

This response is submitted by The Danbury Society.

Please accept this response to the current Local Plan review "consultation"

The Danbury Society strongly objects to the development of Hammonds farm as the preferred option (16a: East Chelmsford Garden Community (Hammonds Farm) and 16b: Land adjacent to A12 Junction 18 (Employment Site))

In March 2017, when Chelmsford City Council issued its outline Spatial Strategy for 2012-36, it described a concept that saw major development to the northeast of the city and in the city itself with small developments in selected villages of which Danbury was identified as an area for around 100 houses.

It was acknowledged by the City Council that Danbury would be an extremely challenging task. Given the significant constraints

It was said:-

"Although future development in Danbury is restricted by significant landscape, ecology and highway constraints, there is some limited capacity in the primary schools that serve Danbury."

In the document it also mentioned the Alternative Spatial Strategy of Urban Focus with Growth at Hammonds Farm and Key Service Settlements outside the Green Belt. This differed from the preferred Spatial Strategy by substituting North East Chelmsford (Location 4) with a new settlement known as 'Hammonds Farm'. This was Option E and ranked 5th in the Issues and Options Consultation 2022 and was dismissed by the City Council (more precisely 'discounted') as it was not supported by the Plan evidence base including the Landscape Sensitivity and Capacity Assessment and Preferred Options.

Danbury, Sandon and Little Baddow have invested vast amounts of time in preparing Neighbourhood Plans to support that Spatial Strategy. There were constant reminders that our plan had to be based upon firm evidence and all sites assessed on that basis.

These were all thoroughly assessed and had to follow the Local plan adopted in 2020. Danbury was told that sites to the west of the settlement could not be considered as they do not adjoin the Defined Settlement Boundary. Nevertheless and in the meantime a solar farm has been installed.

Were Hammonds Farm to be included as the preferred option then the aspiration of both Chelmsford and Danbury to maintain separation between settlements would all but disappear. This would therefore be contrary to Spatial Principle e)¹

¹ Revised Spatial Principle e) Focus development at the higher order settlements outside the Green Belt and respect the development hierarchy of other settlements

Chelmsford City Council have conducted a review of the Local Plan and commissioned an Integrated Impact Assessment from WSP. The report runs to hundreds of pages.

As part of the Local Plan review 5 Spatial options were presented for comment. Evaluation of the Issues and Options Local Plan consultation responses for some reason led the Council to develop and test a new hybrid spatial option based on the three growth areas of Central and Urban Chelmsford, North Chelmsford and South and East Chelmsford.

Having consulted on 5 options one could be forgiven for some head scratching when the Council decided to change the spatial strategy to encompass 3 growth Areas. The preferred Spatial Strategy will focus growth in three broad growth areas - Central and Urban Chelmsford, North Chelmsford and South and East Chelmsford.

Consequently the consultation has been rendered largely redundant since the new spatial options have not yet formed part of the consultation and have been altered, presumably to fulfil the aspirations of others by placing the declared balance of housing required up to 2041 (3862 dwellings) at a new "Garden Village" at Hammonds Farm.

Under the section related to difficulties encountered in undertaking the assessment, those uncertainties and assumptions are listed.

- The design and layout of the proposed allocations is not known at this stage.
- The extent to which job creation is locally significant will depend on the type of jobs created (in the context of the local labour market) and the recruitment policies of prospective employers.
- The level of investment in Community facilities and services that may be stimulated by new development is uncertain at this stage and will in part be dependent upon the policies of the Local Plan, site specific policies and viability.
- The exact scale of greenhouse gas emissions associated with Local Plan approaches will be dependent on a number of factors including: the exact design of new development; future travel patterns and trends; technological changes; individual energy consumption behaviour; and the extent to which energy supply has been decarbonised over the plan period.
- The exact scale of waste generated will be dependent on a number of factors including: the design of new development; waste collection and disposal regimes; and individual behaviour with regard to recycling and reuse.
- The speed, scale and behavioural implications (such as patterns of work and commuting) associated with the recovery from the Covid-19 pandemic.

