessment Procedure' (SAP) software is not an accurate software for predicting the energy performance of a building. It was never intended to be, it is a compliance software only. The former Government recognised this issue and began consulting upon the introduction of new software to replace SAP – known as the Home Energy Model. However, this has not progressed further yet. It is therefore reasonable to require major developments to use existing and well-established reliable and accurate predictive energy modelling software to demonstrate policy compliance. Minor developments may follow the 'minimum fabric specifications approach' as set out in the Reasoned Justification to provide some flexibility to smaller developers who may not wish to invest in predictive energy modelling software. In addition, as part of the wider Essex Authorities work on supporting the implementation of the net zero policy, a 'SAP conversion tool' which can be used on smaller developments to demonstrate policy compliance using SAP outputs has been created. Reference to this has been added to the Reasoned Justification.

Essex wide viability reports support the policy requirements and have fed into CCC Local Plan Viability testing and are shown to be viable. No changes required.

CCC Local Plan Viability testing has been updated to reflect the costs identified in Report 1 of the Essex Net Zero Policy Study – Technical Evidence (July 2023).

The policy applies to 1 dwelling and above, and this is supported by the Essex evidence base. The policy does seek to limit the potential burden of reporting requirements for minor developments (under 10 dwellings) by offering a 'minimum standards approach' to be followed as an alternative to submitting an energy strategy which includes the use of predictive energy modelling. No changes required.

The Future Homes Standard is not in place yet, it has only been consulted upon and the new Government has not yet responded. There is no guarantee it will be in place in a certain timescale. Therefore, to ensure all new homes and buildings are fossil fuel free in Chelmsford, the method that is under direct control of the local authority is the Local Plan and Policy DM31. No changes required.

Solar PV was selected to be modelled in the evidence base to demonstrate net zero because it is the cheapest, and most mature and commonly available renewable energy technology that is suitable for buildings to incorporate. Consideration has been given to the request to replace solar PV with renewable energy generation. However, as the Evidence is based on solar PV as this is the cheapest, most mature, commonly available and cost effective technology

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| reference to 'rooftop' before solar PV has been added to this policy requirement to make this clear, and is what the evidence justifies the policy requiring.   |
| The Essex Net Zero Policy Study (July 2023) demonstrates that it is technically feasible at reasonable cost to accommodate sufficient rooftop solar PV on new homes to match the predicted annual average energy demand from the building. The Policy includes an energy offsetting clause that can be triggered in circumstances where it is not practically feasible to achieve this. The developable area of a site will not be reduced as a result of the Requirement 4 because evidence shows the requirement can be met through rooftop solar PV. The requirement is based on the buildings total energy use – and that includes both regulated and unregulated energy uses - because that is the true impact of the development proposal and can be reliably predicted at design stage through energy modelling. |
| Development sites will still be connected to the mains electricity grid as normal to ensure consistency in energy supply and meet the fluctuations in energy demand. The renewable energy generation on-site will also be connected to the electricity grid. It is just that roof top solar PV on buildings will be used by those occupiers in the first instance and any excess then is exported to the grid which benefits the decarbonisation of the grid too. Vice versa happens when not enough electricity is generated by the roof top solar PV to meet the energy needs of the occupiers, for example, in winter. No changes required.  |
| The requirement for in-use monitoring applies to large scale developments of 100 dwellings or more and only requires energy information to be collated from a sample of dwellings equating to 10%. This is 10 homes on a 100 home scheme. It is considered a reasonable sample to require in order for a developer to benefit from a meaningful set of results which can then be used to aid continuous learning and improvement on the delivery of net zero homes. The Policy is flexible in how this information is to be collected, the developer can consider the most appropriate method for them and put forward a monitoring strategy at the appropriate time in the planning process. No changes required.  |
| The energy offsetting mechanism enables flexibility in the policy to accommodate those developments where it is not technically feasible to achieve an on-site energy balance to still achieve 'net zero'. This is a well established approach. No changes required.  |
| The table relating to 'Minimum Standards Approach Fabric Specifications (Domestic)' has seen minor amendments to improve clarity, which is a reflection of changes to the revised Essex 'model policy'.   |
| Matters of overheating have been included into Policy S2 to give greater weight to mitigating overheating risk in new development proposals.  |
| The new Essex evidence-led 'model policy' to address embodied carbon emissions from new development, and its supporting evidence base, was not available at an appropriate time to test and include as an additional policy in the Pre-Submission Local Plan. No changes required.  |
| The policy supports delivery of the Council's declared climate and ecological emergency in 2019 and proposed work towards reaching net zero by 2030.  |

## Policy DM26 – Design Specification for Dwellings

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP)

- Swift bricks should be required in accordance with best practice (Swifts Local Network: Swifts & Planning Group)
- Support expressed for the overall policy objective, but further clarification on the Council's open space requirements and private amenity spaces would be helpful in this policy wording (Vistry Group).

**CCC response to the comments made**

A range of biodiversity features that can be considered is included in the Reasoned Justification and in the Council's making Places SPD. Inclusion of a specific policy requirement to provide swift bricks is not supported.

Policy DM27 – Parking Standards

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP).

**CCC response to the comments made**

No changes. However, policy changes have been made to reflect the latest ECC Parking Guidance.

Policy DM28 – Tall Buildings

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP, Historic England)
- More clarification is needed on how a site is assessed for its suitability for higher intensity development (Highgate Capital Limited)
- Add additional wording to include other locations that are well served by public transport (Vistry Group).

**CCC response to the comments made**

Suitability for higher intensity development is covered in the Reasoned Justification.

Proposals outside the City Centre will be considered on their merits, where a view on the suitability of other locations can be taken.

Protecting Living and Working Environments

Key statistics:

| Consultation point                                       | Yes | No | Comments | Total number of responses |
|--|-----|----|----------|---------------------------|
| Policy DM29 – Protecting Living and Working Environments | 1   |    | 1        | 1                         |
| Policy DM30 – Contamination and Pollution                | 2   |    | 3        | 3                         |

## Policy DM29 – Protecting Living and Working Environments

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP).

### **CCC response to the comments made**

No changes. However, policy changes have been made for clarification.

## Policy DM30 – Contamination and Pollution

Summary of Representations – main issues and suggested changes:

- Support for the policy (Wates Developments and Hammonds Estates LLP, Chelmsford & Central Essex RSPB Local Group)
- Re-development of land affected by contamination is encouraged as it is a sustainable approach (Environment Agency).

### **CCC response to the comments made**

Reasoned Justification amended to ensure developments accord with the latest technical guidance with regards to land contamination.

## **Monitoring Framework**

This section of the consultation document deals with how the Council will monitor the Local Plan's success in meeting the challenges and opportunities set out in the Strategic Priorities to ensure that it is effective in delivering the objectives of the Local Plan.

Key statistics:

| <b>Consultation point</b> | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---------------------------|------------|-----------|-----------------|----------------------------------|
| Table 8                   | 0          | 0         | 1               | 1                                |

Summary of Representations – main issues and suggested changes:

- S14 Page 326 - Amend 'Key Trigger' to read: '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' and 'Trigger for Action' to read: '(1) 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' (Essex County Council)
- S14 Page 326 - Consider if reference should be made to 'initial assessments' (Essex County Council)
- S14 Page 326 - Provide further clarification on the process and details for 'an initial assessment' for developments for example, desktop, rapid and full/comprehensive (Essex County Council)

- S14 Page 326 - Consider an additional indicator that captures how HIA's are effectively and positively influencing proposals and achieving what they are set out to do (Essex County Council).

| <b>CCC response to the comments made</b>   |
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| Not necessary to add Use Class after C2 and to do so would be inconsistent with the rest of the Local Plan.  |
| Suggestions relating to types of HIA assessment are addressed in changes set out under Strategic Policy S14. |
| No change to include the proposed additional HIA indicators as it is unclear how this would be monitored.    |

### **Draft Policies Map**

This section of the consultation document sets out the Draft Policies Map which illustrate sites for development or protection within the Local Plan.

Key statistics:

| <b>Consultation point</b>                 | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|---|------------|-----------|-----------------|----------------------------------|
| Draft Policies Map (Paragraphs 11.1-11.3) | 1          | 4         | 5               | 5                                |
| Map 3 – Chelmsford Urban Area             | 1          | 4         | 5               | 5                                |
| Map 5 – South Woodham Ferrers             | 0          | 0         | 1               | 1                                |
| Map 8 - Bicknacre                         | 0          | 2         | 2               | 2                                |
| Map 11 – Chatham Green                    | 0          | 1         | 1               | 1                                |
| Map 12 - Danbury                          | 0          | 1         | 1               | 1                                |
| Map 16 - Galleywood                       | 0          | 0         | 1               | 1                                |
| Map 23 – Little Waltham                   | 0          | 1         | 1               | 1                                |
| <b>Rural Employment Areas</b>             |            |           |                 |                                  |
| None                                      | 0          | 0         | 0               | 0                                |
| <b>Other Maps</b>                         |            |           |                 |                                  |
| None                                      | 0          | 0         | 0               | 0                                |
| Legend                                    | 0          | 0         | 0               | 0                                |

### **Chelmsford Urban Area (Map 3)**

Summary of Representations – main issues and suggested changes:

- Revise Chelmsford Urban Area to include areas of development and land east and south of the A12 (along Main Road and Paynes Lane, Boreham) (Aquila Developments, CNG Fuels)
- Revise to allocate Chantry Farm, Waltham Road, Boreham for Specialist Housing for the elderly (Mark Jackson Planning)
- SGS16a (Hammonds Farm) - Exclude land north of the River Chelmer from the Country Park and site boundary and retain in agricultural use, add the



indicative route for the access route to Junction 19, and reduce the eastern development boundary to exclude land in Flood Zones 2 and 3 adjacent to Sandon Brook (Wates Developments and Hammonds Estates LLP)

- Allocate land at north west Chelmsford, north of the existing settlement boundary (Dandara Eastern)
- Allocate land north of Runsell Lane to help meet local housing needs whilst minimising harm and protecting the purposes of the Green Belt (Obsidian Strategic)
- Expand Widford Industrial Estate to the west to support Saxtons 4x4 and to better align with the Spatial Strategy (Saxtons 4x4)
- Expand Growth Site 15 to include further land to the west to reflect the full extent of the deliverable site (CLH Farming Ltd).

#### South Woodham Ferrers (Map 5)

Summary of Representations – main issues and suggested changes:

- A dual carriageway on the A132 and a northern bypass on the B1012 are required rather than ‘Route Capacity Improvements’.

#### Bicknacre (Map 8)

Summary of Representations – main issues and suggested changes:

- Revise settlement boundary to include the entire Priory Pet & Country Supplies Store site, Horseshoe Farm to reflect recent planning history (Strutt & Parker)
- Allocate land north of Roxwell Road as an extension to Location 2 – West Chelmsford which performs better when compared against Hammonds Farm (Taylor Wimpey)
- Object to allocation of a new Garden Community at Hammonds Farm which is not deliverable by 2041 or justified by the evidence base Farm (Taylor Wimpey)
- Unclear why the Defined Settlement Boundary cuts through gardens.

#### Chatham Green (Map 11)

Summary of Representations – main issues and suggested changes:

- Increase the settlement boundary to make it more sustainable by including Pondsides Nursery and Yard and allocating it for employment or residential development (Mr and Mrs Andrew Parker).

#### Danbury (Map 12)

Summary of Representations – main issues and suggested changes:

- Allocate land north of Runsell Lane to help meet local housing needs whilst minimising harm and protecting the purposes of the Green Belt (Obsidian Strategic).

## Galleywood (Map 16)

Summary of Representations – main issues and suggested changes:

- The defined settlement boundary has been drawn to exclude any worthwhile housing sites apart from site 4. The plan should be more flexible to allow the growth of Galleywood (Park View Group).

## Little Waltham (Map 23)

Summary of Representations – main issues and suggested changes:

- Remove Green Wedge notation from land between 148 The Street and The Warren, Braintree Road and allocate for housing (Mr Paul Hopkins).

No comments to other maps.

| <b>CCC response to the comments made</b>  |
|---|
| The site boundaries have been reviewed ahead of publishing the Pre-Submission Draft Policies Map. Boundaries are supported by the plan evidence base including the Landscape Sensitivity and Capacity Study and Employment land Review 2023.  |
| Boundary changes have been made for site policy 16a (Hammonds Farm) including change to the eastern boundary to remove flood zones 2 & 3, removal of section of the northern parcel and revised Country Park boundary and inclusion of areas for future recreation use for SuDS and or biodiversity – see more information under the site policy.   |
| Further expansion at West Chelmsford (Location 2) and Broomfield (Location 8) have been considered and tested but rejected due to their impact on and the capacity of the local road network and their relative remoteness from the strategic road network. Unbuilt allocated sites rolled forward from the adopted Local Plan are considered to represent sustainable and sound development allocations which have been previously subject to Independent Examination. |
| There are no proposed changes to the Green Belt. Proposed site allocations are focused at settlements outside the Green Belt, informed by a Settlement Hierarchy to select sustainable locations.   |
| The site boundary for Site 15 Little Boyton Hall Farm is supported by the evidence base including the Landscape Sensitivity and Capacity Study and therefore no changes are proposed.   |
| There is no evidence to suggest that a dual carriageway on the A132 and a northern bypass on the B1012 are required.  |
| The Bicknacre DSB was proposed for extension on the Preferred Options Draft Policies Map to include the building, not the garden in relation to the approved planning application at Priory Pet & Country Supplies Store site, Horseshoe Farm. The garden has not been included in line with criterion 7 of the DSB methodology i.e. exclude land of predominantly open character at the edge of a settlement.  |
| The DSB methodology guidance states that the Urban Area Boundary/DSB will normally be drawn approximately 25m from the rear and side elevations of houses with large gardens (as well as pubs, churches and community halls).   |
| Chatham green is not included within the spatial strategy as an area of growth. Chatham Green has been considered and tested but rejected due to its relative isolation from existing services and facilities which would lead to higher reliance on  |

|   |
|---|
| the use of the private car, landscape capacity and sensitivity concerns and capacity limits at the wastewater recycling facilities serving the area.  |
| Minor adjustments are proposed to Defined Settlement Boundaries as part of the Pre-Submission Local Plan, and these are set out in the Urban Area and Defined Settlement Review Technical notes which forms part of the evidence base. These include changes around the proposed site allocations for new housing and employment. Chelmsford UAB will be extended with the inclusion of Location 16a (Hammonds Farm) and the employment site at Location 16b. |
| The Green Wedge is a locally important designation. Changes to the Green Wedge boundaries to allow development growth has been discounted as sufficient and suitable land elsewhere to meet development needs in a sustainable way.   |

## **Appendices**

This section of the consultation document contains four appendices.

Key statistics:

| <b>Consultation point</b>                                  | <b>Yes</b> | <b>No</b> | <b>Comments</b> | <b>Total number of responses</b> |
|--|------------|-----------|-----------------|----------------------------------|
| Appendix A – Schedule of Superseded Documents and Policies | 0          | 1         | 1               | 1                                |
| Appendix B – Development Standards                         | 0          | 0         | 0               | 0                                |
| Appendix C – Development Trajectories                      | 0          | 0         | 2               | 2                                |
| Appendix D – Glossary                                      | 1          | 1         | 5               | 5                                |

### **Appendix A – Schedule of Superseded Documents and Policies**

Summary of Representations – main issues and suggested changes:

- One comment received which relates to Policy DM2.

### **Appendix B – Development Standards:**

No comments.

### **Appendix C – Development Trajectories**

Summary of Representations – main issues and suggested changes:

- It seems highly unlikely that housing sites expected to deliver within the next 12 months will do, so the plan needs to allocate more deliverable smaller sites (Opus Little Waltham Developments Ltd)
- There is no evidence that 3,000 new homes at Hammonds Farm will be completed within the plan period, with a potential further 1,000 homes beyond 2041. Although large sites can deliver more homes per year over a longer time, they also have longer lead-in times. To secure short-term immediate boosts in supply – a good mix of smaller sites is necessary (Taylor Wimpey).

## Appendix D – Glossary

Summary of Representations – main issues and suggested changes:

- Add the following heritage related terms: listed buildings, conservation areas, scheduled monuments, registered parks and gardens and designated and non-designated heritage assets (Historic England)
- Add ‘constituted community organisation’ referred to in para. 1.43 (Essex County Council)
- Add terms related to specific cohorts for supported and specialist housing and accommodation such as older people and people with a learning disability (Essex County Council)
- Add a definition for Renewable and Low Carbon Energy (CNG Fuels Ltd)
- Add detail relating specifically to police, ambulance and fire and rescue facilities (Essex Police).

| <b>CCC response to the comments made</b>   |
|--|
| The Housing Trajectory and timings within it are established through the Council’s Five Year Housing Land Supply Methodology (April 2024). The Trajectory is updated annually, and the Pre-Submission Local Plan uses the latest available Housing Site Schedule (April 2024). |
| The heritage related terms proposed to be included were already in the Glossary but some have been updated or tweaked for clarity and consistency.   |
| A definition has been added for ‘renewable and low carbon energy’ for completeness.  |
| The definition of ‘infrastructure’ has been updated for clarity and completeness   |
| It is not considered necessary to include the remaining terms suggested.   |

## **List of Appendices**

**Appendix 1: Organisations consulted and copies of key consultation materials**

**Appendix 2 - Essex Highways responses to highway and transportation representations (Preferred Spatial Approach - Response to Representations (December 2024)**

**Appendix 3 - Letter from Natural England regarding designating Areas of Outstanding Natural Beauty (December 2023)**

**Appendix 4 - Letter from Welbeck land regarding access to Barbrook Way (Site allocation 11c)**

## **APPENDIX 1**

List of organisations consulted

Consultation Statement

Exhibition Panels

Pop-Up Stand

Pop-Up Stand on Site

Local Plan Video

Local Plan Virtual Exhibition

Essex Chronicle Advert

City Life Articles

South Woodham Focus Article

Local Plan Poster

Examples of Social Media Posts

GovDelivery Mailshot

Example Site Notices

Staff Email Banner

Bus Stop Adverts

Local Plan Newsletter

|   |
|---|
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### **Appendix A – Schedule of Superseded Documents and Policies**

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### **Appendix B – Development Standards:**

No comments.

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Local Plan Poster

Examples of Social Media Posts

GovDelivery Mailshot

Example Site Notices

Staff Email Banner

Bus Stop Adverts

Local Plan Newsletter

## List of organisations consulted

The Council notified more than 2,800 contacts registered on its Consultation Portal.

