

## BROOMFIELD PARISH COUNCIL

A meeting of Broomfield Parish Council's Property & Planning Committee was held on Wednesday 20<sup>th</sup> January 2016 in the Parish Office, Broomfield Village Hall at 7.30 p.m.

**Members' Present** Chairman Cllr J Blake  
Councillors: Carter, Garwood, Smith & Thomson

**Also Present:** Councillors Tranquada & Howell *Hubble JEMB*  
Mrs K Hurrell - Clerk  
One member of public

**Public Question Time:** Advice will be given to Mr Catley after the meeting with regards to submitting his consultation questionnaire.

**345. Apologies for absence**  
Apologies were received from Councillor Jones.

**346. Declarations of Interest**  
No declarations were made.

**347. To approve minutes of Property & Planning Committee Meeting held on 6<sup>th</sup> January 2016**  
It was resolved to approve the minutes and they were duly signed by the Chairman.

**348. Chelmsford Local Plan – Issue and Option Consultation Document - to finalise the Parish Council's response**

A draft response had been circulated, along with comments from the 'Save Broomfield' Open Day.

The attached draft was considered (with attachments) and agreed with the following amendment: *matters raised by Cllr Carter*

*JEMB* Question 24, penultimate paragraph. Delete: 'Additional dwellings' and replace with: 'More accommodation for older people (which can achieve greater density within the same footprint) ...'

In addition, it was agreed that the Chairman would:-

- a) read through the whole response and make any minor changes needed to make the response clearer/more effective (including remaining points raised by the planning consultant)
- b) if time, add responses to the minor questions on facts and figures, vision and infrastructure to the effect that the Issues and Options Document lacked fresh vision and was essentially a continuation of existing strategy.

**349. To receive update on various matters from the Chairman**  
No further information was reported upon.

Signed: *J. Blake*

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Dated: *3 Feb 2016*

Attachment to Planning Committee Minutes 20<sup>th</sup> January 2016:

**Chelmsford Local Plan – Issue and Option Consultation Document  
Broomfield Parish Council DRAFT Response:**

**Question 4**

**Do you have any comments on how the Council has calculated its Objectively Assessed Housing need? Please explain your answer. Where possible, please support your answer with reference to any evidence.**

The Parish Council's comments and concerns are set out in relation to question 5 and the overall housing number which is being used for testing in this version of the Issues and Options. The means of establishing and testing the Objectively Assessed Housing Need figure has been undertaken under standard guidance and in accordance with established practice. However, there are areas of concern; for example, at 5.14, there is a recognition that further work needs to be undertaken to assess the affordable housing requirement; it is considered that this work needs to be undertaken in order to define this need and the housing numbers refined in this context. Furthermore, although a robust approach is taken in applying a 20% uplift, the requirement for this is questionable in the context where an uplift is already applied to allow for potential employment uplift. The combination of this results in a significant increase in the housing number being assessed and impacts upon the spatial requirements to fulfil these needs. The housing numbers need to be refined therefore to adequately establish whether the spatial options are appropriate.

**Question 5**

**Do you have any comments on the housing number (930 homes per year) used for testing in this consultation? Please explain your answer. Where possible, please support your answer with reference to any evidence.**

The Parish Council has four main concerns:

- a) The lack of data for affordable housing need; and the use of the 20% buffer

As outlined in para.s 5.14 and 5.16, the City Council does not have robust data to set an affordable housing target. In this context, it cannot be known what provision is needed to meet the affordable housing requirement in the area. The Council has set a blanket 20% uplift to the OAHN figure to enable to proceed with testing the Spatial Options regardless of the lack of data in relation to the affordable housing requirement.

The NPPF gives broad guidance to Councils in calculating housing need and states that "an extra 5% should be added to "ensure choice and competition in

the market for land" and that this should be increased to 20% in certain circumstances.

The Parish Council considers this 20% uplift unsatisfactory. It is possible that when the affordable housing target is available, it may result in no significant extra provision being required i.e. an annual target of around 775 dpa being acceptable to meet the affordable need. Alternatively, it could be above the 20% uplift i.e. above 930 dpa, in which case the Plan will not have adequately identified land for the delivery of the full housing need.

Consultation on the spatial options should not have begun until the data on affordable housing need had been clarified. The 20% uplift is significant (as stated in para. 5.16) but it is not robust, as it is merely an assumption (albeit an accepted figure in planning guidance). There are obvious dangers for the value of the consultation if the eventual housing figure is higher than 930 dpa, but no less significant dangers if it is close to 775 dpa. It should not be assumed that the same Spatial Options are appropriate for 775 dpa as 930 dpa.

The City Council will need to consult again if the final housing figure is found to be significantly higher or lower as a result of this further work. Another consultation would clearly be required in the housing figure were the rise above 930, but should also be required in it fell below 830, as that would be significantly lower than the housing number tested in the Document. It would not be acceptable to proceed to the Preferred Options Stage without further consultation, by for instance simply reducing all the location figures pro rata or by deleting one location entirely and leaving the rest unchanged. The Preferred Options debate would then be framed by a misguided Issues and Options Consultation.

b) Deliverability of 930 dpa

The Parish Council also questions if this target is realistic or achievable. Evidence shows that the delivery of the planning targets 2001/2021 have been significantly underachieved to date, with an average of 525 dpa since 2001. The shortfall is unlikely to be made up by 2021, even if delivery is above target for the rest of the planning cycle. Whilst this shortfall is recognised as being in large measure due to the economic downturn from 2008, there is no guarantee (or even likelihood) that the economy will remain stable from 2021 – 2036 and therefore that delivery rates will rise and remain at a level which would fulfil this shortfall.

Whilst there is no evidence that delivery will fall below 800dpa -for some of the remaining years up to 2021, this reflects 2 significant factors:

- a) Catch up, as developers are willing to make up some of the lost ground during the recession.
- b) The fact that significant greenfield development in North Chelmsford is coming online. This was always expected to create higher delivery rates for a finite period, which would then tail off as the North Chelmsford sites were delivered (albeit that the Core Strategy expected this to happen earlier in the planning period).

We consider that the rate of delivery achieved up to 2021 should not be taken as typical of what the development industry in Chelmsford can achieve. Therefore the Parish Council concludes that there is no realistic prospect of an average of 930 dpa being achieved consistently between 2021 and 2036. Planning guidance states: 'A Local Plan is an opportunity for the local planning authority to set out a positive vision for the area, but the plan should also be realistic about what can be achieved and when...' and we do not consider that there is evidence to show that this guidance is or can be fulfilled in this context.

c) Severe impact of 930 dpa on the environment.

Whilst the Document proports to offer three spatial options, these essentially boil down to one option with some small variations in terms of housing numbers in particular locations. We conclude from this that the City Council is struggling to find appropriate developable land to offer more than effectively one main option. This too suggests that a figure of 930 dpa is too high or at least not deliverable.

The options put forward will have a significantly adverse impact on the environment and it is not considered that adequate consideration has been given to this through the landscape character assessment that currently supports this Issues and Options document. Specifically, sensitive landscape character areas such as the Writtle and Pleshey Farmland Plateaus are considered likely to suffer a huge adverse effect if the City Council sets a target as high as 930 dpa and seeks to achieve it using any of the 3 options proposed. The Pleshey Farmland Plateau in particular is noted *inter alia* for its 'strong sense of tranquillity' (Chelmsford Landscape Character Statement) and this could be destroyed west of Broomfield by the proposed development at Location 3 and by a potential western 'relief' road. Further details of the environmental damage that the Parish Council anticipates as a result of the growth model and options proposed is set out in our response to Question 15.

The Document proposes to retain Green Belt boundaries entirely. While Green Wedges boundaries are to be reviewed, the spatial option maps indicate that the overall extent of green wedge designations will increase considerably so that together, green belt and proposed green wedges appear on the spatial options maps to account a very significant proportion of the City area. We believe it is impossible to pursue a high housing target of 930 dpa whilst retaining such broad areas of green belt/wedge, without severely impacting landscape of high quality that does not benefit from this protective designation. Therefore either a lower housing target should be pursued or the boundaries of existing ~~and~~ proposed green wedges and green belt must be reexamined with a view to releasing more sustainable land for developemnt.

d) Impact of 930 dpa on infrastructure.

Despite warm words in various places in the Document about the importance of infrastructure and its importance in achieving delivery of sustainable growth and despite some ambitious indicative infrastructure requirements, there is no strategy identified for achieving the long-awaited North-East Bypass, which, despite the route having been defined and identified in the Plan, is understood

to require funding of circa £250 – 300M which is not believed to be in place or planned

We understand that there is almost certainly no prospect of the recently-introduced spectre of a North-West Bypass being achieved within the 2021/36 planning period, even if funding were available. Apart from the infrastructure directly associated with individual development sites (e.g. access roads, schools and utilities), it is clear that development between 2021 and 2036 will largely need to be supported by existing infrastructure and it is not clear from the Plan that the level of growth anticipated will be achievable on this basis (even if the spatial options were better aligned with existing/planned infrastructure such as the A12/a130 and the new station at the Boreham Interchange).

The lack of new significant infrastructure to be brought about through the Local Plan in the later period 2021/36 is therefore a further reason for the need to adopt a realistic housing target. Again, Planning Guidance states that: 'A Local Plan is an opportunity for the local planning authority to set out a positive vision for the area, but the plan should also be realistic about what can be achieved and when (including in relation to infrastructure).'

