

**IO003**

Chelmsford Local Plan

**Issues and Options  
Consultation Document  
You Said We Did  
Feedback Report**

May 2024

*Our Planning Strategy 2022 to 2041*

**Chelmsford**  
Local Plan



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## Abbreviations

BNG	Biodiversity Net Gain
CCC	Chelmsford City Council
CLT	Community Land Trust
DSB	Defined Settlement Boundary
ECC	Essex County Council
EDG	Essex Design Guide
EPOA	Essex Planning Officers Association
EqlA	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
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
SANG	Suitable Alternative Natural Greenspace
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
SRA	Specialist Residential Accommodation
SPA	Special Policy Area
SPD	Supplementary Planning Document
TCPA	Town and Country Planning Association
UAB	Urban Area Boundary

## Executive Summary

This report sets out:

- Summary of the consultation undertaken (Section 1)
- Summary of representations received (Section 2)
- The main issues raised in the representations received and summary of how the Preferred Options Local Plan has been informed by the previous comments and the plan evidence base (Section 3).

It supersedes the Issues and Options Feedback Report published in February 2023.

The Issues and Options consultation document sought to gather views on the key issues for the future growth and development of the city and potential approaches for accommodating projected growth requirements up to 2041.

### About the Consultation

A comprehensive ten-week programme of consultation took place during the extended consultation period which ran from 11 August to 20 October 2022. The consultation was promoted through a range of activities including email/letter notifications to more than 2,100 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 Issues and Options Local Plan

A total of 1,178 responses were received to the Issues and Options Local Plan consultation from 711 respondents, along with a petition of 2,202 signatures opposed to exploring a new settlement at Hammonds Farm (Spatial Approach E, within Little Baddow/Sandon parishes).

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 [planning policy consultation portal](#).

The consultation asked for views on the key issues and options contained within the consultation document through 66 questions. An overview of the key issues raised to key areas we consulted on are:

Strategic Priorities:

- Overall support for the draft Strategic Priorities as they are stronger, clearer and better focused
- New Strategic Priorities 1 and 2 are particularly welcomed
- Some detailed wording amendments are proposed



- Some land promoters urge a review of the Green Belt to avoid a distorted settlement growth pattern, to release sites which may be more sustainable, and to locate housing where the need arises
- Some additional Strategic Priorities are suggested including cross boundary planning, solar panels on new homes, action on empty homes, the circular economy and commitment to funding infrastructure.

#### Vision

- Supporters welcome it for being clear and concise
- Objectors consider it is too vague, unmeasurable and not Chelmsford specific enough
- Some suggest additional wording including adding in 'healthier'
- Could be more outward looking and reflect Chelmsford's role as a regional centre
- Too Chelmsford City specific
- Many support refining the adopted plan vision.

#### Spatial Principles:

- Good level of general support regarding their context, but suggestions that they should be directly measurable, more precise and have less ambiguous wording
- Many developers consider there should be a review of the Green Belt
- Many of the public thought they were admirable but unobtainable
- Some detailed wording amendments are proposed
- Some unclear of the purpose of the Spatial Principles and question if they are unnecessary duplication
- Some suggest there is a need to do more to support the rural community and economy.

#### Meeting the needs for new homes:

- General good level of support for using the standard method to calculate housing needs, having the 20% supply buffer, and for the Council to meet its own housing needs, though this needs to be clearly evidenced and explained
- Several suggest that the Council is overproviding for housing so it should consider taking some of other South Essex Authorities needs
- Limited support for affordable housing sites on the edge of Defined Settlement Boundaries as they may isolate residents
- Some consider there is a need for specific policies to address Specialist Residential Accommodation, with particular reference made to the needs of older persons
- Reasonable support for a higher housing number to help meet the needs of specific groups (including affordable housing)
- Some suggestion that 10% of the housing requirement being on small sites could be higher to support small and medium builders.

#### Types of location for growth and Spatial Strategy Approaches for accommodating additional future growth to 2041:

- Respondents commented on the types of location, with many focused on one of the five Spatial Approaches – with a mixed reception overall
- Growth in urban areas is supported as a sustainable approach
- Expanding allocated sites raised concerns about the ability of infrastructure to cope, although is supported for sustainability
- Growth along transport corridors received a mixed response: the A12 should be included, it can provide good access, but it may direct growth away from the city
- Development at larger villages is not supported due to impact on Danbury and South Woodham Ferrers, although sustainability is seen as more important than village size
- Development at smaller villages is not supported due to impact on small community character, access and services, although it could support local vitality
- A new large settlement is generally opposed for a wide number of reasons including landscape, environment, loss of agricultural land, impact on services and roads, lack of flexibility, potential delays in delivery; although limited support shown for a sensitive approach.

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

The responses received to the consultation alongside ongoing discussions with infrastructure providers about their services, such as education, and completion of evidence studies covering topics including traffic modelling, landscape and flood risk have been used to help inform the Preferred Options Local Plan. The Preferred Options Local Plan also reflects national guidance and will be subject to public consultation.

## **Introduction**

The Issues and Options consultation represented the first formal stage in the preparation of the Review of the Adopted Chelmsford Local Plan. The consultation document set out the key issues for the future growth and development of the city and potential approaches for accommodating the projected growth requirements up to 2041. The consultation was 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 Issues and Options document and how the comments have been taken into consideration alongside the plan evidence base when preparing the Preferred Options Local Plan.

This report sets out:

- Summary of the consultation undertaken (Section 1)
- Summary of representations received (Section 2)
- The main issues raised in the responses received on the Issues and Options Local Plan (in question order) and summary of how the Preferred Options Local Plan has been informed by the responses and plan evidence base (Section 3).

The report does not summarise all the representations or identify every individual issue. It also does not provide a Chelmsford City Council (CCC) response to each individual comment. A summary is provided of what the evidence says about the topic area and an overview of how this issue is addressed in the Preferred Options Local Plan.

This report supersedes the Issues and Options Feedback Report published in February 2023.

## Section 1. Summary of Consultation Undertaken

A comprehensive ten-week programme of consultation took place during the formal consultation period. This was originally planned from 11 August to 6 October 2022, covering eight weeks, rather than the statutory six weeks, to allow extra time due to the consultation starting within the summer holiday period. The consultation period was extended by a further two weeks until 20 October following the death of Her Majesty, Queen Elizabeth II, to allow some consultation events to be rescheduled.

This programme of consultation followed (and exceeded) the requirements set out in legislation<sup>1</sup>, and the commitments in the Council's adopted Statement of Community Involvement (September 2020)<sup>2</sup>.

The package of documents published on 11 August comprised:

- Issues and Options Consultation Document; and
- 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 Council offices and local libraries.

The Council notified more than 2,100 contacts registered on its Consultation Portal. These included public, statutory agencies such as Essex County Council and 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:

- Four staffed exhibitions, including a Member and staff drop-in, visited by more than 80 people
- 20 days of unstaffed exhibitions
- Four pop-up displays for the whole consultation period
- A bespoke Local Plan video, attracting 850 views
- An online virtual exhibition, visited by more than 330 visitors
- A live webinar (an experimental event with 4 attendees)
- Officers also held targeted engagement with the Parish/Town Council Forum and Agent/Developers Forum, and presented at the North West Parishes Group.

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<sup>1</sup> Town and Country Planning (Local Planning) (England) Regulations 2012  
<https://www.legislation.gov.uk/uksi/2012/767/contents>

<sup>2</sup> Statement of Community Involvement <https://www.chelmsford.gov.uk/media/byjfrq2v/statement-of-community-involvement-adopted-september-2020.pdf>

Printed/online materials and advertisements were produced as follows:

- Web page with links to key materials
- Two advertisements in a local newspaper
- Five articles in City Life (CCC's online news website), one in South Woodham Focus (independent community magazine)
- 32 social media posts
- Posters distributed to Parishes, CCC offices and leisure facilities, post offices, doctors' surgeries, churches and local shops
- Two large public car park posters
- Summary newsletter widely available, in addition to being handed out at Chelmsford and South Woodham Ferrers railway stations
- Three gov.delivery 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: Issues and 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. A summary of how the representations have been used is set out in the Preferred Options IIA.

### **Call for Sites**

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. Around 100 further sites were submitted through this process. An assessment of the sites received is contained within the 2023 Strategy Housing and Employment Land Availability Assessment (SHELAA) published on our website.

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

All responses have been considered in detail and used to help inform the next stage of the review Local Plan (the Preferred Options Consultation Document). This is alongside ongoing discussions with infrastructure providers about their services, such as education, and completion of evidence studies covering topics including traffic modelling, landscape and flood risk. The Preferred Options will also reflect national planning policy guidance and be subject to public consultation.

## **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.

There were 66 questions, mostly consisting of a main question with related questions seeking views and missing information, 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 question they were answering, officers have assigned responses to the most relevant question, with miscellaneous responses being recorded against Question 62. Where a preference was invited (i.e. a yes or no answer), 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, and these have been analysed and included in the figures in this report. In addition, five representations were considered to be '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 will focus on the issues raised, rather than the number of representations to any individual question.

### **Overview of responses**

A total of 1,178 responses were received to the consultation from 711 respondents, along with a petition of 2,202 signatures opposed to exploring a new settlement at Hammonds Farm (Spatial Approach E, within Little Baddow/Sandon parishes).

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 <sup>3</sup>	Key bodies consulted on strategic matters, including Essex County Council, adjoining local authorities, Historic England, Natural England, Environment Agency	12
Specific bodies/groups	Parish/Town Councils, utility bodies, health and transport consultees etc	30
General and Other bodies/groups	Voluntary groups, religious groups, housing providers, businesses etc	18
Developers/landowners	Landowners, promoters of land and their agents	91
Public	Individual members of the public	560

How people made their comments:

Method of making comments	Number of Respondents	Percentage
Online consultation portal	89	12.5%
E-mail	174	24.5%
Letter	448	63%

Higher than the anticipated/normal number of letters and e-mails were received, due to comments being sent on pre-printed forms prepared by Little Baddow Parish Council, expressing opposition to exploring a new settlement at Hammonds Farm (Spatial Approach E, within Little Baddow/Sandon parishes).

All the comments received can be viewed 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

<sup>3</sup>Duty to Co-operate Strategy, January 2022 <https://www.chelmsford.gov.uk/media/4e5awqhr/duty-to-co-operate-strategy-january-2022.pdf>

- 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 questions included in the complete version of the full document are prefixed I&O22.

Responses to the stand-alone questionnaire are prefixed I&OQ22.

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?	65	44	21

If yes, please select the settlement which you live in or near	Number of Reps
Bicknacre	2
Boreham	4
Broomfield	0
Chatham Green	0
Chelmsford Urban Area	14
Danbury	2
Downham	0
East Hanningfield	0
Edney Common	0
Ford End	1
Galleywood	0
Good Easter	0
Great Leighs	1
Great Waltham	1
Highwood	0
Howe Green	0
Little Baddow	7
Little Waltham	0
Margaretting	0
Ramsden Heath	1
Rettendon Common	1
Rettendon Place	0
Roxwell	0
Runwell	0
Sandon	0



If yes, please select the settlement which you live in or near	Number of Reps
South Woodham Ferrers	5
Stock	0
West Hanningfield	0
Woodham Ferrers	1
Writtle	2
Other (including Great Baddow, Newlands Spring, out of CCC area representing client)	9

<b>Optional Monitoring Question OM2</b>	<b>Percentage</b>
How did you hear about the consultation?	
CCC Website	20%
Social media	9%
Word of mouth	12%
Newspaper advert	2%
Parish Council website/newsletter	11%
Poster	0%
Attended a Local Plan exhibition	6%
Local Plan Newsletter	8%
Direct notification email/letter	26%
Other (including joint working, representing client)	6%

## Section 3. Main Issues Raised in Consultation Responses

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 to each question. After that, two tables are provided which summarise firstly how the Preferred Options Local Plan has been informed by the plan evidence base and secondly the Issues and Options consultation responses. The full evidence base can be viewed at [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review).

It is important to note that the report does not summarise all the representations received or identify every individual issue. It also does not provide a Chelmsford City Council (CCC) response to each individual comment.

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

### **Part 2 Context**

This section of the consultation document sets out the background to the plan review including a summary of the changes that have happened since the Local Plan was adopted in 2020 and the key challenges and opportunities to address over the reviewed plan period to 2041.

Key statistics:

<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
<b>1. Do you agree with the challenges and opportunities identified for the review of the adopted Local Plan? If not, please explain why. Where possible, please support your answer with reference to any evidence.</b>	51	15	64	130

Summary of Specific and DTC consultees comments:

- Agree with the challenges and opportunities identified (Braintree District Council, Mid and South Essex Integrated Care Board (ICB), Anglian Water Services Ltd, Essex County Council)
- Another challenge is securing enough water and sewerage provision in an area which is dry (Braintree District Council)
- Agree with the need to build stronger communities with community infrastructure and improved health and wellbeing outcomes (Mid and South Essex Integrated Care Board (ICB))
- Updated evidence base and a Water Cycle Study will help inform the spatial distribution of growth (Anglian Water Services Ltd)
- Welcome a whole life carbon assessment to inform the spatial distribution of development, including the infrastructure required to support it (Anglian Water Services Ltd)

- Supportive of policy targets relating to climate change and the effective and efficient use of water resources (Anglian Water Services Ltd)
- Support many of the aims including addressing the affordable housing crisis and economic change, increasing biodiversity, incorporating sustainable and active travel and improving health and wellbeing as these align with Essex County Council (ECC) Strategies (Essex County Council)
- Consider the future vision set out in the Government's Build Back Better High Streets (Essex County Council)
- Look at the impact of home working on existing office space in the city centre (Essex County Council).

#### Summary of General Consultees Comments:

- Support (Newland Spring Residents Association).

#### Summary of Developer/Landowner/Agent Comments:

- Support for the challenges and opportunities identified (Wates Developments Limited, Bellway Homes Ltd, Bellway Strategic, Richborough Estates, Chris Buckenham, The Bucknell Family, Bolton, S&D, Gray & Sons, Dandara Eastern, Mr Alexander Micklem, Grosvenor Property UK and Hammonds Estates LLP, Cliffords Group and Mr Mark Peters, Pigeon (Sandon) Ltd, Dandara, Dominvs Group, Taylor Wimpey)
- National Planning Policy Framework (NPPF) encourages policies and vision to look at the next 30 years so the Local Plan and Vision should look beyond 2041 (Chris Buckenham, Mr Alexander Micklem)
- Development should be sited in the most sustainable locations particularly in respect of access to major roads, public transport, walking/cycle links, local facilities and green infrastructure (Wates Developments Limited, Bellway Strategic, Bolton, S&D)
- Development should take advantage of the forthcoming infrastructure being delivered as part of the current Local Plan (Wates Developments Limited)
- Encourage growth across all sustainable settlements which would support existing services and facilities in those locations (Dandara Eastern)
- Important to encourage development in rural villages and communities so that they do not stagnate or decline (Croudace Homes)
- Should develop brownfield sites (London & Cambridge Properties Limited)
- Opportunity for large developments which straddle the boundary of neighbouring authorities (Richborough Estates)
- There should be an increased emphasis since the pandemic on growing a strong local economy and employment opportunities (The Bucknell Family, Gray & Sons, Pigeon (Sandon) Ltd)
- Plan should be flexible and be able to react to changes in economic conditions and growth in different employment sectors (Pigeon (Sandon) Ltd)
- Welcome the attention on the future role of the city centre (Dominvs Group)
- There are opportunities to integrate development into existing and planned green and blue infrastructure (Obsidian Strategic Asset Management Ltd)
- Development provides the opportunity to enhance habitats and provide biodiversity net gain (BNG) (Obsidian Strategic Asset Management Ltd)

- Need to consider the impact of flooding on the city centre presented by climate change (Vistry Group)
- There are opportunities for enabling development to facilitate key infrastructure which could alleviate the flood risk (Vistry Group)
- More assessment is needed about how the Council will provide Specialist Residential Accommodation (Mrs Mary Rance, Inspired Villages).

Summary of Public Comments:

- Agreement with the challenges and opportunities identified
- Support emphasis on the climate and ecological emergency
- Concerns about the extra housing numbers required which is not in line with addressing climate change and could have a negative impact on wildlife and countryside
- Current infrastructure cannot cope including roads such as the A12
- Need to acknowledge the energy crisis
- Affordable homes need to be affordable
- Build quality should exceed building regulations requirement
- Should be less focus on cycle ways
- London and airports need to be more accessible by road
- Add provision for social activities/facilities for young people
- Securing enough finance is a challenge/constraint
- Identify efficiency savings as a challenge or opportunity
- Growth is an opportunity to improve services and reduce costs
- Not enough emphasis on retaining linked up woodland and countryside to other services and infrastructure severing parts of the countryside
- Need to increase focus on improving biodiversity
- Need to build the infrastructure for the current population and projected growth first
- Concerns over the increase in traffic on health and wellbeing
- Development should be located where transport links and infrastructure are already in place and not in locations physically disconnected from Chelmsford.

**Our evidence says**

The Preferred Options Local Plan has been informed and supported by a number of evidence base studies including the Preferred Options Integrated Impact Assessment (IIA), Employment Land Review 2023, Water Cycle Studies 2024 and Strategic Flood Risk Assessments 2024. The evidence base assists in identifying the challenges and opportunities for the plan such as opportunities for investment in infrastructure, economic growth, environmental benefits and access to services when identifying suitable locations for development.

The Preferred Options IIA 2024 considers that the preferred Spatial Strategy will focus new housing and employment growth to the most sustainable locations when considered against national planning policy, analysis of responses to the I&O, environmental constraints, discussions with key stakeholders, availability/viability of land, the settlement hierarchy, and draft Vision/Spatial Principles. It also finds that many of the policies within the Preferred Options Local Plan would have positive impacts when assessed against the SA objectives. It is

### **Our evidence says**

not considered proportionate or necessary to undertake a carbon impact assessment in addition to the IIA (and there is also no requirement to undertake this). The Local Plan and the IIA are considered to be in accordance with guidance on carbon impact assessment.

### **The Preferred Options Local Plan**

New policy requirements for biodiversity net gain have been added within the Preferred Options Local Plan including to Policy DM16 (Protection and Promotion of Ecology, Nature and Biodiversity).

The Spatial Strategy has been tested against a number of factors including transport impact and infrastructure requirements.

There is improved climate change resilience within the Local Plan including references to delivering net-zero carbon emissions (DM31 Net Zero Carbon Development (In operation), integrated and stand-alone renewable energy generation (Strategic Priority 1) and rainwater harvesting (DM25 Sustainable Buildings).

Strategic Priorities have been amended and new priorities added within the Preferred Options Local Plan - more details are provided in the responses to Q3.

The Preferred Spatial Strategy includes a variety of small sites, brownfield sites and larger greenfield sites – more details are provided in the responses to Q62.

## **Part 3 Vision**

This section of the consultation document proposes a high-level Vision setting out what is important for Chelmsford and how change will be managed in the future.

Key statistics:

<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
<b>2. Do you agree with the proposed new Vision? If not please give the reasons for your answer.</b>	37	24	53	114

Summary of Specific and DTC consultees comments:

- Support for the proposed Vision (Basildon Borough Council, Essex County Council, Braintree District Council, Rochford District Council, Sandon Parish Council, Broomfield Parish Council)
- Is clear, has ambition and translates well through the plan policies (Uttlesford District Council)
- Aligns with the County's plan for levelling up the County 2021-2025 - Everyone's Essex (Essex County Council)
- Add in 'healthier' in line with other council strategies and to better reflect Section 8 of the NPPF (Sport England)
- Add in 'healthier' and consider adding in 'sustainable' (Mid and South Essex Integrated Care Board (ICB))

- Should be more outward looking and reflect that Chelmsford is a city which acts as an important centre within the region (Braintree District Council)
- Recommend the plan includes greater clarity and certainty on what the vision means through a detailed suite of Strategic Priorities and/or objectives (Rochford District Council)
- Is concise, but should provide a clearer direction which embeds the Strategic Priorities and addresses the climate and ecological emergency (Anglian Water Services Ltd)
- Says very little and is too Chelmsford focused; it should refer to South Woodham Ferrers and the surrounding villages (South Woodham Ferrers Town Council)
- Amend to 'Guiding Chelmsford's adaptation and growth.....' to give a focus on preserving and improving what already exists (Great Waltham Parish Council)
- Support a Vision that amongst other matters will improve the most deprived communities, focus new development in areas with infrastructure investment and protect the highest quality agricultural land (Chignal Parish Council).

#### Summary of General Consultees Comments:

- Support for the proposed Vision (Newlands Spring Residents Association, North West Parishes Group)
- Making the best use of existing and planned transport infrastructure will be critical to achieving the new Vision (North West Parishes Group)
- Too short, vague and unmeasurable; a better Vision would be 'To lead our County as the Capital of Essex, making Chelmsford a greener, fairer and more connected community, fusing beautiful Countryside and thriving agriculture, with our vibrant and prosperous Green city.' (Save Sandford Mill Campaign).

#### Summary of Developer/Landowner/Agent Comments:

- Support/agreement for the proposed Vision - comments include it is more concise, aspirational and achievable (Taylor Wimpey, Grosvenor Property UK and Hammonds Estates LLP, London & Cambridge Properties Limited, Stonebond Properties (Chelmsford) Ltd, Dandara, Dandara Eastern, W & H Marriage & Sons Limited, Writtle University College)
- Welcome that it is more applicable to the entire Chelmsford City Council plan area (Dandara, Dandara Eastern)
- It should reflect the adopted Local Plan Vision which is clearer and more comprehensive (Pembroke Land Group, Vistry Group, Chelmsford Garden Community Consortium)
- Adopted Local Plan better reflects Chelmsford's role as a key centre (Pembroke Land Group, Rosehart Properties Ltd)
- Inadequate e.g. too brief, meaningless, lacks detail, not measurable (Rosehart Properties Ltd, Bellway Strategic, Bellway Homes Ltd, Wates Developments Limited, Edward Gittins Associates, Pembroke Land Group, Vistry Group, Richborough Estates, Hill Residential Ltd)
- Poorly reflects the proposed Strategic Priorities (Rosehart Properties Ltd, Pembroke Land Group, Wates Developments Limited)

- Not underpinned by relevant and up-to-date evidence (Bellway Strategic, Bellway Homes Ltd, Richborough Estates)
- Inconsistent/contrary to the NPPF (Bellway Strategic, Bellway Homes Ltd, Richborough Estates, Greystoke GB)
- Should acknowledge that development needs are to be met in full over the plan period (Richborough Estates)
- Expand to include 'more sustainable' to better reflect the NPPF and put sustainability at the heart of the plan (Croudace Homes)
- The Vision should refer to other settlements, not just Chelmsford City itself (Obsidian Strategic Asset Management Ltd, Hill Residential Ltd)
- Add to end of Vision '...through locally agreed Strategic Priorities.' (Wates Developments Limited)
- Alternative wording suggested to focus on making the whole Plan area more self-contained and sustainable and not simply concerned with future growth (Edward Gittins Associates)
- Various comments suggesting that their proposed development sites will accord with the proposed Vision.

Summary of Public Comments:

- Both support and disagreement for the proposed Vision
- Some support expressed for retaining/updating the adopted Local Plan Vision
- Use of 'fairer' is unclear and subjective
- 'Connected Communities' implies cars are bad but public transport is not always feasible or affordable
- Should be greater emphasis on retaining natural environments and the countryside
- Vague, meaningless and not supported by evidence
- Unclear if deliverable and what will be achieved by 2041
- Support improvements/regeneration of the city centre/town centres
- Support development of brownfield land over greenfield land
- Support economic development, jobs growth and inward investment
- Support high quality homes
- Support green initiatives and biodiversity
- No mention of the requirement to improve council efficiency and effectiveness.

<b>Our evidence says</b>
The supporting text reflects the local priorities in the Council's corporate plan <a href="#">Our Chelmsford, Our Plan</a> .
National Policy - The NPPF requires that plans provide a positive vision for the future of their area (Paragraph 15).

<b>The Preferred Options Local Plan</b>
The revised Vision is unchanged from the Issues and Options Consultation Document as it continues to be consistent with the simplified approach.

## The Preferred Options Local Plan

The Issues and Options Plan did not contain the expanded supporting text which now appears in the Preferred Options Local Plan. This covers many of the topics raised by consultees, within its supporting bullet points, including reference to South Woodham Ferrers, the regional economy, and climate change. Added emphasis has been given to sustainable and active travel, healthy living environments and economic growth.

### **Part 4 Our Strategic Priorities**

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

Key statistics:

Question	Yes	No	Comments	Total number of responses
<b>3. Do you agree with the proposed updates to the Strategic Priorities? If not please give the reason for your answer.</b>	68	26	104	198

Summary responses are listed under the Strategic Priority they relate to, followed by other comment for each consultee group. 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

Summary of Specific and DTC consultees comments:

- Support for the draft Strategic Priorities (Essex County Council, Natural England, Basildon Borough Council, Rochford District Council, Brentwood



Borough Council, Anglian Water Services, Essex Police Fire and Crime Commissioner, Mid and South Essex Integrated Care Board (ICB), Sport England, South Woodham Ferrers Town Council, Newlands Spring Residents Association, East of England Ambulance Service NHS Trust.

### **SP1**

- Recommend an additional bullet to cover a positive strategy for renewable energy generation which maximises the on site integration of renewable energy and standalone renewable energy development in suitable areas, and to refer to recent energy report (Essex County Council)
- Alternative wording suggested to deliver 'net zero carbon emissions' rather than 'move towards', to address the 2025 target for net zero (Essex County Council)
- Recommend exploring the need for new surface water infrastructure, to avoid development surface water run off to combined sewers, which Sustainable Drainage Systems (SuDS) principles do not support (Essex County Council)
- Particular support for moving towards net zero carbon emissions, and removing surface water from the water recycling network through SuDS (Anglian Water Services Ltd)
- Alternative wording suggested, to include avoiding development in areas of flood risk where possible (Environment Agency)
- The commitment to net zero should be stronger, to deliver net zero, rather than move towards it (South Woodham Ferrers Town Council)
- Supported, but reference to the provision of renewable energy schemes could be added (Braintree District Council)
- A shared challenge is access to water supply and the need to work with water companies to align growth to funding. Respect for the cross-border diminution of the aquifer sources and the fragility of related ecology is an imperative arising from both councils' focus on climate and ecological emergency (Uttlesford District Council).

### **SP1 and SP2**

- Welcomed as they reflect a greater focus on the impacts of climate change; the implications of development for the natural environment; and the objective to secure environmental gains within developments (Natural England)
- Welcomed as new Strategic Priorities (Mid and South Essex Integrated Care Board (ICB).

### **SP2**

- Support the principle of multi-functional greenways for sustainable and active travel and to contribute to health and wellbeing (Essex County Council)
- Support the proposed requirement for renewable energy in development schemes, to provide consistency across adjoining authorities. Encourage CCC to seek the highest standards beyond building regulations (Uttlesford District Council).

### **SP3**

- This should be informed by more up to date evidence on green infrastructure prepared by ECC (Essex County Council)

- Support an increase in biodiversity and ecological networks; Anglian Water has set a framework to lead in protecting and revitalising rivers, including creation the of new habitats (Anglian Water Services Ltd)
- This should be extended to minimise the loss of all agricultural land (South Woodham Ferrers Town Council)
- The available maps do not distinguish between 3a and 3b agricultural land, so it is difficult to judge the impact of this priority (Braintree District Council)
- Welcome additions to this priority. These changes reflect a greater focus on the impacts of climate change; the implications of development for the natural environment; and the objective to secure environmental gains within developments (Natural England)
- Propose adding an objective to minimise the loss of the best and most versatile agricultural land to ensure future food production (Chignal Parish Council)
- Support - small scale mobility hubs might work in the rural areas, and the planning implications of the increasing use of drones for delivery should be considered where they could help to mitigate vehicular movements and emissions, but also bring a host of issues around their storage, charging/fuelling, potential nuisance etc (Uttlesford District Council).

#### **SP4**

- Support development of previously developed land provided any land or contribution towards additional education need is met by the developer (Essex County Council)
- Developments or site allocations that are unsustainable in school transport terms will be resisted (Essex County Council)
- Seeking clarification of inappropriate development in relation to Green Belt proposals. Green Belt wording appears to have been removed from parts of the document (Galleywood Parish Council)
- Do not agree that using the settlement hierarchy will lead to the most sustainable development locations (Broomfield Parish Council)
- Protecting the Green Belt is not connected with sustainable development patterns and rules out some sustainable locations. It would be better placed in the priorities for Place group (Broomfield Parish Council)
- Protection of soil quality should also be a consideration, and developers should be encouraged to have a proactive approach to stewardship, to work with adjoining farm and estate managers on sustainable land management on land adjoining and within new development, especially for sustainable drainage control and biodiversity (Uttlesford District Council).

#### **SP5**

- CCC should engage with ECC on additional evidence on the requirements and needs for specialist and supported housing for vulnerable adults (Essex County Council)
- Support for meeting the need for new homes, although if insufficient sites are identified elsewhere the extent of the Green Belt may need to be reviewed (Braintree District Council)
- The list should also include hostels for the homeless. There should also be enforcement action to bring empty properties into occupation, alongside constructing new homes (Great Waltham Parish Council)

- Suggest collaborating on how the 20% biodiversity net gain (BNG) can be viably secured in policy and made effective by onward monitoring (Uttlesford District Council)
- Suggest inclusion of countryside protection zones around sensitive settlement locations where environmental quality is high, particularly the expansion of existing allocated sites. This is encouraged particularly approaching the Uttlesford border to help channel pressure for development in the rural areas and around Great Dunmow (Uttlesford District Council).

#### **SP6**

- A focus could be given to enhancing green skills in all jobs and sectors, including increased support for training (Essex County Council).

#### **SP7**

- Large scale employment sites could also be subject to Health Impact Assessment where appropriate (Essex County Council)
- Stewardship arrangements should go beyond management and maintenance of open spaces, and links with ECC service delivery should be explored (Essex County Council)
- Welcome the priority to encourage development to be future proofed so new homes that are sustainable and resilient to the impacts of climate change; and suggest that this priority is amended to ensure developments are water efficient as well as energy efficient (Anglian Water Services Ltd)
- The objectives should also reference education alongside health services (Great Waltham Parish Council).

#### **SP8**

- Agree with the need to address the long-term infrastructure needs for the city. Anglian Water plans and strategies aim to address the long-term needs over a 25-year time horizon. The Chelmsford Water Recycling Centre, which has a large catchment area encompassing the city and its environs, has a long-term strategy to 2050 of process optimisation and increased capacity, based on projected population growth in the catchment area (Anglian Water Services Ltd)
- Wording for provision of 'helps new primary health services' should be stronger (Galleywood Parish Council)
- Greater recognition should be given to the East of England Ambulance Service NHS Trust as an essential social infrastructure provider and emergency service (East of England Ambulance Service NHS Trust).

#### **SP9**

- Concern that increased use of permitted development rights will lead to a reduction in design quality, and reduce potential for mitigation measures and developer contributions, particularly in relation to education (Essex County Council)
- A recognition could be included that changes in city centre retail mean that regeneration is no longer a sound strategy (Great Waltham Parish Council).

#### **Other comments**

- Anglian Water's strategic direction is to address challenges of climate change, population and economic growth, and to protect the environment (Anglian Water)
- More detailed objectives with clear targets would be welcomed as the review progresses to ensure clarity over the level of ambition (Rochford District Council)
- The title Priorities for Climate should be changed to Priorities for Climate and the Environment, to reflect the broader remit, e.g. including landscape (Broomfield Parish Council).

Summary of General Consultees Comments:

### **SP7**

- Should also consider ensuring that new development helps provide new/enhanced sports facilities and opportunities for physical activity as they are as important as primary health services in promoting the health and social wellbeing of communities (Sport England).

### **Other comments**

- Grouping the Strategic Priorities into themes distorts the wording. Some aspects appear not to fit with the overall theme, and lack focus - additional text is needed. Should revert to an un-prioritised list. There may be additional themes of importance. Detailed notes are provided for a suggested rewrite and reorganisation of this section (Save Sandford Mill Campaign).

Summary of Developer/Landowner/Agent Comments:

- Agree with the draft Strategic Priorities (Rosehart Properties Ltd, Taylor Wimpey, Martin Grant Homes, London and Cambridge Properties Ltd, Pembridge Land Group, Vistry Group, Wates Development Limited, Dominvs Group, Obsidian Strategic Asset Management Ltd, Dandara, Dandara Eastern, Gray & Sons, Grosvenor Property UK and Hammonds Estates LLP, Redrow Homes and Speakman Family, Marden Homes Ltd, Sempra Homes Ltd, Mr A Smith, Stonebond (Chelmsford) Ltd, Bloor Homes Eastern, A.G & P.W.H Speakman, Chris Buckenham, Cliffords Group Ltd, David Lloyd Leisure and Aquila Development Ltd, The Bucknell Family, Cliffords Group and Mr Mark Peters, Hill Farm (Chelmsford) Ltd, C J H Farming Ltd, Pigeon (Sandon) Ltd, Writtle University College).

### **SP1**

- New residential development should be focused on Chelmsford Urban Area and adjoining land (Martin Grant Homes)
- Suggest addition of a further bullet point covering the need to ensure that new development be delivered in the most suitable and sustainable locations to assist with mitigating the impacts of climate change, through providing development opportunities that allow existing communities to continue to grow and support the growing population (Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern) Ltd, Martin Grant Homes)
- Support this, and suggest the Council should support opportunities to promote tree planting as part of a robust environmental strategy (Cliffords Group Ltd)

- Suggest this draws greater reference to the positive relationship between strong, local economic growth and sustainability / climate change benefits; suggest an additional bullet point promoting the benefits of economic growth, local jobs and travel and sustainable lifestyles (Pigeon (Sandon) Ltd)
- Should clarify that one Strategic Priority does not take precedence over another but that they are used mutually (Bellway Homes Ltd).

## **SP2**

- Agree with this priority, however it is important that the housing need is properly calculated (London and Cambridge Properties Limited)
- Support the intention to address the housing demand and supply, however viability challenges should be considered, given the current economic environment (L & Q)
- Would encourage the inclusion of opportunities to locate new economic development close to the existing road network, such as the A12 at Margaretting. The locational requirements of different sectors should be recognised and addressed (Gray & Sons)
- This should also seek to encourage the distribution of development towards planned strategic infrastructure, for example the Chelmsford Northeast Bypass route and the opportunities this unlocks (Cliffords Group Ltd)
- Suggest adding a further bullet that recognises that development requiring road movements (e.g. logistics/distribution) should be located close to the strategic road network to reduce impact on local roads and communities (Pigeon (Sandon) Ltd).

## **SP3**

- It is imperative that employment and the economy is supported in other settlements as well as Chelmsford (Obsidian Strategic Asset Management Ltd)
- Areas of low ecological and biodiversity value, including within the Green Wedge, may be better utilised for alternative development which should be sought through the Local Plan (The Bucknell Family)
- This fails to take into account the recommendations and commitments within the Chelmsford Economic Strategy and does not include or recognise the role of education providers, such as Writtle University College (WUC). WUC is an important local employer, anticipated to increase as a result of the implementation of a new Strategic Plan to 2030 (Writtle University College).

## **SP4**

- Particularly support the focusing of previously developed land in the Chelmsford Urban Area (Essex Police Fire and Crime Commissioner)
- Urge review of Green Belt to avoid distorted settlement growth pattern (Rosehart Properties)
- There should be an appropriate review of the Green Belt to identify suitable development locations and avoid a distorted settlement growth pattern (Rosehart Properties, Pembridge Land Group, Martin Grant Homes, Dandara, Taylor Wimpey Strategic Land)
- The Council should take full account of sustainable development opportunities on the edge of the city, even if they are in the Green Belt – to realise key infrastructure and provision of housing close to where the need arises, close

to key services and sustainable travel options (Vistry Group); and for economic growth (Gray & Sons); and to achieve sustainable development across the plan area (Hill Residential Ltd)

- Should seek the sustainable distribution of development across Chelmsford utilising strategic road infrastructure (Cliffords Group Ltd)
- Suggest including further emphasis on the need to support rural communities through the provision of sympathetic small scale residential development, to allow villages to grow and thrive to support local services (Cliffords Group Ltd)
- Minerals, waste and marine plans already form part of the development plan and do not need further reference. Minerals safeguarding designation should not be seen as a constraint, but can be extracted and used as part of future development (Martin Grant Homes, Stonebond (Chelmsford) Ltd)
- An additional priority for growth should be added to pursue opportunities to enhance the sustainability of existing settlements, and identify opportunities for villages to grow and thrive, especially where this will support local services (Croudace Homes)
- Strongly supported, however this could be improved through clarification that the Council will plan positively to meet the objectively assessed needs (Bellway Strategic, Bellway Homes Ltd, Gleeson Land)
- Would issue caution against over reliance on the Settlement Hierarchy, and recommend a flexible approach to the location of housing (H R Philpot & Sons, Chris Buckenham).

#### **SP5**

- This should go further and specifically identify groups that fall into the term specialist, e.g. older people's housing. The population of older people will increase by 2043 (The Planning Bureau)
- This would benefit from clarification of specific groups and their specific housing requirements; and also, could refer to the imperative to secure an appropriate housing mix which includes affordable housing provision (Bellway Strategic, Bellway Homes Ltd); and older people's housing (The Planning Bureau, Inspired Villages)
- Affordability of housing merits an additional bullet point to address the worsening affordability of homes in the Chelmsford area (Tritton Farming Partnership, Mr and Mrs Richard and Sally Speakman, Medical Services Danbury, Marden Homes Ltd, Crest Nicholson, Sempra Homes Ltd)
- This should refer to the importance of rural communities, and the need to promote sustainable development in these areas where it will enhance or maintain their vitality (Mr and Mrs Richard and Sally Speakman)
- Suggest an additional bullet to clarify that evidence documents will continue to be prepared across the Plan period, which development should accord with (e.g. on dwelling mix, affordable tenure, need etc) (Bellway Homes Ltd)
- Agree that housing delivery is strongly related to economic growth and will inform the economic strategy of the new Local Plan (Gray & Sons).

#### **SP6**

- To be fully effective, a review of the Green Belt is required (Rosehart Properties, Pembridge Land Group)
- Suggest amending third bullet to reference local and wider strategic needs (Greystoke CB)

- Support, and consider this will help to maintain and diversify the supply and choice of employment provision in both the urban and rural areas of Chelmsford (Hylands Construction Company Ltd, C J H Farming Ltd)
- Suggest expanding this to include the rural economy and the scope to support and promote small-scale rural business appropriate to the countryside (Cliffords Group Ltd); and to help further maintain and diversify the supply and choice of employment provision in both the urban and rural areas of Chelmsford (Hill Farm (Chelmsford) Ltd)
- This should recognise that some flexibility is required, where employment land is shown to be surplus to requirements, some current policies are out of date (Bellway Homes Ltd).

#### **SP7**

- ‘Strategic scale developments’ should be defined to provide clarity on the scale of development where masterplans and design codes will be sought, which could then be captured in site allocation policies with some flexibility to allow removal of the need for a design code (Bellway Homes Ltd).

#### **SP8**

- This should include an aspiration to ensure that services and facilities are delivered where needed to support the creation of sustainable communities (Bellway Strategic)
- The new Local Plan should be supportive of the need to bring forward development to facilitate the delivery of social infrastructure, where it is sustainable and appropriate (Miscoe Enterprises Ltd)
- Support the recognition that the new Local Plan will promote opportunities for new sustainable infrastructure, however this priority could be strengthened to include explicit reference to green infrastructure, such as open space, recreational areas and leisure (Cliffords Group Ltd)
- This would benefit from recognising that other means exist to support the provision of new infrastructure including planning obligations and Community Infrastructure Levy receipts (Bellway Homes Ltd).

#### **SP9**

- This neglects the needs of smaller settlements to retain vital services. Modest housing growth should be supported in smaller settlements including those within the Green Belt (The Howgego Trust).

#### **Other Comments**

- Consider there is a mismatch between the Vision and the Strategic Priorities (Pembroke Land Group)
- Consider there is a missed opportunity to strengthen the relationships between SP2, SP4, SP5, SP6 and SP8. Priorities 2 and 8 should permeate throughout all of the Strategic Priorities, where relevant, as a means of recognising the importance of strategic road infrastructure to delivering sustainable new development. All the priorities should also promote the advantages of locating development close to existing strategic road infrastructure (Mr Alexander Micklem)
- SP7, SP8, SP9 are somewhat ambiguous and could be clarified. Design expectations should be related to Making Places SPD (Bellway Strategic)

- The priorities should remain flexible to avoid stifling development which may not fit with a specific priority but may be sustainable on balance (Gleeson Land)
- It is imperative that aspirations to secure net zero carbon development, are balanced against the city's need for growth. The Council should not be overly prescriptive but should support the uptake of low and zero-carbon technologies and protection of the best and most versatile agricultural land only where this is appropriate and justified (Bellway Strategic)
- Development being delivered as part of the North Chelmsford strategic allocation is expected to be supported by the required services to ensure sustainable development is achieved - land immediately adjacent could also be delivered in line with Strategic Priorities (Marden Homes Ltd, Mr A Smith)
- Suggest a greater emphasis is needed on further and higher education and its importance in helping to meet the skills needs of employers and industry (Writtle University College).

#### Summary of Public Comments:

##### **SP1**

- This should reflect that open, unmanicured grassland and arable land also support a range of flora and fauna not found in woodland
- Propose a text change – to identify and anticipate the impacts of climate change, instead of adapting to its consequences.

##### **SP2**

- Additional wording is proposed to include reference to the most efficient use of fossil and alternative fuelled vehicles.

##### **SP3**

- This should be stronger – to prohibit loss of best and most versatile agricultural land, rather than minimise – and farmland should be protected
- Should reflect that open, unmanicured grassland and arable land also support a range of flora and fauna not found in woodland
- Suggest this is split into two priorities - for natural environment and historic environment. There is a need to deliver on biodiversity net gain (BNG), based on local wildlife and plant surveys rather than theory.

##### **SP4**

- Previously developed land also exists in villages around Chelmsford, and some smaller settlements are also more sustainable than those where development is taking place
- Protection of the Green Belt is not supported, as at this stage not satisfied there are strong reasons to preserve the current Green Belt extent. Some land could be released to allow sustainable development
- This should go further to protect green open rural farmland as well.

##### **SP5**

- This should include social housing



- The Council should address the needs of existing Chelmsford residents as a priority, concern expressed about creating new communities at the expense of the older ones
- Local young people wishing to buy a home are routinely priced out of Chelmsford and have to buy miles away, cutting them off from their established social networks; the Council should look to how to remedy this.

#### **SP6**

- There should be a strong focus on jobs, with lower business rates for new independent companies, and also attract a large corporation.

#### **SP7**

- Spatial Approach E is incompatible with this Strategic Priority, as it builds on green field and does not reflect the settlement hierarchy, and therefore requires extensive infrastructure development
- This should make specific reference and provision for young people - social facilities such as Youth Zones. Although new, Beaulieu and Channels developments appear to lack such facilities
- Suggest adding build quality to the design objective
- Strengthen wording to make the specific point that 'isolated' developments are the least-favoured approach to development, as opposed to growing and adding on to existing developments/villages/towns.

#### **SP8**

- This should acknowledge smaller communities and those that border Chelmsford's area
- This should encourage a greener city, and stricter application of planning requirements.

#### **SP9**

- Chelmsford lacks the types of venues required for cultural events - e.g. multi purpose halls for exhibits of all kinds; designated gallery space; space for amateur dramatics and concerts. The Shire Hall is still empty and surely must be considered for repurposing for cultural use
- Needs to be amended to apply to Chelmsford area as a whole, not just the city centre.

#### **Other comments**

- Support the updated Strategic Priorities – they are stronger, clearer and better focused
- Delivery of infrastructure cannot be left to developers and is a consistent problem
- There is a mismatch between the predicted needs for Electric Vehicle (EV) charging and provision
- Concern that items from the adopted Local Plan cannot be achieved, such as upgrading the rail network, road improvements, health facilities
- Improvements to biodiversity need to work from a baseline of protecting current species and habitats. Sites should not be stripped of ecological value
- All Spatial Approaches must consider transport infrastructure, water, sewage and power supplies

- How can success be measured, very few measurable outcomes
- Sustainability should have a higher priority than other Strategic Priorities
- Money should be spent on improving housing in the city centre, on people who require help, and policing
- Disagree there is a climate emergency. Question the need for additional housing
- Recent development at Rettendon is accessed via the Green Belt; along with residential units at Hayes Country Park in the Green Belt
- The Strategic Housing and Employment Land Availability Assessment (SHELAA) mapping shows a number of sites in the Green Belt
- The A130 has no junction to Rettendon Common between Howe Green and Rettendon Turnpike, so it is doubtful whether this should be termed a main road corridor. Improvements to the A132/B1012 will be welcomed
- Little information given on how and when the required infrastructure would be provided
- The Green Belt should be protected from development
- 145 homes have already been allocated in Boreham under the Local Plan
- Growth should be close to the city centre to make use of highways networks and community links. The strategic approaches will conflict with the Strategic Priorities; agricultural land would be lost to Approach E; Approach E would remove trees rather than provide an increase in woodland expansion; Hammonds Farm has no infrastructure or sustainable transport.

#### **Our evidence says**

The Water Cycle Studies 2024 recommend rainwater harvesting for water re-use as set out in Policy DM25 (Sustainable Buildings). This policy also reflects Essex and Suffolk Water’s latest draft Water Resources Management Plan 2024 and the emerging Essex County Council’s Essex Water Strategy. Further recommendations in the reports will inform updates to the Making Places SPD and the Pre-Submission Local Plan.

Report 2: Essex Net Zero Policy, and the Essex Design Guide 2023, sets out design guidance and advice which underpins Policy DM31 (Net Zero Carbon Development (In operation)). This guidance has been developed through joint working between Essex Planning Officers Association, ECC and a number of Essex authorities, including Chelmsford City Council.

National Policy - The NPPF in Section 13 sets out Green Belt Policy, which is reflected in the Preferred Options Local Plan.

National Model Design Guide and Code – these set out the characteristics of well-designed places and demonstrate what good design means in practice. Regard has been had to the Guide and the Code, which will also be used to inform an update of the Making Places SPD.

The Preferred Options IIA 2024 considers that very few incompatibilities are identified. The Strategic Priorities are particularly compatible with the IIA objective of sustainable living and revitalisation, housing, the economy and transport, and also supportive of biodiversity, health and wellbeing, land use, cultural heritage and landscape. Any conflicts/uncertainties generally relate to the need to protect and enhance environmental assets and minimise resource use, waste and greenhouse gas emissions, when balanced against the priorities for growth.

## Our evidence says

The Health Impact Assessment carried out as part of the IIA 2024 concludes that none of the policies are identified as having the potential to have significant negative effects on the HIA objectives.

The Council's [Plan for Improving Rivers and Waterways](#) 2022 (Item 7 on Agenda available via the link) contains a number of actions which underpin the Preferred Options Local Plan.

The Chelmsford Local Plan Viability Update 2023 supports a 20% biodiversity net gain on the two Garden Communities proposed within the Preferred Options Local Plan. It also sets out the reasoning behind the approach retain a requirement for a minimum of 10% biodiversity net gain, while feasibility for a higher amount is being explored on all other eligible developments.

The Chelmsford Local Plan Viability Update 2023 supports the new policy requirement for rainwater harvesting in updated Policy DM25 (Sustainable Buildings).

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Strategic Priority 1 – has been amended from the draft to include references to delivering net-zero carbon emissions, integrated and stand-alone renewable energy generation and water efficiency.

Strategic Priority 2 – references have been added to mobility hubs, accessibility, and multi-functional greenways.

Strategic Priority 4 – no review of the Green Belt is proposed; the Green Belt will continue to be protected from inappropriate development. It is considered that the purpose of the Green Belt is clear within the Preferred Options Local Plan, as set out in Strategic Priority 4 and Strategic Policy S1 (Spatial Principles).

Strategic Priority 6 – updates position including on employment levels, which are covered in more detail in Section 2 of the Preferred Options Local Plan.

Strategic Priority 7 – clarification is provided on the thresholds for Design Codes.

Strategic Priority 8 – emergency care has been added to other types of healthcare provision.

Strategic Priority 9 – reference is included to the Council's [Plan for Improving Rivers and Waterways](#) (Item 7 on Agenda available via the link).

Some suggested bullets are not covered in the Strategic Priorities due to the level of detail required, but are contained within the development management policies, including renewable energy generation in Policy DM19 (Renewable and Low Carbon Energy), Sustainable Drainage Systems in Policy DM18 (Flooding/SuDS), water efficiency in Policy DM25 (Sustainable Buildings), types of housing provision in Policy DM1 (Size and Type of Housing) and DM2 (Affordable Housing and Rural Exception Sites), and green infrastructure, open space and sports facilities in Strategic Policy S9 (Infrastructure Requirements).

The Preferred Options Local Plan seeks to minimise the loss of the best and most versatile agricultural land, which is balanced against sustainability and general suitability of a location for development. High quality green infrastructure will be provided on greenfield sites to protect, enhance and create wildlife corridors and ecological connectivity.

Stewardship is a requirement of the two garden communities within the Preferred Options Local Plan, at Strategic Growth Site Policy 6 (North East Chelmsford – Chelmsford Garden Community) and Strategic Growth Site 16a (East Chelmsford

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Garden Community (Hammonds Farm)); and within all strategic scale development (100 or more homes) as set out in Strategic Policy S14 (Health and Wellbeing).
The requirement to deliver 20% biodiversity net gain is a requirement of the new Garden Communities (Strategic Growth Site Policy 6 North East Chelmsford – Chelmsford Garden Community and Strategic Growth Site 16a East Chelmsford Garden Community Hammonds Farm).
The requirement to deliver biodiversity net gain is currently remaining at a minimum of 10% increase in biodiversity for all other eligible developments to ensure it is deliverable.
HIA is required for large employment sites, as set out in Strategic Policy S14 (Health and Wellbeing).
Tree planting is a priority for the Council, and additional policy requirements have been added to Policy DM17 (Trees, Woodland and Landscape Features).
Locational issues are addressed by the Spatial Principles in relation to, for example, an approach to site development along transport corridors, or for small scale development in villages.

Key statistics:

<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
<b>4. Are there any Strategic Priorities you think should be added?</b>	N/A	N/A	37	37

Summary of Specific and DTC consultees comments:

- Heritage at Risk (HAR) - heritage assets that are a risk as a result of neglect, decay, damage or inappropriate development, or are vulnerable to becoming so. Chelmsford has three on the national Register, but we would encourage consideration of creating and managing a local HAR Register. Further detail is provided on options for policy approaches (Historic England)
- Encouragement of more diverse and sustainable agriculture – more agricultural land is needed to increase self-reliance and cut food miles to achieve climate goals (South Woodham Ferrers Town Council)
- Every house should have solar power, water harvesting etc – for all house building whether individual or large developments (Sandon Parish Council)
- The role of waterways (including the River Crouch) to address the challenges of coastal communities (Rochford District Council)
- The importance of protected habitat sites and heritage assets (Rochford District Council)
- Consideration of complete communities or 20 minute neighbourhoods to address spatial differences in infrastructure provision and life outcomes (Rochford District Council)
- Priorities for cross boundary planning, including for infrastructure (Rochford District Council)

- Scope to take action on empty homes, thereby reducing the number of homes needing to be built using the powers and incentives which exist (Great Waltham Parish Council)
- Greater protection for the Green Belt and other areas of special designation (Writtle Parish Council).

#### Summary of General Consultees Comments:

- A Strategic Priority specifically related to flood risk (Save Sandford Mill Campaign)
- A need to work with relevant third parties in the assessment of planning matters - dismissing these parties as "special interest groups" and not consulting with them directly is short sighted and deeply flawed (Essex Badger Protection Group).

#### Summary of Developer/Landowner/Agent Comments:

- The vital role of Chelmsford as the Capital of Essex. It is important to recognise the legacy of Chelmsford as a hub of the electronics, communications, defence and other innovatory industries and that current and new investment in these sectors should be strongly encouraged and not lost to competing locations outside Chelmsford (Rosehart Properties)
- Promote and encourage the Circular Economy by making best use of what already exists and recycling land and buildings to meet future needs and regenerate nature (Rosehart Properties, Pembridge Land Group)
- Make the maximum use of brownfield land for new development (London and Cambridge Properties Ltd)
- Ensure the vitality and viability of other settlements within Chelmsford, to enable them to grow and support the retention of existing services, including sensitively selected Green Belt release (Obsidian Strategic Asset Management).

#### Summary of Public Comments:

- Water should feature – a range of measures suggested including new reservoirs, expanding treatment works, protecting rivers, improving river health
- Commitment to funds and plans, and clear priorities to achieve all transport infrastructure (not just road), water, sewage and power supplies; Community Infrastructure Levy (CIL) will not cover the costs
- More emphasis needs to be put on protecting the natural environment which is already under great stress
- Promote development of previously developed land in Chelmsford Urban Area and in/around village settlements including sustainable smaller settlements
- Maintaining the essence of Chelmsford as a city surrounded by villages
- Improving air quality
- Protecting food security by maintaining farmland.

