Chelmsford Local Plan 2021-2036.

The Issues and Options Consultation document – a summary

Question1

Do you think that Section 3 provides an adequate range of facts and figures about Chelmsford today? If no, please explain why.

VISION

Provide housing and job opportunities for all sectors of the community Promote healthier, inclusive and more active lifestyles Enhance cultural and leisure activities Ensure that the right type of development is in the right place Deliver the necessary supporting infrastructure Provide high quality public and private spaces Maintain and enhance a more sustainable environment.

Question 2

Do you support what should drive the new Local Plan Vision? If no, please explain your answer and suggest any changes

Question 3

Do you agree with what should be covered in the Vision? If no, please explain your answer and suggest any changes.

Question 4

Do you have any comments on how the Council has calculated its Objectively Assessed Housing need? Please explain your answer.

Question 5

Do you have any comments on the housing number (930 homes per year) used for testing in this consultation? Please explain your answer.

Question 6

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

Question 7

Do you have any comments on how the Council has calculated its job requirement number? Please explain your answer.

Question 8

Do you have any comments on the job requirement n umber (887 jobs per year) used for testing in this consultation? Please explain your answer.

Question 9

Do you have any comments on how the Council has calculated its retail capacity forecasts? Please explain your answer.

Question 10

Do you have any comments on the retail floor space requirements used for testing in this consultation? Please explain your answer.

Question 11

Do you have any comments on how the Council has calculated its office need forecasts? Please explain your answer.

Question 12

Do you have any comments on the office floor space requirements used for testing in this consultation? Please explain your answer.

Question 13

Do you think that we have missed any issues related to future employment and economic development to be addressed in the new Local Plan? If yes, please explain why.

Question 14

Do you think that we have missed any issues related to highways, transportation and accessibility to be addressed in the new Local Plan? If yes, please explain why.

Question 15

Do you think that we have missed any issues related to protecting the environment to be addressed in the new Local Plan? If yes, please explain why.

Question 16

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

Settlement Hierarchy

Following the top level of city and town by a group of other larger settlements which provide a range of key services such as primary schools, healthcare, public houses, local shopping and community facilities. We are calling these Key Service Settlements

Key Service Settlements: Bicknacre, Boreham, Broomfield, Danbury, Galleywood, Great Leighs, Runwell, Stock, Writtle

Question 17

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

Question 18

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

Question 19

Do you support the proposed Spatial Principles?

Maximise the use of brownfield land for development

Continue the renewal of Chelmsford's City Centre and Urban Area Protect the Green Belt Locate development at well-connected sustainable locations

Protect the river valleys by defining Green Wedges

Respect the character of the existing settlement pattern including the potential designation of Green Buffers Protect the character and value of important landscapes, heritage and biodiversity

Ensure new development is deliverable and can be built within the Plan period Ensure that new development is served by necessary infrastructure.

If no, please explain your answer.

Question 20 How do you think that new development growth in Chelmsford should be provided in the new Local Plan?

- 1. Urban Focus: Chelmsford, South Woodham Ferrers and Great Leighs
- 2. Urban Focus & Transport Corridor Growth: scaling back of 1 compensated by more along A130/131 and A132 corridors.
- 3. Urban Focus & Key Village Growth: scaled back 1 plus more in Danbury, Boreham, Bicknacre and Howe Green
- 4. None of these

Question 22 Which location(s) do you support for new development growth in the new Local Plan? Location 1 – Chelmsford Urban Area

Location 2 - West Chelmsford

Location 3 – North Chelmsford (Broomfield)

Location 4 - North East Chelmsford

Location 5 - East Chelmsford (East of Great Baddow)

Location 6 - North South Woodham Ferrers

Location 7 - Great Leighs

Location 8 - Howe Green

Location 9 - Rettendon Place

Location 10 - Boreham

Location 11 - Danbury

Location 12 - Bicknacre

Location 13 – Ford End

Location 14 - Great Waltham

Location 15 - Little Waltham

Location 16 - East Hanningfield

Location 17 - Woodham Ferrers

Please provide comments and references to any evidence to support your response.

Question 23 Are there any alternative or additional locations for new development growth that should be considered in the new Local Plan? Where possible, please support your answer with reference to any evidence.