**In conclusion**, the Parish Council questions both the appropriateness of consulting on a housing target that has yet to be clarified; and the ability of the necessary stakeholders within the City area to achieve a high figure of 930 dpa. It therefore urges the City Council to prepare and examine the further data in terms of affordable housing and the impact in terms of housing numbers as soon as it is available; and then to consult on how to achieve a figure which reflects the true level of housing need. The Parish Council hope that this number will be close to the OAHN figure of 775 dpa.

#### **Question 6**

**Do you have any comments on how the new Local Plan could meet the accommodation needs of Travellers?**

No comment.

#### **Question 7**

**Do you have any comments on how the Council has calculated its job requirement number? Please explain your answer. Where possible, please support your answer with reference to any evidence.**

No comment.

#### **Question 8**

**Do you have any comments on the job requirement number (887 jobs per year ) used for testing in this consultation? Please explain your answer. Where possible, please support your answer with reference to any evidence.**

No comment

**Question 9**

**Do you have any comments on how the Council has calculated its retail capacity forecasts? Please explain your answer. Where possible, please support your answer with reference to any evidence.**

No comment.

**Question 10**

**Do you have any comments on the retail floorspace requirements used for testing in this consultation? Please explain your answer. Where possible, please support your answer with reference to any evidence.**

No comment

**Question 11**

**Do you have any comments on how the Council has calculated its office need forecasts? Please explain your answer. Where possible, please support your answer with reference to any evidence.**

No comment.

**Question 12**

**Do you have any comments on the office floorspace requirements used for testing in this consultation? Please explain your answer. Where possible, please support your answer with reference to any evidence.**

No comment

**Question 13**

**Do you think that we have missed any issues related to future employment and economic development to be addressed in the new Local Plan?**

**If yes, please explain why. Where possible, please support your answer with reference to any evidence.**

No comment.

## Question 14

**Do you think that we have missed any issues related to highways, transportation and accessibility to be addressed in the new Local Plan? If yes, please explain why. Where possible, please support your answer with reference to any evidence.**

### Background

Transport and accessibility are already a major issue facing Chelmsford. Essex County Council (the Highways Authority) suggests that Chelmsford's major routes are already at 94% capacity. This is mirrored in local perceptions: the Broomfield Parish Plan indicated that the traffic is the only significant dislike about living in Broomfield:

- 82% of respondents disliked/disliked a lot the current level of traffic
- 58% felt the level of traffic through Broomfield is too heavy all the time and a further 36% felt it to be high at peak times
- 91% were concerned or very concerned that expansion of Broomfield Hospital (an out of town general Hospital on an isolation hospital site) would make traffic in Broomfield worse.

Despite a well-established recognition of these problems (the Broomfield Parish Plan was published in 2005 and a study of the Broomfield Traffic Corridor was conducted by Mouchel for the County Council in 2007), very little has been achieved in concrete terms to address this important issue.

The Parish Council believes this section (para.s 5.42 to 5.53 - less than 2.5 pages) is inadequate and fails to even recognise the scale of the problem. It appears to mainly cut and paste sections of a recent press release by the Highways Authority (November 2015), which is itself simply a statement of good intent of how it would like to resolve transport issues.

Whilst noting both the problems (para 5.44), the need for Local Plans to promote sustainable transport (para. 5.42) and for 'innovative transport measures' (para.5.44), the Document fails to indicate how any significant improvements will be achieved or identify and propose any truly sustainable transport measures. The Plan and the solutions therein not only remain heavily car-based, which is not considered to be a truly sustainable solution to the traffic problems, but also lacks substance in terms of the delivery of the highways improvements needed to support the identified level of growth.

The language of para.s 5.45 – 53 is entirely in terms of aspiration, intent and vision (e.g. the desire to 'become the best in class' para.5), 'develop long term solutions' (para. 5.46) and 'encourage trips originating within Chelmsford to be made by sustainable modes' (Table 3, para.5.47).

The key flaw of this section is it implies by its hopeful tone that these expressions of intent will solve the transport issues of west Chelmsford and that the level of development proposed for west and north Chelmsford can proceed regardless. The Parish Council believes this is unacceptably weak for such an important section of such a highly significant Document.

The Parish Council believes that in the absence of any evidenced or concrete measures to reduce traffic levels in central and west Chelmsford, the only position open to the City Council between 2021 and 2036 is to reduce the need for car journeys into central Chelmsford and pursue development policies to support this approach as far as possible. The lack of a clear spatial option to explore the promotion of more 2021/36 development within walking and cycling distance of the new rail station and along the A12 corridor is therefore a key omission, as any such strategy would considerably assist in improving the sustainability of travel in this area, by building upon the use of transport measures which are already secured.. The reasons for such an option and further details are outlined in our answer to Q z

#### Specific Areas of Oversight/ Potential Solutions – the Chelmsford North-East Bypass (Boreham Interchange to Great Leighs)

This key link in the outer London orbital network was promoted in the preferred option document of the current Core Strategy as an essential infrastructure requirement to support development in North-East Chelmsford in the current planning period up to 2021 . Despite having been identified as a solution some years ago to the delivery of development in this area, it has not been delivered and the project still requires £250 – 300M to be completed. The Document fails to make any reference as to how this might be achieved as part of a Strategy for 2021 – 2036. This is a failing which the Parish Council believes to be critical in terms of the transport strategy of this Plan.

Nonetheless, despite the lack of certainty in terms of the timing and funding for the delivery of this infrastructure, the NE Bypass is used to underpin further development of up to 3,000 homes in North-East Chelmsford (at Little Waltham). e.g. in Table 7, page 58. At the same time, the use of the word 'Indicative' in terms of the transport requirements to deliver this development suggests the City Council believes that this development could proceed regardless of whether the Bypass is constructed or not. The document should show greater precision and transparency as to whether the North-East Bypass is a required piece of infrastructure for further development North Chelmsford or not in order to demonstrate the robustness of the Plan.

The Parish Council's position is that the North-East Bypass is an essential piece of infrastructure that would bring benefits to the strategic road network to north-east Chelmsford and north-west Chelmsford, by allowing Essex Regiment Way (A130) to evolve towards a more local function, which would include it's taking through traffic that currently uses Main Road, Broomfield (B1008). The Parish Council would like to see concrete proposals for achieving this route in the Preferred Options Document.

As mentioned in our response to Question 26, this strategy would justify an intense focus on maximising the development potential of the Park Farm/Boreham Airfield area if it may help to facilitate the NE Bypass through the contribution of adjacent development.

#### Specific Areas of Oversight/ Potential Solutions – the Likelihood of Achieving a West Relief Road in 2021/36



The Parish Council is concerned that the prospect of a potential north-west relief road will dilute the chances of achieving the North-East Bypass in the next Plan period, both by diluting the effectiveness of developer contributions and the energy, focus and political will to achieve its delivery.

The Parish Council understands that planning for a potential north-west relief road has only just begun, in the response to the City Council's options, set out in this consultation draft Plan, to place significant weight on the delivery of development north of Writtle and north/west of Broomfield. This development is ultimately heavily reliant upon the delivery of the north-west relief road to achieve its future success. However, given the very early stages of considering this road, it is highly unlikely to be constructed in the next Plan period 2021/36 and, depending on funding, possibly not until long after 2036.

Nonetheless, the Document includes it within the section entitled 'Indicative Infrastructure Requirements' (e.g., table 6, page 55) for the proposed development at Location 2 and 3 (West Chelmsford and North Chelmsford/Broomfield). This is highly misleading, as it implies that development in these areas might be mitigated in the Plan period under consideration by a key piece of infrastructure, for which there is no evidence.

Broomfield, Chignal and Little Waltham Parish Councils have commissioned their own study of the effectiveness of a north-west relief road, which is understood to show that such a road is unlikely to have any benefits for North Chelmsford. Further details are given in our Response to Question 24.

As the value of a western relief road is unproven and is almost certainly unachievable in 2021/36, the Parish Council urges the City Council to remove it as an item of potential infrastructure to support the forthcoming Local Plan 2021/36 and to reconsider the impact that this has on the options for growth which are put forward (both in terms of location and scale).

Specific Areas of Oversight/ Potential Solutions – A more sustainable solution: The opportunity to provide more homes within walking and cycling distance of the new railway station

The Parish Council understands that housing delayed from the current 2001/2021 planning period is likely to be delivered in the period after 2021. However, the role of the Issues and Consultation Document is to look at the period 2021-36 on its own merits. It is therefore a significant omission that there is no option that includes housing within walking and cycling distance of the new station and the proposed Park and Ride at the Boreham Interchange in this Plan period. There is no evidence that the land needed for such development is not potentially available, suitable and achievable. The closest location which would fulfil this objective (Location 10, Boreham) is on the opposite side of the village of Boreham to the station and only features in Option 3. This is an oversight and does not result in a robust and sustainable proposal.

We understand that a potential justification for Location 2 (West of Chelmsford) is its proximity to Chelmsford station 'as the crow flies': the closest dwelling would be a mile from the station, though of course much of this large development would be closer to 2 miles distance. There are two

significant concerns with this; firstly that even one mile is beyond the distance most people are prepared to walk and that the proposal results in a requirement for the delivery of cycle routes to achieve the sustainable delivery and accessibility of this development, however, it is far from clear in what way safe cycle ways can be established in this already built up area and as to how the necessary 'step change' into this means of transport will be achieved. However, if this approach is accepted, it is therefore considered that there is no reason as to why this Document does not apply the same logic to the delivery of development around the new railway station, where there is significant greenfield land within a mile 'as the crow flies'. Whilst there may be other local factors, these are not explained in the Document, and this option should not have been discounted before Issues and Options stage.

