



BROOMFIELD PARISH COUNCIL – RESPONSE TO CHELMSFORD LOCAL PLAN PRE-SUBMISSION CONSULTATION MARCH 2018

This is Broomfield Parish Council's Response.

In order to facilitate the process for the City Council and for the Inspector by highlighting areas of common ground between adjoining Parishes, the Parish Council has prepared a response jointly with other members of the North and West Chelmsford Parishes Group. The parish councils concerned are: Broomfield, Chignal, Little Waltham and Writtle. Please be aware that those councils will also submit this document as their response, though they may also add extra material relating to their own parishes.

This Response should be read in conjunction with the attached Transport Report by TTHC Ltd.

Consultation Response on behalf of the North and West Parishes Group

March 2018

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Chelmsford City Local Plan; Submission Draft

March 2018

1. Executive Summary

These representations are prepared on behalf of the North and West Parishes Group ("The Parishes Group") and set out their mutual response in relation to the Pre-Submission Chelmsford City Local Plan.

It is the case of The Parishes Group that:

1. The Plan places significant pressure on the delivery of growth at North East Chelmsford (SGS4). The delivery and success of this area is dependent on significant infrastructure in the form of the Chelmsford North East Bypass, the timing and delivery of which is uncertain, therefore the reliance on this area is unsound.
2. There are also risks in terms of the timing of delivery of the extent of development at North East Chelmsford and the multiple ownerships of this area required to coordinate this.
3. The development of the North East Chelmsford Growth Area would have an unacceptable impact on the villages to the north of Chelmsford and would have limited relationship with them.
4. There are other locations which could more suitably accommodate growth than that focused at North East Chelmsford, for example around existing infrastructure and infrastructure hubs, such as around the A12 corridor (and specifically Hammonds Farm, Boreham, Howe Green and Rettendon).
5. The growth to the North of Broomfield (SGS6) is a concern and must be mitigated to the extent possible through infrastructure improvements (including the new Hospital Access Road) and identification of landscape and woodland improvement areas within the identified development area.
6. The growth in West Chelmsford (SGS2) raises concerns in terms of the extent and impact of the increased level of traffic generation and the lack of mitigation proposed to address this. This area also requires the development of sensitive landscapes and does not represent a sustainable growth of the rural area in which it is situated. There are also issues in terms of the extent of social infrastructure provision and impact on the existing local communities.
7. Fundamentally it is considered that the Plan is not justified in not having undertaken a Green Belt review. The extent of development to the north of Chelmsford comes as a result of limiting the development to the south of Chelmsford, which lies partially within the Green Belt. These areas are located such that they face demand for housing to accommodate commuter growth and they are sustainably located to facilitate this. This approach also relies upon the development of higher grade agricultural land to the north of Chelmsford, which has not been adequately balanced against the loss of Green Belt.
8. There is also concern in relation to the housing figures assumed in the Plan and as to whether the growth strategy can suitably accommodate higher numbers which would be required through a standardised housing calculation approach, which may be required in the Plan period.

The representations made by the North and West Parishes Group expand upon the details of these matters and are supported by detailed highways evidence prepared by TTHC, which forms part of this submission.

2. Context

The North and West Parishes Group (“The Parishes Group”) comprises Broomfield Parish Council, Chignal Parish Council, Little Waltham Parish Council and Writtle Parish Council. These parishes have shared views on the Chelmsford City Local Plan and therefore have prepared this combined response to the current consultation. Their comments were provided in this same group format in relation to the earlier stage of Preferred Options Consultation. The North and West Parishes Group welcomes the opportunity to comment further on this stage of the Plan preparation and the comments hereby made reflect their joint views on the Pre-Submission Draft of the Chelmsford City Local Plan.

The main areas of comment by The Parishes Group relate in part to the overall housing numbers, but most specifically in relation to the strategy chosen and the locations for growth in this context.

Specifically, there are concerns over the risks related to the extent of development proposed at North East Chelmsford. There is a very high reliance placed on this one area to deliver housing growth and considerable infrastructure needed to realise it, the timing and delivery of which is uncertain, and which could considerably compromise this growth strategy, resulting in significant impacts on the villages to the north and west of Chelmsford. The North and West Parishes Group believes that there are alternative growth approaches which could relieve this pressure on North East Chelmsford, including the consideration of development at Hammonds Farm (which has not been taken forward for consideration in this version of the Plan) and the potential for the review of Green Belt land, which would release some areas for growth to the south of the City area. These alternative approaches have not been given adequate consideration and would provide sustainable alternative growth options to achieve the future needs of the Plan area.

Alternative sites, such as Hammonds Farm, Boreham, Howe Green and Rettendon would provide additional locations for growth in the event that North East Chelmsford does not come forward to the extent or at the rate anticipated. By identifying additional sustainable growth locations, it would widen the market area for development, making for a more economically sustainable pattern of growth. Hammonds Farm in particular, can deliver a significant number of homes off the existing infrastructure and with limited additional improvements to this to secure its long-term future. As such, this site should be recognised as a future growth area, to support the growth to the North East of Chelmsford and make for a more sustainable and robust growth strategy.

These strategic views are supported by other considerations, relating to the release of higher grade agricultural land, which is generally located to the north and west of the area; it is considered that this has not been given adequate weight in the assessment of relative impacts of the development options.

The Plan should also reference and reflect the demand which will result from the location of Crossrail and the potential for this to be supported by further development to the south of the City area, which would respond to this and the ongoing pressure of commuting patterns from London. This would further justify the consideration of additional growth to the south of the City area, again releasing pressure on the North East of Chelmsford, in a sustainable manner and location.

3. Representations to Draft Local Plan

Paragraph 1.18

The Plan refers at page 10 to the requirement to be in accordance with the National Planning Policy Framework (“NPPF”) and the Housing White Paper consultation on “Planning for the right Homes in the Right Places”. There is a challenge currently for Local Authorities in preparing their Plans in a changing national planning context. The Government has just launched consultation into a package of revised national level guidance, including a new NPPF, which will shape the future of Plan making. It is a weakness in the preparation of Local Plans that they cannot be certain as to the future expectations in terms of housing growth calculations. It is a circumstance which may be resolved in the coming months and, although there is transitional guidance in place, this circumstance and the Plan having not planned for the higher housing growth figures which may come out of this, is a weakness in the soundness of this Plan.

It is noted that the Plan states it is sufficiently flexible to respond to this changing circumstance, however there is no further detail as to how this will be accommodated in due course. It is vital that the Plan includes clarity in this regard, given that there is likely to be a change to the position in terms of the calculation of housing figures, either during the following stages of Plan preparation or shortly after its adoption.

Paragraph 1.18 also states that the Plan can accommodate the new housing number which would come from the standardised approach. It is noted that the Plan includes an extent of flexibility in terms of the delivery of housing numbers, however considerable work has been undertaken in suitably adjusting the extent and location of housing growth in the Plan area, during the process of preparation of this document to date. Even in this context, there are reservations as to the extent and location of growth set out in this draft of the Plan and whether there is the scope to meet a potentially higher housing growth figure within the growth strategy proposed by this Plan.

The Plan seeks to deliver a significant weight of the housing growth to the north east of Chelmsford. This approach places considerable pressure in this one area. It relies upon its delivery to the extent and at the rate set out in the Plan, to meet housing need, but it is considerably reliant on the delivery of significant infrastructure to achieve this. There is uncertainty as to the delivery of this infrastructure, therefore it is considered that the Plan should look again to ensure that the alternative sites have been suitably considered, particularly where they can deliver development within the Plan period and without considerable additional infrastructure, for example at Hammonds Farm.

The identification of specific sites which may accommodate growth should it be required, would make the Plan sound and justified, in ensuring that it can respond to changing circumstances within the Plan period. It would also ensure that in the event development was not achieved as anticipated at north east Chelmsford, that any shortfall would not need to be met through an increase in numbers at other identified growth locations, resulting in an inappropriate and unplanned for infrastructure burden on them.

Neighbourhood Plans

Paragraph 1.38 sets out the Council’s stance in relation to Neighbourhood Plans and the inclusion of this reference and the provision for neighbourhood planning is welcomed.

To be effective, the policy should specify that housing numbers for Local Plans would be identified by the Local Planning Authority and provided to the Parish Council or Neighbourhood Group, for their inclusion in the Neighbourhood Plan. This would improve certainty for these Groups as to the starting

point for their Neighbourhood Plan and the level of growth which would be in accordance with the Local Plan.

Furthermore, the provision should be made for Parishes or Neighbourhood Groups to consider the detail of boundaries of the Green Wedges and Green Corridors and their use in this Neighbourhood Plan making process and for these to be suitably adjusted and the nature of use refined through this process, subject to provision of an adequate evidence base to support any such change.

Q1: Do you Consider the Plan Legally Compliant?