This included the specific and general contacts listed below, and members of the public who are not listed.

|   |   |  |
|---|---|--|
| 1st Chelmsford Scouts                             | Bakers Lane Action Group                          | Bradwell Power Generation Company Ltd  |
| A Dunn & Son                                      | Barking & Dagenham CCG                            | Braintree District Council   |
| A.R. Property Designs Ltd.                        | Barnes Farm Infant School                         | Brentwood and Chelmsford Green Party   |
| Abbess, Beauchamp & Berners Roding Parish Council | Barnston Parish Council                           | Brentwood Borough Council  |
| Abellio Greater Anglia                            | Barratt David Wilson                              | Bressole Limited   |
| Accord Energy Limited                             | Barratt Eastern Counties                          | Bridgewater Property Group Limited   |
| Active Workspace Ltd                              | Barton Willmore                                   | Broadfield Homes Ltd   |
| Age UK Essex                                      | Basildon & Brentwood CCG                          | Broomfield Neighbourhood Plan Steering Group   |
| Agency of Architecture                            | Basildon Borough Council                          | Broomfield Parish Council  |
| Aggregate Industries UK Ltd                       | Baya Homes  | Broomfield Parish Council, Chignal Parish Council, Great Waltham Parish Council, Little Waltham Parish Council, Writtle Parish Council and Newlands Spring Residents Association |
| AGS Cemetery and Crematoria Services              | BBC Essex   | Broomfield Primary School  |
| Aldi Stores Ltd                                   | BDP   | BT National Notice Handling Centre   |
| Alun Design Consultancy                           | Beaulieu Residents                                | BT Openreach, Southend ATE   |
| Anchor Housing                                    | Belport Limited                                   | Building Research Establishment  |
| Andrew Martin - Planning Ltd                      | Bennetts BMW Specialists                          | CAAG   |
| Angel Stores                                      | Berkeley Strategic                                | Campaign For Real Ale (CAMRA) Limited  |
| Anglia Ruskin University                          | Bidwells  | Campaign to Protect Rural Essex  |
| Anglian Water Services Ltd                        | Billericay Town Council                           | CAODS (Chelmsford Amateur Operatic & Dramatic Society)   |
| Aquila Developments                               | Bishops Primary School                            |  |
| Arcady Architects                                 | Black Notley Parish Council                       |  |
| Archerfield Homes                                 | Blackmore, Hook End & Wyatts Green Parish Council |  |
| Arriva The Shires and Essex                       | Bloor Homes (Eastern)                             |  |
| ASP   | BNP Paribas Real Estate UK                        |  |
| Atkins Telecom                                    | Boreham Conservation Society                      |  |
| Avison Young                                      | Boreham Parish Council                            |  |
| Aviva   | Boreham Primary School                            |  |
| b3 Architects LLP                                 | Bowler Energy LLP                                 |  |
| Baddow Hall Junior School                         | Boyer Planning                                    |  |

|   |  |   |
|---|--|---|
| Capital Property & Construction Consultants Ltd           | Chelmsford Canoe Club                    | CHP   |
| Carter Jonas  | Chelmsford City Centre Retailers Group   | Chris Marten Architectural Services                               |
| Castle Point & Rochford CCG                               | Chelmsford City Council                  | Chris Tivey Associates  |
| Castle Point Council                                      | Chelmsford City Football Club            | Christian Care  |
| Catton Homes  | Chelmsford Civic Society                 | Christian Growth Centre Chelmsford                                |
| CBRE  | Chelmsford College                       | Church of Our Lady Immaculate                                     |
| Cemex UK Properties Ltd                                   | Chelmsford Community Transport Limited   | Churchill Retirement Living                                       |
| Centrica Barry/ Generation/ KL/ PB/ RPS LTD               | Chelmsford Commuters & Rail Travellers   | Civil Aviation Authority  |
| CERA (Chignal Estate Residents Association)               | Chelmsford County High Schools for Girls | Claremont Planning  |
| Chancellor Park Primary School                            | Chelmsford CVS                           | Clark Partnership   |
| Channels Residents Community Group                        | Chelmsford Cycle Action Group            | Clarke & Simpson  |
| Charterhouse Property Group & Charterhouse Strategic Land | Chelmsford Garden Community Council      | CODE Development Planners   |
| Chartplan (2004) Limited                                  | Chelmsford Hindu Society                 | Colchester City Council   |
| Chelmer & Blackwater Navigation Co Ltd                    | Chelmsford Labour Party                  | Cold Norton Parish Council  |
| Chelmer Canal Trust                                       | Chelmsford Liberal Democrats             | Colliers International  |
| Chelmer Cycling Club                                      | Chelmsford Liberal Party                 | Collingwood Primary School  |
| Chelmer Housing Partnership                               | Chelmsford Mencap                        | Colt Technology Services  |
| Chelmer Residents Forum                                   | Chelmsford NAG                           | Columbus School & College   |
| Chelmer Valley High School                                | Chelmsford Rugby Football Club           | Commercial Estates Group  |
| Chelmer Valley Landscape Group                            | Chelmsford Safety Supplies               | Company of Proprietors of the Chelmer & Blackwater Navigation Ltd |
| Chelmer Village Parish Council                            | Chelmsford Social Club Ltd               | Confederation of Passenger Transport UK (Hedingham/Chambers)      |
| Chelmsford & Central Essex RSPB Local Group               | Chelmsford Star Co-operative Society Ltd | Connexions & Careers Chelmsford                                   |
| Chelmsford and District Model Railway Club                | Chelmsford Taxi Association Limited      | Cool Heat Services  |
| Chelmsford Biodiversity Forum                             | Chelmsford Theatre Workshop              | Corona Energy Retail 4 Ltd  |
| Chelmsford Business Board                                 | CHESS                                    | Countryside L&Q (North East Chelmsford) LLP                       |
|   | Chignal Estate Residents Association     | Countryside Properties (UK) Ltd                                   |
|   | Chignal Parish Council                   | CPRE Essex  |
|   |  | Craintern Ltd   |
|   |  | Crest Nicholson   |

|  |   |  |
|--|---|--|
| Crouch Vale Brewery Ltd                              | Dominvs Group                               | Epping Forest District Council           |
| Croudace Homes                                       | Downham CE (VC) Primary School              | ERGOTECHNICS                             |
| Crown Energy Ltd                                     | DTI   | Esperance energies                       |
| CSJ Planning Consultants Ltd                         | DWD Property & Planning                     | Essex & Suffolk Water                    |
| CT Planning  | E & M Design                                | Essex ARG                                |
| Cycling UK   | E.ON UK Plc                                 | Essex Association of Local Councils      |
| Danbury Mission                                      | E2V Technologies                            | Essex Biodiversity Project               |
| Danbury Neighbourhood Plan Steering Group            | East Anglia GREEN                           | Essex Bridleways Association             |
| Danbury Parish Council                               | East Anglia London Properties Ltd           | Essex Chamber of Commerce                |
| Danbury Park Community Primary School                | East Hanningfield Parish Council            | Essex Chronicle                          |
| Danbury Society                                      | East Hanningfield Parish Plan Committee     | Essex County Council                     |
| Dandara  | East Herts District Council                 | Essex County Fire and Rescue Service     |
| Data Energy Management Services Ltd                  | East of England Ambulance Service NHS Trust | Essex Fire                               |
| Defence Infrastructure Organisation (DIO)            | East Thames Housing                         | Essex Herts Air Ambulance Trust          |
| Department for Education                             | Eastlight Homes                             | Essex Local Nature Partnership           |
| Department for Levelling Up, Housing and Communities | Ecotricity                                  | Essex Police                             |
| Department for Transport (DfT)                       | EDF Energy                                  | Essex Police Fire and Crime Commissioner |
| Department of Trade and Industry                     | Education & Skills Funding Agency           | Essex Record Office                      |
| Derbyshire Gypsy Liaison Group                       | Edward Gittins Associates                   | Essex Respite and Care Association       |
| Design Council                                       | Edward Parsley Associates Ltd               | Essex Squash & Racketball Association    |
| detoxpeople ltd                                      | EE  | Essex Waterways Ltd                      |
| Development Land & Planning Consultants Ltd          | Elim Christian Centre                       | Essex Wildlife Trust                     |
| DevPlan UK   | Elm Green Preparatory School                | Estuary Design Ltd                       |
| DHA Planning   | Elmwood Primary School                      | Estuary Housing Association              |
| Diageo Pension Trust Fund                            | Energy Environment and Sustainability Group | Evolution Town Planning                  |
| Diocese of Chelmsford                                | English Rural Housing Association           | Exolum Pipeline System Ltd               |
| DMH Stallard   | ENI UK Ltd                                  | Eyott Sailing Club                       |
| Dominic Lawson Bespoke Planning Ltd                  | Enplan                                      | Farleigh Hospice                         |
|  | Environment Agency                          | Felsted Parish Council                   |

|   |   |  |
|---|---|--|
| Fenn Wright   | Great Baddow High School                    | High Easter Parish Council             |
| Fergusons   | Great Baddow High School                    | High Ongar Parish Council              |
| First Choice Residential Lettings                                 | Great Baddow Parish Council                 | Highways England                       |
| First Essex Buses   | Great Baddow St Mary                        | Highwood Parish Council                |
| Fisher German LLP   | Great Notley Parish Council                 | Highwood Primary School                |
| Flagship Housing Group Ltd  | Great Waltham C of E (VC) Primary School    | Highwood Village                       |
| Flaternity Residents association                                  | Great Waltham Parish Council                | Hill Residential Ltd                   |
| Fritch Green Parish Council                                       | Greater London Authority                    | Historic England                       |
| Football Association  | Green Planning Studio Ltd                   | HLR Consulting Ltd                     |
| Ford End Church of England Primary School                         | Greenfields Community Housing Ltd           | Home Builders Federation               |
| Ford End Village Design Statement Committee                       | Grosvenor Developments Ltd                  | Homes England                          |
| Forestry Commission England                                       | H M Prison Service                          | Hopkins Homes Ltd                      |
| Foster Partnership Farms  | Hamilton Bentley & Partners                 | House Of Commons                       |
| Fraser Halls Associates   | Harlequin Ltd                               | Howard Sharp & Partners LLP            |
| Friends, Families and Travellers and Traveller Law Reform Project | Harlow District Council                     | Howe Green Community Association       |
| G.T.C/Utility Grid Installations                                  | Hastoe Housing Association                  | Hullbridge Parish Council              |
| Galleywood Infant School  | Hatfield Peverel Parish Council             | Hunter Page Planning                   |
| Galleywood Parish Council   | Havering CCG                                | Hylands School                         |
| GB Partnerships   | Havering London Borough                     | Iceland Foods Ltd                      |
| Gladman Developments Ltd  | Health and Safety Executive                 | Iceni Projects                         |
| Gleeson Land  | Heart of Essex Local Enterprise Partnership | Ideas Hub                              |
| Going Places Leisure Travel Ltd                                   | Heathcote School                            | Indigo Planning                        |
| Good Easter Parish Council  | Heatons                                     | Indigo Planning Ltd                    |
| Good Easter Village Hall  | Help The Aged                               | Ingatestone & Fryerning Parish Council |
| Graham Anthony Associates   | Helping Hands Essex                         | Ingatestone Village Design Statement   |
| Grangewood Brentwood Ltd  | Heritage Writtle                            | Ingleton Wood (Billericay)             |
| Great & Little Leighs Parish Council                              | Hertfordshire and West Essex ICB            | Intergen                               |
| Great Baddow Beehive Lane County Primary School                   | Hertfordshire County Council                | J. Aron & Company                      |
|   | hgh Consulting                              | Jacobs UK Limited                      |
|   | Higgins Group                               | James Development Ltd                  |
|   |   | JB Planning Associates Ltd             |
|   |   | JCN Associates Ltd                     |
|   |   | JCN Design Ltd                         |

|   |  |  |
|---|--|--|
| JMS Planning & Development Ltd                                    | London Borough of Enfield                              | Mid Essex Hospital Services NHS Trust        |
| John H Bayliss & Co   | London Borough of Redbridge                            | Mid Essex Primary Care Trust                 |
| Keeble Brothers   | London Borough of Waltham Forest                       | Mid-Essex Business Group                     |
| Keeran Designs Ltd  | London Gypsies and Travellers Unit                     | Mildmay Infant and Nursery School            |
| Kemsley LLP   | Longfield Solar Farm                                   | MJD Planning                                 |
| King Edward Grammar School  | Lower Thames Crossing                                  | Moat Homes                                   |
| Kings Hardware Ltd  | LSL Partners   | Mobile Broadband Network Limited             |
| Kings Road Primary School   | Maldon District Council                                | Mono Consultants Ltd                         |
| Kings Road/North Avenue Community Action Group                    | Maltese Road Primary School                            | Montagu Evans                                |
| KLW Planning  | Mansfield Monk Limited                                 | Moody Homes Ltd                              |
| KM Consulting   | Marconi Plaza Residents Association                    | Moulsham High School                         |
| L&Q   | Margaret Roding Parish Council                         | Moulsham Infant School                       |
| Lambert Smith Hampton   | Margaretting CE (VC) Primary School                    | Moulsham Junior School                       |
| Landscape Planning Group Ltd (including Landscape Planning & OCA) | Margaretting Parish Council                            | Moulsham Mill Partnership                    |
| Langford and Ulting Parish Council                                | Marine Management Organisation (MMO) HM Government     | Mountnessing Parish Council                  |
| Lanpro  | Mark Jackson Planning                                  | N Clark Welding & Fabrication                |
| Larkrise Primary School   | Marrons Planning                                       | Nabbotts County Infants School               |
| Larmar Engineering  | Mashbury Parish Council                                | Nathaniel Lichfield and Partners             |
| Latimer Homes   | Master Designs Essex                                   | National Gas Transmission                    |
| Lawford Mead Primary & Nursery School                             | McDonald's Restaurants                                 | National Grid UK                             |
| Lawns Action Group  | Meadgate Primary School                                | National Highways                            |
| Little Baddow Parish Council                                      | Meadows Shopping Centre                                | Natural England                              |
| Little Baddow Society   | Melville Dunbar Associates                             | Neos Networks                                |
| Little Dunmow Parish Council                                      | Michael Benham Acquisition/Disposal of Land & Property | Network Rail                                 |
| Little Waltham C E V A Primary School                             | Mid and South Essex ICS                                | New Hall School                              |
| Little Waltham Parish Council                                     | Mid and South Essex Integrated Care Board (ICB)        | Newlands Spring Primary School Academy Trust |
| Lodge Coaches   | Mid Essex Gravel Pits (Chelmsford) Ltd                 | Newlands Spring Residents Association        |
| London Borough of Barking and Dagenham                            |  | Nexus Planning                               |
|   |  | NGB Essex Angling                            |

|  |  |   |
|--|--|---|
| NGB Essex Athletics                          | Our Lady Immaculate R C Primary School             | Ramsden Crays Parish Council            |
| NGB Essex Basketball                         |  |   |
| NGB Essex Boccia                             | Parkway and Town Centre Neighbourhood Action Panel | Rapleys                                 |
| NGB Essex Bowls                              | Parkwood Academy                                   | Rawreth Parish Council                  |
| NGB Essex Cricket                            | Paul Dickinson & Associates                        | Rayleigh Town Council                   |
| NGB Essex Cycling                            | Pegasus Group                                      | Raymond Stemp Associates                |
| NGB Essex Fencing                            | Perryfields County Infants School                  | Rayne Parish Council                    |
| NGB Essex Football                           | Perryfields Junior School                          | RCCE                                    |
| NGB Essex Gymnastics                         | Persimmon Homes Essex                              | Redbridge CCG                           |
| NGB Essex Hockey                             | Phase 2 Planning & Development                     | Rentplus (Agents Tetlow King Planning)  |
| NGB Essex Lacrosse                           | Pinnacle Planning                                  | Reprohouse Limited                      |
| NGB Essex Movement and Dance                 | PKC Retail Ltd                                     | Resting Places Limited                  |
| NGB Essex Orienteering                       | Place Services Historic Environment Team           | Retail Focus                            |
| NGB Essex Rowing                             | PlanIt Planning and Development Ltd                | Rettendon Common Residents Association  |
| NGB Essex Rugby Union                        | Planning Issues Ltd                                | Rettendon Parish Council                |
| NGB Essex Sailing                            | Planning Potential                                 | Rettendon Primary School                |
| NGB Essex Squash                             | Planware Ltd                                       | Rettendon Site Leaseholders Association |
| NGB Essex Triathlon                          | Plater Claiborne Architecture & Design             | River Crouch Conservation Trust         |
| NGB Essex Volleyball                         | Pleshey Parish Council                             | Road Haulage Association                |
| NHS England East                             | Pomery Planning Consultants                        | Robert Brett & Sons Ltd                 |
| NHS North East London                        | Premier Homes                                      | Robinson and Hall                       |
| NHS South East and South West Essex          | Princes Rd Allotment Association                   | Rochford District Council               |
| NHS Suffolk and North East Essex ICB         | Priory Primary School                              | Roxwell CoE (VC) Primary School         |
| NIBS Buses                                   | PRS  | Roxwell Parish Council                  |
| Nigel Chapman Associates                     | PS Planning & Design                               | Royal Mail Group                        |
| North Central London CCG                     | Ptarmigan Group and Chelmsford Land Ltd            | Royal Society For Protection of Birds   |
| North Essex Partnership NHS Foundation Trust | Ptarmigan Land Ltd                                 | RPS Planning & Development Ltd          |
| North Fambridge Parish Council               | Purleigh Parish Council                            | RSPCA                                   |
| North West Parishes Group                    | Ramblers Essex Area                                | Rubicon West Plc                        |
| Northern Trust                               | Ramsden Bellhouse Parish Council                   | Rugby Football Union                    |
| Oaklands Infants School                      |  | Rugbytots Central Essex                 |
| Office of Rail Regulation                    |  |   |



|  |   |  |
|--|---|--|
| Runwell Parish Council                           | Sport England                               | Terence O'Rourke Ltd                                 |
| Rural Community Council of Essex                 | Springboard Housing Association Ltd         | Terling and Fairstead Parish Council                 |
| Rural Solutions Ltd                              | Springfield Parish Council                  | Tetlow King Planning                                 |
| Ruston Planning Limited                          | Springfield Primary School                  | The Alternative Accommodation Agency Ltd             |
| S A Mynard Limited                               | Springfields Planning & Development Limited | The Beaulieu Park School                             |
| Sandon Parish Council                            | SSE Pipelines Ltd                           | The Boswells School                                  |
| Sandon school                                    | St Anne's Preparatory School                | The Cathedral School Chelmsford                      |
| Save Sandford Mill Campaign                      | St Augustine's Catholic Church              | The Chelmsford Ballet Company                        |
| Savills (UK) Limited                             | St Cedd's School                            | The Chelmsford Labour Party                          |
| Scott Brownrigg                                  | St John Payne Catholic School               | The Chelmsford Society                               |
| Scottish & Southern Energy Pipelines             | St John's C of E Primary School             | The Downes Planning Partnership                      |
| Sellwood Planning                                | St Joseph's Catholic Primary School         | The Essex Badger Protection Group                    |
| Shirley Smith & Co                               | St Mary's CE Primary School                 | The Inland Waterways Association (Chelmsford Branch) |
| Shotgate Parish Council                          | St Mary's Church Great Baddow               | The John Bishop Partnership                          |
| Sky Telecommunication Services Ltd               | St Peters Primary School                    | The JTS Partnership LLP                              |
| Smart Planning                                   | St Pius X Catholic Primary School           | The Land Trust                                       |
| Smiths Environmental Products Ltd                | St. Michael's Junior School                 | The Landscape Conservation Trust                     |
| South East LEP                                   | Stephenson's of Essex Ltd                   | The National Federation of Gypsy Liaison Groups      |
| South Hanningfield Parish Council                | Stevens VW Dismantlers                      | The National Trust                                   |
| South Molton Real Estate Ltd                     | Stock CE Primary School                     | The Newspaper Society                                |
| South Woodham Action Group                       | Stock Parish Council                        | The Owen Partnership                                 |
| South Woodham Ferrers Health & Social Care Group | Stonebond Properties Ltd                    | The Planning Bureau                                  |
| South Woodham Ferrers Town Council               | Stow Maries Parish Council                  | The Royal Horticultural Society                      |
| Southend Borough Council                         | Strutt & Parker LLP                         | The Sandon School                                    |
| Southend CCG                                     | Swan Housing Association                    | The Showmen's Guild of Great Britain                 |
| Southern Electric                                | Sworders                                    |  |
| SP PowerSystems                                  | Tarmac                                      |  |
| SPD Studio                                       | Telecom Plus PLC                            |  |
| Sphere 25  | Tendring District Council                   |  |