Further, the Document seems at odds with new national planning guidance, published in December 2015, advising planning authorities to consider higher density development at commuter hubs. This notes:

"Para. 14. There are significant benefits to encouraging development around new and existing commuter hubs - reducing travel distances by private transport, making effective use of private and public sector land in sustainable locations....."

Para. 15. "We are proposing a change to national planning policy that would expect local planning authorities, in both plan-making and in taking planning decisions, to require higher density development around commuter hubs wherever feasible."

It is therefore considered that an option which took a more robust approach in terms of the delivery and density of development in proximity to established and certain infrastructure, such as the north east bypass and the rail station at Boreham.

## **Question 15**

**Do you think that we have missed any issues related to protecting the environment to be addressed in the new Local Plan?**

**If yes, please explain why. Where possible, please support your answer with reference to any evidence.**

There are a number of omissions:

### **1. Agricultural Land**

Despite the Classification Map (Figure 9, p.18) in the Facts and Figures section of the Plan, which sets out the Agricultural Land classification of the Borough, the Plan does not seem to demonstrate an awareness of its relationship to the Environment and the impact of development on the higher ranking areas of classification. The NPPF, para 112 states:

“Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.”

This is a key omission, which seems to be reflected throughout the document since no account of the higher quality of farmland to the north and west of the City (Grade 2) compared to the lower quality of farmland to the south (Grades 3 and 4) seems to have been taken in formulating the Spatial Options and selection sites and locations.

### **2. Green Wedge**

The Parish Council does not oppose this policy or even some extensions to the Green Wedges in particular locations but believes that current designations/boundaries are not sustainable in their current form, because:

- Given the increased pressure for development land to be released to fulfil housing needs and the City Council's desire to maintain the existing Green Belt boundaries, it is not realistic to maintain the green wedge existing boundaries and promote significant new tracts, without impacting on valuable landscapes and habitats elsewhere. The Council's decision to take this approach of protecting and retaining the Green Wedges, without considering their true value and the wider impact of this, in the same manner as in relation to Green Belt land, is compounding this issue.
- Green wedge boundaries therefore need to be drawn more tightly around landscapes that merit specific protection on a more evidenced basis – simply being a river valley is not sufficient and further evidence should be set out in this regard to justify this approach.
- It is unclear why only river valleys should be eligible for green wedge status. Arguably landscapes and biodiversity in areas of high flood risk enjoy *de facto* protection anyway, so further policy protection is less

necessary

- We suggest that additional green wedges could be designated within strategic tracts of other land of landscape quality which are threatened from development. This would prevent the need for a further policy designation of 'green buffers'. For instance, in Broomfield the landscape that provides separation between the Chelmsford and Broomfield settlement areas (Felsted Field) could merit such designation on both landscape and biodiversity grounds.
- The value of Green wedges in terms of 'amenity and recreation' (para 5.56) needs to be promoted and monitored in the context of any designation. For example, in the Parish of Broomfield, there has been no increase in access to or recreational use of the Chelmer river valley since designation, large parts of which remain inaccessible to the public. This is not considered to fulfil the intention of the designation.

### **3. Importance of Landscape Character and Statements**

It is considered significant that the section on the Environment begins with policy designation (Green Belt and Green Wedge) rather than the value of landscapes (either for agriculture or landscape character) which should be the foundation stone of this section and the policies emanating from it. It is not clear as to whether and how the Consultation Draft Plan has considered the current Chelmsford (*et al.*) Landscape Character Assessment. There is no evidence as to how this document has influenced the selection of options and locations at this stage. Its only subsequent mention is in para. 6.43 in relation to evidence for discounting Hammond's Farm. This is somewhat ironic, since that section of the Assessment notes the need to 'enhance the screening of the A12', something which development at Hammonds Farm could help to achieve.

Whilst the additional landscape study at a more local scale (para 5.57) is welcome, the Parish Council fears it will be more about managing the negative impact on sensitive landscapes whose selection has already been predetermined without much reference to landscape character. To add value to the selection of competing sites and locations across the City area, the additional study must be completed at an early stage, not after the preferred options and locations have already been selected.

Finally, it is suggested that reference should be made to Community Landscape Character Statements/Assessments as a way of finding out which landscapes are important to the local community and why. For the Broomfield Community Landscape Character Statement, please go to: <http://www.broomfieldessex.org/bpc/parish-plan-vds.html> Where they exist, such documents should be used to inform the additional study and further stages of preparation of the Local Plan.

#### **Question 16**

**Necessary infrastructure will be needed to support development in the new Local Plan. Do you think that we have missed any issues?**

**If yes, please explain why. Where possible, please support your answer with reference to any evidence.**

To follow - brief

#### **Question 17**

**Do you agree with the proposed settlement hierarchy i.e. City or Town, Key Service Settlement, Service Settlement and Small Settlement?**

**If no, please explain why. Where possible, please support your answer with reference to any evidence.**

To follow - brief

#### **Question 18**

**Do you agree with the classification of individual settlements within the Settlement Hierarchy?**

**If no, please explain why. Where possible, please support your answer with reference to any evidence.**

To follow - brief

#### **Question 19**

**Do you support the proposed Spatial Principles?**

- **Maximise the use of brownfield land for development**
- **Continue the renewal of Chelmsford's City Centre and Urban Area**
- **Protect the Green Belt**
- **Locate development at well-connected sustainable locations**
- **Protect the river valleys by defining Green Wedges**
- **Respect the character of the existing settlement pattern including the potential designation of Green Buffers**
- **Protect the character and value of important landscapes, heritage and biodiversity**
- **Ensure new development is deliverable and can be built within the Plan period**
- **Ensure that new development is served by necessary infrastructure**

**If no, please explain your answer.**

The Parish Council supports most of the Spatial Principles but suggests some improvements and re-grouping to make them more clear and coherent, as follows (amended text is in italics):

#### ***Principles for Development:***

- **Continue the renewal of Chelmsford's City Centre, Urban Area *and the South Woodham Ferrers Urban Area***
- **Maximise the use of brownfield land for development**

- **Locate development at well-connected sustainable locations**
- **Ensure that new development is served by necessary infrastructure**
- **Ensure new development is deliverable and can be built within the Plan period**

***Principles for Protection:***

- **Respect the character of the existing settlement pattern including the potential designation of Green Buffers**
- **Protect the character and value of important landscapes, heritage and biodiversity, *including by defining Green Wedges where appropriate***
- **Protect the aims and purposes of the Green Belt**
- **Protect the intrinsic character and beauty of the Rural Area beyond the Green Belt**

Reasons for suggested changes:

1. Principles for Development/ Protection:  
To provide greater clarity and consistency.
2. Reference to South Woodham Ferrers:  
To recognise the importance/potential importance of the town of South Woodham Ferrers and the need of regeneration/expansion, in line with other references in the Document (e.g. Table 15, p.66).
3. Re-assignment of river valleys/green wedges principle to within broader landscape principle:  
River valleys may include important landscape character areas and landscapes of high quality, though this is not always the case. Equally landscapes of high quality and sensitivity are not necessarily in river valleys. The important point here is that important landscapes should where possible be protected and, in specific cases, this can be achieved by designation as a Green Wedge – particularly where designation will protect heritage and biodiversity. Large cities can be defined by surrounding ridges or plateaus as well as rivers, so this amendment would make the Green Wedge policy more flexible as a means for establishing settlement definition and appropriate corridors of green space.
4. Reference to 'aims and purposes' of Green Belt:  
Whilst recognising that there is no need to repeat the NPPF, including this wording brings the spatial principle of this Plan more in line with the NPPF guidance on Green Belts (NPPF para.s 79-81 in particular). By separating out the aims and purposes of Green Belt from specific boundaries, this would help to ensure its robustness in the long term.
5. Introduction of principle of the rural area beyond the Green Belt:  
The Plan recognises the importance of the rural areas beyond the Green Belt in general (as opposed to specific landscapes, heritage and biodiversity assets). However, this principle seeks to protect the rural area only in terms of its intrinsic character and beauty, in line with the

**NPPF and the current Core Strategy policy as amended by the Focused Review.**

## Question 20

How do you think that new development growth in Chelmsford should be provided in the new Local Plan?

### Option 1 - Urban Focus.

Focus all the development to locations adjacent or close to the City of Chelmsford and the towns of South Woodham Ferrers and Great Leighs (to the south of Braintree)

### Option 2 – Urban Focus and Growth on Key Transport Corridors.

Reduced growth at locations adjacent or close to the City of Chelmsford and the towns of South Woodham Ferrers and Great Leighs (to the south of Braintree) with the remaining development directed to key locations on the A130/A131 transport corridor

Option 3 – Urban Focus and Growth in Key Villages. Reduced growth at locations adjacent or close to the City of Chelmsford and the towns of South Woodham Ferrers and Great Leighs (to the south of Braintree) the remaining development directed to the key villages

None of the above

Please explain your response.

None of the above. The Parish Council believes the organisation of the 17 locations is unhelpful for the following reasons:

#### 1. Inconsistent Description and Rationale

The options are correctly described in that 2,500 dwellings are allocated to the centre of Chelmsford, but beyond this descriptions are confusing and the rationale unclear:

#### Option One – Urban Focus

This contains some urban extensions (Locations 2, 6 and possibly 4 – if one accepts that the urban edge will eventually reach to this location). However, Location 5 (an urban extension) is not included in this option.