### **Our evidence says**

The Preferred Options Local Plan has been informed and supported by a number of evidence base studies including the Preferred Options Strategic Housing Needs Assessment (SHNA), Employment Land Review 2023, Water Cycle Studies 2024 and Strategic Flood Risk Assessments 2024. The evidence base has assisted in developing the Strategic Priorities in the Preferred Options Local Plan.

### **The Preferred Options Local Plan**

No additional Strategic Priorities are considered necessary, as the amended versions cover the detailed topics raised in a broader sense, with the detail reserved for development management policies.

## **Part 5 Delivering the updated Vision and Spatial Principles**

This section of the consultation document takes each of the updated Strategic Priorities and describes how they are addressed through policies in the adopted Local Plan and other council planning documents. It then sets out ideas for proposed policy changes and new policies.

### Strategic Priorities for Climate

#### 1 Addressing the Climate and Ecological Emergency

Key statistics:

<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
<b>5. Do you support the approach being taken? If you disagree, please explain why.</b>	39	11	40	90
<b>6. What are your views on the Council's current climate change and flood risk local planning policies and the decisions they lead to?</b>	N/A	N/A	38	38
<b>7. What are your views on the subject areas identified for new policies or significant changes to existing policy?</b>	N/A	N/A	52	52
<b>8. Have we missed anything? Where possible, please support your answer with reference to any evidence.</b>	N/A	N/A	32	32

Summary of Specific and DTC consultees comments:

- Support the strategic objectives related to the achievement of net zero development, enhanced tree planting and 20% biodiversity net gain (BNG) (Environment Agency, Castle Point Borough Council)
- Support this strategic priority but it is not clear how any of the sub-heading priorities in para 5.10 will address the “ecological emergency” (Natural England)
- Support reviewing the policies so that they more effectively address issues associated with climate change (Braintree District Council, Anglian Water)
- Supports the plan addressing climate issues but that the issue should be given weight within each of the other priorities, as opposed to being a standalone and definable priority in its own right (Rochford District Council)
- The role of Chelmsford as a regional centre for employment, retail and leisure should be secured sustainably through appropriate investment in lowering the carbon intensity of regional transport links (Rochford District Council)
- Consider a policy requirement for major development proposals to be informed by whole life cycle carbon assessments to support positive outcomes that align with the proposed strategic priorities (Anglian Water Services Ltd)
- Support the new ‘Strategic Priorities for Climate’ as these are largely consistent with the aims of the independent Essex Climate Action Commission (ECAC) and the ECC Safer Greener, Healthier Communities campaign (Essex County Council)
- ECC offer support to CCC in developing policies that deliver true net zero carbon development in operation and also address embodied carbon emissions (Essex County Council)
- Central Government need to lay out a more detailed roadmap and provide the legislation to back it up rather than rely on individuals to make more sustainable choices (South Woodham Ferrers Town Council)
- Do not believe the proposed responsibility should be passed onto Parish Councils, as set out in para 5.6 (Galleywood Parish Council)
- Welcome the reference to Parishes in para 5.6 and are keen to contribute to addressing the climate and ecological emergency (Broomfield Parish Council, Chignal Parish Council)
- Policy DM18 – Flooding/SuDS should be reviewed against the recently updated Planning Practice Guidance (PPG) - Flood Risk and Coastal Change (August 2022) (Essex County Council)
- Support for setting a framework to reduce water use and promote water re-use, reflecting the emerging Essex Water Strategy (EWS) is supported. Recommend consideration is given to the Water Resources Regional Plan being prepared by Water Resources East (WRE) (Essex County Council, Anglian Water Services Ltd)
- All water company areas in East Anglia have been determined as water stressed. Therefore, Local Planning Authorities (LPAs) should require all developments to adopt the optional minimum building standard of 110 litres per person per day. There should also be an ambition to further reduce the per person per day consumption within new developments e.g. consider setting standards for water consumption of individual components, such as toilets/showers (Environment Agency)

- Assessment and mitigation of risk to the water environment generated by increased wastewater flows requiring treatment should be included in the infrastructure or the natural environment section (Environment Agency)
- Agree with the approach but would like a greater emphasis on climate change and flood risk in local planning policies and decisions (Writtle Parish Council)
- The Local Plan should make explicit mention of projected seawater rise and the need to ensure appropriate flood defences are in place for the town (South Woodham Ferrers Town Council)
- Measures to retrofit existing buildings should be considered (Broomfield Parish Council)
- There needs to be careful thought given to tree management and positioning regarding street lined trees and their compatibility with the highway and other surroundings (Essex County Council, Great Waltham Parish Council, South Woodham Ferrers Town Council)
- It is important to protect the best agricultural land in order to maintain sustainable food supply chains (Broomfield Parish Council, Chignal Parish Council)
- The protection of Green Wedges can hamper cycle and walking routes being achieved. It is suggested that Compulsory Purchase Orders could be used to assist in completing infrastructure projects such cycle lanes within a shorter timescale (Broomfield Parish Council)
- ECC is keen to work collaboratively with CCC on a countywide assessment to identify potential areas of land which could be suitable for solar and wind schemes and how it might be used to feed into the next iteration of the Local Plan and the SHELAA process (Essex County Council)
- Community scale renewables should be required by all developments in para 5.10 and should also include reference to battery energy storage systems (Great Waltham Parish Council)
- Prefer a requirement for all new development to include climate-friendly features (e.g. PV panels and small scale turbines) rather than large sites for renewable energy generation (Broomfield Parish Council)
- Land should be allocated to recycling materials and re-processing plants (Great Waltham Parish Council)
- Policies need to be reviewed to deal with the impact on the historic environment (Writtle Parish Council).

#### Summary of General Consultees Comments:

- Support for the approach set out (Newlands Spring Residents Association)
- Active travel should be embedded into the policies that address climate change as it forms part of the policy response to climate change rather than being a separate planning matter (Sport England)
- A line should be drawn under habitat loss first and then consider other options for enhancement (Essex Badger Protection Group)
- Obtaining 20% BNG may often not be achievable and may impact on viability (L&Q)
- It is important to protect the best agricultural land in order to maintain sustainable food supply chains (North West Parishes Group)
- Agree with the suggestions but question how old planning permissions will be addressed to meet these requirements as well as a gap between current



building regulations and likely Future Homes requirements that needs to be considered (CHP)

- The PPG reflects that building regulations are the mechanism through which energy efficiency and carbon emissions as part of a building's use should be addressed and not planning policy (Home Builders Federation)
- Supportive but needs to be flexibility within any policy for small-scale renewable energy to allow the appropriate strategy to be designed on a site-by-site basis (L&Q)
- Question the practicality of three trees per new home, particularly regarding how it would work for flats and suggest an off-site provision as an alternative where impractical (CHP).

#### Summary of Developer/Landowner/Agent Comments:

- General support for the need to address the climate and ecological emergency but there is a need to ensure such policy requirements, alongside all other development requirements, are fully evidenced, financially viable as well as flexible where things cannot be delivered on site (London & Cambridge Properties Ltd, Aquila Developments, Taylor Wimpey, Dandara, Ptarmigan Chelmsford A Ltd, Stonebond Properties Ltd, Bloor Homes, Dandara Eastern, Greystoke CB, Hill Residential Ltd, Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern), Gleeson Land, Bellway Homes Ltd, Chelmsford Garden Community Consortium, Gladman Developments Ltd, Bellway Strategic, Graham Dines)
- There is a need to ensure policies are sufficiently flexible so as to not be at risk of becoming inconsistent with forthcoming changes to national policy and changes to building regulations (Wates Development, Bellway Homes Ltd)
- Supports the Councils objectives of reducing carbon emissions and targeting net zero by 2030 but this commitment presents challenges e.g. many of the technologies required to achieve net zero have not yet been identified and therefore are unlikely to be in place before 2030 (Chelmsford Garden Community Consortium, Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern))
- Strategic Policy S2 lists a range of measures to reduce a developments carbon footprint but is not overly prescriptive. Continued flexibility across any new policies would be welcomed as it allows flexibility and can be applied across all types of new development (Chelmsford Garden Community Consortium)
- Support the approach in this section (Grosvenor Property UK and Hammonds Estates LLP, Harris Strategic Land Ltd, Rosehart Properties Ltd, Pembridge Land Group, Persimmon Homes, Gleeson Land)
- Energy efficiency should be prioritised over the use of renewable energy to ensure that the energy requirement of any development is reduced as far as possible before renewable energy is designed into the scheme (Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern))
- Requirement for all new development to include small-scale renewable energy on site, alongside requirement of three new trees per home is not supported as it may impact deliverability (Bellway Strategic)
- Question the practicality of three trees per new home on site and new development should not have to source land for this from elsewhere, a qualitative design-led, site by site approach should be used instead (Bellway Homes Ltd, Gleeson Land)

- No assessment of the cumulative impact of planting three trees per home in tandem with BNG requirements has been carried out and it could represent doubling up (Bellway Homes Ltd)
- Policies to increase tree planting should go beyond residential development and reference net gain of tree planting from development and focus on good design, rather than an arbitrary number (Dominvs Group)
- Support for new allocations for tree planting (Cliffords Group Ltd)
- Going beyond Future Homes Standard, expected to be incorporated into building regulation requirements, is not supported (Gleeson Land, Bellway Homes Ltd, Bellway Strategic)
- Building Research Establishment Environmental Assessment Method (BREEAM) alternatives need to be explored given the issues which have been identified in connection with commercial schemes (Aquila Developments Ltd)
- The aims and aspirations of the Council's Waterways Working Group should be reflected in the policies, particularly regarding infrastructure provision (Vistry Group)
- Inadequate consideration given to the flood risk dangers to the city centre, and the opportunities for enabling development to facilitate the provision of key infrastructure that will alleviate flood risk (Vistry Group)
- Prioritise development near the new Railway Station to assist in reducing carbon emissions through travel (Chelmsford Garden Community Consortium).

#### Summary of Public Comments:

- Strategic Policy S2 should be divided into separate policies on flood risk and climate change, as flood risk exists independently of climate change and combining the two understates the importance of sound planning policy to mitigate flood risk in new and existing development
- Support in principle but needs to be much stronger in terms of the requirements e.g. requiring new homes to all be net zero carbon
- Agree with the approach but question if it is achievable
- More detail is needed on how the suggested policies could be achieved, some areas lack commitment to specific actions
- More needs to be done on these issues at a cross-border level with neighbouring authorities
- There appear to be contradictions e.g. protecting the natural environment but building extensively on green space
- Strongly disagree that such requirements could adversely affect development viability as such homes would surely command a premium value
- Disagree that there is a climate emergency
- All new houses and Council buildings should be required to have solar panels installed
- All homes should be well insulated
- The Council needs to do more regarding recycling a greater number of household products like TerraCycle does
- Heritage Assets need to be considered alongside this issue

- Support for new tree planting but concern over tree lined streets having maintenance issues and that tree planting should not be at the expense of other habits
- Sustainable modes of transport do not take into account the lifestyle of most residents or how most families live
- Light railway systems should be considered
- Active modes of transport need to be safe to use and well-lit
- There should be no building on flood plains or areas which worsen flood risk
- Rainfall and flood risk needs to be considered as a cross boarder issue with other authorities
- Developments should be required to consider the wider impacts of flood risk, water run-off etc and not just within their site
- Additional on and off-site water storage and recycling needs to be considered
- Sea level rise has not been considered.

<b>Our evidence says</b>
<p>The Preferred Options IIA 2024 focuses on sustainable development through a number of inter-related topics. Policies to address the climate and ecological emergency would make a positive contribution to a number of the IIA objectives, with significant positive effects on biodiversity, flood risk and climate change.</p>
<p>Evidence behind Policy DM31 (Net zero carbon development (In operation)) supports the requirement for certain forms of development to be net zero carbon, in operation. The Local Plan Viability Update (August 2023) shows this can be achieved in combination with other policy requirements.</p>
<p>The Water Cycle Study Reports 2024 recommend rainwater harvesting for water re-use as set out in Policy DM25 (Sustainable Buildings). This policy also reflects Essex and Suffolk Water’s latest draft Water Resources Management Plan 2024 and Essex County Council’s emerging Essex Water Strategy. Further recommendations in the reports will inform updates to the Making Places SPD and the Pre-Submission Local Plan.</p>
<p>The SFRA Level 1 2024 report provides recommendations regarding all sources of flood risk in the Chelmsford City Council’s administrative area which can be used to inform policy on flood risk within Local Plans. This includes how the cumulative impact of development should be considered. It also provides the latest flood risk data and guidance to inform the Sequential Test and provides guidance on how to apply the Exception Test. The SFRA Level 2 2024 assessment 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 risks to the site. From this, CCC and developers can make more informed decisions and pursue development in an effective and efficient manner. The Level 2 assessment also identifies sites for further risk analysis at the site-specific Flood Risk Assessment (FRA) stage.</p>
<p>The Local Plan Viability Update 2023 shows at least 10% biodiversity net gain and three new trees per net new dwelling can be achieved in combination with other policy requirements. The garden community allocations will be required to achieve 20% biodiversity net gain.</p>
<p>The majority of the agricultural land in Chelmsford is either Grade 2 or 3. The Best and most versatile agricultural land is classified as Grades 1-3a. The Preferred Options Spatial Strategy promotes development on previously developed sites.</p>

## Our evidence says

However, as the identified development needs cannot be accommodated solely on previously developed land, the loss of some agricultural land to development is inevitable. The Preferred Options Local Plan would lead to a loss of approximately 853 hectares of Grade 3 agricultural land and approximately 246 hectares of Grade 2 land. This equates to around 2.4% of the total Grade 2 and around 4.2% of the total Grade 3 land in the plan area, although further site-specific assessments are needed to determine the split between Grade 3a and 3b.

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Sustainability is addressed in the supporting points to the Vision.

Addressing climate change is woven into the Preferred Options Local Plan throughout. The preferred Options Climate Change Topic Paper sets this out in more detail.

Strategic Policy S2 (Addressing climate change and flood risk) and Development Management Policy DM31 (Net Zero Carbon Development (In operation)) introduces the need for new development to be net zero carbon in operation.

Strategic Policy S2 (Addressing Climate Change and Flood Risk) and Development Management Policy DM18 (Flooding/SuDS) have been updated to reflect latest national policy guidance.

Strategic Policy S2 (Addressing Climate Change and Flood Risk) and Development Management Policy DM25 (Sustainable Buildings) requires all new dwellings to meet the Building Regulations optional requirement for water efficiency of 110 litres/person/day.

Strategic Policies S4 (Conserving and Enhancing the Natural Environment) and S9 (Infrastructure Requirements) identifies the need for waste water discharge and treatment to be factored into infrastructure required to support development. Existing sites rolled forward from the adopted Local Plan in Great Leighs, where there is a need for timely improvements to be made to the waste water recycling centre, requires appropriate waste water treatment provision and disposal is available in time to serve the site, including any associated sewer connections and any required mitigation within the sewerage network.

The Essex and Suffolk Shoreline Management Plan aims to reduce the threat of flooding and erosion to dwellings, key infrastructure and tourism facilities along Chelmsford's coastal fringe around South Woodham Ferrers.

The Marine Management Organisation (MMO) South East (Inshore) Marine Plan also includes land to the south of South Woodham Ferrers. The Marine Plan's jurisdiction overlap with the Council's responsibilities (which extend to mean low water) and due regard must be given to the Marine Plan. The South East (Inshore) Marine Plan, must be considered alongside the Local Plan, to provide a consistent approach for planning on land, and within the inter-tidal and marine environment. This is set out in the Preferred Options Local Plan.

Strategic Policy S2 (Addressing Climate Change and Flood Risk) and Development Management Policy DM17 (Trees, woodland and landscape features) introduces the requirement for three new trees to be planted per net new dwelling, and a significant number of new trees to be planted for major new employment and infrastructure development. It also includes details of where on-site planting is impractical and the need to take into account the long-term

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relationship between trees and a development. The Council's Tree Planting Advice note provides further detailed information.

Strategic Policy S2 (Addressing Climate Change and Flood Risk) and Development Management Policy DM19 (Renewable and Low Carbon Energy) allow solar and wind farms to be approved in suitable locations. Further allocations for such development are not included in the Local Plan for the reasons set out in the Preferred Options Climate Change Topic Paper.

Strategic Policy S9 (Infrastructure Requirements) identifies opportunities for renewable and low or zero carbon or district-scale energy production as being potential infrastructure required to support developments. Renewable, low carbon and decentralised energy schemes are also encouraged to be considered in larger site allocations at Strategic Growth Site 6 (North East Chelmsford – Chelmsford Garden Community) and Strategic Growth Site 16a (East Chelmsford Graden Community (Hammonds Farm)).

The consideration of the impact renewable energy proposals may have on historic assets is covered in more detail in the Making Places SPD. This will be reviewed, and any appropriate changes/additions included. Further information on the approach to the Historic Environment is set out in the Preferred Options Topic Paper.

Active and sustainable travel are covered through the Preferred Options Local Plan. They are included within Strategic Priority 1 (Addressing Climate Change and Ecological Emergency), 2 (Promoting smart, active travel and sustainable transport), 3 (Protecting and enhancing the Natural and Historic Environment, and support an increase in biodiversity and ecological networks), 7 (Creating well designed and attractive places, and promoting the health and social wellbeing of communities), and 8 (Delivering new and improved strategic and local infrastructure), and feed into Strategic Policy S1 (Spatial Principles).

The need for active and sustainable transport to be included in development is then required in Strategic Policies S2 (Addressing Climate Change and Flood Risk), S14 (Health and Wellbeing), S5 (Protecting and Enhancing Community Assets), S16 (Connectivity and Travel), S9 (Infrastructure Requirements), S11 (The Role of the Countryside), S17 (Future of Chelmsford City Centre), through site allocation policies, and through Development Management Policies DM4 (Employment Areas and Rural Employment Areas), DM7 (New Buildings and Structures in the Green Wedge, DM10 (Change of Use (land and buildings) and Engineering Operations), DM20 (Delivering Community Facilities), DM24 (Design and Place Shaping Principles in Major Developments, and DM27 (Parking Standards).

Strategic Policy S4 (Conserving and Enhancing the Natural Environment) and Development Management Policy DM16 (Protection and Promotion of Ecology, Nature and Biodiversity) requires qualifying developments to provide a minimum of 10% biodiversity net gain above the existing ecological baseline value of the site (20% on the Garden Communities). It also supports creating biodiversity sites in appropriate locations.

Strategic Policies S4 (Conserving and Enhancing the Natural Environment) and S17 (Future of Chelmsford City Centre), and relevant site policies include the need for development to take into account the Council's [Plan for Improving Rivers and Waterways](#) 2022 (Item 7 on Agenda available via the link), which sets out opportunities to improve the appearance, attractiveness, and recreational use of

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these assets and to promote schemes and activities that enhance their habitat, ecological and biodiversity value.

### 2 Promoting smart, connected active travel and sustainable transport

Key statistics tables

Question	Yes	No	Comments	Total number of responses
<b>9. Do you agree with the proposed approach being taken? If not, please give the reasons for your answer.</b>	37	12	39	88
<b>10. Do you have any views on the Council's current local planning policies of relevance to smart, active travel and sustainable transport and the decisions they lead to?</b>	N/A	N/A	31	31
<b>11. Do you have any views on the areas identified for additional or enhanced policy requirements?</b>	N/A	N/A	35	35
<b>12. Do you have any views on the proposed ideas for new policies?</b>	N/A	N/A	39	39
<b>13. Have we missed anything? Where possible, please support your answer with reference to any evidence.</b>	N/A	N/A	25	25

Summary of Specific and DTC consultees comments:

- Support for the proposed approach (Essex County Council, Rochford District Council, Sandon Parish Council, Braintree District Council, Chignal Parish Council, Writtle Parish Council)
- Broadly agree with the proposed approach and welcome measures to improve cycle parking and storage but there are some key omissions including the urgent need for new cycle routes and paths, for sustainable transport infrastructure to take account of very local opportunities and constraints, and the potential role of Parish Councils in helping to bring infrastructure forward (Broomfield Parish Council)
- There needs to be a radical rebalance to support sustainable transport, for instance lane narrowing to accommodate safe cycle lanes and reduce vehicle speeds. Compulsory Purchase Orders should be considered where necessary (Broomfield Parish Council)
- Current plan policies have resulted in development in areas without a good level of existing or proposed transport infrastructure and/or little capacity for sustainable travel infrastructure. For example, West Chelmsford and North of Broomfield have had proposed sustainable transport infrastructure withdrawn including a bus gate and the Great Waltham Cycle Route respectively (Broomfield Parish Council)

- It is envisaged that all transport interventions will need to consider carbon impacts and that the emerging new Local Transport Plan will include a specific carbon zero transport target (Essex County Council)
- The Local Cycling and Walking Infrastructure Plan (LCWIP) is being updated and will need to be considered in the review (Essex County Council)
- Have a greater emphasis on promoting integrated sustainable transport (particularly in relation to new road options); encouraging the use of Travel Plans; provision of suitable linkages for pedestrians and cyclists; enabling passenger transport options in new developments; and the connectivity between housing and employment areas (Essex County Council)
- The provision and delivery of active and sustainable travel infrastructure in Local Plan policies should make sustainable modes favourable in comparison to the private car, to promote modal shift. CCC is referred to the findings of the independent Essex Climate Action Commission (ECAC) Report 2021 (Essex County Council)
- Cycleway, junction improvements and traffic management measures are already being implemented as part of the Chelmsford Active Travel Fund to help address peak time capacity issues on main roads through the city centre (Essex County Council)
- ECC has published its Bus Service Improvement Plan (2021 - 2026) to provide a new, high quality and reliable bus network (Essex County Council)
- Bus Network Reviews are being undertaken to identify barriers to passenger growth, connectivity or accessibility; identify measures to over-come the barriers and promote bus passenger growth (Essex County Council)
- ECC is undertaking a number of projects and reviews with regards to highway and transportation policy for existing and for new communities, which will feed into Local Transport Plan (Essex County Council)
- Support the principle of establishing multifunctional greenways to promote sustainable and active travel movements and contribute to health and wellbeing (Essex County Council)
- Welcome working with CCC on new highway and sustainable travel options, any implications arising from the A12 widening scheme, the integration of sustainable travel with any road proposals, and any transport hubs to support sustainable growth. However, the wider effect of any such new infrastructure will need to be fully assessed through the transport evidence (Essex County Council)
- ECC acknowledges there is a need for more innovative ways to tackle behavioural change regarding the take up of sustainable modes rather than the present approach by simply monitoring travel patterns. ECC is presently reviewing travel planning requirements for new developments to focus on achieving and maintaining higher mode share targets for active and sustainable travel (Essex County Council)
- Plan policies should include proactive action to retrofit public EV charging points in residential areas and not just focus on provision for new housing developments (Great Waltham Parish Council)
- Off peak bus services in Great Waltham are poorly used and need to be more affordable (Great Waltham Parish Council)
- Consider charging by car at the Park and Ride facilities to encourage more people to car share to them (Great Waltham Parish Council)

- No recognition in current plan policies of the need to connect South Woodham Ferrers and the villages to Chelmsford City other than by existing roadways. Better connectivity is needed by bike off the current road network and bus services need improving to encourage a shift away from the private car (South Woodham Ferrers Town Council)
- Support the installation of more domestic and publicly accessible EV charging points and ECC's preferred standards. ECC is preparing an Electric Vehicle Strategy to help with the roll-out of charging infrastructure and will work with CCC to help identify charging point locations and funding opportunities (Essex County Council)
- Support requiring contributions towards or the provision of car clubs on all major development sites (Essex County Council)
- Support the potential to allocate or safeguard land for expanding current Park and Ride sites (Essex County Council)
- ECC would still like to develop a new Park and Ride site to the west of Chelmsford in the future and which may well depend on the preferred spatial strategy (Essex County Council)
- New initiatives should have the broadest possible appeal (Great Waltham Parish Council)
- Developments should not go ahead without agreed transport infrastructure (Broomfield Parish Council)
- Support expansion of EV charging stations like Gridserve at Great Notley (Braintree District Council)
- Support proposals for walkable neighbourhoods for new major developments and considering how new neighbourhoods can be connected to the wider area (Braintree District Council)
- Support for many of the proposed policy changes including 15/20 Minute Walkable Neighbourhoods. Attractive active and public transport links should be provided between new and existing communities and between communities and infrastructure to promote integration and to ensure that benefits of growth are felt by the whole population (Mid and South Essex Integrated Care Board)
- Welcomes the opportunity to work with CCC to articulate what the health and wellbeing elements of a walkable neighbourhood would comprise and to consider how the principles can be applied to existing neighbourhoods to support reduction in health inequalities and improve population health (Mid and South Essex Integrated Care Board)
- Broadly supports the approaches being considered for new policies, acknowledging the relatively poor north-south connections within Essex. Would support opportunities to deliver better connected communities across the plan area including those settlements closer to Rochford District to its south, including South Woodham Ferrers (Rochford District Council)
- Support delivery of improvements to integrated active travel and sustainable transport routes between Rochford District and locations within Chelmsford City (Rochford District Council)
- Support for exploring a new policy on 15/20 minute walkable neighbourhoods within major developments. Suggest CCC consider current good practice and advice from the Town and Country Planning Association, the Essex Design Guide (EDG) and Sport England's latest Active Design guidance to be published in 2023 (Sport England)



- Support 15/20 Minute Walkable Neighbourhoods (Great Waltham Parish Council, Broomfield Parish Council)
- Still need provision for those who cannot walk/cycle 15/20 minutes or when things such as adverse weather make walking/cycling difficult or unsafe (Great Waltham Parish Council)
- The success of policies will depend on buy-in from other stakeholders such as education, employers and retailers (Broomfield Parish Council)
- 15/20 Minute Walkable Neighbourhoods should be an aspiration within appropriate locations rather than a blunt tool for site allocations or if could be used to prevent appropriate development, for example, in rural areas which are unable to meet all the principles. Success will require CCC to work with its partners to ensure local public services are in place and are retained (Home Builders Federation)
- Concern over whether 15/20 minute walkable neighbourhoods will be sustainable (Chelmer Housing Partnership)
- Question whether there is demand for allocating and safeguarding land for Park & Ride expansion; would be better if residents had a reliable, comfortable bus service to Chelmsford when they need it (South Woodham Ferrers Town Council)
- Needs to be more secure cycle storage facilities to increase bicycle travel including South Woodham Ferrers (South Woodham Ferrers Town Council)
- Useful to engage regarding future consideration of rapid transit e.g. linking to the Great Dunmow, the airport and the A120 corridor (Uttlesford District Council)
- Plan should mention of the role of parish councils in promoting sustainable transport infrastructure, especially through neighbourhood plans, for example, ensuring that proposals make sense locally. However, they need officer support particularly from Essex Highways and funding (Broomfield Parish Council)
- Alongside the proposal for 15/20 minute neighbourhoods, there needs to be a greater recognition of the need to locate major new housing developments close to commuting infrastructure. Major housing therefore needs to be located close to relevant transport hubs (e.g. the new rail station) and the A12 and A130 (south) corridors. It should be a given for all the five Spatial Approaches (Broomfield Parish Council).

#### Summary of General Consultees Comments:

- Support for the proposed approach (Newlands Spring Residents Association, Chelmer Housing Partnership, North West Parishes Group)
- Plan policies have resulted in development in areas without a good level of existing or proposed transport infrastructure and/or little capacity for sustainable travel infrastructure. For example, West Chelmsford and North of Broomfield have had proposed sustainable transport infrastructure withdrawn including a bus gate and the Great Waltham Cycle Route respectively (North West Parishes Group)
- Focus development closer to strategic transport corridors, such as the A12, the A130 and rail stations (North West Parishes Group)
- Sustainable transport alternatives need to be affordable and reliable (Chelmer Housing Partnership)

- Provide more detail on how proposals will be managed in more rural locations (Chelmer Housing Partnership)
- Support expressed for proposed policy changes (Chelmer Housing Partnership, L&Q)
- Evidence shows that hyper local neighbourhoods are more inclusive and resilient and overall build better communities for example, Sustrans (Chelmer Housing Partnership)
- Providing storage facilities for cycle equipment is often a design challenge; suggest that it would be the residents' choice whether to use the storage provided within their homes for cycle equipment, rather than imposing this as an additional storage requirement (L&Q).

#### Summary of Developer/Landowner/Agent Comments:

- Support expressed for the proposed approach (Pembroke Land Group, Grosvenor Property UK and Hammonds Estates LLP, Rosehart Properties Ltd, London & Cambridge Properties Limited, Taylor Wimpey, Croudace Homes, Vistry Group, Dandara, Wates Developments Limited, Chelmsford Garden Community Consortium, Dandara Eastern, Bellway Strategic, Bellway Homes Ltd, Harris Strategic Land Limited, Greystoke CB, Hill Residential Ltd, Dominvs Group)
- Approach is consistent with national planning policy (Croudace Homes, Wates Developments Limited)
- Proposed approach should go beyond the identified initiatives and acknowledge that reliance on the private car is inevitable in more rural areas which are less accessible by sustainable modes of transportation (Dandara)
- The Strategic Priority should reference the role of settlement patterns in minimising travel by the private car (Dominvs Group)
- Support/endorse current plan policies (Taylor Wimpey, Gladman Developments Ltd, Pembroke Land Group, Dominvs Group)
- Consider more policy changes around opportunities for active travel. This will be particularly important if new development is allocated around the city (Dandara)
- Support expressed for some/all of the proposed policy changes (Taylor Wimpey, Rosehart Properties, Dominvs Group)
- Contributions to car club spaces off-site should be an evidenced base approach to justify how a contribution may support delivery and where else this should be located (Wates Developments Limited)
- Car Clubs policies should not focus on simply the number of car club spaces for a development but instead evidence consultation with car club providers and the encouragement of residents to use them (Dominvs Group)
- Should be cautious not to duplicate building regulations requirements for EV car charging points and to future proof the plan in the event that building regulations change (Wates Developments Limited)
- Designing EV charging points into new developments is more cost effective than seeking to install them retrospectively (Dandara, Graham Dines)

- Planning policies to “future proof for autonomous vehicles” is forward-thinking but could become unnecessarily onerous given the embryonic technology and associated legislation (Dominvs Group)
- Do not support policies to future proof developments to accommodate autonomous vehicles. This is contrary to the aspirations of NPPF and may promote new development that prioritises car usage over active and sustainable travel modes (Bellway Strategic, Bellway Homes Ltd)
- Support a flexible approach to 15/20 minute walkable neighbourhoods which reflects the context of each site and lower site densities that may be required in rural areas (Dandara, Dandara Eastern)
- Any specific policies that may be developed should be evidence-based and viability tested. The future expansion of Park and Ride facilities must be justified by need, together with mechanisms for recovery of land in the event that projected levels of demand for the Park and Ride facilities do not occur at the point when the plan is adopted (Ptarmigan Chelmsford A Limited)
- The review plan should continue to maximise development in Chelmsford City Centre and include ambitions for travel within the city centre itself. For example, the creation of a network of positive, animated, active, safe routes and spaces and to feed footfall into key areas of the existing city centre network (Dominvs Group)
- Allocate new development in Service Settlements to help increase bus service provision and a shift towards more sustainable modes of travel (Dandara)
- Significant growth within rural villages and along transport corridors is considered to consolidate an existing reliance on private car travel within these locations, and does not align with the Council’s stated aspirations (Grosvenor Property UK and Hammonds Estates LLP)
- Sites in the Green Belt sites could deliver smart, active travel and sustainable transport (Hill Residential Ltd)
- Recognise the locational needs of the logistics sector and have policies to enable it to transition to a low carbon sector (Greystoke CB)
- Various developer/agent/landowner submissions comments suggesting that their proposed development sites will accord with the proposed approach.

#### Summary of Public Comments:

- Both support and opposition expressed for the proposed approach
- The approach/proposals are very Chelmsford City centric
- Support and opposition expressed for proposed policy changes and 15- 20 minute neighbourhood model
- Should require all new housing to provide direct access to cycling/walking networks alongside new homes
- Sustainable travel/alternatives to the car need to be realistic and affordable
- Better bus services are needed including in rural areas
- Unclear how initiatives will work in rural areas
- Ensure all new homes have electric charging points
- Also need to make existing development more sustainable
- The Chelmsford LCWIP is limited in scope and backward looking
- Greater active travel opportunities will require safe segregated and attractive active travel routes across the city
- Support using/extending Green Wedges for active travel where appropriate

- CCC should produce its own Cycling and Walking Strategy like East Suffolk Council
- Support for a light tram loop network to link new and planned developments to the railway stations. This could utilise existing bus lanes on Chelmer Valley Road
- Suggest a Bus Contract Pilot for Central Essex
- Traffic modelling needs to assess the impact of new development on Boreham Interchange which could worsen with the proposed improvements including the Chelmsford North East Bypass
- Cycle routes must extend further from the city centre and be safe to use, not on shared arteries
- Need to consider the impacts of autonomous vehicles increasing car ownership
- Ensure land is allocated for fossil fuel replacements
- Existing public transport is inadequate, and the policies lack vision
- Should do more to address areas of high traffic and rat runs
- Designate low traffic neighbourhoods
- New neighbourhoods should give priority to pedestrians and bikes over cars
- Need better bus services from villages to provide an affordable alternative to the car
- Focus development in urban areas closest to facilities and services
- Have shuttle buses across the city e.g. from Park and Ride to Broomfield Hospital
- Bike theft is an issue in the city centre
- Need up to date signage
- Remember the need for some residents to travel by car including the elderly
- Concern that proposals will not result in any improvement
- Ensure walking and cycling routes are future proofed for climate change for example, that they will not flood
- 15- 20 minute neighbourhood model will not work for Land North of South Woodham Ferrers given separation from the existing town by a road carrying increasing levels of traffic
- Most people need to travel significant distances to work which will likely be done by car rather than by bike
- Car clubs are highly unlikely to be of any use outside major centres of population
- Include reserve land needed for local infrastructure improvements for example, a new By-Pass / Ring Road to take the increasing levels of traffic generated by developments to the east of South Woodham Ferrers.

### **Our evidence says**

The following traffic modelling has been undertaken:  
Sustainable Accessibility Mapping and Appraisal of Sites 2022 – this assessed 25 settlement areas identified across the five spatial approaches in the Issues and Options consultation document on their level of sustainable connectivity to key urban centres, employment, rail stations, bus services and bus stops, healthcare and education. They were also assessed on their digital connectivity highlighting the ability for residents to work from home thereby reducing peak hour journey

## Our evidence says

trips on the local transport network. It should be noted that the appraisal assesses the current accessibility and connectivity of the locations and at this stage does not take into account future uncommitted infrastructure improvements which might come forward to support new development.

Transport Impact Appraisal of Spatial Approaches 2023 – this sets out the modelling methodology, results, and findings of the traffic impact appraisal of three selected Spatial Strategy options, identified following the Issues and Options consultation. The evidence shows that, in terms of overall network impact (severity and breadth) and without considering the scope for mitigation, option 2 is modelled as having the smallest impact, and option 3 as having the largest. Option 1 is characterised as having a broader, but less pronounced impact on the road network.

Transport Impact Appraisal of the Preferred Spatial Approach 2024 - sets out the modelling methodology, results, and findings of the traffic impact appraisal of the Spatial Strategy included within the Preferred Options. It concludes that impact on traffic is largely limited to the A12 corridor, the junctions along it and, to a lesser extent, the A1114 and A138 corridors into Chelmsford City Centre. Overall, the allocation of development in the Preferred Options consultation document provides the opportunity to make good use of existing and potential sustainable accessibility to and from proposed sites. However, this will be dependent on the delivery of the bus, cycling and walking infrastructure proposed, as well as additional measures required to provide the necessary connectivity to the wider sustainable transport network. This will be crucial to ensure that the growth in trips associated with the proposed development is managed and does not have a negative impact on the surrounding local area. 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.

The wider cross boundary impacts are included in the relevant assessments.

The Preferred Options IIA 2024 focuses on sustainable development through a number of inter-related topics. Policies to ensure the delivery of infrastructure would help to mitigate the impact of new development by relieving congestion and promoting sustainable transport, and when combined with the locational approach to employment and retail uses would have a significant positive effect on transport.

## The Preferred Options Local Plan

Active and sustainable travel are covered throughout the Preferred Options Local Plan. They are included within Strategic Priority 1 (Addressing Climate Change and Ecological Emergency), 2 (Promoting smart, active travel and sustainable transport), 3 (Protecting and enhancing the Natural and Historic Environment, and support an increase in biodiversity and ecological networks), 7 (Creating well designed and attractive places, and promoting the health and social wellbeing of communities), and 8 (Delivering new and improved strategic and local infrastructure), and feed into Strategic Policy S1 (Spatial Principles).

The need for active and sustainable transport to be included in development is then required in Strategic Policies S2 (Addressing Climate Change and Flood Risk), S14 (Health and Wellbeing), S5 (Protecting and Enhancing Community Assets), S16 (Connectivity and Travel), S9 (Infrastructure Requirements), S11 (The Role of the Countryside), S17 (Future of Chelmsford City Centre), through

## The Preferred Options Local Plan

site allocation policies, and through Development Management Policies DM4 (Employment Areas and Rural Employment Areas), DM7 (New Buildings and Structures in the Green Wedge, DM10 (Change of Use (land and buildings) and Engineering Operations), DM20 (Delivering Community Facilities), DM24 (Design and Place Shaping Principles in Major Developments, and DM27 (Parking Standards).

Relevant proposed site allocation policies provide requirements for new or improved active travel routes.

New Strategic Policy S16 (Connectivity and Travel) and Development Management Policies DM7 (New Buildings and Structures in the Green Wedge), and DM10 (Change of Use (land and buildings) and Engineering Operations) introduce the role and function of Green Wedges to include infrastructure to support active travel.

Neighbourhood Plans which seek to assist in bringing forward more active and sustainable transport routes and infrastructure are welcomed.

New Strategic Policy S16 (Connectivity and Travel) includes reference to the Local Cycling and Walking Infrastructure Plan (LCWIP). The City Council rely on Essex County Council to produce these as the Highways and Transportation Authority.

New Strategic Policy S16 (Connectivity and Travel) seeks to create sustainable places which promote connectivity for all, by providing better access to modes of active and sustainable travel, including supporting development and infrastructure. It also includes new strategic scale developments to ensure they have considered how walkable neighbourhoods can be achieved, as well as achieve a significant modal shift to active and sustainable modes of travel.

New Strategic Policy S14 (Health and Wellbeing) includes the need for developments to create opportunities for active travel, including the provision of safe and attractive pedestrian and cycle routes. It also requires strategic scale development to incorporate Sport England and national Design Guide Active Design principles.

Strategic Policy S9 (Infrastructure Requirements) includes reference to the existing Essex County Council Local Transport Plan (LTP) and the need to continue to work with Essex County Council on the emerging LTP and include any further infrastructure requirements as they emerge. It also includes the consideration of additional Park and Ride facilities in West of Chelmsford and North East Chelmsford in the broad locations show on the draft Policies Map.

Development Management Policy DM25 (Sustainable Buildings) includes updated requirements for Electric Vehicle charging points. These are based on the Essex Part 1 Parking Guidance.

### 3 Protecting and enhancing the Natural and Historic Environment, and support an increase in biodiversity and ecological networks

#### Historic Environment

Key statistics:

Question	Yes	No	Comments	Total number of responses
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<b>14. Do you agree with the proposed approach being taken? If not, please give the reasons for your answer.</b>	27	6	22	55
<b>15. Do you have any views on the Council's current local planning policies of relevance to the historic environment and the decisions they lead to?</b>	N/A	N/A	19	19
<b>16. Have we missed anything? Where possible, please support your answer with reference to any evidence.</b>	N/A	N/A	15	15

Summary of Specific and DTC consultees comments:

- The proposed approach to the historic environment is consistent with the latest national policy and guidance (Historic England)
- Important to celebrate local distinctiveness (Chignal Parish Council)
- Support the proposed approach of enhancement rather than preservation and avoiding harm of the historic environment (Broomfield Parish Council, Writtle Parish Council)
- Greater emphasis is needed for more control in areas with heritage assets (Writtle Parish Council)
- Reference needs to be made to Neighbourhood Plans (Writtle Parish Council)
- No issue with current plan policies (Great Waltham Parish Council)
- Current policies have led to some poor decisions (Broomfield Parish Council)
- Current policies do not have reference to local design codes (Broomfield Parish Council)
- South Woodham Ferrers was an outstanding 'Riverside Town' when built. The town's uniqueness has been overlooked in a historic sense. The town has a separate identity to Chelmsford (South Woodham Ferrers Town Council)
- What does 'celebrate' actually mean; it could represent something to everyone without being at all specific (Great Waltham Parish Council)
- Intention of the proposed policy is unclear and potentially contradictory (Great Waltham Parish Council).

Summary of General Consultees Comments:

- Support for the proposed approach to the historic environment (Newland Spring Residents Association).

Summary of Developer/Landowner/Agent Comments:

- Support expressed for the proposed approach (Grosvenor Property UK and Hammonds Estates LLP, Dominvs Group, Chelmsford Garden Community Consortium)
- Support the approach of enhancement of the historic environment rather than preservation and avoiding harm (Medical Services Danbury, Sampra Homes)

Ltd, Mr A Smith, Marden Homes Ltd, Chelmsford Garden Community Consortium)

- The approach should make reference to how new developments can positively contribute to enhancement of heritage assets (Dominvs Group)
- Current plan policies are consistent with national policy (Pembroke Land Group, Rosehart Properties, Gladman Developments Ltd).

#### Summary of Public comments:

- Support the approach of enhancement of the historic environment rather than preservation and avoiding harm
- The proposed approach needs to be made clearer
- The current approach to Protected Lanes is inadequate and they should have their own policy
- Support expressed for current policies and references in the Making Places SPD about built environment heritage assets
- Need to restore the historical character of Essex
- More needs to be done to protect natural historical character such as historic battle locations and ancient woodlands
- Should preserve the character of villages for future generations
- Chelmsford has lost many of its historic buildings due to poor development decisions
- There is too much new building and not enough regeneration
- Plan should give more encouragement to using/visiting historic environments
- Current plan policies are ruining the historic environment
- The Making Places SPD should include the river confluence and water space including local heritage buildings such as Moulsham Mill.

#### **Our evidence says**

Four separate Heritage Assessments provide an assessment of the setting of designated and built non designated heritage assets within or in the vicinity of the preferred development sites. These have informed the site-specific allocations policies.

The Preferred Options IIA 2024 focuses on sustainable development through a number of inter-related topics. Policies to protect the historic environment would have significant positive effects on cultural heritage, landscape and townscape, and a minor positive effect on urban renaissance.

#### **The Preferred Options Local Plan**

Strategic Policy S3 (Conserving and Enhancing the Historic Environment), and Development Management Policies DM13 (Designated Heritage Assets), DM14 (Non-designated Heritage Assets), and DM15 (Archaeology) remain largely unchanged as they continue to be consistent with national policy and guidance and are supported by Historic England.

In line with the 2023 Heritage Assessments, the site policies identify any potential Historic Assets which require protection and/or mitigation measures to ensure they are not harmed through proposed site allocations.



## The Preferred Options Local Plan

The Making Places SPD will be reviewed, and any appropriate changes/additions included.

Further information on the approach to the Historic Environment is set out in the Preferred Options Historic Environment Topic Paper.

### Natural Environment

Key statistics:

Question	Yes	No	Comments	Total number of responses
<b>17. Do you support the approach to be taken? If you disagree, please explain why</b>	34	13	32	79
<b>18. Do you have any views on the Council's current local planning policies of relevance to the natural environment and the decisions they lead to?</b>	N/A	N/A	27	27
<b>19. Do you have any views on the proposed ideas for new policies?</b>	N/A	N/A	55	55
<b>20. Have we missed anything? Where possible, please support your answer with reference to any evidence.</b>	N/A	N/A	18	18

Summary of Specific and DTC consultees comments:

- Support for approach (Essex County Council, Anglian Water Services Ltd, South Woodham Ferrers Town Council, Great Waltham Parish Council)
- Recommends that CCC use Natural England's District Level Licensing (DLL) Risk Zones to steer development away from "amber" zones (there are currently no red zones in Essex) and use the Essex Green Infrastructure Strategy and Technical-Guidance as part of its evidence base, which have been endorsed by Natural England (Essex County Council)
- Particularly support approaches for increasing biodiversity net gain (BNG) that can be integrated with green infrastructure provision and SuDS to reduce surface water run-off from development (Anglian Water Services Ltd)
- The proposed allocation of land for tree and woodland planting is commended particularly where this would provide multiple benefits for the environment, such as reducing surface water run-off and protecting soils (Anglian Water Services Ltd)

- Any review of the Green Wedge policies should ensure no conflict with aims such as flood storage capacity and provision for wildlife (Anglian Water Services Ltd)
- Approach places insufficient emphasis on locally valued landscapes. Local communities and parish councils should be encouraged to evaluate and enhance their local landscape and any relevant studies should feed into a CCC landscape strategy. Neighbourhood Plans following this approach should be given flexibility in applying it to spatial planning (Broomfield Parish Council)
- Support expressed for this proposed new Strategic Priority (Chignal Parish Council)
- Current plan policies are considered acceptable (South Woodham Ferrers Town Council)
- Have encountered no issues with current plan policies (Great Waltham Parish Council)
- Current policies appear to lead to blanket protection of some areas, such as the Green Wedge, pushing development on to other valued landscapes including high grade agricultural land. Prefer a more granular approach where parishes and local communities are empowered to take their own evidence-based decisions about the value of local landscapes and their sensitivity/capacity to absorb development (Broomfield Parish Council)
- Support expressed for ideas for proposed new policies (Environment Agency, Great Waltham Parish Council, Broomfield Parish Council, Uttlesford District Council)
- Broadly support a mandatory requirement for BNG above 10%, and collaboration on delivering this at a pan-Essex level, where appropriate (Rochford District Council)
- Acknowledge the ambition for 20% BNG. Further collaborative working is necessary between councils to consider the feasibility of delivering 10% BNG. In considering mitigation for site allocations, use the mitigation hierarchy in the first instance ahead of any offsite BNG provision. The Local Nature Partnership and the Local Nature Recovery Strategy will consider BNG (Essex County Council)
- Interested in understanding the evidence needed to support the 20% BNG target and how it could be delivered in isolation or on a wider Essex geography (Braintree District Council)
- Support 20% BNG in principle but will need to be justified by a clear evidence base as the policy develops (Natural England)
- Suggest collaborating on how the 20% can be viably secured in policy and made effective by onward monitoring (Uttlesford District Council)
- Consider alternatives to tree planting for carbon retention, for example creation of a saltmarsh and growing hemp or bamboo (South Woodham Ferrers Town Council)
- Include a commitment in the plan to reverse the long term decline in the number of farmland birds, and plans for rewilding or the creation of large wildflower meadows to help our endangered insects. There is no mention of river water quality monitoring, analysis and enforcement for breaches of raw sewage into the River Crouch (South Woodham Ferrers Town Council)
- There is a need to support local communities and parishes to identify and enhance local biodiversity and landscape assets (Broomfield Parish Council).

## Summary of General Consultees Comments:

- Support expressed for the proposed approach and a 20% BNG policy (Newland Spring Residents Association)
- Essential that CCC consults with local wildlife groups on planning applications impacting habitats (The Essex Badger Protection Group)
- Extend Green Wedges to the boundary of the district. Restore the previous Green Wedge southern boundary at Sandford. It was wrong to remove Manor Farm against peoples wishes (Save Sandford Mill Campaign)
- Support for at least 20% BNG (The Woodland Trust)
- A 20% BNG policy will mean that site viability will become an issue, due to the space required for biodiversity. Consider off-site provision so that the best habitat areas can be developed (Chelmer Housing Partnership)
- No justification as to why the 20% BNG target is necessary, directly related to the planning application or fairly and reasonably related in scale and kind to the development being proposed. There is still considerable uncertainty as to the cost of delivering 10% BNG let alone 20%. 20% BNG will add significant cost to development including if more offsite delivery is required. It is considered that the Government consider 10% sufficient to address the impacts of development on biodiversity relating to any site (Home Builders Federation)
- Support a 20% BNG for developments where they produce gains in real terms - not after sites are cleared of all ecological value, making it easy to provide 20% gain with a few lawns and some bird boxes (The Essex Badger Protection Group)
- The review plan should make specific mention of the value of important landscapes to the north-west of Chelmsford such as the Writtle Farmland Plateau and the Pleshey Farmland Plateau (North West Parishes Group)
- Interested in working with CCC in developing policies beneficial to trees and woodland including stipulating a minimum 50 metre buffer for development from ancient woodland where developments exceed 10 dwellings, encouraging veteran trees to be recorded on the Ancient Tree Inventory and requiring 20% BNG units to be maintained for a minimum of 50 years (The Woodland Trust)
- Local Nature Recovery Strategies should inform priority locations for new green infrastructure, and habitat creation and enhancement through BNG (The Woodland Trust)
- Everyone should be able to see three trees from their home and be no more than 300 metres from the nearest natural green space, with safe and accessible routes (The Woodland Trust)
- Consider our 'Access to Woodland Standard' which aspires that everyone should have a small wood of at least two hectares within 500 metres of their home and a larger wood of at least 20 hectares within four kilometres of where they live (The Woodland Trust)
- The Environmental Principles must be treated as a foundational component of the plan which must support the protection of sensitive natural assets, such as ancient woodland; be an exemplar of emerging BNG practice; and set high standards for the retention and provision of trees within developments (The Woodland Trust).

## Summary of Developer/Landowner/Agent Comments:

- Support for the proposed approach to the natural environment (Grosvenor Property UK and Hammonds Estates LLP, Bellway Strategic, Hill Residential Ltd, Cliffords Group Ltd, Dominvs Group, Bellway Homes Ltd)
- Agree that natural environment policies need to ensure they are up to date with the most recent legislation and guidance (Dandara, Dandara Eastern)
- Support expressed for current plan policies – examples of reasons cited include that they are consistent with the NPPF and working effectively (Dominvs Group, Dandara, Dandara Eastern, Hill Residential Ltd, Rosehart Properties Ltd, Pembridge Land Group)
- Support provision for BNG for all major developments (Gray & Sons, Mr Alexander Micklem, Cliffords Group Ltd, Chris Buckenham, The Bucknell Family, Cliffords Group Ltd, Pigeon (Sandon) Ltd)
- Support approach to BNG as it encourages the development of brownfield sites which have the ability to make more transformative improvements to nature than the development of greenfield sites (Dominvs Group)
- Support the Council's ambition to exceed nationally set targets for BNG (Grosvenor Property UK and Hammonds Estates LLP)
- BNG minimum requirements must not compromise the deliverability of non-strategic sites (A.G. & P.W.H Speakman)
- 20% BNG would need to be supported by robust evidence (Greystoke CB)
- A requirement for 20% BNG would need to be finely balanced against viability and land use requirements (Gladman Developments Ltd)
- See how 10% BNG works in practice before reviewing the figure (Aquila Developments Ltd)
- There is uncertainty as to how the implementation of the 10% BNG target as secondary legislation is yet to be published. As such, retain a 10% BNG target with an ambition to exceed this where practical and feasible (Chelmsford Garden Community Consortium)
- Support a 10% BNG minimum requirement or flexibility for smaller sites and allocations to ensure they remain deliverable (H R Philpot & Sons)
- Deploy a more flexible approach to securing BNG on smaller sites to ensure they remain deliverable (Miscoe Enterprises Ltd, Hill Farm (Chelmsford) Ltd, C J H Farming Ltd)
- Requiring a BNG target above 10% should be an aspiration reflecting site circumstances (Taylor Wimpey, Rosehart Properties Ltd, Pembridge Land Group)
- Support BNG as part of developments, but there is no evidence base to justify a policy requirement higher than 10%. A better approach is for the policy to support national requirements, whilst encouraging developers to deliver a higher level of BNG where this is possible (Wates Developments Limited)
- Agree with the principle of BNG, but as 20% may be more difficult to achieve on previously developed sites a different approach should be explored (London & Cambridge Properties Limited)
- Do not support 20% BNG (Harris Strategic Land Limited, Bellway Strategic, Bellway Homes Ltd, Tarmac Trading Ltd, Gleeson Land)
- No evidence to support a 20% BNG target locally (Aquila Developments Ltd, Gleeson Land)

- Requiring 20% BNG could impact development viability/will need to be fully evidenced/justified (Dandara, Gleeson Land, Chelmsford Garden Community Consortium, Tarmac Trading Ltd, Taylor Wimpey, Bolton, S&D, Mr J Bolingbroke)
- Without any justification/evidence, 20% BNG is not considered effective or compliant with the NPPF. It will impact on the capacity and viability of development sites and the provision of other infrastructure and affordable housing as a larger proportion of available site area will be required for the delivery of habitat creation or enhancement. Retain the 10% minimum requirement for BNG (Bellway Strategic, Bellway Homes Ltd)
- Need to consider impact of 20% BNG cumulatively with the 'three for one' policy on new trees (Bellway Homes Ltd)
- 20% BNG on site could be difficult where existing ecological baselines are higher and will place pressure on the cost and availability of nearby land to provide off-site enhancements. Consider identifying large scale strategic opportunities in the review plan which developers could contribute to (Mr J Bolingbroke)
- Any BNG policy should recognise that where it cannot be achieved on site, off-site provision or financial contributions should be made subject to viability (Dandara)
- Target for 20% BNG is overly onerous and could be unworkable or unsustainable. Onsite provision could have implications on land take as a result of lowering average housing / employment densities onsite (Tarmac Trading Ltd)
- 20% BNG could undermine the deliverability of the plan and make some sustainable sites unviable. For example, if the current biodiversity value of a site is already high achieving a 20% increase will be significantly more difficult to achieve on site. The need to provide additional land off-site or purchase biodiversity 'credits' may negatively impact development viability and delivery of other benefits such as affordable housing (Gleeson Land)
- 20% BNG could impact the viability of a large number of developments and need to be fully evidenced. Suggest that any policy wording recognises that where it cannot be achieved on site, off-site provision or financial contributions should be made subject to viability as to not prevent the supply of housing (Dandara Eastern)
- Significant policy changes in the review plan could adversely affect the delivery timescales and viability of Chelmsford Garden Community Zone 1. Whilst the Development Framework Document (masterplan) reflects the aspiration to achieve 20% BNG for the development as a whole, the review plan should not set a target which exceeds the national requirement (Ptarmigan Chelmsford A Limited)
- 20% BNG will lead to the need for more land to be allocated for future development and potentially impact on development viability. Will need to be fully justified and evidenced. Any policy wording should recognise that where it cannot be achieved on site, off-site provision or financial contributions should be made subject to viability (Hill Residential Ltd)
- 20% BNG will need to be justified and tested. It will result in lower dwelling yields, meaning more allocated sites will be needed to deliver the housing requirement (Obsidian Strategic Asset Management Ltd)

- Local Plan Review should place an emphasis on equality of access to natural spaces, to ensure that the multifunctional benefits of green and blue infrastructure are available to all (Grosvenor Property UK and Hammonds Estates LLP)
- Promotion of land to the north of Roxwell for potential biodiversity offsetting (Tarmac Trading Ltd)
- Various developer/agent/landowner submissions made suggesting their site could contribute to BNG.