|   |  |  |
|---|--|--|
| The Showmen's Guild of Great Britain London and Home Counties | Trinity St Mary's CE (VA) Primary School | Whirledge and Nott                             |
| The Tyrells Primary School                                    | Tritton Family Trust                     | Wickford Town Council                          |
| The Wilderness Foundation UK                                  | Turley Associates                        | Widford Lodge Preparatory School               |
| The Women's National Commission                               | UK Power Networks                        | William de Ferrers School                      |
| Theatres Trust  | Uttlesford District Council              | Willingale Parish Council                      |
| Third Dimension Group Ltd                                     | Valco UK Ltd                             | Wilson Construction Ltd                        |
| Thomas Dixon Developments Ltd                                 | Village Hall Committee                   | WM Morrison Supermarket Plc                    |
| Three   | Virgin Media Services                    | Women's Institute                              |
| Thriftwood School   | Vitol Gas Ltd                            | Woodham Ferrers & Bicknacre Parish Council     |
| Thurrock Borough Council                                      | Vodafone and O2                          | Woodham Mortimer with Hazeleigh Parish Council |
| Timpsons  | W&H Marriage & Sons Ltd                  | Woodham Walter Parish Council                  |
| TMA Chartered Surveyors                                       | Waitrose Ltd                             | Woodland Trust                                 |
| Tolhurst Fisher LLP Solicitors                                | Wardrop & Co Ltd                         | Woodville Primary School                       |
| Total Gas and Power Ltd                                       | Warwick Court Property Company           | Woolf Bond Planning                            |
| Transition Chelmsford   | Waterhouse Farm Residents Association    | Writtle Infant School                          |
| Transport East  | Wates Developments Limited               | Writtle Junior School                          |
| Transport for London  | WEA Sec                                  | Writtle Neighbourhood Plan Group               |
| Traveller Law Reform Project                                  | Welbeck Strategic Land                   | Writtle Parish Council                         |
| Travelling Showman's Guild                                    | Welsted Joinery Ltd                      | Writtle Surgery                                |
| Tree Fella Plc  | West Hanningfield Parish Council         | Writtle VDS                                    |
| Trinity PPP Limited   | West Register (Realisations) Ltd         | YMCA   |
| Trinity Road Primary School                                   | Westlands Community Primary School       |  |
|   | WH Marriage & Sons Ltd                   |  |

## **REVIEW OF CHELMSFORD LOCAL PLAN**

### **REGULATION 18 – PREFERRED OPTIONS**

Chelmsford City Council has published its Regulation 18 Preferred Options consultation on the Review of its adopted Local Plan. This consultation is accompanied by a Preferred Options Integrated Impact Assessment.

The consultation runs for six weeks from **10am on Wednesday 8 June 2024 until 4pm on Wednesday 19 June 2024.**

#### **Regulation 18 Preferred Options Consultation Document**

This Regulation 18 Preferred Option consultation is the second formal stage in the preparation of the review of the adopted Chelmsford Local Plan, and a further opportunity for residents, businesses, developers, and other interested parties to get involved.

This is a full draft of the reviewed Local Plan. It includes updated and new policies and sets out proposed sites where new homes, employment and other facilities could be located. It also contains policies that we would use to decide planning applications.

#### **Regulation 18 Preferred Options Integrated Impact Assessment (IIA) Consultation Document**

The adopted Local Plan was developed alongside a comprehensive Sustainability Appraisal (SA) and Habitats Regulations Appraisal (HRA) process. For this review process, the Council is including other aspects of sustainable development in an Integrated Impact Assessment (IIA), which covers the following:

- Sustainability Appraisal
- Strategic Environmental Assessment
- Habitats Regulations Assessment
- Health Impact Assessment
- Equality Impact Assessment.

We are consulting on the Integrated Impact Assessment which assesses the Preferred Options against a range of social, environmental and economic indicators.

#### **Broomfield and Danbury Neighbourhood Plans Regulation 16 Consultations**

We are also consulting on two Neighbourhood Plans. These have been developed by Broomfield and Danbury Parish Councils, and cover a wide range of issues such as landscape, transport, recreation, heritage, building design, and business. When they are adopted, both Neighbourhood Plans will become part of the Local Plan and will be used for planning decision making.

Find out more at:

[www.chelmsford.gov.uk/broomfieldplan](http://www.chelmsford.gov.uk/broomfieldplan) and [www.chelmsford.gov.uk/danburyplan](http://www.chelmsford.gov.uk/danburyplan).

## **Where to view the documents and how to make representations:**

### **View and comment online**

You can view and comment on the consultation documents on the City Council's Consultation Portal at: [www.chelmsford.gov.uk/planningpolicyconsult](http://www.chelmsford.gov.uk/planningpolicyconsult). This is our preferred method to comment.

If you have not used this system before or have any difficulties logging in, please see our guidance notes at: [www.chelmsford.gov.uk/lp-portal-guide](http://www.chelmsford.gov.uk/lp-portal-guide) or call us on (01245) 606330.

### **View in person**

Paper copies can be viewed at the City Council Customer Service Centre, Civic Centre, Duke Street, Chelmsford, CM1 1JE Monday to Friday 10am to 4pm (Please note we are closed on bank holidays).

### **Comment via email**

Comments may be submitted by email: [planning.policy@chelmsford.gov.uk](mailto:planning.policy@chelmsford.gov.uk)  
Please include your name and postal address in your message.

A specially designed response form can be downloaded at [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review) or made available on request by telephoning (01245) 606330 or emailing [planning.policy@chelmsford.gov.uk](mailto:planning.policy@chelmsford.gov.uk).

### **Paper comments**

You can submit your comments by post or deliver them in person in the following ways:

**Post:** Spatial Planning Services, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE

**By hand:** Monday to Friday 10am to 4pm - Customer Service Centre, Civic Centre, Duke Street, Chelmsford, CM1 1JE (outside of these hours you can use the post box outside the Customer Service Centre).

If you do not have access to a computer, you can request paper copies. A charge will be made to cover printing and postage costs.

If you have difficulties making representations by e-mail or post due to a disability, please call us (01245) 606330.

### **How to find out more:**

We will be hosting an online virtual exhibition for the Local Plan Preferred Options Consultation as well as having in-person exhibitions at the Council Offices. Here you can view our exhibition boards which contain a summary of the consultation (please note both forms of exhibition will have the same information available).

**Local Plan Virtual exhibitions:** Will be available to view via [www.chelmsford.gov.uk/lp-exhibition](http://www.chelmsford.gov.uk/lp-exhibition)

**Local Plan in-person exhibition:** Drop in exhibitions will take place at the Civic Centre, where you will be able to speak to a representative of the Council. There is no booking required to attend these exhibitions, which will take place at the Chelmsford City Council Chamber, accessed via Customer Service Centre, Civic Centre, Duke Street, Chelmsford, CM1 1JE on the following dates and times:

- Thursday 16 May 2024, 6pm to 8pm
- Friday 17 May 2024, 1pm to 3pm
- Saturday 18 May 2024, 10am to 12noon
- Thursday 13 June 2024, 6pm to 8pm
- Friday 14 June 2024, 1pm to 3pm
- Saturday 15 June 2024, 10am to 12noon (*with British Sign Language interpreter available on this date*).

Further Local Plan exhibitions will be on display as follows. These will not be staffed.

- Monday 20 May to Friday 24 May, 7am to 6.30pm at High Chelmer Shopping Centre, 15a Exchange Way, Chelmsford, CM1 1XB
- Thursday 30 May, Friday 31 May, Monday 3 June to Friday 7 June, Monday 10 June and Tuesday 11 June, 9am to 4pm, South Woodham Town Council, Champions Manor Hall, Hullbridge Road, SWF.

**Local Plan Website:** Please visit our website [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review) for further information on the consultation and the Local Plan review process.

**Please note that any representations must be received by the Council no later than 4pm on Wednesday 19 June 2024. We are unable to accept anonymous representations and any comments received after the closing date cannot be accepted.**

The Council will acknowledge receipt of your comments and fully consider them, although we will not enter into individual correspondence.

All duly-made comments will be published on the Council's Consultation Portal in accordance with the General Data Protection Regulations.

Section 149 of the Equality Act 2010 requires that the Council should avoid any form of discrimination and also foster good relations between different ethnic groups. Comments which are deemed to be discriminatory will be inadmissible and will not be accepted.

Jeremy Potter  
Spatial Planning Services Manager

May 2024



# Welcome

## Thank you for visiting today

### What is the Local Plan

Our Local Plan shapes future growth and development of Chelmsford City Council's area. It sets out a positive vision, identifies where and how new development should take place in the future as well as areas and land uses that will be protected.

#### Why are we reviewing the adopted Chelmsford Local Plan?

We adopted our current Local Plan in May 2020, and good progress is being made with implementing it.

We need to review the plan at least every five years to make sure it remains up to date and meets the changing needs for development growth to 2041.

This consultation is called the Preferred Options. It is the second of three stages of consultation towards updating the adopted Local Plan and has been prepared following the Issues and Options public consultation in 2022. It is your opportunity to feed into the review process and help to shape the plan and the future of your area.

Government requirements mean that we must provide more homes but our aim is to get the right type of development in the right places to meet the growing needs of local people and businesses, while protecting our environment.

If the Local Plan becomes out of date, the Council could have very little influence over the location of new development and supporting infrastructure. Sites could be promoted for development in locations that the Council and its communities want to protect, and which are not considered sustainable.

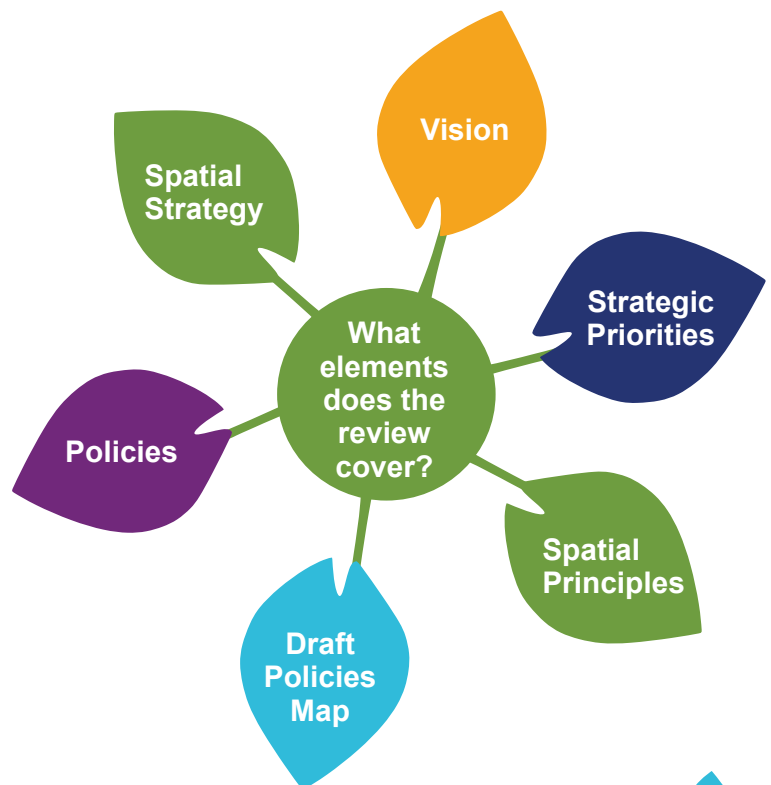
#### What is included in the consultation?

We want to make sure we cover the right issues and that all the suitable options for accommodating change are considered. The Preferred Options document is a full draft local plan, and includes the following key changes to the adopted Local Plan:

- Updated draft Strategic Priorities
- New draft Vision
- The amount of future development needed, including for homes and jobs
- Draft Spatial Strategy, including new site allocations, for accommodating this future development to 2041 and beyond
- Reviewed planning policies.

Many parts of the adopted Local Plan and its policies are still up to date and generally performing well, so they require no or only partial changes. Some changes and new policies are needed to reflect the latest national planning policy requirements, the Council's new ambitions and aspirations, and new development growth to 2041 and beyond.

The Local Plan is still evolving and no firm decisions have been made at this stage. However, we will not be reopening the debate on development sites which have already been allocated in the adopted Local Plan.





# Preferred Options – Background and Challenges

Chelmsford is already an attractive place, comprising the City of Chelmsford, the town of South Woodham Ferrers, numerous villages within attractive countryside and a rich and diverse natural and historic environment. The growth that has taken place, over past 25 years, has helped shape Chelmsford into the successful place it is now.

Vital new infrastructure has been delivered alongside new homes, jobs, shops and leisure opportunities. Chelmsford's economy shows strengths across many sectors, but especially finance, health and education.

Taking into account the projected population increase, we are determined to ensure that future growth continues to take place in a sustainable way. This will bring further improvements to the quality of life for residents and much needed new community and transport infrastructure whilst at the same time protecting and enhancing the natural and historic environment.

The Local Plan will be forward looking, shaping the sustainable planning of Chelmsford's development and infrastructure needs not just in the foreseeable future but also providing a longer-term framework.

## Previous consultation

We consulted on the first stage of reviewing the Local Plan, called the Issues and Options, from August to October 2022.

A total of 1,178 responses were received from 711 people or organisations, along with a petition. Responses came from a wide variety of groups and individuals including residents, developers, landowners and their agents, businesses and statutory bodies such as other Local Authorities and Parish/Town Councils.

We have published a document setting out a review of the consultation activity, a summary of the representations we received, and how these comments have been used to develop the Preferred Options document that we are consulting on now.

You can read this 'You said, We Did' feedback report on our website at [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review).

All the comments received can also be viewed on the Council's planning policy consultation portal at [www.chelmsford.gov.uk/planningpolicyconsult](http://www.chelmsford.gov.uk/planningpolicyconsult).

## Challenges

**Population** – is predicted to increase by 11.5% to 202,300 by 2041. Demographic changes will shape the type and size of accommodation necessary over the Local Plan period.

**Economy** – 12.5% growth in jobs is anticipated by 2041. Due to its location and high education standards, Chelmsford is expected to accommodate a major share of the forecast new employment growth. Significant additional land for employment is proposed through the Local Plan.

**Transport** – Chelmsford occupies a key place on the regional road and rail network. New development can generate additional service provision and transport investment, through direct provision of facilities and/or financial contributions from developers.

**Environment** – Chelmsford enjoys a high quality environment including recreational space, parks, gardens, nature reserves and the designated Green Wedge – and over 1,000 Listed Buildings. Development proposals need to balance the needs of development with the preservation and enhancement of natural and historic assets.

**Housing** – The Council has declared a housing crisis, with many individuals and families in temporary or unsuitable accommodation, an often expensive private rented sector, and an overall limited supply of affordable housing. The Local Plan can help to address this through housing allocations, setting an appropriate mix of homes, and working with housing partners.

**Climate change** – A climate and ecological emergency was declared in 2019 to tackle the consequences of climate change and reduce our impact on the planet. Closer to home, the Local Plan can set requirements for zero carbon development, boost active and sustainable travel, require expansion of natural habitats, and improve water efficiency and flood risk management.

**Communities** – health inequalities and wellbeing opportunities can be tackled through the Local Plan by providing the conditions for stronger and more-connected communities.



# What has been considered

The Spatial Strategy, setting out where new development should be located, takes the following as a starting point:



## Our Strategic Priorities

Our Strategic Priorities are the key priorities which set the overall policy direction for the Local Plan.

| Priorities for climate  | Priorities for growth   | Priorities for place  |
|---|---|---|
| 1. Addressing the Climate and Ecological Emergency  | 4. Ensuring sustainable patterns of development and protecting the Green Belt | 7. Creating well designed and attractive places, and promoting the health and social wellbeing of communities |
| 2. Promoting smart, active travel and sustainable transport   | 5. Meeting the needs for new homes  | 8. Delivering new and improved strategic and local infrastructure   |
| 3. Protecting and enhancing the natural and historic environment, and support an increase in biodiversity and ecological networks | 6. Fostering growth and investment and providing new jobs                     | 9. Encouraging resilience in retail, leisure, commercial and cultural development                             |

## The proposed updated Vision

Guiding Chelmsford's growth towards a greener, fairer and more connected community

The Local Plan Vision is a high-level guiding statement that sets out what is important for a place and how change will be managed in the future. It is a core part of a Local Plan and all the policies in the Plan will together deliver the Vision. We have reviewed the Local Plan Vision to reflect the new local priorities within the Council's Corporate Plan - Our Chelmsford, Our Plan. We have also considered other national and local priorities and Chelmsford's challenges and opportunities. It has also been simplified, shortened and purposefully aligned to the Corporate Plan, to make it easier to use.

## Spatial Principles

The Spatial Principles will ensure that the Local Plan focuses growth in the most sustainable locations.

- a) Locate development at well-connected and sustainable locations
- b) Protect the Green Belt from inappropriate development
- c) Promote the use of suitable previously developed land for development
- d) Continue the renewal and enhance the vitality of Chelmsford City Centre and its Urban Area
- e) Focus development at the higher order settlements outside the Green Belt and respect the development pattern and hierarchy of other settlements
- f) Respect the character and appearance of landscapes and the built environment, and preserve or enhance the historic and natural environment and biodiversity
- g) Locate development to avoid or manage flood risk and reduce carbon emissions
- h) Ensure development is served by necessary infrastructure and encourage innovation
- i) Locate development to utilise existing and planned infrastructure effectively
- j) Ensure development is deliverable.

## Settlement Hierarchy

Another factor for developing the Spatial Strategy and choosing areas for growth is the Settlement Hierarchy, which ranks towns and villages according to their size, function, characteristics and sustainability.





# How much growth are we planning for?

The adopted Local Plan has allocated sites for development which are now coming forward, with Masterplans being approved and planning applications decided or in progress.

We need to work out how many more houses to plan for until 2041 using a formula set by the Government, called the standard method.

|  |                     |
|--|---------------------|
| <b>Housing requirement for Plan period</b> | <b>22,567 homes</b> |
| Completions 2022-23                        | 822                 |
| Adopted Local Plan allocations             | 12,677              |
| Sites with planning permission             | 3,745               |
| Windfall allowance (2026-2041)             | 1,461               |
| <b>New allocations needed</b>              | <b>3,862</b>        |

The Local Plan also plans to meet future employment needs by providing additional employment allocations.

|   |                    |
|---|--------------------|
| <b>Employment requirement for Plan period</b> | <b>162,646 sqm</b> |
| Adopted Local Plan allocations                | 55,000 sqm         |
| <b>New allocations needed</b>                 | <b>107,646 sqm</b> |

New housing development, in particular, will be required to provide supporting infrastructure, services and facilities including for:

- Transport improvements including the New Beaulieu Park Rail Station, Chelmsford North East Bypass, Army and Navy junction improvements, and sustainable travel routes
- Community buildings, schools, healthcare, wellbeing measures, sports and cultural facilities
- Green infrastructure including new Country Parks, open space, green/blue networks, biodiversity and public realm improvements
- Preservation and enhancement of historic assets
- Flood risk management and utility infrastructure

New development allocations will be focused on three growth areas of Central and Urban Chelmsford, North Chelmsford and South and East Chelmsford. This distribution of growth is shown on the Key Diagram.