Further, there are village extensions in this option, passing under the badge of urban extension:

- Location 3 – north and west of Broomfield suggests an extension to the village settlement boundary on the opposite side to the Chelmsford area. This location logically belongs to Option 3, with other village extensions. It seems similar to the smaller extension of Boreham village (location 10) proposed in Option 3.
- Location 7 – north and east of Great Leighs. This location is promoted as an urban extension to Braintree, but it is far from clear how this would function. It seems more like a village extension.



Option One is therefore a mixture of urban focus, some (but not all) urban extensions and selected village extensions. Fundamentally we disagree with this Option, but also believe that the description of it is inconsistent with what it would actually deliver, for the reasons set out.

#### Option Two – Urban Focus and Growth on Transport Corridors

This option does include all proposed urban extensions, but otherwise our comments on Option One apply. Our significant concern in relation to this Option is that the defined, 'Growth on Transport Corridors' appears to mean only selected transport corridors and it is not clear on what basis these particular corridors have been chosen, nor that they are the most suitable and sustainable transport corridors for growth, if this is indeed the preferred approach.

The glaring omission in this case is the key A12 transport corridor, where a significant number of sites are ranked in the Call for Sites Assessment Process as deliverable, available and achievable. A far more consistent approach to this theme of growth on transport corridors could therefore have been presented, had it suitably considered all of the potential transport corridors and in particular, had greater consideration been given to the delivery of growth on the eastern transport corridor, around the A12 (please see our response to Question 21 for further details). Furthermore, Locations 8 and 10 (Howe Green and Boreham) appear to be relevant to this approach and able to meet the criteria outlined in para. 6.24, yet are not included in this option as a result of the limited consideration given to growth in this area by this document, which is not considered to have been sufficiently justified nor supported by evidence.

#### Option Three – Urban Focus and growth in key villages

The rationale for and description of this option is the most accurate, though the details of how development would be distributed between the key villages is considered to be rather vague, even for this stage of Plan preparation, as is the necessity of including all the key villages.

The Parish Council therefore believes there is a lack of clear rationale behind the selection of locations for the options, particularly options one and two.

## **2. Lack of true 'options'**

Our fundamental concern in relation to this document is the lack of difference between the options presented, beyond the housing numbers which would be planned for in each case. For example, Options One and Two in particular are remarkably similar; 86% of the housing in Option One is also in Option Two, with just two additional locations providing any differentiation. 71.5% of the housing in Option One is also in Option Three.

This means that only about 18,000 dwellings feature in the 3 options. This compares with a total of x dwellings that could be yielded by sites assessed through the Strategic Land Availability Assessment/Call for Sites.

The Parish Council believes this represents an unacceptably low level of diversity for the Issues and Options stage. Whilst planning authorities might

well have misgivings about some options sketched out at this stage, this is quite reasonable and appropriate for this initial stage of the consultation process. We have found anecdotal evidence in Broomfield that the lack of diversity of the options is discouraging people from involvement in the consultation process, as it is seen as further evidence for the theory that 'the Council knows what it wants and it will do it anyway.' This has been hard to refute and mitigates against the City Council's desire (seen for instance in the Statement of Community Involvement) to involve as many residents as possible in meaningful consultation.

### **3. Lack of Conformity with the Spatial Principles**

All 3 options appear to be in contravention of some of the Spatial Principles:

#### Ensure the new development is served by necessary infrastructure

All 3 options 'would require significant infrastructure provision including the Chelmsford North-East Bypass and potentially a western relief road' (para.s 6.20, 6.25 and 6.30). More specifically, the tables detailing each location show that Locations 2 and 3 require: 'Connections to the strategic highway network – potential western relief road' whilst Locations 4 and 7 require the North-East Bypass and/or strategic highway improvements.

In all 3 options therefore, the City Council has selected sites that require between 9,500 (Option 1) and 6,250 (Option 3) that are dependent on 2 large items of infrastructure, both of which are unlikely to be provided in the Plan period. That excludes infrastructure such as highways improvements needed for other locations e.g. Location 6 (SWF) which may also be significant, though perhaps more achievable.

North-East Bypass: the Parish Council strongly supports the completion of the NE Bypass but understands funding of £250 – 300M is required to complete it. Unless the City Council is able to achieve faster development at Boreham Airfield (see our response to Question 26), we cannot see how this funding gap can be closed by 2036 let alone by 2021. The Document gives absolutely no clues, nor any strategy for achieving the necessary funding, which is a considerable omission in terms of providing any certainty in terms of delivery of the growth anticipated by this Plan.

Western relief road: the Parish Council understands that planning work on this potential route has only been in progress for a few months, as a result of the Issues and Options consultation and the inclusion of Locations 2 and 3. It has therefore not even been established if it will be feasible or beneficial – the Parish Council's own study has shown that it would be of no benefit north of the A1060 (see our response to Q24). Even if it is progressed, the planning lead-time would make it almost impossible to deliver by 2036. Even that assumes that funding would be available – in practise the road is likely to be achieved well after 2036, possibly never. Elsewhere in the document, para.6.42, the development of Boreham Airfield is ruled out on the basis that it will become fully available only after 2031. Therefore, a similar approach to risk management would surely rule out Locations 2 and 3 on the basis that essential infrastructure cannot be confidently delivered in the planning period.

This Plan does not therefore meet the requirements of national planning guidance, which clearly states that, "A Local Plan is an opportunity for the local planning authority to set out a positive vision for the area, but the plan should also be realistic about what can be achieved and when (including in relation to infrastructure). This means paying careful attention to providing an adequate supply of land, identifying what infrastructure is required and how it can be funded and brought on stream at the appropriate time." It states that the Plan should identify what infrastructure is required, how and when it should be delivered and funded and furthermore, that even for infrastructure required later in the Plan period, that, "where the deliverability of critical infrastructure is uncertain then the plan should address the consequences of this, including possible contingency arrangements and alternative strategies." Firstly, it is not considered that the deliverability of key infrastructure is adequately defined, nor that alternative options and contingencies have been identified in the event that this key infrastructure cannot be delivered as required to facilitate growth,

#### Ensure that new development is deliverable and can be built within the Plan period

Given the concerns in relation to the delivery of infrastructure to support growth, if the City Council was to amend the Plan proposals to adhere to the previous Spatial Principle so that development is only proposed where the necessary supporting infrastructure can be provided, the Plan will inevitably fall foul of this Principle, as a significant part of the necessary housing delivery (especially within the first 5 years of the Housing Trajectory) would be undeliverable.

It is clear from both these points that the City Council needs to look again at other locations that are listed in the document, especially those that are less reliant upon key significant transport infrastructure, which does not benefit from funding, for their delivery. These may include sites for example, which primarily require 'inter-urban bus service improvements' to enable development. The Plan should also look again at the suitability of potential locations that are achievable and deliverable without significant infrastructure requirements. In our response to Question 21, we propose an alternative strategy that addresses these problems.

#### Locate development at well-connected sustainable locations

The Parish Council strongly supports this Spatial Principle. However, it only seems to relate strongly to Locations 1 and 6, which are potentially close to railway stations, and possibly to Locations 4 and 5 which are adjacent to Park and Ride facilities. However, for further effective Park and Ride sites to be established, it is important to achieve bus lanes (as with the existing P&Rs) as well and this is not always possible.

It is obvious from the option maps, that the most well-connected sustainable location in the City area is the Boreham Interchange. Without undertaking any significant assessment of this location, it is clear that it lies at a major junction on the A12 with connections east, west and south and where the new station is now confidently expected to open in 2022. A further Park and Ride

is indicated in the next planning period 2021/36 and, at some point, it will be well-connected to the north by the North-East Bypass.

Whilst this well-connected sustainable location is a focus for development in the current planning period 2001/21 (and some of this development is likely to come on-stream only after 2021), it does not appear to have been taken into account for the new Local Plan period 2021/36. Land that could be developed to provide housing within walking and cycling distance of the new station does not appear to be under consideration; likewise further sites along the A12 corridor have not been considered which also might provide sustainable and deliverable locations for growth which have not been adequately considered in these options. Please see our response to Q21 for further details.

#### Protect the character and value of important landscapes heritage and diversity

The Document suggests that the policy of defining Green Wedges along river valleys would continue and be extended. The Parish Council is not against this policy in principle, but believes that the current boundaries of the Green Wedges are set too widely and without sufficient regard to the specific landscape value of each section of river valley. The Parish Council therefore believes that the green wedge policy is not sufficient by itself to demonstrate that the City has adhered to this Spatial Principle and considers that further analysis should be undertaken of the Green Wedges and evidence prepared in this regard to underpin this principle of the Plan.

Equally, the Document does not always give enough protection to the character and value of important landscape heritage and diversity, outside the Green Belt and Green Wedges. In part, this may be due to the large tracts of land that within the Green Belt, current Green Wedges and proposed Green Wedges, regardless of its character, value and importance. The pressure on other significant landscapes which serve the function of defining settlements and preventing coalescence is evident from the proposal to introduce Green Buffers. If the Green Wedge policy was applied more selectively and flexibly (i.e. not just to river valleys), it would surely be unnecessary to introduce a further category of landscape protection.

To be specific, the current options do not protect important areas of Pleshey Farmland Plateau at Location 3 and Writtle Farmland Plateau at Location 4 (which is also an area of special landscape value). Plateaus can be as important as rivers in defining settlement patterns – indeed many cities (for instance Sheffield) are defined by the high land around them rather than the rivers inside them. Broomfield village is another example, sitting on a gravel ridge which nestles comfortably between the higher Pleshey Farmland Plateau to the west and the Chelmer river valley to the east. This pattern will be destroyed by the proposals for Location 3 – especially at the higher level envisaged in Option 1. Further details are provided in our response to Questions 15 and 21.