#### Summary of Public Comments:

- Mix of support and opposition for the proposed approach to the natural environment
- Proposed development at Hammonds Road would be inconsistent with the approach
- Unclear how development on a greenfield site can increase biodiversity
- There is too much green space being urbanised
- Plans/policies are not ambitious enough/need to do more
- Support flower planting alongside tree planting
- Countryside around wooded and common land should be given extra protection
- Our green spaces are fragmented and restrictive, and plans need to be more ambitious
- Essex needs a national park or Area of Outstanding Natural Beauty
- Work with other councils to dedicate and connect enormous areas of land for residents and wildlife
- Expand the narrow foot paths along rivers/farmland into vast wetland and meadows along the River Chelmer
- The environment of the Chelmer River, Chelmer Blackwater Navigation and the Chelmer Valley need protection from overuse, pollution and building
- Habitat and species mitigation/protection planning conditions need to be properly considered and enforced as they sometimes seem to be ignored
- Must push for as much BNG as possible together with endowment or stewardship schemes (as part of Section 106) that secure longevity and monitor biodiversity quality and ecological progress. Include streams and waterways
- Building on arable land and then adding trees and hedges to a new development does not increase biodiversity. A well-argued policy about preserving and enhancing the natural environment is needed
- Current policies are too loosely worded and meaningless, so securing net biodiversity gain is a tick box exercise
- No specific commitment in existing policies to the degree of access to be granted or how these areas will be protected from future development
- Support expressed for 20% BNG
- Arable land, unfarmed open grassland and wetlands also need to be preserved
- Need to ensure the BNG policy is properly delivered, monitored, enforced and the net gain is maintained. The long-term monitoring costs should lie with the developer and not the Council

- Plan should consider pesticide phase out and replacement alternatives
- Plan should consider water resources flood plains, allocation of beaver sites and reservoirs
- Consider areas of waterways upstream from the weir at Chelmer Waterside would benefit from a public realm scheme audit. The proposed highway access bridge will have a negative impact on the development potential of the environment and an alternative should be pursued
- Object to the Manor Farm development and new Country Park.

### **Our evidence says**

The Local Plan Viability Update 2023 supports a 20% biodiversity net gain on the two Garden Communities. It also sets out the reasoning behind the approach retain a requirement for a minimum of 10% biodiversity net gain, while feasibility for a higher amount is being explored on all other policy requirements.

The Green Wedge evidence base reports support the policies in the Preferred Options Local Plan and notations on the draft Policies Map for the Green Wedge.

The Landscape and Sensitivity Capacity Assessments evidence base reports (2017, 2018 and 2024) support the policies in the Preferred Options Local Plan and the employment and housing notations on the draft Policies Map.

The Braintree, Brentwood, Chelmsford, Maldon and Uttlesford Landscape Character Assessment (2006) sets out the characters of the landscapes in the Chelmsford administrative area. This is still relevant.

The Preferred Options IIA 2024 focuses on sustainable development through a number of inter-related topics. Policies to protect the natural environment would make a positive contribution to a number of the IIA objectives, with significant positive effects on biodiversity, flood risk and climate change.

The Habitats Regulations Assessment (HRA) conducted as part of the Preferred Options IIA 2024 sets out that there is no reason suggest any particular site should not be allocated for HRA related reasons, and none of the proposed policies are likely to introduce fundamentally unavoidable adverse effects on the integrity of any European sites. Recreational pressure effects on the Essex Coast, water quality, water resources and air quality are all considered to be able to be suitably mitigated.

Essex Infrastructure Strategy describes the need for green infrastructure in Essex and sets a vision and objectives for the delivery of green infrastructure. The strategy has informed the policies in the Preferred Options Local Plan.

Chelmsford Green Infrastructure Strategic Plan 2018-2036 identifies the character and opportunities associated with Green Infrastructure across the City Council area and has informed the policies in the Preferred Options Local Plan.

[GCN Risk Zones \(Essex\) | GCN Risk Zones \(Essex\) | Natural England Open Data Geoportal \(arcgis.com\)](#) provides an interactive map that shows the extent and distribution of habitats in England.

### **The Preferred Options Local Plan**

Updated Strategic Priority 3 promotes high quality green infrastructure, the protection, enhancement and creation of wildlife corridors and ecological connectivity.

Policy DM16 (Protection and Promotion of Ecology, Nature and Biodiversity) requires development to take account of the Chelmsford Green Infrastructure

## The Preferred Options Local Plan

Strategic Plan, Local Nature Recovery Strategy (LNRS), and the Essex Green Infrastructure Strategy.

Strategic Policy S11 (The Role of the Countryside) makes it clear that any development within Green Wedges should not adversely affect the identified character and function of these distinctive landscapes, which includes flood storage capacity and provision for wildlife.

Strategic Policy S11 (The Role of the Countryside) includes reference to relevant evidence being prepared to support a Neighbourhood Plan being applicable to the consideration of an areas character.

Strategic Policy S4 (Conserving and Enhancing the Natural Environment) and Development Management Policy DM16 (Protection and Promotion of Ecology, Nature and Biodiversity) require qualifying developments to provide a minimum of 10% biodiversity net gain above the existing ecological baseline value of the site, it also encourages the delivery of a greater than 10% mandatory biodiversity net gain. Policy DM16 (Protection and Promotion of Ecology, Nature and Biodiversity) and site allocations policies Strategic Growth Site Policy 6 (North East Chelmsford – Chelmsford Garden Community) and Strategic Growth Site 16a (East Chelmsford Garden Community (Hammonds Farm) also require 20% biodiversity net gain on the two Garden Communities.

Strategic Policy S4 and Policy DM16 also take into account local priorities set out in the Local Nature Recovery Strategy, the Essex Infrastructure Strategy and Chelmsford Green Infrastructure Action Plan, and supports creating biodiversity sites in appropriate locations, including sites associated with the emerging Local Nature Recovery Strategy.

Further information on the implementation of BNG will be set out in a Planning Advice Note and updated Making Places SPD.

Strategic Policy S4 (Conserving and Enhancing the Natural Environment) and Development Management Policy DM16 (Protection and Promotion of Ecology, Nature and Biodiversity) require qualifying developments to contribute to the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS). The Essex Coast RAMS, which has the brand name Bird Aware Essex Coast, aims to deliver the mitigation necessary to avoid adverse effects on the integrity of habitat sites from the in-combination impacts of residential development in Essex.

Development Management Policies DM17 (Trees, Woodland and Landscape Features) and DM23 (High Quality and Inclusive Design) continue to protect natural landscape features which are important to the character and appearance of an area and requires development to respect the character and appearance of an area.

Development Management Policy DM17 (Trees, Woodland Landscape Features) introduces the requirement for three new trees to be planted per net new dwelling, and a significant number of new trees to be planted for major new employment and infrastructure development.

Changes to Green Wedge policies including Development Management Policy DM7 (New Buildings and Structures in the Green Wedge) do not conflict with aims such as flood storage capacity and provision for wildlife.

River water quality monitoring, analysis and enforcement for breaches of raw sewage into the River Crouch is outside the scope of the Local Plan.

Natural England's interactive map, showing the extent and distribution of habitats in England, shows land that is not built-up or farmed to be 'amber'. Such 'amber'



## The Preferred Options Local Plan

land is identified in parts of many greenfield site allocations including 6, 16a and 16b. The Preferred Options Local Plan seeks to minimise the loss of this land. However, to meet our development needs it is inevitable that some such land will be lost. This should be balanced against the relative scale of the loss and other planning factors such as sustainability and general suitability for development of the location. In addition, the IIA does not suggest any particular site should not be allocated for HRA related reasons, and none of the proposed policies are likely to introduce fundamentally unavoidable adverse effects on the integrity of any European sites.

In addition, protection for newts and other species is achieved through policies such as Policy DM16 (Protection and Promotion of Ecology, Nature and Biodiversity) and design policies in general.

### Strategic Priorities for Growth

#### 4 Ensuring sustainable patterns of development and protecting the Green Belt

#### Countryside

Key statistics:

Question	Yes	No	Comments	Total number of responses
<b>21. Do you support the approach to be taken? If you disagree, please explain why?</b>	34	17	62	113
<b>22. Do you have any views on the Council's current local planning policies of relevance to the countryside and the decisions they lead to?</b>	N/A	N/A	36	36
<b>23. Have we missed anything? Where possible, please support your answer with reference to any evidence.</b>	N/A	N/A	17	17

**Q21. Do you support the approach to be taken? If you disagree, please explain why?**

Summary of Specific and DTC consultees comments:

- Support the proposed approach (Braintree District Council, Broomfield Parish Council, Essex County Council)
- Consider the balance between active travel corridors and flood storage capacity and wildlife as there may be a conflict between these aims (Essex County Council)
- Support sustainable greenways for improved health and wellbeing, recreation and commuting. All cycle ways and routes should be hard surfaced and consistent with cycling infrastructure design LTN 1/20 (Essex County Council)

- Support the broader role for the Green Wedges which includes aspirations for new active travel corridors (Broomfield Parish Council, South Woodham Ferrers Town Council)
- Development should be concentrated where there is less need for enhanced active travel corridors (Great Waltham Parish Council)
- Green Buffers are included in the Adopted Braintree Local Plan and these should be considered for Chelmsford too (Braintree District Council)
- Community feedback shows overriding importance of the countryside (Broomfield Parish Council)
- Concern about the sprawl of new development into green countryside (Great Waltham Parish Council)
- Green belt boundaries should only be altered where there is evidence and justified exceptional circumstances (Galleywood Parish Council)
- Approach opens up opportunity for development on Green Belt (Galleywood Parish Council)
- Concern that the green necklace around South Woodham Ferrers will disappear with potential development (South Woodham Ferrers Town Council).

#### Summary of General Consultees Comments:

- Green Belt should not be used for new footpaths or cycle links which would impact on local wildlife (The Essex Badger Protection Group)
- Support the proposed approach (Newland Spring Residents Association)
- Do not support any development which would adversely impact on the existing bridleway network (Essex Bridleways Association).

#### Summary of Developer/Landowner/Agent Comments:

- Support expressed for the proposed approach (Bellway Homes Ltd, Sempra Homes Ltd, Mr A Smith, Marden Homes Ltd, Greystoke CB, C J H Farming Ltd, Grosvenor Property UK and Hammonds Estates LLP, Dandara, Dandara Eastern, Cliffords Group Ltd)
- Proposed approach correctly protects the Green Belt in line with national policy (Bellway Homes Ltd, Bellway Strategic, Greystoke CB)
- Proposed approach directs growth to most sustainable locations in line with national policy (Dandara, Bolton, S&D, Dandara Eastern)
- Support the consideration given to Green Wedges in respect of the provision new active travel corridors (Sempra Homes Ltd, Bellway Strategic, Grosvenor Property UK and Hammonds Estates LLP, Obsidian Strategic Asset Management Ltd, Writtle University College and Endurance Estates, Wates Developments Limited, Stonebond Properties Ltd, Dandara, Saxtons 4x4, Mr J Bolingbroke, Miscoe Enterprises Ltd, The Bucknell Family, Cliffords Group and Mr Mark Peters, Cliffords Group Ltd, Hill Farm (Chelmsford) Ltd)
- Without a Green Belt Review allocations will create a distorted pattern of growth (Rosehart Properties, Pembridge Land Group, Barratt David Wilson)
- A Green Belt Review should be undertaken (Rosehart Properties, Writtle University College and Endurance Estates, Martin Grant Homes, Pembridge Land Group, Hill Residential Ltd, Vistry Group, Ravenscraig Close Ltd, Taylor Wimpey Strategic Land, Saxtons 4x4, Barratt David Wilson)

- Without allocating sites in the Green Belt settlements in the Green Belt will decline (Barratt David Wilson)
- Should allow for more development on brownfield/previously developed land in the Green Belt (Ravenscraig Close Ltd, Sedum Ltd)
- Updated Employment Needs Study is required to assess whether exceptional circumstances exist to release/review land in the Green Belt (Gray & Sons)
- Should consider the role of previously developed land in the urban area to reduce the amount of greenfield land developed (Sempra Homes Ltd, Marden Homes Ltd)
- Should consider expanding existing allocations/maximising the amount of housing in site allocations which are already considered sustainable for growth (Mr A Smith, Marden Homes Ltd)
- Should consider improving sustainable and active travel corridors between the countryside and city centre and not just in Green Wedges (Bellway Strategic)
- Sites for the logistics sector should be allocated outside of the urban area (Greystoke CB)
- Support the protection of the countryside but there should be a review of countryside policy (DM8) to assess the function of the Rural Area and whether it can accommodate a modest amount of residential growth (C J H Farming Ltd, A.G. & P.W.H Speakman, H R Philpot & Sons)
- Improvements in the city centre and waterways provide potential to enhance the Green Wedge and provide opportunity for use of the river for leisure and travel (Dominvs Group)
- Should allow for sustainable settlements to expand into the countryside to ensure the villages retain facilities and services (Dandara, Bolton, S&D, Marden Homes Ltd)
- Should be a review of the wider role of Green Wedges to assess if there are sites within or on the fringes in sustainable/accessible locations or of diminished quality which should be allocated for development (Stonebond Properties Ltd, Dandara Saxtons 4x4, Mr J Bolingbroke, Miscoe Enterprises Ltd, The Bucknell Family, Cliffords Group, Cliffords Group and Mr Mark Peters, Hill Farm (Chelmsford) Ltd)
- Should consider the role of the Green Wedges for leisure, fitness, health and wellbeing beyond the proposed active travel corridors. Provision of leisure facilities/development in the Green Wedges which promote health and wellbeing should be explored and supported (Cliffords Group Ltd, David Lloyd Leisure and Aquila Development Ltd)
- Should consider the role of the Green Wedge in their entirety including in respect of rural diversification in particular rural based businesses and rural tourism as well as leisure (Cliffords Group Ltd).

#### Summary of Public Comments:

- Support new active travel corridors – these can reduce traffic and improve accessibility to the countryside
- New active travel corridors would conflict with the Green Wedge functions for flood storage and wildlife
- Protection for the Rural Area needs to be stronger
- No changes should be made to the Green Wedges
- Green spaces are needed for health and biodiversity

- Approach so far has not protected the Green Belt
- Protecting the Green Belt results in development only going north and west
- Villages are being lost into the urban area
- Green Belt should not be built on
- Green Belt to the south of Chelmsford is poorer quality land which could be developed.

**Q22. Do you have any views on the Council's current local planning policies of relevance to the countryside and the decisions they lead to?**

Summary of Specific and DTC consultees comments:

- Support the approach of current policies (Writtle Parish Council)
- Support the principle current policies to protect the Green Belt and Green Wedges (Uttlesford District Council)
- Suggest the creation of countryside protection zones around sensitive settlement locations where environmental quality is high. Should consider these along the district boundary with Uttlesford (Uttlesford District Council)
- The current blanket policy approach has pushed development to less protected highly valued landscapes for instance the Green Wedge boundary with the B1008 (Broomfield Parish Council)
- Developments on the edge of the city have insufficiently addressed the impact on the countryside (Great Waltham Parish Council).

Summary of General Consultees Comments:

- The current policy does not put emphasis on the creation of equestrian friendly routes (Essex Bridleways Association).

Summary of Developer/Landowner/Agent Comments:

- Current policies reflect the NPPF and direct development in the most sustainable locations (Dandara Eastern, Dandara, Graham Dines)
- The current Green Wedge policy is overly restrictive, and all of the land designated Green Wedge needs to be reconsidered to assess if it is capable of being used for its intended purpose (Sempra Homes Ltd, Obsidian Strategic Asset Management Ltd, Mr J Bolingbroke)
- Council should be more open towards developments in the countryside which could benefit the sustainability of smaller villages particularly sites with good public transport links (Dandara, Graham Dines, H R Philpot & Sons, C J H Farming Ltd)
- The Council should review the Green Belt boundary (Saxtons 4x4)
- Since the current Local Plan was adopted the NPPF has progressed, and the Strategic Policy and Green Wedge designation are constraining development (Obsidian Strategic Asset Management Ltd)

Summary of Public Comments:

- Current policies are inadequate as development has negatively impacted nature and local wildlife

- Current policies do not protect farmland in respect of food security
- Current policies do not emphasise enough the role of farmland in its role as flood protection
- Essential that policies discourage urban sprawl
- Imperative that the Local Plan continues to protect the Green Belt
- Imperative that the Local Plan protects from creating small satellite developments.

**Q23. Have we missed anything? Where possible, please support your answer with reference to any evidence.**

Summary of Specific and DTC consultees comments:

- South Woodham Ferrers should be connected with the National Cycle Network (NCN) with at least one dedicated cycleway (South Woodham Ferrers Town Council)
- South Woodham Ferrers at a disadvantage as it is not protected by Green Belt or the Green Wedge (South Woodham Ferrers Town Council)
- Important to retain through the review a 'green necklace' around the north of South Woodham Ferrers as part of any development in that location (South Woodham Ferrers Town Council)
- Approach should be broadened to be a more granular and with more of a local say (Broomfield Parish Council)
- Specific mention of the role of Neighbourhood Plans should be made about evidence-based decisions about the value of local landscapes and their sensitivity/capacity to absorb development (Broomfield Parish Council)
- Consideration should be given to the wider role of Green Wedges with regards to BNG, inclusion within the Local Nature Recovery Strategy (LNRS) and increasing access to nature (Natural England).

Summary of General Consultees Comments:

- None.

Summary of Developer/Landowner/Agent Comments:

- A Green Belt Review should be undertaken (Rosehart Properties Ltd, Pembridge Land Group, Taylor Wimpey Strategic Lane)
- Consultation is unclear on the approach to settlement boundaries (Aquila Developments Ltd).

Summary of Public Comments:

- Plan needs to have a greater emphasis on 'green jobs'.

<b>Our evidence says</b>
The Green Wedge evidence base reports support the policies in the Preferred Options Local Plan and notations on the draft Policies Map for the Green Wedge.

## **Our evidence says**

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 majority of the agricultural land in Chelmsford is either Grade 2 or 3. The Best and most versatile agricultural land is classified as Grades 1-3a. The Preferred Options Local Plan Spatial Strategy promotes development on previously developed sites. However, as the identified development needs cannot be accommodated solely on previously developed land, the loss of some agricultural land to development is inevitable. The Preferred Options Local Plan would lead to a loss of approximately 853 hectares of Grade 3 agricultural land and approximately 246 hectares of Grade 2 land. This equates to around 2.4% of the total Grade 2 and around 4.2% of the total Grade 3 land in the plan area, although further site-specific assessments are needed to determine the split between Grade 3a and 3b.

The Urban Area Boundaries (UAB) and Defined Settlement Boundaries (DSB) Technical Note 2024 informs and supports the UABs and DSBs on the draft Policies Map.

The Preferred Options IIA 2024 focuses on sustainable development through a number of inter-related topics. Policies to protect the countryside would make a positive contribution to a number of the IIA objectives, with significant positive effects on biodiversity, landscape character, with minor positive effects on other objectives including transport, water, flood risk, cultural heritage, and climate change.

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Strategic Policy S11 (The Role of the Countryside) and Development Management Policies DM7 (New Buildings and Structures in the Green Wedge), DM9 (Infilling in the Green Belt, Green Wedge and Rural Area), DM10 (Changes of Use (land and buildings) and Engineering Operations), DM11 (Extensions to Existing Buildings within the Green Belt, Green Wedge and Rural Area), and DM12 (Rural and Agricultural Workers' Dwellings) offers an appropriate level of protection from development in the Green Wedge.

The Preferred Options Local Plan maximises the amount of development on previously developed land where available.

There are no alterations proposed to the Green Belt boundary. Strategic Policy S11 (The Role of the Countryside) and Development Management Policies DM6 (New Development in the Green Belt), DM9 (Infilling in the Green Belt, Green Wedge and Rural Area), DM10 (Changes of Use (land and buildings) and Engineering Operations), DM11 (Extensions to Existing Buildings within the Green Belt, Green Wedge and Rural Area), and DM12 (Rural and Agricultural Workers' Dwellings) allow for appropriate development in the Green Belt in accordance with national policy and guidance.

The countryside beyond the Green Belt and Green Wedge is known as the Rural Area. Strategic Policy S11 (The Role of the Countryside) and Development Management Policies DM8 (New Buildings and Structures in the Rural Area), DM9 (Infilling in the Green Belt, Green Wedge and Rural Area), DM10 (Changes of Use (land and buildings) and Engineering Operations), DM11 (Extensions to Existing Buildings within the Green Belt, Green Wedge and Rural Area), and DM12 (Rural

<b>The Preferred Options Local Plan</b>
and Agricultural Workers' Dwellings) provide an appropriate level of protection from development in these areas, in accordance with national policy and guidance.
Further information on the approach to the Spatial Strategy is set out in Preferred Options Spatial Strategy and Strategic Sites Topic Paper.
Where relevant site allocations make reference to the need to ensure bridleways are appropriately protected and/or enhanced and Development Management Policy DM10 (Changes of Use (land and buildings) and Engineering Operations) makes it clear that development which supports the role of the Green Wedge as an active travel corridor, includes proposals which facilitate greater use of all other active modes of travel, including leisure travel and horseback.
Strategic Policy S11 (The Role of the Countryside) has been amended to include reference to providing for nature in the Green Wedge, including through the Local Nature Recovery Strategy and biodiversity net-gain.
Strategic Policy S11 (The Role of the Countryside) includes reference to relevant evidence being prepared to support a Neighbourhood Plan being applicable to the consideration of an areas character.
The draft Policies Map indicates the proposed settlement boundaries across the Local Plan area.

### Special Policy Areas (SPAs)

Key statistics:

<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
<b>24. Do you agree with the proposed approach being taken? If not, please give the reasons for your answer.</b>	18	4	10	32
<b>25. Do you have any views on the Council's current Special Policy Areas and the decisions they lead to?</b>	N/A	N/A	14	14
<b>26. Are there any additional Special Policy Areas you think should be added? Where possible, please support your answer with reference to any evidence.</b>	N/A	N/A	15	15
<b>27. Have we missed anything? Where possible, please support your answer with reference to any evidence.</b>	N/A	N/A	10	10

Summary of Specific and DTC consultees comments:

- Support the proposed approach (Broomfield Parish Council, South Woodham Ferrers Town Council, Essex County Council)

- Support the proposed objective of strengthening access to the sites by sustainable modes of transport and minimising traffic pressures on local roads (Essex County Council)
- Concerns about adverse effects of Broomfield Hospital and Chelmsford City Racecourse Special Policy Areas SPAs on the Great Waltham Parish including impacts on local services and facilities (Great Waltham Parish Council)
- Policy should have a commitment to resolve issues arising from activity within the Broomfield Hospital SPA (Broomfield Parish Council)
- Development within SPAs need to be considered in the wider context of the adjoining area, for example traffic impacts generated by the development of Broomfield Hospital and how these are mitigated (Broomfield Parish Council)
- Developments within the Broomfield Hospital SPA do not always take account of adverse quality of life factors generated by their implementation (Great Waltham Parish Council)
- Any work needs to take account of cross border impacts at Broomfield Hospital, Chelmsford City Racecourse and Writtle University College SPAs (Uttlesford District Council)
- Need for stricter controls on development close to the boundary. Impact of development at Chelmsford City Racecourse SPA such as lighting on residents and wildlife in neighbouring districts needs more cross border working (Braintree District Council)
- Current SPA policy has not dealt with the issues around the flood lighting at the Chelmsford City Racecourse (Braintree District Council)
- Support approach to the wider Hanningfield Reservoir Treatment Works site given the impacts of climate change and the essential requirement to continue to supply water to the area and support the council's growth aspirations (Essex & Suffolk Water)
- Amend the Hanningfield Reservoir Treatment Works SPA to include proposals for renewable energy which would reduce reliance on the grid and also contribute towards achieving climate change goals (Essex & Suffolk Water).
- Current policy only refers to Hanningfield Reservoir Treatment Works site. The treatment works is only a part of the water infrastructure at the site and there are numerous pipelines and other infrastructure which may need to be upgraded or replaced and the policy does not recognise this (Essex & Suffolk Water)
- Current Policy has missed the increased role/emphasis of green and blue infrastructure in relation to leisure activities and its effect on health and well-being should be considered (Essex and Suffolk Water)
- Should include plans for active travel links to Hyde Hall and Hanningfield Reservoir SPAs from South Woodham Ferrers (South Woodham Ferrers Town Council)
- Clarification is required for the word 'development' in the RHS Hyde Hall SPA policy as to whether that means development which enhances facilities in the SPA or otherwise (South Woodham Ferrers Town Council)
- Existing SPA Policy has missed the provision of environmental mitigation measures in association with traffic movements generated through and from Uttlesford District (Uttlesford District Council)



- SPA masterplans should be developed in consultation with local communities (Broomfield Parish Council)
- Town Centre brownfield sites should be included as SPAs. This would then have tighter requirements for a denser and more urban form, co-location of uses, quality public realm befitting Chelmsford's city status and its role as a central location for investment. This would also help internalise movements, complement the Green Wedges to control development pressure around the periphery on the quality landscape and agricultural land in the countryside, and overall help to meet resource conservation, embodied carbon and climate change objective. The need is to reduce the impact of growth on traffic volumes and the principal road infrastructure particularly the ongoing impact westwards from Chelmsford on the network (Uttlesford District Council).

#### Summary of General Consultees Comments:

- Support the proposed approach (Newlands Spring Residents Association).
- The current SPA policy on Sandford Mill needs to be reviewed in line with the recommendations made on flooding, flood prevention and infrastructure improvements raised within the I&O consultation document (Save Sandford Mill Campaign).

#### Summary of Developer/Landowner/Agent Comments:

- Agree with the proposed purpose and objectives (Rosehart Properties Ltd)
- No evidence to support a need to designate more SPAs (Pembroke Land Group, Rosehart Properties Ltd)
- Former BAE site should be added as an SPA (Rosehart Properties Ltd)
- To enable delivery of the vision for Writtle University College (WUC), it would be helpful for the Local Plan Review to include a comprehensive review of planning policy at WUC, including the approach to the SPA. The existing policy is simply 'not special enough' and does not currently cover all areas of the campus (Writtle University College and Endurance Estates)
- Expansion of the Writtle University College SPA should be considered. A review of the SPA or Green Belt should be undertaken to include land to the west and south to allow for the continued investment and enhancement in the facilities at WUC (Writtle University College and Endurance Estates).

#### Summary of Public Comments

- Difficult to follow the proposed approach
- Unclear why Broomfield Hospital and Racecourse are SPAs
- Current SPA Policy is failing in respect of Broomfield Hospital and improving the difficult access to Broomfield Hospital should be included
- The land being developed around the hospital should be used for current and future needs of the hospital
- Natural areas should be protected as part of the proposed approach
- Chelmer Valley between Chelmsford and Maldon should be added as an SPA
- The Ridge in Little Baddow/Danbury should be added as an SPA
- Natural environment e.g. ancient woodlands, waterways and former royal hunting grounds should be added as an SPA

- Widford Estate and Hylands Park including the local golf course, businesses and potential park and ride site should be added as an SPA.

### **Our evidence says**

The vehicular access road to Broomfield Hospital proposed in the adopted Local Plan is not part of the masterplan for the development North of Broomfield (SGS8) so is no longer considered achievable/deliverable.

The masterplan for Strategic Growth Site 3a East of Chelmsford – Manor Farm includes a connection to Sandford Mill with a proposed footway and cycleway bridge across the River Chelmer.

Writtle College and Anglia Ruskin University (ARU) merged in 2023. The Titchmarsh Centre at ARU Writtle is a University teaching facility, so is proposed for inclusion in the SPA.

The Preferred Options IIA 2024 considers that the spatial definition of the Special Policy Areas will limit the positive effects to within these areas, but will enable operation and functional requirements to be planned in a strategic and phased manner.

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Where relevant, the SPA policies include provision to manage impacts of development proposals on surrounding areas including minimising traffic pressures on local roads. This would include any mitigation measures that may need to be provided. A key objective of all the SPAs is to strengthen access to the sites by sustainable transport. Information on active travel plans would be too detailed for inclusion within the policies, but SPA1 (Broomfield Hospital Special Policy Area) and SPA4 (RHS Hyde Hall Special Policy Area) have been updated.

Reference to a new vehicular access road from the Main Road has been removed from Policy SPA1 (Broomfield Hospital Special Policy Area) as the road is no longer coming forward. No new residential allocations are proposed in the Preferred Options Local Plan around Broomfield Hospital.

Policy SPA2 (Chelmsford City Racecourse Special Policy Area) has been updated to ensure future developments have regard to nearby residential properties and wildlife.

Existing Policy SPA3 (Hanningfield Reservoir Special Policy Area) makes reference to water infrastructure and ancillary development and is considered fit for purpose. Any additional green/blue infrastructure proposals could be considered on their merits under the existing policy. There is also no need to make specific references to renewable energy proposals as this is adequately covered by Policy DM19 (Renewable and Low Carbon Energy) and the NPPF. The policy has been updated to promote ecological interest.

No amendment to SPA3 (Hanningfield Reservoir Special Policy Area) is proposed to remove the requirement to show a demonstrable need for schemes. This requirement is reasonable so an exception for it can be made in the Green Belt if appropriate. The existing SPA boundary already covers the wider area of Hanningfield Reservoir and promotes appropriate recreational uses.

A reference to connections to Sandford Mill from development to the south has been included in Policy SPA5 (Sandford Mill Special Policy Area).

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Writtle College has been changed to ARU Writtle in Policy SPA6 (ARU Writtle Special Policy Area). A reference to the Titchmarsh Centre has been added to the policy and the draft Policies Map to recognise that this is part of the University campus facilities. Land to the south is excluded from the SPA to protect potential coalescence with Writtle village. The sport pitches at Fox Burrows Lane are also excluded to protect the local landscape.

SPAs are used for facilities or institutions which lie outside built-up areas. This designation is therefore not appropriate on town centre brownfield sites, the former BAE Systems site, Widford Employment Area, The Ridge in Little Baddow/ Danbury, Chelmer Valley between Chelmsford and Maldon, Hylands Park and areas of land not linked to a facility/institution. Any changes to Green Belt boundaries would require a district-wide Green Belt review which is not being undertaken as it is not supported by national planning policy.

### 5 Meeting the needs for new homes

#### Housing

Key statistics:

Question	Yes	No	Comments	Total number of responses
<b>28. Do you support the approach being taken? If you disagree, please explain why?</b>	43	17	82	142
<b>29. Do you have any views on the Council's current housing policies and the decisions they lead to?</b>	N/A	N/A	34	34
<b>30. Should we be considering any alternative options for a housing supply buffer?</b>	N/A	N/A	48	48
<b>31. Do you have any views on the proposed ideas for new policies or significant changes?</b>	N/A	N/A	38	38
<b>32. Have we missed anything? Where possible, please support your answer with reference to any evidence.</b>	N/A	N/A	24	24

Summary of Specific and DTC consultees comments:

- Supports the approach that has been taken to date, but additional evidence base work needs to be undertaken, as identified by CCC, to ensure the Housing Requirement is adequately met (Basildon Borough Council)
- Supports the approach and confirms will not need CCC to meet any of their need (Braintree District Council)
- As CCC is proposing an over-provision, requests consideration is given to accepting some of their housing requirement (Castle Point Borough Council)

- Welcome the acknowledgement that any needs that cannot be met within neighbouring authorities will be considered in establishing the amount of housing to be planned for. This process should follow the Essex Planning Officers' Association (EPOA) Guidance Note Mechanism for the Consideration of Unmet Housing Need (2017) and the Mechanism for the consideration of Unmet Gypsy and Traveller Need (2018) (Essex County Council)
- Dispute the shortfall and need to provide a 20% buffer since there is nearly always a 20% uplift in the number of houses built on sites. 5% would be sufficient (South Woodham Ferrers Town Council)
- Supports the intention of CCC to fully meet its own housing needs within their administrative boundary including the 20% supply buffer and the use of the standard method (Essex County Council, Brentwood Borough Council, Uttlesford District Council, Rochford District Council, Maldon District Council)
- Disagree with a buffer and why 20% was chosen. The buffer is actually two buffers – rounding up to 1,000 dwelling per annum (dpa) plus an additional 20% buffer on top (Writtle Parish Council, Broomfield Parish Council, Great Waltham Parish Council, Boreham Parish Council)
- Any buffer should not be used to meet the needs of neighbouring authorities who are unable to meet their housing needs (Broomfield Parish Council)
- Community Land Trusts (CLTs), rural exception sites and the proposal for 'affordable housing sites adjacent to settlement boundaries' offer a better and more targeted way of meeting need, including Specialist Residential Accommodation (SRA), than increasing the buffer (Broomfield Parish Council)
- Disagree with having affordable housing on the edge of Defined Settlement Boundaries (DSBs) as it could lead to exclusion (South Woodham Ferrers Town Council)
- The list of parishes eligible for rural exception sites should be extended to include larger villages (Broomfield Parish Council)
- Will need to decide whether market housing should be used to support rural exception schemes as per paragraph 78 of the NPPF (Braintree District Council)
- More council-owned housing is needed and the site threshold for an affordable home requirement should be as low as possible (Great Waltham Parish Council)
- A 50% affordable home requirement on all sites would mean less allocations having to be made (South Woodham Ferrers Town Council)
- Welcomes the acknowledgement of the need to consider addressing the housing needs of specific groups within DM1, which may lead to the need to plan for a higher number than the standard method requirement (Essex County Council)
- The housing requirement should not be increased further to meet the needs of specific groups (South Woodham Ferrers Town Council)
- Work needs to be done to bring back empty properties into occupation (Great Waltham Parish Council)
- Support the intention to require higher standards for targeted, evidenced groups but encourage the application of the highest energy efficiency standards across all new homes and especially where the residents are anticipated to be the more vulnerable to fuel poverty and/or rising energy costs (Uttlesford District Council)

- The consideration of the need for home working should be considered as part of the Strategy Housing Market Assessment (SHMA) (Essex County Council)
- Local allocations through neighbourhood plans would ensure that development is located in the most appropriate locations and that infrastructure requirements are best suited to local circumstances (Broomfield Parish Council)
- A housing requirement for Designated Neighbourhood Areas only if applied to all neighbourhoods according to a common formula and replaces the current approach where developments of more than 100 dwellings are allocated as strategic sites through the Local Plan (Broomfield Parish Council)
- Support new or amended policies that help to deliver sufficient affordable homes, including for healthcare workers and more accessible and adaptable homes that assist residents to stay in their homes for longer as their needs change (Mid and South Essex Integrated Care Board, South Woodham Ferrers Town Council)
- There should be an enhanced commitment to pre-development engagement with local communities and their representatives (Great Waltham Parish Council)
- Support 10% of the housing requirement being on small sites (Essex County Council)
- 10% of the housing requirement being on small sites could be higher to support small construction companies (South Woodham Ferrers Town Council)
- Any new policy resisting inappropriate development in residential gardens needs to be consistent with the NPPF, paragraph 71 (Essex County Council)
- Support the reference to maintaining defined Urban Area and Defined Settlement Boundaries as a mechanism for identifying where certain development management policies apply (Essex County Council)
- Discounted market sales housing should remain at a discount for future eligible households. Clarification needed on the areas that are defined as local (Great Baddow Parish Council).

#### Summary of General Consultees Comments:

- Support for the suggested housing requirement (L&Q)
- Support for the housing requirement and 20% supply buffer (Home Builders Federation)
- Unmet needs from other Essex Authorities need to be considered (Home Builders Federation)
- Would like to see a bottom-up approach to identifying and meeting housing needs with villages being encouraged to meet their own needs through small sites. Community Land Trusts, rural exception sites and the 1 hectare sites mentioned in the document could help to deliver this approach (North West Parishes Group)
- Increasing the buffer will not necessarily lead to developments being achieved for specific groups in need (North West Parishes Group)
- There is less of a need for a 20% buffer with the Standard Method being in place (North West Parishes Group)
- 10% of the housing requirement being on small sites could be higher to support small and medium builders (Home Builders Federation)

- Allocation of affordable housing sites adjacent to DSBs may help manage landowner's expectations of land values. However, this would be housing for general needs and could be in conflict with the benefits that rural exception sites bring to the local community (CHP)
- Affordable housing on sites outside of DSBs should continue to come forward under the Council's standard Affordable Housing policy (L&Q)
- Any changes to the current requirements for 35% affordable housing split 63:37 affordable rent to affordable home ownership needs to be robustly viability tested and allow for flexibility to account for specific site and design constraints and opportunities (L&Q)
- Encourage consideration of what other exemption policies could apply, to allow provision of other affordable tenures on sites otherwise contrary to the development plan such as for other affordable tenures, as highlighted at 5.66 (L&Q)
- Specific allocations should be made to meet the needs of identified SRA and the need for older persons accommodation should be in the policy itself not in supporting text alone (Home Builders Federation).

#### Summary of Developer/Landowner/Agent Comments:

- The additional 54 additional dwellings on the 946 per annum in the Standard Method is not clearly explained or justified. The final housing requirement needs to be robustly evidenced (Martin Grant Homes, Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern), Bellway Strategic, Bellway Homes Ltd)
- Support the approach to provide above the minimum local housing needs figure calculated using the standard method (Gleeson Land, Croudace Homes, Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern), Dandara, Dandara Eastern, Dominvs Group, Obsidian Strategic Asset Management Ltd, Bolton, S&D, Persimmon Homes, Mr Alexander Micklem, Grosvenor Property UK and Hammonds Estates LLP, Bellway Strategic, Tritton Farming Partnership LLP, Medical Services Danbury, Mr J Bollingbroke, Marden Homes Ltd, Sempra Homes Ltd, Mr A Smith, Crest Nicholson, Richborough Estates, Hill Residential Ltd, Graham Dines, Miscoe Enterprises Ltd, The Bucknell family, A.G.&P.W.H Speakman, Chris Buckenham, Cliffords Group and Mr Mark Peters, Cliffords Group Ltd, Bellway Homes Ltd, Gladman Developments Ltd, Ptarmigan Chelmsford A Limited)
- The final housing requirement figure and resultant policies will need to demonstrate they are "flexible enough to accommodate needs not anticipated in the plan....and to enable a rapid response to changes in economic circumstances" (Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern), Gleeson Land)
- Consideration of a higher housing requirement to meet the needs of specific groups is supported (Gleeson Land, Grosvenor Property UK and Hammonds Estates LLP, Bellway Strategic)
- Unmet needs from other Essex Authorities and London should be considered in the SHMA and may need to be accommodated by CCC (Obsidian Strategic Asset Management Ltd, Bellway Strategic, Tritton Farming Partnership LLP, Medical Services Danbury, Mr J Bollingbroke, Marden Homes Ltd, Sempra Homes Ltd, Mr A Smith, Crest Nicholson)

- Unclear at this stage whether the housing numbers identified adequately takes account of jobs growth given updated evidence on the employment needs of Chelmsford are yet to be published (Pigeon (Sandon) Ltd)
- Support to continue the 20% supply buffer (Taylor Wimpey, Gleeson Land, Croudace Homes, Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern), Vistry Group, Dandara, Dandara Eastern, Wates Developments Ltd, Sedum Ltd, Dominvs Group, The Howgego Trust, Obsidian Strategic Asset Management Ltd, Bolton, S&D, Mr Alexander Micklem, Tritton Farming Partnership LLP, Medical Services Danbury, Mr J Bollingbroke, Marden Homes Ltd, Sempra Homes Ltd, Mr A Smith, Crest Nicholson, Hill Residential Ltd, Graham Dines, Miscoe Enterprises Ltd, The Bucknell family, A.G.&P.W.H Speakman, Chris Buckenham, Cliffords Group and Mr Mark Peters, Cliffords Group Ltd, H R Philpot & Sons, C J H Farming Ltd, Pigeon (Sandon) Ltd, Inspired Villages, Rosehart Properties Ltd, Gladman Developments Ltd, Pembridge Land Group, Ptarmigan Chelmsford A Limited, Richborough Estates)
- Do not support the 20% supply buffer (Taylor Wimpey Strategic Land)
- A higher buffer maybe able to be considered to account for affordability issues, London and surrounding authority's needs, and deliverability etc 20% should be the minimum (Tritton Farming Partnership LLP, Crest Nicholson, Pembridge Land Group, H R Philpot & Sons, C J H Farming Ltd, Mr and Mrs Richard and Sally Speakman, Medical Services Danbury, Mr J Bollingbroke, Marden Homes Ltd, Sempra Homes Ltd, Mr A Smith, Rosehart Properties Ltd, Croudace Homes)
- Endorse a proposed 10% buffer in supply of sites in the first five years (Miscoe Enterprises Ltd, A.G.&P.W.H Speakman, Chris Buckenham, Cliffords Group and Mr Mark Peters, Cliffords Group Ltd, Aquila Developments Ltd)
- SHMA needs to consider economic growth and job creation targets may drive the need for additional housing growth (Martin Grant Homes)
- SHMA needs to consider Affordable Housing need (Martin Grant Homes)
- Support the need for the SHMA to help inform the Plan (Bolton, S&D, Bellway Strategic, Richborough Estates, H R Philpot & Sons, Bellway Homes Ltd)
- Need for flexibility in housing mix policy and implementation to allow for changes in circumstances where current needs are considered to be different from those identified in the SHMA (Aquila Developments Ltd)
- DM1 needs to make a distinction between greenfield strategic allocations with individual housing plots and complex urban developments based around apartment typologies (Dominvs Group)
- Support exploring whether a different approach to the mix of market housing and whether the level, type and mix of affordable housing needs to change (Grosvenor Property UK and Hammonds Estates LLP)
- Policies with too precise a development mix run the risk of becoming rapidly out of date and inflexible to changes in housing need (Dominvs Group, Gleeson Land)
- Mix of market housing should be considered on a site-by-site basis to ensure the delivery of homes is appropriate for the immediate demographic and locational context (Chelmsford Garden Community Consortium)
- Any build to rent/single family housing policy needs to be addressed in the review with an evidence base that supports the tenure requirements. This

needs to be considered early on in any housing assessment evidence base (Chelmsford Garden Community Consortium, Dominvs Group)

- A robust assessment of affordable housing mix, in particular First Homes, should be undertaken. This should review the financial viability implications, as well as the impact on the availability of Shared Ownership units (Chelmsford Garden Community Consortium)
- Numbers in the 2022 Housing Trajectory do not appear to tally with the numbers of completions, allocations, permissions and windfalls in the document (Martin Grant Homes)
- Average past annual delivery rates do not appear to justify the high annual delivery rates projected in the Housing Trajectory (Martin Grant Homes)
- Housing Trajectory published does not include a detailed breakdown of all sites it relies upon. This should be included (Martin Grant Homes)
- The components of the housing supply will need to be fully evidenced and justified (Vistry Group)
- There is no updated housing land supply evidence to justify the absence of exceptional circumstances for a Green Belt Review (Taylor Wimpey Strategic Land)
- Support for the identification of small windfall sites to help meet the overall housing need (London & Cambridge Properties Ltd)
- An over-reliance on large strategic scale sites may jeopardise the projected delivery rates over the Plan period (Dandara)
- Potential for a higher housing figure to deliver the amount of Affordable Housing needed is supported (Gleeson Land, Aquila Developments Ltd)
- New sites need to ensure they can viably provide the amount of Affordable Housing needed (Gleeson Land)
- Concern if the overall percentage requirement for affordable housing increases above existing thresholds without robust evidence and viability testing (Ptarmigan Chelmsford A Limited)
- Amending the threshold for Affordable Homes to 10 dwellings, as set out in national policy is supported (Bellway Strategic)
- Any policies that exceed national policy expectations e.g. housing mix and tenure must be justified and fully tested in the evidence base, including in need and viability assessments (Taylor Wimpey)
- Support approach to identifying needs of different groups, including elderly people, and land to meet these needs (Sedum Ltd, Grosvenor Property UK and Hammonds Estates LLP)
- Specific allocations for all forms of elderly persons accommodation, including affordable, should be made in the Plan to ensure certainty to meet identified needs (Sedum Ltd)
- DM1 does not sufficiently cover SRA. Any equivalent new policy must be based on a robust evidence base that identifies the housing requirements of specialist housing for older people and distinguishes between C3 and C2 (Inspired Villages)
- The Plan should include a housing requirement figure for designated neighbourhood areas, unless site allocations are made in the Local Plan, as it is not reasonable for sites in such settlements to be identified through the Neighbourhood Plan process due to the time these take (Landvest Developments Ltd, Richborough Estates, Obsidian Strategic Asset Management Ltd, Stonebond (Chelmsford) Ltd, Vistry Group)



- Support allocating smaller sites to deliver at least 10% of the housing requirement (Landvest Developments Ltd, Edward Gittins Associates, Mr Alexander Micklem, Cliffords Group Ltd)
- Consider increasing the smaller sites requirement to 15% of the housing requirement (Miscoe Enterprises Ltd, H R Philpot & Sons, C J H Farming Ltd)
- Providing a mix of sites, including small and medium, will help the supply in meeting the needs of different groups, as well as providing a more robust approach to maintaining delivery (Wates Developments Ltd, Bellway Strategic, Stonebond Properties Ltd, Bellway Strategic, Stonebond (Chelmsford) Ltd)
- Reference to and the allocation of medium size sites should be made (Rosehart Properties Ltd, Pembridge Land Group, Croudace Homes)
- Support identifying developable sites or broad locations for growth over years 6-10 and 11-15 of the plan period allowing larger sites to come forward later in the trajectory (Miscoe Enterprises Ltd)
- Agree with the key outputs listed in para 5.56 of the document (A.G.&P.W.H Speakman, Chris Buckenham, Cliffords Group and Mr Mark Peters, Cliffords Group Ltd, Rosehart Properties Ltd)
- Disagree with having affordable housing on the edge of DSBs as it could lead to exclusion (Bellway Strategic)
- Include policies to encourage housing in the city centre and supportive policies for Build-to-Rent homes (Dominvs Group)
- A Green Belt Review is needed to meet needs (Taylor Wimpey Strategic Land, Vistry Group, Rosehart Properties Ltd, Charterhouse Property Group & Charterhouse Strategic Land, Pembridge Land Group)
- A review of Green Wedges is needed to allow for some development within them (Obsidian Strategic Asset Management Ltd).

#### Summary of Public Comments:

- Unclear how the overall number of new homes and existing built or planned homes is derived
- The number of new homes being built is too many and there is too much loss of open countryside to facilitate them
- People need to consider living elsewhere if there are no homes available or they cannot afford to live in the area
- All unoccupied homes should be considered
- Affordable housing should be in the context of buying using local salaries for local jobs, not local salaries for jobs in London
- Affordable homes should be built to the same standard as all houses
- More affordable homes are needed
- Can anything be done to assist people in getting a deposit for a home?
- There should be no first homes exceptions
- The wait list for affordable rented housing is much too long
- Support for small sites for affordable homes outside DSBs for local people
- The 20% buffer and all other types of housing required need to be balanced against the requirements of other strategies of the Council, e.g sustainability; protecting the natural environment, etc

- 1,000 homes per year plus a 20% supply flexibility buffer means an increase to nearly 27% on the new minimum which seems excessive, and it is unclear how it is justified
- The city's infrastructure cannot take more homes and the provision of housing is not in line with infrastructure needs or provision, which need to be provided alongside the housing
- There is no detail on how any of the points raised in the NPPF on Rural Housing will be addressed
- Older people should be identified as a specific group in the SHMA and have specific allocations made to address this group's needs rather than wrapped up in SRA
- M4 housing should not be regarded as an alternative to delivering the necessary amount of SRA as it does not deliver on the many wider benefits, such as addressing issues of loneliness and social isolation
- DM1 (c) is far too restrictive and does not allow support for one off SRA developments on the edge of DSBs
- All developments of 50+ should include down-sizing for older people
- Policy needs to be flexible to encourage the delivery of older people's housing in sustainable and well-connected locations
- The need for student accommodation should be considered
- Building within gardens should not be dismissed as the local facilities are often in place to sustain them
- The volume of planning applications in rural areas is becoming unmanageable
- Look at plots for modular housing that can relatively quickly be made available
- Consider higher density development.

### **Our evidence says**

The Strategic Housing Needs Assessment (SHNA) (2023) studies the overall housing need set against the NPPF and the framework of National Planning Practice Guidance, specifically the Standard Method for assessing housing need. It shows a need for 955 dwellings per annum based on household growth of 631 per annum and an uplift for affordability of 51%.

The SHNA (2023) considers whether there are exceptional circumstances to move away from the Standard Method in either an upward or downward direction. The assessment considers whether more recent demographic trends, including 2021 Census data and ONS mid-year population estimates up to 2021 are substantially different to the 2014-based projections. The assessment notes that whilst there are differences these are not considered to be substantial and do not point to any exceptional circumstances.

The SHNA (2023) reviews past build rates as areas with strong growth might be able to provide more homes than the Standard Method. Whilst delivery has been strong in Chelmsford, the assessment concludes that past build rates do not provide any evidence to suggest a higher or lower figure than the Standard Method.

The Standard Method projection was used to look at potential changes to the resident labour supply and the number of additional jobs that might be supported. Overall, it was projected the labour supply would increase by around 21% over the 2022-41 period and that this could support around 21,000 additional jobs – this is above an economic forecast (just over 12,400 jobs for the same period) and again

## Our evidence says

points to there being no need to plan for housing in addition to the Standard Method.

The SHNA (2023) suggests a need for 623 affordable homes per annum across the City Council area. The assessment concludes that whilst there is a notable need for affordable housing, and provision of new affordable housing is an important and pressing issue in the area, this high figure does not point to any requirement for the Council to increase the Local Plan housing requirement as many of those assessed as having an affordable housing need are already in housing and therefore do not generate a net additional need for a home.

The SHNA (2023) sets out that there are a range of factors which will influence demand for different sizes of homes, including demographic changes; future growth in real earnings and households' ability to save; economic performance and housing affordability. In all sectors the analysis points to a particular need for 2-bedroom accommodation, with varying proportions of 1-bedroom and 3+-bedroom homes. For rented affordable housing there is a clear need for a range of different sizes of homes, including 40% of general needs housing to have at least 3-bedrooms.

In terms of specific housing needs other than affordable housing, the SHNA (2023) notes that the older person population is projected to increase notably moving forward. The assessment concludes that an ageing population means that the number of people with disabilities is likely to increase substantially.

The SHNA (2023) has not attempted to estimate the need for additional private rented housing. It is likely that the decision of households as to whether to buy or rent a home in the open market is dependent on several factors which mean that demand can fluctuate over time; this would include mortgage lending practices and the availability of Housing Benefit.

The Local Plan Viability Report (2023) tests the high-level viability of different typologies of development sites that could come forward through Local Plan allocations through multiple development appraisals. Several sets of appraisals have been run, including a varied affordable housing requirement, varied levels of environmental standards and varied developer contributions. The appraisals use the residual valuation approach. They assess the value of a site after considering the costs of development, the likely income from sales and/or rents and a developers' return. The Residual Value represents the maximum bid for the site where the payment is made in a single tranche on the acquisition of a site. For the proposed development to be viable, it is necessary for this Residual Value to exceed the Existing Use Value (EUV) by a satisfactory margin, being the Benchmark Land Value (BLV).