ASSUMPTIONS

- It is assumed that greenfield land will be required to accommodate some of the future growth over the plan period
- It is assumed that new development would not be located on land designated for nature conservation.
- It is assumed that the Council will liaise with Essex and Suffolk Water with regard to infrastructure requirements for future development.
- Measures contained in the Essex and Suffolk Water's Water Resources Management Plan would be expected to help ensure that future water resource demands are met.
- There will be no development that will require diversion or modification of existing watercourses. However, if such measures are required, this could affect local water quality.
- It is assumed that, where appropriate, development proposals would be accompanied by a Flood Risk Assessment (FRA) and that suitable flood alleviation measures would be incorporated into the design of new development where necessary to minimise flood risk.
- It is assumed that the Essex Waste Local Plan will make provision to accommodate additional waste associated with growth in the Chelmsford City Area.

It is difficult to understand how, with so many uncertainties and unknowns that a decision to include a previously unsustainable site as a primary and preferred location for future development has been arrived at?

From the Integrated Impact assessment it is clear that potential mitigation and enhancement measures are at present unknown.

1. HIGHWAYS

National Highways have no plans to mitigate the problems that will inevitably occur not only on the A12 between J 18 and J 19 but on the already overloaded A414 through Danbury , Little Baddow, Sandon and Bicknacre. Furthermore there is no current modelling that indicates that the Boreham Interchange will be able to cope with the more cars on Main Road Boreham, more cars accessing the Boreham Rail Station, more cars circling Chelmsford using the new planned road when they need to avoid congestion on the A12 and more cars and commercial vehicle traffic arriving from growing settlements in Maldon and beyond.

As part of Danburys Neighbourhood plan residents primary concern was the exponential growth of traffic movements through the village.

The biggest issue for Danbury, identified by Residents Questionnaire, 2017 (Supporting Document 7) was heavy traffic along the A414 which bisects the village separating the North and South areas. Significant housing and economic growth at both Maldon and Chelmsford have increased traffic and HGV volumes along the A414. The resulting traffic flows through Danbury cause long tail backs with pinch points at Well Lane and Eves Corner. Consequently, rat running along the local lanes is a further concern for residents.

The impact of planned growth in Maldon was studied through the Duty to Cooperate between Chelmsford City and Maldon District Councils. The need for additional mitigation was agreed in an A414 Danbury Statement between Essex Highways and Chelmsford City Council.

Two schemes were recommended to improve traffic flow, only one (part time traffic lights at Eves Corner) was implemented. However, the Position Statement between Chelmsford CC, Essex CC and Maldon DC concluded that "The development of pre-signals at Eves Corner would reduce current levels of congestion, however following proposed growth allocated in the (Maldon) LDP, queuing along the A414 during peak periods would be significantly worse".

The proposal to introduce "mitigation" to try to reduce east and west congestion on the A414 is nothing more than fanciful, indeed, Chelmsford reported evidence which accepts that this congestion will drive more rat-running through Danbury, Little Baddow and Sandon. These rat runs are narrow lanes, even single track ones with multiple blind corners and restricted speeds so that rat-running is especially dangerous.

The Danbury Neighbourhood plan was partly driven by the community's desire to retain the rural character of the settlement by avoiding detriment to the country lanes that are such an important feature of the village and surrounding areas. This proposal would certainly compromise if not undo all of those efforts.

2. FLOODING ISSUES :

In considering the objectives the IIA report found that the key likely significant sustainability effects associated with the spatial approaches includes Objective 9 Flood risk; To reduce the risk of flooding to people property taking into account the effects of Climate Change.

The Chelmer Valley and Hammonds Farm have notorious flood problems. These will be exacerbated under Climate Change conditions. The existing Church Road Boreham regularly floods now. The proposed new road will displace flooding to make that worse.

Water runoff from housing and associated infrastructure is a major issue.

There is no evidence to demonstrate that this risk including any cumulative effects have been properly reviewed and assessed and this clearly is contrary to Spatial principle g)².