It also seems odd that some areas of the Boreham Farmland Plateau are not being considered for development, given that the City Council's Landscape Character Statement states that this has lower sensitivity to change than the Pleshey Farmland Plateau and already has a reduced sense of tranquillity due to the noise of the A12, which spreads over a large area. It is true that

much of the Boreham Farmland Plateau is tied with gravel extraction for most of the next Plan period, but significant parts remain in the southern section around Boreham village. Only one potential location has been proposed (and only in Option 3), despite the proximity of good transport infrastructure.

**In conclusion**, the Parish Council strongly believes that all 3 current options are misguided because they are too similar to provide effective choice and public debate; because the rationale behind each one is not sufficiently clear or justified; and because they do not conform sufficiently to the Spatial Principles set out in Section 6. Of the three, option 3 is the lesser of the evils as it sets out a greater range of sites and performs slightly better in terms of infrastructure requirement and therefore deliverability. However none of the three is good enough, so the Parish Council urges the City Council to bring forward further Options, including a wider range and combination of sites which would represent a clear and true 'options' assessment,.

#### **Question 21**

**If you ticked 'None of the above', can you suggest any alternative or additional Options that should be considered in the new Local Plan? Where possible, please support your answer with reference to any evidence.**

In consultation with neighbouring parish councils, the Parish Council would like to see **an option based on encouraging sustainable development with access to public transport hubs which provides easy access to the established main arteries of the A12 and A130 (south of the A12).**

The rationale behind this option would be to focus as much 2021/36 development within a mile of existing stations and the planned station at the Boreham Interchange. It would therefore reduce the need for travel into the City Centre using the current congested routes. This strategy would also be underpinned by providing new or expanded communities along the A12/A130 corridor for commuters whose journeys need to be undertaken by car. This recognises that many journeys will inevitably be made using private vehicles, but again it avoids the need for these vehicles to travel through the City centre.

This option, at a high level, seems to reflect new national planning guidance, published in December 2015, advising planning authorities to consider higher density development at commuter hubs. This notes:

'Para. 14. There are significant benefits to encouraging development around new and existing commuter hubs - reducing travel distances by private transport, making effective use of private and public sector land in sustainable locations.....,

It also states, at Para. 15. 'We are proposing a change to national planning policy that would expect local planning authorities, in both plan-making and in taking planning decisions, to require higher density development around commuter hubs wherever feasible.'

This option would sit comfortably with some of the areas of search already identified in the document, namely:

Locations 1, 6, 9, 10 which are close to planned/existing stations, although 9 and 10 may need to be re-focused to specifically include areas within a mile of the relevant station.

Locations 5 and 8, although not close to stations, would be well situated for access to the A12/130 (9 and 10 could meet both criteria).

In addition, there are a number of sites not referred to in the Document which have been assessed as available, deliverable and achievable through the Call for Sites process that could support this option, particularly by providing good access to the A12/A130 corridor (and short bus transit to the new station at the Boreham Interchange). These are attached to our response to Question 23.

This option would avoid the need for less sustainable locations to be used, for instance some of the village locations included in option 3 and Locations 2 and 3, although it may still be appropriate to locate some development in these places to encourage organic growth, strengthen local facilities etc.

The Parish Council would also support an option which made greater use of the **Boreham Airfield site**, though we accept that this may not be possible before 2031 due to gravel extraction. In any event, it would be useful to see an option in outline based on this site for development from the early 2030s onwards as it would help to promote a longer-term vision going forward into the following plan period.

## **Question 22**

**Which location(s) do you support for new development growth in the new Local Plan? Please provide comments and references to any evidence to support your response**

**The Parish Council supports the following locations:**

- Location 1 – Chelmsford Urban Area
- Location 4 - North East Chelmsford
- Location 5 - East Chelmsford (East of Great Baddow)
- Location 6 - North South Woodham Ferrers
- Location 8 - Howe Green
- Location 9 - Rettendon Place
- Location 10 - Boreham
- Location 11 - Danbury
- Location 12 - Bicknacre
- Location 16 - East Hanningfield
- Location 17 - Woodham Ferrers

**The Parish Council opposes the following locations:**

Location 2 – West Chelmsford  
Location 3 – North Chelmsford (Broomfield)  
Location 13 - Ford End  
Location 14 - Great Waltham  
Location 15 - Little Waltham

**The Parish Council has no specific view on:**

Location 7 - Great Leighs

**Reasons for the Parish Council's opposition (where applicable):**

**Location 2 – West Chelmsford**

Infrastructure and Transport

Table 5 indicates the need for 'Strategic Pedestrian/cycle connectivity' and 'Bus-based transit and priority to provide connections to the City Centre.' These are critical details and not only is there no detail or indication of the means of achieving this in the Plan, it is difficult to see how they would work. Walking is straightforward but the distance to the City Centre and Station would be between 1 and 2 miles, so walking is unlikely to be a widespread method of transport.

It is difficult to see how bus or cycle lanes can be added along the full length of Roxwell Road and Rainsford Lane and they would be affected by the junction of Parkway and Rainsford Lane. Any change in priority here to facilitate east-west traffic from Location 2 would inevitably impact on the flow of traffic on Parkway, potentially causing problems back towards the Army and Navy.

Table 5 also indicates the need for 'Connections to the wider strategic network – Potential Western relief road'. Planning on such a road has only just started and it has yet to be established whether a western relief road would be feasible or beneficial. Even if so, it is likely to take the extent of the next Plan period to go through the strategic planning and attempting to secure funding. It is almost impossible for implementation to take place before 2036 (potentially much later, or never, depending on funding). Therefore, Spatial Principle 9 (To ensure new development is served by necessary infrastructure) would require the location to be deleted on the basis that this cannot be achieved

It is hard to see what 'connections to the wider strategic network' would mean without a new road to the south, at least to the A414 and probably the A12. These would face the same difficulties as a western relief road, particularly since the route south would be through Green Belt, so housing development adjacent to the route could not be used to facilitate land acquisition or funding. Yet without some kind of strategic connection to the south, there would be an unacceptable impact on the village of Writtle.

## Integration with Existing Communities

Due to the Green Belt surrounding Writtle village, the new settlement could not integrate spatially with Writtle. It is also difficult to see how it would integrate with the Chignal Road (Avon Road) Estate, which is a compact linear development of mid-20<sup>th</sup> century housing (originally council housing) with a clearly defined western edge. It is likely that the two developments/communities would remain very distinct and therefore would not be capable of achieving integration between communities.

## Impact on Landscape and the Environment

Location 2 appears to sit on two landscape character areas: the Can and Wid River Valley, which has a moderate to high sensitivity to change or new development (Chelmsford Landscape Character Assessment), and the Writtle Farmland Plateau. This is noted for a 'sense of tranquillity' away from major roads and its wide, open views. Significant development at Location 2 would therefore be highly visible across a wide area and the Assessment suggests Landscape Planning Guidance to 'conserve the mostly rural character of the area'. It also appears that the Special Landscape Character designation of a large part of this site has not been taken into account.

Finally, there are concerns about surface water run-off, because of the sloping gradient towards the Can and Writtle village. This part of Writtle (Lordship Lane) is already one of the first areas in Chelmsford to flood during prolonged periods of rain and the situation would clearly be exacerbated by development on this currently open agricultural land. There is no evidence available to demonstrate that this could be suitably mitigated.

## **Location 3 North Chelmsford/Broomfield**

### Infrastructure and Transport

Table 6 indicates that this development will need to be facilitated by 'Connections to the wider strategic network including potential new access to Broomfield Hospital/Potential Western relief road'. Planning on such a road has only just started and it has yet to be established whether a western relief road would be feasible or beneficial. Even if so, the next planning period would be taken up with strategic planning and attempting to secure funding. It is almost impossible for implementation to take place before 2036 (potentially much later, or never, depending on funding). Therefore, Spatial Principle 9 (To ensure new development is served by necessary infrastructure) would require the location to be deleted.

The Parish Council (along with Chignal and Little Waltham Parish Councils) has commissioned study of the role and effectiveness of a potential western relief road from Journey Transport Planning Ltd (January 2016). Full details are attached to our response to Question 24. The main conclusions include:

'6.17 The provision of a full western relief road alongside a North East Bypass will not provide any significant benefits in the context of either existing traffic patterns or the growth options being considered in the Issues and Options consultation report.'



'6.18 In consideration of the foregoing assessment, there is no evidence to support the provision of a Chelmsford western relief road as outlined in the Chelmsford Local Plan Issues and Options consultation report November 2014 and moreover the provision of such infrastructure would not provide sufficient benefit in terms of alleviating Chelmsford's existing or projected traffic congestion on strategic routes into the City Centre'

The Parish Council therefore does not believe that the provision of a western relief road would make any significant difference to the traffic impacts of Location 2, which would be primarily directed towards the City Centre. Please refer to the full Study for further details, which is submitted in support of our representations.

Further, the Parish Council is sceptical whether any significant benefit would be achieved by a link from a western road into Broomfield Hospital. This is because the Hospital primarily serves an area to the north, south and east, not the west or south-west. This should be thoroughly tested before any development is proposed on this basis.