It is considered that the Plan is legally compliant in the current context, however there is a challenge in terms of the emerging national position in relation to the calculation of housing numbers. The Government have consulted upon a standardised approach to the calculation of housing needs, which, if adopted, would change the way in which housing numbers are calculated and therefore the housing number which needs to be delivered by this Plan. The recent publication of a draft new NPPF and associated documentation suggests that this standardised approach will form part of a future planning approach.

It is likely that there will be further clarification on this emerging approach at a national level before the Examination into this Plan later in 2018. Therefore, although the Plan references at paragraph 1.18 that it can accommodate the new housing number which was set out in the draft consultation document and although there are transitional arrangements proposed, the Plan should make clear provision for accommodating this revised level of housing growth to avoid requiring an early review of the Plan to accommodate this in due course. Any such mechanism should allow for sufficient flexibility so that the Plan can respond to an alternative number, in the event that the number varies from that previously consulted upon, and/or a suitable transitional arrangement for moving to comply with any such emerging requirement. This should include the identification of additional, suitable sites to accommodate this increased level of growth in the most sustainable manner to avoid the need to increase housing numbers in other allocated sites where the scale of growth has already been extensively consulted upon and tested to reach the most suitable and sustainable level of growth, supported by infrastructure.

Q2 Does the Plan comply with the Duty to Cooperate

There is no reason to believe that this Plan is not compliant in this regard.

Q3 Do you consider the Local Plan is Sound?

No.

The Local Plan should meet objectively assessed housing need and infrastructure requirements. It has already been set out, in relation to legal compliance, that there is a weakness in the Plan's ability to respond to forthcoming potential changes to the means of calculation of housing numbers.

In addition to this, the North and West Parishes Group has reservations as to whether the extent of infrastructure required to support the level and location of growth envisaged by this Plan can be achieved in the Plan period. The development to the North East of Chelmsford (SGS4), for example, is known to require significant road infrastructure improvements to facilitate its delivery, but there is no certainty in terms of the timing of its delivery. This is a fundamental weakness of this Plan.

The North and West Parishes Group also has concerns about the location and extent of the growth to the North East of Chelmsford, in terms of its isolated location which means it will not be readily linked

to the centre of Chelmsford and existing surrounding communities. This same concern applies to the growth areas at West Chelmsford and North of Broomfield

The Plan is not therefore considered to be justified, in that it has not given full consideration to alternatives. The preferred strategy is also very heavily reliant on the delivery of infrastructure for which there is no certainty in terms of timing.

There are other options in terms of growth areas which could be delivered alongside the necessary infrastructure to facilitate their success, but which have been discounted in this version of the Plan, including growth at Hammonds Farm. There are other sites which were put forward in earlier drafts of the Plan such as those at Rettendon, Howe Green (J130/A12) and Boreham. These sites had considerable public support but have been discounted on the basis of evidence which shows they are less sustainable or deliverable than alternative sites which have been included in the Plan. It is considered that these do represent an equally, if not more, sustainable solution and which has not been justifiably rejected.

Furthermore, in the event that development is not achieved to the extent anticipated at North East Chelmsford, these sites represent reasonable alternatives for the delivery of growth, either in the event that growth numbers are not met elsewhere or indeed, in the event higher growth numbers are required as a result of a nationally adopted standard methodology for calculation of housing need.

The Plan therefore has weaknesses in terms of the extent and choice of sites identified. The Plan is consistent with current National Policy, but the Plan should be able to adapt to policy which may come into place either prior to the adoption of the Plan, or early in the Plan period, in order to avoid it becoming outdated very quickly. The identification of alternative growth sites, which would absorb increased growth figures in a sustainable manner, such as at Hammonds Farm, Rettendon, Howe Green and Boreham would achieve this and should be reflected to ensure that the Plan meets the tests of soundness.

Objectively Assessed Housing figures

The Plan identifies the joint housing market area and the way in which the other authorities in this area have already moved forward in their Plan preparation, with Chelmsford having been left behind the neighbouring authorities. It notes the need for these authorities to work together in terms of delivery of key infrastructure, homes and jobs. This will be progressed through the consideration of cross boundary matters and exploration of proposed garden communities across the area. The Plan is being pursued in the context of the known requirement for a review of the housing market area, which will need to be undertaken for it to be Positively Prepared.

In order to be flexible and effective, the Plan should identify further sites which may assist in meeting this revised target and should acknowledge the potential of other locations for growth, such as those put forward at earlier stages of the Plan, including Hammonds Farm, Rettendon, Howe Green and Boreham, where these can make a sustainable contribution to future growth, to ensure flexibility.

In terms of the figures themselves, it has been set out in relation to paragraph 1.18, that there is a risk in relation to the currently identified housing figure of 805 per annum (totalling 18,515). Although this is calculated on the basis of the objectively assessed housing needs (OAHN), which is the currently accepted practice for the calculation of housing targets, there is a proposed change to the national position in terms of the calculation of housing needs, which will affect this figure.

The North and West Parishes Group identified their concerns in relation to the higher housing growth figure of 930 per annum set out in the Preferred Options draft of the Plan. This was considered capable of significant impact in terms of landscape, infrastructure and the character of the area. Notwithstanding this, in the event that Council needs to achieve a higher number than the targeted 805, the Plan needs to identify sustainable means of achieving this, with minimal impact in terms of the primary areas of concern (infrastructure, landscape, character and heritage) in order to be Positively Prepared.

The North and West Parishes Group has ongoing concerns not only in relation to the target levels of growth set out in the Plan but also about the ability to achieve these, based on recent and ongoing housing delivery rates in the area. There will need to be a step change in housing delivery to achieve the Plan figures, which is likely to be largely reliant on the timely delivery of infrastructure. Without this, the delivery of growth will not come forward and create sustainable communities within the Plan period and therefore the Plan will not be effective.

This delivery would be assisted by spreading the market area across alternative growth locations, such as at Hammonds Farm, which would be able to bring forward homes in the Plan period, being less reliant on heavy investment in infrastructure early in the Plan period than other sites and providing additional choice in terms of the location of new homes.

This concern is compounded by the nature of growth in these growth areas. In North East Chelmsford for example, although the Parishes Group has no particular comments on the overall extent of employment growth, it is noted that there is a limited amount of employment proposed in this area. The residents of this area are therefore going to be required to travel for work, which will increase traffic movements across Chelmsford, adding to the infrastructure burden of this proposed development and again limiting its sustainability as a new settlement.

Paragraph 2.22 (page 22) shows the degree of commuting into and out of the City Area, which is particularly high into the north of the area from Braintree. Furthermore, it is identified that "The transport modelling evidence reveals that all of the principal roads and many local roads through Chelmsford are at, or near to, capacity during peak periods." The impact of increased traffic on local roads is of particular concern to the North West Parishes Group. As such, specific transport evidence has been prepared in this regard, on behalf of the Parishes Group, by TTHC, which forms part of these representations.

TTHC's Transport Report specifically considers the travel patterns within the City of Chelmsford and, at Section 4, sets out the assessment which has been undertaken of the Transport Assessment undertaken by Essex Highways, in relation to this Pre-Submission Draft Plan. TTHC has specifically investigated the assumptions in relation to areas Chelmsford 001 (Writtle and surrounds) and Chelmsford 011 (Broomfield and Great Leighs). The assessment concludes that the area is very highly dependent on car travel and that there will be worsening of traffic as a result of the proposed development (at West Chelmsford, Great Leighs, North of Broomfield and Little Waltham) and that there is evidence that the traffic impact as a result of the proposed development will be greater than calculated by Essex County Council's assumptions. There are therefore specific concerns that this Plan does not reflect the true impact of the proposed growth on highways infrastructure, nor give adequate weight to the potential impact of this on the success and quality of life of both the existing and new communities.

Paragraph 2.25 refers to Chelmsford's high-quality environment, which includes recreational space and parks, complemented by an extensive network of Green Wedges, Green Corridors, gardens and

nature reserves. It notes that the Green Wedges and Corridors make up 9% and 3% of the land in the Chelmsford Area respectively. The Green Belt covers 34% of the land in the south and west of Chelmsford.

The North and West Parishes Group has previously expressed concerns in relation to the Council's decision not to undertake a full review of the Green Belt review as part of this Plan process and it is still considered that there would have been a case for this and merit in doing so. Arguably this process is necessary to ensure that the proposals in the Plan are justified.

It is recognised that there would be impacts in terms of the release of Green Belt land or future development of the Green Belt, but this Plan results in impacts as a result of the development to the land to the north of Chelmsford. The area to the south which is partially in the Green Belt, is generally of a lower grade of agricultural land, whereas the land to the north, intended to be subject of development is generally of higher grade of agricultural land. This appears to have been given little weight in the decision as to where growth might most suitably be focussed and in the justification of the proposed development in this Plan.