3. BEST AND MOST VALUABLE AGRICULTURAL LAND:

The Hammonds farm proposal requires the loss of agricultural land which once developed for housing will be lost forever.

There does not appear to have been any detailed assessment of the actual soil types and grades and it appears that the general classification provided by Natural England has been used. This is designed to give an indication of land quality at a strategic level and consequently it is not suitable for site specific assessment.

4. LANDSCAPE:

How Spatial Principle f)³ will be achieved is impossible to envisage. As already mentioned the reason for discounting this site was in part due to Landscape impacts. The landscape has not changed so how does the destruction of the landscape not now matter?

Hammonds is in an incredibly rural area Northwards is the Chelmer Valley. Eastwards there is only one residential building before one reaches New Lodge Chase and Hurrells Lane, a mile away. In that area is Waterhall Meadow, an ancient unimproved flood meadow on the west bank of Sandon Brook, with a small spinney, a pond and an area of blackthorn thickets. This is in sharp contrast with the west side of the A12, where housing density and the eastern fringes of Chelmsford itself lie.

The proposal to develop this into a semi-urban residential area and to construct a new arterial road through it will completely destroy the Landscape character.

Recent applications for the whole of this area to be designated as an AONB have been completely overlooked. To proceed, knowing that if designation had already existed the City Council would certainly had to have chosen an alternative preferred option, would be irresponsible at best.

There has been no detailed assessment of the potential impacts of footfall on the numerous SSSI's and Wildlife trust reserves nearby.

The construction of modern buildings and infrastructure would detract from the rural charm and historic character that make the villages and their surroundings so special.

5. WILDLIFE AND BIODIVERSITY:

² Revised Spatial Principle g) Locate development to avoid or manage flood risk and reduce carbon emissions

³ Revised Spatial Principle f) Respect the character and appearance of landscapes and the built environment and preserve or enhance the historic environment and biodiversity.

Hammonds Farm is the beginning of "Baker" Country. Essex Wildlife Trust has been working for a number of years in the Parishes of Danbury and Little Baddow to create wildlife corridors essential in enabling wildlife to move freely through the landscape and to protect and enhance habitats and restrict extinctions.

Increased human activity and infrastructure would increase pollution and predations by domestic pets (It is estimated that cats kill 27 million birds in Britain every spring and summer⁴)

6. LACK OF INFRASTRUCTURE:

Existing infrastructure is already financed and included in the development of housing in the North East and contained within that plan, provision will have been made for schools and medical facilities in that area.

The "planned" infrastructure for development at Hammonds Farm is, at present no more than an idea. As commented on by another developer "Any new settlement will take many years to reach any sort of critical mass whereby meaningful infrastructure contributions can be made and be potentially well beyond the plan period".

At Hammonds, Chelmsford would have to start from zero rather than incrementally increase capacity in facilities already built or under development. Consequently Hammonds Farm is neither well connected or sustainable as required by Spatial principle a)⁵

In North East Chelmsford the existing infrastructure would enable the additional dwellings required to be incorporated into the plan without these problems.⁶

It is clear that the point (5.5.66) raised in the IIA stating that "a new large settlement is generally opposed for a wide number of reasons including landscape, environment, loss of agricultural land, impact on services and roads, lack of flexibility, potential delays in delivery with only limited support shown for a "sensitive" approach, indicates that the Council is not listening to the people they are supposed to represent.

CONCLUSION

In conclusion the proposal to choose Hammonds farm as the preferred option is based upon minimal evidence and is both ill-conceived and unsustainable on all of the points outlined above. It fails to meet the test of necessity since there are other more suitable and sustainable sites available in the City's area that should first be developed for housing and employment.

⁴ <https://www.express.co.uk/news/uk/1895946/cats-wear-bells-declining-bird-population>

⁵ Revised Spatial Principle a) Locate development at well-connected and sustainable locations.

⁶ Revised Spatial Objective i) Locate development to utilise existing and planned infrastructure effectively.