## Discounted locations for development

Areas have been discounted as follows:

- The Green Belt, a national designation to prevent encroachment of urban growth into undeveloped areas. This covers almost 34% of the land in the south and west of Chelmsford, shaded in green on the Key Diagram
- The Green Wedge, a key local landscape designation of a green network which prevents urban sprawl and provides for wildlife and nature conservation, flood storage and active travel routes. This covers the river valleys where they pass into Chelmsford's urban area, shaded in hatched green on the Key Diagram
- Areas with known severe constraints/capacities including highways and education
- Areas where no land was being promoted through the Call for Sites exercise
- Areas which did not appear in the Issues and Options consultation document (for housing development).

# Growth Area 1 – Central and Urban Chelmsford

Development in this area will deliver a number of benefits including green infrastructure and city greening, enhanced bus services, and opportunities to maximise walking and cycling into the City Centre. Previously developed land in the City Centre will be used to strengthen and expand the City as a major residential and employment centre.

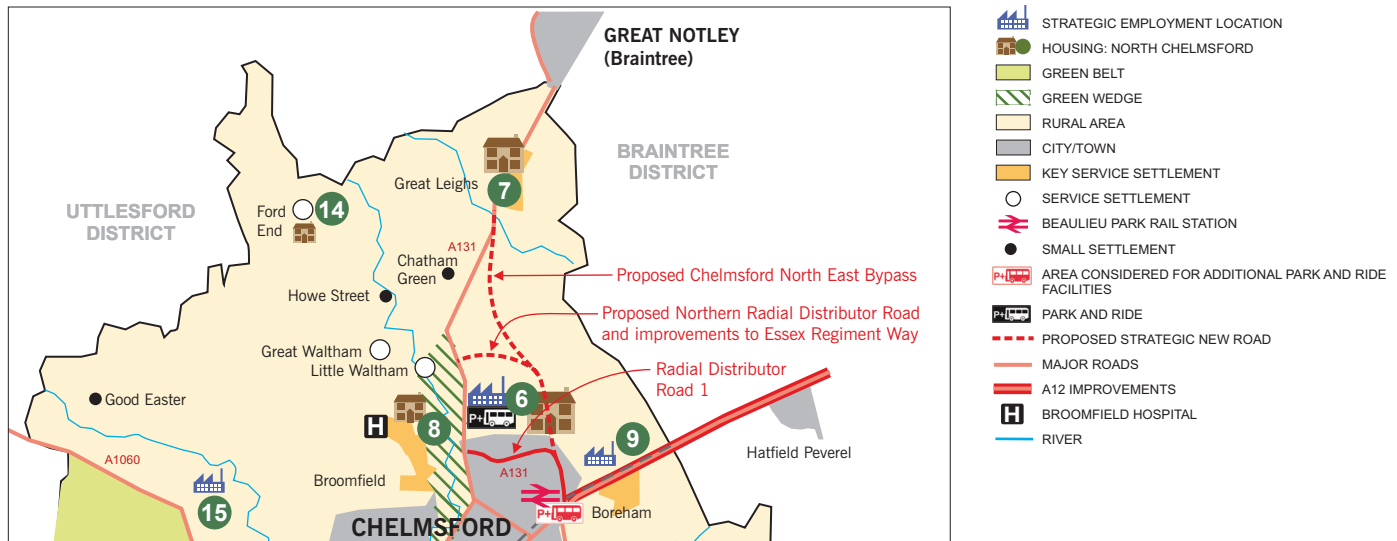


| Growth Area 1 – Central and Urban Chelmsford  |  |                               |
|---|--|-------------------------------|
| Development Allocations   | Total Homes                            | Employment Floorspace         |
| 1 Previously developed sites in Chelmsford Urban Area<br><b>New sites:</b><br>Meadows Shopping Centre/Surface Car Park<br>Former Kay Metzeler, Brook Street<br>Land between Hoffmanns Way and Brook Street<br>Granary Car Park, Victoria Road<br>Coval Lane Car Park<br>Glebe Road Car Park | 2,765                                  | 4,000sqm Use Class E(g)(i-ii) |
| 2 West Chelmsford   | 880 plus 5 Travelling Showpeople Plots |                               |
| 3a East of Chelmsford - Manor Farm  | 360                                    |                               |
| 3b East of Chelmsford - Land North of Maldon Road   |  | 5,000sqm Office/Business Park |
| 3c East of Chelmsford - Land South of Maldon Road   | 109                                    |                               |
| 3d East of Chelmsford - Land North of Maldon Road   | 65                                     |                               |
| 4 Land North of Galleywood Reservoir  | 24                                     |                               |
| 5 Land surrounding Telephone Exchange, Ongar Road, Writtle  | 25                                     |                               |
| <b>Area Total</b>   | <b>4,228</b>                           | <b>9,000sqm</b>               |

| New supporting infrastructure in Growth Area 1   |
|--|
| Primary school   |
| Four early years and childcare nurseries   |
| Two new special schools  |
| Country park   |
| Access to Sandford Mill and a visitor centre   |
| Financial contributions to provision of education, community facilities, healthcare, sports and recreation facilities, sustainable transport, local mobility hub and road network enhancements |

# Growth Area 2 – North Chelmsford

Development in this area will deliver a substantial number of new homes and employment over the Local Plan period, underpinned by a comprehensive package of new infrastructure including new schools, early years and childcare provision, green infrastructure and neighbourhood centres. Significant growth is proposed to Chelmsford Garden Community, along with extensions to two employment sites, and two small village allocations.

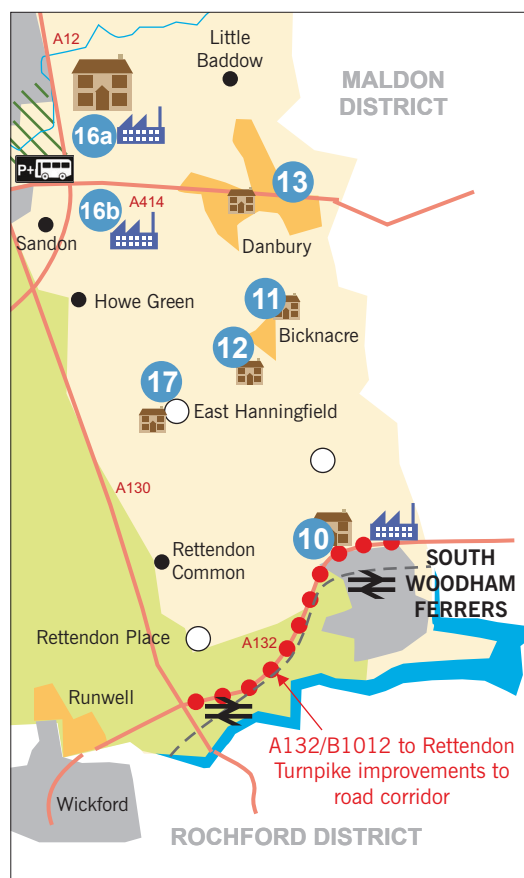
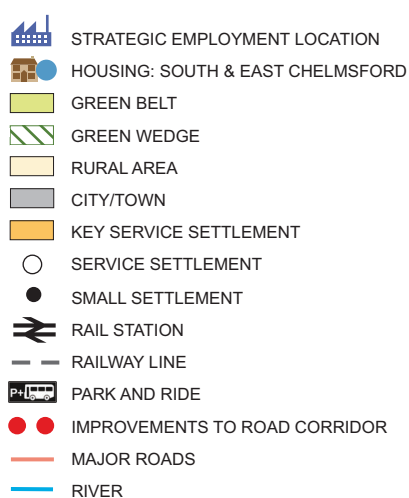


| Growth Area 2 – North Chelmsford                              |   |                                |
|---|---|--------------------------------|
| Development Allocations                                       | Total Homes   | New Employment Floorspace      |
| 6 North East Chelmsford (Chelmsford Garden Community)         | 6,250, plus 10 Traveller Pitches and 10 Travelling Showpeople Plots | 56,946sqm Office/Business Park |
| 7a Great Leighs - Land at Moulsham Hall                       | 750, plus 5 Travelling Showpeople Plots                             |                                |
| 7b Great Leighs - Land East of London Road                    | 190   |                                |
| 7c Great Leighs - Land North and South of Banters Lane        | 100   |                                |
| 8 North of Broomfield   | 512   |                                |
| 9a New Site: Waltham Road Employment Area                     |   | 3,500sqm B2/B8                 |
| 14a New Site: Land west of Back Lane, Ford End                | 20  |                                |
| 14b New Site: Land south of Ford End Primary School, Ford End | 20  |                                |
| 15 New Site: Little Boyton Hall Farm Rural Employment Area    |   | 6,000sqm B2/B8                 |
| <b>Area Total</b>   | <b>7,842</b>  | <b>66,446sqm</b>               |

| New supporting infrastructure in Growth Area 2   |
|--|
| Transport including Phase 1 of Chelmsford North East Bypass, Northern Radial Distributor Road, bus infrastructure  |
| Six village/neighbourhood centres  |
| Secondary school   |
| Five primary schools   |
| Seven early years and childcare nurseries  |
| Country park   |
| Financial contributions to Beaulieu Park Railway Station, provision of education and community facilities, healthcare, sports and recreation facilities, sustainable transport and road network enhancements |

# Growth Area 3 – South and East Chelmsford

Proposals include a high quality and comprehensively planned new Garden Community to the East of Chelmsford at Hammonds Farm, with a wide range of supporting uses. Also proposed is a strategic employment site, along with four smaller village allocations to contribute towards supporting existing village facilities and services.



| Growth Area 3 – South and East Chelmsford                      |   |                           |
|--|---|---------------------------|
| Development Allocations  | Total Homes   | New Employment Floorspace |
| 16a New Site: East Chelmsford Garden Community (Hammonds Farm) | 3,000 (plus 1,500 homes post 2041), plus 20 Traveller Pitches | 43,000sqm Business Space  |
| 16b New Site: Land adjacent to A12 Junction 18                 |   | 43,000sqm Business Space  |
| 10 North of South Woodham Ferrers                              | 1,220, plus 5 Travelling Showpeople Plots                     | 1,200sqm Business Space   |
| 11a South of Bicknacre   | 42  |                           |
| 11b New Site: Land at Kingsgate, Bicknacre                     | 20  |                           |
| 11c New Site: Land west of Barbrook Way, Bicknacre             | 20  |                           |
| 12 St Giles, Bicknacre   | 32  |                           |
| 13 Danbury   | 100   |                           |
| 17a New Site: Land north of Abbey Fields, East Hanningfield    | 15  |                           |
| 17b New Site: Land east of Highfields Mead, East Hanningfield  | 20  |                           |
| <b>Area Total</b>  | <b>4,469</b>  | <b>87,200sqm</b>          |

| New supporting infrastructure in Growth Area 3  |
|---|
| Secondary school, up to four primary schools and eight early years and childcare nurseries  |
| Neighbourhood centres   |
| Transport including Bus Based Rapid Transit infrastructure, safe multi-user access routes, and capacity improvements to A132  |
| Country park  |
| Financial contributions to provision of education and community facilities, healthcare, sports and recreation facilities, sustainable transport and road network enhancements |





# New Proposed Garden Community

## 16a – East Chelmsford Garden Community (Hammonds Farm)

We are proposing to allocate land for a new East Chelmsford Garden Community. This is centred on Hammonds Farm, to the east of the A12 and north of the A414 Maldon Road.

|   |   |
|---|---|
| <b>New homes including affordable</b>   | 3,000 (plus 1,500 homes post 2041), and 20 Traveller Pitches  |
| <b>New employment floorspace</b>        | 43,000sqm   |
| <b>Supporting infrastructure</b>        | Country Park and significant new multi-functional green infrastructure and landscape  |
|   | Mixed use centres for food and other shopping, community uses, healthcare provision   |
|   | All through school, potential sixth form centre, three primary schools, six early years and childcare nurseries   |
|   | New access junction from A414 (shared with 16b); pedestrian and cycle connections; mobility hubs and bus transport; safe pedestrian/cycle access routes under and over the A12, including to Park and Ride site, and Beaulieu Park Rail Station |
| <b>Historic and natural environment</b> | Preserve the Conservation Areas and listed buildings  |
|   | Protect and retain the protected lanes and reinstate historic landscape features  |
|   | Conserve Local Wildlife Sites, Nature Reserves, ancient woodlands and SSSI  |
|   | Provide sustainable drainage and flood risk management  |
|   | Provide a minimum of 20% biodiversity net gain  |

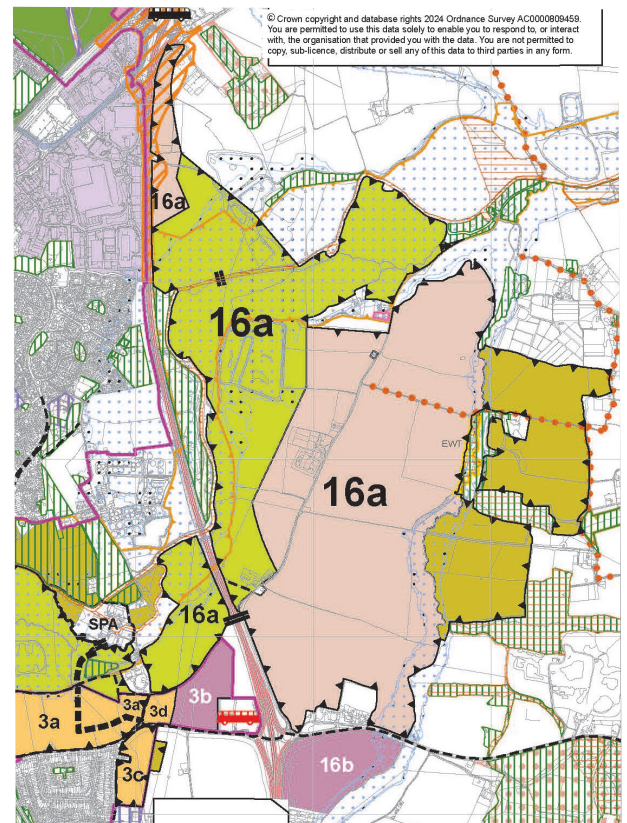
High quality garden community development will be provided through Garden City Principles. These include:

- community and stakeholder involvement in design and delivery with long-term governance and stewardship arrangements
- meeting the housing needs of all local people
- providing integrated and sustainable transport systems

## 16b – Land adjacent to A12 Junction 18 – Employment Area

We are also proposing to allocate a separate area of land for new employment uses adjacent to Junction 8 of the A12, south of the A414.

|   |  |
|---|--|
| <b>New employment floorspace</b>        | 43,000sqm for mixed employment types   |
| <b>Supporting infrastructure</b>        | New access junction from A414 (shared with 16a) plus multi-user crossings                                      |
|   | Safe pedestrian/cycle access connections including to Park and Ride site, Hammonds Farm, bus stops and Danbury |
| <b>Historic and natural environment</b> | Preserve Danbury Conservation Area   |
|   | Retain boundary trees, plant new trees and extensive landscape buffers   |

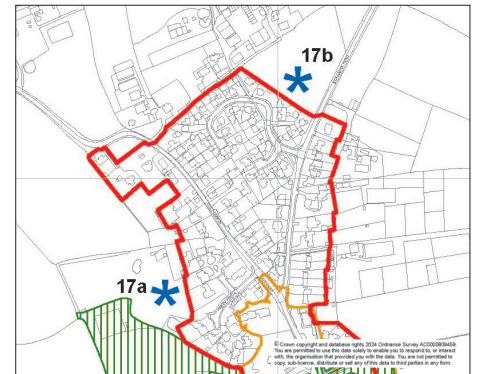
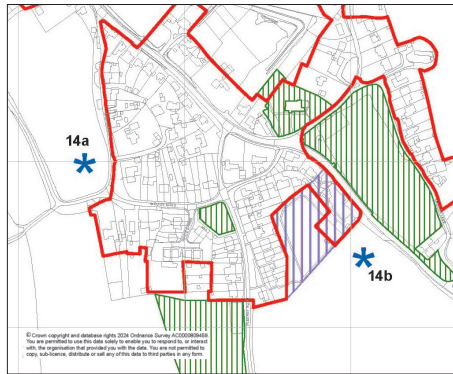
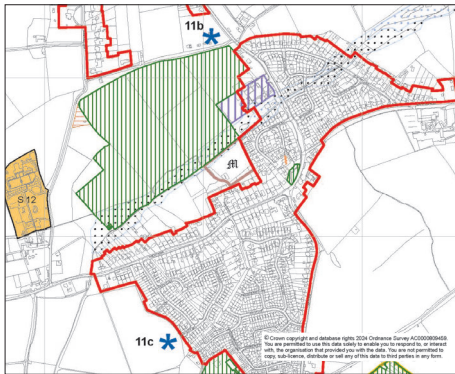




# Proposals for Villages

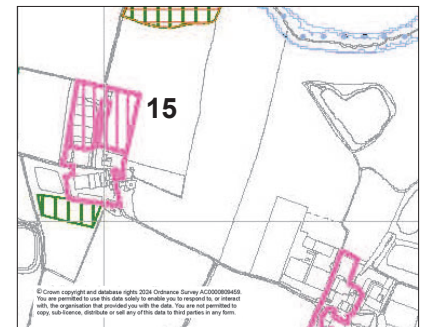
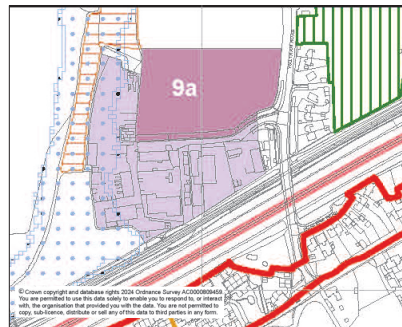
Limited development is proposed in some villages including Bicknacre, Ford End, East Hanningfield, Boreham and Boyton Cross.