Furthermore, the south of Chelmsford, which is generally where the Green Belt is located, is a more physically sustainable location for growth than the north. It is more accessible to the prime commuter areas and will only become more valuable and in demand on the opening of Crossrail to the south west and the new Chelmsford station to the east during this Plan period. These factors are considered to be exceptional circumstances which would and should have justified a Green Belt review to look at the scope for focussing further development in this area during the Plan period.

Policy has moved forward from earlier drafts of the Plan to provide greater clarity in relation to the policy on Green Corridors and Green Wedges. Fundamentally, it is deemed that the combination of the retention of the Green Belt and definition of considerable areas of Green Corridor and Green Wedge has significantly narrowed the areas which may be available for development, whilst not necessarily allowing for full consideration as to whether, on balance, these represent the most suitable and sustainable locations. The Plan may not therefore be justified on the basis of not having considered all reasonable alternatives in this context.

Paragraph 2.26 sets out the agricultural land classification, shown on Figure 6 (page 26). This shows the distribution of different classifications of land within the City Area and the extent of higher quality (mostly Grade 2) land in the northern area, where the greatest extent of development is proposed. As set out in relation to paragraph 2.25, it is of concern to the North and West Parishes Group that little weight appears to have been given to this in the identification of growth locations. Growth is very much focused on the northern areas, which are of the higher grade agricultural classification, away from the lower grade areas in the south. Although it is acknowledged that these areas are partially within the Green Belt, they could have been considered and, if, on balance, they were deemed a more sustainable location for growth, this could have justified a Green Belt review and more thorough consideration of the most appropriate locations for the focus of growth in this Plan.

3 Strategic Priorities

The Strategic Priorities are generally supported, however the North and West Parishes Group believe that these Strategic Priorities are not necessarily reflected in the Plan, as follows;

Strategic Priority 1 – Ensuring Sustainable Patterns of Development.

Sustainable development should balance improvements to economic, social and environmental matters. The representations to this Plan by the North and West Parishes Group have set out the risks

in this regard. By not undertaking a Green Belt review and allowing development on higher Grade agricultural land, by allocating Green Wedges and Green Corridors without adequate consideration to the extent of these and what happens between them, the environmental consequences of the Plan are compromised.

There are specific considerations in relation to the sustainability of the locations of growth and the transport infrastructure which will serve this. The Plan and supporting evidence demonstrates the high reliance on car usage and the existing train station and there is no significant change which would reduce this demand in the Plan. The Plan would be more sustainable by locating growth near to existing and known future transport interchanges, such as near the A12 corridor, the new rail station and the forthcoming Crossrail station, all of which would be more sustainable than the reliance on growth at north east Chelmsford which is heavily reliant on new infrastructure, in a less sustainable location, which will impact on surrounding existing local communities.

Strategic Priority 2 – Meeting the Need for New Homes

As a priority, this is supported, but there is weakness in the ability to achieve this through the proposed growth strategy, which places considerable emphasis on the delivery of development in one area at North East Chelmsford, which itself is dependent on the delivery of new infrastructure and which places a significant burden on the delivery of homes in one market area.

There is also the risk that the Plan will need to look again at the calculation of housing numbers in the context of emerging guidance at a national level. The Plan should therefore identify further sites for the delivery of housing numbers to meet local needs and fulfil this Strategic Priority so that development can be delivered in a sustainable, rather than ad hoc manner, which would have a greater impact on sustainable growth during the Plan period.

Strategic Priority 5 – Delivering new and Improved Strategic Infrastructure.

This is vital in ensuring the sustainable future of the Chelmsford City Area. Paragraph 3.14 acknowledges the challenge in terms of highways infrastructure and suggests that some change might be brought about through change in behaviour, however, the Plan needs to be realistic as to how likely this is and the extent of any such change and the impact of this.

The supporting evidence produced by TTHC on behalf of the North and West Parishes Group sets out the significant risks and pressures on infrastructure delivery in this Plan, including through the ongoing and increasing pressure on road infrastructure and should be read alongside these representations.

There is a significant need for the delivery of new transport infrastructure in a timely manner, but the level of certainty as to this and the unknown impact of its not being delivered is fundamental in understanding the soundness of this Plan. This circumstance is acknowledged by the supporting text and in Strategic Priority 5, however it remains a risk in this Plan and in the future success of the proposed growth.

Policy SP1

Policy SP1 sets out the requirement for the Plan to reflect the NPPF in terms of planning positively to meet Objectively Assessed Housing Need. It is suggested that this policy is amended to clearly identify the way in which this will be adapted in the event of the change in the means of calculating housing need, in light of the Government's recently launched consultation in this regard. It is likely that a changed approach will be forthcoming, if not in advance of the adoption of this Plan, certainly early in the Plan period. Therefore, this Plan should make provision for this, in order to avoid the need to

trigger an early review of the Plan, for the reasons set out in relation to the Objectively Assessed Housing Need in Question 3 and the need for changes to this in order for the Plan to be sound.

Policy SP5

Policy SP5 in relation to New and Strategic Infrastructure notes at paragraph 3.14 that “many of the existing roads are at, or near to, capacity.” It optimistically states that “some additional capacity may come about from promoting a change in behaviour.” The Transport Report prepared by TTHC on behalf of the North West Parishes Group agrees with the assumption in terms of the capacity of existing roads. It also notes that there may be higher levels of trip generation as a result of the proposed development, than assumed by the Essex Highways figures which support this Plan.

The TTHC Transport Report sets out the significant infrastructure pressure as a result of the proposed development, particularly in relation to sites at North East Chelmsford, West Chelmsford, Great Leighs and North of Broomfield. It is concluded that these would together generate a greater (and unreasonable) level of impact on the existing highway network than is assumed by the Essex Highways modelling in more than one area.

Furthermore, there is no improvement in terms of modal shift nor delivery of new infrastructure which would adequately mitigate this and therefore the Plan is not sound in this regard and the assumptions made.

Policy SP7

Policy SP7 in relation to the protection of the natural and historic environment, the Green Belt and valued landscapes, seeks to prioritise growth in the Urban Area, protecting the networks of biodiversity and green infrastructure in line with the Green Infrastructure Strategy. This strategy is generally supported; however, it has been set out in relation to paragraph 2.25, that there would have been a case for the review of the Green Belt and assessment of the merit of its partial release through this Plan process. This would have resulted in a comprehensive assessment of the proposed development potential of the whole Plan area, to ensure a fully justified Plan which had suitably considered all alternatives for growth.

Furthermore, although the Plan recognises that there are areas of ‘valued landscape’ it is unclear what level of assessment of these landscapes has been undertaken outside of the defined areas of Green Belt, Green Wedges and Green Corridors. Specific Landscape Character Assessments have previously been undertaken in some areas, for example by Broomfield Parish Council, but it is unclear if these have been considered in the identification of the areas for growth or the extent of localised landscape assessment which has been undertaken to support the preferred growth options. As such, the policy should specifically require or be supported by detailed Landscape Character Assessments of the areas of potential development in the Plan in order to be effective.

Paragraph 3.29 notes the aspiration to minimise the loss of the best and most versatile agricultural land, but to balance this against the other planning factors of sustainability and suitability for development of the location. It has been identified in relation to paragraph 2.26, that the majority of greenfield development proposed by this Plan is to the north of Chelmsford on higher grade agricultural land, allowing for the retention of lower grade agricultural land to the south. Noting that this area to the south is partially in the Green Belt, there are other challenges to the development to the north of the City Area, in terms of their reliance on the delivery of considerable infrastructure to achieve their development. These factors should have been subject of a comprehensive balancing

exercise to ensure that development is in the most sustainable location and meets this aspiration to minimise the loss of the best and most versatile agricultural land.

4 Vision and Spatial Principles

The Vision is generally considered to be sound.

However, the North and West Parishes Group has previously expressed concerns as to how aspirational this Vision is in terms of the future of Chelmsford. The Vision sets out the current position of Chelmsford following its restructuring as a City and subsequent change in focus of development and industry. It does not however present a clear and aspirational focus for the future of the City, which will incorporate significant infrastructure improvements, including the arrival of Crossrail and the delivery of a new railway station and which will significantly change the focus and connectivity of this City area. Furthermore, the Vision focuses heavily on the City and does little to acknowledge the integration with the countryside and particularly the more rural parishes and villages which make up this area.

It is therefore proposed that the Vision would be more Positively Prepared in reflecting the Plan and the future of the City area if it was to incorporate specific aims relating to the delivery of new infrastructure (including Crossrail and a new railway station) and the relationship with the more rural parishes and settlements in terms of integration and quality of life.