The Base appraisals in the Local Plan Viability Report (2023) reflect the Council's current policy requirement, updated for national changes. These show that across the greenfield sites, the Residual Value exceeds the BLV in all cases, suggesting that such development is likely to be viable on the basis tested. On brownfield sites within Chelmsford and the wider Borough, the Residual Value is generally above the BLV, suggesting that such development is likely to be viable. The exception is in relation to flatted development which is most likely to come forward in central Chelmsford. This is not shown as viable with the Residual Value being less than the BLV, and for the higher density typologies, less than the EUV. Whilst the value attributed to flatted development is significantly greater than for housing development, this is more than offset by the greater costs associated with flatted

**Our evidence says**

development and the necessity to reflect the circulation space (stairs and lifts) in the modelling. The values in the South Woodham Ferrers areas are less than in the wider Borough and the Residual Values are proportionately less than in the wider Borough. In this area greenfield development is shown as viable but brownfield development (housing and flats) is not.

The Local Plan Viability Report (2023) modelling includes the 7 potential strategic sites. On all these the Residual Value exceeds the BLV suggesting that these are likely to be forthcoming.

The Local Plan Viability Report (2023) appraisals assume developer contributions and CIL. On the potential strategic sites, these vary from £25,000 per unit to £50,000 per unit (in addition to Community Infrastructure Levy (CIL)). As and when the actual strategic sites are identified and modelled, it will be necessary to test them against their strategic infrastructure and mitigation requirements identified through the Infrastructure Delivery Plan (IDP).

Sets of appraisals in the Local Plan Viability Report (2023) have also been run to establish the costs of the additional policy requirements. The starting place for this analysis is the recent and emerging national standards, including the 2025 increase to Part L of Building Regulations, the mandating of Accessible and Adaptable standards under Part M of Building Regulations, mandatory Electric Vehicle Charging and the Council’s requirement for 20% biodiversity net gain. The analysis shows that, on average, assuming 35% affordable housing, across the typologies, the Residual Value is about £110,000/ha less where the affordable housing for rent is provided as Social Rent rather than Affordable Rent. The consequence of this is that should the Council seek that all the affordable housing for rent is as Social Rent, the developer could typically afford to pay a landowner about £110,000/ha less than where the affordable housing for rent is as Affordable Rent. This is a significant difference that has the impact of reducing the scope for affordable housing provision by about 5%, although the impact varies considerably across the different typologies.

In the Local Plan Viability Report (2023) a range of developer contribution costs ranging from £0 to £60,000 per unit has been tested against 0% to 45% affordable housing requirements.

In the Local Plan Viability Report (2023) the effects of affordable housing and developer contributions are tested in three scenarios:

	<b>Lower Requirements</b>	<b>Mid Requirements</b>	<b>Higher Requirements</b>
	Being as per the minimum existing and emerging national standards		Including most of the items tested
<b>Biodiversity Net Gain</b>	10%	20%	20%
<b>Carbon and Energy</b>	2025 Part L	Zero Carbon	Zero Carbon

**Our evidence says**

<b>Accessibility</b>	100% M4(2) Accessible & Adaptable	95% M4(2) - Accessible & Adaptable 5% M4(3)a Wheelchair Adaptable	95% M4(2) Accessible & Adaptable 5% M4(3)b Wheelchair Accessible
<b>Water Standard</b>	Enhanced Building Regulations	Enhanced Building Regulations	Enhanced Building Regulations with Rainwater Harvesting
<b>CIL</b>	As adopted	As adopted	As adopted

The amount of development required during the Plan period 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 Green Wedge evidence base reports support the policies in the Preferred Options Local Plan and notations on the draft Policies Map for the Green Wedge.

The Preferred Options IIA 2024 considers that the approach would meet in full, and exceed, the assessed housing requirement over the Plan period, in accordance with the objective of the NPPF to boost supply. Overall, the development requirements are expected to have a significant positive effect on housing.

The Equality Impact Assessment (EqIA) conducted as part of the Preferred Options IIA 2024 records positive effects of policies relating to housing types and affordability options to meet the needs of protected groups including the disabled, young and elderly people.

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Policy S6 (Housing and Employment Requirements) has been assessed using the Standard Method and the SHNA (2023) has affirmed that this is a reasonable assessment of housing need for Chelmsford. The Standard Method calculation varies each year and has averaged 953 homes per annum since the publication of the formula in 2018. To plan to meet only the minimum local housing need figure produced by the Standard Method would not significantly boost the supply of homes. The City Council declared a housing crisis in Chelmsford in February 2022 and levels of homelessness continue to rise. Consequently, the Council proposes a Housing Requirement figure of 1,000 homes per annum for the plan period 2022-2041 to address the variation in the calculation of the Standard Method and the rising levels of homelessness within the administrative area of the City Council.

Policy S6 (Housing and Employment Requirements) includes a supply buffer of 20% to provide flexibility in the supply of housing sites. Provision is made for 22,567 new homes during the period 2022-2041 however when allowance is made for existing housing completions, existing planning permissions, existing Local Plan allocations to 2036 and windfall projections the residual new Local Plan Allocations for the period to 2041 is 3,862 new homes. The range of site allocations, including new sites, is set out in Policy S7 (The Spatial Strategy).

There are four designated neighbourhood areas with plans in progress. The Preferred Options Local Plan continues to set out a housing requirement of 100 new dwellings for Danbury designated neighbourhood area. Broomfield and

## The Preferred Options Local Plan

Boreham are not being considered for new housing growth in the preferred Spatial Strategy. East Hanningfield does fall within the overall strategy options for growth but a housing requirement has not been requested by the Neighbourhood Plan body.

Policy S7 (The Spatial Strategy) provides information on the proposed location of the housing required and the range of site types.

Policy S7 (The Spatial Strategy) continues to include a housing supply buffer of close to 20% to meet the housing requirement. This is justified as previous Plan periods in Chelmsford have included a similar supply buffer but there has been no oversupply of housing.

Policy S7 (Spatial Strategy) provides support for residential development on private residential gardens where development would not cause harm to the local area and where they are in accordance with other relevant policies of the plan.

Policy DM1 (Size and Type of Housing) provides the range of housing required taking into account demographic change. The percentage range provides greater flexibility on individual sites and the Reasoned Justification acknowledges site location and area character are also relevant consideration when negotiating the mix of housing types on individual development sites.

The SHNA 2023 follows the approach set out in the latest published National Planning Policy Framework (NPPF) and supporting Planning Practice Guidance (PPG).

Policy DM1 (Size and Type of Housing) increases the requirement for new dwellings to achieve requirement Part M, Category 2 (Accessible and adaptable dwellings) M4(2) of Schedule 1 (para 1) to the Building Regulations 2010 (as amended) to create sustainable developments for the future as well as address the findings of the SHNA (2023) that an ageing population means that the number of people with disabilities is likely to increase substantially.

Policy DM1 (Size and Type of Housing) does not specifically address Build to Rent schemes as the Local Plan Viability Report (2023) shows flatted development of this type is not viable and the SHNA notes that the need for additional private rented housing is dependent on several factors including mortgage lending practices and the availability of Housing Benefit, which fluctuate over time.

Policy DM1 (Size and Type of Housing) maintains the same approach to custom- and self-build housing in line with the recommendations in the SHNA (2023).

Policy DM1 (Size and Type of Housing) provides a flexible way to meet a range of Specialist Residential Accommodation needs. The application of this policy will refer to the latest assessments of local housing need to prioritise the greatest housing need for Specialist Residential Accommodation within the plan period. The increase in the requirement for new dwellings to achieve requirement Part M, Category 2 (Accessible and adaptable dwellings) M4(2) of Schedule 1 (para 1) to the Building Regulations 2010 (as amended), will help to address the fact that the number of people with disabilities is likely to increase substantially with an ageing population for those older persons that do not wish to live in Specialist Residential Accommodation.

Policy DM2 (Affordable Housing and Rural Exception Sites) retains a requirement for the provision of 35% of the total number of residential units to be provided as affordable housing consisting of 70% affordable rent capped at Local Housing Allowance levels, 25% First Homes provided at the 30% discount against market

## The Preferred Options Local Plan

value and the balance as shared housing. This equates on a whole site basis to 24.5% affordable rent, 8.75% First Homes and 1.75% shared ownership housing. The threshold has been reduced to comply with the NPPF definition of Major Development. The Local Plan Viability Report (2023) demonstrates that the threshold and the amount and type of affordable housing is justified.

Policy DM2 (Affordable Housing and Rural Exception Sites) includes a requirement for a specific mix of affordable homes for rent to meet the needs identified in the SHNA (2023).

National Policy - Policy DM2 (Affordable Housing and Rural Exception Sites) includes three exceptional circumstances in which small sites will be released for housing that would not otherwise be released for housing, to accord with the NPPF. The rural housing exception site part of the policy is linked to locations that are determined by The Housing (Right to Acquire or Franchise) (Designated Rural Areas in the East) Order 1997 (SI 1997/623) and The Housing (Right to Enfranchise) (Designated Protected Areas) (England) Order 2009 (SI 2009/2098).

The Planning Obligations SPD will be reviewed, and any appropriate changes/additions included. This will include additional text from some of the published Planning Advice Notes.

The Planning Advice Notes that provide more detailed housing needs information will be reviewed and updated as appropriate.

Further information on the approach to housing is set out in the Preferred Options Housing Topic Paper.

## Gypsy and Traveller Accommodation

Key statistics:

Question	Yes	No	Comments	Total number of responses
<b>33. Do you support the approach being taken? If you disagree, please explain why?</b>	18	6	14	38
<b>34. Do you have any views on the Council's current Gypsy, Traveller and Travelling Showpeople policies and the decisions they lead to?</b>	N/A	N/A	16	16
<b>35. Have we missed anything? Where possible, please support your answer with reference to any evidence.</b>	N/A	N/A	10	10

#### Summary of Specific and DTC consultees comments:

- Support for the approach and expect CCC to meet its own accommodation needs for this group through appropriate allocations (Essex County Council, Braintree District Council, Great Waltham Parish Council)
- If any needs are not able to be met CCC would need to follow the Essex Planning Officers' Association (EPOA) Mechanism for the consideration of Unmet Gypsy and Traveller Need (2018)) as would any authority seeking CCC to accommodate any of its unmet need for this group (Essex County Council)
- Consideration should be given to the allocation of sites outside of residential growth allocations provided they are in sustainable locations (Braintree District Council)
- More specific reference to the need for Transit sites may be needed (Braintree District Council)
- A better explanation of para 8.24 of the existing Plan is required for Policy DM3 (South Woodham Ferrers Town Council).

#### Summary of General Consultees Comments:

- A new Gypsy and Traveller Accommodation Assessment (GTAA) needs to be undertaken as it is out of date (The Showmen's Guild of Great Britain London and Home Counties)
- Welcome new sites being included within new strategic allocations but request that local Showpeople and local residents, as well as the Guild are involved in the design to ensure they provide suitable sites (The Showmen's Guild of Great Britain London and Home Counties)
- A positive criteria-based policy approach towards other sites, outside strategic allocations, is also needed (The Showmen's Guild of Great Britain London and Home Counties)
- Consider taking sites out of the Green Belt where they are not of great Green Belt value (The Showmen's Guild of Great Britain London and Home Counties)
- Welcome a review of the needs for this group and the allocation of sites (CHP).

#### Summary of Developer/Landowner/Agent Comments:

- Additional requirements to accommodate this groups needs within new residential allocations needs to be the subject of appropriate needs and viability testing (Taylor Wimpey)
- Question the appropriateness of continuing to include provision for this group within strategic allocations and suggests specific standalone site allocations are made outside of the strategic allocations instead (Obsidian Strategic Asset Management Ltd, Gleeson Land)
- Objection to the allocation and planning permission granted at Drakes Lane (W & H Marriage & Sons Limited).



## Summary of Public Comments:

- Important for the Council to provide for these groups
- The Council should engage with these groups as part of the Local Plan process
- Impact on surrounding local residents from such sites needs to be considered
- Suggest a site outside of strategic allocations would be more suitable and developers could pay towards funding it
- There is a lot of NIMBYism to proposed sites
- There is a need for more suitable short-term and longer-term sites, properly equipped/serviced
- Unfamiliar with the demand for accommodation for these communities.

### **Our evidence says**

The provisional findings of the Gypsy and Traveller Accommodation Assessment (2024) that covers the period 2023 to 2041 identifies a need for a range of between 36 and 77 Gypsy and Traveller pitches and 25 Travelling Showpeople plots within Chelmsford.

The need for transit sites has not yet been established and will be confirmed when the Essex wide Gypsy and Traveller Accommodation Assessment (2024) has been completed for all the Essex authorities.

The Preferred Options IIA 2024 considers that the approach would the requirements for Gypsies and Travellers and Travelling Showpeople over the Plan period. Overall, the development requirements are expected to have a significant positive effect on housing.

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Policy S6 (Housing and Employment Requirements) reports the provisional findings of the Gypsy and Traveller Accommodation Assessment (2024) for Chelmsford. The Reasoned Justification notes that the Council will expect to see Gypsy and Traveller Pitches and Travelling Showpeople accommodation provided on all suitable large strategic development allocations.

Policy S7 (The Spatial Strategy) provides information on the proposed location of 30 Gypsy and Traveller pitches and 25 Travelling Showpeople plots.

Policy DM1 Cii (Size and Type of Housing) requires the provision of Specialist Residential Accommodation within all development of more than 100 dwellings. This includes gypsy and traveller needs identified in the Gypsy and Traveller Accommodation Assessment (2024) and not met through site allocations.

A criteria-based approach already exists in Policy DM3 (Gypsy, Traveller and Travelling showpeople sites, which includes considerations such as a suitable living environment, service provision, no adverse impact on the amenity of nearby residents and safe/convenient vehicular access.

The Planning Obligations SPD will be reviewed, and any appropriate changes/additions included.

The Travelling Showpeople Sites Planning Advice Note that provides advice on the design and layout of Travelling Showpeople provision will be reviewed to determine if it should be incorporated in the Planning Obligations SPD.

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Further information on the approach to Gypsy and Travellers and Travelling Showpeople is set out in the Preferred Options Housing Topic Paper.

### 6 Fostering growth and investment and providing new jobs

#### Jobs/Employment and Economic Growth

Key statistics:

Question	Yes	No	Comments	Total number of responses
<b>36. Do you support the approach being taken? If you disagree, please explain why?</b>	28	4	23	55
<b>37. Do you have any views on the Council's current employment policies and the decisions they lead to?</b>	N/A	N/A	17	17
<b>38. Do you have any views on the key economic and employment related issues identified so far?</b>	N/A	N/A	27	27
<b>39. Have we missed anything? Where possible, please support your answer with reference to any evidence.</b>	N/A	N/A	24	24

Summary of Specific and DTC consultees comments:

- Support expressed in general for the approach (Essex County Council, Braintree District Council, Basildon Borough Council, Brentwood Borough Council, Rochford District Council, South Woodham Ferrers Town Council, Writtle Parish Council, Broomfield Parish Council, Rochford District Council, Great Waltham Parish Council)
- The issue 'Allocating additional employment space to meet future needs' should be expanded to clarify that quality is as important as quantity. Existing employment sites should not simply be rolled forward particularly where there is no reasonable prospect of particular sites being used for such purposes (Essex County Council)
- The Town and Country Planning Association's (TCPA's) Garden City Principles should continue to be integral to the more detailed design of Chelmsford Garden Community (Essex County Council)
- The plan is Chelmsford City Centre focused with no mention of South Woodham Ferrers which is receiving the highest proportion of residential growth but negligible employment opportunities, leading to higher levels of commuting (South Woodham Ferrers Town Council)

- Policy DM4 should be revised to refer to the need for affordable start-up accommodation, Policy DM23 should require the Essex Design Quality Review Panel to be used for large employment areas, and Policy DM24 should make it clear that the principles listed which all new major development should reflect relate to employment uses as well as residential developments (Essex County Council)
- Paragraphs 5.73 and 5.77 which refer to various sector specialisms lacks commentary on typical occupier needs (Essex County Council)
- CCC should consider the need to remove permitted development rights to help retain new employment space in the longer term. Provision of employment along strategic transport networks such as the A12 should also be supported (Braintree District Council)
- Sites to meet local business and community needs in rural areas may have to be located adjacent to or beyond existing settlements. Decisions should exploit opportunities to make a location more sustainable and the use of previously developed land, and sites physically well-related to existing settlements should be encouraged (Essex County Council)
- Economic development should integrate smoothly in rural areas without disrupting its existing character such as small businesses operating former agricultural premises (Great Waltham Parish Council)
- The plan needs to ensure that rural areas are supported by both the fastest broadband possible and EV charging facilities (Great Waltham Parish Council)
- Home working and internet connectivity needs to be considered as part of the review (see the Digital Strategy for Essex) and issues relating to viability should be considered in the employment needs study to be commissioned (Essex County Council)
- The role of agriculture and rural businesses in the local economy and opportunities for residents to establish micro-businesses and work from home should be emphasised (Chignal Parish Council)
- Village halls may have a role in supporting homeworking by providing affordable meeting rooms for home workers, to enable networking and reduce the danger of social isolation (Broomfield Parish Council)
- More emphasis is needed on supporting the green economy and better incentives to encourage retrofitting and adapting existing buildings to reduce heat-loss and energy (South Woodham Ferrers Town Council)
- The review should address the need for economic growth and job creation, and to take account of and seize opportunities to grow the linkages between the Chelmsford economy and the South Essex economy. Relevant projects are the Thames Freeport and Lower Thames Crossing, which are likely to create both direct and indirect growth in jobs and supply chains beyond the boundaries of South Essex (Brentwood Borough Council, Rochford District Council)
- Thames Freeport needs to be reflected in the Local Plan. Joint working between The Association of South Essex Local Authorities and CCC is necessary (Castle Point Borough Council).

Summary of General Consultees Comments:

- General support expressed for the approach (Newlands Springs Residents Association, Chelmer Housing Partnership).

Summary of Developer/Landowner/Agent Comments:

- Support expressed in general for the approach (C J H Farming Ltd, Dominvs Group, Hill Farm (Chelmsford) Ltd, Cliffords Group Ltd, David Lloyd Leisure and Aquila Development Ltd, Rosehart Properties Ltd, Pembridge Land Group, Gray & Sons, Gladman Developments Ltd, Taylor Wimpey, Grosvenor Property UK and Hammonds Estates LLP, Gray & Sons, Mr & Mrs Andrew Parker
- Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (Tritton Farming Partnership LLP)
- Additional emphasis needed on Chelmsford City Centre as being a key economic driver for employment for which growth should be directed (Dominvs Group)
- Allocate sufficient sites with good access to the strategic road infrastructure and accessible by sustainable modes of travel (Tritton Farming Partnership LLP)
- Provide choice and flexibility in allocating a wide range of employment opportunities in Chelmsford in proximity to housing (Rosehart Properties Ltd)
- A holistic approach to be encouraged for the provision of employment opportunities in tandem with childcare, housing, local facilities and services, in order to facilitate easier working patterns for all (Grosvenor Property UK and Hammonds Estates LLP)
- Employment policies should be coordinated to ensure that homes are located in areas with easy access to jobs and public transport, therefore development within the city centre should be encouraged as part of the overall economic strategy (Dominvs Group)
- The almost exclusive focus on strategic sites to meet employment requirements fails to secure much needed new floorspace and delays its delivery. Allocations need to be significantly more flexible in scale and type to secure the full range of employment opportunities (Aquila Developments)
- Employment policies should provide choice and flexibility in allocating a wide range of employment opportunities in Chelmsford. There should be clear links between development and the provision of jobs. Sites should be prioritised that would be directly accessible to employment provision thus not reliant on the car for commuting consistent with the NPPF (Wates Development Limited)
- Support for the role of Chelmsford Garden Community (CGC) in boosting and securing economic growth, by the development of new employment floorspace as an integral part of the CGC masterplan (Ptarmigan Chelmsford A Limited)
- Support CCC's aim to promote economic growth including concentrating large new scale employment development sites as part of strategic new development sites on the edge of Chelmsford Urban Area (Taylor Wimpey)
- Economic growth should be supported in the towns and villages, as well as the city and the rural areas (Obsidian Strategic Asset Management Ltd)
- It is critical to ensure that adequate job opportunities and provision of employment generating uses/development come forward outside of the main

city centre and urban area capturing local demand amongst rural communities, this should be reflected in the development strategy (Cliffords Group Ltd, David Lloyd Leisure and Aquila Development Ltd)

- CCC should bring forward environmental benefits, green infrastructure and BNG through certain economic uses that are harmonious with the countryside, such as garden nurseries and tree planting (Cliffords Group Ltd)
- Local economic policy should seek to positively enhance the quality of jobs for the local community and empower hard to reach groups (Dominvs Group)
- Policies currently lack reference to enable business uses particularly outside of DSBs or allocated employment areas in line with the NPPF (Mr N Halls)
- Policies currently play insufficient attention to the requirement for conventional industrial / distribution shed space which previous studies have recognised in their aspiration for either neighbourhood integration of Small and Medium Sized Enterprises (SMEs) or attraction of high technology sectors (Aquila Developments)
- Due to current trends in post-Covid working practice, new homes should provide specific space for homeworking and high-speed internet (Pembridge Land Group)
- The needs of the logistics sector are not acknowledged in Policy S8, hence there is a lack of allocated sites to meet the needs of this growing sector. Opportunities should also be sought along the strategic road network outside Chelmsford administrative area as part of e.g. Essex Economic Board and London (Greystoke CB)
- The delivery of leisure facilities can also be valuable sources of employment by offering a diverse range of job opportunities especially where they have a mix of ancillary uses such as retail, food and drink supporting the core leisure uses (Cliffords Group Ltd, David Lloyd Leisure and Aquila Development Ltd)
- There is no detail in the consultation document of the flexible rolling employment land supply across the plan period as indicated in the IIA (5.4.2) (Tritton Farming Partnership LLP)
- Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (Writtle University College).

#### Summary of Public Comments:

- Some general support for the proposed approach
- Focus is on small employers; how will large employers be supported?
- Support is needed to encourage businesses to set up and locate to Chelmsford. Hundreds of office blocks are empty because of high business rates and council tax
- Employment to be provided at all skill levels
- Need to recognise high number of residents commuting to London and not drive housing demand by building more business space
- Providing facilities where people from different businesses can share working spaces or premises as well as supporting services is good but also needs to include shared equipment like that found in “MAKERSPACE” or “HACKSPACE” facilities in Colchester and Southend
- Consider additional costs of home working (electricity and heating) and impact on mental well-being for solitary home workers. Work hubs would alleviate

some of these issues but having them only in the city centre would create a village/city divide

- Consider the lasting effect of the Covid lockdown on employment sites, working from home, hotelling/hotdesking
- The promotion and facilitation of future proof broadband is critical in attracting employers, and assisting new start-ups. Homeworking is more challenging without excellent connectivity
- It is hard to see how, in some areas, the 15/20 minute walk for residents to open spaces could be achieved with the planned industrial employment development
- Question if new industrial areas are required when we have many empty offices including a large building on Parkway
- Policies may not provide work nearby for the expanding Chelmsford
- Concern over lack of quantification of contribution of each policy
- Question how delivery will be funded
- Support for cottage based industries that may require extending their present home.

### **Our evidence says**

The Employment Land Review 2023 considers the employment needs arising from economic and employment growth in Chelmsford to 2041. The review encourages the delivery of more industrial land across Chelmsford as a shortfall was identified through quantitative analysis.

The Employment Land Review 2023 reviews existing Employment and Rural Employment Areas and finds it reasonable for them to continue to be protected for employment uses. It also recommends that future Local Plan policy identify the need for infrastructure improvements across the main employment locations and future allocations to support the identified intensification opportunities on employment land.

National policy - A significant reform of The Use Class Order was announced in July 2020 with effect from September 2020. A new use class, a broad Use Class E (commercial, business and service), was formed merging the former Use Classes labelled A1, A2, A3, B1, B2, D1 and D2.

The Preferred Options IIA 2024 considers that the approach will have a significant positive effect in respect of the economy, which will help to maintain and enhance Chelmsford's strategic economic role, support existing businesses and attract inward investment.

### **The Preferred Options Local Plan**

In line with the Employment Land Review 2023, new strategic employment development is promoted along strategic transport networks including the A12 – Policy SGS16a (East Chelmsford Garden Community) and Policy SGS16b (Land Adjacent to A12 Junction 18 Employment Area). New employment is also promoted in Chelmsford City Centre which is highly accessible by public transport. There are also two smaller allocations in the rural area meeting more local demand for employment floorspace.

## The Preferred Options Local Plan

No new residential or employment site allocations are proposed for South Woodham Ferrers in the Preferred Options Local Plan over and above those allocated in the adopted plan.

Most existing designated Employment Areas and Rural Employment Areas are proposed to remain in employment use in line with recommendations in Employment Land Review 2023. Exceptions are Kay Metzeler, Brook Street and Marriages Mill, Hoffmans Way as these may no longer be viable for employment and are promoted for residential development in the Preferred Options Local Plan.

National policy - Policy S6 (Housing and Employment Requirements) and DM4 (Employment Areas and Rural Employment Areas) are updated to reflect changes to the Use Class Order including a new Use Class E(g), formerly Use Class B1.

Policy S8 (Delivering Economic Growth) introduces a requirement for Employment and Skills Plans for strategic scale proposals to improve local skills and access to employment opportunities. The policy is amended to reflect updated the employment growth sectors and to reflect the merger of Writtle University College and Anglia Ruskin University College.

Policy DM4 (Employment Areas and Rural Employment Areas) is updated with new/amended criteria to protect neighbouring uses and ensuring uses are appropriate to their location and not detrimental to the local transport network. The policy also promotes infrastructure improvements in designated employment areas, to reflect the Employment Land Review 2023, and sustainable and active travel opportunities.

### Strategic Priorities for Place

#### 7 Creating well designed and attractive places, and promoting the health and social wellbeing of communities

##### Community assets

Key statistics:

Question	Yes	No	Comments	Total number of responses
<b>40. Do you support the approach being taken? If you disagree, please explain why?</b>	27	3	22	52
<b>41. Do you have any views on the Council's current community asset policies and the decisions they lead to?</b>	N/A	N/A	16	16
<b>42. Have we missed anything? Where possible, please support your answer with reference to any evidence.</b>	N/A	N/A	18	18

#### Summary of Specific and DTC consultees comments:

- Needs to be more commitment to provision of community assets including primary schools, play areas and community centres for South Woodham Ferrers (South Woodham Ferrers Town Council)
- Retention of community facilities is supported (Braintree District Council)
- Consider role of Broomfield Hospital in the wider area including access by a variety of transport options from outside the authority's area (Braintree District Council)
- Strongly support ensuring sufficient school and nursery places are provided through either expanding existing or building new schools (Essex County Council)
- Adequate provision of complementary community assets is often an area for concern (Great Waltham Parish Council)
- New developments create additional pressure on local transport, educational, health and recreational assets. This can be a matter of timing, but there also seems to be an assumption of being able to take up a slack within current provisions which does not actually exist (Great Waltham Parish Council)
- Need to account for changing requirements in respect of community sports facility needs (Sport England)
- Council's evidence base on community sports facilities (both indoor and outdoor) is out of date (Sport England)
- Policy is not robust enough to protect community facilities (Writtle Parish Council)
- Provision of natural green space is encouraged in new developments (Natural England)
- Co-ordinate with the Local Nature Reserves Strategy (LNRS) as it develops (Natural England)
- New greenspace should follow the guidance in Suitable Alternative Natural Greenspace (SANG) (Natural England).

#### Summary of General Consultees Comments:

- Support (Newland Spring Residents Association).

#### Summary of Developer/Landowner/Agent Comments:

- Support for the proposed approach (Gray & Sons, Grosvenor Property UK and Hammonds Estates LLP, Dandara, Chelmsford Garden Community Consortium, Bellway Strategic)
- Approach accords with the NPPF (Dandara, Bellway Strategic)
- Support for the current policies (Dominvs Group, Mr Alexander Micklem)
- Supportive of CCC's intention to work with infrastructure providers such as ECC and NHS (Cliffords Group Ltd, Miscoe Enterprises Ltd, Mr Alexander Micklem)
- Welcome that the Council will seek to include relevant site allocation policies for community uses such as crematoriums (Gray & Sons)
- Support the broad principles of the existing policies and their retention in the new Local Plan (Dominvs Group)



- Refresh policies to reflect the updated Use Classes Order (Mr Alexander Micklem)
- Priorities and policies should encourage facilities based on local need and engagement (Wates Developments Limited)
- Developers should be empowered to co-ordinate delivery of infrastructure on adjacent or/adjoining sites (Dominvs Group)
- Allocating larger sites can contribute towards the improvement of existing or delivery of new infrastructure through on site provision or financial contributions (Bellway Strategic)
- Important to ensure that existing facilities in rural villages are supported (Dandara)
- Recognise sports, leisure and recreation facilities as community facilities (Cliffords Group Ltd, David Lloyd Leisure and Aquila Development Ltd)
- Opportunity for uses of land for nature centres for schools and the community (Cliffords Group Ltd)
- Boreham Neighbourhood Plan identifies a need for accessible facilities (Wates Developments Limited).

#### Summary of Public Comments:

- The review provides an opportunity to add new locations as community assets
- New development must have adequate and timely services and facilities
- Need closer working with infrastructure providers to ensure new community facilities are provided before homes are occupied
- Any planned development needs to have all the support/funding in place and locked in before it starts
- CCC could top up funding for public services or lobby ECC or Government for change
- Development must have the facilities and infrastructure to be self-contained
- Provision for young people is inadequate
- Large scale developments have not provided facilities for young people
- Lost many of the community spaces used by young people and older people as the number of halls for hire at community level has been decimated
- No slack in public services, existing infrastructure or facilities
- If development is not self-contained transport and pollution problems continue
- Concern about pollution from new developments
- Foot and cycle mobility must be encouraged for environmental and health benefits
- Parking around schools during school run time is a constant problem and new facilities need to address this
- Construction of healthcare facilities are not the issue, it is providing the staff
- Housing developments seem to be looked at in isolation from the existing housing and ignoring any local community need for facilities
- A cycle path/footpath does not knit a new development into the existing
- Analysis is needed of how far residents have to travel to access services and other community assets
- Closure of centralised facilities to those out of town means residents no longer have access unless they have private vehicles.

### **Our evidence says**

National Policy - The NPPF continues to require LPAs to protect community facilities.

There is pressure on existing DIY livery yards across the Council's area for redevelopment to alternative uses.

The emerging Open Space, Sports and Recreational Facilities Study and Sports Facilities Strategy is assessing the need for community sports facility provision across the Council's area over the new plan period to 2041. It will help the Council ensure that the community has access to high quality facilities, helping communities to increase their levels of physical activity and improve their health and well-being. Any changes required to the review plan will be addressed at the Pre-Submission stage.

The Preferred Options IIA 2024 considers that policies to deliver and protect community assets would make a significant positive contribution to a number of the IIA objectives, including the economy, health and wellbeing, and urban renaissance, and help to ensure that there is sufficient provision of services and facilities to support growth and promote healthy lifestyles.

The EqIA conducted as part of the Preferred Options IIA 2024 records positive effects of policies relating to community services and infrastructure, accessible greenspace, and improved air quality on protected groups including the disabled, young and elderly people, and pregnant women.

### **The Preferred Options Local Plan**

Policy DM20 (Delivering Community Facilities) and DM21 (Protecting Community Facilities) are amended to ensure facilities are flexible in their use so that they are suitable for a variety of uses and groups of people.

Policy DM21 (Protecting Community Facilities) increases protection for livery yards, catteries, doggy day care facilities and pubs; due to the increasing number of applications for the change of use of livery yards and pubs, and to reflect the increasing importance of catteries and doggy day care facilities post the Covid-19 pandemic.

The proposed site allocation policies and Strategic Policy S9 (Infrastructure Requirements) will ensure that new development is supported by necessary infrastructure and services including primary schools, green space, health provision.

New and improved infrastructure, services and facilities proposed in the Preferred Options Local Plan has been informed by discussions with service and infrastructure providers (including Essex County Council, National Highways and Anglian Water).

The design of, and access arrangements for, new schools will be considered at the more detailed masterplan/planning application stage in consultation with the Education Authority and Local Highways Authority.

Other policies in the Preferred Options Local Plan address issues such as minimising pollution (DM30 – Contamination and Pollution).

## Design

Key statistics:

<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
<b>43. Do you support the approach being taken? If you disagree, please explain why?</b>	28	5	26	59
<b>44. Do you have any views on the Council's current design policies and the decisions they lead to?</b>	N/A	N/A	20	20
<b>45. What would you consider to be 'beautiful' in terms of development?</b>	N/A	N/A	26	26
<b>46. Do you have any views on the proposed ideas for new policies or significant changes?</b>	N/A	N/A	35	35
<b>47. Have we missed anything? Where possible, please support your answer with reference to any evidence.</b>	N/A	N/A	16	16

Summary of Specific and DTC consultees comments:

- Support the proposed approach (Great Waltham Parish Council, Essex County Council)
- The proposed approach would address design issues connected with healthy lifestyles (Broomfield Parish Council)
- Approach does not take account of more obvious issues about architecture and design for example around the historic environment and how new development can integrate this successfully (Broomfield Parish Council)
- Support the reference made to the EDG in respect of new design policies (South Woodham Ferrers Town Council)
- Missed a reference to Village Design Statements as these can have a good input for local design codes (Broomfield Parish Council)
- The current policy needs to be more joined up with the net zero target of 2050 (South Woodham Ferrers Town Council)
- The current policy works best in master planned areas and is less successful in single or smaller developments (Broomfield Parish Council)
- Decision making should be more heavily informed by local residents (Great Waltham Parish Council)
- Any new design policies should not impact on the natural environment (South Woodham Ferrers Town Council)
- Beautiful is subjective and a wide range of policies are needed (Writtle Parish Council, Great Waltham Parish Council, Broomfield Parish Council)

- Beauty should reflect the democratic views of the local community (Broomfield Parish Council)
- Professionals should design developments with influences around the traditional views of beauty (Broomfield Parish Council)
- Beautiful is development which is not different in style or design to the existing (Great Waltham Parish Council)
- Beauty is about developments which amongst other matters fit in with the local architecture, landscape, has adequate open space, is safe and attractive and have sufficient provision for sustainable waste management (Broomfield Parish Council)
- Electricity pylons being visible in the landscape would not be beautiful (Great Waltham Parish Council)
- A beautiful place can be secured through the development of masterplans, design guides or codes, area-based character assessments, The Building Better, Building Beautiful Commission's report 'Living with Beauty' and the National Design Guide and National Model Design Code (Essex County Council)
- The South Woodham Ferrers Neighbourhood Plan sets out clear design principles which amongst other matters includes eco-friendly design as very important (South Woodham Ferrers Town Council)
- Support any new policies that highlight the need for Health Impact Assessments on large housing sites and bring the Livewell Accreditation into policy (Mid and South Essex Integrated Care Board (ICB), Sport England, Essex County Council)
- Health Impact Assessments should use the latest guidance from Essex County Council and Sport England (Sport England)
- Livewell Accreditation only encourages developers and appears weak. Should developers not need to provide evidence of how it has been considered and achieved (Great Waltham Parish Council)
- A flexible, site-specific approach should be followed for any housing density standards (Essex County Council)
- A minimum density standard should be introduced in certain locations where it is considered appropriate (Essex County Council)
- Reference should be made to the EDG on higher density development, which provides detailed guidance on a wide range of density matters (Essex County Council)
- Green Infrastructure (GI) provision and Integrated Water Management (IWM) is central to creating a framework for well designed, sustainable, and attractive places, and promoting the health and social wellbeing of communities (Anglian Water Services Ltd, Essex County Council)
- Welcome design guidance and design codes on relevant site allocations which sets out how the development would be made accessible and inclusive for all regardless of disability or impairment as well as the consideration of dementia friendly principles and autism friendly communities in the development of public and community spaces (Essex County Council)
- Welcome new policies that make explicit reference to planning and designing new developments with regard to the needs of the health and well-being of the whole population including older people and people with disabilities (Essex County Council)

- Within denser developments, green infrastructure and open space should be approached from a multifunctional perspective, combining uses such as sustainable drainage, public open space, walking and cycling routes and biodiversity conservation to combine functional uses with amenity benefits (Essex County Council)
- Support the use of Design Codes which imbed GI and IWM to help deliver sustainable development (Anglian Water Services Ltd)
- Support the creation of design codes and suggest that reference be made to the Essex Design Guide (EDG) and other ECC documents (Essex County Council)
- Greater emphasis should be placed on local design codes. How are they agreed and how can the local community and Parish Council get involved and be resourced and skilled to lead this process? (Broomfield Parish Council)
- The use of design policies and codes reflect the latest thinking and best practice in terms of delivering 'net zero' development (Essex County Council)
- Garages are not well used and too small for modern cars. Removing garages could create more space for on-plot parking or other more useful spaces for future residents (South Woodham Ferrers Town Council)
- Should be recognition of the central spine of South Woodham Ferrers as the High Street. This would help the expansion of the existing retail offer (South Woodham Ferrers Town Council)
- Greater emphasis on shared power locally in any new or amended policies (South Woodham Ferrers Town Council)
- Give greater recognition to the East of England Ambulance Service NHS Trust in promoting the health and social wellbeing of communities, as it fulfils a clear 'community cohesive and safety focused role'. This is through community first responders, the provision of life saving equipment such as defibrillators, and other 'first response' medical resources located in a community buildings and other locations (East of England Ambulance Service NHS Trust)
- The National Design Guide 2019 and EDG make specific reference to planning and designing new developments with regard to the needs of the ageing population. This can be achieved by ensuring homes and communities are flexibly designed and can adapt to user needs; providing options for self-care and self-support through digital connectivity; and supporting general health and wellbeing through the delivery of high-quality, considered design (Essex County Council)
- It is important that the new Local Plan recognises that good design goes beyond simply visual considerations. The Plan should require development proposals to make reference to the sustainable planning of building materials as well as the management of waste arising during construction (Essex County Council)
- Should include reference to the Essex Minerals Local Plan (Essex County Council)
- For new developments, whole life carbon assessments should be carried out and measures taken to reduce embodied carbon emissions targeting best practice (Essex County Council).

Summary of General Consultees Comments:

- Supportive of the proposed policies (CHP, L&Q)
- Beautiful is ensuring all people have access to the services and facilities they need (CHP)
- Beauty is development which has enough parking which is not on-street, and well-lit accessible dwellings with outdoor space including outdoor spaces interspersed with housing and community buildings, outdoor spaces with sympathetic planting that encourages wildlife and biodiversity and, elevated green space such as hedges and street trees (CHP)
- Concerned about all the proposed extra on site requirements proposed and the impact that will have on the site capacity/viability (CHP)
- Support a more design led approach to determining acceptable density levels (L&Q)
- Suggest that any proposed density guidance is expressed as a minimum figure to protect against the inefficient development of land. The policy should make clear that the appropriate density for each scheme will differ subject to various design factors including character, setting, layout, typology, landscape and open spaces (L&Q)
- CCC should carry out extensive engagement with stakeholders including developers and city residents in regard to the creation of design codes (L&Q).

#### Summary of Developer/Landowner/Agent Comments:

- Support the proposed approach which includes introduction of design codes (Bellway Homes Ltd, Obsidian Strategic Asset Management Ltd, Bellway Strategic, Taylor Wimpey, Persimmon Homes, Grosvenor Property UK and Hammonds Estates LLP, Gladman Developments Ltd)
- Proposed approach would be in line with national policy and guidance including the National Design Guide and National Model Design Guide (Bellway Homes Ltd, Bellway Strategic, Persimmon Homes, Mr Alexander Micklem, Gladman Developments Ltd)
- Support the current policy (Dominvs Group, Taylor Wimpey, Rosehart Properties Ltd, Pembridge Land Group, Persimmon Homes)
- Support the current policy as it is consistent with other good practice guides including the policy on Tall Buildings (Dominvs Group)
- Current policy will need updating in accordance with latest national policy and guidance (Rosehart Properties Ltd, Pembridge Land Group)
- Current wording is imprecise and views on architectural quality vary (Persimmon Homes)
- Question whether public art is required on all major development sites (Persimmon Homes)
- Express a commitment to the creation of beautiful, healthy, sustainable, distinctive and safe places and their essential role in high quality design (Obsidian Strategic Asset Management Ltd, Dandara Eastern, Taylor Wimpey, Dandara, Hill Residential Ltd, Persimmon Homes, Graham Dines, Gladman Developments Ltd)
- Support the proposed introduction of housing density standards (A.G. & P.W.H Speakman, The Bucknell Family, Mr Alexander Micklem, Bolton, S&D, Bellway Strategic, Chris Buckenham, Cliffords Group and Mr Mark Peters)
- The housing density standards could look at increasing housing densities around transport nodes (Countryside Partnerships)

- Housing density standards could be contained within a design code (Wates Developments Limited)
- Housing density standards should be created for different site locations across the local authority's area (Bellway Strategic)
- Housing density standards should be guidance and not policy (Countryside Partnerships)
- Not supportive of the proposed housing density standards as these should be on a site-specific basis (Dominvs Group, Wates Developments Limited)
- Housing density standards could slow down the planning process unnecessary, harm viability and the deliverability of sites (Wates Developments Limited)
- Not appropriate to set housing density standards as a blanket policy across all major sites as each site context is different (Gleeson Land)
- A number of stakeholders and disciplines should be involved in the process to shape future development (Gladman Developments Ltd)
- Support the introduction of design codes (Grosvenor Property UK and Hammonds Estates LLP, A.G. & P.W.H Speakman, The Bucknell Family, Mr Alexander Micklem, Bolton, S&D, Taylor Wimpey, Persimmon Homes, Dandara, Chris Buckenham, Cliffords Group and Mr Mark Peters)
- National design guides provide advice on how to achieve good design (Pembridge Land Group, Rosehart Properties Ltd, Persimmon Homes)
- Design codes should provide guidance on sites which are not of strategic scale (Hill Residential Ltd, Dandara Eastern, Graham Dines, Dandara)
- Do not support the introduction of design codes on major sites and no definition of major is provided in the I&O consultation document (Bellway Homes Ltd, Bellway Strategic, Gleeson Land)
- Design codes are only appropriate on strategic major sites where there are multiple developers (Gleeson Land)
- Requirement for a design code should be in site specific/allocation policies (Bellway Homes Ltd, Bellway Strategic)
- Separate design codes should be created for each settlement/local area (Persimmon Homes, Pembridge Land Group, Rosehart Properties Ltd)
- Planning policy should place great emphasis on outstanding or innovative design (Dominvs Group)
- There is no policy commitment to ensuring participatory design and planning throughout the development process for the strategic allocated sites (Grosvenor Property UK and Hammonds Estates LLP)
- Appendix B is not needed as some developers prefer to use the EDG which is more regularly updated and referred to in the Local Plan. EDG and Appendix B not always compatible. Either Appendix B should be more aligned with EDG or removed (Persimmon Homes)
- Concern about policy which aspires to achieve 'beautiful' development and that in aspiring 'beautiful' this is not disproportionately prioritised (Bellway Homes Ltd, Mr Alexander Micklem)
- Beautiful is subjective (Pembridge Land Group, Rosehart Properties Ltd, Bellway Strategic, Bellway Homes Ltd, Persimmon Homes)
- Should avoid the approach and use of the EDG as this produces ubiquitous design which is not beautiful (Pembridge Land Group)

- Use of the term 'beautiful' is resisted as it is ambiguous. Does not comply with the NPPF which requires Local Plans to be clearly written and unambiguous (Bellway Strategic, Bellway Homes Ltd)
- Local Plan should avoid defining beautiful as it stifles innovation and unique design (Dominvs Group)
- Beautiful development is compatible with its local surroundings and one where there has been engagement with the local community (Persimmon Homes)
- Beautiful is development which is defined by people who and live in the local area in line with the Government's 'Building Better, Building Beautiful' Commission which recommended that public engagement be 'wide, deep and early' (Living with Beauty, 2020) (Grosvenor Property UK and Hammonds Estates LLP)
- Support to bring Livewell Accreditation in as a policy requirement (Grosvenor Property UK and Hammonds Estates LLP, Dominvs Group, Wates Developments Limited, Chris Buckenham, Cliffords Group, Mr Mark Peters)
- Concern that some of the new policies could hinder development (A.G. & P.W.H Speakman, The Bucknell Family, Bellway Homes Ltd, Mr Alexander Micklem, Bolton, S&D, Bellway Strategic, Chris Buckenham, Cliffords Group and Mr Mark Peters)
- Flexibility and collaboration are needed particularly between stakeholders (A.G. & P.W.H Speakman, The Bucknell Family, Mr Alexander Micklem, Bolton, S&D, Chris Buckenham, Cliffords Group and Mr Mark Peters)
- Critical that the employment strategy reflects and responds to emerging and rapidly changing trends in various key sectors by delivering a flexible supply of employment land across the local authority's area throughout the plan period (Pigeon (Sandon) Ltd)
- Need for housing growth and economic needs to be considered and reviewed jointly (Pigeon (Sandon) Ltd).

#### Summary of Public Comments:

- Better design is required
- Developments physically separated from existing settlements cannot become integrated
- Needs a plan to mitigate impact on local ecology
- The planting of trees would not make up for the destruction of local habitats
- The current policies have led to some examples of good design
- The wording used in the proposed policies is too vague
- There are too many large houses on small plots or blocks of apartments
- Private outdoor amenity space is essential
- Sustainable development is important
- Support the introduction of housing density standards and design codes
- Safe design is paramount
- Housing densities should increase to encourage new commercial and leisure development
- There should be a maximum housing density standard
- Design standards in some recent developments has led to congestion, lack of personal space and gardens, and all developments looking the same



- On-shore wind turbines should be considered to power new development
- Attractiveness is subjective and does not always equal good design
- Beautiful development doesn't exist
- Beauty includes screening
- Beautiful means development which is in line with local building materials, design and scale and the local vernacular
- Beautiful is well-designed, meets the needs of its occupiers, is a variety of structures and finishes, means few or no cars, is redeveloping brownfield sites and is about creation of a shared community
- Symmetry is beautiful
- Beautiful is green with trees, gardens and communal green spaces, and communal ponds
- Beautiful is development with native trees, hedgerows and biodiverse gardens
- Beautiful is having your own driveway, access to travel services which are affordable and reliable, a variety of affordable homes and houses using modern technologies such as solar panels and heat pumps
- Need to identify locations for public realm enhancement
- Developers should be made accountable to provide safe, affordable, desirable developments that promote and safeguard people's physical and mental well-being
- Healthy places can only be achieved if they are located in large urban areas providing the facilities within walking/cycling distances, thus encouraging a healthier lifestyle and reducing pollution and the carbon footprint
- Support Health Impact Assessments but these should be used on applications of most relevance.
- The consultation misses the need to achieve integrated communities.

<b>Our evidence says</b>
National Model Design Guide and Code 2022 – these set out the characteristics of well-designed places and demonstrate what good design and beautiful places means in practice. Regard should be had to the Guide and the Code, which will be used to inform an update of the Making Places SPD.
Essex Part 1 Parking Guidance 2023 – sets out revised requirements for parking provision and electric vehicle charging infrastructure.
Report 2: Essex Net Zero Policy, and the Essex Design Guide 2023, set out design guidance and advice which underpins Policy DM31 (Net Zero Carbon Development (In operation)).
Historic England Advice Note 4 2022: Tall Buildings contains updated content which includes the need for high quality architecture and consideration of the viewpath.
The Preferred Options IIA 2024 considers that policies aimed at delivering high quality places would make a significant positive contribution to a number of the IIA objectives, including housing, health and wellbeing, climate change, landscape and townscape, and urban renaissance, including the requirement for net zero carbon development.

## The Preferred Options Local Plan

Policy DM23 (High Quality and Inclusive Design), DM26 (Design Specification for Dwellings), DM27 (Parking Standards), and DM30 (Contamination and Pollution) are largely unchanged as they remain consistent with national policy and guidance. Reference has been added to design guidance contained in Neighbourhood Development Plans.

Policy DM24 (Design and Place Shaping Principles in Major Developments) has been expanded to include the requirement for developers to have regard to the National Model Design Guide and National Model Design Code. A link has also been included to tree planting advice; the requirement for development at a certain threshold to submit a Health Impact Assessment; and links to design resources for enhancing safety for girls and women in new development. Reference has been added to design guidance contained in Neighbourhood Development Plans.

Policy DM25 (Sustainable Buildings) includes updated requirements for water efficiency and rainwater harvesting, and access to electric vehicle charging infrastructure. Content relating to zero carbon development has been merged into Policy DM31 (Net Zero Carbon Development (In operation)).

Policy DM31 (Net Zero Carbon Development (In operation)) is a new policy developed with Essex Planning Officers Association and Essex County Council, for new buildings to be designed and built to be net zero carbon in operation.

Policy DM28 (Tall Buildings) has been updated to reflect the advice note published by Historic England.

Health and social wellbeing of communities, including design considerations, is now covered by the new Strategic Policy S14 (Health and Wellbeing).

The Making Places SPD will be reviewed, and any appropriate changes/additions included.

The Preferred Options Local Plan does not propose the use of minimum density standards. Policy DM23 (High Quality and Inclusive Design) recognises that good design relates to a consideration of the character and context of the area rather than imposing arbitrary density requirements. The use of 'around' housing figures allows for an appropriate degree of flexibility in provision and for higher density development to be brought forward where this conforms with other policies in the Plan as a whole. Strategic Policy 1 also supports the use of higher densities where appropriate on previously developed sites, particularly near public transport interchanges on previously developed sites and as reflected in site policy SGS1e (Civic Centre Land).

## 8 Delivering new and improved infrastructure to support growth

### Infrastructure

Key statistics:

Question	Yes	No	Comments	Total number of responses
<b>48. Do you support the approach to be taken? If you disagree, please explain why?</b>	31	6	34	71

<b>49. Do you have any views on the Council's current infrastructure policies and the decisions they lead to?</b>	N/A	N/A	23	23
<b>50. Have we missed anything? Where possible, please support your answer with reference to any evidence.</b>	N/A	N/A	20	20

Summary of Specific and DTC consultees comments:

- Once there is more certainty on future growth locations Anglian Water will be able to plan investment to support that growth. This is likely to be in the plans for Asset Management Period 9 (AMP9) 2030-2035 (Anglian Water Services Ltd)
- Welcome the proposed approach and will provide necessary information to support the Council reviewing its Infrastructure Delivery Plan (IDP) and infrastructure required to support sites in a viable and sustainable manner (Anglian Water Services Ltd, Essex County Council, Mid and South Essex Integrated Care Board)
- Welcome reference for continuing to prepare site specific planning documents and adopt a master planning approach for major developments/growth areas with the emphasis on implementation and delivery to ensure the necessary infrastructure requirements, design codes, funding, phasing and delivery are fully addressed (Essex County Council)
- It is important to note that existing primary schools in the urban area have limited space to expand to accommodate any increase in demand (Essex County Council)
- In considering where new development should be located consideration should be given to both spare educational capacity and where existing education capacity has limited or no additional capacity (Essex County Council)
- Infrastructure in the current Plan was based on the 'around' site numbers and policies do not factor in any uplift on these regarding infrastructure requirements (South Woodham Town Council)
- Developments or potential site allocations that are unsustainable in school transport terms should be resisted (Essex County Council)
- Need for continued cross-boundary engagement should the growth strategy selected create infrastructure demands beyond Chelmsford's administrative boundary including the A12 transport corridors between Chelmsford and the M25, and onward impacts onto the A127 (Brentwood Borough Council, Rochford District Council)
- Connectivity needs to go beyond the development site for transport (active and sustainable), secondary schools, health and well-being, social and cultural and sewage disposal (South Woodham Town Council)
- More CIL money should be used for local infrastructure so there is a proper link between where the money is generated and where it is used. Developments outside Chelmsford should not be contributing to the infrastructure of the Chelmsford City area (South Woodham Town Council)

- Support strengthening health and wellbeing measures and facilities, placing stronger emphasis on improving sustainable and active travel infrastructure and opportunities (Mid and South Essex Integrated Care Board, Sport England)
- Identifying Strategic Priorities for community sports infrastructure will be particularly important in view of the widening range of competing infrastructure that CIL and planning obligations are expected to fund, the viability constraints of new development and limited external funding (Sport England)
- Would like to be involved with agreeing the scope and content of the IDP and Viability Study. Without involvement the Town Council will disagree with the approach taken as not being representative nor fair (South Woodham Ferrers Town Council)
- No issue with the approach and requirements for infrastructure but concern over the time items take to be delivered (Great Waltham Parish Council)
- Need to ensure agendas of all stakeholders are clearly aligned and infrastructure items can be delivered before sites are allocated (Broomfield Parish Council)
- Review should seek to 'maximise' the amount of on site infrastructure and contributions on new development, not simply 'ensure' infrastructure is provided subject to viability (Essex County Council)
- Need to refer to wider administration area and not just focus on 'city centre infrastructure' as currently drafted in this section (Rochford District Council, South Woodham Town Council)
- The section understates the value of new garden communities and their ability to deliver infrastructure, unlike the difficulties faced when trying to expand existing facilities (Broomfield Parish Council)
- ECC presently has no formal role in the CIL governance process. This has led to some difficulties in securing monies for infrastructure projects that ECC is required to deliver with any degree of certainty or when they may be required (Essex County Council)
- Policy S9 should be revised to support future proofing digital connectivity and high-quality mobile coverage for all homes and businesses. The policy refers to superfast broadband, but not fixed line gigabit-cable broadband and/or 5G connectivity (Essex County Council)
- A commitment to deliver infrastructure is missing from this section (South Woodham Town Council)
- More openness is needed to be able to prove to the public what can be achieved (Writtle Parish Council)
- Widen the Plan's treatment of the term 'infrastructure' to also make reference to medical facilities (East of England Ambulance Service NHS Trust)
- Request a definition of 'ambulance facilities' is included either within the Local Plan or IDP to guide developers and decision makers (East of England Ambulance Service NHS Trust).