The only benefit of such a link could be for traffic approaching from the north. After consultation with the Hospital, the Parish Council has prepared its own scheme to achieve a second access road to the Hospital. This would be as effective as a link to a western road, more achievable and less damaging to the landscape. Further details are attached to our response to Question 24.

Table 6 also indicates there would be 'Strategic pedestrian connectivity'. It is hard to understand what this would mean in practice and again, there is no detail of how this would and could be achieved to support the growth in this location. In terms of strategic connectivity to Chelmsford itself, this is unlikely as the distance would be around 3 miles – a fact which suggests the Document does not appreciate the remoteness of this Location.

#### Integration with Existing Communities

The Parish Council believes that development to the north and west of Broomfield would integrate poorly with the existing communities of Broomfield, Little Waltham and Chelmsford due to its remoteness. It should be remembered that Broomfield Hospital was built on the site of an isolation hospital, largely because the health authorities had available land there, so it is unsurprising that connections with other areas are problematic. Similar problems were experienced in recent years when new housing built for Hospital staff was hugely undersubscribed and the accommodation was used to house families from local authority waiting lists. Most journeys, particularly out of main bus operating hours, would need to be by car, even to community facilities in Broomfield or Little Waltham.

#### Impact on Landscape and the Environment

Development at Location 3 would necessarily be on the elevated land known as the Pleshey Farmland Plateau. The Chelmsford Landscape Character Assessment notes its 'strong sense of tranquillity'. This is especially noticeable in the area to the west and north of Broomfield, despite its

proximity to the village. The Assessment goes on to note the sensitivity of the quiet lanes and byways to increased traffic flow associated with new development. Guidelines in the Assessment suggest that in the event of any development:

'Ensure any new development is small-scale, responding to historic settlement pattern and landscape pattern..

Consider the visual impact of new residential development and farm building upon the surrounding farmland'.

This suggests that Location 3 is not suitable for the scale of development proposed in any of the 3 options.

By way of further explanation, we attach a letter from Gareth Gunning BA, FRGS, DipITP, FRTPI.

The potential impact of a western relief road on this sensitive environment is considered further in our response to Question 24.

#### Community views on Land Use and Landscape Character

As part of the extensive consultation for the Broomfield Parish Plan in 2004/5, residents were asked to prioritise landscape areas around Broomfield Parish, according to whether they were valuable and should be protected; or less valuable and could therefore be developed if the need arose. This was developed further through the consultation for the Broomfield Village Design Statement (2012) and the Community Landscape Character Assessment (2010). The consensus which emerged can be seen most clearly in the Landscape Character Statement, though also in the Parish Plan (p.20/21). Both are available at:

<http://www.broomfieldessex.org/bpc/parish-plan-vds.html>

In short, the area to the 'west and north of Broomfield' comprises character areas G and H, which were identified by residents as areas that should receive the most protection (1<sup>st</sup> and 3<sup>rd</sup> respectively, out of 9 areas). These correspond with Location 3, which the Parish Council therefore concludes is the most unacceptable of all potential development locations in Broomfield in terms of local community consensus.

#### Heritage Assets

It may be helpful to draw the City Council's attention to the presence of Iron Age and Roman archaeology in the area of search. This is not set out in the Issues and Options Plan in relation to this site, however these have been known about for some time (see for instance CBA Research Report 26, Excavations at Little Waltham 1970-71, PJ Drury, 1978) but recent fieldwalking, metal detecting and geophysical surveys by the Broomfield local history group indicate that the archaeology could be of particular interest and require excavation prior to any development, not just on the site itself, but also investigation of the wider landscape and field systems (see Drury, p.135) to determine the relationship of Roman and Iron Age settlement patterns.

Further details can be provided, though it would be inappropriate to do so in a public document in the interests of protecting the archaeology. The key relevance is that if Location 3 were to be taken forward, any development could be delayed or incur additional cost, which would impact the deliverability of this location.

#### Recognition of landscape value and infrastructure constraints in Broomfield

During the preparation of the North Chelmsford Area Action Plan (NCAAP), the Borough (now City) Council recognised that the western part of the parish around Broomfield village had limited capacity to absorb more development and reduced the housing allocation from the 1,000 dwellings envisaged in the Core Strategy to 800. NCAAP recognised that the 800 housing units proposed for west Broomfield is an upper limit. The Issues and Options Consultation Document (para 9.2), summarised this as follows:

'The Broomfield area could potentially accommodate up to 800 housing units and could link to the existing communities. It is however more suited to absorb a smaller scale of development because of:

- Its more sensitive landscape setting and the pattern of existing communities
- Its greater dependence on the existing road network and local community and social facilities; and
- Infrastructure capacity.'

The latter point includes:

Infrastructure: The existing road network is fully committed with existing traffic pressures; sewerage capacity is almost at capacity and even existing NCAAP development will require a pumping station to hold sewage until less busy times

Surface water drainage problems appeared with the construction of Site Allocation 3 (Essex Avenue). The problem seems to be that development located to the west of the village has a complex dispersal route through a number of drainage channels until it reaches the Chelmer. These are in private ownership, so enforcement is difficult.

The Statement of Common Ground between the City Council and Broomfield, Great Waltham and Little Waltham Parish Council at the NCAAP Examination in Public in January [YEAR] is attached, outlining those councils' opposition to the development which is now being proposed at Location 2. Since then, nothing in terms of landscape, infrastructure or other constraints has changed.

#### **Locations 13, 14 and 15 (Ford End, Great Waltham and Little Waltham)**

The Parish Council is also opposed to these developments. As with Location 3, they would put further stress on road infrastructure that is already highly congested. In addition, the impact on smaller settlements (especially Ford End) could be disproportionate.

**In conclusion**, the Parish Council urges the City Council to delete Locations 2, 3, 13, 14 and 15 from further stages of the Local Plan process.

### **Question 23**

**Are there any alternative or additional locations for new development growth that should be considered in the new Local Plan? Where possible, please support your answer with reference to any evidence. If you are a landowner or promoting a site for development please follow the instructions at [www.chelmsford.gov.uk/shlaa](http://www.chelmsford.gov.uk/shlaa)**

#### **Locations along the A12/A130 corridor**

To support the alternative option proposed in our response to Question 21, we attach a list of sites along the A12/A130 corridor which we believe would represent appropriate locations for growth in this Plan.

The purpose of this list is to demonstrate that there are a considerable number of sites that appear to be achievable, suitable and deliverable along this corridor. It is not meant to indicate that the Parish Council believes they should all be selected – that would be more appropriate for a later stage of the Local Plan process and would require more local knowledge.

The Boreham Airfield site has not been included, due to concerns about gravel extraction (and noting that some of it is included in Location 4 as deliverable within this Plan period). The capacity of the site at Hammonds Farm has been capped at 3,000 in this list, to reflect that only 3,000 dwellings would be achievable in the next Plan period 2021/36.

#### **Alternative locations/sites in or adjacent to Broomfield**

As indicated in our response to Question 22, the area of search for Location 3 is based on two of the landscape areas that local residents are most keen to protect. The Parish Council has therefore explored the extent to which sites in areas which are less valued by local residents could be used for smaller scale development, which might in total meet an identified need.

Such sites would reflect a dispersed approach to growth of the type favoured by the Parish Council and the City Council in the current NCAAP. It would avoid a large greenfield development such as Location 3. Due to the concern of the Parish Council and local residents, the traffic impact of each site would need to be carefully modelled; and community benefits would need to be identified.

Critical infrastructure would also include primary school places. There is likely to be some flexibility here, as the new Primary School has yet to be built. We understand that in any event, it is planned to build the new school with the ability accommodate up to three forms of entry.

Based on current work, the following sites appear capable of offering some additional dwellings (over and above NCAAP dwellings where relevant):

- Development around a new second access to Broomfield Hospital (as outlined in our response to Question 24). Benefit to the village: reduction in traffic on Hospital Approach and at the junction of Hospital Approach and Blasford Hill; consequent reduction in northbound queuing at this junction and use of Court Road as a cut through to Hospital Approach.
- Days Garage (brownfield site) and surrounds, including replacement of ramshackle farm buildings at Roselawn Farm. Benefit to the village: access to an area of open space in the river valley (of heritage significance) currently with no public access; achievement of 'missing link' in cycle route to Valley Bridge; replacement of old unsightly buildings at Days Garage and Roselawn Farm with better designed housing.
- Additional dwellings on allocated NCAAP site behind Broomfield Place and current Primary School site, with redesigned access. Benefit to the village: better access roads through the site than currently planned, to ease pressure on School Lane.

Work to date suggests a maximum limit of 750 dwellings could potentially be achieved through such sites, which would match the limit imposed by one additional primary school form of entry. The Parish Council will continue to explore these options as soon as possible and will keep the City Council informed.

## **Question 24**

**Do you have any comments on the following potential road and transportation improvements as shown on the Spatial Options plans? Potential Western Relief Road Potential improvements to the A132**

### **Potential Western Relief Road**

The Parish Council is strongly opposed to the potential western relief road for the following reasons:

#### **1. Potential Dilution of Focus on Achieving the North-East Bypass**

The North-East Bypass was an essential item of infrastructure for the current plan 2001/21 to enable development in north Chelmsford (which is taking place anyway) and to provide a strategic link to the A130/A12/A131 corridor. In our view, the Local Plan 2021/36 must provide a relentless focus on achieving it by 2036, in order to relieve the significant peak-time congestion in Broomfield, Little Waltham and Springfield.