The Transport Report prepared by TTHC in support of these representations reinforces this approach, setting out the significant impact on existing infrastructure as a result of the proposed development around West Chelmsford, Great Leighs and North East Chelmsford, noting the lack of access to the centre of Chelmsford and the significant reliance on car use and access to the existing train station. It concludes that there are strong transport reasons for the justification of development in alternative locations, which would be more positive in transport terms and which should be reflected in the Vision for this Plan, to achieve integrated, sustainable development of the City area.

Strategic Policy S1 – Spatial Principles

The Spatial Principles are generally deemed to be sound, however the North and West Parishes Group has reservations as to how deliverable these will be in the context of the risks around the delivery of infrastructure. In order to be sound, the Plan must convincingly demonstrate the way it can fulfil these, through the extent, location and delivery of development, for example:

- Maximise the use of previously developed land for development – The North and West Parishes Group supports the intention to maximise development of previously developed land in the first instance. There is significant scope to deliver development in the existing towns before the release of land outside of these areas and the Council should be committed to demonstrating that this is being realised and that the necessary density of development is being achieved to at least meet the anticipated levels of development in these areas, to minimise the extent of greenfield development and to prevent the creep of greenfield development beyond that already planned for.
- Locate development at well-connected sustainable locations – The location of development in well-connected sustainable locations is strongly supported, however, there are risks in terms of achieving this in the current growth strategy. The growth north east of Chelmsford is specifically reliant on improvements to infrastructure which are currently uncertain in terms of their timing of delivery (namely the north east bypass). If the development of this area goes

ahead without this infrastructure, it will not be meeting this Spatial Principle. Consideration should therefore be given to the well-connected areas around Hammonds Farm and the A12 corridor and the A130 corridor, South of Chelmsford.

- Ensure development is deliverable – It has been noted that the major development area north east of Chelmsford is significantly reliant upon the delivery of infrastructure to support its sustainable delivery and operation. This is a risk in terms of its delivery as anticipated by the Plan, but this is compounded by the mixed land ownership in the area, which presents a further risk in terms of the deliverability of this development.
- Ensure development is served by necessary infrastructure – Again, the growth area north east of Chelmsford is reliant on significant infrastructure, the timing and delivery of which is currently uncertain, therefore the focus of development in this area is not consistent with this Spatial Priority. There are other sites around the A12 corridor which could be delivered on the basis of existing infrastructure and there is the potential for consideration of alternative sites linked to Crossrail and the new railway station, to the south of Chelmsford, which would serve any new development in these areas in a sustainable manner.
- Protect the Green Belt – The protection of the Green Belt is supported in principle, but it is also considered that there should have been a review of the Green Belt as part of this Plan process to ensure that the most suitable locations for development have been identified, balancing all considerations.
- Protect and enhance the character of valued landscapes – It is agreed that the Plan should seek to protect valued landscapes, however there are concerns as to whether sufficient evidence has been produced to analyse the value of landscapes outside of the Green Belt and the Green Wedges and Green Corridors. The landscapes beyond these designations are also of high quality and valuable character, which will be impacted by the proposed development, particularly to the West and North East of Chelmsford and North of Broomfield. It is not clear that this has been given adequate consideration in the preparation of this Plan to ensure that this Spatial Principle can be met.

Strategic Policy S4 – Policy S4 in relation to Neighbourhood Planning has been developed from previous drafts of the Plan and the recognition of the important role that Neighbourhood Plans play is welcomed. As set out in relation to paragraph 1.38, the Plan should be clear in setting out the expectations of Neighbourhood Plan groups or Parishes in terms of the delivery of development. These groups should also have sufficient autonomy to consider the detail of the provisions made, in the context of local need and evidence for this, so that they may best plan for their neighbourhood area. The Plan should be amended to this effect to ensure that it is Positively Prepared.

Strategic Policy S6 – The aspiration of Policy S6 to preserve and enhance the natural environment is supported. It is recognised that this will in part be achieved through the network of green infrastructure and noted that greater connectivity will be sought across the City through a network of high quality and accessible green spaces and corridors.

The North and West Parishes Group has concerns in relation to the areas of land in between these corridors and outside of the designated network of green spaces, which themselves have value as an environmental resource. The Plan should therefore allow for development options to consider the environmental resource beyond these boundaries and ensure a suitable level of impact on the environment throughout the Plan area. This is particularly relevant in the more rural areas outside of the urban area of Chelmsford City.

This policy should also make reference to Policy SP13 in relation to Green Corridors and Green Wedges for completeness.

6 How will Future Growth be Accommodated

S8 Housing and Employment Requirements

As set out in relation to Q1 and Q3 the North and West Parishes Group has concerns as to the changing context for housing calculations and the flexibility of this Plan to adapt to this at the relevant time.

It is noted that the Consultation Draft Plan has sought to include a 20% buffer above the OAHN figure to allow for any future change in the Council's target housing figure. Notwithstanding this, there is a risk in terms of the ability of the Plan to adapt to and accommodate a new housing figure should this become necessary, which may be the case early in the Plan period. There is a risk that in not planning adequately for this, there will be unsustainable resulting patterns of growth, for example the more extensive expansion of development areas, rather than the identification and delivery of additional development areas, to deliver this development in a sustainable manner.

There is already pressure on the areas of development identified in the Plan. It was the decision in the preparation of the Plan not to consider the Green Belt boundaries and allow for the release of Green Belt, even where it is in a sustainable location and linked to new forthcoming infrastructure. The Plan allows for considerable development on areas of higher grade agricultural land and the development of sites where there is a need for significant infrastructure provision to support their success. The Plan should therefore be identifying other areas of land which can be developed in a sustainable manner during the Plan period to allow for higher growth figures if needed, for example around the A12 corridor, in order for the Plan to be Positively Prepared.

The requirement at paragraph 6.9 to monitor and potentially review the Plan in the context of emerging national guidance, is a sound approach, but highlights the risk of the current approach, which may be addressed through the identification of additional sites which could deliver any shortfall in delivery during the Plan period. It is not enough to add a 20% buffer to the OAHN figure of 805, to boost supply and add flexibility to the provision. There needs to be certainty that any development can be accompanied by the right infrastructure, in the right places to achieve sustainable patterns of development to avoid the delivery of development through the 'spread' of existing development locations, which do not have the infrastructure provision to support additional development. This provision should be made now, to make the Plan sound.

The Spatial Strategy

Strategic policy S9

The Spatial Strategy seeks to focus new housing and employment growth in the most sustainable locations by making best use of previously developed land in the Chelmsford Urban Area, the development of sustainable urban extensions around South Woodham Ferrers and development around key service settlements outside the Green Belt.

The focus of growth within Chelmsford as a first priority is supported by the North and West Parishes Group.

The Group retains concerns about the growth North of Broomfield, but welcomes the reduced scale of this development since the earlier consultation on the Plan. This development must be delivered consistently with national policy, to ensure that it is sustainable and supported by the necessary social and transport infrastructure to achieve its success and an acceptable level of impact on the

existing community. This will include the delivery of associated infrastructure and landscape mitigation measures.

The Plan identifies only limited development around Boreham. As a result of its existing infrastructure links, this area would be able to deliver more development than identified in this Plan, subject of further testing, in the event that further sites need to be identified in the Plan to meet a higher housing figure in due course.

The North and West Parishes Group have concerns in relation to the development proposed at Writtle, to the extent that this will be capable of impact in terms of traffic through the village. There is concern as to the ability of the existing infrastructure to absorb these additional traffic movements and the resulting impact on the character of the village and pressure on local services. It is not considered that this has been adequately tested and reflected in the Plan to demonstrate that this development is justified.

Location / Site 4 (North East Chelmsford)

The North and West Parishes Group has considerable concerns in relation to the proposed development at Location/ Site 4 (North East Chelmsford). This has been set out in previous representations and, whilst noting the progression of policy since this time, it is still considered that the development of this location presents considerable risks and is not justified.

The extent of development proposed in this location places too great a development burden on this area of Chelmsford. There is significant risk in terms of its delivery as a result of complex land ownership circumstances and it relies heavily on significant infrastructure provision to achieve its future success.

It is an isolated location, which will not link with the existing surrounding communities, yet will impact them as a result of the associated traffic and increase in population, as set out in the accompanying Transport Report prepared by TTHC on behalf of the North West Parishes Group.

It also requires development on higher grade agricultural land, degradation of Green Wedges and Green Corridors and as such will impact on the communities and landscape of the areas to the north of Chelmsford.

For these reasons, the Plan should also be considering additional sites where development can be brought forward alongside the delivery of Location/ Site 4, such as Hammonds Farm, to relieve some of the pressure on this area and create further options for growth in terms of market delivery.