We aim to address the Government's requirement to allocate some smaller sites which can be built earlier in the Local Plan period and give smaller development companies the opportunity to build locally. Bicknacre, Ford End and East Hanningfield have primary schools and community facilities, making them suitable for small scale development, which will include affordable homes.



| Village           | Site                                      | Proposal        |
|-------------------|---|-----------------|
| Bicknacre         | 11b Land at Kingsgate, Bicknacre Road     | Around 20 homes |
|                   | 11c Land West of Barbrook Way             | Around 20 homes |
| Ford End          | 14a Land West of Back Lane                | Around 20 homes |
|                   | 14b Land South of Ford End Primary School | Around 20 homes |
| East Hanningfield | 17a Land North of Abbey Fields            | Around 15 homes |
|                   | 17b Land East of Highfields Mead          | Around 20 homes |

We also propose to expand two employment sites at Little Boyton Hall Farm, Boyton Cross and Waltham Road, Boreham. Expansion of these well-established employment sites will provide rural employment opportunities and support the sustainable growth and expansion of business in rural areas.



| Site   | Proposal  |
|--|---|
| 9a Waltham Road Employment Area, Boreham                       | 3,500sqm B2/B8 use (general industrial, and storage and distribution) |
| 15 Little Boyton Hall Farm Rural Employment Area, Boyton Cross | 6,000sqm B2/B8 use (general industrial, and storage and distribution) |



# What else is in the Local Plan?

We use the Local Plan policies to deliver the Strategic Priorities (what we want to achieve overall) and the Spatial Strategy (locations for growth). The different types of policies are set out below.

|  |  |
|--|--|
| <b>Strategic Policies</b>              | High level policies including for climate change, social inclusion, the natural environment, infrastructure, and housing requirements        |
| <b>NEW</b>                             | Proposed new Strategic Policies: Health and Wellbeing, Creating Successful Places, Connectivity and Travel, Future of Chelmsford City Centre |
| <b>Site Policies</b>                   | Covering the amount of development, design guidance, and infrastructure that must be provided  |
| <b>Development Management Policies</b> | All planning applications are considered against these policies to make sure they provide what is needed and protect what is important       |
| <b>NEW</b>                             | Proposed new Development Management Policy: Net Zero Carbon Development (In Operation)   |
| <b>Special Policy Areas</b>            | For Broomfield Hospital, Chelmsford City Racecourse, Hanningfield Reservoir, RHS Hyde Hall Gardens, Sandford Mill, ARU Writtle               |
| <b>Development Standards</b>           | For all new residential development including privacy, open space, and recycling and waste guidance  |
| <b>Policies Map</b>                    | All the proposals shown on a map   |

## Other consultations: Integrated Impact Assessment (IIA)

The Local Plan is subject to an ongoing process of assessing its proposals against a sustainability framework. This covers the potential environmental, social, economic and health performance of the Local Plan and any reasonable alternative approaches.

## Other consultations: Neighbourhood Plans

Neighbourhood Plans have been developed by Broomfield and Danbury Parish Councils, and cover a wide range of issues such as landscape, transport, recreation, heritage, building design, and business. When they are adopted, both Neighbourhood Plans will become part of the Local Plan and will be used for planning decision making.

Both Neighbourhood Plans are proposing to allocate land for development as follows:

|            |   |
|------------|---|
| Broomfield | Community-led housing at Saxon Way with open space and a potential GP surgery<br>A community facility for non-residential day facilities and local/informal green space at Broomfield Place<br>You can find out more at: <a href="http://www.chelmsford.gov.uk/broomfieldplan">www.chelmsford.gov.uk/broomfieldplan</a>                           |
| Danbury    | Around 93 homes across five sites at<br>Sandpit Field (around 10 homes)<br>Tyndales Farm West (around 65 homes)<br>South of Jubilee Rise (around 2 homes)<br>Woodhill Road (around 14 homes)<br>Mayes Lane (around 2 homes)<br>You can find out more at: <a href="http://www.chelmsford.gov.uk/danburyplan">www.chelmsford.gov.uk/danburyplan</a> |





# Have your say

## Find out more

View the consultation documents on:

- our specially designed consultation portal [www.chelmsford.gov.uk/planningpolicyconsult](http://www.chelmsford.gov.uk/planningpolicyconsult)
- on our website [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review)

The consultation documents are:

- Preferred Options Consultation Document 2024
- Integrated Impact Assessment (IIA) of the Review of the Adopted Local Plan: Preferred Options 2024

## Visit one of our exhibitions

|   |   |               |
|---|---|---------------|
| Thursday 16 May   | Council Chamber, Civic Centre   | 6pm – 8pm     |
| Friday 17 May   | Council Chamber, Civic Centre   | 1pm – 3pm     |
| Saturday 18 May   | Council Chamber, Civic Centre   | 10am – 12noon |
| Monday 20 May to Friday 24 May  | High Chelmer Shopping Centre (unstaffed)  | 7am – 6.30pm  |
| Thursday 30 May Friday 31 May<br>Monday 3 June to Friday 7 June<br>Monday 10 June Tuesday 11 June | South Woodham Town Council, Champions Manor Hall,<br>Hullbridge Road, SWF (unstaffed) | 9am – 4pm     |
| Thursday 13 June  | Council Chamber, Civic Centre   | 6pm – 8pm     |
| Friday 14 June  | Council Chamber, Civic Centre   | 1pm – 3pm     |
| Saturday 15 June *  | Council Chamber, Civic Centre   | 10am – 12noon |

\* with British Sign Language interpreter available

## How to comment

Making your comments through the consultation portal allows you to download the consultation documents and sign up for alerts to future consultation events.

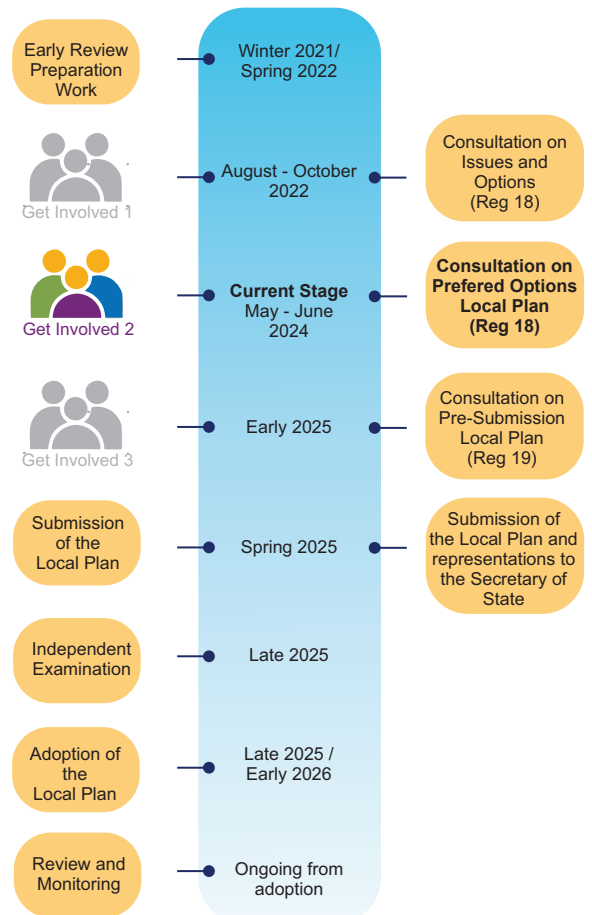
You can also make comments:

By email to [planning.policy@chelmsford.gov.uk](mailto:planning.policy@chelmsford.gov.uk)  
By post to Spatial Planning Services, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE.

**The consultation on the Preferred Options documents runs for six weeks from 10am on Wednesday 8 May to 4pm on Wednesday 19 June 2024.**

## What happens next

We will consider all the comments received alongside further studies, the findings of the IIA and national planning policy to finalise the Pre-Submission Local Plan, for public consultation in early 2025.



Pop-Up Stand



# Review of Chelmsford Local Plan

Chelmsford City Council is reviewing its adopted Local Plan. This will set out where new development will take place up to 2041.



Find out more at  
[www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review)  
Get involved by registering at  
[www.chelmsford.gov.uk/planningpolicyconsult](http://www.chelmsford.gov.uk/planningpolicyconsult)

Chelmsford  
Local Plan 

## Pop-Up Stand on Site

Pop up banners and leaflets displayed at the following venues during the PO consultation period May-June 2024.



Riverside Leisure Centre



Chelmsford Sports & Athletics Centre



SWF Leisure Centre



Chelmsford Museum

Click on the link, or copy and paste into your browser, to view the consultation materials.

**Local Plan Video:** <https://youtu.be/ZGpTRMhDIhw>



### Chelmsford's Local Plan - have your say



Chelmsford Council  
506 subscribers

Subscribe

7



Share

Save



**Local Plan Virtual Exhibition:** <https://chelmsford-2024.vercel.app/>



### Chelmsford Local Plan Review

Chelmsford City Council is consulting on a review of its adopted Local Plan with the Preferred Options consultation running from **8 May 2024 to 19 June 2024**.

View our exhibition to find out more. There are also links to the main consultation material.

This is the second of three stages of consultation towards updating the adopted Local Plan, and has been prepared following initial consultation in 2022. We want to make sure we cover the right issues and that all the suitable options for accommodating change are considered. This is your opportunity to feed into the review process and help to shape the plan and the future of your area.

## Review of the Chelmsford Local Plan - Get involved now!

We are reviewing our Local Plan which sets out how much new development is needed and identifies land for housing, schools, shops and jobs as well as areas for protection, such as open space and sites important for wildlife.

The Council's Local Plan was adopted in 2020. We need to review the plan at least every five years to ensure that it remains up to date and continues to meet our needs for development growth to 2041 and beyond.

We undertook the first stage of consultation in 2022 and have carefully considered all the responses alongside updated evidence, national planning policy, new local priorities, and monitoring data to progress the Preferred Options stage.

The Preferred Options document is a full draft Local Plan and includes:

- updated and new Strategic Priorities.
- proposed new sites where new homes, jobs and other facilities could be located.
- new and updated policies that the Council would use to decide planning applications.

We are consulting on the Preferred Options Local Plan from 10am on Wednesday 8 May 2024 until 4pm on Wednesday 19 June 2024. We are inviting comments on the plan so residents can influence it and ensure that it is fit for purpose to meet local needs. We are not reopening any debates about already adopted allocated sites.

For more information go to [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review)

### Why should I get involved?

I want to make sure Chelmsford has the best services and facilities

I want a say over how to improve my local area

I want a say over where new homes will be built

I want a say on local planning policies

I want to influence decision-making in my area

I want to make sure Chelmsford continues to be a place where I enjoy living and working



# City Life Articles

**Chelmsford City Life** Home News What's on Community

# Top topics culture outdoors green spaces

News Community

## Next stage of public consultation on Chelmsford's Local Plan set to start in May

By **Charlotte Maltby**  
6 March 2024 [planning](#) [local plan](#)



The city council is reviewing its Local Plan to guide sustainable growth to 2041.

**Chelmsford City Life** Home News What's on

# Top topics culture outdoors green spaces

News

## Planning talking points: calming the waters

By **Corporate Communications**  
9 May 2024 [local plan](#) [planning](#) [sustainability](#) [consultation](#)



**Chelmsford City Life** Home News What's on

# Top topics culture outdoors green spaces

News

## Planning talking points: planning beyond homes — the big picture

By **Corporate Communications**  
22 May 2024 [planning](#) [local plan](#)



What image does 'planning' conjure up for you? Most people think of homes: houses, flats and maisonettes being built for the growing population. You might think about the [national housing crisis](#) and how difficult it is to afford a home in the UK right now, or about [where is and isn't appropriate for new homes to go](#).

However, planning isn't all about homes. The [Local Plan](#), which guides where and what

**Chelmsford City Life** Home News What's on

# Top topics culture outdoors green spaces

News

## Your opportunity to shape Chelmsford's future growth

By **Corporate Communications**  
8 May 2024 [planning](#) [local plan](#) [city](#) [consultation](#)



## How do you want Chelmsford to look in twenty years' time?

**Chelmsford City Life** Home News What's on

# Top topics culture outdoors green spaces

News

## Planning talking points: can our homes be good for nature?

By **Corporate Communications**  
17 May 2024 [sustainable growth](#) [biodiversity](#) [local plan](#)



Beavers are often celebrated by ecologists as 'nature's engineers'. When they build dams,

**Chelmsford City Life** Home News What's on

# Top topics culture outdoors green spaces

News

## Planning talking points: how a city is shaped

By **Corporate Communications**  
22 May 2024 [planning](#) [local plan](#)



How Half Moon Square in Chelmsford city centre looks in current day

Have you ever walked through your town or village and wondered how it came to be what it is today? Why the village hall, the church, the shops and houses are laid out in the way they are?

FOCUS
Letters Page

## Over to You

SAVE MALDON'S MEDICAL SERVICES-  
REF. ST PETER'S HOSPITAL

In a recent meeting held on 19th March, the South Woodham Ferrers Health and Social Care Groups presented concerning evidence to the NHS ICB regarding the potential closure of St Peter's Hospital. We are deeply troubled by the implications of these views which were expressed for our community's access to essential healthcare services. These views are not widely held by others in the Maldon District and believe South Woodham Ferrers would support the retention of St Peter's Hospital Services.

Save Maldon's Medical Services, a grassroots organization dedicated to preserving healthcare access in the whole Maldon District, is spearheading efforts to prevent the closure of St Peter's Hospital Services until a viable alternative, such as a new NHS Community Hospital in Maldon, can be provided.

It is paramount that we rally support from every household in South Woodham Ferrers to ensure that our voices are heard. Dispersing outpatient services across different locations such as Banks or other commercial buildings which might be available, potentially even outside the Maldon District, would be detrimental to the health and wellbeing of our community.

I urge you to amplify our message and raise awareness about this crucial issue. By shining a spotlight on the efforts of Save Maldon's Medical Services and the concerns of South Woodham Ferrers residents, we can work together to safeguard the future of St Peter's Hospital Services. Please write to your Member of Parliament explaining your concerns that services must be maintained in St Peter's for the foreseeable future and/or until a cohesive plan for locating these services is delivered.

Many residents have made their feelings known and we thank them, and Mayor Donna Eley, for their continued support. You can follow Save Maldon's Medical Services on Facebook where we have our 3000 people already involved.

**Steve Rogers**  
On behalf of SMMS

REVIEW - PREFERRED OPTIONS CONSULTATION

Chelmsford Local Plan

Chelmsford City Council is consulting on a review of its adopted Local Plan with the Preferred Options consultation running from 8 May 2024 to 19 June 2024.

This is the second of three stages of consultation towards updating the adopted Local Plan, and has been prepared following initial consultation in 2022. The City Council wants to make sure the Plan covers the right issues and that all the suitable options for accommodating change are considered. The consultation is your opportunity to feed into the review process and help to shape the plan and the future of our area.

Chelmsford City Council adopted the current Local Plan in May 2020. It needs to review the plan at least every five years, to make sure it remains up to date and meets the changing needs for development to 2041. The review considers new national policy and changing local people.

The Preferred Options Local Plan is a full draft Local Plan. It includes updated and new Strategic Priorities, site allocations for new homes and employment, and policies that will be used to decide planning applications.

**What is proposed in South Woodham Ferrers?**  
The Preferred Options Local Plan carries forward the allocation of Land North of South Woodham Ferrers from the adopted Local Plan, called Strategic Growth Site 10. This is identified for 1,220 new homes, around 1,200sqm of business floorspace and a Travelling Showpeople site alongside supporting infrastructure including a new Neighbourhood Centre and early years and childcare nurseries. No other sites are proposed for allocation in South Woodham Ferrers.

Chelmsford City Council is inviting comments on the Preferred Options Local Plan to ensure that it is fit for purpose to meets local needs. It is not reopening any debates about the principle of already adopted allocated sites. The Council is also consulting on an Integrated Impact Assessment which assesses the impacts of the Preferred Options Local Plan in terms of key sustainability issues.

**How can I get involved?**  
You can view and comment on the consultation documents during the consultation period on our specially designed consultation portal [www.chelmsford.gov.uk/planningpolicyconsult](http://www.chelmsford.gov.uk/planningpolicyconsult)

Alternatively visit our Local Plan web page for details of the consultation, how to make your comments, and about our planned in-person exhibitions at [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review)

Chelmsford Local Plan Review – Preferred Options Consultation

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This is the second of three stages of consultation towards updating the adopted Local Plan, and has been prepared following initial consultation in 2022. The City Council wants to make sure the Plan covers the right issues and that all the suitable options for accommodating change are considered. The consultation is your opportunity to feed into the review process and help to shape the plan and the future of our area.

Chelmsford City Council adopted the current Local Plan in May 2020. It needs to review the plan at least every five years, to make sure it remains up to date and meets the changing needs for development to 2041. The review considers new national policy and changing local circumstances. The aim is to get the right type of development in the right places to meet the growing needs of local people and businesses, while protecting our environment.

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**01245 324473**

Sonia Barker  
Counsellor & Hypnotherapist

Tel: 07983 439199

*Why suffer in silence?  
If depression, anxiety, a relationship issue, your weight or a phobia are having a negative impact on your life, take a look at my website to see how I may be able to help you!*

soniabarkertherapy@gmail.com    www.soniabarkertherapy.co.uk  
Based in South Woodham Ferrers, Chelmsford

Why suffer in silence

Hello, my name is Sonia & I'm a Counsellor & Hypnotherapist. My business is home based in South Woodham Ferrers.

Counselling can be used to treat a range of issues including depression, anxiety, grief, relationship issues, trauma & addiction. I offer clients a safe & confidential space in order to explore their presenting issue/s, helping them to identify possible root causes too. I also share coping strategies & small lifestyle changes that can help manage symptoms.

In my experience Hypnotherapy can also be beneficial to help manage depression & anxiety, making a direct change to the subconscious mind where all events, experiences & emotions are stored. I also offer hypnosis for weight loss.

The Preferred Options Local Plan includes a new home decision plan. What is proposed in the Preferred Options Local Plan North of South Woodham Ferrers?

## Local Plan Poster



### Review of Chelmsford Local Plan – Get Involved Now!

We are reviewing our Local Plan which sets out how much new development is needed and identifies land for housing, schools, shops and jobs as well as areas for protection, such as open space and sites important for wildlife.

The Council's Local Plan was adopted in 2020. We need to review the plan at least every five years to ensure that it remains up to date and continues to meet our needs for development growth to 2041 and beyond.

We undertook the first stage of consultation in 2022 and have carefully considered all the responses alongside updated evidence, national planning policy, new local priorities, and monitoring data to progress the Preferred Options stage. The Preferred Options document is a full draft local plan and includes:

- 📌 updated and new Strategic Priorities
- 📌 proposed new sites where new homes, jobs and other facilities could be located
- 📌 new and updated policies that the Council would use to decide planning applications



### Have Your Say!

**The Consultation runs from 10am on Wednesday 8 May 2024 until 4pm on Wednesday 19 June 2024.**

Read and comment on the documents at [www.chelmsford.gov.uk/planningpolicyconsult](http://www.chelmsford.gov.uk/planningpolicyconsult). They will also be available to read during normal opening hours at the Council's Customer Service Centre in Chelmsford.