#### Summary of General Consultees Comments:

- Support a viability study being undertaken (CHP)
- New station at Beaulieu will open up new opportunities to locate sustainable development close to this important hub (North West Parishes Group)

- There needs to be a greater commitment to achieving safe cycle routes across the district (North West Parishes Group)
- The section understates the value of new garden communities and their ability to deliver infrastructure, unlike the difficulties faced when trying to expand existing facilities (North West Parishes Group).

#### Summary of Developer/Landowner/Agent Comments:

- Support the need to deliver the appropriate and timely infrastructure to support sites (Taylor Wimpey, Dandara, Obsidian Strategic Asset Management Ltd, Dandara Eastern, Grosvenor Property UK and Hammonds Estates LLP, Bellway Strategic, Hill Residential Ltd)
- Support the review of the IDP and further transport studies being undertaken (Chelmsford Garden Community Consortium)
- Any future infrastructure requirements need to be viability tested to ensure they can be delivered (Taylor Wimpey, Gleeson Land, Dandara, Dominvs Group, Dandara Eastern, Bellway Strategic, Hill Residential Ltd, Greystoke CB)
- Policies and requirements need to allow for flexibility to take account of any changes, as the Government is currently considering different options to the current CIL and S106 (Dandara, Dandara Eastern, Hill Residential Ltd)
- The aims and aspirations of the Council's Waterways Working Group should be reflected in the policies, particularly regarding infrastructure provision (Vistry Group)
- Support a review of important social infrastructure to promote mental health and wellbeing (Cliffords Group Ltd, David Lloyd Leisure and Aquila Development Ltd)
- Support a review to securing BNG and strengthening health and wellbeing measures (Cliffords Group Ltd)
- Sites which can enable the creation of new active travel corridors should be actively supported (Obsidian Strategic Asset Management Ltd)
- Support the need for community led infrastructure to respond to identified need amongst new and existing communities (Gray & Sons, Grosvenor Property UK and Hammonds Estates LLP, Miscoe Enterprises Ltd)
- Developments in rural villages and the Green Belt can also help increase the viability and the vitality of existing services and facilities and make provision for future facilities in the form of CIL payments and any site-specific infrastructure requirements (Dandara, Hill Residential Ltd, Graham Dines)
- Likely changes in Government planning legislation and policy may require fundamental changes to CIL (Pembroke Land Group, Rosehart Properties Ltd).

#### Summary of Public Comments:

- No development should be allowed to take place until the necessary infrastructure is in place
- Needs to be more concise about what will actually be done to support developments
- Delivery of necessary infrastructure should not be compromised at the expense of developer profit

- More needs to be done to reduce traffic from developments
- Consideration of the necessary infrastructure needs should be done much earlier in the process
- The Council has limited ability to influence provision/improvement of infrastructure such as hospitals, medical centres or the A12
- Paragraph 5.97 only considers Chelmsford and not, other Towns and Villages
- Need to take account of infrastructure required to address flood risk
- Consider trams, monorails or new branch lines to connect keys settlements with Chelmsford.

### **Our evidence says**

In accordance with national policy and guidance infrastructure required to be delivered by a site must be generated by needs arising from the site. The Infrastructure Delivery Plan (IDP) 2023 sets out a high-level baseline of assumptions regarding infrastructure required to support the Preferred Options Local Plan proposed site allocations. The IDP will be reviewed and updated as the Plan progresses and covers the whole Plan area.

The Local Plan Viability Report (2023) provides a high-level viability of different typologies of development sites that could come forward through the new Local Plan allocations. The assessment supports the site allocations in the preferred Spatial Strategy, which can be achieved in combination with all policy requirements (including infrastructure requirements).

The Preferred Options IIA 2024 considers that policies to secure infrastructure would make a significant positive contribution to a number of the IIA objectives, including the transport, water and flood risk, including positive effects on water resources and quality, and mitigating flood risk.

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The Preferred Options Spatial Strategy has been informed by infrastructure providers, such as Anglian Water Services Ltd, Essex County Council, Mid and South Essex Integrated Care Board, and the Council will continue to work with providers to ensure the necessary infrastructure required is identified in the Infrastructure Delivery Plan (IDP).

Further information on the approach to the Spatial Strategy and site selection is set out in the Preferred Options Spatial Strategy and Strategic Sites Topic Paper.

Master planning for strategic site allocations continues to be a policy requirement for relevant sites.

All infrastructure requirements in the Preferred Options Local Plan are based on current known housing numbers in the April 2023 Housing Site Schedule.

In accordance with national policy and guidance infrastructure required to be delivered by a site must be generated by needs arising from the site.

Strategic Policy S9 (Infrastructure Requirements) has been updated to reflect current infrastructure needs for the Preferred Options Local Plan. This includes the need for gigabit broadband, emergency services infrastructure, health and wellbeing facilities and measures, and flood mitigation measures, along with many other types of infrastructure provision.

The delivery of infrastructure will continue to be through a combination of on and off-site provision, through the combination of planning conditions and/or planning obligation and/or financial contributions through the Community Infrastructure Levy

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or its successor, in accordance with Strategic Policy S10 (Delivering Infrastructure) and site policy allocations and their relevant requirements.

Strategic Policies S4 (Conserving and Enhancing the Natural Environment) and S17 (Future of Chelmsford City Centre), and relevant site policies include the need for development to take into account the Council's [Plan for Improving Rivers and Waterways](#) 2022 (Item 7 on Agenda available via the link), which sets out opportunities to improve these assets.

### 9 Encouraging resilience in retail, leisure, commercial and cultural development

#### Retail and Designated Centres

Key statistics:

Question	Yes	No	Comments	Total number of responses
<b>51. Do you support the approach to be taken? If you disagree, please explain why?</b>	21	1	7	29
<b>52. Do you have any views on the Council's current retail policies and the decisions they lead to?</b>	N/A	N/A	15	15
<b>53. Have we missed anything? Where possible, please support your answer with reference to any evidence.</b>	N/A	N/A	12	12

Summary of Specific and DTC consultees comments:

- Support for the proposed approach (Essex County Council, Braintree District Council, Great Waltham Parish Council, Writtle Parish Council, Broomfield Parish Council)
- Consider the implications of significant flexibilities provided through the revised Use Class E and the permitted change use between Commercial, Business and Service (Class E) to residential (C3). Issues to consider include the potential reduction in design quality and potential for mitigation measures given the decrease in developer contributions. It is unclear how town centres and high streets will be plan-led as the permitted development rights undermine the ability of Local Plan policies to manage the development of places appropriately (Essex County Council)
- CCC's retail policies generally seem to have had a positive impact on South Woodham Ferrers Town Centre with new local shops and businesses opening in the past five years. CCC's retail policies need to recognise local partnerships such as the 'business forum'. Would also like to see a 'place

branding' strategy introduced for South Woodham Ferrers (South Woodham Ferrers Town Council)

- Visiting city/town centres has to be made attractive, and this is likely to be less so if a primary focus on retail is maintained (Great Waltham Parish Council)
- Current retail policies are not flexible enough to reflect current and future trends. At present the future function and use of centres is very volatile. A greater range of sustainable solutions should be available to offset potential conventional retail challenges. Vitality should be encouraged at almost all costs to prevent potential central urban decay (Writtle Parish Council).

#### Summary of General Consultees Comments:

- General support for the proposed approach (Newlands Springs Residents Association).

#### Summary of Developer/Landowner/Agent Comments:

- General support for the proposed approach (Rosehart Properties Ltd, Pembridge Land Group, Dominvs Group, Bellway Strategic, Mr & Mrs Andrew Parker, Taylor Wimpey)
- Conventional retail has been subject to substantial structural change with many goods available conveniently and cost effectively on-line having a noticeable impact on high streets and city centres. Maintaining a vibrant city requires a wide range of uses, including residential which will enhance footfall benefitting local shops and services (Dominvs Group)
- Whilst siting of new residential development can assist in ensuring the continued vitality and viability of centres, allowing settlements to expand through new development outside of the existing settlement boundary can allow the population of settlements to grow. This will increase footfall to existing shops and services especially where there is good pedestrian connectivity to the town centre (Bellway Strategic)
- Major changes in retail shopping patterns and activity, together with changes to the Use Classes Order necessitate a significant review and updating of current retail policies. The current economic downturn and rising inflation will also influence current trends (Rosehart Properties Ltd, Pembridge Land Group)
- Existing retail policies recognise the primacy of Chelmsford City Centre in retail terms and this is welcome (Aquila Developments Ltd)
- Policy DM5 is predicated on managing the proportions of A1, A2 and A3 uses in key frontages, and now redundant with the introduction of Class E (Dominvis Group)
- The city centre focus needs to be retained via a clearly defined Primary Shopping Area irrespective of the changes introduced by the Use Classes Order. Frontage classification within this wider definition is of lesser significance (Aquila Developments Ltd).



## Summary of Public Comments:

- Why do policies (5.107) apply to Chelmsford City but not the rest of the Chelmsford area? Disagree because the approach is not being enforced
- A mixture of uses in town centres makes them more interesting. Focussing solely on retail is unrealistic with the popularity of online shopping
- Consider increased leisure uses in town centres where the demand for shopping is reduced
- There is scope for high rise residential development in urban centres, especially Chelmsford to provide accommodation particularly for single people and students. This would also help CCC achieve its residential development targets
- South Woodham Ferrer's retail space needs to be improved. The layout and flow of the town is enclosed, unappealing and limits foot traffic. The properties and paving are in a bad state of repair and disconnected from green spaces.

<b>Our evidence says</b>
The Retail Capacity Study Update 2023 finds that there is no need to allocate new sites for retailing in the review plan and that there are no significant gaps in the provision of larger commercial leisure facilities.
National Policy - The requirement to designate primary and secondary retail frontages has been removed from the NPPF.
The Retail Capacity Study Update 2023 recommends changes to the boundaries of Chelmsford City Centre to focus on the area of the city centre's main function as a retail and leisure destination.
The Retail Capacity Study Update 2023 recommends that the boundary of Beaulieu Principal Neighbourhood Centre is changed to better reflect the centre's provision of shops and services.
The Retail Capacity Study Update 2023 recommends that a Primary Shopping Area is defined for The Vineyards Principal Neighbourhood Centre to protect the core area of this centre for town centre use purposes.
A significant reform of the Use Class Order was announced in July 2020 with effect from September 2020. A new use class, a broad Use Class E (Commercial, Business and Service) was formed merging the former Use Classes labelled A1, A2, A3, B1, B2, D1 and D2.
The Chelmsford Retail Capacity Study 2023 recommends that a 500sqm gross threshold for impact assessments should apply to leisure as well as retail proposals (for retail proposals outside of designated primary shopping areas and for leisure proposals outside of town centre boundaries).
The Chelmsford Retail Capacity Study 2023 supports the amalgamation or subdivision of existing uses to encourage investment; 'meanwhile' uses to temporarily occupy long-term vacant units where they support the vitality and viability of the town centre, and complementary initiatives such as click and collect hubs and outdoor space for public events.

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No floorspace for additional new convenience or comparison shopping is proposed in the Preferred Options Local Plan in line with the Chelmsford Retail Capacity Study 2023.

National Policy - Primary and secondary retail frontages have been removed from Strategic Policy S12 (Role of City, Town and Neighbourhood Centres) and DM5 (Designated Centres) to reflect updates to the NPPF.

Strategic Policy S12 (Role of City, Town and Neighbourhood Centres) and DM5 (Designated Centres) are changed to reflect changes to the Use Classes Order, downturn in economy, changing retail shopping habitats and to provide greater flexibility for a mix of uses.

A new Strategic Policy S17 (Future of Chelmsford City Centre) is added to the Preferred Options Local Plan. This policy seeks to improve the City's cultural offer, achieve increased footfall, activity and vibrancy.

In line with Chelmsford Retail Capacity Study 2023, the boundaries of Chelmsford City Centre and Beaulieu Principal Neighbourhood Centre are reduced, a new Primary Shopping Area is proposed at The Vineyards Principal Neighbourhood Centre, and no amendments are proposed to Chelmsford and South Woodham Ferrers Primary Shopping Areas or to South Woodham Ferrers Town Centre.

Some matters raised in the representations are too detailed for a Local Plan such as 'place branding' of South Woodham Ferrers Town Centre.

### Encouraging resilience in leisure, commercial and cultural development

Key statistics:

Question	Yes	No	Comments	Total number of responses
<b>54. Do you support the approach to be taken? If you disagree, please explain why?</b>	19	3	14	36
<b>55. Do you have any views on the Council's current leisure, commercial and cultural policies and the decisions they lead to?</b>	N/A	N/A	13	13
<b>56. Have we missed anything? Where possible, please support your answer with reference to any evidence.</b>	N/A	N/A	15	15

Summary of Specific and DTC consultees comments:

- General support for the proposed approach (Sport England, South Woodham Ferrers Town Council, Great Waltham Parish Council, Writtle Parish Council)
- Up-to-date and robust evidence base on community sports facilities is required to support the updated policies as the existing evidence base is out-of-date (Sport England)

- South Woodham Ferrers has a good leisure centre including a swimming pool and Marsh Farm but no cultural facilities (such as cinemas and art galleries). Cultural assets are focused in Chelmsford. Any approach to leisure should recognise this shortcoming (South Woodham Ferrers Town Council)
- There should be a commitment from CCC to work with Town Council and ECC to improve the outdoor cultural offer such as commissioning of sculptures to place within the green necklace which reflect historic and environmental aspects of our town. South Woodham Ferrers should also be more fully integrated into CCC's cultural offering so that our residents can have access to outdoor performances without having to travel to Chelmsford e.g. the 3 foot festival. The Town Council are looking into setting up a museum/cultural centre in South Woodham Ferrers, so that artifacts and records of the town can be available for residents and visitors (South Woodham Ferrers Town Council)
- Larger new-build developments should be concentrated in existing built-up areas, and this should follow through into many aspects of the provision of leisure, commercial and cultural facilities (Great Waltham Parish Council)
- Local evidence is needed to properly and accurately assess growth needs of individual settlements (Writtle Parish Council).

#### Summary of General Consultees Comments:

- General support for the proposed approach (Newlands Spring Residents Association, Theatres Trust, Chelmer Housing Partnership)
- The existing Local Plan has strong policies on the promotion and protection of valued community and cultural facilities. We would wish to see these retained (The Theatres Trust)
- Object to multiple aspects of this plan and consultation. Development should be infrastructure led, rather than just meeting targets. Roads, schools, GP practices and bus routes need to connect and join our communities. The Government's baseline for affordable housing is not truly affordable, what percentage will be social housing including shared ownership and rent, 35% is recommended. A mixture of three and two bed housing is needed, not luxury five bedrooms houses. Have the figures for housing development been peer reviewed by development experts? (Chelmsford Labour Party)
- Include something to reflect the ongoing opportunities for residents to help shape the local communities that are developing. For example, your policy on hearing the resident's voice in the developments of place. It should connect to CCC participation policies or strategies. Communities are made by people not just infrastructure and the ambition could be stronger in this area (Chelmer Housing Partnership).

#### Summary of Developer/Landowner/Agent Comments:

- General support for the proposed approach (Taylor Wimpey, Rosehart Properties Ltd, Mr & Mrs Andrew Parker, Pembridge Land Group, Dominvs Group, Grosvenor Property UK and Hammonds Estates LLP, Cliffords Group Ltd)
- Adopted Local Plan policy directs community facilities to areas well served by public transport which is supported (Dominvs)

- Existing policies have led to delivery of enhanced leisure, commercial and cultural facilities in the city, but the economic downturn and recession may act as a constraint to delivery of future schemes. It is important that the major growth sites provide sufficient and a balanced range of such facilities (Rosehart Properties Ltd, Pembridge Land Group)
- The output from the updated retail and leisure needs study is awaited but we believe that previous studies have already indicated that adequate provision is required for indoor commercial sport & leisure. Policy initiatives have been largely directed to public facilities which will not fully meet this need. Urban growth to the north of Chelmsford should be an important factor in securing additional provision across a range of leisure types (Aquila Developments Ltd)
- Leisure, commercial and cultural related priorities and policies should encourage developments to facilitate such facilities based on local need and engagement with local communities (Wates Developments Ltd).

Summary of Public Comments:

- There appears to be no coherent plan for the city centre to attract small independent business or perhaps change the usage to residential to bring a vibrancy back. It is a classic doughnut effect where high rates, a lack of investment and out of town shopping centres destroy traditional high streets
- The approach should reflect the need for balance between demand for land for recreational use and making room for nature to ensure biodiversity targets are met
- It is refreshing to see places other than Chelmsford City being considered
- The city is lacking in cultural amenities e.g. art galleries, theatres, purpose-built, flexible open spaces for exhibits/ multi-media. All such additions will bring multiple streams of revenue through the venues, hospitality etc
- Waterways in the area provide excellent opportunities for leisure and healthy living
- Consider how policies might need to be changed or introduced in order to cope with Covid and future pandemics.

<b>Our evidence says</b>
The Retail Capacity Study 2023's qualitative and quantitative assessment of leisure need does not identify any significant gaps in the provision of larger commercial leisure facilities in the plan area.
An updated Open Space, Sports and Recreational Facilities Study and Sports Facilities Strategy has been commissioned and will be used to inform the final draft Local Plan (Pre-Submission Local Plan).
The Retail Capacity Study 2023 recommends that a 500sqm gross threshold for impact assessments should apply to leisure as well as retail proposals.
The Cultural Strategy 2023 provides a long-term vision that recognises the value of culture to us all. It will set our priorities for improving the culture services of the entire district of Chelmsford, including its parishes, the town of South Woodham Ferrers, and the city centre.

<b>The Preferred Options Local Plan</b>
No new floorspace for additional leisure or culture development is proposed in the Preferred Options Local Plan in line with the Retail Capacity Study 2023.
The emerging Open Space, Sports and Recreational Facilities Study and Sports Facilities Strategy will provide up-to-date and robust evidence base on community sports facilities required to support the updated policies in the Pre-Submission Local Plan.
Strategic Policy S5 (Protecting and Enhancing Community Assets) is updated to reflect new Strategic Priority 2 (Promoting smart, active travel and sustainable transport) to change how people make their journeys towards more sustainable and active travel choices. The policy also encourages extensions to existing facilities in line with the NPPF and is updated to reflect changes to the Use Classes Order.
The proposed site allocation policies and Strategic Policy S9 (Infrastructure Requirements) ensure that new development is supported by necessary infrastructure and services including primary schools, green space and health provision.
Strategic Policy S12 (Role of City, Town and Neighbourhood Centres) is amended to reflect changes to the Use Classes Order, downturn in economy, changing retail shopping habitats and to provide greater flexibility for a mix of uses. It also requires leisure proposal to carry out impact assessments, to reflect the findings of the Retail Capacity Study 2023.
A new Strategic Policy S17 (Future of Chelmsford City Centre) is added to the plan. This policy seeks to improve the City's cultural offer, achieve increased footfall, activity and vibrancy, having regard to the Chelmsford Cultural Strategy 2023.
Local Plan policies support the provision in principle of new community facilities such as art galleries and cinemas including Policy DM20 (Delivering Community Facilities).
National Policy - Policy DM20 (Delivering Community Facilities) is updated to encourage flexibility in design and shared use to enhance the sustainability of communities and residential environments, in line with the NPPF.
Policy DM21 (Protecting Community Facilities) is updated to reflect the needs to increase protection of public houses to resist further losses to alternative uses.
There will a further round of public consultation on the final draft or Pre-Submission Local Plan.
There will be additional opportunities to help shape new developments and communities once the new Local Plan is adopted including through the development of site masterplans and planning applications.

## **Part 6 – Spatial Principles and Spatial Options**

This section of the consultation document considers the Spatial Principles that will be used to ensure growth is planned in a sustainable way and underpin the choice of sites to accommodate growth. It also presents five Spatial Approaches for how growth could be distributed in the future review plan.

### **Spatial Principles**

Key statistics:

Question	Yes	No	Comments	Total number of responses
<b>57. Do you agree with the proposed updates to the Spatial Principles? If not, please give the reasons for your answer. Please refer to the Spatial Principle number in Table 7.</b>	52	17	86	155
<b>58. Are there any Spatial Principles you think should be added? Where possible, please support your answer with reference to any evidence.</b>	N/A	N/A	27	27

Summary of Specific and DTC consultees comments:

- General support for the Spatial Principles (Essex County Council, Braintree District Council, Rochford District Council, Anglian Water Services Ltd, Essex Police Fire and Crime commissioner, Mid and South Essex Integrated Care Board)
- None of the Spatial Principles can be measured or used effectively to steer planning applications. They need to be more vigorously and precisely worded and made SMART (South Woodham Ferrers Town Council)
- These principles are not generally being met in the immediate area of some developments and are not being considered across sufficiently wide areas to address impacts in neighbouring parishes (Great Waltham Parish Council)
- Support the additional references to reducing carbon emissions g) and protecting the Green Belt from inappropriate development, as opposed to all development b) (Broomfield Parish Council)
- The use of the word 'promote' in c) indicates a more watered-down approach to building on previously developed land than in the adopted local plan
- Disagree with including development at all settlements set out in the Settlement Hierarchy (Broomfield Parish Council, Great Waltham Parish Council)
- Support spatial principle f), to respect the character and appearance of landscapes and the built environment and preserve or enhance the historic environment and biodiversity (Historic England)
- Reference to the need to protect the best and most versatile (BMV) agricultural land from significant, inappropriate or unsustainable development proposals should be added to f) (Chignal Parish Council)
- Wording of principle g) should be strengthened to 'radically reduce carbon emissions' in line with the NPPF (Essex County Council)
- Enhance principle j) to say 'Ensure that developments and the required infrastructures are deliverable' (South Woodham Ferrers Town Council)
- Add a principle that considers proposed national Infrastructure projects that are known about (South Woodham Ferrers Town Council)
- Add a principle that considers neighbouring Borough developments on the borders (South Woodham Ferrers Town Council, Maldon District Council)

- A spatial principle to encourage the incorporation of renewable energy schemes and energy efficiency into all development sites would make the issue of tackling climate change more central within the Local Plan (Braintree District Council).

#### Summary of General Consultees Comments:

- Agree to all but the exclusion of the Green Belt from development (Newlands Spring Residents Association).

#### Summary of Developer/Landowner/Agent Comments:

- General support for the Spatial Principles (Croudace Homes, Gleeson Land, Dandara, Landvest Developments Ltd, Obsidian Strategic Asset Management Ltd, Bolton, S&D, Persimmon Homes, Dandara Eastern, Mr Alexander Micklem, Ptarmigan Chelmsford A Ltd, Grosvenor Property UK and Hammonds Estates LLP, Redrow Homes & Speakman Family, Bellway Strategic, Richborough Estates, Hill Residential Ltd, Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern), Harris Strategic Land Ltd, Graham Dines, Greystoke CB, Miscoe Enterprises Ltd, Cliffords Group Ltd, A.G. & P.W.H Speakman, The Bucknell Family, Cliffords Group and Mr Mark Peters, Pigeon (Sandon) Ltd, Bellway Homes Ltd)
- Broad support but consider the Draft Plan fails to actually apply them in practice (e.g. missing opportunities to facilitate delivery of flood risk alleviation measures by making partial amendments to the Green Belt) (Vistry Group)
- Plan will need to provide clarity as to how these Spatial Principles will be used and implemented (Dandara, Hill Residential Ltd, Graham Dines)
- Important for the Plan to recognise that it may be difficult for any one Spatial Principle to be considered in isolation (Sempra Homes Ltd, Marden Homes Ltd)
- Suggest condensing the number of principles into a shorter list, or an overarching statement, which conveys the objectives succinctly but avoids unnecessary duplication (Bellway Homes Ltd)
- Paragraph 16 of the NPPF expects Local Plans to serve a clear purpose which avoids the unnecessary duplication of policies that apply to a particular area. It is not considered that Spatial Principles a), e), h), and i) effectively achieve this, or are necessary (Bellway Strategic)
- The replacement of “Optimise the use of suitable previously developed land for development” to “Promote the use of suitable previously developed land for development” unnecessarily dilutes a key Spatial Principle (Dominvs Group)
- Principle ‘e’ should also include reference to development in the Chelmsford Urban Area (Martin Grant Homes)
- There is a need to review the Green Belt as it has not been shown that development in the Green Belt is not the most sustainable pattern of development (Charterhouse Property Group & Charterhouse Strategic Land, Rosehart Properties Ltd, Martin Grant Homes, Taylor Wimpey Homes, Pembridge Land Group, Vistry Group, The Howgego Trust, Gray & Sons, Taylor Wimpey Strategic Land, Hill Residential Ltd)

- Support focusing development outside the Green Belt (Marden Homes Ltd, Sempra Homes Ltd, Mr A Smith)
- Smaller settlements such as Chatham Green should not be excluded from principle 'e', as the Essex Highways Sustainable Accessibility Mapping Appraisal suggests it is a very sustainable location on a transport corridor (Mr and Mrs Andrew Parker, Strutt and Parker (Farms) Ltd)
- Small settlements and those in the Green Belt require some growth to support ongoing provision of existing services and amenities (The Howgego Trust)
- Development should be located in sustainable locations but principal e) has an over reliance on the use of the settlement hierarchy to determine the Spatial Strategy and location of growth (H R Philpot & Sons, Chris Buckenham, C J H Farming Ltd)
- Principle (e) should recognise that locations in lower order settlements, or in the countryside and / or Green Wedge can accommodate modest levels of new development, subject to their sustainability and appropriateness (Hill Farm (Chelmsford) Ltd)
- Spatial Principle g) should be separated into two distinct Principles to ensure clarity in its application (Bellway Strategic)
- As the Council's Settlement Hierarchy is informed by a review of available services, facilities and infrastructure, Principle h) and i) are not necessary (Bellway Strategic)
- Where there are sites located on the end of the existing urban area and meet all of the relevant Spatial Principles, their siting within the Green Wedge should not automatically discount them for development (Mr J Bolingbroke, Sempra Homes Ltd)
- Omission of any recognition for the need to support rural communities and rural economy to provide sustainable development in these locations (Mr and Mrs Richard and Sally Speakman, Cliffords Group Ltd, CJH Farming Ltd)
- More could be included on how development will support and enhance the rural environment and its linkages to the Green Wedge and the importance of social and green infrastructure (Cliffords Group Ltd)
- Could look to accommodate development in locations with the potential to expand further beyond 2041 (Taylor Wimpey)
- Add after e) "Enhance the vitality and sustainability of the other settlements in the local authority area" (Croudace Homes)
- Add the following words at the end of the sentence at e): ", including making appropriate provision for rural housing to maintain the viability and vitality of all villages" (Edward Gittins Associates)
- Add a 'Transport Corridor Spatial Principle' as development should be directed towards sustainable locations across the existing transport corridor to make use of the existing and new transport infrastructure (Strutt and Parker (Farms) Limited)
- Add "Locate development at locations which meet the needs of users and occupiers, and supports economic growth" to better reflect NPPF and PPG requirements (Greystoke CB)
- Add "Promote sustainable growth within the Green Wedge where it is appropriate and respects the role and function of the Green Wedge" (Cliffords Group Ltd, Miscoe Enterprises Ltd, Cliffords Group and Mr Mark Peters)
- Add "Continue and enhance the vitality of rural communities and the wider rural economy, promoting the Green Wedge to support this objective where



development aligns with the role, function and purposes of the Green Wedge’ (Cliffords Group Ltd)

- Add “Ensure the delivery of social infrastructure to serve both existing and proposed communities” (Cliffords Group Ltd, David Lloyd Leisure and Aquila Development Ltd)
- Could amalgamate h) and i) (Dominvs Group).

Summary of Public Comments:

- Admirable but unobtainable principles
- Unclear what ‘inappropriate development’ in the Green Belt would be
- Disagree with protecting the Green Belt as this automatically and unnecessarily limits growth in these areas and damages other areas
- Principle b) should include protecting Green Wedge and Rural Areas from inappropriate development
- Principles b) and f) should be strengthened and adhered to in planning decision-making
- Principle c) should be amend to “Prioritise development on previously developed land”
- Principle e) results in existing settlements being overwhelmed by further development.
- Flood risk and carbon emissions should be separate Spatial Principles
- The link between ensuring necessary infrastructure and encouraging innovation is unclear
- Existing infrastructure should not be stretched so it worsens the experience for existing residence, new infrastructure should be built to support new development
- Add the need to avoid the development of high quality agricultural land
- Replace e) with “Spread development proportionally throughout the Chelmsford Area”
- Review the Green Belt to see if development could be the most sustainable pattern of development.

**Our evidence says**

The Spatial Principles and supporting text reflect the local priorities in the Council’s corporate plan [Our Chelmsford, Our Plan](#).

The Preferred Options IIA 2024 considers that the Spatial Principles will result in diverse effects which reflect the complexity of delivering large-scale development. Generally positive effects are envisaged with development in the urban area, with urban fringe sites requiring mitigation for impacts on environmental resources. Most dwellings and employment land will be delivered in/adjacent to urban areas and Key Service Settlements which have greater capacity in terms of their sustainability to receive growth.

**The Preferred Options Local Plan**

The Spatial Principles are set out in Strategic Policy S1 (Spatial Principles) and remain largely unchanged as they continue to be consistent with national policy and guidance. Some clarification of wording is included in relation to inappropriate

## The Preferred Options Local Plan

development in the Green Belt, carbon emissions, and innovative solutions for active and sustainable travel.

No review of the Green Belt is proposed; the Green Belt will continue to be protected from inappropriate development. It is considered that the purpose of the Green Belt is clear within the Preferred Options Local Plan, as set out in Strategic Priority 4 and Strategic Policy S1 (Spatial Principles).

### Spatial Strategy and Strategic Housing and Employment Land Availability Assessment (SHELAA)

Key statistics:

Question	Yes	No	Comments	Total number of responses
<b>59. Do you support the changes to the methodology and criteria note of the Strategic Housing and Employment Land Availability Assessment (SHELAA)? If you disagree, please explain why.</b>	19	15	30	64

Summary of Specific and DTC consultees comments:

- Should be restricted to those areas which form part of the proposed Spatial Strategy (South Woodham Ferrers Town Council)
- Unsure where the proposed changes are set out (Broomfield Parish Council)
- Local Policy Constraints “Where a site has identified constraints that would prevent the implementation of a vehicle access route to the site” should be amended to refer to ‘...of a safe vehicle access route...’ (Essex County Council)
- The EDG recommends that any residential area should be no further than 600 metres walking distance from a primary school and 1,500 metres from a secondary school via a safe direct route and reference to schools should be amended accordingly (Essex County Council)
- Welcomes the inclusion of community facilities and renewable power generation in the 2022 SHELAA Assessment Criteria (Essex County Council)
- ECC will be undertaking a countywide assessment to identify potential areas of land which could be suitable for solar and wind schemes. The outputs could potentially be added to the SHELAA criteria (Essex County Council)
- Support the inclusion of a suitability criteria relating to ‘mineral and waste constraints’ but that this process also considers the land around the site in order that its allocation/development does not constrain any potential future use for mineral extraction and subsequent amendments be made to the suitability criteria for this section (Essex County Council)
- Whether prior extraction for minerals is practical at the site should be considered in the context of the non-mineral development, taking into account the estimated value of the mineral, a restoration scheme and the viability of the proposed non-mineral development (Essex County Council)

- To align with the ECC Developers Guide the threshold in the site assessment measure stated as ‘Development that would yield 10 or more dwellings is considered to add strain on existing facilities unless such facilities are incorporated within the proposal’ be increased from 10 to 20 (Essex County Council).

Summary of General Consultees Comments:

None.

Summary of Developer/Landowner/Agent Comments:

- Support for the proposed changes (Charterhouse Property Group & Charterhouse Strategic Land)
- There are gaps in the methodology (though not stated what those are) (Dominvs Group)
- Support the changes but note it must be carried out on a “policy-off” basis and allow for consultation on the outputs once published (Obsidian Strategic Asset Management Ltd)
- Welcome the introduction of a set of criteria and scoring for mixed use sites (Grosvenor Property UK and Hammonds Estates LLP)
- Needs to be more done to factor in large sites which contain features such as Heritage Assets to ensure these do not skew the results of the assessment (Grosvenor Property UK and Hammonds Estates LLP)
- A second “policy on” assessment, having regard to policy constraints identified and the extent to which these can be mitigated should be undertaken to ensure compliance with para 002 (Reference ID 3-002-20190722) of the PPG (Bellway Strategic)
- Needs to recognise that the presence of constraints, such as flood risk, on small areas of larger strategic scale sites does not represent an absolute constraint to the development of that site (Bellway Strategic)
- Needs to distinguish between policy constraints and physical constraints (Mr J Bolingbroke, Sempra Homes Ltd)
- Green Wedge should not be considered a constraint to residential development as land with this designation should be reviewed, and may be found it should not remain as Green Wedge as part of the review (Mr J Bolingbroke, Sempra Homes Ltd, Miscoe Enterprises Ltd, Cliffords Group Ltd)
- Consultation document does not provide details of changes to the methodology and criteria note of the SHELAA, further opportunity to comment on the methodology would be welcomed (Richborough Estates)
- Comments made on the previously published 2021 SHELAA methodology and scoring for sites, requesting these are reviewed (Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern))
- An additional level of refinement should be introduced such that sites within 400m of public transport are scored 3 under PROW and Cycling Connectivity (Greystoke CB)
- It should be made clear that the SHELAA is an evidence base document and that site allocations are made in the Local Plan (Greystoke CB)
- Criteria note and scoring mechanism is unduly complex (Martin Grant Homes)

- Scoring for minerals should be removed or significantly altered as it does not necessarily hinder development of a site (Martin Grant Homes)
- Premature to rule out Green Belt sites as it has not been established that a Green Belt Review is not required (Martin Grant Homes)
- Unreasonable to score a site as 0 out of 5 if it is anticipated that some level of ground remediation is required (Martin Grant Homes)
- Unreasonable to score a site negatively under 'Neighbouring Constraints' without providing a written explanation as to what the Council perceive to be a "constraint with no potential for mitigation" (Martin Grant Homes).

Summary of Public Comments:

- Criteria listed seems to be incomplete and should include impact on neighbouring communities
- Approach is fair and balanced
- Greater protection should be given to the River Chelmer and the Chelmer Valley.

<b>Our evidence says</b>
The assessment of vehicle access includes where there is current access (highest score) and no visible constraints likely to prevent implementation of a route to enable vehicle access in paragraph 4.8 of the Criteria Note of the SHELAA 2022/2023. This avoids the qualitative determination of whether an access could be made safe, which is not something that can be determined in a desktop exercise.
No action was taken in relation to the Criteria Notes assessment of proximity to key services as current distances align with adopted Integrated Impact Assessment (IIA) for the Local Plan. The IIA will be kept under review in the Local Plan Review process and any relevant amendments will be made to the SHELAA Criteria to mirror any changes that might in future be made to the former.
The minerals and waste constraints assessment section in the Criteria Note was agreed with Essex County Council prior to publication of the SHELAA 2022/2023. The criterion was amended to align better with the Minerals Local Plan and Waste Local Plan and the capped criteria relating to Minerals and Waste has been removed.
The impact on community facilities was amended to a yield of 20 or more to align with the ECC Developers Guide in the Criteria Note of the SHELAA 2022/2023.
The impact on Designated Heritage Assets is not a capped constraint in the Criteria Note of the SHELAA 2022/2023 therefore cannot skew the results for any site.
National Planning Practice Guidance states that plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites. Whilst the key purpose is to identify sites and their constraints, this does not mean that they are completely ruled out. Also, the assessment does not in itself determine whether a site should be allocated for development. A comparison of sites based upon performance against specific criteria is already possible through the provision of individual scores against each criterion - to make this easier, we have added in a total score field to the site output report. The Green Belt designation is a national policy constraint and is consequently awarded a Red RAG rating in the Criteria Note of the SHELAA 2022/2023.

### Our evidence says

A Green Wedge designation is a local policy constraint so is consequently awarded an Amber RAG rating in the Criteria Note of the SHELAA 2022/2023. This includes the river valleys and therefore recognises the contribution/value of these assets in the Criteria Note of the SHELAA 2022/23. This approach is in line with Local Plan policies and the IIA.

The impact on Flood Risk is not a capped constraint and is differentiated in the percentage area of the site affected in paragraph 4.17 of the Criteria Note of the SHELAA 2022/2023.

It was not considered appropriate to combine cycling/PROW with public transport.

Neighbouring constraints are explained in paragraph 4.20 of the Criteria Note of the SHELAA 2022/2023.

### The Preferred Options Local Plan

The SHELAA assesses on a high-level basis the likely development potential of sites submitted by landowners and developers.

Paragraph 69 of the NPPF sets out that local authorities are required to undertake land availability assessments to establish an understanding of what sites within the administrative area may be suitable, available, and achievable for development.

The SHELAA serves as an evidence-based document identifying a wide range of site characteristics, highlighting the strengths and constraints that sites may face in achieving the local authority requirements and establishing the likelihood of site developability/deliverability. It is not the purpose of the SHELAA to allocate land for future development, that is for the Local Plan. The role of the SHELAA is discussed in the alternative for the proposed site policies identified for delivering the preferred Spatial Strategy.

Key statistics:

Question	Yes	No	Comments	Total number of responses
<b>60. Do you support the approach taken to review the Spatial Strategy? If you disagree, please explain why.</b>	32	17	59	108

Summary of Specific and DTC consultees comments:

- General support for the approach to the review or the need to review the Spatial Strategy (Essex County Council, Basildon Borough Council, Braintree District Council, Rochford District Council, Braintree District Council, Maldon District Council, South Woodham Ferrers Town Council, Chignal Parish Council, Writtle Parish Council)
- The review should lead to something conclusive that can be taken forward. Currently, the strategy just allows everyone to propose a site to be assessed on rules or approaches that cannot be measured or understood within the context of the Local Plan (South Woodham Ferrers Town Council)

- The review should reflect the new Vision for a greener approach to building stronger communities with community and transport infrastructure and improved health and wellbeing (Chignal Parish Council)
- Unclear whether the review is a fundamental review or whether it is just monitoring the outcomes of the Strategy so far and applying the same Strategy to updated circumstances. Support a more fundamental re-alignment of the Spatial Strategy because: a) There is now an even greater national emphasis on the need to reduce carbon emissions through transport; and a greater emphasis on well-being and quality of life; b) The new Vision is more about achieving ' a greener, fairer and more connected community and not so much about 'cementing the existing successes ..from growth' and from new City Status (Broomfield Parish Council)
- Welcome CCC meeting its full housing needs within its administrative boundary to 2041 including the 20% buffer. Any preferred spatial approach will need to have regard to the settlement hierarchy (Essex County Council)
- CCC should work with the Climate Change Unit to deliver on net zero and improve climate resilience by building with nature. It is important to embed climate change in local plan-making (Essex County Council)
- The carbon impact of the preferred spatial approach should be assessed and used to help steer the Spatial Strategy in a way which responds to the stated priorities on climate and ecological emergency and demonstrate alignment with local and national climate targets (Essex County Council).

#### Summary of General Consultees Comments:

- General support for the need to review the Spatial Strategy (North West Parishes Group, Chelmer Housing Partnership)
- The Chelmer Valley landscape is of great visual, natural, historic and archaeological interest and needs greater recognition and enhanced conservation. The Green Wedge should be extended to include more of the valley slopes. It is an ideal location to develop landscape scale nature recovery and an integrated approach to the historic and natural environment (Chelmer Valley Landscape Group)
- CCC should not rely on strategic sites and new settlements in the short to medium term given such allocations are often slow to come forward. This does not mean we do not support the delivery of new settlements, but it can often reduce the number of smaller sites allocated that are essential to supporting SME house builders (Home Builders Federation)
- Growth in allocated sites to west of the city is not agreed as local infrastructure especially roads is inadequate and cannot easily be upgraded resulting in overloading. Growth should be allocated where there will be good transport along transport corridors – North-East Bypass and A131/130 (Newlands Springs Residents Association)

#### Summary of Developer/Landowner/Agent Comments:

- General support for the approach to review or the need to review the Spatial Strategy (Bellway Strategic, Croudace Homes, Dandara, Taylor Wimpey, Taylor Wimpey Strategic Land, Obsidian Strategic Asset Management Ltd, Grosvenor Property UK and Hammonds Estates LLP, Richborough Estates, Gladman Developments Ltd, Gleeson Land, Cliffords Group Ltd, David Lloyd

Leisure and Aquila Development Ltd and Mr Mark Peters, Bolton, S&D, Pembrige Land Group, Rosehart Properties, Wates Developments Ltd, Inland Homes, Strutt and Parker (Farms) Limited, Redrow Homes & Speakman Family, Mr and Mrs Andrew Parker, A.G. & P.W.H Speakman, Chris Buckenham, Mr Alexander Micklem, Robert Robarts & Susan Balls, Wates Developments Limited)

- Simply continuing or extending the existing adopted Spatial Strategy, without a review, will be a much riskier approach, particularly as the existing strategy relies on a small number of very large allocations, which have long lead-in times and face significant challenges. The latest NPPF emphasises the contribution that small and medium sized sites can make and recognises that these sites are often built out relatively quickly (Croudace Homes)
- The timing of the new strategic transport infrastructure coming forward represents a strong opportunity for Chelmsford to take a holistic approach to new housing locations (Wates Developments Limited)
- There are a number of issues with the methodology and conclusions of CCC's assessment of the five spatial approaches. The approach to sites in ECC's Accessibility Mapping is not consistent. A suggested Potential Accessibility score has been attached (Grosvenor Property UK and Hammonds Estates LLP).

#### Summary of Public Comments:

- Agree with the principle of reviewing the Spatial Strategy
- Current Spatial Strategy is fit for purpose and does not need modification
- CCC has allocated development to South Woodham Ferrers without looking at the full picture of the area such as the need for new infrastructure and by carrying out traffic surveys at the wrong time of day
- Increase in traffic generated to the North of South Woodham Ferrers cannot be measured because the development does not yet exist, and the existing traffic studies are significantly flawed so there can be no confidence in any projections post development
- The proliferation of urban sprawl is detrimental to the character of the countryside. Hammonds Farm is typical of this encroachment of the town into the countryside
- Support the retention of the Green Wedges which are absolutely vital for the continued success of the city being an invaluable corridor for both people and wildlife
- Disagree with growth in allocated sites to the West of the city. Local infrastructure especially the roads are inadequate and cannot be upgraded to increase capacity resulting in overloaded and a congested road network. Growth should be allocated to sites where there are good transport links, along transport corridors and with access to the new railway station, and where the local infrastructure, particularly the roads, can be easily upgraded
- The agricultural land in West Chelmsford beyond Newlands Spring is excellent for that purpose. The UK needs to retain and increase its own agricultural especially in view of the effects of the war in the Ukraine. Chelmsford needs to take into account this bigger picture and play its part in a new way forward for the UK

- Stop the Sandford Mill development if you care about the planet. Politicians, councils and governments only care about money and the interests of big business. Your actions are contrary to your words
- Growth in allocated sites to west of the city is not agreed as local infrastructure especially roads is inadequate and cannot easily be upgraded. Growth should be allocated where there will be good transport along transport corridors – North East Bypass and A131/130.

<b>Our evidence says</b>
The Strategic Housing Needs Assessment (SHNA) 2023 supports the housing requirement of 1,000 new homes per annum for the preferred Spatial Strategy.
Experience has shown that applying a supply buffer of around 20% will help provide flexibility in the supply of housing sites and to ensure that the housing requirement is met.
The Employment Land Review 2023 considers current economic trends and future requirements for new employment floorspace up to 2041. The preferred Spatial Strategy proposes new employment sites totalling around 110,000sqm in addition to existing allocated employment sites in the adopted Local Plan. These seek to meet an employment land shortfall of around 110,000sqm (Scenario 3 in the review).
The Retail Capacity Study Update 2023 finds that there is no need to allocate new sites for retailing and that there are no significant gaps in the provision of larger commercial leisure facilities in the area. In line with the study, no proposed new retail allocations are proposed in the Preferred Options Local Plan.
The Parish Audit 2024 is a technical assessment of key services, facilities, and bus provision available to residents within villages and parishes across the Council's area. It supports the Settlement Hierarchy in the preferred Spatial Strategy.
The Local Plan Viability Report 2023 provides a high-level viability of different typologies of development sites that could come forward through Local Plan allocations. The assessment supports the site allocations in the preferred Spatial Strategy.
The Strategic Housing and Economic Land Availability Assessment (SHELAA) 2023 assesses land promoted for new housing and employment development. This is supplemented by the Urban Capacity Study 2024. The sites identified in the preferred Spatial Strategy are promoted for development and supported by the SHELAA 2023 and Urban Capacity Study 2024.
Drawing on the wider plan evidence base, national planning policy and guidance and the Issues and Options consultation responses to the five Spatial Approaches, three Spatial Strategies were developed for detailed technical testing in 2023. The Transport Impact Appraisal of Spatial Approaches 2023 assesses the relative impact of additional development traffic on the future capacity of links and junction on the road network of the three Strategies. The Landscape Sensitivity and Capacity Study 2024, considers the landscape sensitivity and resulting capacity for the development proposed in the three Strategies. The Water Cycle Study Scoping Report 2024 provides a high-level assessment of the three Strategies on water infrastructure. The outputs from the technical studies identify positives and negatives associated with each Strategy. The outputs have been used alongside other plan evidence and national policy, to inform the employment and housing



## Our evidence says

site allocations included within the preferred Spatial Strategy which has been subject to further technical testing – see below.

The following traffic modelling has been undertaken:

Sustainable Accessibility Mapping and Appraisal of Sites 2022 – this assessed 25 settlement areas identified across the five spatial approaches in the Issues and Options consultation document on their level of sustainable connectivity to key urban centres, employment, rail stations, bus services and bus stops, healthcare and education. They were also assessed on their digital connectivity highlighting the ability for residents to work from home thereby reducing peak hour journey trips on the local transport network. It should be noted that the appraisal assesses the current accessibility and connectivity of the locations and at this stage does not take into account future uncommitted infrastructure improvements which might come forward to support new development.

Transport Impact Appraisal of Spatial Approaches 2023 – this sets out the modelling methodology, results, and findings of the traffic impact appraisal of three selected Spatial Strategy options, identified following the Issues and Options consultation. The evidence shows that, in terms of overall network impact (severity and breadth) and without considering the scope for mitigation, option 2 is modelled as having the smallest impact, and option 3 as having the largest. Option 1 is characterised as having a broader, but less pronounced impact on the road network.

The wider cross boundary impacts are included in the relevant assessments.

Transport Impact Appraisal of the Preferred Spatial Approach 2024 - sets out the modelling methodology, results, and findings of the traffic impact appraisal of the Spatial Strategy included within the Preferred Options. It concludes that impact on traffic is largely limited to the A12 corridor, the junctions along it and, to a lesser extent, the A1114 and A132 corridors into Chelmsford City Centre. Overall, the allocation of development in the Preferred Options consultation document provides the opportunity to make good use of existing and potential sustainable accessibility to and from proposed sites. However, this will be dependent on the delivery of the bus, cycling and walking infrastructure proposed, as well as additional measures required to provide the necessary connectivity to the wider sustainable transport network. This will be crucial to ensure that the growth in trips associated with the proposed development is managed and does not have a negative impact on the surrounding local area. 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.

The Water Cycle Study Reports 2024 indicates no major concerns with respect to water supply to cater for proposed level of new growth. Chelmsford Water Recycling Centre (WRC) catchment, where the majority of development is being proposed for the plan period up to 2041, has significant spare capacity and can accommodate the proposed development including the East Chelmsford Garden Community, Bicknacre, East Hanningfield and the employment allocations. They also identify constraints to development growth in Chatham Green due to constraints at Great Leighs WRC. The studies support the preferred Spatial Strategy.

The Preferred Options IIA 2024 assesses positives and negatives associated with the preferred Spatial Strategy and reasonable alternatives in terms of sustainability, health and equality. The Preferred Spatial Strategy is assessed to

### **Our evidence says**

be the most sustainable especially in terms making best use of previously developed land, meeting the housing need and supporting sustainable economic growth.

The Infrastructure Delivery Plan (IDP) 2023 supports the levels of growth and locations of growth over the new plan period and considers that the required new infrastructure improvement and investment is feasible and deliverable. Overall, the IDP supports the preferred Spatial Strategy.

The Housing Sites Schedule April 2023 details allocated sites for housing and non-allocated sites which have come forward in the planning process. It supports the proposed housing allocations in the preferred Spatial Strategy.

### **The Preferred Options Local Plan**

The Preferred Spatial Strategy has been developed using national policy, relevant policies and strategies, engagement with key stakeholders, feedback from the Issues and Options consultation, and the plan evidence base including testing of options through the IIA (as described above).

The Preferred Spatial Strategy reflects the proposed updated Vision and Strategic Priorities of the plan including Strategic Priority 1 Addressing the Climate and Ecological Emergency.

The Preferred Spatial Strategy is an evolution of the five spatial approaches tested at Issues and Options stage and three Spatial Strategies tested in 2023.

Overall, the preferred Spatial Strategy meets housing, employment and Travelling Showpeople needs in full, protects the Green Belt, and allocates new development in sustainable locations.

Unbuilt site allocations in the adopted Spatial Strategy including West of Chelmsford and North of South Woodham Ferrers have been rolled forward into the preferred Spatial Strategy as they continue to represent sustainable and sound development allocations.

The Preferred Spatial Strategy includes a mix of different types and sizes of site allocations that will come forward throughout the plan period.

Alternative Spatial Strategies and site allocations have been considered, tested and rejected as they perform less well than the preferred Spatial Strategy and site allocations. Discounted locations for further housing growth include South Woodham Ferrers, Boreham, Broomfield and West of Chelmsford. These are too constrained and unsuitable for further development growth over and above that in the adopted plan.

Further information on the approach to the Spatial Strategy and site selection is set out in the Preferred Options Spatial Strategy and Strategic Sites Topic Paper.

The Green Wedge boundaries are around the main river valleys as set out in the Green Wedge evidence base reports.

Key statistics:

Question	Yes	No	Comments	Total number of responses
<b>61. Do you agree with the scope and classification of individual settlements within the Settlement Hierarchy? If you disagree, please explain why. Where possible, please support your answer with reference to any evidence.</b>	33	13	42	88

Summary of Specific and DTC consultees comments:

- General support for the proposed Settlement Hierarchy (Essex County Council, Braintree District Council, Rochford District Council, South Woodham Ferrers Town Council, Writtle Parish Council)
- Supports the conclusions of the Sustainable Accessibility Mapping and Appraisal. If Spatial Approach E (including Hammonds Farm) were selected, consideration would be required as to where this would sit within the settlement hierarchy, and whether its position in the hierarchy would be phased relative to when key services are provided etc (Essex County Council)
- Boreham and Great Leighs are Key Service Settlements in close proximity to Great Notley and Hatfield Peverel in Braintree District. They are classified as a District Centre and Key Service Village respectively reflecting the significant population in that area, and the fact that they offer services which support nearby smaller communities, including residents from cross border communities. It is important to retain and improve services close to the communities they serve, and this can be helped by providing appropriate growth to support those services in terms of population and additional financial contribution to existing services (Braintree District Council)
- Disagree that South Woodham Ferrers is well-connected. It is unsuitable for any further large scale development which would mean further loss of open space/agricultural land and the green necklace (South Woodham Ferrers Town Council).

Summary of General Consultees Comments:

- General support for the Settlement Hierarchy (Newlands Springs Residents Association, Chelmer Housing Partnership)
- The use of the existing Settlement Hierarchy as a way of allocating new development in a sustainable way is not supported as it is too broad-brush and simplistic. All settlements are different (North West Parishes Group).