Great Leighs

The development of Great Leighs is deemed acceptable in principle, however it must be accompanied by the necessary infrastructure to ensure that it does not impact surrounding villages and to ensure the delivery of sustainable development. The Transport Report prepared in support of these representations by TTHC clearly sets out the risks in this regard. Having assessed the trip generation, TTHC consider that the trips in the morning peak time would have the potential to add to rat running through the unclassified roads such as Boreham Road and Goodmans Lane or via the B1008 through Broomfield, as a result of the existing and potentially increased congestion on the A131/A130 Essex Regiment Way.

There is also evidence that other junctions would operate over capacity as a result of the proposed development and that this would be exacerbated in the event that the North East Bypass did not come forward. This suggests that the proposed allocations rely on the delivery of the Chelmsford North

Eastern Bypass, which itself is uncertain. In this context, there is potentially significant impact as a result of the proposed development areas around Great Leighs.

Location/ Site 6: (North of Broomfield)

Previous representations by Broomfield Parish Council and the North and West Parishes Group have highlighted the considerable concerns in relation to the development of this area to the north of Broomfield, in terms of the impact on the existing community, pressure on infrastructure and roads and degradation of the surrounding landscape.

Although there remains an objection to this development in Broomfield, the reduction in scale of development anticipated in this location from earlier drafts of the Plan is welcomed and is considered to more suitably reflect an appropriate level of development in this area, in the context of a growth strategy which locates development around existing settlements. There remain reservations as to the potential impact of this development on the local community and infrastructure provision and it is proposed that the detail of development is refined through a Neighbourhood Plan process, which should also have the ability to look more closely at the Green Corridors and landscape impact of development in this context.

The North and West Parishes Group has concerns as to the scale of the Defined Settlement Area identified. The area designated has not been reduced commensurately with the reduction from 800 to 450 units intended to be brought forward. It is suggested that, although this will doubtless be subject to more detailed masterplanning at the relevant time, this is not a justified approach to this development area. It would be more appropriate to either reduce the allocated area or specify the use of some of this allocation, for example the western section, as a wooded landscape area outside the defined settlement area. This approach would provide mitigation for the impact on Puddings Wood as a result of the construction of the Hospital Access Road. This would also be reflective of the landscape character of this area, which, as defined in the Broomfield Landscape Character Statement and the attached Statement of Common Ground from the NCAAP Examination in Public.

The proposal for a new access road to the Broomfield Hospital as part of this development must be an imperative of this proposed development to deliver improvements to highways infrastructure in this area to support its future development. This road should be required as part of a package of infrastructure improvements which would be brought forward alongside this development to mitigate the negative impact on the surrounding roads and infrastructure and existing community. This should include the downgrading of other roads locally to ensure that the new road infrastructure is used as anticipated and to the wider benefit of the existing area.

The Transport Report by TTHC, on behalf of the North and West Parishes Group, sets out the impact in terms of highways capacity as a result of this development, but notably in terms of the potential worsening congestion on the B1008 corridor (which is already at 96% capacity) as the principal access route to the Broomfield Hospital.

The report prepared by TTHC in support of these representations states at paragraph 8.6, that "The traffic flows show that the proposed allocation [at North Broomfield] would generate around 200 vehicle movements in each peak hour. Around 75% of this traffic would head south on the B1008 through Broomfield, representing an increase of 8-10% over the 2036 Base flows. This is without any additional traffic which would be generated by the Great Leighs sites in the absence of the CNEB northern section."

It notes that there would be a net reduction in traffic at the B1008/ Hospital Road junction as a result of the new access road, but that there would still be a net increase in traffic on the B1008 corridor between the Hospital Approach and the city centre, which is of particular concern in an area where the B1008 is already operating at near to full capacity.

Although the reduction in scale of development at Broomfield through the Plan process represents a more appropriate level of growth than was previously identified for this area, it is still considered that there are more appropriate locations to accommodate this growth, which could be achieved with less impact, around existing transport nodes, for example at Hammonds Farm.

Paragraph 6.31 summarises the loss of agricultural land as a result of the proposed Spatial Strategy. These representations by the North and West Parishes Group have set out in relation to paragraphs 2.26 and 3.29 the concerns in terms of the strategy which allows for the significant development of areas known to be of higher grade agricultural classification. The Plan specifically focuses growth to the north of the City area where the agricultural classification of land is higher than to the south. It is acknowledged that a balance needs to be struck between a variety of priorities in the location of growth areas and that the area to the south of Chelmsford is partially in the Green Belt, albeit of lower agricultural land classification. However, these representations have set out the case for a Green Belt review in the context of the good levels of infrastructure provision to the south and the potentially more limited impact as a result of development in this arguably more accessible and sustainable location, which will meet future growing commuter demand. On balance, therefore, the higher Grade of agricultural land to the north of Chelmsford adds weight to the case for consideration of a Green Belt review and location of further development in these southern areas, to relieve pressure on higher grade agricultural land to the north, which would lead to a more justified Plan.

6.38 Growth Area 2

SGS4 - North East Chelmsford

The Plan states that North East Chelmsford (Location 4) will continue to be the location for significant new development growth. This area is evidently part of a long-established growth area, with planned development both in this Plan period and for a further 2,500 homes after the Plan period beyond 2036 (paragraph 6.39). It is also noted however that the timing and phasing of this development will have to be considered through a review of the Plan.

The North and West Parishes Group has significant concern in relation to the scale of growth in this location and the potential impact of it on the surrounding area. There are a number of uncertainties and impacts of this development, which can be summarised as follows:

- The delivery and success of this site is heavily reliant on infrastructure provision, namely the delivery of the Chelmsford North East Bypass. There appears to be no certainty at present as to the timing and delivery of this key infrastructure, without which this development will be unsustainable.
- The site is in multiple land ownerships and although these parties are understood (from the supporting evidence to the Plan) to be working together in the pursuit of this site, there are inherent risks in relying upon a number of parties for the delivery of development.
- The significant weight of development in this location is an inherent risk, which would be lessened by spreading some of the burden of development pressure around the wider City area, for example in other locations known to be capable of delivery of development without significant infrastructure demands (such as Hammonds Farm).

- The focus of significant growth in one location such as this will impact market delivery, which would better support a range of development types in different market areas to achieve more expedient delivery. I.e. development would be more likely to be delivered more quickly, if it was in more than one location.
- It is in an isolated location and although the Plan aims to create a sustainable Garden City development, it risks being physically and socially isolated from the surrounding existing largely rural communities which make up this area to the north of Chelmsford.
- It is noted that part of the area is subject of mineral extraction, the timing and extent of which is not defined and therefore the timing of delivery of development in this area is unknown.
- The extent of supporting infrastructure is undefined in terms of scale, type and timing. If this is not carefully planned and delivered, there will be considerable impact on surrounding communities, which are already under severe pressure in terms of their infrastructure and facilities.

The North West Parishes Group therefore retains significant concerns as to the weight placed on the development at North East Chelmsford. It is set out in these representations that there is merit in the consideration of other sites, such as at Hammonds Farm, to spread some of this development burden in a more sustainable manner. The consideration of additional sites to address some of these issues and lessen the burden on North East Chelmsford, would represent a more justified approach to the Plan.

Paragraph 6.41 states that; alongside Great Leighs (Location 5), this allocation will help deliver the strategic infrastructure, including the Chelmsford North East Bypass. The Transport Report prepared by TTHC on behalf of the North and West Parishes Group sets out the risks in terms of the delivery of the CNEB. The allocations at North East Chelmsford, Great Leighs and North of Broomfield all require contributions to be made to the delivery of the CNEB route. The full route had previously been intended to be a continuous grade separated route between the A131 at Great Leighs and the A12 at Boreham, to provide additional capacity and network resilience between Braintree and Chelmsford.

However, the Essex Highways PO Addendum, which supports this draft Plan, only includes the delivery of a partial scheme at the northern end of the safeguarded route. This has two significant impacts in terms of; the lack of mitigation for the congested conditions which will arise on the A131 and B1008 corridors and the reduction in the quantum of development which can be achieved at North East Chelmsford.

Even the delivery of this section of the CNEB is dependent on contributions from several different allocations, thereby requiring their timely development for funding, which would significantly affect the delivery of the extent of development planned at North East Chelmsford, which is similarly reliant on the delivery of a new train station at Beaulieu Park, which is already known to be delayed from 2022 to 2025.

There are therefore significant concerns as to the level of growth which can and will be achieved in a sustainable manner at North East Chelmsford in the Plan period.

Infrastructure

These representations on behalf of the North and West Parishes Group are supported by a separate Transport Report, prepared by TTHC in support of the case set out in these representations. It sets out the specific transport and infrastructure concerns of the Group, in relation to this Pre-Submission Draft Plan.

Comments are also made in relation to infrastructure provision as relevant in relation to the relevant Strategic Policies and Site Allocation Policies.

It is absolutely agreed that to achieve the sustainable future growth of Chelmsford, new development must be supported by the provision of infrastructure, services and facilities that are identified as necessary to serve its needs, as set out in Strategic Policy S11.