There will be an online exhibition and we will also be holding in-person exhibitions at the Civic Centre. These exhibitions will provide an opportunity for you to find out more and discuss the consultation with a Planning Officer. More information can be found at: [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review)

#### Visit an exhibition:

|                         |              |             |
|-------------------------|--------------|-------------|
| Thursday 16th May 2024  | Civic Centre | 6pm - 8pm   |
| Friday 17th May 2024    | Civic Centre | 1pm - 3pm   |
| Saturday 18th May 2024  | Civic Centre | 10am - 12pm |
| Thursday 13th June 2024 | Civic Centre | 6pm - 8pm   |
| Friday 14th June 2024   | Civic Centre | 1pm - 3pm   |
| Saturday 15th June 2024 | Civic Centre | 10am - 12pm |

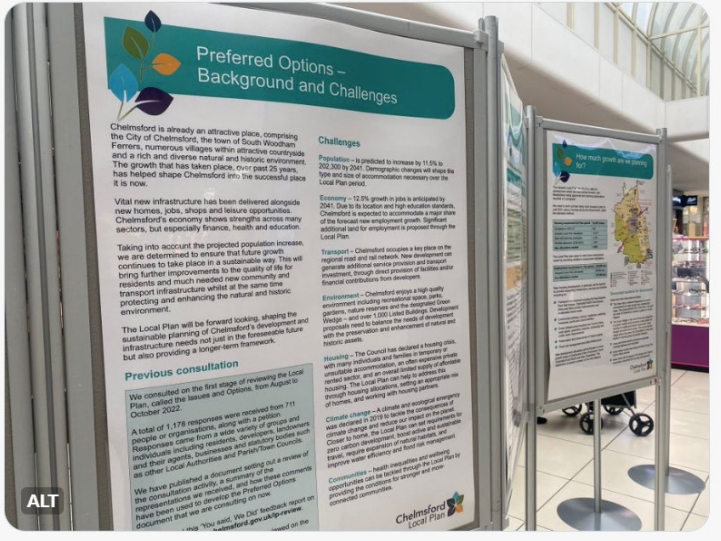
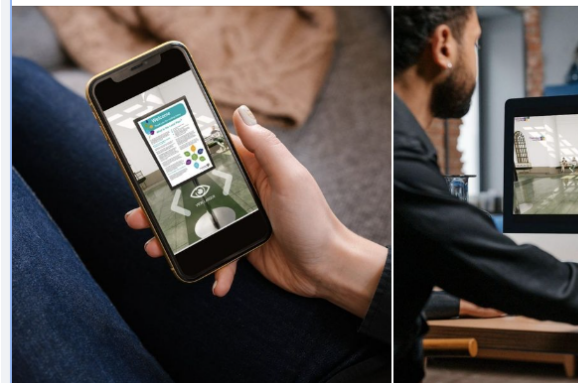
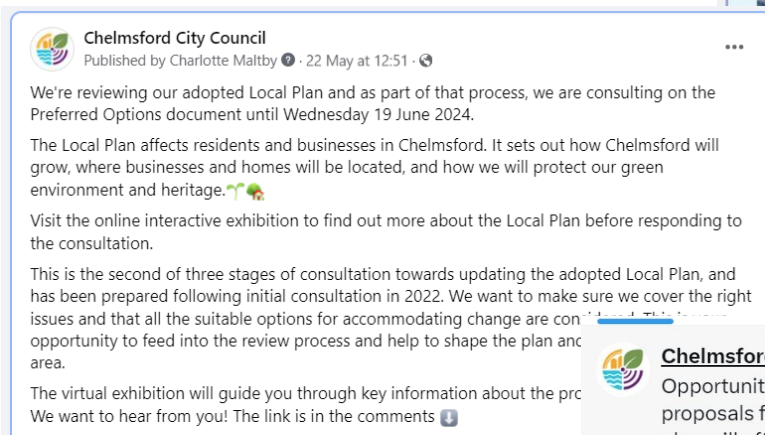
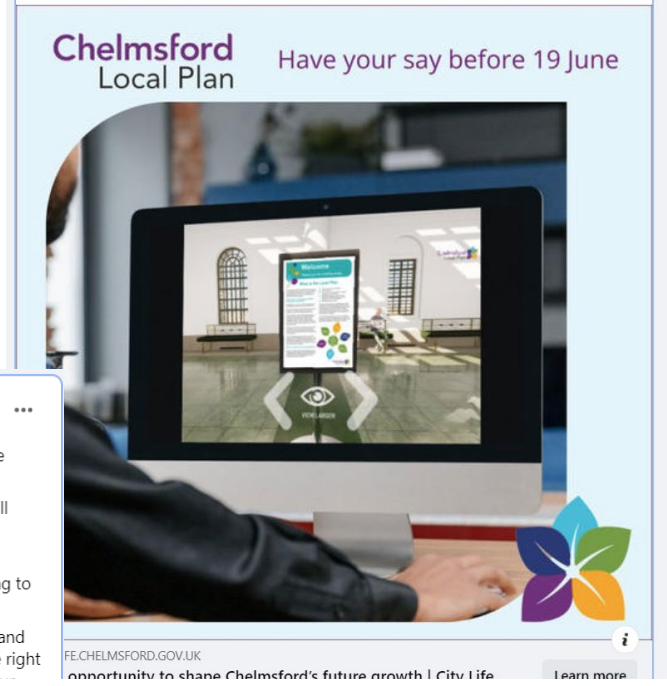
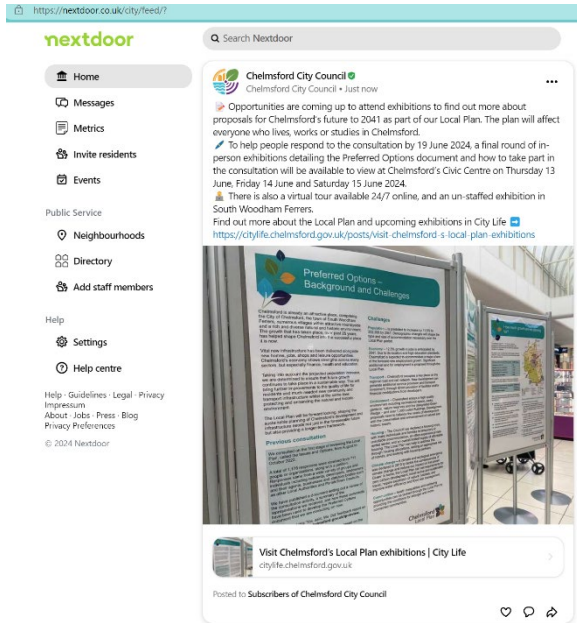
A British Sign Language interpreter will be available for the exhibition on 15 June

Find out more at [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review), telephone (01245) 606330 or email [planning.policy@chelmsford.gov.uk](mailto:planning.policy@chelmsford.gov.uk)





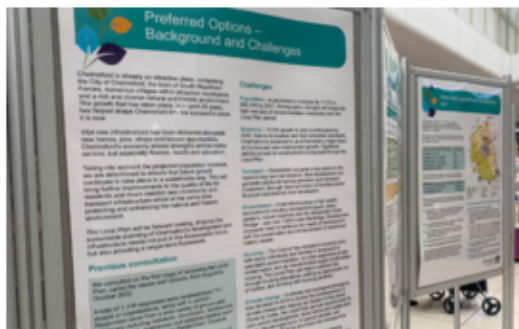
# Examples of Social Media Posts



## GovDelivery Mailshot (24<sup>th</sup> May, 31<sup>st</sup> May and 7<sup>th</sup> June 2024)

### Visit a virtual exhibition of the Local Plan review

A consultation on Chelmsford's Local Plan is running until **19 June** and there's still plenty of time to take a look at our virtual exhibition. The Local Plan will shape how the district develops over the **next 20 years** and will affect every resident of Chelmsford. Find out more about the proposals and how to have your say.



[Read more](#)

### Local Plan virtual exhibition

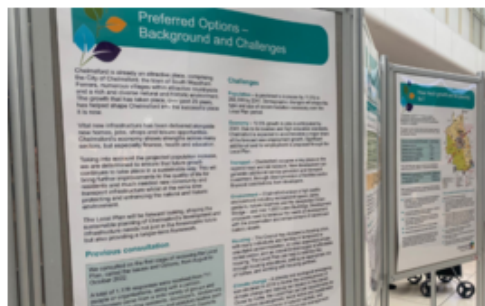
The council is reviewing its Local Plan and, as part of that process, a public consultation is currently running until **Wednesday 19 June**. Our online interactive exhibition is easy to navigate and it will guide you through key information about proposals for the Chelmsford district, which you can then respond to in the consultation.



[Read more](#)

### Local Plan consultation exhibitions

Opportunities are coming up to attend exhibitions in Chelmsford and South Woodham Ferrers to find out more about proposals for Chelmsford's future to **2041** as part of the Local Plan consultation. Find out more about the exhibitions and how to respond to the consultation, which runs until **4pm** on **19 June**.



[Read more](#)

# Example Site Notices



**LOCAL PLAN CONSULTATION SITE NOTICE 2024**  
**PREFERRED OPTIONS LOCAL PLAN SITE**  
**1aa—Coval Lane Car Park**

Chelmsford City Council have published for consultation its Preferred Options Local Plan.

This sets out future growth for Chelmsford up to 2041 and includes proposed site allocations for new residential and employment-led development. Site 1aa on the map shown is a new potential site allocation in the Preferred Options Local Plan.

Read and comment on the plan at [www.chelmsford.gov.uk/planningpolicyconsult](http://www.chelmsford.gov.uk/planningpolicyconsult). Paper copies can also be viewed at the City Council's Customer Service Centre, Civic Centre, Duke Street, Chelmsford, CM1 1JE, Monday to Friday 10am to 4pm (closed on bank holidays).

All information on this consultation is available at [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review)

**(THIS IS NOT A PLANNING APPLICATION)**

To find out more and discuss the consultation with a Planning Officer visit an in-person exhibition at the Civic Centre, Duke Street, Chelmsford on:

- Thursday 16th May 6pm-8pm
- Friday 17th May 1pm-3pm
- Saturday 18th May 10am-12pm
- Thursday 13th June 6pm-8pm
- Friday 14th June 1pm-3pm
- Saturday 15th June 10am-12pm (British Sign Language interpreter available on this day)

Please check our website [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review) for full details of all exhibitions and any changes to the timetable before making a special trip.

All representations must be received by 4pm on 19 June 2024.

If you require further assistance please call 01245 606330

Chelmsford City Council



## Staff Email Banner

**We're reviewing Chelmsford's adopted Local Plan**  
Find out more about the preferred options consultation running until 19 June 2024

**Chelmsford Local Plan**



## Bus Stop Adverts



# Local Plan Review Newsletter

NUMBER 2 May 2024

## What is a Local Plan?

A Local Plan shapes future growth and development of the City Council's area. It sets out a positive vision, identifies where and how new development should take place in the future as well as areas and land uses that will be protected.

### Why are we reviewing the adopted Chelmsford Local Plan?

We adopted our current Local Plan in May 2020 and good progress is being made with implementing it. We need to review the plan at least every five years to ensure that it remains up to date and continues to meet our needs for development growth to 2041 including new homes, employment opportunities, and facilities for local people such as new schools, healthcare provision and upgraded transport infrastructure.

Government requirements mean we must provide more homes but our aim is to get the right type of development in the right places to meet the growing needs of local people and businesses while protecting our environment. If the Local Plan becomes out of date, the Council could have very little influence over the location of new development and supporting infrastructure.

### What stage is the review at?

We are currently at the Preferred Options stage in the plan review process, with the plan due to

be adopted in 2025/26. Many people and organisations commented on the first Issues and Options stage consultation in 2022. All the responses have been carefully considered and used to progress the Preferred Options alongside an updated plan evidence base, national planning policy, new local priorities, and monitoring data.

A 'You Said We Did' feedback report and the evidence base of technical studies can be read on our website: [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review)

The Preferred Options document is a full draft local plan. It includes updated and new policies and sets out proposed sites where new homes, jobs and other facilities could be located, and contains policies that the council would use to decide planning applications.

We are inviting comments on the plan so residents can influence it and ensure that it is fit for purpose to meet local needs. We are not reopening any debates about the principle of already adopted allocated sites.



# New Development: Where and how much?

The Preferred Options plan follows the approach in the adopted Local Plan by continuing to focus new housing and employment growth to the most sustainable locations in three Growth Areas. The existing site allocations in the adopted plan which are not yet built are carried forward in the Preferred Options plan. Many of these sites are now coming forward, with masterplans being approved and planning applications decided or in progress and some sites have started building.

To meet additional growth needs to 2041 it is estimated that we need to allocate new sites for around 3,862 new homes with provision made for a further 1,500 new homes beyond 2041, and around 162,646sqm of new employment floorspace. This is over and above the new homes and employment land in the current plan. To accommodate this identified additional growth, we have reviewed the Spatial Strategy and are proposing new development sites. The preferred Spatial Strategy (Policy S7) shown in the consultation document has been informed by the outcome of the Issues and Options consultation and further evidence. **We are not considering growth in the Green Belt.**



## Central and Urban Chelmsford

Continued focus on strengthening the city as a centre for residential, employment and retail. Two existing allocations carried forward to the west and east of Chelmsford maximise cycling and walking opportunities into the City Centre.

### 1 Previously developed sites in Chelmsford Urban Area

- 2,765 homes (of which around 750 are on proposed new site allocations)

- 9,000sqm Business space

### 2 West Chelmsford

- 880 homes  
- 5 Travelling Showpeople Plots  
- Primary school and 2 nurseries  
- Neighbourhood Centre

### 3a-3d East of Chelmsford

- 3a Manor Farm: 360 homes  
- 3b Land North of Maldon Road: 5,000sqm Office/Business Park  
- 3c Land South of Maldon Road: 109 homes  
- 3d Land North of Maldon Road: 65 homes  
- Country Park  
- New pedestrian and cycle bridge to Sandford Mill

### 4 Land North of Galleywood Reservoir

- 24 homes

### 5 Land surrounding Telephone Exchange, Ongar Road, Writtle

- 25 homes

## North Chelmsford

North Chelmsford (Chelmsford Garden Community) will continue as a key area for new neighbourhoods and employment opportunities. New smaller allocations at Ford End and extensions to two existing employment areas. Existing allocations carried forward at Great Leighs and Broomfield.

### 6 North East Chelmsford (Chelmsford Garden Community)

- 6,250 homes

- 10 Gypsy and Traveller Pitches

- 10 Travelling Showpeople Plots  
- 56,946sqm Office/Business Park  
- Country Park  
- Chelmsford North East Bypass  
- 4 Neighbourhood Centres  
- 1 all-through school  
- 3 primary schools with nurseries  
- 2 nurseries

### 7a-7c Great Leighs

- 7a Land at Moulsham Hall: 750 homes  
- 5 Travelling Showpeople Plots  
- 7b Land east of London Road: 190 homes  
- 7c Land North and South of Banter's Lane: 100 homes  
- Neighbourhood Centre  
- Primary school with nursery

### 8 North of Broomfield

- 512 homes  
- Neighbourhood Centre  
- Nursery

### 9a Waltham Road Employment Area

- 3,500sqm B2/B8 Use

### 14a & 14b Ford End

- 14a Land west of Back Lane, Ford End: 20 homes  
- 14b Land south of Ford End Primary School: 20 homes

### 15 Little Boyton Hall Farm Rural Employment Area

- 6,000sqm B2/B8 Use

## South and East Chelmsford

Proposals include a new garden community at East Chelmsford (Hammonds Farm), and a strategic employment site. New smaller allocations in Bicknacre and East Hanningfield. Existing allocations carried forward at South Woodham Ferrers, Bicknacre and Danbury.

### 10 North of South Woodham Ferrers

- 1,220 homes  
- 5 Travelling Showpeople Plots  
- 1,200sqm Business Space  
- Neighbourhood Centre  
- 2 nurseries and potential primary school

### 11a-c Bicknacre

- 11a South of Bicknacre: 42 homes  
- 11b Land at Kingsgate: 20 homes  
- 11c Land west of Barbrook Way: 20 homes

### 12 St Giles, Bicknacre

- 32 homes

### 13 Danbury

- 100 homes

### 16a East Chelmsford Garden Community (Hammonds Farm)

- 3,000 homes to 2041 (plus 1,500 homes post 2041)  
- 20 Gypsy and Traveller Pitches  
- 43,000sqm Business Space  
- Country Park  
- Neighbourhood Centres  
- 1 all-through school  
- 2 primary schools and nursery  
- 3 nurseries

### 16b Land adjacent to A12 Junction 18

- 43,000sqm Business Space

### 17a & 17b East Hanningfield

- 17a Land North of Abbey Fields: 15 homes  
- 17b Land east of Highfield Mead: 20 homes

Highlighted text: Proposed new development allocations in the review of Local Plan.

## Local Plan policies

There are a number of new and updated policies included within the Preferred Options Local Plan. These cover many topics including housing, climate change, economy, environment, health and wellbeing, travel and transport, heritage, and design. We are not proposing to fundamentally change the general approach in the adopted Local Plan, but we want to take on board updated information and address some of our major challenges including acting on the climate emergency, responding to the housing affordability crisis and strengthening community ties.

It is important to note that the Local Plan is still evolving, and no firm decisions have been made at this stage. We will continue to gather evidence throughout the Local Plan preparation and the Preferred Options consultation will be an important aspect of this. **All the evidence and comments received will be used to prepare the final draft version of the Local Plan.**

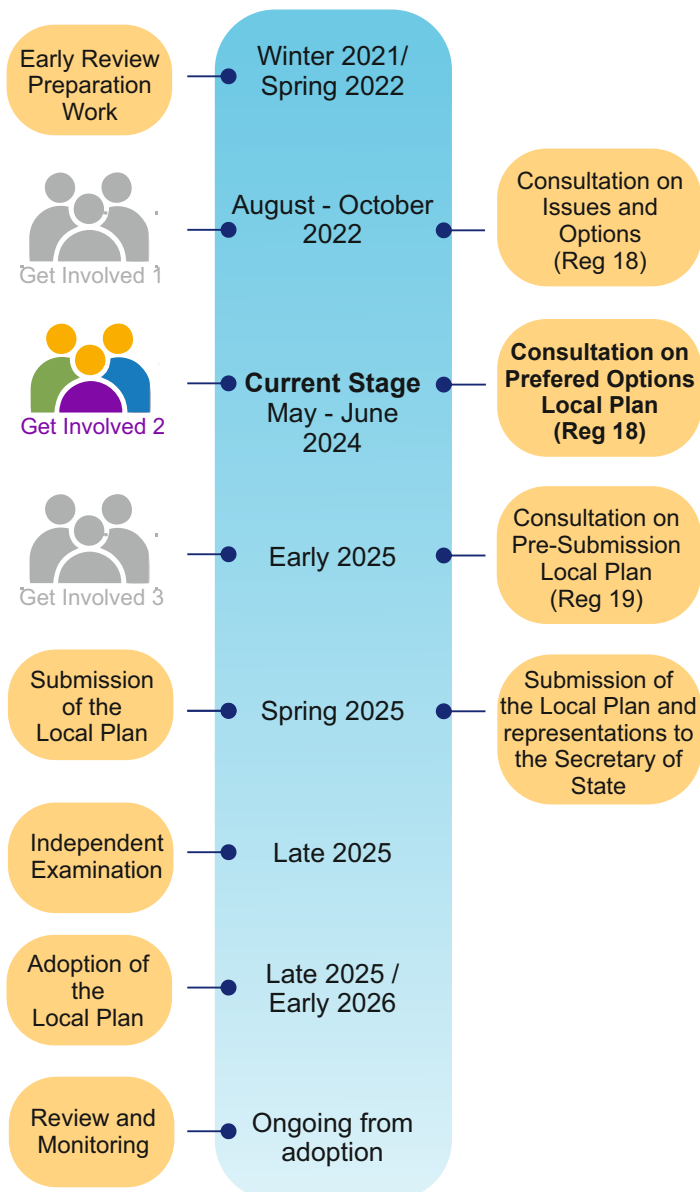
## What is the Integrated Impact Assessment (IIA)?