Development adjacent to the route which might assist in facilitating it through developer contributions (e.g. Park Farm/Boreham Airfield) should be seriously considered as part of this Plan and the overall strategy for growth. However, this on its own is unlikely to meet the shortfall of £250 – 300M, and significant government funding will also be needed. The Parish Council is deeply concerned that pursuing a north-west relief road at the same time will dilute the focus, energy and funding needed to secure the North-East bypass.

#### **2. Lack of Evidence of the role of and need for a western relief road.**

The Parish Council understands that planning for a western relief road has only begun since the City Council shared its preference for large scale development west and north/west of Chelmsford with the County Council. We are however concerned that:

- a) The proposal is something of a knee-jerk reaction, linked to a common assumption that large cities often have ring roads, but without any evidence that it would help in this case
- b) By linking it with the 'Indicative Infrastructure Requirements, for Locations 2 and 3, the Document gives the impression that the relief road would specifically mitigate the impact of those developments and that, if development is accepted, the road might be brought forward in order to provide such mitigation. The idea of the road should not have been introduced into the Consultation Document in this way until the evidential case could be presented.

In the absence of any significant studies, Broomfield, Chignal and Little Waltham Parish Councils have commissioned their own study by Journey

Transport Planning Ltd. The full report is attached to this response. The key findings relevant to this response are:

- The importance of achieving the North-East Bypass

Para 5.24 of the study shows that the provision of a North-East Bypass 'would be likely to reduce peak hour flows on the Broomfield and Essex Regiment Way corridors by around 25% on current levels' without significant new development.

- The lack of benefit in adding a North-West Relief Road

Whilst there would be benefits to Writtle of having a relief road south of the A1060 (effectively a Writtle by-pass), there would be no benefit in a full western relief road. Para. 6.17, fourth bullet point states:

'The provision of a full western relief road alongside a North East Bypass will not provide any significant benefits in the context of either existing traffic patterns or the growth options being considered in the Issues and Options consultation report.'

- The further danger of infilling to the line of a western relief road

Whilst this is not proposed in the current Document, it would be normal practice to allow infilling development which would be linked to the funding of the road (assuming there is no Green Belt designation or equivalent) – without it the road would be unlikely to achieve sufficient funding. The report draws attention to the wider problems to the west of Chelmsford that would follow such infilling, particularly to the Chelmsford western approaches (A1060) – see para 6.15.

The clear conclusion is that the provision of a North-East Bypass should proceed as quickly as possible to facilitate the delivery of development in this area, but that there is no significant benefit to providing a north-western by-pass as well.

### **3. Timescale for Delivery**

Unlike the North-East Bypass which is in the advanced stages of planning and already has an agreed route, a western relief road is at very early stages of planning, so the feasibility of any particular route is unclear. Land in the likely corridor is in multiple ownership and compulsory purchase could well be necessary. Further, south of the A1060, the route would pass through Green Belt, so again, there would be challenges in achieving its delivery in this context.

It is almost certain therefore that a western relief road could not be constructed in the next Plan period 2021/36. If linked to development at Locations 2 and 3 as necessary infrastructure, it is therefore likely that the Spatial Principles would be breached by retaining these Locations for growth in the Plan: either the development would go ahead without the infrastructure or the development would be constrained by infrastructure and unachievable in the Plan period.

### **4. Environmental Impact**

Whatever the precise route eventually selected, a western bypass would inevitably cut across the Writtle Farmland Plateau, the Can and Wid River Valley; and the Pleshey Farmland Plateau. The Special Landscape Character north of Writtle would also be likely to be affected depending on the exact route.

The Writtle Farmland Plateau is noted for a 'sense of tranquillity' away from major roads and its wide, open views. A new relief road would therefore be highly visible across a wide area, contrary to the Assessment which suggests Landscape Planning Guidance to 'conserve the mostly rural character of the area'. Regarding the Pleshey Farmland Plateau, the Chelmsford Landscape Character Assessment notes its 'strong sense of tranquillity'. This is especially noticeable in the area to the west and north of Broomfield, despite its proximity to the village.

Further details are included in our response to Question 22 in relation to development in general. However the critical point for a road corridor is that the Pleshey Farmland Plateau has an elevated position above the village of Broomfield and the Chelmer river valley. Noise pollution in particular would therefore spread over a wide area. The Plateau is also visible from a wide area so light pollution would also have a significant impact (as the Broomfield Hospital buildings illustrate now, even though they are lower down the valley slope).

The Landscape Character Statement also notes the huge impact of the A12 corridor on the Boreham Farmland Plateau. It notes for instance that:

'The A12 forms a key landmark in the area as it is raised above the surrounding landscape and is visible over a long distance' and 'The road is a very dominant feature as the traffic noise carries across large swathes of the area reducing the sense of tranquillity'.

Apart from this dominant feature, the two Farmland Plateaus share many common characteristics in terms of landscape and relief. Construction of a relief road or bypass on the elevated land to the west of Broomfield can be expected therefore to have a similar effect on the environment as the A12 does in relation to Boreham, which would be unacceptable in the context of the landscape character of the area. This proposal cannot therefore be promoted in the absence of evidence demonstrating how this might acceptably be achieved in this context, which is not demonstrated in the evidence base to this Issues and Options document.

## **5. Community Consultation on Relief Road Routes**

Our response to Question 22 explains that development to the north and west of Broomfield would affect the area that local residents most wish to protect, according to the consultation for the Broomfield Parish Plan, Village Design Statement and Landscape Character Statement (between 2004 and 2012).

The Parish Plan also asked residents to show support or opposition to 4 potential routes for a relief road towards Broomfield Hospital. Full details are contained on pages 17-19 of the Parish Plan which can be accessed at:



<http://www.broomfieldessex.org/bpc/parish-plan-vds.html>

In summary, there was strong support for a road to link Broomfield Hospital to the A130 Essex Regiment Way and overall support for a road from the B1008 at Ash Tree Corner (between Little and Great Waltham) to the Hospital. However there was more opposition than support for possible routes from the south (one direct from Writtle and one which hugs the settlement boundary more closely).

It is important to stress however that there was little support for any relief road funded on the back of housing development; the consultation showed a strong view that any relief road should be funded by local or central government.

Therefore it is surprising that the particular route now being suggested by the Document is one that attracted more opposition than support, when other routes were popular or very popular (albeit without housing attached). The Parish Council understands that the Highways Authority is still keen to pursue the possibility of a road from Essex Regiment Way to Broomfield Hospital and that a certain amount of planning and consultation work was completed alongside planning for the North-East Bypass. It is extraordinary therefore that this potential route is not even mentioned in the Document. If a relief road had to be taken as a given, a route from the A130 Essex Regiment Way would clearly be much more preferable to Broomfield residents in general than any other, including the one now proposed.

## **6. Potential Second Access to Broomfield Hospital**

Table 6 indicates that a potential western relief road could offer a potential second access to Broomfield Hospital site. Judging by developer plans submitted to the North Chelmsford Area Action Plan (NCAAP) Examination in Public, this would be from the west.

This long-running suggestion is also surprising, since the Hospital provides general treatment to an area stretching from the north (Braintree), far to the east (e.g. Maldon and Burham) and the south-east (Chelmsford itself). To the west, apart from the relatively small settlements near Writtle and Roxwell, secondary healthcare tends to be delivered at Princess Alexandra Hospital in Harlow. The Parish Council finds it hard to understand how a relief road from the west would make much impact on Hospital related traffic, which would still continue to use the B1008 Main Road and Hospital Approach, as would staff (assuming reasonably even distribution of staff across the same areas). Only staff or patients arriving from the north might be expected to use a western access in preference to the current eastern access (although it would be somewhat circuitous even for them).

The Parish Council has discussed the issue of a second access with senior staff at Broomfield Hospital. It understands that the Mid-Essex Hospitals Trust board is open to exploring opportunities for a second access.

Accordingly, we have produced an initial plan (attached) to indicate how a second access could be provided to link the B1008 at Blasford Hill to the

Hospital internal ring road near the West Car Park via a new access point on the northern edge of the Hospital site (attached).

The area adjacent to the road could provide some development around the brownfield site of Montpellier Yard, subject to the overall traffic impact being neutral (e.g. by the negative traffic impact of the development being balanced by the positive impact of removing traffic from Blasford Hill, Hospital Approach and the Hospital Approach/B1008 junction).

The new access road and any associated development would nestle on the same ridge as Broomfield village does itself and would not encroach on to the higher land of the Pleshey Farmland Plateau. The access road would meet the Hospital's aspiration for a second access without the need for a western relief road.

In conclusion, for the reasons set out above, the Parish Council strongly urges the City Council to remove the 'potential western relief road' from forthcoming stages of the Local Plan, either entirely or at least from the A1060 northwards.

### **Potential improvements to the A132**

The Parish Council has no objections and would support improvements to support growth/regeneration in this area. The prime focus for attracting government funding should however continue to be the Chelmsford North-East Bypass.

### **Question 25**

#### **Do you have any comments on the approach of discounting development growth in the Green Belt in the new Local Plan?**

Para 6.33 sets out the importance the Government places on the Green Belt. However, this section of the Document fails to distinguish between the importance of the Green Belt and the possibility (even necessity) of reviewing the function and purpose of Green Belt land through the Local Plan process. The NPPF makes provision for the review of Green Belt boundaries through the Local Plan process and, although this is not a requirement, it is a key opportunity, which if not taken, will potentially be many years before it is again an opportunity (the duration of this Plan period). Not doing it at this stage it therefore a significant missed opportunity, which, even if the outcome is that there is no need for or case for review of the boundaries, should be taken at this time, particularly in an area which is considerably constrained by a significant extent of Green Belt.