In terms of Transport and Highways, Strategic Policy S11 identifies a highways infrastructure which should form part of the Plan. The wording of this policy is not however sufficiently robust to reflect the need for this infrastructure to support the development in the Plan. For example, we have set out in relation to the development in North East Chelmsford the need for the improvements to the highways infrastructure in this area through the development of the Chelmsford North East Bypass to support the development in this area.

Similarly, the new access road to the Broomfield Hospital is imperative in delivering the proposed growth at Broomfield.

The policy should therefore be more strongly worded to ensure that the delivery of this infrastructure is a priority to ensure an effective Local Plan.

The specific requirements for this infrastructure is set out in the accompanying Transport Report by TTHC, which accompanies these representations and which forms part of the representation to this Policy.

It is also noted that the Plan does not make reference to the delivery of a new Crossrail station at Shenfield, which is also considered to form part of the new infrastructure which will influence and improve the accessibility and demand for development in the Plan period and which should be reflected in the Plan.

Strategic Policy 13: The Role of the Countryside

This policy clearly defines that there will be no review of the Green Belt in this Plan. Previous representations by the North and West Parishes Group and the parishes therein, have set out the case as to why this review should have been undertaken in the context of the development strategy proposed.

It has been set out in these representations in relation to paragraph 2.25 that there is a case for there to have been a Green Belt review as part of this Plan process to ensure that a justified approach has been taken.

It is recognised that there would be impacts in terms of the release of Green Belt land or future development of the Green Belt, but in order for the Plan to be justified, this should be balanced against the impacts of development in other locations.

There are relative merits in terms of the development of higher grade agricultural in the non-Green Belt northern areas. Furthermore the south of Chelmsford, which is partially in the Green Belt, is a more physically sustainable location, which is more accessible to the prime commuter areas and will only become more valuable and in demand on the opening of Crossrail to the west and the new Chelmsford station to the east during this Plan period. These factors are exceptional circumstances which would and should have justified a Green Belt review to look at the scope for focussing further development in this area during the Plan period.

The decision to retain the Green Belt and create a series of Green Wedges and Green Corridors has significantly narrowed the potential development areas in the Plan. For this Plan to be justified, it should have considered all potential development areas and then identified the areas for protection in this context.

In terms of Green Wedges; at the Issues and Options stage, the North and West Parishes Group proposed that the River Can Green Wedge be extended upstream, north west of Writtle as part of a Green Corridor. This proposal is not reflected in the Amec Foster Wheeler “Green Wedges and Green Corridors” document, February 2017. It is strongly considered that this inclusion would reflect the aspirations of the Plan, in terms of the inclusion of important river valleys and flood plains as structurally important areas of land which influence the form and direction of urban development. The Study did not consider this inclusion, nor explain the reasons for excluding the upper reaches of the Can Valley, which would be in accordance with policy aspirations and needs to do so, in order for the Plan to be justified.

Furthermore, the AFW Report goes on to state that the “definition of the extent of the City’s Principal River Valleys along their length within the City Council boundaries is a starting point for the protection of these as distinctive entities.” (paragraph 4.2). The extension of a Green Corridor along the length of the River Can is clearly not compatible with SGS2, West Chelmsford (Warren Farm) which would extend development into the countryside beyond an already well-defined urban edge. Furthermore, the landscape evidence base assesses the Warren Farm site to be sensitive to development, but there is no boundary for the further expansion of this development to the north and west of the site in the future. This should be clearly defined in policy.

7 Where will Development Growth be Focussed?

The North and West Parishes Group set out their concerns in relation to the proposed options at earlier stages of the Plan preparation process. Although the Spatial Strategy has evolved and is an amalgamation of those set out in the Issues and Options Paper, it still does not reflect the focus of growth which the North and West Parishes Group believes to be the most sustainable and suitable to meet the future needs of this area, whilst protecting and enhancing its existing character and assets.

These representations have set out the significant concerns which remain in the context of:

1. The lack of Green Belt review.
2. The burden of development at North East Chelmsford.
3. The necessary infrastructure being unlikely to be delivered in time to support the development sought at North Chelmsford and the funding requirement for infrastructure being uncertain.
4. The deliverability of sites in the Plan period.
5. The sustainability of the chosen locations.
6. The protection of areas of landscape value.

These representations have set out the way in which the Plan is not justified, having not considered all reasonable alternatives for development.

It is strongly proposed by the North and West Parishes Group that there is an alternative growth strategy for this Plan, which places more emphasis on development around the A12 corridor and the new railway station. The location of development around new and planned infrastructure represents a more sustainable pattern of growth than that which relies on the delivery of significant new

infrastructure, the timing and process for which is uncertain and therefore undermines the growth strategy of this Plan.

The North and West Parishes Group has set out in these representations that this alternative approach could justifiably include a Green Belt review to fully investigate the relative merit in some development in this southern area and through the additional identification of development around Hammonds Farm, to release pressure on the delivery of development to the extent sought at North East Chelmsford.

Strategic Growth Site 2 – West Chelmsford

Previous representations to the Chelmsford Local Plan by the North and West Parishes Group at Issues and Options and Preferred Options stages, set out their concerns in relation to the proposed development at West Chelmsford. This is not a sustainable location for growth and the nature of this proposed growth is not in keeping with the rural nature of this location.

The most significant issues relate to:

- Increased traffic generation – The allocation would result in higher traffic generation than assumed by the Essex Highways modelling and would result in impact on the A1060/ Lordship Road junction, for which there is no mitigation proposed and significant additional vehicle movements between Lordship Road and Writtle in peak hours, resulting in congestion in this area.
- Modal Shift - there is no evidence to justify the assumptions of the Traffic Modelling that bus priority measures and encouraging people to walk and cycle will solve the problems at junctions and traffic congestion on the A1060, Lordship Lane and Chignal Road. The A1060 from the junction of Chignal Road and the city centre is too narrow to allow bus only lanes.
- The site is not connected to the cycle and walking path that runs along the River Can to Chelmsford - this would entail crossing the busy A1060.
- Landscape sensitivity – there is an established clear separation of the urban/rural boundary and this site is located in a rural area, but the proposed development is an extension of the urban development pattern with the associated impacts, which are not appropriate in this area.
- Loss of Grade 2 best quality agricultural land, which has been raised as a general concern in relation to this Plan, but which is exacerbated by this proposal.
- The existing local infrastructure, for example doctor's surgeries, do not have the capacity to absorb additional growth in this location. The additional infrastructure requirements generated by this allocation should be identified in the Plan.

The previous representations by the North and West Parishes Group also set out the constraints of this site in the context of the identified Mineral Safeguarding Area. It is understood that Essex County Council have identified that this site is not economically viable for extraction and that therefore this is no longer a constraint on the development of this site. It is however unclear from the information available as to the justification for the removal of this allocation and the planning policy context having been amended to support this. This therefore appears to still represent a potential constraint on the delivery of this site.

There are strong reasons that the development of this area is not in accordance with the aims of this Plan, nor that it is justified. We have set out elsewhere in these representations, the reasons that consideration should have been given to a Green Belt review in order to establish the most appropriate locations for growth in the Plan period.

The Landscape Sensitivity and Capacity Assessment (2017) undertaken to support this Plan assesses the sensitivity and capacity for development of land within the Council's area (broadly based on the Issues and Options Spatial Options). The Sustainability Assessment uses these assessment results to inform the sites identified for future residential and employment growth. The SA identifies that all the preferred site allocations are considered as having capacity to accommodate development, noting that parts of a small eastern area of West Chelmsford are within area of low or low to medium landscape capacity.

At paragraph 5.4.7 of the SA identifies that a substantial area of greenfield land will be required to accommodate strategic growth sites including West Chelmsford and as a consequence, an overall significant negative effect has also been identified in respect of land use with a negative effect on landscape and townscape, which reflects the size of the site and its greenfield location, as such, West Chelmsford has been assessed as having a significant negative effect on SA Objective 14 - landscape. It also has been assessed as having a significant negative effect on waste and resources (SA Objective 12) due to the location within a Minerals Safeguarding Area.

Although West Chelmsford is identified as a development location, it is not the most sustainable location for growth. There are significant impacts on landscape and environment as a result of the proposed development, which will also have significant challenges in terms of infrastructure delivery and sustainable travel.

There are not adequate mitigation measures secured in the planning policy to address these considerations and as such, if the Plan had been justified in giving adequate consideration to alternative sites for development, the relative impacts of this site would have been suitably considered. It is therefore the case that alternative sites, where these are located close to existing infrastructure and in locations better able to accommodate additional growth in a sustainable manner, would be more suitable for this growth than the extension to the West of Chelmsford.