The IIA identifies the key sustainability issues for the Review of the Local Plan. These feed into a framework against which the proposals have been assessed. It covers the potential environmental, social, economic and health performance of the Local Plan and any reasonable alternatives. The IIA includes:

- Sustainability Appraisal (SA)
- Strategic Environmental Assessment (SEA)
- Habitats Regulations Assessment (HRA)
- Health Impact Assessment (HIA)
- Equality Impact Assessment (EqIA)

We will be consulting on the IIA as part of the Preferred Options consultation.

## What is the Local Plan timetable?



## Where can I view the consultation documents?

The consultation documents will be available to view and comment on via our consultation portal at [www.chelmsford.gov.uk/planningpolicyconsult](http://www.chelmsford.gov.uk/planningpolicyconsult). They will be available to read during normal opening hours at the Council's Customer Service Centre in Chelmsford.

There is an interactive online exhibition available during the consultation period – this can be found at [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review). We will also be holding in-person exhibitions at Civic Centre, Duke Street, Chelmsford. These exhibitions will provide an opportunity for you to find out more and discuss the consultation with a Planning Officer. These will be held on

- Thursday 16th May 2024 6pm - 8pm
- Friday 17th May 2024 1pm - 3pm
- Saturday 18th May 2024 10am - 12pm
- Thursday 13th June 2024 6pm - 8pm
- Friday 14th June 2024 1pm - 3pm
- Saturday 15th June 2024 10am - 12pm (with British Sign Language interpreter available)

## Consultation dates and how to have your say



The consultation on the Preferred Options documents runs for a period of six weeks from 10am on Wednesday 8 May 2024 to 4pm on Wednesday 19 June 2024. Comments made before or after these dates will not be considered.

You can respond:

- Via our consultation portal at [www.chelmsford.gov.uk/planningpolicyconsult](http://www.chelmsford.gov.uk/planningpolicyconsult).
- By email to [planning.policy@chelmsford.gov.uk](mailto:planning.policy@chelmsford.gov.uk)
- By post to Spatial Planning Services, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE.

### Next Steps

All comments will be used to inform the next stage of the process, the Pre-Submission Local Plan. We plan to consult on this in 2025.



## Document Control Sheet

Essex Highways

Transport Planning  
Victoria House  
Chelmsford  
CM1 1JR

W

[www.essex.gov.uk/highways](http://www.essex.gov.uk/highways)

|                       |                                |
|-----------------------|--------------------------------|
| <b>Project Number</b> | B3553RA3                       |
| <b>Status</b>         | Final                          |
| <b>Revision</b>       | 1                              |
| <b>Control Date</b>   | 12 <sup>th</sup> December 2024 |

### Record of Issue

| Issue | Status | Author | Date     | Check | Date     | Review | Date     |
|-------|--------|--------|----------|-------|----------|--------|----------|
| 1     | Draft  | JW     | 12-11-24 | SP    | 15-11-24 | SP     | 15-11-24 |
| 2     | Final  | JW     | 11-12-24 | SP    | 12-12-24 | SP     | 12-12-24 |

| Approved for Issue By | Date     |
|-----------------------|----------|
| KS (APM)              | 12-12-24 |

### Distribution

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## Preferred Spatial Approach – Response to Representations

The following table documents a summary of key representations made during the summer 2024 consultation on the transport modelling evidence base for Chelmsford City Council’s Local Plan Review Preferred Spatial Approach, along with Essex Highways’ response to queries raised.

| Table Item ID:  | Summary Point:   | Summary of detailed representation made:   | Essex Highways Modelling Response:   |
|---|--|--|--|
| Comment by: Wates Developments and Hammonds Estates LLP – Comment ID: PO24-4653 |  |  |  |
| 1.  | Clarity needed on the requirement for CNEB contributions                   | It is unclear currently from the council’s current transport evidence base why contributions to the CNEB are required, as this is not indicated by the results of the Transport Testing of the Preferred Option to 2041 (dated March 2024) and the Local Junction Capacity Assessment Modelling (dated May 2024); rather, the March 2024 document concludes that the completion of the CNEB is only required once capacity issues along the A12 mainline are addressed. On this basis, the requirement for the CNEB is associated primarily with background increases in traffic using the A12, rather than development trips at East Chelmsford Garden Community (Hammonds Farm). Clarification of this point, and therefore the robustness of this the policy requirement for S106 contributions towards this infrastructure, are sought and should be addressed more fully in the next iteration of the Plan. | Essex Highways understand that CCC and ECC are reviewing the funding options for delivery of the CNEB. Whilst the strategic modelling undertaken to support the Local Plan transport evidence base suggests that the distribution of trips between Hammonds Farm and the CNEB will be small (<10%), approximately one third of development trips to/from Hammonds Farm are shown in the forecast modelling to access the A12 Junction 19 Boreham Interchange, at the southern end of the CNEB. |
| Comment by: Wates Developments and Hammonds Estates LLP – Comment ID: PO24-4743 |  |  |  |
| 2.  | Disagreement on early conclusions regarding requirements for Hammonds Farm | Do not agree with some of the early conclusions about the requirements for the East Chelmsford Garden Community (Hammonds Farm). The executive summary on Page 11 of the Transport Appraisal of the Preferred Option (March 2024) states that: “Critical to the planning application process should be a requirement to ensure that background traffic flows along the A414 are not unreasonably delayed by the addition of development trips. This may well require significant highway measures in the vicinity of the site access”.   | The wording used in the Transport Appraisal of the Preferred Spatial Approach does not state that highway measures should be implemented to ensure a nil detriment impact of development at Hammonds Farm. Rather, that there is an expectation that sustainable and active mode measures, along with potential highway capacity improvements will be identified as part of the planning application process to mitigate against “unreasonable delays” to these modes –                        |

## Preferred Spatial Approach – Response to Representations

| Table Item ID:   | Summary Point:  | Summary of detailed representation made:   | Essex Highways Modelling Response:  |
|--|---|--|---|
|  |   | <p>We disagree with this statement as it is not consistent with NPPF Paragraph 115, where the key test relates to severity of impact, and not to protecting against “unreasonable delays” or providing “nil detriment” to motorists. Even if subsequent modelling evidence shows an increased period over which drivers would experience delay, it is not the aim of national or local policy to protect the convenience of commuting car drivers.</p>   | <p>which could ‘help to achieve’ a nil detriment impact.</p> <p>By “unreasonable delays” we (Essex Highways) mean, for example, a notable increase in journey times for background traffic flows - including buses and emergency service vehicles and/or delays that lead to a notable worsening of noise and air quality along the A414 corridor.</p>  |
| <p>Comment by: Walshingham Planning, on behalf of Little Baddow, Sandon, Boreham &amp; Danbury Parish Councils – Comment ID: PO24-8576</p> |   |  |   |
| 3.   | 5.1.10<br>Uncertainty in Hammonds Farm forecast beyond 2041 | <p>Both December 2023 and March 2024 evidence documents refer to uncertainty in forecasting forward beyond 2041 and therefore do not test more than 3,000 dwellings at East Chelmsford Garden Community (Hammonds Farm). There will always be uncertainty which requires addressing in forecasting, and whilst development locations beyond this Local Plan Review to 2041 are not known, it is considered that a sensitivity assessment of the East Chelmsford Garden Community in 2041 with 4,500 dwellings could provide an initial indication of the scale of impacts and mitigation required and may be helpful during the next stage of Local Plan evidence and formulation of the council’s IDP.</p> <p>Trip Generation: The Strategic Growth Site Policy 16a (Hammonds Farm) includes residential proposals for up to 4,500 dwellings to the period 2048. The Chelmsford VISUM model is only forecast to 2041 and allows for only 3,000 dwellings at the Hammonds Farm site. Again, the impact on the local highway network and at key junctions is likely to be far greater than is currently predicted as a result of the additional trips generated by the extra 1,500 dwellings.</p> | <p>Alongside the challenges of forecasting background levels of demand and road infrastructure 20+ years into the future and beyond the current Local Plan period, an assessment of an additional 1,500 dwellings at Hammonds Farm would require an assumption to be made on the mitigation already in place to support a 3,000 dwelling development by 2041. The scope and delivery timeframes for this mitigation have yet to be agreed between developers and ECC/CCC.</p> <p>Observations from the strategic modelling suggest that without capacity improvements, additional development traffic added to the A12 corridor would result in a wider dispersal of background traffic and/or reductions in peak hour trips being modelled. Therefore, the scale of impact from a further 1,500 dwellings, and the mitigation required, would be difficult</p> |

## Preferred Spatial Approach – Response to Representations

| <b>Table Item ID:</b> | <b>Summary Point:</b>   | <b>Summary of detailed representation made:</b>   | <b>Essex Highways Modelling Response:</b>   |
|-----------------------|---|---|---|
|                       |   |   | <p>to assess using the modelling methodology adopted for the Local Plan evidence base.</p> <p>It is, however, expected that any capacity improvement measures identified as part of the planning application process would be tested with a full 4,500 dwelling build-out, with assumptions to be agreed with developers on the volume of background growth to be applied.</p>  |
| 4.                    | 3.4.3 - 3.4.7<br>Lack of detailed modelling of site accesses at Hammonds Farm | No work has been undertaken to determine the location, type or scale of the Site access onto A14 Maldon Road required to accommodate the vehicle trips predicted to be generated by the Site.   | <p>The modelling undertaken for the appraisal of the Local Plan Preferred Approach, is strategic and area-wide in nature and further local/detailed modelling will be required and undertaken as part of the planning application process for the Hammonds Farm development.</p> <p>Whilst access proposals for Hammonds Farm have yet to be fully designed and assessed, the location of accesses onto the wider road network will be included in the Local Plan Pre-Submission modelling, based on outline developer proposals at this stage.</p> |
| 5.                    | 3.4.8<br>Lack of detailed modelling of junction 19                            | Whilst it is also proposed to provide an additional access to serve Strategic Growth Site Policy 16a via the A12 Junction 19 to the north, the modelling undertaken in support of the Preferred Spatial Approach does not include detailed analysis of Junction 19 with Local Plan Review development trips and it is therefore unclear if such an access can be accommodated at this junction to serve the Site. | Outputs from a VISSIM microsimulation model of A12 Junction 19, built to assess National Highways' A12 widening DCO proposals, will be referenced and evaluated within the context of the Local Plan appraisal as part of the next stage of modelling.  |

## Preferred Spatial Approach – Response to Representations

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|----------------|--|--|---|
|                |  |  | <p>Early concept development accesses onto the wider road network will be included in the latest Local Plan Pre-Submission strategic modelling, based on outline developer proposals.</p>   |
| 6.             | 3.4.11 – 3.4.13<br>Future impact on approach to Beaulieu Station not properly assessed | <p>The ‘Transport Impact Appraisal of Spatial Approaches’ (December 2023) report suggests that delays along the approach to the Beaulieu Rail Station should be monitored over time to determine the long-term viability of the route as a bus access link between the proposed allocated Site at Hammonds Farm and the railway station. Whilst this is typical for new developments as part of travel plan monitoring, proposing such a measure once infrastructure is already provided may be short sighted.</p> <p>The report goes on to say that “should future journey times to Beaulieu Station via the Boreham Interchange increase substantially, consideration should be given to placing additional focus on enhancing the provision of sustainable transport links to the existing rail station in Chelmsford city centre. Services could make use of the existing bus lane along the A1114 Essex Yeomanry Way (Baddow Bypass) and improved access through the redesigned Army and Navy Roundabout. However, PM peak traffic congestion along Parkway in the city centre would need to be managed to help improve travel times for buses heading out of the city centre.”</p> <p>These statements and worded solutions do not appear to fully address likely issues of congestion on the local highway network. This highlights the fact that further modelling work would be required to assess this scenario.</p> | <p>It is expected that analysis of outputs from the VISSIM microsimulation model of A12 Junction 19 will help to infer the level of future bus accessibility between Beaulieu Station and the proposed Hammonds Farm development.</p> <p>It is not within the practical scope of the Local Plan appraisal to assess the scale of mitigation required along alternative sustainable corridors into the city centre from the Hammonds Farm site. However, the Local Plan transport modelling evidence base does recognise the need for a city centre sustainable access corridor study to be undertaken as part of the Hammonds Farm planning application – should proposals for a bus service to Beaulieu Rail Station be compromised by access difficulties at the Boreham Interchange.</p> |

## Preferred Spatial Approach – Response to Representations

| <b>Table Item ID:</b> | <b>Summary Point:</b>  | <b>Summary of detailed representation made:</b>  | <b>Essex Highways Modelling Response:</b>  |
|-----------------------|--|--|--|
| 7.                    | 3.4.16 – 3.4.17<br>Evidence does not demonstrate suitable access to Hammonds can be provided | <p>Given that the proposed bus, walking, and cycling infrastructure improvements appear unlikely to achieve the necessary mode shift away from car use as set out above, there is concern as to the ability of appropriate Site access junctions to be provided to accommodate the likely vehicle trips generated by the proposed allocated Sites.</p> <p>The transport modelling evidence base does not clearly demonstrate suitable access can be provided to serve Strategic Growth Site Policy 16a at Hammonds Farm and Strategic Growth Site 16b to the south.</p>  | <p>The modelling undertaken for the appraisal of the Local Plan Preferred Approach, is strategic in nature, but where available, early-stage access proposals provided by developers of Local Plan sites will be modelled as part of the Local Plan Pre-Submission appraisal.</p> <p>More detailed modelling to assess the impact of proposed development on the local road network and the detailed mitigation required to accommodate new trips associated with it, will be required and undertaken as part of the planning application process for developments identified as allocated sites in the Local Plan.</p>  |
| 8.                    | 4.2.2 - 4.2.8<br>Use of 2019 model and historic traffic surveys                              | <p>Modelling for the critical A12 Junctions 18 and 19 are based upon 2019 traffic surveys that were used to support the strategic VISUM traffic model, which notably, has not been calibrated to turning movements at junctions.</p> <p>Traffic flows for modelling of the A12 Junction 18 have been based upon traffic surveys undertaken just prior to the Covid-19 pandemic. Whilst turning movement proportions have been checked against historic 2016 data, travel behaviour and patterns have changed since the pandemic and thus utilising data from this period may be unrepresentative of current conditions.</p> <p>Traffic survey data is typically valid for a period of three years and when considering the significance and scale of the proposed site allocations, use of recent and up to date traffic</p> | <p>The appendices of the ‘T002 - Transport Impact Appraisal of Preferred Spatial Approach – March 2024’ report contain the findings of a study undertaken to look at the differences in traffic flow patterns around Chelmsford in the years post-Covid-19. Whilst it is accepted that there are statistical differences between pre and post Covid-19 traffic flows at individual locations on the road network, at an aggregate level, there is no significant difference in either the AM or PM peak. This supports DfT findings that overall volumes are still at pre-pandemic levels and have not yet stabilised. Given that the VISUM model uses count data at an aggregate level, the 2019 validation is considered to still be</p> |

Preferred Spatial Approach – Response to Representations

| Table Item ID: | Summary Point:  | Summary of detailed representation made:  | Essex Highways Modelling Response:  |
|----------------|---|---|---|
|                |   | <p>survey data would be more appropriate for creating a base scenario for junction assessment.</p> <p>The base traffic survey data used to create the Chelmsford VISUM and local junction models requires updating to reflect current travel behaviour and patterns</p> <p>Significant manipulation of historic pre-Covid-19 pandemic traffic survey data has been undertaken to create baseline survey data to support junction assessments. The base traffic survey data used to create the VISUM and local junction models is therefore questionable and requires updating to reflect current travel behaviour and patterns.</p>   | <p>appropriate for use and provides a reliable, stable base for the modelling.</p> <p>Additional junction modelling will be undertaken as part of the Pre-Submission Local Plan appraisal which will use traffic data collected in September 2024 along the A12 corridor to improve base junction model validation/calibration in post-Covid conditions.</p> <p>It should be noted that calibration/validation to turning flows at junctions would not be expected for a strategic assignment model of the size developed for Chelmsford. Nevertheless, effort has been made to ensure that turning flows appear reasonable at key junctions, and where differences are noted, findings have been caveated in the analysis.</p> |
| 9.             | 4.3.1 - 4.3.13<br>Using 'Low' trip rates underestimates the volume of development trips | <p>It is suggested that the trip rates used in the forecast modelling are low as a result of internalisation and sustainable and active travel mode-share, however, these vehicle trip rate reducing factors would already be accounted for in the trip rates determined from the TRICS database. As such, these low vehicle trip rates used would in fact be a double counting of sustainable and active travel mode-share trips and thus significantly underestimate the vehicle trip generation of the proposed allocated sites.</p> <p>Given that it has already been identified that the proposed bus, walking, and cycling infrastructure improvements proposed as part of the Strategic Growth Area Policy 16a are</p> | <p>The Local Plan appraisal makes use of the core trip rates already found within the VISUM forecast model, which have been used across several studies in Chelmsford. These include; the appraisal of Army &amp; Navy junction design options (the modelling of which has been approved by DfT), the appraisal of the Chelmsford North-East Bypass, and the impact appraisal of the proposed Chelmsford Garden Community to the north of the city centre. It was considered appropriate to use the same trip rate assumptions to maintain consistency in approach across these studies.</p>  |

Preferred Spatial Approach – Response to Representations

| Table Item ID: | Summary Point:  | Summary of detailed representation made:   | Essex Highways Modelling Response:   |
|----------------|---|--|--|
|                |   | <p>unlikely to achieve the necessary mode shift away from car use, and the fact that a development proposal at Northeast Chelmsford of very similar nature to that proposed as part of the Site allocation at Hammonds Farm uses far higher, and as expected vehicle trip rates, for determining development vehicle trips suggests that vehicle trip rates used in the Chelmsford forecast model is significantly underestimated.</p> <p>Residential vehicle trip rates for the Local Plan Review Preferred Spatial Approach that are used in the Chelmsford forecast model appear to be significantly underestimated and the impact on the local highway network and at key junctions is likely to be far greater than is currently predicted</p>  | <p>It is recognised that the trip rates used are representative of an aspirational approach to development planning and the levels of trip generation that could be achieved with the successful implementation and uptake of sustainable and active mode infrastructure through travel plan monitoring, penalties for failing to meet targets, monitor and manage practices etc. The trip rates are, however, not considered ‘unrealistic’, and are aligned with latest NPPF guidelines for Local Plan development.</p>   |
| 10.            | 4.4.4 - 4.4.15<br>Impact on A12 J18 & lack of mitigation measures | <p>The impact of a Site Access along A414 Maldon Road to serve Strategic Growth Site Policy 16a and Strategic Growth Site 16b is unknown and may cause additional delay and queuing along the A414 Maldon Road approach to the A12 Junction 18. The existing model only assesses the impact of the additional vehicle trips on the A12 Junction 18 without understanding how vehicles queued back along A414 Maldon Road may block or impact on the operation of a Site access junction.</p> <p>The ‘Transport Impact Appraisal of Preferred Spatial Approach’ (March 2024) document suggests that initial proposals to mitigate the impact on the A12 Junction 18 are contained in the October 2022 Stantec report ‘Hammonds Farm Transport Technical Report’. These proposals will be refined through the ongoing Local Plan master planning and planning application process.</p> <p>A review of the Stantec report does not identify any other mitigation measures beyond those already proposed as part</p> | <p>Where available, early-stage access proposals provided by the Hammonds Farm developer will be modelled as part of the Local Plan Pre-Submission appraisal.</p> <p>However, the modelling undertaken for the appraisal of the Local Plan Preferred Approach, is strategic in nature, with a focus on the wider patterns of impact across the road network in Chelmsford. This is understood to be commensurate with the typical scope of modelling required for a Local Plan transport appraisal. More detailed modelling will be undertaken to assess the impact of development and access proposals on the local road network, and the detailed mitigation required, through developer Transport Assessments as part of the planning</p> |