Summary of Developer/Landowner/Agent Comments:

- Support expressed for the proposed Settlement Hierarchy (Landvest Developments Ltd, Vistry Group, Dandara, Bellway Strategic, Bellway Homes Ltd, Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern), Richborough Estates, Marden Homes Ltd, Croudace Homes, Rosehart Properties Ltd,

Strutt and Parker (Farms) Ltd, Gladman Developments Ltd, Gleeson Land, Pembridge Land Group, Grosvenor Property UK and Hammonds Estates LLP, Cliffords Group Ltd and Mr Mark Peters, Mr Alexander Micklem, Robert Roberts & Susan Balls)

- Given the magnitude of difference between the scale and services of the city and the town of South Woodham Ferrers, it is worthy of its own separate classification (Dominvs Group)
- Owing to its vastly superior service provision and employment opportunities and its status as a regional centre, Chelmsford should sit alone at the top of the Settlement Hierarchy. It should be cited as Chelmsford Urban Area reflecting the glossary which confirms that Great Baddow, Springfield and Broomfield form part of the Chelmsford Urban Area and reflecting the excellent sustainability credentials of these areas (Martin Grant Homes)
- There should be an updated Settlement Hierarchy study. Broomfield is much better connected to the main regional centre of Chelmsford. It contains the Council's largest single employer, Broomfield Hospital, a secondary school and other services. It would be more appropriate to have a top tier – "Greater Chelmsford", with Broomfield and South Woodham Ferrers at the second tier (Obsidian Strategic Assess Management)
- The most sizeable proportion of new growth should be directed to Chelmsford City, which provides the greatest opportunity to address the Council's Strategic Objectives at scale, and in a way that is most sustainable. This is supported by the Employment Land Review (2015) and the IIA (Dandara)
- The Spatial Strategy should be strongly informed by the proposed Settlement Hierarchy (Bellway Strategic)
- The 'category' names used within the Settlement Hierarchy do not align with the 'location types' used with the growth approaches outlined by the Council in the Issues and Options document (Pegasus Group)
- Boreham should be identified at a higher level in the Settlement Hierarchy than other Key Service Settlements or at least as a higher priority for development due to the new rail station and employment nearby in Springfield and planned at Beaulieu Park (Wates Developments Limited)
- Given CCC's objective to maintain protection of the Green Belt, it is important that the distinction remains between Key Service Settlements within and outside the Green Belt. This creates an 'A' and a 'B' list of Key Service Settlements ensuring that growth is distributed to the most sustainable locations (Bellway Homes Ltd)
- Rettendon Place could become a 'Key Service Settlement' in due course. Disagree with some findings presented in ECC's Sustainable Accessibility Mapping & Appraisal. The findings for "SA6e. Rettendon Place" in Appendix E of the Technical Note should be amended to address a number of errors which will lead to the Site Average RAG Score for increasing from 1.43 (Red) to 1.79 (Amber) (Croudace Homes)
- Chatham Green has scored 1.79 in Essex Highways Sustainable Accessibility Mapping Appraisal of the New Local Plan Review for Sustainability. This score is higher than many bigger villages including Great Leighs. The classification of individual Settlements within the Settlement Hierarchy should be changed to allow smaller sustainable settlements such as Chatham Green to be considered for development (Mr & Mrs Andrews)
- Note the potential of new development to increase the sustainability of a settlement which would change its position in the hierarchy such as Chatham

Green which has the potential to become a service settlement (Strutt and Parker (Farms) Ltd)

- The Settlement Hierarchy should be used as a guide, and not as a robust tool, to inform the Spatial Approaches. For example, Chatham Green is identified as a small settlement and is typically categorised as a less sustainable settlement based on its limited facilities. However, through the emergence of planned strategic infrastructure (Chelmsford North East Bypass) and potential associated strategic level growth of a critical mass to deliver community infrastructure, the sustainability of a smaller settlement should be viewed in a wider spatial context (Mr Alexander Micklem)
- Query the clarity of Table 8 and Approach C as to exactly which settlements are to be regarded as "Smaller Settlements". The six "Smaller Settlements" listed in Approach C are the "Service Settlements" in Table 8, but these are different villages to the "Smaller Settlements" in the Adopted Local Plan (Edward Gittins Associates).

#### Summary of Public Comments:

- Support expressed for the proposed Settlement Hierarchy
- Ford End should not be classed as a Service Settlement as the only 'service' available is a small village school. It is a small village and should be classified as a small village only
- Smaller villages need to be protected to ensure they remain distinct and are not built into a super urban area. Chelmsford has swallowed Writtle, Broomfield and Sandon and is now encroaching on the Walthams, Boreham, Great Leighs and Danbury. In 20 years, there will be no obvious boundary between Maldon, Chelmsford, Witham and Braintree
- Some of the "larger" villages are already at the maximum point of size (schools, doctors, traffic etc). Better to put development in Chelmsford where people can walk or cycle to all services
- Writtle may have a few services, but these are diminishing as businesses close and as services become overloaded. There is also little opportunity for expansion within the village boundaries themselves so should it be declassified or have a finer grain of settlement classification?
- Consider that Rettendon Common has been thought to have facilities which it does not have. If more houses are put here, there will be more traffic on the A1245, the Turnpike and East Hanningfield Road, which is already a problem with fast cars.

#### **Our evidence says**

The Parish Audit 2024 is a technical assessment of key services, facilities and bus provision available to residents in the settlements across the Council's area, excluding Chelmsford and South Woodham Ferrers. It concludes that the amount and types of services and facilities for each settlement remains very similar to the 2018 Audit which informed the adopted Local Plan. The 2024 Parish Audit supports the Settlement Hierarchy in the preferred Spatial Strategy.

## The Preferred Options Local Plan

In accordance with the Parish Audit 2024, no changes have been proposed to the Settlement Hierarchy. Likewise, all settlements fit within the definitions of the different categories of settlements provided in the Audit and it is not considered necessary to provide any additional tiers or amended categories as suggested by some respondents.

No additional growth is proposed in South Woodham Ferrers over and above that allocated in the adopted Local Plan.

Distributing growth based on the settlement hierarchy (amongst other considerations including site availability and constraints) is an appropriate approach.

Key statistics:

### Q62. How do you feel about the types of locations for potential housing development growth?

	Strongly support	Support	Neither oppose or support	Oppose	Strongly oppose	Comments
<b>Growth in urban areas</b>	38	20	6	0	4	652
<b>Expanding allocated sites</b>	10	19	15	9	13	
<b>Growth along transport corridors</b>	20	24	18	6	4	
<b>Development at larger villages</b>	11	21	17	13	12	
<b>Development at smaller villages</b>	4	13	12	18	21	
<b>Large new settlement/garden community</b>	19	10	9	31	486	

This question focused on the type of location as set out in the above table, to which many respondents addressed their comments. However, the same section of the document (Part 6) set out the five potential Spatial Approaches. Each of these comprised a mix of the types of location, and therefore drew specific comments to those Approaches. The summary comments below are ordered by the Spatial Approaches, the type of location, followed by other comments, for each of the consultee groups.

Summary of Specific and DTC consultees comments:

#### Approach A, and mixed approaches

- Development at Danbury & Bicknacre and to the East of Chelmsford would have a higher degrading effect on the road users (both bus and car) of South

Woodham Ferrers; place a significant weighted increase on the A12/A130 junctions and the 'back-roads' from South Woodham Ferrers to Chelmsford; and require multiple car transports for the average family (South Woodham Ferrers Town Council)

- A and B - development in the city centre and at the Chelmsford Garden Community is logical; expansion in East and West Chelmsford can be accommodated within existing infrastructure; limited expansion of Boreham, Broomfield, or Great Leighs could be accommodated, but Danbury and Bicknacre are at capacity. Concern is for South Woodham Ferrers infrastructure where rail services are running at optimum levels and the single carriageway A132 through Rettendon Turnpike is at hopelessly congested levels now (Rettendon Parish Council)
- A and C – any further allocation of housing to Danbury would not be sustainable; the Neighbourhood Plan is allocating sites for around 100 houses and has selected those with the least impact on the A414, rural/protected lanes, heritage and environmental assets, landscape and the Air Quality Management Area; other sites are significantly constrained; growth in the settlements that are served by Danbury would also impact on traffic, local services, and recreational pressure on the Sites of Special Scientific Interest (SSSIs) (Danbury Parish Council)
- A, C and E - would have a significant impact on the road network leading to Maldon and Burnham, not only the main roads but also the rural road network; particular concern over the level of development proposed in South Woodham Ferrers, Woodham Ferrers, Bicknacre and in and around Danbury and impact on inward and outward traffic flows for employment and education purposes (Maldon District Council)
- A to D – each propose additional houses at South Woodham Ferrers, with a detrimental effect on the only major route to and from the Dengie. The B1012/A132 is a key road corridor, including for Dengie residents who are highly dependent on it for commuting, commercial deliveries, and emergency services. Concerned about the impact on emergency response times for ambulance and fire services (North Fambridge Parish Council)
- A to D - although no housing growth is indicated for Chignal parish, development in the neighbouring parishes could impact Chignal's rural landscape and identity and have visual impact on the Pleshey and Writtle Farmland Plateau, increase rat running traffic on narrow rural lanes and add to the pressure on already stretched community services such as GP surgeries and primary schools (Chignal Parish Council)
- A to D - further expansion of West Chelmsford is not supported, and the current plans for 880 houses should not be exceeded; a larger allocation was rejected during previous consultation (Writtle Parish Council)
- A to E - any future expansion of Chelmsford Garden Community area must be undertaken with regard to the capacity of infrastructure and roads and the impact on local services including health provision and schools (Little Waltham Parish Council).

### **Approach B**

- Potentially provides the least carbon intensive approach but would need to be supported by a whole life carbon assessment (Anglian Water Services)
- Unclear as to why only option B seeks to fully optimise growth in the city centre by aiming to secure 2,500 new homes there, when all other options

only seek to secure an additional 1,000 homes in this location. Optimisation of brownfield sites in town centre locations is supported (Castle Point Borough Council)

- Would best serve the residents of South Woodham Ferrers, apart from possible degradation of the peak time train through service to London due to extra track slots being required to carry more commuters from Chelmsford. It would attract less road use of all the options, more cycle use, and more car-pooling (within the central city area). In addition, the small development to the East of Chelmsford may assist South Woodham Ferrers in receiving a better bus service. 1,500 properties in total is sufficient for this site (South Woodham Ferrers Town Council)
- Favoured for its combination of growth in urban areas and expansion of allocated sites (Springfield Parish Council).

### **Approach C**

- Do not believe that developing numerous smaller sites will be beneficial to those communities. Effectively, there would be 7 communities that would have increased residential use, and this would place a high burden on all the roads between South Woodham Ferrers and Chelmsford (South Woodham Ferrers Town Council)
- Adding more housing to the 118 houses that have permission (adding 25% to the current housing number) would overwhelm the local infrastructure and destroy the character of the village. The school has no additional capacity, and the shop cannot expand (East Hanningfield Parish Council)
- Chelmsford Garden Community remains logical but reducing the number in the city centre misses a golden opportunity to fully develop brownfield options close to all facilities. East and West expansion remain a favourite given the proximity of facilities and networks there. Limited expansion of Boreham, Broomfield, or Great Leighs could accommodate development with current road networks, but Danbury and Bicknacre are at capacity already (Rettendon Parish Council)
- Development in the Smaller Settlements will cause difficulties due to lack of infrastructure even if spread equally to all 6 settlements. Concerns about Rettendon Place proposal due to poor access, extensive street parking causing access problems; lack of adequate infrastructure; cannot sustain a further doubling of homes. Better to carefully consider modest expansion of each village envelope to allow organic growth of developments of 5-10 units (Rettendon Parish Council)
- C and D - unlikely to be as sustainable as other approaches in terms of capital carbon and investments required in future infrastructure requirement (Anglian Water Services).

### **Approach D**

- Opposed to the potential development of Chatham Green, a small rural hamlet of considerable charm with a number of listed properties. Development would be detrimental to the historic character and appearance of the area and would overwhelm the hamlet, which should be preserved rather than developed (Little Waltham Parish Council)
- Would cause extreme problems for the A130 and connecting to it as well as turning the old A130 into a major road again, resulting in more congestion at Rettendon Turnpike and at the A130/A12 interchange. It's already poorly



designed and will carry a lot more traffic when the Lower Thames Crossing, and the Chelmsford North East Bypass open. It creates largely isolated communities away from the current urban areas (South Woodham Ferrers Town Council)

- Concerns relating to infrastructure, development, retail and commercial (Galleywood Parish Council)
- Support, apart from the inclusion of West Chelmsford which does not fit with the locations on transport corridors in this Approach (Writtle Parish Council)
- Development at Chatham Green, Howe Green and Rettendon Common is not supported – all have already been extensively developed with very limited infrastructure and facilities. Rettendon Common has a poor road network without access/junction to the A130, so all traffic has to use the old road. There is no school, doctors nor shopping facilities in Rettendon Common; local transport is either infrequent or non-existent (Rettendon Parish Council)
- D and E - there are existing capacity challenges at the junctions along this route, we wish to understand how these issues have been considered and addressed as a part of the spatial approach (Castle Point Borough Council).

### **Approach E**

- Would require significant infrastructure but it offers significant opportunities for a sustainable, zero carbon community where integrated water management can be delivered from the outset e.g. community rainwater harvesting and water reuse. The lead-in times for new settlements are considerable and only a proportion of the growth required for the plan period could be accounted for if this strategy is selected (Anglian Water Services)
- It will become a car-centric development despite all the schemes promoted to alleviate it; attract all the available infrastructure investment for many years; prioritise solving the Dengie area traffic problem through Danbury rather than through South Woodham Ferrers; create a burden for the road systems east of Chelmsford without the benefits of city centre living; and cause the loss of a large area of green/agricultural land at a time when the UK should be considering how it can be more self-reliant on food production (South Woodham Ferrers Town Council)
- Oppose for multiple reasons:
- Transport infrastructure - including minor and major arterial roads and A12 congestion; the potential impact of the creation of a new rail station at Boreham; completion of the development of additional housing and related development in Northeast Chelmsford; pressures arising from further development at Maldon and Heybridge; creation of an East-Chelmsford bypass; impact of the new Thames underpass to Kent; the A414 through Danbury traffic modelling has shown acute pressures arising at peak times from traffic travelling between Maldon and Chelmsford, and beyond; impact on protected lanes; impact on traffic in Boreham itself; potential traffic for power station construction
- Infrastructure - existing schools are at full capacity; the existing medical practice is struggling to meet community needs; Danbury has only small shops with limited parking; there are restricted Leisure facilities (Danbury community hall and sports field and Paper Mill Lock) which are at capacity
- Other Considerations - the A12, and the Chelmer and Blackwater Valley, together provide a natural and coherent eastern boundary to Chelmsford and should be used to limit to strategic development avoid urban sprawl;

development would have a profoundly destructive effect on the countryside; farmland should be retained for food production; a new settlement is likely to be harmful and destructive of the integrity of that community (Little Baddow Parish Council)

- The reasons that Hammonds Farm was rejected following assessment for the adopted Local Plan are still valid; concerns about traffic flows, loss of a buffer between Sandon and the A12, increased pressure on services (Danbury Parish Council)
- The best fit with the Spatial Principles, and would be a well-planned sustainable development (Chignal Parish Council)
- A preferred area that can take around 12,000 homes and would be best placed in the next local plan from 2036, the favoured option is Option E and then after that Option B and then option D. The Parish Council are looking for minimal further development to be considered for the Leighs area of the plan, due to designated development already included (Great and Little Leighs Parish Council).

### **Other comments**

- Propose a combination of elements from Approaches B (Chelmsford City Centre and Urban Area at 2,500), D (Howe Green and Rettendon Common at 1,500) and E (North East Garden Community at 4,500) – to exceed the 8,000 shortfall (Writtle Parish Council)
- A full housing scenario test will be needed to assess the impact of and suitability of individual development sites, particularly in terms of available school capacity, need for new schools, expansion of existing schools, and any need for school transport (Essex County Council)
- Large-scale development will be expected to provide for the needs of post 16 education, and Special Educational Needs (Essex County Council)
- Increased density of development should maximise sustainable movement infrastructure, and more innovative ways to tackle behavioural change, rather than by simply monitoring travel patterns (Essex County Council)
- High density or taller buildings should be equipped to re-use rainwater to fulfil community's water demand (Essex County Council)
- Growth within the Key Service Settlements and Service Settlements should be at a level that helps to secure the delivery of viable and sustainable infrastructure. Where there are groups of smaller settlements, development in one village may support services in a village nearby (Essex County Council)
- A whole life carbon assessment could help inform the optimal spatial distribution of growth for Chelmsford, including whether a combination of approaches would be more suitable to achieve positive benefits towards a net zero carbon society (Anglian Water Services)
- If the level of additional growth proposed to 2041 in the new plan and existing planned growth in the adopted Local Plan leads to a higher population this would have implications for the medium and long-term strategy. Dependent on the spatial approach taken, there could be implications for growth at South Woodham Ferrers and Great Leighs Water Recycling Catchments (Anglian Water Services)
- Capacity for growth whilst maintaining an area's historic environment should be a key consideration, so that the quality and character of neighbourhoods, towns and villages is conserved. The density, scale, character and detailed

designed of new housing be appropriate for its context. The historic environment is a critical factor in this analysis in terms of considering the ability of sites and locations to accommodate new housing without undue harm to heritage assets and their settings – both for new sites and expanding existing allocations (Historic England)

- The Chelmsford North East bypass is only planned to be a single carriageway road and therefore there is doubt over whether it would be able to cope with increased traffic capacity (Little Waltham Parish Council)
- Consideration should be given to the capacity of roads and the modelling of junctions and roundabouts to mitigate the impact upon neighbouring areas (Great Notley Parish Council)
- Consideration should be given to the impact upon school and health facilities locally so that existing schools and GP surgeries are not overwhelmed (Great Notley Parish Council)
- Strong support for locating development outside of Green Belt locations. Proposals for development to the south of the city in locations including South Woodham Ferrers and Rettendon Common could impact on the need for infrastructure within Basildon Borough - joint working between the Local Planning Authorities is envisaged (Basildon Borough Council)
- Growth should be of a scale which is capable of delivering the necessary service and infrastructure. Pepper potting of development should be avoided as this would not provide the necessary quantum of growth to do that (Braintree District Council)
- The tables listed under each Approach for North East Chelmsford Garden Community indicates the number of indicative new homes, as well as the 3,000 within the adopted Local Plan. This adopted plan number is not shown for the allocated sites at South Woodham Ferrers or West Chelmsford and East Chelmsford – this would have been useful for consistency (Maldon District Council)
- Would welcome further clarification of the long term expansion and timetable proposed for North East Chelmsford Garden Community at Para 6.41 (Springfield Parish Council)
- We expect to work together to ensure that the growth options for both authorities integrate appropriately (Maldon District Council)
- Colchester City Council welcome continued discussion on strategic matters such as housing need, transport, infrastructure and Gypsy and Traveller accommodation through existing joint working arrangements and wish to continue to be engaged in discussion on strategic matters as part of the Local Plan process (Colchester City Council)
- Encourage CCC to promote a strategy that makes best use of previously developed land and areas with the best access to infrastructure, including both built facilities and the strategic road and sustainable transport networks. Important to ensure compatibility with Brentwood's own emerging Local Plan, and understand likely cross-boundary impacts (Brentwood Borough Council)
- Would like to see an assessment of the impact of the five different scenarios on carbon reduction energy/water usage. The route to net zero will largely be affected by traffic movements at the strategic scale but an assessment of the policy content and high-level infrastructure requirements arising from the spatial options at the more detailed development level would be instrumental (Uttlesford District Council)

- The strongly preferred option of development is along the A12 rather than anywhere in South Woodham Ferrers (Stow Maries Parish Council)
- Concerned about the impact on Boreham and other local villages. Boreham should remain a village separated from Chelmsford by green space, and its character protected. Recent development has resulted on the Primary School and GP Surgery reaching capacity. Village roads are very congested with local and passing traffic. Boreham and the surrounding road network cannot support any additional significant housing development (Boreham Parish Council)
- Broadly support growth in urban areas on the basis that they provide easy access to a range of facilities, from stations to small shops (Broomfield Parish Council)
- Concerned that the Local Plan does not afford the Chelmer River and Valley the same protections and status as other local rivers even though the length of the Chelmer Blackwater Navigation is a conservation area (Boreham Parish Council)
- The more logical option to make provision for local needs in such settlements as Rettendon Common and others in this category will be to carefully consider modest expansion of each village envelope to allow organic growth of developments of 5-10 units - rather than the imposition of a huge 1,500 or even 500 homes. Also, Rettendon Place and Rettendon Common has already and is continuing to benefit from the St Lukes development in Runwell for affordable housing (Rettendon Parish Council)
- There may be some merit in adding small numbers of houses to some existing larger villages to support community facilities and services such as village schools, but this needs the support of those communities (Chignal Parish Council)
- Support the focus on growth in urban areas and the expansion of allocated sites, but have a preference for avoiding developments in villages. Support the process of identifying different Spatial Approaches, but not all of the proposed Approaches (Great Waltham Parish Council)
- It is of concern that four of the suggested approaches include expansion of existing allocated sites. It is hoped this is not indicative of a 'business as usual' approach given the urgent need to re-balance transport in a more sustainable direction (Broomfield Parish Council)
- Encourage a strategy that makes the best use of previously developed land and areas with the best access to built facilities and the strategic road and sustainable transport networks. Acknowledge the advantages of planning at scale, and broadly support expanding Chelmsford Garden Community. Support further engagement as the review progress to ensure broad compatibility with Rochford District Council's emerging Local Plan strategy, in particular impacts on shared infrastructure such as transport corridors (Rochford District Council).

Summary of General Consultees Comments:

### **Approaches A to D**

- A to C - great care should be taken to ensure that any physical or visual intrusion into the Chelmer valley is avoided (Chelmer Valley Landscape Group)

- D - this seems to be the best option, as it appears that development would avoid the valley (Chelmer Valley Landscape Group).

### **Approach E**

- Would have a severe adverse impact on the Chelmer Valley, introducing urban development would be a major physical and visual intrusion; it would greatly increase traffic in the valley and increase visitor pressure at hotspots; the Chelmer Valley is one of Chelmsford's key environmental and cultural assets (Chelmer Valley Landscape Group)
- The A414 is already at full capacity, particularly at Danbury, and with increased traffic from developments south of Maldon and the proposed route for construction traffic from the proposed nuclear power station at Bradwell, the situation will become quite untenable (Little Baddow Society)
- The Chelmer Valley is unique both for its natural landscape beauty and its profusion of wildlife (Little Baddow Society)
- The popularity of the Chelmer Blackwater Navigation for swimming, water sports and informal recreation displays a social need for the benefits of the natural environment (Little Baddow Society)
- The worst of the approaches, which would have a significant effect on Boreham sandwiching it between major development of Beaulieu Park, Chelmsford Garden Community and Hammonds Farm Development and would ruin Boreham Village and its setting above the Chelmer Valley Conservation Area (Boreham Conservation Society)
- The Bradwell B project has identified land near J18 of the A12 as a potential park and ride facility (one of 6 search areas) which would reduce traffic impact on Danbury. Although detailed preparation has paused, we request to be kept up to date on any development proposals (Bradwell Power Generation Company Ltd).

### **Growth in urban areas**

- Strongly support, as they benefit from a good range of existing facilities, including sustainable transport hubs. There is also an opportunity to re-allocate land use and ensure that urban areas remain attractive and vibrant (North West Parishes Group).

### **Expanding allocated sites**

- Strongly oppose as larger allocated sites (West Chelmsford and north of Broomfield) were rejected for good reasons. They are further away from the city centre, leading to longer, less sustainable journeys, and overall, they are not supported by sustainable transport infrastructure (North West Parishes Group)
- Broadly oppose. The capacity of allocated sites was determined through a rigorous process, including independent examination, so they should only be expanded where fresh study demonstrates there are clear benefits for service provision and that constraints (such as roads) allow. We oppose the further expansion of the West Chelmsford and 'north of Broomfield' allocated sites (Broomfield Parish Council).

### **Growth along transport corridors**

- Strongly support to limit carbon and realise the new Vision (North West Parishes Group)

- Strongly support, especially where these include sustainable transport such as rail (Broomfield Parish Council).

### **Development at larger and smaller villages**

- Support an approach where each village is audited, in collaboration with the local community, to identify feasible growth opportunities; and oppose an approach that villages of whatever size should automatically expand. Opposed to the notion that Key Service Settlements should automatically expand, which has had limited success in the adopted Local Plan (North West Parishes Group)
- The size of the village is irrelevant, but whether it would be sustainable. Strongly oppose the idea that larger villages should be expanded simply because they are larger (Broomfield Parish Council).

### **Large new settlement/garden community**

- Strongly support if it is located close to existing/planned transport corridors (North West Parishes Group, Broomfield Parish Council)
- It is important for this one to start before 2041, even if the majority of housing is achieved in the following review period (North West Parishes Group)
- Strongly support the concept of Hammonds Farm, due to the advantages of a garden community, location close to the new Beaulieu rail station and the A12 and A130 (Broomfield Parish Council).

### **Other comments**

- The selected approach should aim to minimise physical or visual intrusion into the valley landscape; minimise additional traffic into and through the valley; preserve the character of views from north, south and along the valley (Chelmer Valley Landscape Group)
- Boreham needs recognition of its special character and value and new developments should be sustainable and where possible be on brownfield sites or low grade farmland; if numbers were limited to that which can be accommodated within the Village envelope, then this may be workable (Boreham Conservation Society)
- Green Belt land to the south and south-west of Chelmsford should be considered (Newlands Spring Residents Association).

Summary of Developer/Landowner/Agent Comments:

### **Approach A and mixed approaches**

- A to C – strongly supported. Extending the West Chelmsford allocation can evolve long term and deliver the same benefits that north-east Chelmsford is delivering (Taylor Wimpey)
- A to C – strongly supported as sustainable options to utilise, support and expand infrastructure; aligns with Strategic Priorities (Redrow Homes and Speakman Family); and to reinforce Chelmsford's role as the main centre; to provide significant benefits through access to services; would reinforce the role of the Green Wedge; would realise best in class transport network (Dandara)
- A to C – strongly support, it has been identified that delivery of over 6,000 homes will be possible at Chelmsford Garden Community within the adopted

allocated land, allowing CCC to maximise the delivery of homes on allocated land and reduce the need for further development on greenfield land elsewhere (Chelmsford Garden Community Consortium, Countryside Partnerships)

- A and C preferred as they would balance growth in terms of locations and scale (Wates Developments Ltd)
- A and C – strong support for their ability to relieve pressure on urban areas. Evidence should be provided for two different figures shown (Stonebond (Chelmsford) Ltd, Bloor Homes (Eastern))
- A and C – broadly supported, to deliver a balanced Spatial Strategy with an appropriate scale of allocations in sustainable settlements (Graham Dines)
- A and C – Great leighs could accommodate the higher figure of 1,500 homes due to sustainability improvements from allocated sites coming forwards (Bellway Homes Ltd)
- A and C – could also explore sites in the Green Wedge as part of a robust review (Miscoe Enterprises Ltd, Cliffords Group and Mr Mark Peters)
- A, C, D and E – these should be consistent with Approach B i.e. 2,500 dwellings in all scenarios (Essex Police, Fire and Crime Commissioner)
- Approaches A and B would each build on and strengthen the existing adopted Spatial Strategy, whilst Approaches C, D and E would, to differing degrees, weaken elements of that existing strategy (Ptarmigan Chelmsford A Limited)
- Welcome a flexible approach recognising that there are several ways to accommodate growth, and therefore support seeking to distribute growth to several different potential locations (A.G. & P.W.H Speakman).

### **Approach B**

- Cannot support as it does not reflect the opportunity for the Local Plan to deliver sustainable development at the edge of urban area locations. Development requirements and the limited number of available brownfield sites will mean that greenfield land adjacent to the urban areas will be required to accommodate growth (Martin Grant Homes)
- Support for the focus on previously developed land within the urban area of Chelmsford, and the benefits of development in sustainable locations (Essex Police, Fire and Crime Commissioner)
- The best approach, but the figure quoted could be exceeded over a 19 year plan period; it provides the greatest annual growth in the city centre; and could support retail, cultural and leisure growth and public realm improvements (Dominvs)
- Unrealistic, and may lead to high density and apartments, which may not meet identified needs (Richborough Estates)
- Makes the most of the good levels of sustainable accessibility in these locations and therefore ranks a clear first in the comparison of Spatial Approaches. The principal of development to the south-east of Chelmsford is therefore supported (Greystoke CB)
- Is solely reliant on Chelmsford and existing allocations being expanded and places a heavy reliance on Chelmsford Garden Community coming forward at a high rate of delivery. This does not lend itself to a balanced mix of sites, or a choice of locations for future residents in terms of scale or location (Wates Development Ltd).

### **Approach C**

- The most sustainable because it distributes housing across the area giving geographical diversity and a choice of housing types, with more certainty of early delivery (Inland Homes)
- The most suitable, although it neglects the Green Belt. Unlike the other approaches it does not result in heavy reliance on large sites; has shorter lead-in times; facilitates growth in smaller settlements and supports services (The Howgego Trust)
- Supported as it will support objectives for urban growth and renewal as well as ensuring the continued vitality of rural communities and settlements (Chris Buckenham)

### **Approach D**

- Do not support the notion of strategic scale growth being directed away from the city at the expense of more sustainable options; it would enhance the viability and vitality of well-connected existing villages, but this should be part of a balanced spatial strategy (Dandara)
- Should include growth along the A12 within the transport corridors (Bolton, S&D), including for employment allocations (Gray & Sons)
- Broomfield should be allocated a greater number than other Key Service Settlements which are less sustainable (Persimmon Homes)
- Support, but CCC has underpromoted the true potential and scope for sustainable strategic growth of new housing, jobs and infrastructure close to existing and planned strategic infrastructure and the broader strategic road network. Inclusion of Chatham Green supported due to its ability to accommodate a significant scale of growth, and deliver social and physical infrastructure for new and existing communities (Alexander Micklem)
- Strongly support, because the additional allocation for Chelmsford Garden Community would allow for a shift in urban design over time, which could allow for more dense forms of development (Chelmsford Garden Community Consortium, Countryside Partnerships)
- Support; the potential capacities for East and West Chelmsford have been reduced but there is more scope here to provide a greater number of homes in already established locations that would not compromise designated landscapes or ecological areas (Redrow Homes and Speakman Family)
- Question why Great Leighs is not included in this approach (Tritton Farming Partnership)
- This approach, and specifically allocating growth to Chatham Green, will allow the opportunity to benefit from planned infrastructure improvements already approved. This ensures that growth can be delivered at an early stage in the plan period. This should complement other aspects of the spatial option, including larger scale urban extensions and smaller, brownfield developments, which are recognised as sometimes taking longer to develop (Strutt and Parker (Farms) Limited)
- No evidence to suggest that the required level of infrastructure, services and amenities proposed as part of the existing North East Chelmsford Garden Community allocation would be able to accommodate such a large increase in the number of houses; it also fails to meet the housing needs of larger villages (Richborough Estates)



- The Chelmsford North East Bypass should also be included as a transport corridor (Cliffords Group Ltd)
- Provides access to London and other areas of Essex, but it should instead focus on local employment opportunities (The Bucknell Family, Pigeon (Sandon) Ltd)
- Has the potential to provide a more balanced approach to growth across the Chelmsford area than options B or E but is still significantly less balanced and flexible than options A or C since growth outside of urban areas or allocated sites would be restricted to growth along transport corridors. Such an approach would be at strong risk from any delays to the delivery of planned new strategic transport infrastructure (Wates Developments Limited).

### **Approach E**

- Would cause significant harmful environmental impact compared with some modest changes to the Green Belt on the edge of Chelmsford in sustainable locations (Rosehart Properties)
- Cannot be supported as it does not reflect a balanced Spatial Approach. Housing growth is needed on a variety of scales and in different locations to support the vitality of local services and provide housing choice for residents (Martin Grant Homes)
- Such major allocations can be subject to delays and viability issues, which could place the future housing land supply of the Council at risk and fail to meet housing needs (Martin Grant Homes, Richborough Estates)
- The least sustainable and the least aligned to the Vision and Strategic Priorities; less likely to encourage sustainable transport; and would create unnecessary over-reliance on one approach (Dandara)
- Scores poorly in the SHELAA assessment, and so is not suitable (Persimmon Homes)
- Not supported as the potential further allocation of only 3,000 homes at Chelmsford Garden Community would not optimise the housing delivery on site (Countryside Partnerships).

### **Growth in urban areas**

- Important to ensure that sites allocated on brownfield land are viable and deliverable; the supply of suitable brownfield land is limited and certainty of delivery is needed; density should be appropriate to location; parking standards be realistic; policy requirements should not make sites unviable (Gleeson Land)
- Strongly support as the main focus for major residential development should be in and around the city (Vistry Group)
- Supported, although brownfield sites are likely to deliver smaller accommodation units rather than family houses (Bellway Strategic)
- An opportunity for modest growth which would reduce reliance on private vehicles and be supported by infrastructure, to enable the delivery of growth over short timescales and on low risk, viable sites (Sempra Homes Ltd, Mr A Smith).

### **Expanding allocated sites**

- Needs to ensure there are sufficient services and facilities to support additional homes, or has a sensible size already been reached (Gleeson Land)
- Strongly oppose because of placing reliance on a small number of large allocations, with long lead in times and delivery challenges e.g. North East Chelmsford where mineral extraction, land restoration and development would need to take place before any further allocation can be delivered (Croudace Homes)
- Oppose because there is a lack of evidence to demonstrate it would be suitable and deliverable within the plan period without adversely affecting the communities already planned (Vistry Group)
- Does not necessarily mean additional land take, as there may be opportunities (such as at South Woodham Ferrers) to optimise dwelling delivery within existing allocation boundaries; Countryside have successfully achieved this at other strategic allocations without any adverse impact on design quality or the original design vision for the new communities, minimising the loss of greenfield sites, and maximising the benefits of investment in infrastructure (Countryside Partnerships)
- Supported to help ensure that important infrastructure is delivered, and to provide new homes in sustainable locations and reduce pressure for growth to other larger and smaller villages which may be disproportionate to their existing scale and facilities (Marden Homes Ltd).

#### **Growth along transport corridors**

- Support, although Rettendon Place should be identified rather than Rettendon Common (Croudace Homes).

#### **Development at larger villages**

- Greenfield sites on the edge of settlements can deliver sustainable development with an attractive environment; provide a range of new homes people want to live in, with easy access to local services and facilities, as well as open space for recreation and mental wellbeing (Gleeson Land)
- Strongly support as they are capable of accommodating additional residential development commensurate with their role and status in the settlement hierarchy (Vistry Group, Bellway Strategic, Medical Services Danbury, A.G & P.W.H Speakman)
- An opportunity for modest growth which would ensure continued support of existing services and facilities whilst not incurring wholesale infrastructure requirements, to enable the delivery of growth over short timescales and on low risk, viable sites (Marden Homes Ltd).

#### **Development at smaller villages**

- May be appropriate if they are of a scale commensurate with the existing size of the village to ensure new development can be properly integrated (Gleeson Land, Richborough Estates)
- Strongly support to reinforce and enhance the vitality and sustainability of smaller villages (Chris Buckenham, Croudace Homes, Cliffords Group Ltd, C J H Framing Ltd) and reduce the need to travel to other centres (Croudace Homes)

- A very modest amount of additional housing provision might be appropriate in order to meet local needs, but not a substantive level (Vistry Group, Bellway Strategic)
- Should not be limited to settlements with defined settlement boundaries, but also smaller settlements and hamlets to complement other approaches (Mr & Mrs Richard and Sally Speakman).

### **Large new settlement/garden community**

- Strongly support due to the benefits of housing and employment delivery in comparison to alternative approaches. Potential to deliver 4,000 homes in plan period and 1,500 later, with an opportunity for significant investment in infrastructure including sustainable low carbon transport (Grosvenor Property UK and Hammonds Estates LLP)
- Welcome the consideration of a large new settlement at Hammonds Farm and that the preferred approach is likely to be a combination of the most sustainable and deliverable elements of each of the five Spatial Approaches. Hammonds Farm has the potential for delivery under a number of scenarios, and is complementary with the Chelmsford Garden Community, with the ability for the two settlements to utilise shared infrastructure (Grosvenor Property UK and Hammonds Estates LLP)
- Needs to be carefully considered; new Garden Communities are often very complex and prone to delays; a high degree of certainty for delivery would be needed (Gleeson Land)
- Strongly oppose because it is the worst performing approach according to ECC's Sustainable Accessibility Mapping & Appraisal: Technical Note (July 2022) and would not enhance the sustainability of any of the existing settlements in the local authority area (Croudace Homes)
- Strongly oppose due to not being able to deliver in the plan period, risks having only one strategy, and result in homes being delivered away from where they are needed most (Vistry Group, Bellway Strategic)
- As half of the indicative number of new homes would need to be provided on one site it places a heavy reliance on it coming forward at a high rate of delivery. This does not lend itself to a balanced mix of sites, or a choice of locations for future residents in terms of scale or location (Wates Developments Limited).

### **Other comments**

- Agrees that exceptional circumstances do not exist at this stage for the review of Green Belt boundaries (Richborough Estates)
- The Council is wrong to dismiss the Green Belt and preclude it from the Spatial Approaches; Green Belt sites can deliver much needed housing in sustainable locations (Charterhouse Property Group & Charterhouse Strategic Land, The Howgego Trust)
- By prematurely ruling out Green Belt release, the Council are missing out on key opportunities to deliver sustainable development on the edge of Chelmsford urban area. The Local Plan Review process should provide evidence as to why suitable sites, as assessed and highlighted by the SHELAA, are not capable of release from the Green Belt (Martin Grant Homes)

- The absence of an alternative strategy to review the Green Belt – in association with a hybrid of the other spatial options being proposed - is not justified because there is no up to date evidence which demonstrates that “exceptional circumstances” requiring a review of the green boundaries will not exist during the plan extended period (Taylor Wimpey Strategic Land)
- The Council should provide evidence to support their rationale for how it has distributed growth between the Approaches (Martin Grant Homes)
- A robust spatial strategy would direct growth to all of these different types of locations to ensure that a range of development needs are met, and a robust and delivery housing trajectory is put in place for the Plan period (Strutt and Parker Farms Ltd)
- No objection to any of the five Approaches. Agree that a balanced and robust spatial delivery should steer varying proportions of growth to these locations to ensure the spatial strategy fully captures and delivers the development needs of specific groups throughout the plan period (Chris Buckenham)
- Strongly support additional development in the Key Service Settlements including Broomfield, which is a highly sustainable location given its major employment, health and education facilities and services, and sustainable links to Chelmsford (Obsidian Strategic Asset Management Ltd)
- Some appropriate provision for growth should be made in villages. Welcome the references to the NPPF instruction that a minimum of 10% of the housing requirement should be found via sites no larger than one hectare as this should assist in ensuring additional new housing provision in villages. The text in paragraph 6.30 should refer to "a minimum of 10% (Edward Gittins Associates)
- Should recognise the A12 as a potential location for further sustainable growth in Chelmsford, particularly in connection with A12 widening (Bolton, S&D)
- Housing delivery should be focused in areas with good existing or emerging transport connections and access infrastructure which will help support the delivery of sustainable development - in particular we encourage exploring growth along existing transport corridors and existing urban areas (L&Q)
- South Woodham Ferrers, in the top tier of the settlement hierarchy, benefits from a significant range of services and facilities. So, it should be accommodating a significant proportion of additional development. New settlements can provide housing for periods beyond the Local Plan, but if the Council were to focus on a new settlement, the growth of existing settlements would be stagnant. These major allocations should be supplemented with a combination of large, medium and smaller allocations in a balanced spatial strategy (Dandara Eastern)
- Strongly support the potential further allocation of land at the Chelmsford Garden Community as part of the review, where the additional housing capacity will bring increased certainty regarding the delivery and future funding of ongoing infrastructure requirements. However, the current allocations should be carried forward without change (Ptarmigan Chelmsford A Limited)
- Any new settlement, such as at Hammonds Farm, will take many years to reach any sort of critical mass whereby meaningful infrastructure contributions can be made, and potentially will be well beyond the Plan period (Ptarmigan Chelmsford A Limited)

- The Local Plan Review will be expected to address city-wide health infrastructure capacity in line with CCC's identified development needs of circa 8,000 new homes in the next plan period, regardless of the spatial approach selected (Grosvenor Property UK and Hammonds Estates LLP)
- Additional planning flexibility in the Writtle University Campus area will provide the ability for WUC to respond to the changing needs and opportunities in the locality. We propose taking WUC SPA out of the Green Belt, or to identify WUC as a major developed site where Green Belt policy does not apply (Writtle University College)
- An additional location for smaller rural communities that have access to public transport to nearby settlements and services can accommodate modest levels of housing should be considered as a spatial option (H R Philpot & Sons)
- Should carefully consider whether an additional 2,500 dwellings is capable of being delivered within the proposed Plan period within Chelmsford Garden Community; it should also be required to provide key infrastructure in the early phases to prevent unsustainable trips to services and facilities (Vistry Group)
- Disagree that all the Spatial Approaches will have broadly similar effects as we do not believe those that would result in the need for a greater level of travel are as sustainable as options that involve a concentration of development as close by to the city as possible (Vistry Group)
- Housing numbers for site allocations are termed as 'around' a housing number to allow for an appropriate degree of flexibility in provision. The proposed clarification of this in the updated Plan is supported as it provides the ability for site allocations to best meet the needs of the community as well as CCC's housing supply (Redrow Homes & Speakman Family)
- It is difficult to see how the proposed Spatial Approaches can be fully assessed against the economic IIA objectives when employment need, distribution and site allocations are still to be determined within the draft spatial strategy. Employment needs and economic growth should be considered as early as possible in the plan-making process to ensure it is aligned with the assessment of how other types of growth will be delivered as part of a well-balanced spatial strategy (Pigeon (Sandon) Ltd)
- Ahead of the publication of the updated employment needs study CCC should have close regard to the PPG in determining the specific locational requirements of specialist or new sectors including the logistics industry markets likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour (Pigeon (Sandon) Ltd).

#### Summary of Public Comments:

#### **Approach A, B and mixed approaches**

- A - Support with enhancements to services, to reduce sprawl with less condensed, greener, detached housing
- A and B - a combination of these would appear to be the most logical development areas and would be more cost effective than a proposal for developing a completely new settlement
- A and B - should be a higher strategic allocation with supporting policy to allow Danbury and other Key Service villages to take a greater portion of the housing and employment growth than envisaged in these approaches

- A and C – the separation and green gap between Boreham and Chelmsford is essential to keep Boreham a rural village; Boreham doctors and school are already at capacity
- A and C - rather than building houses on arable land more bias should be applied to development of brownfield sites within towns. We should preserve as much arable land as possible
- A and C - Boreham will suffer many adverse effects from the A12 widening, including from traffic from Hatfield Peverel. CCC expressed significant concerns about these impacts upon Boreham which seems at odds with proposals for extra houses and therefore traffic for Boreham; Waltham Road/Main Road junction is predicted to be above capacity with no improvement proposed; Plantation Road/Church Road/Hammonds Road is regularly used as a by-pass for the A12 which is congested on a daily basis
- A to D – object due to the impact on protected lanes, traffic problems, and the impact that building in Maldon has already had on services
- B - appears to be the better of the alternatives
- B - maximising development in the town centre is good but tends to limit housing provided to singles, couples or very small families. It still should continue on a compatible low rise level
- C to E - expansion of Danbury and other key service villages should be included. These villages have the capacity to accept more development due to the fringes of these settlements not being of high landscape value; development will support existing services and facilities of the villages and provide further community assets.

#### **Approach D**

- Support, especially at intersections like the new Chatham Green roundabout as it will provide better transport links for the area and create an obvious place for development
- Strongly support, as there is already infrastructure in place and an opportunity to improve services for existing residents
- Can augment existing settlements with good access to road and other infrastructure, and without the destructive effect on the countryside that would be caused by Approach E
- May just produce a modern form of ribbon development.

#### **Approach E**

- Petition of 2202 signatures stating a strong objection to Approach E; and proposing integration of Approach B and Approach D. Concerns include a lack of transport infrastructure, areas of flood plain, impact on GP and hospital facilities, a previous proposal was not supported by the 'Plan Evidence Base' including the 'Landscape Sensitivity and Capacity Assessment Preferred Option'
- The best proposal with the least disruption to residents, providing a new town (effectively) at Hammonds Farm. Little or no new infrastructure would be required except for the Hammonds Farm area
- Support due to better infrastructure in these locations
- Support, if development is done sensitively within the surroundings of the river and woodland this could be a beautiful location for wildlife and residents

- Support for new sustainable developments for people without changing the fabric of the local villages or asking the services in local villages to cope with more demands
- Limiting to around 1,800 dwellings, rather than the 4,000 proposed, will still be viable and provide all the independent services to support this population. E.g. Great Notley Garden Village of 1,800 dwellings provided shops, services, a country park, formal and informal play space, a dual carriageway and strategic landscaping
- Strong objection as a proposal to develop Hammonds Farm was rejected by CCC in 2017 because it was not supported by the 'Landscape Sensitivity and Capacity Assessment' – the landscape has not changed in the last 5 years
- The most significant negative environmental impact compared to all the other options. This option should be discarded on legal, environmental and commercial grounds
- Concern about availability of schools/nurseries, doctors and dentists, impact of additional residents' needs on Broomfield Hospital, services for people with special needs, policing, access to shops
- Concern about the impact on the A414. A12 especially junction 18 & 19, A130, congestion on minor roads in the area and rat-running, combined with additional traffic from developments in Maldon & Heybridge, unsustainable peak traffic pressure, traffic in Boreham, river bridge towards Boreham
- There is the yet unknown impact on Chelmsford roads and traffic from wider proposals such as new Thames crossing, potential power station at Bradwell
- There are no proposals to widen this section of the A12; and closing the Hatfield Peverel A12 junctions will cause more traffic in Boreham
- Would increase use of Chelmsford railway station; access to new railway station would be via the already congested A12
- The location is unsuitable for cycling routes to Danbury or Chelmsford and the alternative of buses would need massive long-term support if it is to become a trusted alternative; current cycle routes are on very busy roads and are unsuitable as a real alternative to car use (to Danbury and Chelmsford)
- Would put pressure in the Park and Ride service
- The intrusion on nature is much more than 4,000 houses; there is the need to build all the infrastructure for site from scratch, the desire to create the space for 4,000+ jobs, the need to enhance all the communication links to the site
- Concern that 4,000 houses will become 8,000 or even 12,000
- Concern about making Little Baddow and Danbury into suburbs of Chelmsford
- Concern about sewage treatment capacity
- Should not consider building on the flood plain or water meadow, particularly with the current climate issues; flood risk is already a problem with roads often flooding and having to be closed, this would make things worse; development should be on areas of lower flood risk first
- Currently the area offers access to the river, lakes, walking and cycling, and beauty spots which serve the broader community; it was a sanctuary during lockdown; it's a natural environment for the city's inhabitants; it provides an important resource for mental health and well-being; the Chelmer Valley deserves the same recognition as the Stour Valley
- Concern about the impact on the village character of Little Baddow and Danbury; there will be housing estates from Chelmsford to Heybridge with not a field in sight in a few years; the villages and their character will be gone

- The A12 forms a natural boundary which should contain development and prevent sprawl
- The views of Danbury Ridge would be adversely affected, as would views out from the War Memorial
- Heritage impact on the Chelmer Valley; impact on Great Graces and Graces Walk, Boreham Hall, St Clere's Hall, Danbury Palace
- Wildlife impacts including wildlife sites and ancient woodland, largely untouched in the past; wildlife will not survive; numerous wildlife species are recorded here including rare breeds; ECC gave an environmental award for wildlife survey work of this area, so it seems illogical to consider development
- Trying to restore this damage through biodiversity offset does not match the loss of precious habitat, and ignores the timing difference between immediate increase in carbon release through the development work and the many years absorption of carbon through the offset planting
- Loss of productive prime agricultural farmland which is highly productive
- Appears to be at odds with many of the Spatial Principles (particularly a, e, f, g, h, i)
- Garden communities are really new dormitories and are the worst for sustainability
- A number of Garden Community planning applications have been rejected recently as unsustainable
- There is a big difference between North-East Chelmsford which is not of spectacular beauty and Approach E which is on land which has beauty and attracts people from all over the county for views, walks, peace and tranquillity
- The assumption that garden communities will generate sufficient new jobs is misguided, jobs and services should precede residential development. Businesses may relocate but they will take their staff with them; new residents will already have jobs elsewhere
- The Garden Community approach is good as it may allow existing communities to keep some necessary local green space.

### **Other comments**

- Support growth in urban areas, particularly South Woodham Ferrers. There is better access to main road networks, and would create greater spending power for new businesses and leisure facilities
- The major employers (Stansted, Broomfield Hospital, University) and new station and bypass are on the north side of the A12, so houses should be built north of Boreham to reduce traffic crossing and rat-running
- The Consultation does not seem to consider the impact on neighbouring areas or consider the impact of planning decisions in neighbouring districts. All the developments in Maldon have created a demand for services that Maldon cannot meet, e.g. medical facilities designed for Danbury and Little Baddow are now swamped with those who live in Maldon; increased traffic from Maldon on the A414 and the lanes
- It looks like most of the new development is in the East of the borough; I believe that developments could also be sustained in the West and possibly also Galleywood
- There is a need for small units for downsizing, and also to enable young local people to get a foothold in a village where they have grown up. Large



imposing mansions/houses should be prohibited in both large and small villages

- Support brownfield development; empty offices and retail units should be converted to new housing with priority for those near public open space, transport and cycle routes; empty commercial units further away could be refurbished for business use; and proper facilities for young people are needed
- Further allocation of housing to Danbury would not be sustainable; the Neighbourhood Plan is allocating sites for around 100 houses and has selected those with the least impact on the A414, rural/protected lanes, heritage and environmental assets, landscape; growth in Danbury and Little Baddow would also impact on traffic, local services, and recreational pressure on the SSSIs
- Concern about proposals at South Woodham Ferrers, due to traffic and pressure on services. Potential development in the Maldon district at Stow Maries and potential Bradwell power station will add to the pressure.
- Seems to be no clear reason why growth is desirable or necessary
- The maps give no detail on which fields and footpaths are threatened by development
- The Plan should concentrate on improving the city by promoting an environmentally friendly city
- Should refurbish empty homes for occupation, rather than build new ones
- New housing should be close as possible to the new railway station, the A12 and the centre of Chelmsford. People are more likely to walk and cycle if journey distances are shorter.

### **Our evidence says**

The Strategic Housing Needs Assessment (SHNA) 2023 supports the housing requirement of 1,000 new homes per annum for the preferred Spatial Strategy.

Housing monitoring has shown that applying a supply buffer of around 20% will help provide flexibility in the supply of housing sites and ensure the housing requirement is met. This follows the approach used in the adopted Local Plan and the Core Strategy before that.

The Employment Land Review 2023 considers current economic trends and future requirements for new employment floorspace up to 2041. The Spatial Strategy proposes new employment sites totalling around 110,000sqm in addition to existing allocated employment sites in the adopted Local Plan.

The Retail Capacity Study Update 2023 finds that there is no need to allocate new sites for retailing and that there are no significant gaps in the provision of larger commercial leisure facilities in the area. In line with the study, no proposed new retail allocations are proposed in the Preferred Options Local Plan.

The Parish Audit 2024 is a technical assessment of key services, facilities, and bus provision available to residents within villages and parishes across the Council's area. It supports the Settlement Hierarchy in the preferred Spatial Strategy.

The Local Plan Viability Report 2023 provides a high-level viability of different typologies of development sites that could come forward through Local Plan allocations. The assessment supports the site allocations in the preferred Spatial Strategy.

## **Our evidence says**

The Strategic Housing and Economic Land Availability Assessment (SHELAA) 2023 assesses land promoted for new housing and employment development. This is supplemented by the Urban Capacity Study 2024. The sites identified in the preferred Spatial Strategy are promoted for development and supported by the SHELAA 2023 and Urban Capacity Study 2024.

Drawing on the wider plan evidence base, national planning policy and guidance and the Issues and Options consultation responses to the five Spatial Approaches, three Spatial Strategies were developed for detailed technical testing in 2023. The Transport Impact Appraisal of Spatial Approaches 2023 assesses the relative impact of additional development traffic on the future capacity of links and junction on the road network of the three Strategies. The Landscape Sensitivity and Capacity Study 2024, considers the landscape sensitivity and resulting capacity for the development proposed in the three Strategies. The Water Cycle Study Scoping Report 2024 provides a high-level assessment of the three Strategies on water infrastructure. The technical outputs from each study identify positives and negatives associated with each Strategy. The outputs have been used alongside other plan evidence and national policy, to inform the employment and housing site allocations included within the preferred Spatial Strategy which has been subject to further technical testing – see below.

The Water Cycle Study Reports 2024 indicate no major concerns with respect to water supply to cater for proposed level of new growth. Chelmsford Water Recycling Centre (WRC) catchment, where most development is being proposed for the plan period up to 2041, has significant spare capacity and can accommodate the proposed development including the East Chelmsford Garden Community, Bicknacre, East Hanningfield and the employment allocations. They also identify constraints to development growth in Chatham Green due to constraints at Great Leighs WRC. The studies support the preferred Spatial Strategy.

The Preferred Options IIA 2024 considers that the preferred Spatial Strategy, which is a hybrid of Approaches A to E, will focus new housing and employment growth to the most sustainable locations when considered against national planning policy, analysis of responses to the I&O, environmental constraints, discussions with key stakeholders, availability/viability of land, the settlement hierarchy, and draft Vision/Spatial Principles.

The Infrastructure Delivery Plan (IDP) 2023 supports the levels of growth and locations of growth over the plan period and considers that the required new infrastructure improvement and investment is feasible and deliverable. Overall, the IDP supports the preferred Spatial Strategy.

The Housing Sites Schedule April 2023 details allocated sites for housing and non-allocated sites which have come forward in the planning process. It supports the proposed new Local Plan housing allocations in the preferred Spatial Strategy.

## **The Preferred Options Local Plan**

The preferred Spatial Strategy has been developed using national policy, relevant policies and strategies, engagement with key stakeholders, feedback from the Issues and Options consultation, and the plan evidence base including testing of options through the IIA, traffic modelling and landscape capacity (as described above).