Strategic Growth Site 4 – North East Chelmsford

As set out in relation to paragraph 6.38 and Location 4/ North East Chelmsford, the North and West Parishes Group has significant concern in relation to the scale of growth in this location and the potential impact of it on the surrounding area. There are a number of uncertainties and impacts of this development, which can be summarised as follows:

- The delivery and success of this site is heavily reliant on infrastructure provision, namely the delivery of the Chelmsford North East Bypass. There appears to be no certainty at present as to the timing and delivery of this key infrastructure, without which this development will be unsustainable. The evidence prepared by TTHC in support of these representations demonstrates the uncertainty not only in terms of the timing of delivery of this infrastructure development, but also the impact of this in terms of the capacity of development which can be delivered sustainably in this area in the Plan period as a result.
- The site is in multiple land ownerships and although these parties are understood, from the supporting evidence to the Plan, to be working together in the pursuit of this site, there are inherent risks in relying upon a number of parties for the delivery of development.
- The significant weight of development in this location is an inherent risk, which would be lessened by spreading some of the burden of development pressure around the wider area, for example in other locations known to be capable of delivery of development without significant infrastructure demands (such as Hammonds Farm).

- The focus of significant growth in one location such as this will impact market delivery, which would better support a range of development types in different market areas to achieve more expedient delivery. I.e. development would be more likely to be delivered more quickly, if it was located in more than one location.
- It is in an isolated location and although the Plan aims to create a sustainable Garden City development, it risks being physically and socially isolated from the surrounding existing largely rural communities which make up this area to the north of Chelmsford.
- It is noted that part of the area is subject of mineral extraction, the timing and extent of which is not defined and therefore the timing of delivery of development in this area is unknown.
- The extent of supporting infrastructure is undefined in terms of scale, type and timing. If this is not carefully planned and delivered, there will be considerable impact on surrounding communities, which are already under severe pressure in terms of their infrastructure and facilities.

The North and West Parishes Group therefore retains significant concerns as to the weight placed on the development at North East Chelmsford, which is not adequately reflected in the associated Policy. As such, it is proposed that the consideration of additional sites to address some of these issues and lessen the burden on north east Chelmsford, would represent a more justified approach to the Plan.

Strategic Growth Site 6 - North of Broomfield

It has been set out that the proposal for the development of 450 homes at Broomfield is still opposed by the North and West Parishes Group, but that in the context of the previously higher growth figure suggested, the level proposed in this Plan is more acceptable, where it can be shown to be supported by the relevant infrastructure and the delivery of the new hospital access road. Fundamentally, however the Parishes believe there are alternative, more sustainable locations for this growth to be located, adjacent to existing infrastructure, for example at Hammonds Farm.

As set out in relation to Site/ Location 6, North of Broomfield, the North and West Parishes Group retains concerns in relation to the development in this location, despite the reduction in scale from previous drafts of the Plan.

There remain reservations as to the potential impact of this development on the local community and infrastructure provision (the B1008 already being at 96% capacity) and it is proposed that the detail of development is refined through a Neighbourhood Plan process, which should also have the ability to look more closely at the Green Wedges and Corridors and landscape impact of development in this context.

The proposal for a new access road to the Broomfield Hospital as part of this development is an imperative of this proposed development in order to deliver improvements to highways infrastructure in this area to support its future development. This road should be required as part of a package of infrastructure improvements which are brought forward alongside this development to outweigh the otherwise potentially negative impact on the surrounding roads and infrastructure and existing community. This should include the downgrading of other roads locally to ensure that the new road infrastructure is used as anticipated and to the wider benefit of the existing area.

The Transport Report by TTHC has set out the risks to Broomfield as a result of this proposed development, in terms of congestion and highways impact, as set out in the context of Location/ Site 6. The policy needs to address these potential issues in terms of congestion and rat running in order to be sound in its assumptions in terms of growth in this location.

Protecting the Countryside

Policy CO1: Green Belt, Green Wedges, Green Corridors and Rural Areas

Previous representations have set out the reasons why a Green Belt review would have been appropriate as part of this Plan process. The Plan has instead sought to deliver the required development mainly through a new Garden Settlement to the north of Chelmsford, avoiding development in the Green Belt. This approach places significant risk in terms of the delivery of future development, in the context that there is uncertainty as to the delivery of the infrastructure needed to deliver the development suggested by the Plan, which has not been informed by a full Green Belt review. It has therefore been stated as to why a Green Belt review should have been undertaken as part of this Plan process, in order to ensure that it is a justified approach to development. This is set out further in relation to Policy SP13.

4. Representations to Draft Sustainability Appraisal

The North and West Parishes Group have reviewed the Sustainability Appraisal (SA) which accompanies the Plan, in the context of their representations on the Pre-Submission Draft Local Plan. The SA notes that the proposals in the Plan have generally positive effects in terms of the delivery of homes and jobs, however, the North West Parishes Group retain concerns in relation to the detail of this and the assumptions made in the Plan and the evidence supporting this in the SA. These relate to matters including Green Belt and agricultural land, pressure on facilities and infrastructure and the locations for growth (particularly at North East Chelmsford and the rejection of the site at Hammonds Farm).

In terms of Green Belt and development of agricultural land, the SA notes the extent of loss of greenfield sites and of the higher grade agricultural land around the City, to the effect that the Plan will result in; “a loss of approximately 446 hectares (ha) of Grade 3 agricultural land and approximately 252 ha of Grade 2 land (land in grades 1, 2 and 3a is classified as the best and most versatile agricultural land at Annex 2 of the National Planning Policy Framework).” This is reinforced by the statement that; “Cumulatively, despite the extent of brownfield sites, development will result in the loss of a substantial area of greenfield land including that which is best and most versatile.”

The North and West Parishes Group has set out in their representations to the Pre-Submission Draft Plan, that they retain concerns in relation to the approach of the Plan which proposes the loss of higher grade agricultural land over the loss of Green Belt, Green Wedges and Green Corridors. It is therefore proposed that the Plan should have undertaken a Green Belt review to assess the relative merits of this approach to ensure that it is justified.

The SA tests the Growth Areas, noting that, although there is some impact, this is minimal in terms of significant adverse environmental effects, whilst achieving delivery of significant growth. The impact is deemed to be minimised through the characteristics of individual sites and also the delivery of development in/adjacent to urban areas and Key Service Settlements, which have greater capacity in terms of their sustainability to receive growth. It is the North and West Parishes Group’s view that there is inconsistency in the definition of these Key Service Settlements. Although they are treated similarly in terms of the amount of development they should or could accommodate, the settlements themselves considerably vary in terms of the existing scale and facilities, therefore the increase in growth is not of the same or comparable impact.

It is identified that, without mitigation, the impact of the proposed growth could place pressure on key services and facilities. The impact on existing communities and infrastructure and facilities is a key concern of the North and West Parishes Group and it is vital that the delivery of development is supported by adequate services and facilities and transport infrastructure to sustain the level of growth.

Again, there is concern over the identification of the potential adverse environmental effects (and in some cases, significant negative effects) on the environment as a result of the proposed development. It is noted that the SA suggests this can be mitigated through improvements at a project level, but this will need to be strongly enforced by the City Council in the granting of planning permissions, supported by greater detail in the Plan as to the extent and nature of mitigation measures which will be required.

Paragraph 5.3.17 sets out the risks and benefits of the approach to the housing numbers, noting that the Option 3 in the Issues and Options draft of the Plan would have had more significant sustainability impacts. This is agreed, given that this had the highest growth figures, however it is

questionable as to whether the level of housing numbers is right and the extent to which this will need to be altered again in the context of a change in the means of calculation of housing figures. The North and West Parishes group has set out the risk of this and the uncertainty that this places on the impact of the Plan and the need for further acknowledgement of this in the Plan in their representations to the Draft Plan.

Paragraph 5.4.12 considers the impact of growth at North Chelmsford. It notes that; "Like Growth Area 1, the scale of housing and employment growth proposed in North Chelmsford has been assessed as having an overall significant positive effect on housing (SA Objective 2) and employment (SA Objective 3). The majority of the proposed site allocations in Growth Area 2 are also well served by community facilities and services and have therefore been assessed as having a positive effect on sustainable living and revitalisation (SA Objective 4)."

It notes that: "A total of four site allocations (and one existing commitment) have been assessed as having a significant negative effect on biodiversity (SA Objective 1). This reflects their location adjacent to/including local wildlife sites and Ancient Woodland and the potential for effects on associated habitats and species due to, for example, land take, recreation and noise. However, some uncertainty remains."

The North and West Parishes Group has expressed considerable concerns in relation to the proposed development at North East of Chelmsford, in terms of the scale and nature of development and the delivery challenges of this. It is acknowledged that if it was to come forward as anticipated, it will have benefits in terms of housing and employment delivery, however there are significant risks in terms of the delivery of this site and the associated required infrastructure, which is not fully reflected in this SA.