## Preferred Spatial Approach – Response to Representations

| <b>Table Item ID:</b> | <b>Summary Point:</b>   | <b>Summary of detailed representation made:</b>   | <b>Essex Highways Modelling Response:</b>  |
|-----------------------|---|---|--|
|                       |   | of the Site allocation requirements, which include the sustainable and active travel bridge over the A12 and bus priority link to the north at the A12 Junction 19.   | application process for the Hammonds Farm development.   |
| 11.                   | 4.4.21 – 4.4.29<br>A12 J19 Boreham Interchange, insufficient evidence to demonstrate access at Hammonds can be accommodated | <p>In order to demonstrate that the A12 Junction 19 can be considered a suitable option for providing access to the Hammonds Farm site, further modelling work is required</p> <p>Whilst the VISUM strategic forecast model incorporates the latest Junction 19 designs and signal timings published as part of the A12 Chelmsford to A120 widening scheme DCO, it does not allow for the Site access to the Strategic Growth Site Policy 16a at Hammonds Farm.</p> <p>It should also be noted that all modelled junctions except for two, one of which is the A12 Junction 19, were built using demand flows taken directly from the 2041 Chelmsford VISUM forecast model for scenarios with and without Local Plan Review development trips.</p> <p>Current modelling results related to the A12 Junction 19 that are presented in the evidence base in support of the Preferred Spatial Approach cannot be relied on and do not demonstrate that at this stage, an additional access from the A12 Junction 19 to serve the allocation of development at Hammonds Farm can be accommodated.</p> | Updated junction modelling will be undertaken as part of the Pre-Submission Local Plan appraisal, including the use of outputs from a VISSIM microsimulation model of A12 Junction 19, built to assess National Highways' A12 widening DCO proposals. Where available, early-stage access proposals provided by the Hammonds Farm developer will be modelled at A12 Junctions 18 and 19. |

14 December 2023

Ref: LBD/AONBAPP/DEC23



Mail Hub  
Worcester County Hall  
Spetchley Road  
Worcester  
WR5 2NP

<<By email only>>

Dear

Thank you for your email enquiry and for sharing your report on the natural, cultural, and historical significance of the Little Baddow and Danbury area in Essex with Natural England in support of the Danbury Ridge and the Chelmer Valley National Landscape Working Group's ambition for a National Landscape designation in this area. We acknowledge the accompanying letters of support for the Danbury Ridge and the Chelmer Valley National Landscape you propose submitted to us alongside your report from the National Trust, Essex Wildlife Trust, Essex Waterways & the Essex Bat Group.

By way of update, since our last written correspondence, Natural England are still working on the current round of National Landscape (Area of Outstanding Natural Beauty, AONB) designation projects announced in [June 2021](#), these are:

- A new Yorkshire Wolds AONB
- A new Cheshire Sandstone Ridge AONB
- An extension to the Surrey Hills AONB
- An extension to the Chilterns AONB

Landscape designation is a multi-year process and we remain fully resourced and committed to the above four cases. Additionally, following on from [Government's announcement on 29 November 2023](#), we will be starting work to consider the possibility of designating a new National Park. We are therefore not taking on any additional new designation projects at the current time.

It is important to note that there is no formal application process for National Park or National Landscape (AONB) designation. Natural England takes an evidence-led approach, using information such as the All-England Strategic Landscape Mapping Assessment Tool. We are also guided by government policy steers, and any future search will be England-wide.

Natural England is not in a position to confirm timescales for when our next landscape designation programme will commence, nor to confirm the format for the process. We will, however, keep the report you have submitted to us and supporting documentation on file in addition to any further appendices you wish to submit to us.

Yours sincerely,

West Anglia Area Team



## WELBECK STRATEGIC LAND V LIMITED

6<sup>TH</sup> FLOOR, ONE LONDON WALL, LONDON, EC2Y 5EB TEL: 020 7529 3800

By email only:

[Jeremy.Potter@chelmsford.gov.uk](mailto:Jeremy.Potter@chelmsford.gov.uk)

28<sup>th</sup> October 2024

Dear Jeremy,

**Re: Land West of Barbrook Way, Bicknace (Draft Allocation 11c)**

Further to our discussions, I write in relation to the above draft allocation, and in response to some third party comments received as part of the Preferred Options Consultation on the Local Plan Review that closed in June 2024. It is understood that concerns have been raised in relation to access being deliverable from Barbrook Way. This Statement seeks to provide comfort that the site is deliverable.

For context prior to entering the Promotion Agreement for the land Welbeck Land undertook significant due diligence into potential access points for the development. This included a detailed topographical survey and significant investigation into any legal issues related to land ownership.

The results of our highways search would indicate the extent of the adopted highway does not include this sliver of land albeit due diligence is ongoing to see if the underlying s38 agreement for Barbrook Way can be secured in order to check that the highways search result is correct and the sliver of land is not, indeed, adopted.

We have also undertaken detailed investigations into any potential third parties (persons or entities) that may be able to successfully claim ownership of the land. Our research has not identified any such party that could realistically make such a claim. With this information we have been able to secure an indemnity insurance policy which benefits the development site, successors in title, service providers and alike to protect against the risk, however slim, of any third party either seeking to claim ownership of the third party strip and being successful in doing so.

These indemnity insurance policies exist precisely for such scenarios which are not unusual, particularly given errors in the mapping on Land Registry UK, often owing to many of the boundaries being drawn historically. Therefore, we strongly believe that the Council should consider this sufficient to demonstrate that the site is deliverable, and there is no reason to discount it or remove its allocation for housing in the forthcoming Plan.

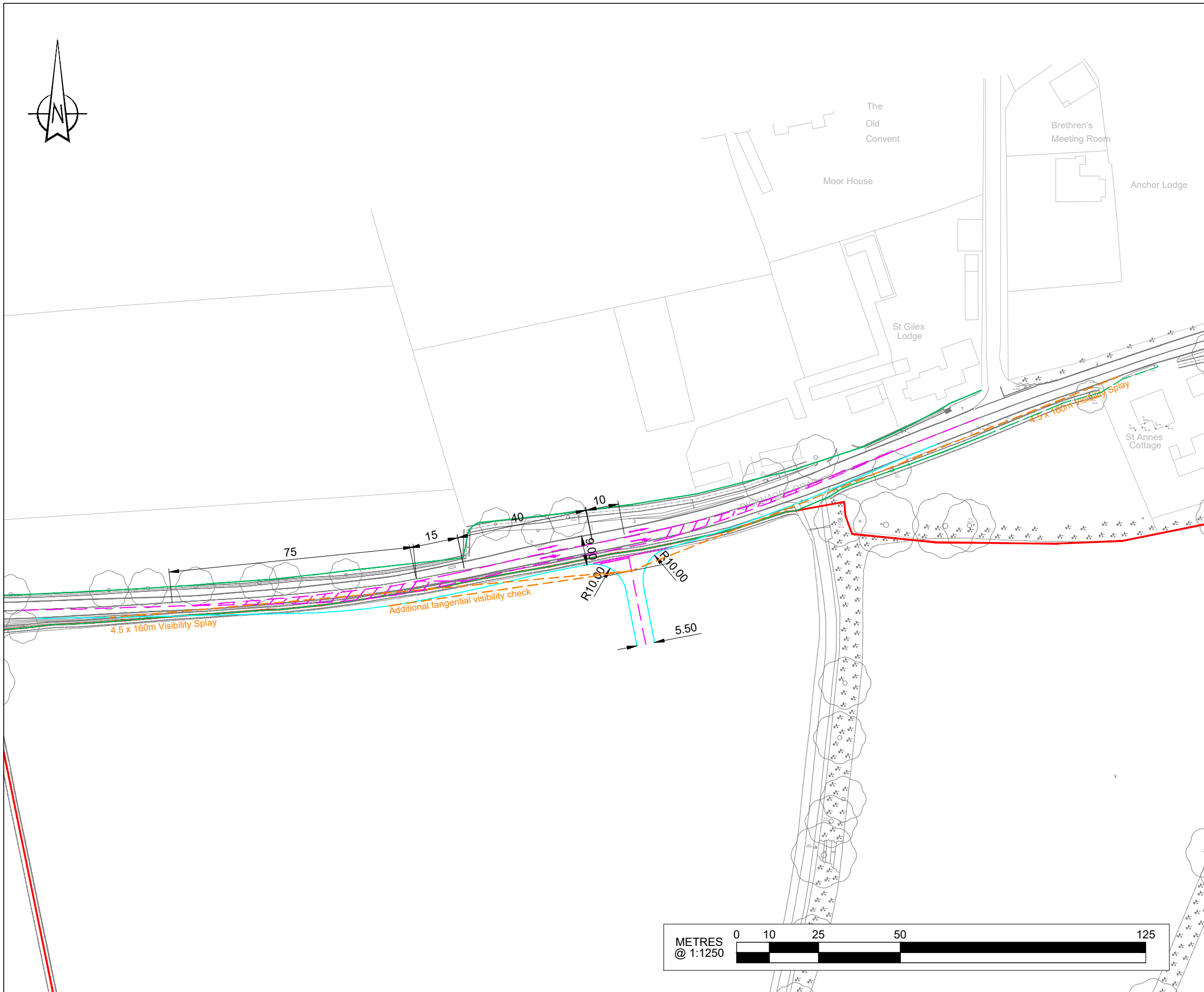
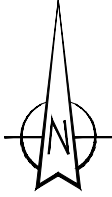
Furthermore, and as provided to the Council we have to date produced several indicative masterplans of varying scale from 160 to 250 dwellings. Given our confidence in our ability to rely on Barbrook Way we have indicated this as our primary access.

However, our detailed investigations have demonstrated that alternative access points are available from Priory Road. Although it is acknowledged that this is not the Council's preferred option, it does

assist in demonstrating that the site is not ransomed. Enclosed are the alternative options for information.

Yours sincerely

**Alice Lack MRTPI  
Director  
Welbeck Strategic Land V Limited**



**NOTES:**

1. Do not scale from this drawing, work to figured dimensions only.
2. Dimensions are in metres unless stated otherwise.

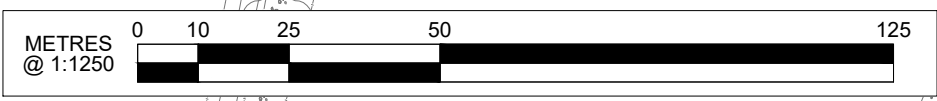
**KEY:**

- 4.5m x 160m Visibility Splay\*
- Highway Boundary confirmed by ECC
- Interpolated Highway Boundary subject to confirmation by ECC

\*Table 2.10 DMRB CD109 design speed 85kph (see below). Based on speed survey data of 85th percentile Eastbound: 76.2kph (Eastbound), 79.5kph (Westbound), August 2024

| Design speed kph                 | 120 | 100 | 85  | 70  | 60 | 50 | V2/R |
|----------------------------------|-----|-----|-----|-----|----|----|------|
| Stopping sight distance (metres) |     |     |     |     |    |    |      |
| Desirable minimum                | 295 | 215 | 160 | 120 | 90 | 70 | -    |
| One step below desirable minimum | 215 | 160 | 120 | 90  | 70 | 50 | -    |

Designed in accordance with DMRB CD 109, CD123 and Essex Design Guide. See above for design speed

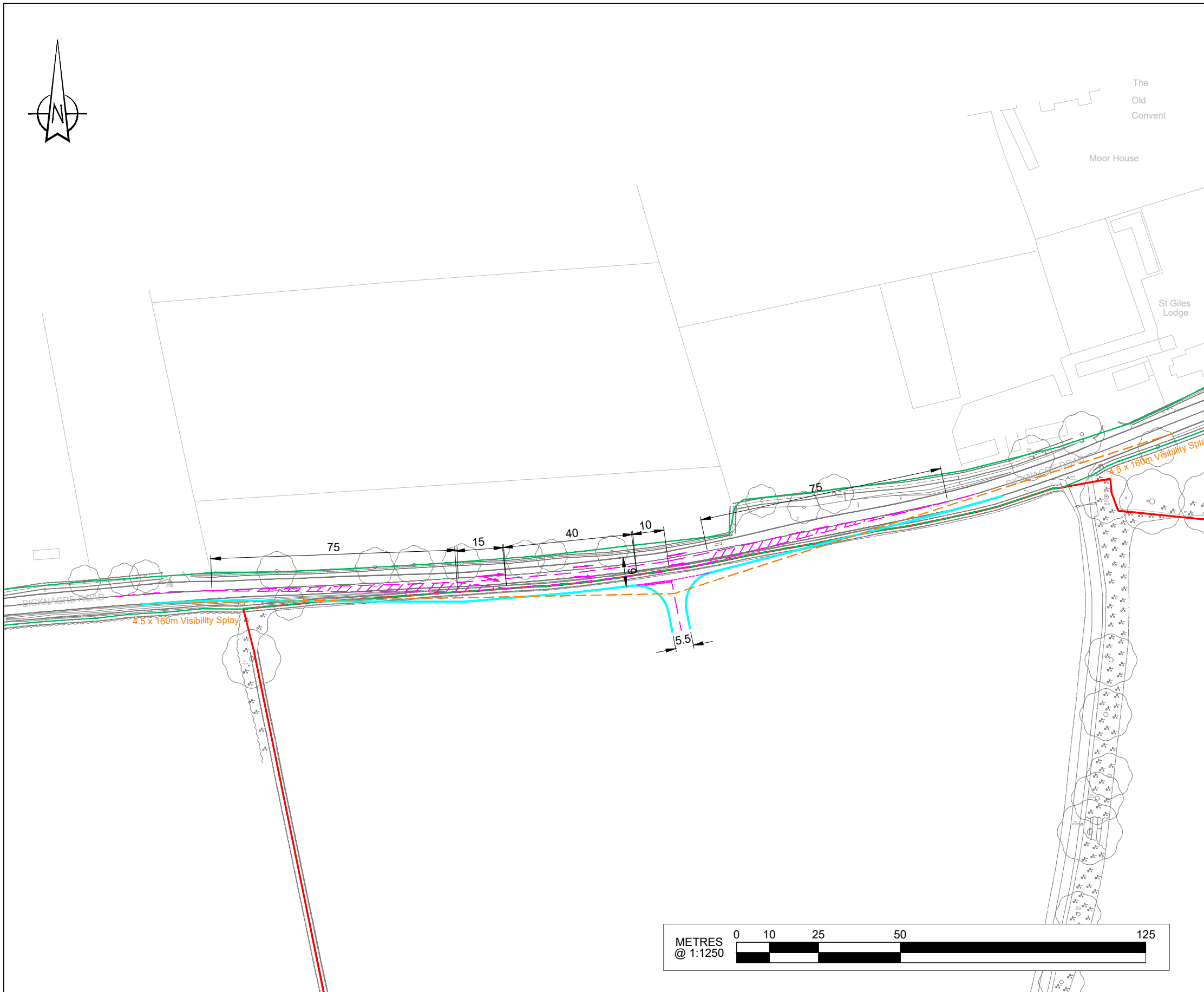
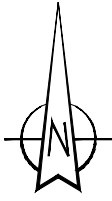


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|         |  |  |  |
|---------|--|--|--|
| Project | Bicknacre                                  |  |  |
| Title   | Site Access Ghost Island<br>Bicknacre Road |  |  |

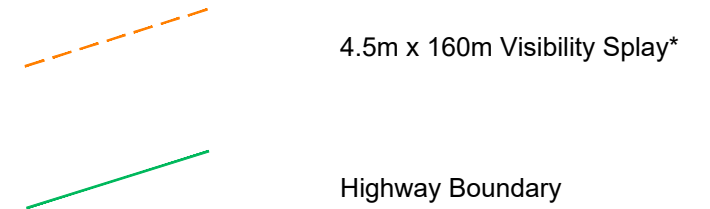
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|----------|---|-------------------------|-------------|--------|-----------|
| P03      | Amended Location                            | GR                      | PC          | PC     | 11.10.24  |
| P02      | Confirmation of Highway and Site Boundaries | GR                      | MN          | PC     | 11.09.24  |
| P01      | Initial                                     | GR                      | PC          | PC     | 28.08.24  |
| REV      | DESCRIPTION                                 | DRN                     | CHK         | APP    | DATE      |
| Client   | Welbeck Land                                |                         |             | Status | INITIAL   |
| Drawn    | GR  | 27.08.2024              | Status Code |        | -         |
| Designed | GR  | 27.08.2024              | Scale       |        | 1:1250@A3 |
| Checked  | PC  | 28.08.2024              | Revision    |        | P03       |
| Approved | PC  | 28.08.2024              | Project No. |        |           |
|          |   | 109436-XXXX-DR-H-000003 |             |        |           |



**NOTES:**

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2. Dimensions are in metres unless stated otherwise.

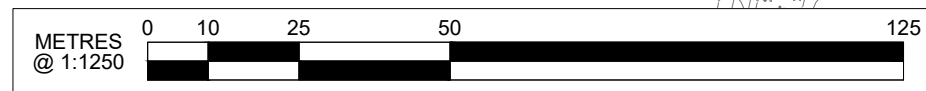
**KEY:**



\*Table 2.10 DRMB CD109 design speed 85kph (see below). Based on speed survey data of 85th percentile Eastbound: 76.2kph (Eastbound), 79.5kph (Westbound), August 2024

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|----------------------------------|-----|-----|-----|-----|----|----|------|
| Stopping sight distance (metres) |     |     |     |     |    |    |      |
| Desirable minimum                | 295 | 215 | 160 | 120 | 90 | 70 | -    |
| One step below desirable minimum | 215 | 160 | 120 | 90  | 70 | 50 | -    |

Designed in accordance with DMRB CD 109, CD123 and Essex Design Guide. See above for design speed



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Project  
**Bicknacre**

Title  
**Site Access Ghost Island  
 Bicknacre Road**

|     |   |     |     |     |          |
|-----|---|-----|-----|-----|----------|
| P02 | Confirmation of Highway and Site Boundaries | GR  | MN  | PC  | 11.09.24 |
| P01 | Initial                                     | GR  | PC  | PC  | 28.08.24 |
| REV | DESCRIPTION                                 | DRN | CHK | APP | DATE     |

|             |                                 |            |  |             |                  |
|-------------|---------------------------------|------------|--|-------------|------------------|
| Client      | <b>Welbeck Land</b>             |            |  | Status      | <b>INITIAL</b>   |
|             |                                 |            |  | Status Code | -                |
| Drawn       | GR                              | 27.08.2024 |  | Scale       | <b>1:1250@A3</b> |
| Designed    | GR                              | 27.08.2024 |  | Revision    | <b>P02</b>       |
| Checked     | PC                              | 28.08.2024 |  |             |                  |
| Approved    | PC                              | 28.08.2024 |  |             |                  |
| Project No. | <b>1090436-XXXX-DR-H-000003</b> |            |  |             |                  |



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