## The Preferred Options Local Plan

The preferred Spatial Strategy reflects the proposed updated Vision and Strategic Priorities of the plan including Strategic Priority 1 Addressing the Climate and Ecological Emergency

The preferred Spatial Strategy is an evolution of the five spatial approaches tested at Issues and Options stage, which overall received a mixed reception in the comments and three hybrid Spatial Strategies tested in 2023. It continues to focus new housing and employment growth to the most sustainable locations in three Growth Areas informed by the settlement hierarchy, site availability, environmental constraints, and factors of delivery. Growth will be accommodated on unbuilt allocated sites rolled forward from the adopted Local Plan and new proposed site allocations.

The amount of new development in the preferred Spatial Strategy is informed by updated evidence base and data, including the Strategic Housing Needs Assessment 2023, Employment Land Review 2023 and provisional findings of the Gypsy and Traveller and Travelling Showpeople Accommodation Assessment 2023 to 2041.

The Issues and Options consultation document suggested a need for around 8,000 additional new homes, over and above those allocated in the adopted plan. More recent monitoring data in the Housing Sites Schedule (April 2023) indicates that the residual requirement is around 4,860 dwellings, primarily due to an increase in sites with planning permission and increased capacities on adopted Local Plan allocations to 2036. This lower figure is used in the preferred Spatial Strategy.

Overall, the preferred Spatial Strategy meets development needs for new housing, employment and Travelling Showpeople in full, protects the Green Belt, and allocates new development in sustainable locations.

Unbuilt site allocations in the adopted Spatial Strategy have been rolled forward into the preferred Spatial Strategy as they continue to represent sustainable and sound development allocations.

It is not considered proportionate or necessary to undertake a carbon impact assessment in addition to the IIA (and there is also no requirement to undertake this). The Local Plan and the IIA are considered to be in accordance with guidance on carbon impact assessment.

Alternative Spatial Strategies and site allocations have been considered, tested in the evidence base, and rejected as they perform less well than the preferred Spatial Strategy and site allocations – see below.

Additional growth in Chelmsford Urban Area (Spatial Approaches A-E) was supported as a sustainable approach in the Issues and Options consultation responses. The preferred Spatial Strategy makes the best use of previously developed land in Chelmsford Urban Area by proposing new sites for housing and employment in line with the Urban Capacity Study 2024. However, it is not possible to accommodate all future growth needs on brownfield sites, so further greenfield sites are identified in the preferred Local Plan.

Spatial Approach D included housing growth in settlements with good proximity to transport corridors). This received some support in the Issues and Options consultation responses. A new Garden Community in East Chelmsford and strategic employment site at Junction 18 of the A12 form part of the preferred Spatial Strategy. These sites will have good access to the strategic road network and provide active and sustainable transport connections into Chelmsford Urban

## The Preferred Options Local Plan

Area and City Centre. Chatham Green has been discounted given its relative isolated location from the strategic highway network and new railway station. Howe Green has been discounted as a new primary school would need to be provided but no site of a suitable size is promoted. Rettendon Common has been discounted due to its distance from the wider transport network and existing services and facilities.

Spatial Approaches A and C included a large new settlement at Hammonds Farm. This was generally opposed in the Issues and Options consultation responses, although limited support was shown for a sensitive approach. A new Garden Community in East Chelmsford forms part of the preferred Spatial Strategy. The site allocation policy (SGS16a) will require the development to be a high-quality comprehensively planned landscape-led new sustainable Garden Community based on TCPA Garden City Principles that is supported by a wide range of services, facilities, and infrastructure including schools, employment, neighbourhood centres and a new Country Park. The site policy also requires development impacts are suitably mitigated. The site performs well in the IIA when considered against the evidence base, constraints and opportunities, and is supported by the plan evidence base including the 2024 Water Cycle Study Reports. Specific concerns identified in the consultation responses are addressed in the site policy requirements including landscape, traffic and heritage impacts.

Spatial Approaches A and C considered housing growth in Key Service Settlements and Service Settlements and received a mixed reaction in the consultation responses. The preferred Spatial Strategy proposes limited housing development in Bicknacre, East Hanningfield and Ford End. These villages have existing primary schools with capacity and community facilities making them suitable for limited new development. Development will also provide opportunities to contribute towards and enhance the existing facilities and services of the villages and help towards the national planning policy requirement to accommodate at least 10% of the housing requirement on sites no larger than one hectare. Growth in other Key Service Settlements and Service Settlements above that in the adopted Local Plan has been rejected as they are too constrained and unsuitable for further development growth. Reasons include a lack of known capacity in respect of highways and/or primary school provision, Green Wedge constraints and a lack of available sites promoted.

Spatial Approaches A-D included housing growth as extensions to the edge of Chelmsford and North of South Woodham Ferrers. This received a mixed reaction in the consultation responses. This approach has been rejected as the evidence base shows that these locations perform less well than the preferred Spatial Strategy and proposed site allocations. Reasons include a lack of known capacity in respect of highways and/or primary school provision.

Further expansion of Chelmsford Garden Community (Spatial Approaches A-E) has been discounted as it is not deliverable within the plan period given permitted mineral extraction and land remediation works.

The preferred Spatial Strategy includes a mix of different types and sizes of site allocations across a variety of locations that could come forward throughout the plan period.

The preferred options document details the supporting infrastructure which would be required to be delivered alongside the proposed new employment and housing allocation. This includes provision of appropriate school facilities and highways

<b>The Preferred Options Local Plan</b>
infrastructure. The Council will continue to engage with infrastructure providers to ensure appropriate infrastructure can and will be provided and planned for.
Policies in the plan including the site specific and development management policies contain requirements to ensure new development will be acceptable in highways and landscape terms.
In line with national planning policy, there are no 'exceptional circumstances' demonstrated to release Green Belt within the City Council Area. The preferred Spatial Strategy indicates that additional development requirements can be sustainably delivered at locations outside the Green Belt. Therefore, a review of the Green Belt is not appropriate or necessary.
Confirmation from Duty to Cooperate Bodies that they will continue to engage with the Council during the plan-making process is welcomed.
The Preferred Options Local Plan includes updated information on the delivery of the Chelmsford North East Bypass and new railway station.
Further information on the approach taken in distilling the options available including testing three Spatial Strategy options from the Issues and Options and the reasoning for the preferred Spatial Strategy, is set out in the Preferred Options Spatial Strategy and Strategic Sites Topic Paper.
The Green Wedge boundaries are appropriately defined around the main river valleys as set out in the Green Wedge evidence base reports.

#### Key Statistics:

<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
<b>63. Are there any Spatial Approaches that the Council has missed?</b>	N/A	N/A	44	44

Please note that many respondents used Question 62 to comment on the Spatial Approaches presented in the consultation document and any the Council may have missed. As such, the responses below should be read alongside those in Question 62.

#### Summary of Specific and DTC consultees comments:

- More development to the west of Chelmsford including challenging the Green Belt to the west/south-west of Chelmsford; protecting the green belt is pushing development to its borders (South Woodham Ferrers Town Council)
- A combination of approaches B, D and E - Hammonds Farm could be smaller, it uses rail infrastructure, A12 and A130 corridors, minimises car use, meets the new Vision and meets the climate and ecology emergency (North West Parishes Group, Broomfield Parish Council) and it complements the existing commuting patterns (Broomfield Parish Council)
- A combination of D and E would provide flexibility given that delivery at Hammonds Farm would extend beyond 2041 (Chignal Parish Council).

#### Summary of General Consultees Comments:

None.

#### Summary of Developer/Landowner/Agent Comments:

- Carry out a Green Belt review (Rosehart Properties Ltd, Pembridge Land Group, Taylor Wimpey Strategic Land, Barratt David Wilson)
- There is insufficient evidence to demonstrate that some alterations to Green Belt boundaries in the most sustainable locations, immediately adjacent to the existing defined Chelmsford Urban Area, should not be considered (Rosehart Properties Ltd, Pembridge Land Group)
- The historic and existing spatial strategies that did not review the Green Belt has led to a distorted settlement pattern for Chelmsford. This cannot continue with substantial growth to the north, north east and west without creating harmful impacts on other important sustainability considerations including transport and the environment (Pembridge Land Group, Rosehart Properties)
- Should consider growth in the Green Wedge along the A130, as part of a review of all spatial options (Hill Farm (Chelmsford) Ltd)
- CCC consider that the additional development requirements identified through the Local Plan review can be sustainably delivered outside the Green Belt, and that these areas also have significant infrastructure improvements planned as part of the adopted Local Plan. Therefore, CCC do not believe that there are exceptional circumstances which would warrant a departure from national planning policy. This is questioned as CCC has not published their updated Employment Needs Study hence the full employment needs are not fully understood, and the challenges associated with such delivering such growth (Gray & Sons)
- The Strategy fails to consider a spatial strategy which reviews the green belt boundaries where it would meet an identified community and housing need. The alternative options are not justified because the identified brownfield sites are assumed to all be available and deliverable or developable during the plan period, the proposed growth sites outside the Green Belt are assumed to be viable and the necessary infrastructure are assumed to be funded and completed during the plan period. In addition, the evidence base on the city's housing need and land supply has not been updated (Taylor Wimpey Strategic Land)
- There is no reference to the location of non-strategic employment areas. As part of the spatial approach, we expect to see consideration of and distribution of employment growth to rural areas beyond the Chelmsford Urban Area to help sustain and enhance the vitality of rural communities in line with para 84 of the NPPF (The Bucknell Family, Hill Farm (Chelmsford) Ltd)
- Do not support the approach. There is substantial development potential in the city centre that is not being recognised (Dominvs Group)
- Approach D but with Chatham Green as the only transport corridor proposal as it scores highly in sustainability terms (Mrs and Mrs Andrew Parker)

- Less additional growth at allocated sites and more across Service Settlements to enhance their sustainability, including Rettendon Place rather than Rettendon Common (Croudace Homes)
- Revisit the Settlement Hierarchy so Broomfield can be considered an urban area, and then allocated development in its own right as one of the most sustainable settlements (Obsidian Strategic Asset Management)
- The Council should recognise the A12 as a potential location for further sustainable growth in Chelmsford, as a transport corridor (Bolton, S&D)
- The Council could adopt a more diverse strategy, with site allocations in all sustainable settlements across the plan area to support existing services and facilities and maintain viability of communities (Dandara Eastern, Hill Residential Ltd)
- Should include a category for 'Chelmsford Urban Area and adjoining land' to recognise that there are highly sustainable and suitable greenfield sites within or immediately adjacent to the Chelmsford Urban Area (Martin Grant Homes, Mr J Bolingbroke)
- There should be a balance of growth across the settlement hierarchy with a focus on growth in areas well connected to new transport infrastructure. Boreham should be considered more favourably than the other Key Service Settlements of Danbury and Great Leighs due to its strategic location and access to the new rail station, employment space and Chelmsford North East Bypass. Boreham has seen limited growth or housing allocations compared with other settlements (Wates Developments Limited)
- Consider a site with cross-boundary potential to deliver a sustainable pattern of growth, of satellite villages along the A131 northbound all the way up to Braintree from Chatham Green, around Great Leighs, terminating at Great Notley before reaching Braintree Town Centre. This would maximise the potential for sustainable distribution of growth throughout the plan period (Mr Alexander Micklem).

#### Summary of Public Comments:

- To be more sustainable, that means increasing the concentration of housing, not spreading it ever more widely; focus on increasing the density in Chelmsford without spreading the urban footprint into the countryside
- A130 corridor is flat, potential for mitigation from road noise, not of high visual quality, so would be worth considering
- Development could be sustained in Galleywood
- All communities of 50+ residences should be provided with an allocation for 'natural' growth and down-sizing elderly who wish to remain in their community
- Due to constraints elsewhere, logically the developments should be West on the A414 (extension of the Writtle area) or East on the A414 in the Danbury or Little Baddow area. There are vast tracts of land in this area which is ripe for development. Suggest a top down approach where the parish councils are asked where the best locations would be.

### **Our evidence says**

Following the Issues and Options consultation three Spatial Strategies were developed for detailed technical testing in 2023. The Preferred Options Spatial Strategy has evolved from the outputs of the technical testing on the three Spatial Strategy options alongside other evidence, and national policy and has been subject to further technical testing.

The Preferred Options Local Plan is supported by a number of evidence base studies such as the Preferred Options Integrated Impact Assessment (IIA), Employment Land Review, Water Cycle Studies, Transport Assessments, Strategic Flood Risk Assessments and Landscape Sensitivity and Capacity Study 2024.

### **The Preferred Options Local Plan**

The consultation responses, call for site submissions, national planning policy, evidence base including the final development requirements inform the preferred Spatial Strategy.

The Preferred Options Spatial Strategy and Strategic Sites Topic Paper outlines the approach taken in distilling the options available including testing three Spatial Strategy options following the Issues and Options and the reasoning for the Spatial Strategy shown in Preferred Options Local Plan.

The Preferred Options Local Plan does not include sites in the Green Belt. National planning policy makes clear that Green Belt boundaries should only be altered in exceptional circumstances. The additional development requirements needed through the review of the adopted Local Plan can be sustainably delivered at locations outside the Green Belt. These locations also have significant infrastructure improvements planned as part of the adopted Local Plan. There are no exceptional circumstances which would warrant a departure from national planning policy.

The preferred Spatial Strategy proposes new employment sites totalling around 110,000sqm in addition to existing allocated employment sites in the adopted Local Plan.

Additional growth in Chelmsford Urban Area was supported as a sustainable approach in the Issues and Options consultation responses. Several additional housing and employment site allocations are included within the Preferred Spatial Strategy to meet additional needs to 2041.

See also tables under Q62.



## **Part 7 – Development Standards**

This section of the consultation document sets out standards that normally apply to all new residential development which seek to ensure that new development will meet the needs of their occupiers, minimise the impact of new developments on adjacent occupiers and encourage recycling.

Key statistics:

<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>	<b>Total number of responses</b>
<b>64. Do you support the approach being taken? If you disagree, please explain why?</b>	20	3	15	38
<b>65. Do you have any views on the Council's current development standards and the decisions they lead to?</b>	N/A	N/A	14	14
<b>66. Are any development standards missing, should anything be changed or do some standards require further clarification to aid interpretation? Where possible, please support your answer with reference to any evidence.</b>	N/A	N/A	17	17

Summary of Specific and DTC consultees comments:

- Welcome the additional design standards proposed and the attempt to reduce the carbon footprint of new housing. Building standards need to go further if we are to meet targets for net zero carbon by 2050. Request a greater commitment towards net biodiversity gain. In order to succeed, this will require specific targets with regular monitoring and reporting (Boreham Parish Council)
- Continue the following as part of the review of the Local Plan - use of community spaces as a hub for our Prevention teams to deliver Fire Safety and Education visits; adherence to the requirements of the Fire Safety Order and relevant building regulations, especially in relation to smoke alarms/sprinkler systems; implementation of vision zero principles where there are introductions of or changes to the road network; appropriate planning and mitigations to reduce risks around outdoor water sources; suitable principles in design to avoid deliberate fire setting (Essex County Fire and Rescue Service)
- In relation to access during and post construction the following should be considered - road widths to be accessible whilst not impeding emergency service vehicle response through safe access routes for fire appliances including room to manoeuvre (such as turning circles); implementation of a transport strategy to minimise the impact of construction and prevent an increase in the number of road traffic collisions; no negative impact on the

Service's ability to respond to an incident in the local area arising from the development; a risk reduction strategy to cover the construction and completion phases of the project and the implementation of a land management strategy (Essex County Fire and Rescue Service)

- Support the proposed approach (Great Waltham Parish Council, Essex County Council)
- Support the reference to the EDG in the standards (Essex County Council)
- Recommend that the proposed development standards are more closely aligned with the EDG and refer to a number of ECC documents relating to net zero development, solar farms, 5G and drainage (Essex County Council)
- The 'Essex Healthy Places Advice - Notes for planners, developers and designers' should be incorporated into the new Health Impact Assessment policy (Essex County Council)
- Current policy is inconsistent with the other policies in the document (Writtle Parish Council)
- Development standards could be more ambitious with integrated water management on larger sites. Improvements can be made particularly around water efficiency and reuse (Anglian Water Services Ltd)
- The Council's area is within an area designated by the Environment Agency as in serious water stress. As such, plan policies should require new homes to meet the optional tighter standard of 110 litres per person per day (Essex County Council).

#### Summary of General Consultees Comments:

- Support proposed approach (Newland Spring Residents Association).
- Current policy does not offer flexibility, as not all development will be able to meet the standards (CHP)
- Missed standards relating to net zero (CHP)
- The review of the Council's evidence base for community sport should be used to inform a review of the Council's current approach to securing provision for sports provision in new development (Sport England)
- The approach to provision should now be informed by needs assessments e.g. Playing Pitch Strategies and not generic quantity and access standards (Sports England).

#### Summary of Developer/Landowner/Agent Comments:

- Support the proposed approach (Bellway Strategic, Chelmsford Garden Community Consortium)
- Support the review of the development standards (Taylor Wimpey, Hill Residential Ltd, Dandara, Dandara Eastern)
- Should be viability tested (Vistry Group)
- Should avoid being overly prescriptive and could be contained within an SPD as they are a non-strategic policy (Bellway Strategic)
- Policy should be based upon existing provision and standards should not be proposed that are not yet commercially viable or proven to be technically feasible - particularly in relation to recycling and waste collection on strategic sites) (Chelmsford Garden Community Consortium)

- Missing changes to the private garden sizes. Lowering the amenity provision for three bed units in close proximity to the city centre would result in the better use of brownfield land, providing more new homes, of a size which is of greater demand and more affordable (Broadfield Homes Ltd).

Summary of Public Comments:

- Support the proposed development standards
- Private back gardens/personal open space is needed as more people are using them as play spaces or for growing food
- Concerned that gardens on new houses are now much smaller
- There is less opportunity to extend new dwellings
- Need to increase capacity for increase in refuse/recycling provision
- Should be more radical to respond to the climate emergency with solar panels, EV charging points and facilities to recycle grey water
- Houses should be carbon neutral
- Council should have an all-in-one recycling bin
- Ensure green buildings with well insulated homes
- Ensure mandatory EV charging points
- There is a missing requirement for solar panels and heat pumps along with other measures to increase self-sufficiency.

<b>Our evidence says</b>
The Essex Design Guide emphasises the importance of the design of private amenity spaces.
An updated Open Space, Sports and Recreational Facilities Study and Sports Facilities Strategy has been commissioned. It will provide up-to-date and robust evidence base on community sports facilities required to support the updated policies and will inform the final draft plan (the Pre-Submission Local Plan).
A key action in the Council’s Our Chelmsford Our Plan and the Council’s Climate and Ecological Emergency Declaration Action Plan is to significantly increase the amount of woodland and tree cover in Chelmsford.
Essex Net Zero Policy – Summary of Policy, Evidence and Validation Requirements sets out the requirements for Net Zero Carbon dwellings in Local Plans across Essex.

<b>The Preferred Options Local Plan</b>
Changes have been made to the privacy, private amenity space and natural light sections for clarity, to aid interpretation, to align with Essex Design Guide and to make reference to good practice guidance. Information on maisonettes has also been included.
Appendix B is focused on standards, so more detailed design advice for private amenity spaces will be more appropriately included in an updated Making Places SPD.
The open space section has been simplified to make it more effective with references to the Council’s Open Space Advice Note, the Planning Obligations SPD and the pending updated Open Space, Sports and Recreational Facilities Study and Sports Facilities Strategy.

## The Preferred Options Local Plan

A new tree planting section has been added to reflect the Council's corporate plan 'Our Chelmsford, Our Plan', the Council's Climate and Ecological Emergency Action Plan and to align with updated Policy DM17 (Trees, Woodland and Landscape Features).

The Waste and Recycling section is amended with updated key design standards and collection vehicle dimensions. A link to the Council's Recycling and Waste Collection Policy is also added. References to documents no longer in use have been removed.

The Development Standards do not deal with energy and water efficiency standards which falls under Policy DM25 (Sustainable Buildings). This policy includes updated requirements for water efficiency and rainwater harvesting, and access to electric vehicle charging infrastructure. Content relating to zero carbon development has been merged into Policy DM31 (Net Zero Carbon Development (In operation)). This is a new policy developed with Essex Planning Officers Association and Essex County Council, for new buildings to be designed and built to be net zero carbon in operation.

Issues such as access by fire & rescue services and use of community spaces as a hub for prevention teams to deliver Fire Safety and Education visit, are details to be considered at site masterplanning and planning application stages.

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

## **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 Adverts

City Life Articles

South Woodham Focus Article

Local Plan Poster

Examples of Social Media Posts

Local Plan Newsletter

## LIST OF ORGANISATIONS CONSULTED

The Council notified nearly 2,100 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	Berkeley Strategic	Chelmer Cycling Club
A Dunn & Son	Billericay Town Council	Chelmer Housing Partnership
Abbess, Beauchamp & Berners Roding Parish Council	Bishops Primary School	Chelmer Residents Forum
Abellio Greater Anglia	Black Notley Parish Council	Chelmer Valley High School
Accord Energy Limited	Blackmore, Hook End & Wyatts Green Parish Council	Chelmsford and District Model Railway Club
Active Workspace Ltd	Bloor Homes	Chelmsford Biodiversity Forum
Age UK Essex	BNP Paribas Real Estate UK	Chelmsford Business Board
Aggregate Industries UK Ltd	Boreham Conservation Society	Chelmsford Business Forum
Alan Wipperman & Co	Boreham Parish Council	Chelmsford City Centre Retailers Group
Aldi Stores	Boreham Primary School	Chelmsford City Football Club
Alun Design Consultancy	Bowler Energy LLP	Chelmsford Civic Society
Anchor Housing	Braintree District Council	Chelmsford College
Andrew Martin - Planning Limited	Brentwood and Chelmsford Green Party	Chelmsford Community Transport Limited
Angel Stores	Brentwood Borough Council	Chelmsford Commuters & Rail Travellers
Anglia Ruskin University	Bressole Limited	Chelmsford County High Schools for Girls
Anglian Water Services Ltd	British Toilet Association	Chelmsford CVS
Aquila Developments	Broomfield Neighbourhood Plan Steering Group	Chelmsford Cycle Action Group
Archerfield Homes	Broomfield Parish Council	Chelmsford Hindu Society
Arriva The Shires and Essex	Broomfield Primary School	Chelmsford Labour Party
Ashton KCJ	BT National Notice Handling Centre	Chelmsford Liberal Democrats
ASP	BT Openreach, Southend ATE	Chelmsford Liberal Party
Atkins Telecom	Building Research Establishment	Chelmsford Mencap
Avison Young	CAAG	Chelmsford NAG
Aviva	Campaign for Real Ale Limited	Chelmsford Rivers And Canal Link Group
b3 Architects llp	Campaign for the Protection of Rural Essex	Chelmsford Rugby Football Club
Baddow Hall Junior School	CAODS (Chelmsford Amateur Operatic & Dramatic Society)	Chelmsford Safety Supplies
Bakers Lane Action Group	Capita Property and Infrastructure	Chelmsford Social Club Ltd
Barking & Dagenham CCG	Capital Property & Construction Consultants Ltd	Chelmsford Star Co-operative Society Ltd
Barking & Dagenham London Borough Council	Carter Jonas	Chelmsford Taxi Association Limited
Barnes Farm Infant School	Castle Point & Rochford CCG	Chelmsford Theatre Workshop
Barnes Farm Junior School	Castle Point Council	Chelmsford Young Generation Amateur Musical Society
Barnston Parish Council	CBRE	Cheltenham Borough Council
Barratt Eastern Counties	Cemex UK Properties Ltd	CHESS
Barton Willmore	Centrica Barry/ Generation/ KL/ PB/ RPS LTD	Chignal Parish Council
Basildon & Brentwood CCG	CERA (Chignal Estate Residents Association)	CHP
Basildon Borough Council	Chancellor Park Primary School	CHP Customer Review Panel
Baya Homes	Charisma Spatial Planning	Chris Marten Architectural Services
BDB Design	Chartplan (2004) Limited	Chris Tivey Associates
BDP	Chelmer & Blackwater Navigation Co Ltd	Christian Growth Centre Chelmsford
Beehive Lane County Primary School	Chelmer Canal Trust	Church of Our Lady Immaculate
Bennetts BMW Specialists		Churchill Retirement Living
		Civil Aviation Authority
		Claremont Planning

Clarke & Simpson	DTI	Essex Respite and Care Association
Coal Authority	DWD Property & Planning	Essex Squash & Racketball Association
CODE Development Planners	E & M Design	Essex Waterways Ltd
Code for Consideration Constructors	E.ON UK Plc	Essex Wildlife Trust
Colchester City Council	E2V Technologies	Estuary Design Ltd
Cold Norton Parish Council	East Anglia London Properties Ltd	Estuary Housing Association
Collingwood Primary School	East Hanningfield Parish Council	Exolum Pipeline System Ltd
Colt Technology Services	East Hanningfield Parish Plan Committee	Farleigh Hospice
Columbus School & College	East Herts District Council	Felsted Parish Council
Commercial Estates Group	East of England Ambulance Service NHS Trust	Fenn Wright
Company of Proprietors of the Chelmer & Blackwater Navigation Ltd	East Thames Housing	Fergusons
Confederation of Passenger Transport UK (Hedingham/Chambers)	Eastlight Homes	First Essex Buses Ltd
Cool Heat Services	Ecotricity	Fisher German LLP
Corona Energy Retail 4 Ltd	EDF Energy	Flagship Housing Group Ltd
Countrywide Farmers Plc	Education & Skills Funding Agency	Flaternity Residents Association
CPRE Essex	Edward Gittins & Associates	Fritch Green Parish Council
Craintern Ltd	Edward Parsley Associates Ltd	Football Association
Crest Nicholson	EE	Ford End Church of England Primary School
Crouch Vale Brewery Ltd	Elim Christian Centre	Ford End Village Design Statement Committee
Crown Energy Ltd	Elm Green Preparatory School	Forestry Commission England
CSJ Planning Consultants Ltd	Elmwood Primary School	Frazer Halls Associates
D2 Planning Limited	Energy Environment and Sustainability Group	Friends, Families and Travellers and Traveller Law Reform Project
Danbury Mission	Enfield CCG	G.T.C/Utility Grid Installations
Danbury Neighbourhood Plan Steering Group	Enfield London Borough Council English	Galleywood Infant School
Danbury Park Community Primary School	Rural Housing Association	Galleywood Parish Council
Danbury Parish Council	ENI UK Ltd	GB Partnerships
Danbury Society	Enplan	Good Easter Parish Council
Dandara	Environment Agency	Great Baddow High School
Data Energy Management Services Ltd	Epping Forest District Council	GL Hearn Limited
Defence Infrastructure Organisation (DIO)	ERGOTECHNICS	Gladman Developments Ltd
Department for Education	esperance energies	Graham Anthony Associates
Department for Levelling Up, Housing and Communities	Essex & Suffolk Water	Great Baddow High School
Department for Transport (DfT)	Essex Ambulance Service	Great Baddow Parish Council
Department of Trade and Industry	Essex ARG	Great Baddow St Mary
Derbyshire Gypsy Liaison Group	Essex Association of Local Councils	Great Notley Parish Council
Design Council	Essex Badger Protection Group	Great Waltham C of E (VC) Primary School
detoxpeople ltd	Essex Biodiversity Project	Great & Little Leighs Parish Council
Development Land & Planning Consultants Ltd	Essex Bridleways Association	Great Waltham Parish Council
DevPlan UK	Essex Chamber of Commerce	Greater London Authority
DHA Planning	Essex Chronicle	Green Planning Studio Ltd
Diageo Pension Trust Fund	Essex County Council	Greenfields Community Housing Ltd
Diocese of Chelmsford	Essex County Fire & Rescue Service	Greenwood Estates Ltd
Dominic Lawson Bespoke Planning Ltd	Essex Herts Air Ambulance Trust Essex	Grosvenor Developments Ltd
Dominvs Group	Local Nature Partnership	GVA Grimley
Downham CE (VC) Primary School	Essex Police	H M Prison Service
	Essex Police, Fire and Crime Commissioner	Hamilton Bentley & Partners



Harlequin Ltd	Landscape Planning Group Ltd	Moody Homes Ltd
Harlow District Council	Langford and Ulting Parish Council	Moulsham High School
Hastoe Housing Association	Lanpro	Moulsham Infant School
Hatfield Peverel Parish Council	Larkrise Primary School	Moulsham Junior School
Havering CCG	Larmar Engineering	Mountnessing Parish Council
Havering London Borough	Latimer Homes	N Clark Welding & Fabrication
Health and Safety Executive	Lawford Mead Primary & Nursery School	Nathaniel Lichfield and Partners
Heart of Essex Local Enterprise Partnership	Lawns Action Group	National Grid
Heathcote School	Little Baddow Conservation Society	National Highways
Heatons	Little Baddow Parish Council	Natural England
Help The Aged	Little Dunmow Parish Council	Neos Networks
Helping Hands Essex	Little Waltham C E V A Primary School	Network Rail
Heritage Writtle	Little Waltham Parish Council	New Hall School
Hertfordshire County Council	Lodge Coaches	Newlands Spring Primary School
High Easter Parish Council	London Borough of Barking and Dagenham	Newlands Spring Residents Association
High Ongar Parish Council	London Borough of Enfield	NFGLG
Highwood Parish Council	London Borough of Redbridge	NGB Essex Angling
Highwood Primary School	London Borough of Waltham Forest	NGB Essex Athletics
Hill	London Gypsies and Travellers Unit	NGB Essex Basketball
Historic England	LSL Partners	NGB Essex Boccia
HLR Consulting Ltd	Maldon District Council	NGB Essex Bowls
Home Builders Federation	Maltese Road Primary School	NGB Essex Cricket
Homes England	Mansfield Monk Limited	NGB Essex Cycling
House Of Commons	Marconi Plaza Residents Association	NGB Essex Dodgeball
Howe Green Community Association	Margaretting CE (VC) Primary School	NGB Essex Fencing
Hullbridge Parish Council	Marine Management Organisation (MMO)	NGB Essex Football
Hunter Page Planning	Mark Jackson Planning	NGB Essex Golf
Hylands School	Margaret Roding Parish Council	NGB Essex Gymnastics
Iceni Projects	Margaretting Parish Council	NGB Essex Handball
Ideas Hub	Mashbury Parish Council	NGB Essex Hockey
Indigo Planning Ltd	Maypole Press & Publishing Co	NGB Essex Lacrosse
Ingatestone and Fryerning Parish Council	McDonald's Restaurants	NGB Essex Movement and Dance
Ingatestone Village Design Statement	Meadgate Primary School	NGB Essex Orienteering
Intergen	Meadows Shopping Centre	NGB Essex Petanque
J. Aron & Company	Melville Dunbar Associates	NGB Essex Rowing
James Development Ltd	Michael Benham Acquisition/Disposal of Land & Property	NGB Essex Rugby League
JB Planning Associates Ltd	Mid and South Essex Health and Care Partnership	NGB Essex Rugby Union
JCN Design Ltd	Mid Essex CCG	NGB Essex Sailing
John H Bayliss & Co	Mid Essex Gravel Pits (Chelmsford) Ltd	NGB Essex Squash
Keeble Brothers	Mid Essex Hospital Services NHS Trust	NGB Essex Triathlon
Keeran Designs Ltd	Mid-Essex Business Group	NGB Essex Volleyball
Kemsley LLP	Mildmay Infant and Nursery School	NHS England, East
King Edward Grammar School	Moat Housing Group	NHS Mid and South Essex Sustainability and Transformation Partnership
Kings Hardware Ltd	Mobile Broadband Network Limited	NHS South East and South West Essex
Kings Road Primary School	Mono Consultants Ltd	NIBS Buses
Kings Road/North Avenue Community Action Group	Montagu Evans	Nigel Chapman Associates
Lambert Smith Hampton		North Essex Partnership NHS Foundation Trust

North Fambridge Parish Council	Rettendon Common Residents Association	Springfields Planning & Development Limited
North West Parishes Group	Rettendon Parish Council	SSE Pipelines Ltd
Northern Trust	Rettendon Primary School	St Anne's Preparatory School
Oaklands Infants School	River Crouch Conservation Trust	St Augustine's Catholic Church
Office of Rail Regulation	Road Haulage Association	St Cedd's School
Opus Energy Ltd	Robert Brett & Sons Ltd	St John Payne Catholic School
Our Lady Immaculate R C Primary School	Robinson and Hall	St John's C of E Primary School
Parkway and Town Centre Neighbourhood Action Panel	Rochford District Council	St Joseph's Catholic Primary School
Parkwood Academy	Roxwell CofE (VC) Primary School	St Mary's CE Primary School
Paul Dickinson & Associates	Roxwell Parish Council	St Mary's Church Great Baddow
Peacock & Smith	Royal Mail Group	St Peters Primary School
Pegasus Group	Royal Society For Protection of Birds	St Pius X Catholic Primary School
Pegasus Planning Group Ltd	RPS Group	St. Michael's Junior School
Perryfields County Infants School	RPS Planning & Development Ltd	Stephenson's of Essex Ltd
Perryfields Junior School	RSPCA	Stevens VW Dismantlers
Persimmon Homes Essex	Rugby Football Union	Stock CE Primary School
Phase 2 Planning & Development Ltd	Rugbytots Central Essex	Stock Parish Council
PKC Retail Ltd	Runwell Parish Council	Stonebond Properties Ltd
PlanIt Planning and Development Ltd	Rural Solutions Ltd	Stow Maries Parish Council
Planning Potential	Ruston Planning Limited	Strutt & Parker LLP
Planware Ltd	Sandon School	Swan Housing Association
Plater Claiborne Architecture & Design	Sandon Parish Council	Sworders
Pleshey Parish Council	Savills (UK) Limited	Tarmac
Pomery Planning Consultants	Scott Brownrigg	Telecom Plus PLC
Premier Homes	Scottish & Southern Energy Pipelines	Tendring District Council
Prestige Pianos	Sellwood Planning	Terence O'Rourke Ltd
Princes Rd Allotment Association	Shirley Smith & Co	Terling and Fairstead Parish Council
Priory Primary School	Shotgate Parish Council	Thames Gateway South Essex Partnership Ltd
PS Planning & Design	Sky Telecommunication Services Ltd	The Beaulieu Park School
Ptarmigan Land Ltd	Smart Planning	The Boswells School
Purleigh Parish Council	Smiths Environmental Products Ltd	The British Horse Society
Ramblers Essex Area	South East LEP	The Cathedral School Chelmsford
Ramsden Bellhouse Parish Council	South Molton Real Estate Ltd	The Chelmsford Ballet Company
Ramsden Crays Parish Council	South Woodham Action Group	The Chelmsford Labour Party
Rapleys	South Woodham Ferrers Health & Social Care Group	The Chelmsford Society
Rawreth Parish Council	South Woodham Ferrers Town Council	The Coal Authority
Rayleigh Town Council	Southend City Council	The Downes Planning Partnership
Raymond Stemp Associates	Southend CCG	The Essex Badger Protection Group
Rayne Parish Council	Southern Electric	The Gypsy Council
RCCE	South Hanningfield Parish Council	The Inland Waterways Association (Chelmsford Branch)
Redbridge CCG	SP PowerSystems	The John Bishop Partnership
Redbridge London Borough Council	SPD Studio	The JTS Partnership LLP
Regal Busways	Sphere 25	The Land Trust
Rentplus (Agents Tetlow King Planning)	Sport England	The Landscape Conservation Trust
Reprohouse Limited	Springboard Housing Association Ltd	The National Cycling Charity – CTC
Resting Places Limited	Springfield Parish Council	The National Federation of Gypsy Liaison Groups
Retail Focus	Springfield Primary School	

The Owen Partnership  
The Royal Horticultural Society  
The Sandon School  
The Showmen's Guild of Great Britain  
The Theatres Trust  
The Tyrells Primary School  
The Wilderness Foundation UK  
The Writtle Surgery  
Third Dimension Group Ltd  
Three  
Thriftwood School  
Thurrock Borough Council  
TMA Chartered Surveyors  
Tolhurst Fisher LLP Solicitors  
Total Gas and Power Ltd  
Transition Chelmsford  
Transport East  
Transport for London  
Traveller Law Reform Project  
Travelling Showmans Guild  
Tree Fella Plc  
Trinity PPP Limited  
Trinity Road Primary School  
Trinity St Mary's CE (VA) Primary School  
Tritton Family Trust  
Turley Associates  
UK Power Networks  
Uttlesford District Council  
Village Hall Committee  
Virgin Media Services  
Vitol Gas Ltd  
Vodafone and O2  
W & H Marriage & Sons Ltd  
Waitrose Ltd  
Wallace Land Investments  
Waltham Forest CCG  
Waltham Forest London Borough Council  
Warwick Court Property Company  
Waterhouse Farm Residents Association  
WEA Sec  
Wernick Buildings Ltd  
West Essex CCG  
West Hanningfield Parish Council  
West Register (Realisations) Ltd  
Westlands Community Primary School  
WH Marriage & Sons Ltd  
Whirledge and Nott  
Widford Lodge Preparatory School  
William de Ferrers School  
Willingale Parish Council  
Wilson Construction Ltd  
Womens Institute  
Woodham Ferrers and Bicknacre Parish Council  
Woodham Mortimer with Hazeleigh Parish Council  
Woodham Walter Parish Council  
Woodland Trust  
Woodville Primary School  
Woolf Bond Planning  
Writtle University College  
Writtle Infant School  
Writtle Junior School  
Writtle Neighbourhood Plan Group  
Writtle Parish Council  
Writtle VDS  
YMCA Chelmsford  
Essex Local Nature Partnership

# CONSULTATION STATEMENT



## REVIEW OF CHELMSFORD LOCAL PLAN REGULATION 18 - ISSUES AND OPTIONS

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

The consultation runs for eight weeks from **10am on Thursday 11 August 2022 until 4pm on Thursday 6 October 2022.**

### **Regulation 18 Issues and Options Consultation Document**

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

The main purpose of the document is to ensure that the review of the adopted Local Plan will cover the right issues and that all suitable options for accommodating change are considered. The main areas we are consulting on include:

- Updated challenges and opportunities to address over the reviewed Local Plan period to 2041
- Updated draft Strategic Priorities
- New draft Vision
- The approach to calculating future development requirements, including homes and jobs
- Spatial Approaches for accommodating additional future development growth, and
- The approach to reviewing planning policies.

### **Regulation 18 Issues and 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.

### **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 (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)

### **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 as well as having an in-person exhibition 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).

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

**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 8th September 2022, 6pm to 9pm
- Friday 9th September 2022, 10am to 1pm
- Friday 9th September 2022, 2pm to 5pm
- Saturday 10th September 2022, 10am to 1pm

**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 made by you must be received by the Council no later than 4pm on Thursday 6 October 2022.**

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.

David Green  
Director of Sustainable Communities

August 2022

# 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. We need to review the plan at least every five years, to see if we need to update it. This is to make sure it remains up to date and meets the changing needs of our current and future residents.

This consultation is called the Issues and Options. It is our first stage towards updating the adopted Local Plan and is a starting point for us to engage with our communities.

We need to make sure that we are planning for new housing, jobs and infrastructure to meet local needs until 2041. 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 is included in the consultation?

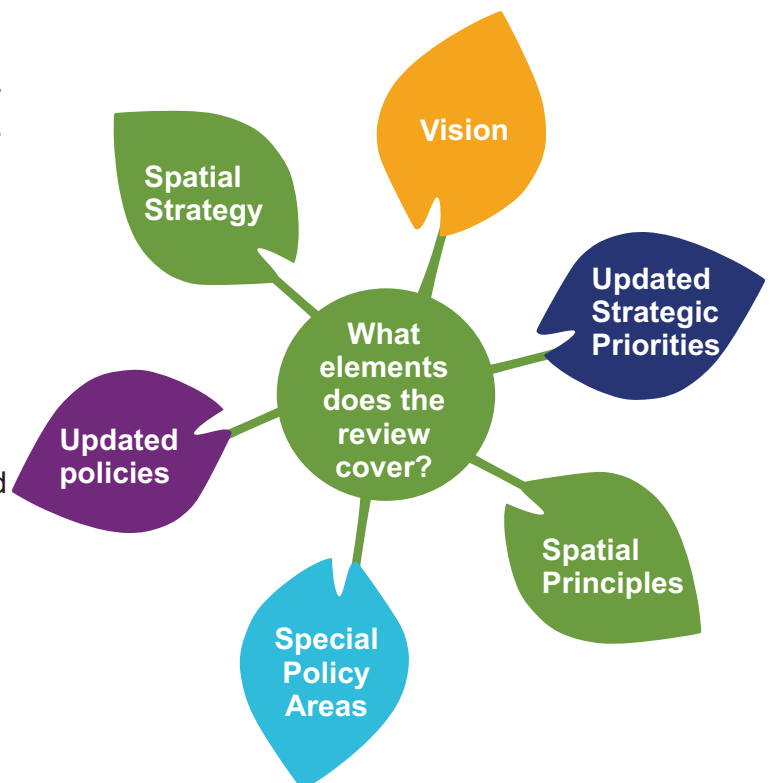
We want to make sure we cover the right issues and that all the suitable options for accommodating change are considered. The main areas we are consulting on are:

- Updated draft Strategic Priorities
- New draft Vision
- The approach to future development numbers, including homes and jobs

- Spatial Strategy Approaches for accommodating additional future growth to 2041
- The approach to reviewing our planning policies.

We think that many parts of the adopted Local Plan and its policies are still up to date and generally performing well, so may require no or only partial changes. Other parts will need updating alongside additional new policies that are required to reflect the latest national planning policy requirements, the Council's new ambitions and aspirations, and to meet new development growth to 2041.

As such, the review process is expected to result in changes to the adopted Local Plan – but we are not working on a completely new plan. Also, the review will not reopen any debates about sites already allocated in the Local Plan.





# Key Challenges and Opportunities

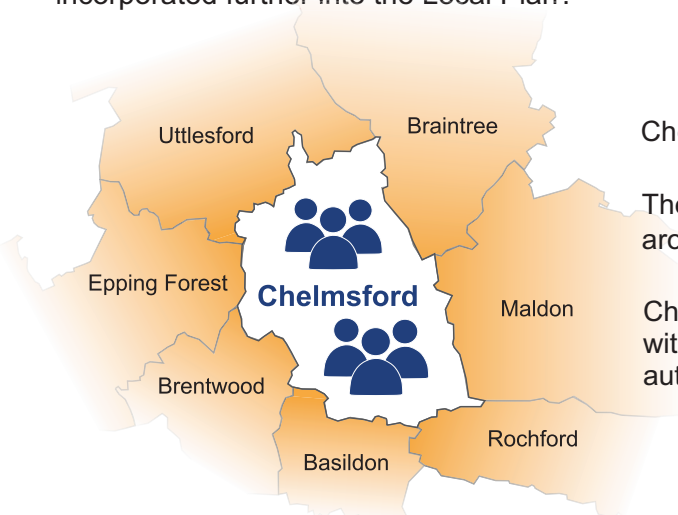
There are a number of key challenges and opportunities for the Local Plan to address over the period to 2041. These cover requirements of national planning policy and regulations that we must meet, as well as local issues that we need to respond to.

## Key challenges that we have identified include:

- Meeting Chelmsford's new housing and employment requirements to 2041
- How can we address the climate and ecological emergency?
- What can we do to address the affordable housing crisis?
- How will economic change impact employment opportunities including recovery from Covid-19?
- The future role of City/town centre retail areas including changes in how people shop, and changes to the Use Classes Order, including Permitted Development
- The role of Special Policy Areas (SPA) for large institutions that lie outside the built-up areas, where ordinarily policy would constrain new development
- The need to build stronger communities with community infrastructure, improved health and wellbeing
- How do we protect and increase biodiversity (net gain)?
- Ensuring that development provides great places and spaces
- How can sustainable and active travel be incorporated further into the Local Plan?

## Key opportunities that we have identified include:

- Chelmsford is ranked as one of the least deprived local authorities in England, however there are pockets of deprivation in the urban area of Chelmsford
- Essex is forecast to experience significant new growth and change over the coming decades
- A strong and growing economy and employment base, with opportunities for sector development, innovation, and new technologies
- Good connectivity by road and rail with a new Chelmsford North East bypass and rail station opening in North East Chelmsford in the mid-2020s
- A high-quality environment with a growing multifunctional green infrastructure offer including new country parks, play areas, green spaces and greening the built environment
- A growing network of cycleways and an extensive Green Wedge network providing opportunities to increase active and sustainable transport
- New development will contribute through S106 contributions and Community Infrastructure Levy payments towards new and improved services, facilities and infrastructure in the area
- Tackling the climate and ecological emergency can support the development of green jobs, reduce flood risk and create new habitats
- Planned new community facilities and services, including schools, early years and childcare and shops can improve social integration.



Chelmsford was the first town granted **City status** in Essex

The population of Chelmsford has increased by 7.8% from around 168,300 in 2011 to **181,500 in 2021**

Chelmsford is at the **heart of Essex**, being centrally located within the County and adjoined by seven neighbouring local authorities





# Vision (Chelmsford in the future)

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.

## How we are reviewing the Vision

We have reviewed the Local Plan Vision to reflect the new local priorities within Our Chelmsford, Our Plan, which is the Council's updated Corporate 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 Council's new corporate plan, to make it easier to use.

The Vision is also designed to contribute to creating sustainable development and provides a good foundation for the review of the remainder of the adopted Local Plan.

## The proposed updated Vision is:

**Guiding Chelmsford's growth towards a greener, fairer and more connected community.**

## Our Strategic Priorities

Our Strategic Priorities are the key priorities that the Local Plan is based on. It is very important that we consider these issues which might have a wider impact, not only within but also outside the Council's area. They look at what Chelmsford is like today, how things are changing, the issues that need to be addressed, and what opportunities may be created in future. These priorities set the overall policy direction for all the strategic policies, site allocations and development management policies in the Local Plan.

We are proposing some new priorities to help us act on the climate change and ecological emergency, and others have been updated to reflect new opportunities. We have also grouped the priorities to make sure the links between them are clear and that they can act together to achieve the best outcomes.

## Priorities for climate



Addressing the Climate and Ecological Emergency (NEW priority)



Promoting smart, active travel and sustainable transport (NEW priority)



Protecting and enhancing the natural and historic environment, and support an increase in biodiversity and ecological networks

## Priorities for growth



Ensuring sustainable patterns of development and protecting the Green Belt



Meeting the needs for new homes



Fostering growth and investment and providing new jobs

## Priorities for place



Creating well designed and attractive places, and promoting the health and social wellbeing of communities



Delivering new and improved infrastructure to support growth



Encouraging resilience in retail, leisure, commercial and cultural development





# 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.

In reviewing the Local Plan, we need to work out how many more houses and jobs we need to plan for until 2041. Using a formula set by the Government, called the standard method, we can work out a minimum figure for the number of houses needed. Then we add a buffer to make sure we can be flexible if some sites do not come forward, to meet the housing needs of specific groups, and to significantly boost the supply of different sizes and types of homes in the Council's area.

We estimate this to be an additional 7,966 homes by 2041.

The Local Plan will also need to meet future employment needs, and it may mean allocating some additional sites for employment development. We are carrying out a study of employment needs to make sure we can update our policies to support the economy in terms of providing sites for new jobs if required.

## Spatial Principles

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. We will consider a number of things to guide development to the most sustainable locations. We call these the Spatial Principles.

We want to update these through the review of the Local Plan. They are similar to what we have adopted in the Local Plan, with some changes to wording to make sure they are up to date.

Proposed Spatial Principles
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 and enhance the renewal and 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 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



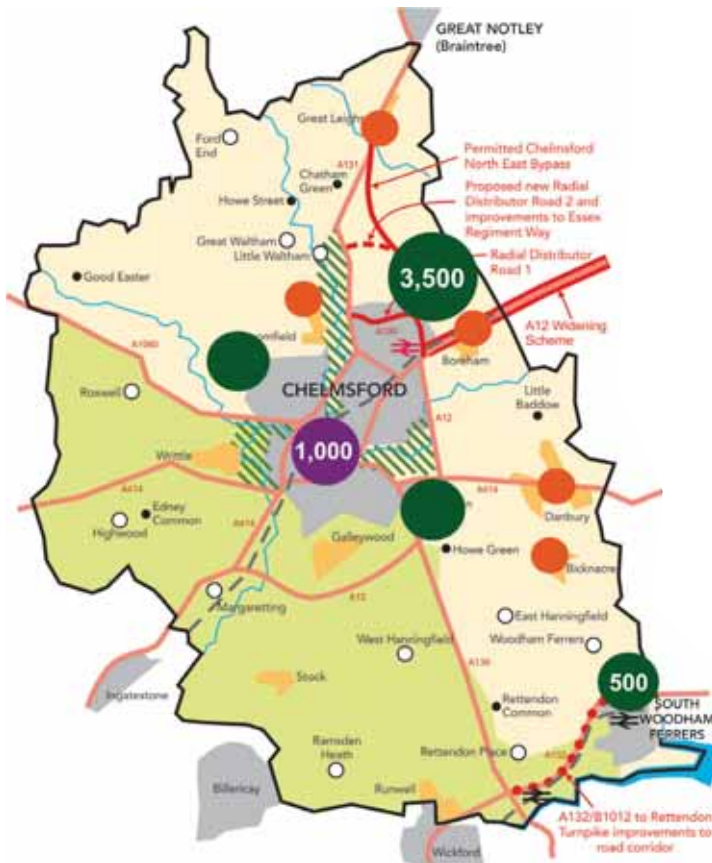
# Where could growth be located?

There are several ways that growth can be accommodated, and therefore where sites are allocated. We consider an area's population, proximity to facilities, wellbeing of residents, land availability, what you tell us during the consultation, and lots of evidence on important matters.

We are looking at different approaches to see how the growth we need can be accommodated. The five approaches (referenced A to E) set out the same amount of growth but use different types of location. We do not identify any preferred options or specific development sites. We have shown an indicative number of homes for each location, which will be refined and informed by the results of the consultation and the evidence.

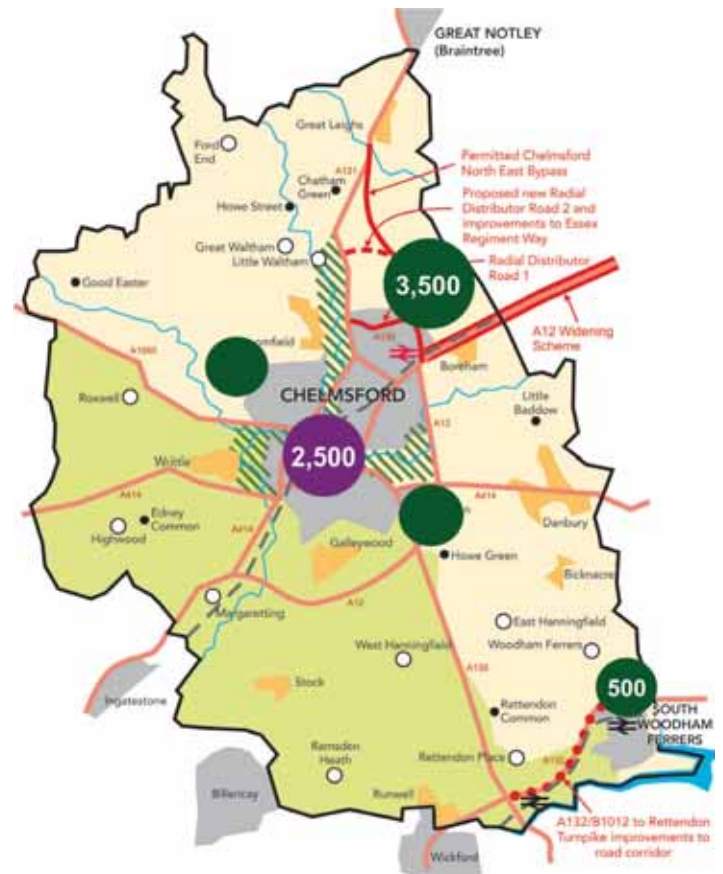
None of these include areas in the Green Belt, which is not being considered for new development allocations.

The feedback we receive during the consultation will be key to deciding which approach to follow, which might not be one of the five listed, but a combination of the most sustainable and deliverable elements.



## Approach A – Growing the existing strategy -

This continues the approach already being used in the adopted Local Plan, with new allocations on previously developed land (1,000) and at larger villages (1,500 in total across one or more of the settlements of Bicknacre, Boreham, Broomfield, Danbury or Great Leighs) and expanding allocated sites (1,500 in total across West and East Chelmsford, 500 at South Woodham Ferrers and 3,500 at Chelmsford Garden Community).