Question 24 Do you have any comments on the following road and transportation improvements as shown on the Spatial Options plans?

Potential Western Relief Road

Highway capacity improvements to the A132

The Issues and Options Consultation document – the Society's response

Danbury Society is a civic society which at the end of 2015 had a paid-up membership of nearly 900 comprising over one-third of the 2,500 households in the village. It maintains contact with its members by talks, newsletters, blog and website.

The Society has already provided its observations on the Sustainability Appraisal, Non-technical summary. It now submits its views on the Issues and Options Consultation.

The question structure of the consultation document is not the best basis for responses from a body like Danbury Society whose interests are more narrowly focused than across the whole of the local authority area. Nevertheless the Society has involved itself in planning and development matters affecting the village since its formation in 1967 so is familiar with the processes involved.

The Society recognises that the development challenges that the City must address are driven by outside directives from central government that may not reflect the wishes or aspirations of Chelmsford residents. Making choices can therefore set of one part of the community from another. In particular, *Question 22 Which location(s) do you support for new development growth in the new Local Plan?* could cause resentment.

In its submission the Society will attempt to be objective in its views on the proposals. It considers the consultation document to be quite comprehensive (Q1) but the Vision is clichéd and unoriginal. (Q2) It is also off beam as some of the points are not within the City's gift. Road infrastructure in particular is a responsibility of the County Council or Highways Agency. (Q3)

The calculation of housing need has been calculated by outside bodies so the matter of objectivity cannot be assessed. (Q4) The Housing Market Area, a concept that provides the basis for subsequent assessments, was imposed from outside. The demographic projections are those of central government. They require 657 homes/year. The adjusted uplift of 118 more homes than that figure is not explained and, even more drastically, linking spatial options with 'a higher quantum of development' by an arbitrary figure of 20% is strange. Why not 15% of 25%? Nothing is explained. But that figure yields 990 homes/year more than half as much again as the original starting point. (Q5) In the military there is the term 'mission creep'; this is a technique that seems to be applied to Chelmsford's housing planning.

The Society has no comment on Travellers' sites. (Q6)

The estimates of new jobs appear to have been generated by external consultants and not by the City Council. While it relates to the statement in par 5.13, there is no statement that links numbers of jobs with required housing. (Q7) It all seems to be a quite arbitrary process: par 5.25 estimates 727 jobs/year while par 5.26 puts the number at 887 jobs/year. (Q8)

The retail assessment is considered to be overly optimistic. All recent evidence suggests that supermarkets are abandoning their plans for large stores. The impact of on-line sales is being felt quite markedly by fashion retailers such as Marks & Spencer and Next. (Q9) There must also be uncertainty about the meaning of the estimated floor space as there seems to be no consideration of the car parking and goods handling space required in modern retailing. (Q10)

The Society has no comment on the calculation used by the City Council to estimate office needs as there is no calculation given. (Q11) There is no evidence that any consideration has been given to the clear trend for remote working from home and using on-line facilities. Has the expansion of serviced offices been considered as provided by such firms as Regus? (Q12) As for other needs, the Society is surprised that the City Council makes no estimate of the land take that will be required for all the employment development that is proposed. (Q13)

The transport issues are of great importance to Chelmsford and Danbury Society has been exercised for many years about one specific aspect: A414 running through the heart of the village. Although the consultancy document represents an early stage, the Society thinks the City Council should emphasise that the central government funds already allocated for the strategic network (A12 and London-Norwich railway) will lose their effectiveness if users are delayed by congested access roads to them. (Q14) Obviously Danbury Society has in mind the serious situation of the A414 linking Maldon and the Dengie with the A12 and Chelmsford.

It seems that the consultancy documents may not have entirely originated from the City Council as in the table 'Strategic Global Focuses' the last bullet point in the Central listing suggest, "working with Chelmsford City Council to develop a Parking Strategy."

The Society is encouraged by the attention given to the environmental issues and is gratified by the strong assurance of the inviolability of the Green Belt. What is confusing is the listing of the different kinds of conservation designations without any indication of the relative protection that the City Council would give each type. (Q15)

The other infrastructure issues appear to be fully identified in the consultancy document. (Q16) What may be additional issues are where boundaries change, agencies are disbanded or new organisations created.