Other sustainability impacts of this development have been identified in relation to a significant negative effect on water (SA Objective 8), due to their close proximity to waterbodies, and waste and resources (SA Objective 12), owing to their location within Minerals Safeguarding Areas.

Furthermore, it states that: "The proposed site allocations in this Growth Area have been assessed as having largely negative effects on cultural heritage (SA Objective 13) and landscape and townscape (SA Objective 14). Five sites (North East Chelmsford and proposed allocations in Great Leighs) have been assessed as having a significant negative effect on cultural heritage (SA Objective 13) due to designated heritage assets being within/in close proximity to these sites. The majority of these sites have also been assessed as having a significant negative effect on landscape and townscape (SA Objective 14)."

There are therefore considerable impacts as a result of this proposed development, which are not reflected in the Plan.

Options for Growth

In terms of the options for Growth, the North and West Parishes Group has previously set out and reiterated in representations the potential for an alternative option which focusses growth around the A12 corridor at Hammonds Farm, as an additional location for growth, to reduce the pressure and impact of North East Chelmsford, particularly in the event that it is not delivered at the rate and extent anticipated. There are other similarly well connected sites, such as at Boreham, Howe Green and Rettendon, which are also not adequately reflected and considered in this Plan.

Hammonds Farm

The SA considers the development proposed at Hammonds Farm, but does so as a substitution for the growth at North East Chelmsford, whereas the North and West Parishes Group proposes that it could be an additional location, to spread the burden of this growth and facilitate higher growth figures if required.

The SA identifies that; “Hammonds Farm is a large development being promoted by landowners at a location east of the A12 Chelmsford By-pass between Sandon and Boreham.”

It is identified as being of high landscape sensitivity, but that it is on the A12, Maldon Road and the A414. The SA deems these to be at capacity, but detailed evidence by the promoters of this site deems these roads to have capacity to accommodate the development of this site.

Positively, the SA identifies that a new settlement at Hammonds Farm could mean that benefits arising from development on the edge of the Chelmsford Urban Area are reduced as a large proportion of new development would be detached from the existing urban area, which could lead to an increase in car/traffic movements to those facilities in the city centre.

The site is relatively close to the proposed new rail station at Beaulieu Park, which has not been adequately reflected as a benefit in terms of the sustainability of this site.

The SA acknowledges that the responses to consultation on previous drafts of the Plan have set out significant support for a potential new settlement of up to 5,000 new homes at Hammonds Farm, which is not reflected in the decision to reject this site from the Plan. This decision is not supported by the North and West Parishes Group, who assert that there is merit in the pursuit of the development of this site to meet future growth requirements in a sustainable manner.

Appendix G

G16 Appraisal of Sites

Appendix G of the Sustainability Appraisal reviews the sites which have been excluded from or included in the Plan and the reasons for this. The representations by the North and West Parishes Group have clearly set out the support for the development around the A12 corridor, which would represent a sustainable location for growth, which is not constrained by the need for delivery of new infrastructure and which would lessen the burden for the delivery of development to the North East of Chelmsford.

Hammonds Farm has been excluded from the Plan and the reasons for this set out in the SA are as follows:

- Separation from Chelmsford by the A12.
- Traffic burden on the A414.
- Impact on Junction 18 of the A12.
- Impact on the City Centre Station (due to distance and separation from Beaulieu).

It is believed however that these issues can be addressed and that, when balanced against the other factors, this area still represents a viable development location, which should be suitably considered as a location for growth, on the basis of the development which can be brought forward in the context of the existing infrastructure development to deliver a sustainable location for growth which would reflect the wider aspirations of the Plan.

North Chelmsford Area Action Plan (NCAAP)

Examination in Public – Matter 3

Statement of Common Ground between Broomfield Parish Council, Great Waltham Parish Council, Little Waltham Parish Council and Chelmsford Borough Council

In respect of Site Allocations and Methodology in North West Chelmsford and Broomfield

1. Purpose

The purpose of this Statement is to outline areas of agreement between Broomfield, Little Waltham and Great Waltham Parish Councils and Chelmsford Borough Council in respect of the NCAAP strategy for North West Chelmsford, namely:

- The limit on the number of proposed dwellings in North West Chelmsford and Broomfield to a maximum of 800 dwellings as set out in para. 2.3 of the NCAAP Proposed Submission document
- The dispersed approach to site allocations
- The unsuitability of certain rejected sites, particularly the area of Pleshey Farmland Plateau between Broomfield, Little Waltham and Broads Green (Great Waltham).

2. The limit on the number of proposed dwellings in North West Chelmsford and Broomfield

All parties are aware of their respective positions in relation to the Core Strategy. However, it is accepted that an agreed level of development has now been determined by the adoption of that Strategy.

In North West Chelmsford, the NCAAP allocates up to 800 dwellings spread across 4 Site Allocations. This upper limit reflects a number of constraints on development in the North West area, these include:

- The sensitivities of the landscape of the Pleshey Farmland Plateau and the Chelmer River Valley. The characteristics of these landscape areas are set out in broad terms in the Borough Council's Landscape Character Assessment. Further detail for the Parish of Broomfield (particularly the views of parishioners on the role and value of landscape character areas) is set out in the Broomfield Community Landscape Character Statement
- The constraints of the road infrastructure in the area, particularly the B1008
- Other infrastructure constraints, for instance sewerage capacity.

The Parish Councils are in agreement with the NCAAP Strategy to impose a maximum limit to the number of new dwellings in North West Chelmsford. Given the constraints set out in the NCAAP, all parties agree that it would not be appropriate for more than 800 dwellings to be allocated in North West Chelmsford; and that up to 800 dwellings are only possible given the dispersed approach set out in the Plan.

3. The dispersed approach to site allocation

The Parish Councils support the dispersed development pattern of the sites allocated in North West Chelmsford.

The NCAAP Proposed Submission Document notes (para. 2.24) that in the absence of any planned major highway or transportation interventions (which would in themselves have an adverse impact on landscape character), it is important to disperse the traffic impact of new developments across a wider area. The Parish Councils are in agreement with this.

The Parish Councils also agree that a dispersed approach reduces the impact of the development on the landscape, as a centralised development of 800 dwellings would have a hugely detrimental impact on the Pleshey Farm and Plateau or Chelmer River Valley. Given the constraints of the Chelmer River Valley Green Wedge, the other possible locations for a centralised development are limited and would be likely to lead to the coalescence of either north Chelmsford and Broomfield, or Broomfield and Little Waltham (and possibly Broads Green in Great Waltham).

The Parish Councils also agree that the dispersed approach with four discrete site allocations is the most sound approach because it enables a greater degree of flexibility.

The dispersed approach also enables a range of community benefits, including some development at Broomfield Hospital and some in Broomfield village to support new community facilities, whilst also making greater use of existing facilities within the Principal Neighbourhood Centre at Newlands Spring.

All parties therefore agree that a centralised approach to development in North West Chelmsford would be less sound and would lead to significantly worse impacts on the local landscape and infrastructure.

4. The unsuitability of certain rejected sites

A number of alternative sites have been promoted by landowners and developers throughout the preparation of the NCAAP. Broomfield, Great Waltham and Little Waltham Parish Councils are opposed to developments that lead to the coalescence of settlements and the loss of significant areas of countryside. The Parish Councils therefore strongly support the Borough Council's decision through the NCAAP to reject the proposal for a large centralised development north and west of Broomfield Hospital.

This area of Pleshey Farm and Plateau is currently unspoilt countryside, with Woodhouse Lane and the gradually rising land of the Plateau forming a natural boundary with the Hospital and Hospice sites. Due to the relief, the Plateau is also highly visible, which increases its sensitivity to adverse change.

All parties therefore feel that this site is less sound than the sites proposed in the NCAAP for the following reasons:

- Lack of evidence of the need for Hospital-related housing, beyond that already provided for in the NCAAP

- Remoteness of the site from the wider transport network and facilities in Chelmsford town centre
- Significant impact on traffic levels using the B1008
- Lack of synergy with existing settlements
- Loss of opportunities to create better community facilities and a local focus in the Angel Green area of Broomfield, in particular the opportunity to rebuild the local primary school as a 2-form entry school on an adjacent site
- Difficulty of a new settlement of up to 800 houses to offer a good range of community facilities in the long-term, especially a primary school
- Likelihood that the settlement would need to grow to support such facilities in the future, increasing the problems listed above and potentially impacting up on the adjacent archaeological site

5. Conclusion

In conclusion, as the adopted Core Strategy and consequent development of up to 800 dwellings in this area is a given, the Parish Councils and Chelmsford Borough Council agree that the pattern and location of site allocations set out in the NCAAP Proposed Submission Document represent the most appropriate and Sound option available.