## Approach B – Concentrating growth in urban areas -

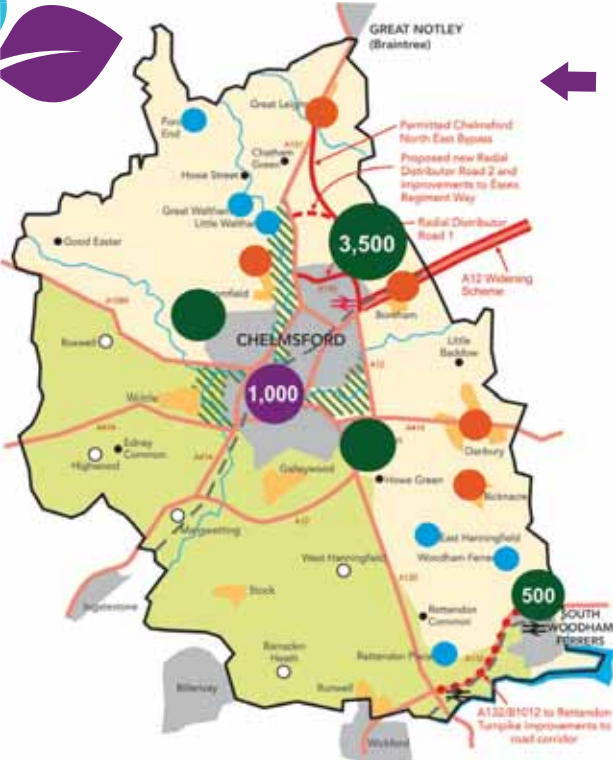
This continues the approach already being used in the adopted Local Plan, but maximises development in the City Centre and urban area (2,500) and expands allocated sites (1,500 in total across West and East Chelmsford, 500 at South Woodham Ferrers and 3,500 at Chelmsford Garden Community).



# Where could growth be located?

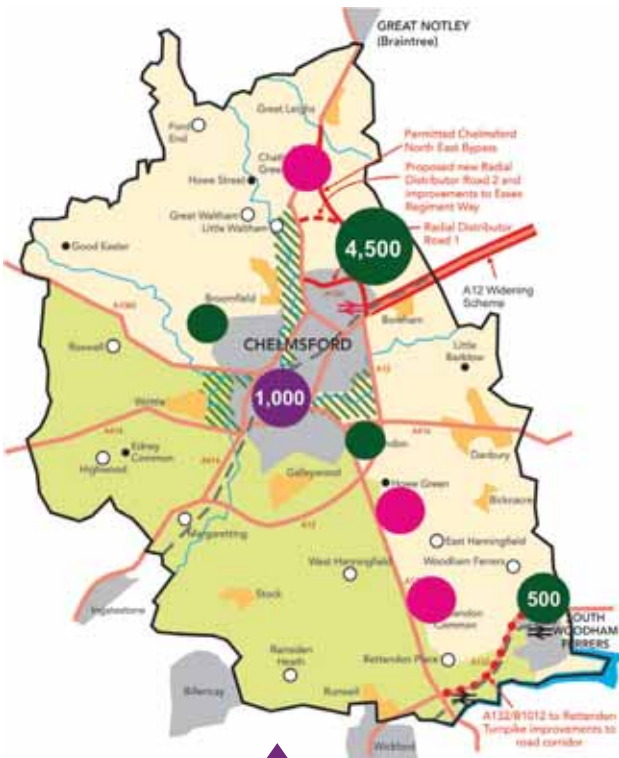
## Approach C – Exploring a wider strategy -

This continues the approach already being used in the adopted Local Plan, with new allocations on previously developed land (1,000) and at larger villages (1,000 in total across one or more settlements of Bicknacre, Boreham, Broomfield, Danbury or Great Leighs), and expanding allocated sites (1,500 in total across West and East Chelmsford, 500 at South Woodham Ferrers and 3,500 at Chelmsford Garden Community). In addition, it proposes some development at smaller villages (500 in total across one or more settlement of East Hanningfield, Ford End, Gt Waltham, Lt Waltham, Rettendon Place and Woodham Ferrers).



## Approach E – Exploring a new settlement -

This continues the approach already being used in the adopted Local Plan, with new allocations on previously developed land (1,000) and expanding the Chelmsford Garden Community (3,000). In addition, it proposes a large new settlement/garden community (4,000 at Hammonds Farm, east of A12/north of A414).



## Approach D – Exploring growth along transport corridors -

This continues the approach already being used in the adopted Local Plan, with new allocations on previously developed land (1,000), expanding allocated sites (500 in total across West and East Chelmsford, and 500 at South Woodham Ferrers), and maximising growth at Chelmsford Garden Community (4,500). In addition, it proposes some growth along main transport corridors (1,500 in total across one or more settlement of Chatham Green, Howe Green and Rettendon Common).





# Sustainable development

It's very important to make sure the Local Plan is focused on the most sustainable way of meeting the area's needs.

This covers a number of aspects, which we are reviewing through an independent Integrated Impact Assessment (IIA). This assesses social, economic and environmental effects of the review of the Local Plan, alongside health and equality impacts. We will be asking some separate questions about this as part of the consultation.

The IIA advises on ways in which any adverse effects could be avoided, reduced or mitigated or how any positive effects could be maximised. This helps us to ensure that any changes to the policies and allocations in the Local Plan are promoting sustainable development. The IIA covers the following:

- ✔ Sustainability Appraisal (SA)
- ✔ Strategic Environmental Assessment (SEA)
- ✔ Habitats Regulations Assessment (HRA)
- ✔ Health Impact Assessment (HIA)
- ✔ Equality Impact Assessment (EqIA).

This will be repeated at each stage of the Local Plan review. We will publish a report to accompany each consultation showing the assessment, the outcomes of previous consultation stages, how comments have been taken into consideration, and any changes which are proposed to the review of the Plan as a result.



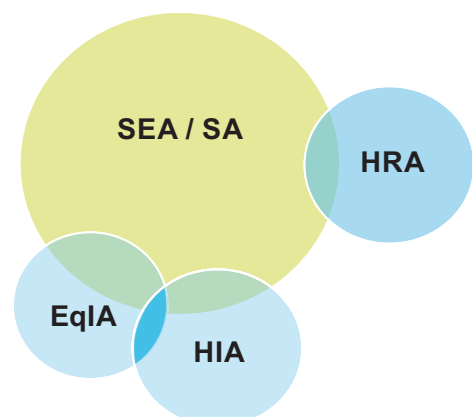
## Other evidence

Local Plans are not developed in isolation, they must be based on evidence. We will be updating some existing evidence base studies and producing some new ones to inform the review of the Local Plan. These include:

- ✔ Strategic Housing Needs Assessment
- ✔ Employment Needs Study
- ✔ Strategic Housing and Employment Land Availability Assessment (SHELAA)
- ✔ Retail and Leisure Needs Study
- ✔ Village/Settlement Audits
- ✔ Infrastructure Delivery Plan
- ✔ Viability Assessment
- ✔ Strategic Flood Risk Assessment
- ✔ Water Cycle Study
- ✔ Transport studies and highways modelling
- ✔ Heritage Impact Assessment
- ✔ Open Space Assessment.

These will all be published on our website as they are produced so you can see what we have based our decisions on. As the review progresses, we will also summarise key evidence into 'topic papers' which will give an overview of what the evidence is saying.

Overlap between the different forms of assessment





# How to comment

This is your opportunity to feed into the review process at an early stage and help to shape the plan and the future of your area.

You can view the consultation documents on our specially designed consultation portal [www.chelmsford.gov.uk/planningpolicyconsult](http://www.chelmsford.gov.uk/planningpolicyconsult)

The consultation documents are:

- Issues and Options Consultation Document 2022 (with questions included)
- Integrated Impact Assessment (IIA) of the Review of the Adopted Local Plan

Our preferred means of receiving comments is through the consultation portal. This ensures that your comments are recorded accurately and are processed quickly. This system also 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.

There will be opportunities to meet with planning staff face-to-face at public drop-in exhibitions or to attend a webinar during the consultation period.

We have also published a summary newsletter.

You can find out more on our website [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review)

**The consultation on the Issues and Options document runs for ten weeks from 10am on Thursday 11 August to 4pm on Thursday 20 October 2022.**

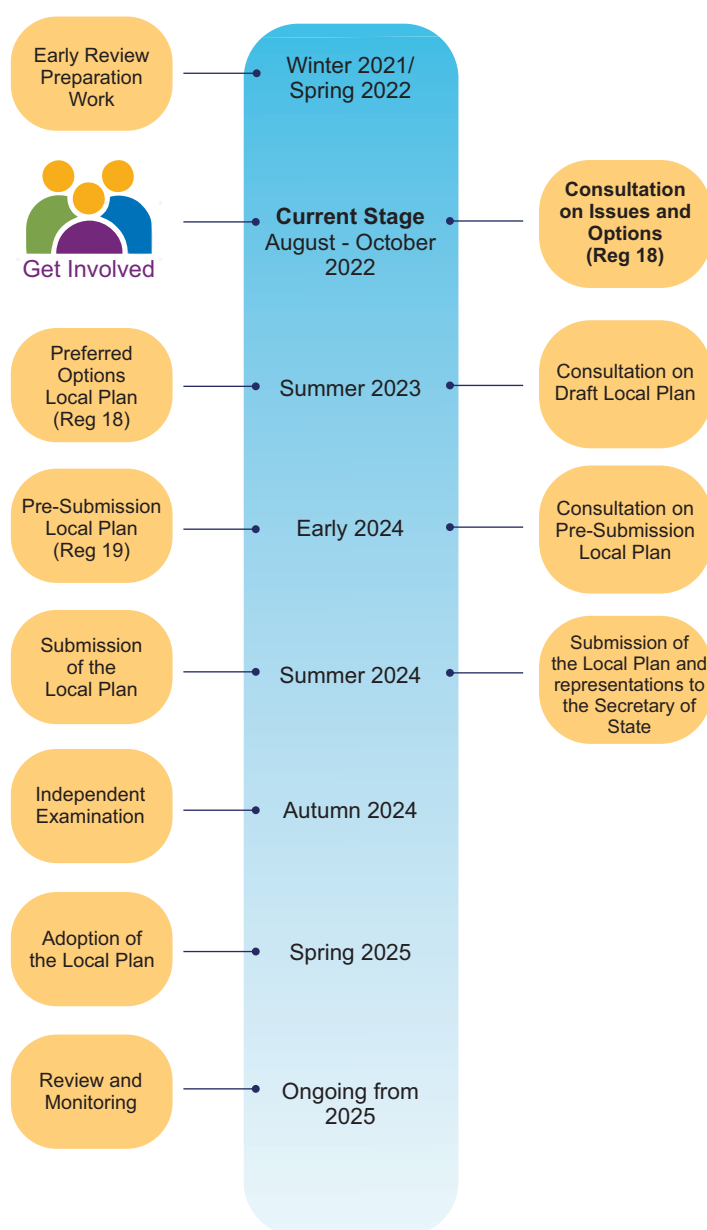
## What happens next

We will consider all the comments received alongside further studies, the findings of the IIA and national planning policy to develop preferred options and specific proposals for sites and policies.

This will be set out in a Preferred Options Review Plan, which will be published for public consultation in summer 2023.

The key stages in the new Local Plan preparation are:

### Timetable of Local Plan review





# Frequently Asked Questions

## What status does the Issues and Options Local Plan have?

In accordance with the NPPF, as this is the first stage of the Review of the Local Plan (which is early in the Plan making process) limited weight in the determination of planning applications will be given to this consultation document.

## What will happen to the current Local Plan?

The current adopted Local Plan will remain in place until such time as the review is complete. At this point the review Plan will replace the current adopted Local Plan.

## How can I bring land forward for development?

You can promote land to us through our Call for Sites facility. Sites submitted to us will be assessed through our Strategic Housing and Employment Land Availability Assessment (SHELAA) following the close of the Issues and Options Consultation.

More information can be found on our website at: <https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-local-plan/call-for-sites-shelaa-and-parish-maps/>

## What does the Review mean for Neighbourhood Planning?

South Woodham Ferrers and Writtle have adopted Neighbourhood Plans which form part of the adopted Local Plan. They will be checked when the reviewed Local Plan is adopted to ensure they remain compatible.

Work will continue on the emerging Neighbourhood Plans for Boreham, Broomfield, Danbury, East Hanningfield, Little Baddow, and Sandon. They will need to reflect the current stage of the review of the Local Plan as they progress.

## What has new development brought to Chelmsford?

The priorities of the adopted Local Plan, delivery of allocated sites and developer contributions are bringing new development, improvements and infrastructure to Chelmsford, including:

- Housing and commercial development
- Community facilities
- Transport infrastructure
- Community Infrastructure Levy (CIL) contributions.

## Are there other Local Plan exhibitions?

We have rearranged in-person exhibitions at the Chelmsford Council Chamber to the following dates:

- Friday 7th October 2022, 11am to 2pm
- Saturday 8th October 2022, 10am to 1pm





# 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)



**POP-UP STANDS ON SITE**



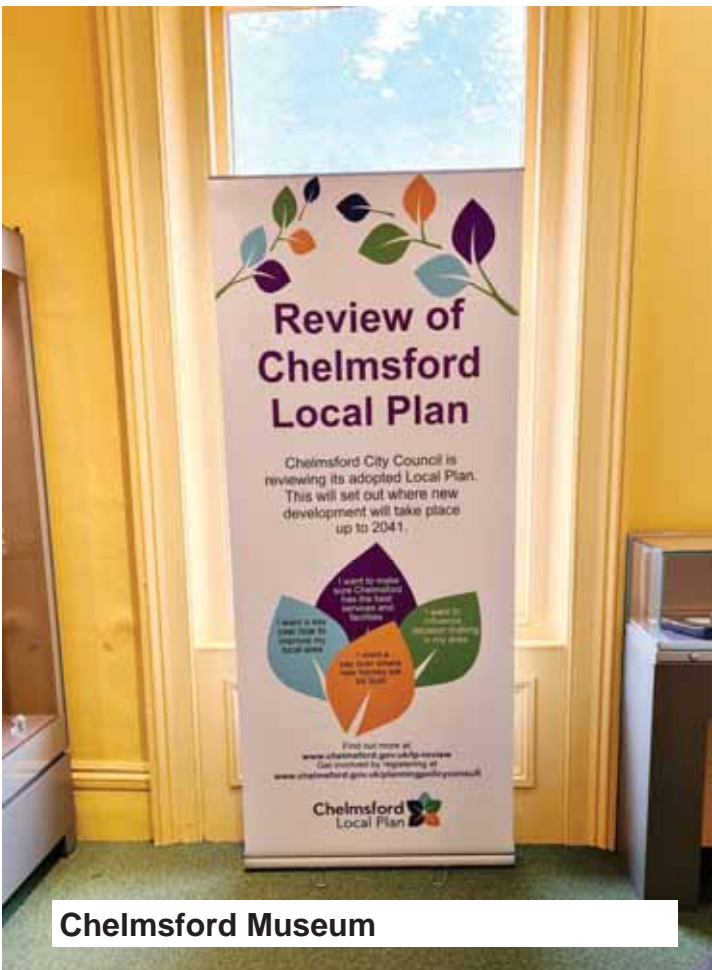
**Chelmsford Sport and Athletics Centre**



**Riverside Leisure Centre**



**South Woodham Ferrers 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>



Online virtual exhibition: <https://chelmsford.vercel.app/>



# Review of the Chelmsford Local Plan - Get involved now!

The Council's Local Plan was adopted in 2020 and guides growth and development across Chelmsford City Council's area to 2036. It 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 is commencing a review of its adopted Local Plan with the first Issues and Options consultation running from 11 August to 6 October 2022.

The review process is expected to result in changes to the adopted Local Plan – but we are not working on a completely new plan from scratch. It is also not a reopening of any debates about already allocated sites.

The purpose of the consultation is to ensure that the review covers the right issues and that all suitable options for accommodating change are considered. The main areas we are consulting on include:

- Updated challenges and opportunities to address over the reviewed Local Plan period to 2041
- Updated draft Strategic Priorities
- New draft Vision
- The approach to calculating future development requirements, including homes and jobs
- Spatial Approaches for accommodating additional future development growth, and
- The approach to reviewing planning policies.

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

**Chelmsford**  
Local Plan 

Essex Chronicle 11 August 2022

# Review of the Chelmsford Local Plan - CONSULTATION PERIOD EXTENDED TO 20 OCTOBER 2022 & NEW EXHIBITION DATES

Thank you to those who have already made comments. If you haven't yet it's not too late!

The Council's Local Plan was adopted in 2020 and guides growth and development across Chelmsford City Council's area to 2036. It 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 is commencing a review of its adopted Local Plan with the first Issues and Options consultation running from 11 August to the extended date of 20 October 2022.

The review process is expected to result in changes to the adopted Local Plan – but we are not working on a completely new plan from scratch. It is also not a reopening of any debates about already allocated sites.

The purpose of the consultation is to ensure that the review covers the right issues and that all suitable options for accommodating change are considered. The main areas we are consulting on include:

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- The approach to reviewing planning policies.

For more information visit our virtual exhibition at <https://chelmsford.vercel.app/>, or go to [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review)

In-person public exhibitions rescheduled at The Civic Centre, Duke Street, Chelmsford, CM1 1JE on the following dates and times:

- Friday 7th October 2022, 11am to 2pm
- Saturday 8th October 2022, 10am to 1pm

## Why should I get involved?

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**Chelmsford**  
Local Plan 

Essex Chronicle 22 September 2022

17 January 2023 3:20 pm

Facebook Twitter Instagram

News

# Chelmsford City Council reviews Local Plan to address climate and affordable housing crises



By **Charlotte Maltby**

0 JUL 6, 2022

business, consultation, green spaces, housing, leisure



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Chel... @C... · 1h

Share your LGBTQ+ journey for an exhibition coming to @ChelmsMuseum in June 2023. Co-produced by @EssexPride and @ChelmsMuseum.

### Travel

"We will be starting the formal consultation on 11 August, and it will run for eight weeks to give people time to take part.

"There are five broad approaches to allocating growth around the district and no decisions have been made about any of this. The Local Plan review is an open consultation, and I really urge all residents to take part.

"We will ensure there will be lots of opportunities for you to get involved. You can listen online when the review is discussed at the Chelmsford Policy Board on 14 July, and we'll regularly remind you about it on social media. Don't forget, you can read all [the documents](#) on the council website."

## More details about the consultation soon

We'll have an update on the Local Plan review consultation soon and we'll be streaming the council's policy board meeting on 14 July. Details of how to tune in will be posted on the [Chelmsford City Council website](#).



[Chelmsford City Council recommended to object to new power line proposals](#)

[Live music grant for Hylands Estate](#)



By **Charlotte Maltby**

Charlotte writes stories about recycling and waste, parks, economic development, local democracy and planning.

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### Leave a Comment

five years. As Chelmsford City Council adopted its Local Plan in May 2020, the council must review it by May 2025 and that needs to start now, to properly involve the community.

To address changes in council and government policy, growing population and other issues including the climate crisis, the review extends the document to 2041. When extending the framework by five years, the council has to take into account rising population and growth in the city, so must recalculate housing demand. This affects how and where development should go.



## Your feedback will guide the Local Plan

The Local Plan allows local decision-making on how to meet a community's economic, environmental, housing and social needs. Following consultation in 2015 to 2018, the Council adopted the Local Plan 2013-2036 in May 2020.

**The council will be consulting with you on the review, and it is very important that you take part.**

Looking ahead, the council has developed five broad approaches to address the city's growth. Feedback from residents will guide the council on which approach the council should adopt or adopt a mix of approaches.

## Local Plan review consultation begins in August

At this early stage, the consultation document does not present updated policy or specific site allocations for housing or other uses. This will follow further work, feedback from this consultation and evidence gathering, and will be presented in the next stage which covers the preferred options. Throughout the document residents are asked questions to help capture views.

"Population and housing growth is inevitable," said **Cllr. Stephen Robinson, leader of Chelmsford City Council**. "It is vital that we guide that growth to address the climate and ecological emergency and the housing affordability crisis, and deliver the infrastructure and services we need to be a more connected community.

"We need you to help us make the important decisions and shape our future community," emphasised Cllr. Robinson.

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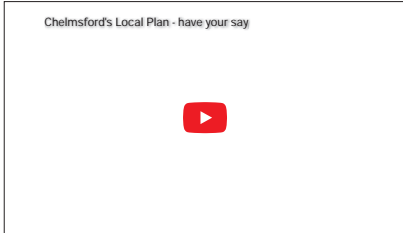


17 January 2023 3:13 pm

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# Chelmsford's future – have your say!

By **Charlotte Maltby**  
AUG 11, 2022 city, green spaces, planning



## Did you know that a lot of how Chelmsford develops in the next 20 years could be influenced by you?

The council has to have a Local Plan to guide its future growth so that Chelmsford is a greener, fairer and more connected community. **We want you to be part of this process.**

The Local Plan affects every resident of Chelmsford. It sets out how Chelmsford will grow, where businesses and homes will be located, and how we will protect our green environment and heritage.

The Government requires every council to have a local plan, otherwise developers and the Government can decide where to build houses.

## We're reviewing the plan

Councils have to review their local plan every five years. Chelmsford City Council adopted its current Local Plan in 2020 and must therefore start a review in order to complete it by 2025. The review will also extend the horizon of the Local Plan from 2036 to 2041.

This means we have to reassess our housing and employment needs to take into account projected rising population and growth in the city. So we're asking for your views.

https://citylife.chelmsford.gov.uk/2022/08/11/chelmsfords-future-have-your-say/7b5d5shAR0D6\_2jyWw0R7m5C\_Ngrw5E/VaZPSLkViyg37wTBTKC3d7DE

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## Where you can view Local Plan documents Online

You can view the consultation documents and make comments on the Council's planning policy consultation portal [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 at the Civic Centre, Duke Street, Chelmsford.

You can view an online exhibition available during the consultation period – this can be found at [www.chelmsford.gov.uk/lp-exhibition](http://www.chelmsford.gov.uk/lp-exhibition).

## In person

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.

### Exhibition dates are:

- Thursday 8 September 6pm – 9pm
- Friday 9 September 10am – 1pm
- Friday 9 September 2pm – 5pm
- Saturday 10 September 10am – 1pm

## How to respond with your views

- 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.

All comments will be used to inform the next stage of the process which is when the council chooses its preferred option.

## What has the plan delivered so far?

Feedback from earlier consultations is already reflected in the current plan. It has delivered new space for business and employment, 5,000 homes to cater for different household sizes, including affordable housing, and infrastructure such as schools and green spaces. It has expanded sustainable transport, including cycleways, with a new railway station in north Chelmsford planned to open in the next four years.



[Council calls for an end to major tax avoidance by businesses >](#)

https://citylife.chelmsford.gov.uk/2022/08/11/chelmsfords-future-have-your-say/7b5d5shAR0D6\_2jyWw0R7m5C\_Ngrw5E/VaZPSLkViyg37wTBTKC3d7DE

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## Options for Chelmsford's future growth

Looking ahead, the council has developed **five different approaches** that could be followed to address the city's growth. **It is likely that the preferred approach might not be one of the five listed, but a combination of the most sustainable and deliverable elements.**

The consultation is not a vote on which specific location is the most or least popular, but a way of assessing issues and finding the most sustainable overall strategy for delivering the area's needs. That includes our environment, infrastructure, business and education opportunities.

This is the first stage of consultation, so there will be many opportunities to be involved. There will be further consultations as the plan evolves and you will be asked for your views along the way.



## Public consultation – your voice counts

Starting Thursday, 11 August you can have your say as the council starts its public consultation on the review.

“Chelmsford City Council must address the climate & ecological emergency, the housing crisis and the need to create a more connected community. In addition, the council must take into account Government legislation and other council policies. We need to build communities (with infrastructure) not just houses.”

“The council wants input from residents to help shape the city for current and future generations and to guide how to address these priorities. This is your opportunity to influence the future of your city, so it's really important that you do have your say. There are many ways you can get involved, so do please take part in this consultation.”

*Cllr Stephen Robinson, Leader, Chelmsford City Council*

## Consultation starts Thursday 11 August

There will be many opportunities to find out more and voice your views.

The consultation on the Issues and Options document runs for an extended period of eight weeks from **10am on Thursday 11 August to 4pm on Thursday 6 October 2022.**

https://citylife.chelmsford.gov.uk/2022/08/11/chelmsfords-future-have-your-say/7b5d5shAR0D6\_2jyWw0R7m5C\_Ngrw5E/VaZPSLkViyg37wTBTKC3d7DE

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## « Gaia comes to Chelmsford Cathedral.



By **Charlotte Maltby**

Charlotte writes stories about recycling and waste, parks, economic development, local democracy and planning.

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17 January 2023 3:12 pm

News

# Open house about Chelmsford's future



By Charlotte Maltby

SEP 8, 2022 culture, democracy, green spaces, housing, planning



Now is your chance to speak to the team who are reviewing proposals for Chelmsford's future to 2041 as part of our Local Plan. The plan will affect everyone who lives, works or studies in Chelmsford.

What will it mean for you?

## Options for Chelmsford's future growth

The Local Plan will shape how Chelmsford develops in the next 20 years.

The council has developed **five different approaches** that could be followed to address the city's growth. **It is likely that the preferred approach might not be one of the five listed, but a combination of the most sustainable and deliverable elements.**

The consultation is not a vote on which specific location is the most or least popular, but a way of assessing issues and finding the most sustainable overall strategy for delivering the area's needs. That includes our environment, infrastructure, business and education opportunities.

## Speak to us: 8-10 September

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Chelmsford Cit... @ChelmsCouncil · 1h

Share your LGBTQ+ journey for an exhibition coming to @ChelmsMuseum in June 2023

Co-produced by @EssexPride and @ChelmsMuseum. Behind the Rainbow will share experiences of LGBTQ+ people in Chelmsford and Essex. 🏳️🌈

Travel



The first public consultation about the review of the plan will run until 6 October. [The Local Plan is reviewed every five years](#), so don't miss the chance to have your say at this stage.

We'll be inviting you into the Civic Centre this week to meet our policymakers. They'll be available at a real time exhibition to tell you more and help with any questions you may have.

There are three dates to choose from:

**Thursday 8 September** 6pm – 9pm

**Friday 9 September** 10am – 1pm

**Friday 9 September** 2pm – 5pm

**Saturday 10 September** 10am – 1pm

The exhibition will be at the Civic Centre, Duke Street, Chelmsford, CM1 1JE.

## Virtual tour of the Local Plan review

If you can't get to one of these sessions, don't worry, you can view a virtual exhibition online. This will allow you to see the proposals and options and explains how you can take part in the consultation: <https://chelmsford.vercel.app/>



The full Local Plan document is available online: [Local Plan Review 2022 – Chelmsford City Council](#). However, to make it more convenient, the exhibition offers a summary where you can focus on the area that is most relevant to you.

## We're reviewing the plan

The council has to have a Local Plan to guide its future growth so that Chelmsford is a greener, fairer and more connected community. Without an up-to-date local plan, the council could have very little influence over the location of new development and the provision of infrastructure.

Councils have to review their local plan every five years. Chelmsford City Council adopted its current Local Plan in 2020 and must therefore start a review in order to complete it by 2025. The review will also extend the horizon of the Local Plan from 2036 to 2041.

This means we have to reassess our housing and employment needs to take into account projected rising population and growth in the city. So we're asking for your views.

## Have your say on Chelmsford's future

This is the first stage of consultation, so there will be many opportunities to be involved. There will be further consultations as the plan evolves and you will be asked for your views along the way.

“Chelmsford City Council must address the climate and ecological emergency, the housing crisis and the need to create a more connected community. In addition, the council must take into account Government legislation and other council policies. We need to build communities (with infrastructure) not just houses.”

The council wants input from residents to help shape the city for current and future generations and to guide how to address these priorities. This is your opportunity to influence the future of your city, so it's really important that you do have your say. There are many ways you can get involved, so do please take part in this consultation.”

*Cllr Stephen Robinson, Leader, Chelmsford City Council*

## Where to view documents

You can view the consultation documents and make comments on the Council's planning policy consultation portal [www.chelmsford.gov.uk/planningpolicyconsult](http://www.chelmsford.gov.uk/planningpolicyconsult).

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All comments will be used to inform the next stage of the process which is when the council chooses its preferred option.

## What has the plan delivered so far?

Feedback from earlier consultations is already reflected in the current plan. It has delivered new space for business and employment, 5,000 homes to cater for different household sizes, including affordable housing, and infrastructure such as schools and green spaces. It has expanded sustainable transport, including cycleways, with a new railway station in north Chelmsford planned to open in the next four years.



[Gaja comes to Chelmsford Cathedral >](#)

[« A statement from the Mayor and people of Chelmsford](#)



By Charlotte Maltby

Charlotte writes stories about recycling and waste, parks, economic development, local democracy and planning.

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17 January 2023 3:16 pm

News

# Local Plan review consultation extended

By **Charlotte Maltby**  
SEP 23, 2022 city, green spaces, housing, planning



Owing to the period of national mourning for Her Majesty Queen Elizabeth II, we postponed some scheduled drop-in exhibitions about our Local Plan review.

The consultation period for the review has consequently been extended until 4pm on 20 October 2022 and new dates have been announced for the drop-in sessions.

## New drop-in exhibition dates

The rescheduled drop-in exhibitions at the Civic Centre (Duke Street, Chelmsford, CM1 1JE) will take place on the following dates:

- Friday 7 October 11am to 2pm
- Saturday 8 October 10am to 1pm

Come along and speak to the team who are reviewing proposals for Chelmsford's future to 2041.

## Local Plans decide where new developments go

This won't be the only chance to have your say on Chelmsford's future, but it is an important one. **Local Plans decide where new development goes in principle and once sites are allocated it means they will almost certainly be developed.**

<https://citylife.chelmsford.gov.uk/2022/09/23/local-plan-review-consultation-extended/>

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Share your LGBTQ+ journey for an exhibition coming to @ChelmsMuseum in June 2023. Co-produced by @EssexPride and @ChelmsMuseum.

### Travel



## Where to view documents

You can view the consultation documents and make comments on the Council's planning policy consultation portal [www.chelmsford.gov.uk/planningpolicyconsult](http://www.chelmsford.gov.uk/planningpolicyconsult).

They'll also be available to read during [normal opening hours](#) at the Council's Customer Service Centre at the Civic Centre, Duke Street, Chelmsford.

## How to respond with your views

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- 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

All comments will be used to inform the next stage of the process which is when the council chooses its preferred option.



[Mayor of Chelmsford leads city's Proclamation >](#)  
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By **Charlotte Maltby**  
Charlotte writes stories about recycling and waste, parks, economic development, local democracy and planning.

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<https://citylife.chelmsford.gov.uk/2022/09/23/local-plan-review-consultation-extended/>

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This is the [first stage of our current 5-yearly review](#) and there will be further steps before the Local Plan review is finalised, but **this is a crucial time to share your views on how and where the city develops.**

To help explain why the Local Plan is such a key part of our planning process and why you should get involved now, we've produced [this summary](#). It shows at a glance how residents' views feed into the different stages of planning the future of Chelmsford.



## Approaches for Chelmsford's future growth

The council has developed **five different approaches** that could be followed to address the city's growth. **It is likely that the preferred approach might not be one of the five listed, but a combination of the most sustainable and deliverable elements.**

The consultation is not a vote on which specific location is the most or least popular, but a way of assessing issues and finding the most sustainable overall strategy for delivering the area's needs. That includes our environment, infrastructure, business and education opportunities.

## Virtual tour of the Local Plan review

If you can't get to one of these sessions, don't worry, you can view a virtual exhibition online. This will allow you to see the proposals and approaches and explains how you can take part in the consultation: <https://chelmsford.vercel.app/>.

The full Local Plan document and more information is available [online on the Chelmsford City Council website](#).

<https://citylife.chelmsford.gov.uk/2022/09/23/local-plan-review-consultation-extended/>

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Chelmsford - Slow moving traffic on the Baddow Bypass (A1114) towards the Army & Navy roundabout

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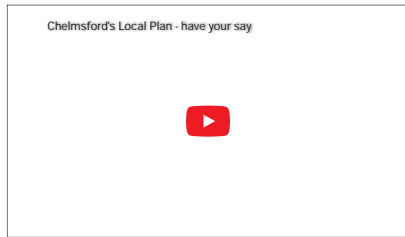
# Chelmsford's future! Deadline approaching

By **Charlotte Maltby**  
OCT 14, 2022

## Consultation closes this Thursday, 20 October

The planning team at Chelmsford has been gathering views from across the city since August. Chelmsford has to have a **Local Plan** to guide future growth. We are reviewing the adopted Local Plan to ensure it remains up to date and continues to meet the changing needs of our residents.

**Our planners are urging residents: don't miss out on the last few days to have your say – it's your chance to help shape plans for your city's future!**



## Views will feed into evolving plan

One of the routes for feedback was a webinar held this week. Affordable housing, changing housing needs and sustainable transport infrastructure were some of the issues very much on people's minds. You can read points raised and responses here <https://www.chelmsford.gov.uk/media/232mjkl/issues-and-options-faq.pdf>

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Chel... @C... 1m

Over the weekend @ChelmsTheatre hosted its first shows following a six-month refurbishment. We're thrilled to share the first photos of the stylish new front-of-house spaces

### Travel

Make sure you take the opportunity to have your say too. **But hurry – it's the last few days of the first stage of public consultation on the current review of the plan – it ends at 4pm this Thursday, 20 October!**

This won't be the only chance to have your say on Chelmsford's future, but it is an important one. The Local Plan is reviewed once every five years, so now is a crucial time. There will be further steps as the Local Plan evolves, but this is the time to share your views about how and where the city develops.



## Approaches for Chelmsford's future growth

The council has developed five different approaches that could be followed to address the city's growth. It is likely that the preferred approach might not be one of the five listed, but a combination of the most sustainable and deliverable elements.

The consultation is not a vote on which specific location is the most or least popular, but a way of assessing issues and finding the most sustainable overall strategy for delivering the area's needs. That includes our environment, infrastructure, business and education opportunities.

## Virtual tour of the Local Plan review

You can view a virtual exhibition that summarises the plan online. This will allow you to see the proposals and approaches and explains how you can take part in the consultation: <https://chelmsford.vercel.app/>

The full Local Plan document and more information is available online on the Chelmsford City Council website.

### Tweets from @Essex\_Travel

Essex T... @... - 24m

Chelmsford - Slow moving traffic on the Baddow Bypass (A1114) towards the Army & Navy roundabout



## Where to view documents

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By post to Spatial Planning Services, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE

All comments will be used to inform the next stage of the process which is when the council chooses its preferred option.



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By **Charlotte Maltby**  
Charlotte writes stories about recycling and waste, parks, economic development, local democracy and planning.

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## Review of Chelmsford's Local Plan - get involved!

Chelmsford City Council's Local Plan was adopted in 2020 and it currently guides growth and development across Chelmsford City Council's area to 2036.



It 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 Government requires that all councils review their Local Plan every five years, so the review needs to be complete by May 2025. The first consultation stage towards updating the adopted Local Plan is open now and runs until 6 October 2022.

The consultation document only identifies broad locations rather than specific boundaries for development. Does the "**Issues and Options consultation**" document identify new development around South Woodham Ferrers?

**Yes, it does!** North of South Woodham Ferrers is identified as a location as having the potential for 500 new homes in Spatial Approaches A, B, C and D.

### Where to view and comment on the documents?

All information on this consultation is available at: [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review)

### View and Comment online

You are encouraged to view and comment online, using a specially designed Consultation Portal. This helps record comments accurately so they can be processed quickly.

Go to [www.chelmsford.gov.uk/planningpolicyconsult](http://www.chelmsford.gov.uk/planningpolicyconsult)

### 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 (closed on bank holidays).

### Comment via email

Comments may be submitted by email: [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).

**Your Town Council will be making comments and also encourages residents to make their own comments directly to CHELMSFORD CITY COUNCIL.**

## South Woodham Focus 2 September 2022

### LOCAL PLAN ISSUES AND OPTIONS CONSULTATION

Local Plan Issues and Options Appendix 1 Policy Board 140722. A consultation has begun and residents are encouraged to read the consultation and take part. Please see link attached.

[Visit our website](https://focuspp.com) To view the documents from Chelmsford City Council.



<https://focuspp.com>

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Residents can also view a hard copy of the document from the Town Council office at Champions Manor Hall. A visual display will be placed in the foyer (date to be confirmed with Chelmsford city Council) and this will be advertised when available on our website and on social media.

**South Woodham Focus 16 September 2022**





# Review of Chelmsford Local Plan – Get Involved Now!

The Council is starting a review of its adopted Local Plan. We would like your views on the key issues facing Chelmsford and options for planning the City's future – including the amount and potential locations for new development of homes, jobs and infrastructure.

Chelmsford's Local Plan was adopted in 2020 and guides growth and development across Chelmsford City Council's area to 2036. We are reviewing it to identify land for further housing, schools, shops and jobs as well as areas for protection, such as open space and sites important for wildlife, up until 2041.



## Have Your Say!

**The Issues and Options Consultation runs from 10am on Thursday 11 August 2022 until 4pm on Thursday 6 October 2022.**

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 is an online exhibition available during the consultation period – this can be found at [www.chelmsford.gov.uk/lp-exhibition](http://www.chelmsford.gov.uk/lp-exhibition).

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.

**Visit an exhibition:**

Thursday 8th September 2022	Civic Centre	6pm - 9pm
Friday 9th September 2022	Civic Centre	10am - 1pm
Friday 9th September 2022	Civic Centre	2pm - 5pm
Saturday 10th September 2022	Civic Centre	10am - 1pm

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



Chelmsford City Council  
August 11 at 12:07 PM · 🌐

What will #Chelmsford look like in 20 years' time?  
👉It's your city and now is the time to have your say👈  
We're looking at the Local Plan which will guide:... See more



Chelmsford City Council  
22h · 🌐

👉Don't miss your chance to have a say on #Chelmsford's future👈  
📅The consultation period on the Local Plan review has been extended  
📅We also have new dates for our drop-in sessions, when you can discuss proposals in the plan.  
📅Or you can visit the virtual exhibition which outlines proposals for the next 20 years.  
👉Read more here:

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CITYLIFE.CHELMFORD.GOV.UK  
**Local Plan review consultation extended**  
The consultation period for the review has been extended until 20 October 2024

Chelmsford City Council  
4h · 🌐

Speak to us about plans for Chelmsford @  
8-10 September

Come to the Civic Centre this week to talk about #Chelmsford's future. We're holding four sessions and it's your chance to see an exhibition and discuss proposals included in our Local Plan review which will guide the city's growth to 2041 and where future development will happen...  
See more

CITYLIFE.CHELMFORD.GOV.UK  
**Open house about Chelmsford's future**  
Now is your chance to speak to the team who are reviewing proposals for Chelmsford's future ...



Chelmsford City Council @ChelmsCouncil · Aug 12

👉Did you know that how #Chelmsford develops in the next 20 years could be influenced by you?

A consultation on the next phase of our Local Plan is running until 6 October and it's really important to have your say 📅

Find out more 📄



youtube.com  
Chelmsford's Local Plan - have your say  
Did you know that a lot of how Chelmsford develops in the next 20 years could be influenced by you? ...

2 comments · 2 shares · 2 likes



Chelmsford City Council @ChelmsCouncil · Aug 12

Information about how to take part can be found at [chelmsford.gov.uk/ip-review](https://chelmsford.gov.uk/ip-review)

📅 Please remember that only comments made via the official consultation can be accepted ✅

📅 Comments on social media cannot be considered ❌

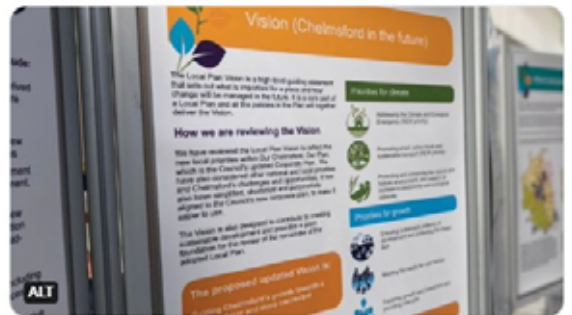
1 comment · 1 share · 1 like



Chelmsford City Council @ChelmsCouncil · Sep 16

1/3  
Owing to the period of national mourning for Her Majesty the Queen, our Local Plan review consultation has been extended.

The deadline to take part in the consultation is now 20 October.



1 comment · 1 share · 1 like



Chelmsford City Council @ChelmsCouncil · Sep 16

2/3  
Drop-in sessions due to take place on 9 and 10 September have been rescheduled.

We will now be holding sessions on 7 and 8 October at the Civic Centre where you'll be able to see an exhibition of the Local Plan review, talk to planners and ask questions.

1 comment · 1 share · 1 like



Chelmsford City Council @ChelmsCouncil · Sep 16

3/3  
There is no need to book, just come along to the Civic Centre: [chelmsford.gov.uk/.../getting-to-...](https://chelmsford.gov.uk/.../getting-to-...)

You can find out more about the Local Plan review and visit a virtual exhibition on the council website: [chelmsford.gov.uk/.../local-plan-...](https://chelmsford.gov.uk/.../local-plan-...)

1 comment · 1 share · 1 like

# Local Plan Review Newsletter

NUMBER 1 August 2022

## What is a Local Plan?

The Local Plan will shape 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?

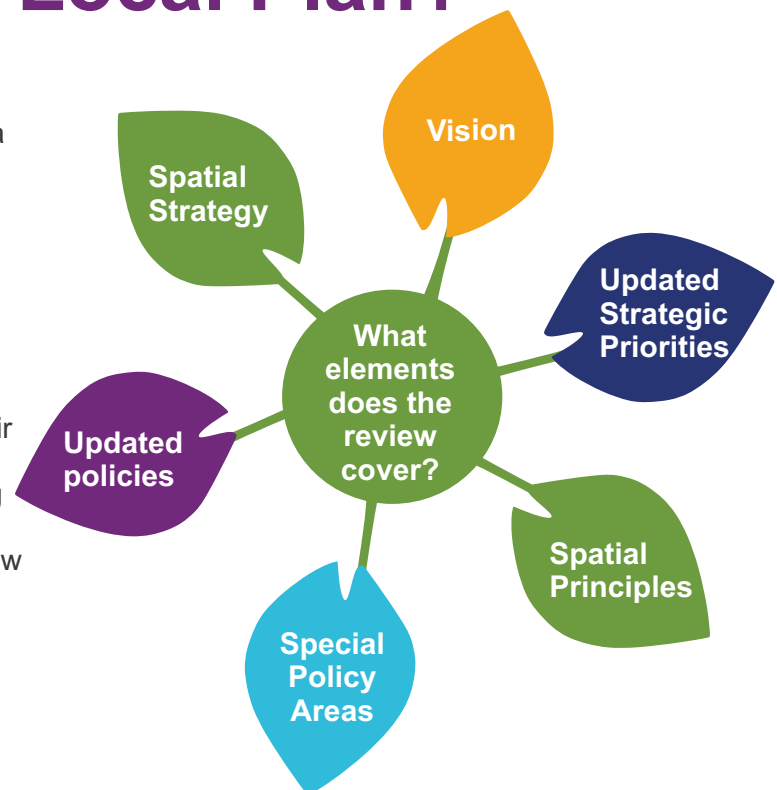
The Government requires all councils to review their Local Plan every five years. This will ensure that it remains up to date and continues to meet changing needs of our current and future residents. As we adopted the Local Plan in May 2020, we must review it by May 2025 and so the process is starting now.

This consultation, known as Issues and Options, is the first stage towards updating the adopted Local Plan and provides a starting point for engagement with our communities.

### What is included in the consultation?

The main areas we are consulting on are:

- Updated draft Strategic Priorities
- New draft Vision
- The approach to future development numbers, including homes and jobs
- Spatial Strategy Approaches for accommodating additional future growth to 2041
- The approach to reviewing our planning policies.



We think that many parts of the adopted Local Plan and its policies are still up to date and generally performing well, so may require no or only partial changes. Other parts, however, will need updating alongside additional new policies that are required to reflect the latest national planning policy requirements, the Council's latest ambitions and aspirations and to meet new development growth to 2041. Therefore, the review process is expected to result in changes to the adopted Local Plan – but we are not working on a completely new plan from scratch. It is also not a reopening of any debates about already allocated sites.



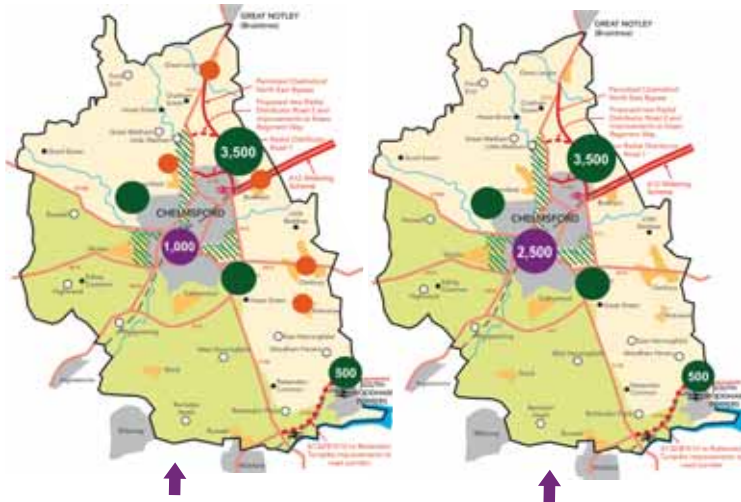


## What are the Spatial Strategy Approaches?

In reviewing the Local Plan, we propose to accommodate the growth needed until 2041. The consultation proposes we plan for an additional 7,966 homes over and above those allocated in the adopted plan - 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.

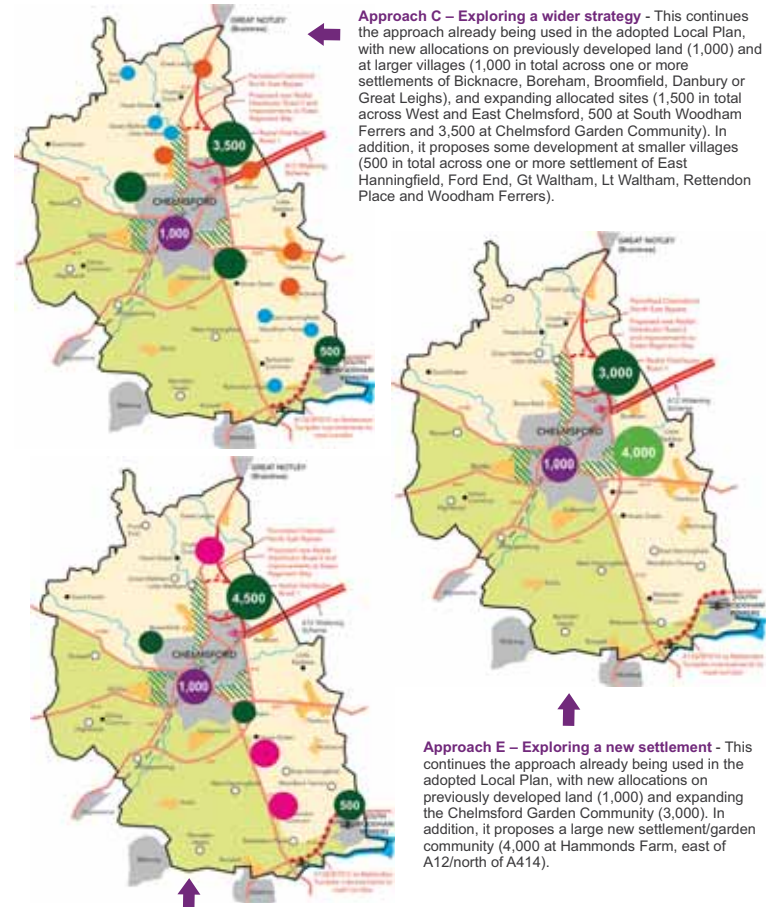
The consultation document sets out five approaches for accommodating the additional development growth needed. The approaches all set out the same amount of development overall, but use different elements of the locations for potential growth, which could also include new employment development. We are not considering growth in the Green Belt, which is the light green shading on the plans below.

This consultation does not identify any preferred options or specific development sites. The preferred approach will be informed by the outcome of this consultation and future evidence gathering.



**Approach A – Growing the existing strategy** - This continues the approach already being used in the adopted Local Plan, with new allocations on previously developed land (1,000) and at larger villages (1,500 in total across one or more of the settlements of Bicknacre, Boreham, Broomfield, Danbury or Great Leighs) and expanding allocated sites (1,500 in total across West and East Chelmsford, 500 at South Woodham Ferrers and 3,500 at Chelmsford Garden Community).

**Approach B – Concentrating growth in urban areas** - This continues the approach already being used in the adopted Local Plan, but maximises development in the City Centre and urban area (2,500) and expands allocated sites (1,500 in total across West and East Chelmsford, 500 at South Woodham Ferrers and 3,500 at Chelmsford Garden Community).



**Approach C – Exploring a wider strategy** - This continues the approach already being used in the adopted Local Plan, with new allocations on previously developed land (1,000) and at larger villages (1,000 in total across one or more settlements of Bicknacre, Boreham, Broomfield, Danbury or Great Leighs), and expanding allocated sites (1,500 in total across West and East Chelmsford, 500 at South Woodham Ferrers and 3,500 at Chelmsford Garden Community). In addition, it proposes some development at smaller villages (500 in total across one or more settlement of East Hanningfield, Ford End, Gt Waltham, Lt Waltham, Rettendon Place and Woodham Ferrers).

**Approach E – Exploring a new settlement** - This continues the approach already being used in the adopted Local Plan, with new allocations on previously developed land (1,000) and expanding the Chelmsford Garden Community (3,000). In addition, it proposes a large new settlement/garden community (4,000 at Hammonds Farm, east of A12/north of A414).

**Approach D – Exploring growth along transport corridors** - This continues the approach already being used in the adopted Local Plan, with new allocations on previously developed land (1,000), expanding allocated sites (500 in total across West and East Chelmsford, and 500 at South Woodham Ferrers), and maximising growth at Chelmsford Garden Community (4,500). In addition, it proposes some growth along main transport corridors (1,500 in total across one or more settlement of Chatham Green, Howe Green and Rettendon Common).

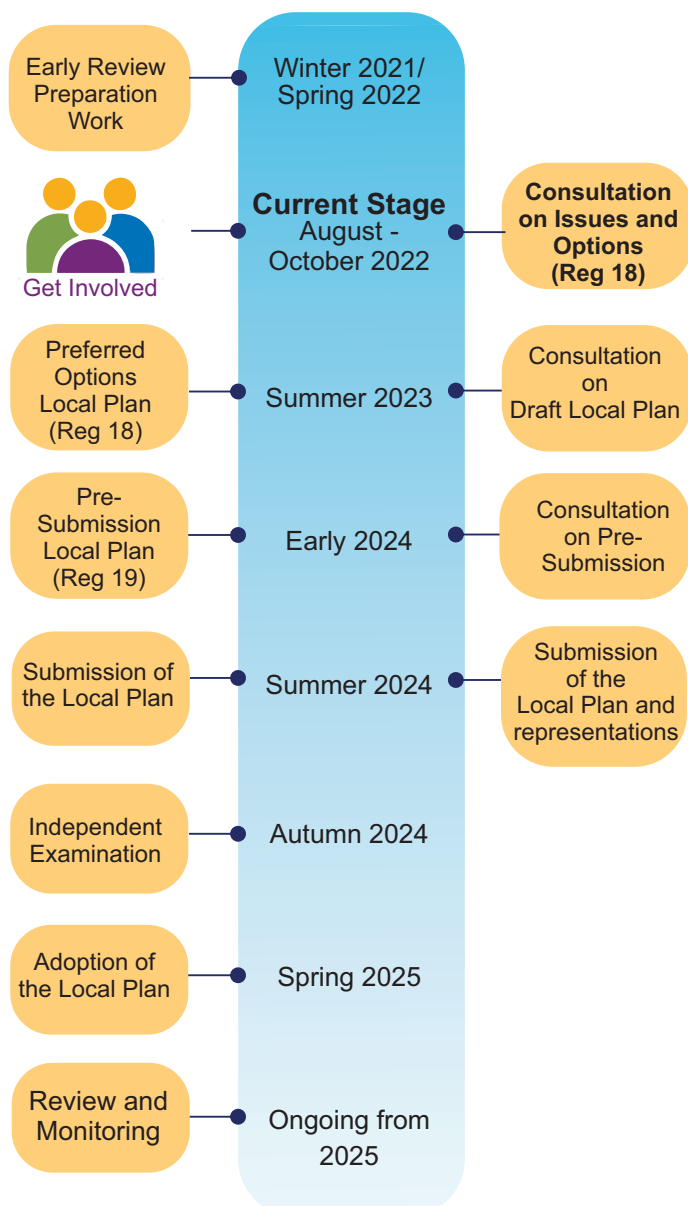
## What is the Integrated Impact Assessment (IIA)?

The IIA identifies the key sustainability issues for the review of the Local Plan. These feed into a framework against which the proposals will be assessed. It will cover the potential environmental, social, economic and health performance of the Local Plan and any reasonable alternatives. The IIA will assess the following aspects of sustainable development:

- 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 Issues and 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 the Council's planning policy consultation portal

[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 is an online exhibition available during the consultation period – this can be found at [www.chelmsford.gov.uk/lp-exhibition](http://www.chelmsford.gov.uk/lp-exhibition).

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.

In-person exhibition dates are:

- Thursday 8th Sept 6pm – 9pm
- Friday 9th Sept 10am – 1pm
- Friday 9th Sept 2pm - 5pm
- Saturday 10th Sept 10am – 1pm

## Have Your Say

### Consultation dates and how to have your say

The consultation on the Issues and Options document runs for an extended period of eight weeks from 10am on Thursday 11 August to 4pm on Thursday 6 October 2022.

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.

All comments will be used to inform the next stage of the process, the Preferred Options Review Plan.



This publication is available in alternative formats including large print, audio and other languages

Please call 01245 606330

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