It is difficult to see how the City Council can comply with the requirements of the NPPF section 9, especially in terms of understanding and securing the purpose of the Green Belt within its boundaries and the extent to which this is being achieved, without conducting a review. Whatever the outcome of such a review, the Parish Council believes the City Council should conduct one. It is unsatisfactory not to conduct a review but still conclude that the aims, purpose and success of Green Belt land is exactly the same as during the previous planning period.

The Document argues that Green Belt boundaries were reviewed in 2012 as part of the current 2001/21 planning period so don't need to be reviewed again. However, that is a different planning period during which the City area faces different challenges and opportunities. The fact that the review was carried out so late during that planning period is not relevant; it will be nearly a decade out of date by the start of the new Local Plan period and the agenda will have changed.

In the current planning period 2001/2021, it was possible to locate significant development on brownfield sites and limit the majority of greenfield development to two new neighbourhoods to the north of Chelmsford (mainly one new neighbourhood in North-East Springfield). Due to those brownfield sites being used up, the new Local Plan will be much more reliant on Green Belt sites and therefore have a far greater impact on greenfield land. The number of new greenfield locations being proposed in the Document compared to the previous LDF is an illustration of this new reality after 2021.

The basic similarity of all 3 spatial options in the document suggests that the City Council does not feel it has much flexibility in meeting the scale of development being tested from non-Green Belt locations that are achievable, suitable and deliverable. Otherwise, it would have offered a wider range of options for consideration. Further, the landscape impact of these options on the rural area west of Chelmsford (the Pleshey and Writtle Farmland Plateaus) is very severe in all 3 options. Presumably the City Council felt that the landscape impact was even greater at other locations not included in the options, or it would have included them to widen the alternative scenarios of offer.

This indicates that claim in para 6.35 that: 'even if a further uplift to housing numbers was ever required (*i.e. beyond the higher figure of 930 dpa*), it is still the case that areas outside the Green Belt could accommodate significant areas of development growth beyond that proposed in this document' is false. If it were true, why are these 'significant areas' not being put forward as potential development locations now in order to differentiate the options more clearly?

It is clear therefore that there is a case for examining the current Green Belt boundaries in order to establish whether there are potential locations within it that would provide more 'sustainable patterns of development' than alternative options outside, as suggested in para. 83 of the NPPF, which also states that the preparation of a new Local Plan is an opportunity to do so. A review would also help to ensure the permanence of the remaining essential areas of Green Belt, as required by para. 79 of the NPPF.

It is contradictory that the Document states in para 6.34 that: 'The Council need to establish whether a case can be made for any release of land within the approved Green Belt' and then in para. 6.36 that '..currently there are no exceptional circumstances that means that an option for development growth within the Green Belt is neither necessary, justified or reasonable at this time.' This conclusion can only be reached by conducting a review at this stage.

A review should also be carried out to assess whether any extensions to the Special Policy Areas within the Green Belt could be justified. Taken together, para. 6.37 and Question 28 imply that Special Policy Area boundaries could be changed even in the Green Belt in order to support the important functions of those facilities.

The scope of a review could include whether there is an exceptional case for establishing any new areas of Green Belt. The proposals in all 3 options include significant development north of Great Leighs on the outskirts of Braintree, which carries the risk of coalescence between Great Leighs and Braintree. As indicated in para 80 of the NPPF, this is a key purpose of Green Belt. The possibility of coalescence there is arguably as great as in any area of the current Green Belt, so there would appear to be a *prima facie* case for establishing (in conjunction with Braintree District Council) a new green belt in that location.

Finally a review is needed to provide robust evidence about the potential use of Green Belt land to ensure it is being used to maximum effect for the

purposes set out in para. 81 of the NPPF (e.g. to provide opportunities for outdoor sport and recreation).

In conclusion, the Parish Council urges the City Council to re-consider its decision to discount any development in the Green Belt without conducting a review. Indeed, if the City Council's confidence in the existing Green Belt boundaries is correct, there is nothing to fear from such a review and the preparation of a new local plan (as indicated in para. 83 of the NPPF) is the ideal time to do it.

### **Question 26**

**Do you have any comments on the approach of discounting a large new settlement in the new Local Plan?**

#### General points

1. The document proposes a number of large development locations, some immediately adjacent to the urban boundary (e.g. locations 2 and 6), others slightly separated from it (e.g. location 4). Both types include a development of 3,000 dwellings – location 2 on the urban edge and location 4 slightly separated.
2. These large sites include the risks that the Document associates with large new settlements including:
  - the delivery of new infrastructure
  - speed of building out (i.e. deliverability)
  - overdependence on one site
  - integration with existing urban areas
  - environmental impacts of a large development in one place.

Proximity to the urban boundary does not necessarily mean that these problems will be resolved. For instance location 2 includes in the indicative infrastructure requirement: 'Connections to the strategic highway network - Potential Western Relief Road.' It is accepted that it is almost impossible for this road to be constructed within the Plan period, yet Location 2 has nonetheless been included in the spatial options.

3. Therefore the distinction between large urban extensions/ new sustainable neighbourhoods on the one hand and 'large new settlements' on the other is at the best somewhat arcane and at worst contradictory. The purpose of the Issues and Options stage is to set out a range of options, albeit that some may in due course prove to have significant flaws and ultimately be rejected. The Issues and Options stage is part of the process to determine whether this is the case or not. Therefore despite the City Council's misgivings, these 'large new settlement' locations should have been included as options in this consultation document.
4. Further, it is difficult to see how any large site might develop into a 'large new settlement'. If around 3,000 dwellings represents the upper limit for any new settlement in one Plan period, it is hard to see how

any 'large new settlement' can ever be achieved. It will always require a longer term vision over two or more planning periods.

There is always a risk that a large new settlement conceived in one Plan period may not be continued into the following period due to a change of circumstances. However, we consider that both Hammonds Farm and the relevant sections Park Farm/Boreham Airfield could be justified as urban extensions in the 2021/36 Plan period, even if they were not expanded further after 2036. The comparison with South Woodham Ferrers (as a large new settlement that never became large enough to maintain a sufficient range of services) is unhelpful, as it is significantly removed from any other large urban focus, so is very different.

#### Specific Comments – Park Farm/Boreham Airfield (para. 6.42)

5. This is a huge location, which could ultimately accommodate more than 7,000 dwellings. However, it does not need to stand or fall as one site. Indeed, the Document itself recognises in Option One the potential for Park Farm to be developed as a large urban extension. It is therefore rather confusing to classify Park Farm/Borham Airfield/Bulls Lodge Quarry as one 'large new settlement', when in fact it has the capacity to include one or more large extensions, of the type promoted in the Document.

The Parish Council accepts that mineral extraction is a critical constraint to the delivery of sites. However, this location also has huge potential due to its proximity to the route of the North-East Bypass and the possibility (reasonable at the Issues and Options Stage at least) that development adjacent to the route might facilitate developer funding, and in turn matched government funding. So it is essential that the City Council works as hard as possible with the Minerals Authority, the landowners and the gravel extractors to bring forward as much as possible of Park Farm/Boreham Airfield for development in 2021/36 – at least to the 3,000 dwellings envisaged in Option One and preferably more.

#### Specific Comments – Hammonds Farm (para 6.43)

6. The Plan discounts Hammonds Farm, however, we consider that there are merits in this location, which could also be a suitable location for a significant urban extension (similar to Location 2) between 2021/36. Noting that there may be a requirement for a new junction off the A12 to facilitate its full development, the Document doesn't suggest that the A12 should be an absolute limit to the expansion of the Chelmsford urban area, so its location on the eastern side of the A12 is not an automatic obstacle. Whether the development achieves sufficient degree of integration with the Chelmsford urban area will depend on relevant measures put forward by the promoters – it should not be assumed that it cannot be achieved. Features such as major roads can help to give settlements a distinct identity (see for instance Boreham village), provided that infrastructure can be achieved to make secure connections where necessary (e.g. for access to services that

cannot be provided in the new settlement itself).

The Parish Council cannot see an objection in principle to Hammonds Farm at this stage. It is well-located in relation to Chelmsford to provide a satellite settlement similar in size and position to Writtle and Broomfield, able to support a reasonable range of services and a distinct identity, yet close enough to the City centre to benefit from the higher-order facilities on offer there.

The huge attraction of Hammonds Farm is its potential to support a strategy of diverting commuter traffic away from the City Centre by offering easier access to the A12 and (particularly at the northern end) for sustainable travel to the new railway station at the Boreham Interchange. The Parish Council accepts that Highways England will have concerns about the pressure of additional traffic at the A12/A414 junction and on the A12 in general. However, this is not a sufficient objection to exclude it from consultation and the opportunity for the promoters to demonstrate a satisfactory degree of mitigation. Indeed, all the development proposed in the Document will have an impact on the A12 at some point.

The other objections referred to in paragraph 6.42 appear to be less significant. In terms of flood risk, the promoters appear to have planned development to avoid affected areas. Sensitive landscape character is not an obstacle for inclusion at Issues and Options stage elsewhere in the document, for instance at Locations 2 and 3, so it seems inconsistent to apply this consideration solely at Hammonds Farm, especially since the existing landscape character is already so adversely affected by the A12.

7. In conclusion, whilst overriding objections might (as with any location) develop at a later stage, the Parish Council believes both the methodology and site specific considerations for excluding these potential locations at Issues and Options are mistaken. It strongly urges the City Council to include these sites and the potential for a new settlement within its options going forward.