The Society agrees that the settlement hierarchy of (i) City or Town, (ii) Key Service Settlement, (iii) Service Settlement and (iv) Small Settlement is logical. (Q17) It also agrees that by the definitions given, Danbury should be classified as a Key Service Settlement. (Q18)

The outline of the Spatial Principles is fine. The Society's responses to the proposals for Danbury are strongly influenced by one of the Principles set out in the list: "Locate development at well-connected sustainable locations." (Q19)

Of the options listed the Society accepts the final choice should be among the three described not an undefined 'other'. Any dramatic alternative could be expensive and end in tears. (Look at Maldon Council) (Qs20 & 21) Of the three, the Society prefers option 2. 'Urban Focus & Transport Corridor Growth' that scales back the centrality of option 1 development and compensates by more along A130/131 and A132 corridors. As the Council states in par 6.24, "These key locations have been chosen as they are well connected to the existing highway network, are outside the Green Belt, are deliverable and provide opportunities to help fund, through developer contributions, road improvements in this corridor."

As second choice the Society would accept option 1. 'Urban Focus' with development only in Chelmsford, South Woodham Ferrers and Great Leighs as the preference.

The Society rejects option 3. 'Urban Focus & Key Village Growth' with development distributed in a dozen small places around the district.

It believes strongly that the character of the Chelmsford area will be best served by concentrating development on existing urban centres is described in options 1 and 2. In fact the only locations the Society would support unambiguously (Q22) are options 1-4: Chelmsford Urban Area, West Chelmsford, North Chelmsford (Broomfield) and North-East Chelmsford.

The Society does not speak for Boreham or Howe Green and only indirectly for Bicknacre but in the case of Danbury the suggested development runs counter to many of the principles set out in the consultancy document and other evidential documents. For example, the second listed objective (par 5.47) for the consultancy document's 'Issue – Getting Around' is "Improve accessibility and connectivity into and within Chelmsford". By building more houses in Danbury, the already challenging traffic situation on the A414 will be exacerbated. The Council already acknowledges this (par 6.29): "For example, the A414 to the east of Chelmsford has serious traffic capacity issues which will severely limit opportunities in locations such as Danbury and Bicknacre."

In addition the land proposed – which was subject to a rejected application by Berkeley Homes to create Danbury East Community Village in the early 2000s – is within an Essex Wildlife Trust (EWT) 'Living Landscape'. It is actually no 42 on the EWT list, 'Danbury Ridge.' The City Council acknowledges this – (6.29 *idem*) – "These locations are also constrained by significant nature conservation designations..."

Note also that in the Landscape Character Assessment produced as part of the Local Plan Evidence Base, it states (2.2.20), "Danbury Common SSSI is one of the largest areas of heathland remaining in Essex and shows various stages in the succession from open heath, through bracken and gorse scrub, to birch and oak woodland...Unimproved meadows adjacent to the Common support a rich grassland flora including a number of uncommon species." The suggested site forms part of those 'unimproved meadows'. The same document also states (5.5 F5 Sensitivities to change) "Overall, this character area has relatively high sensitivity to change." In the next section (Suggested Land Management Guidelines) "Conserve and restore pastures; Conserve and manage the existing hedgerow pattern, and strengthen where appropriate through planting; Conserve the predominantly rural character of the area."

The Site Allocations document – also presented as part of the Local Plan Evidence Base – describes the Site Allocations Development Plan Document (SADPD). This includes definitions of the Defined Settlement Boundaries (DSBs) that "provide a framework for clear and consistent decision making by providing clear site allocations." In Part 3, Topic 2 Danbury is described of which the relevant section (3.17) states, *inter alia*, "Around the The Ridge and the adjoining area development has undermined the wooded character resulting in gradual urbanisation. Accordingly, the area is excluded from the DSB to prevent any further extension of the built-up area."

The Society offers no views on the other aspects of the consultancy document (Qs23-29) but notes that in the consultancy document there is no mention of the actual land take arising from the potential residential, industrial or retail developments. Indeed there is only one land area given: the total area of Chelmsford at 28,000 hectares. (Q30)

The Society is ready to provide further views and observations if required.