

**Chelmsford City Council Local Plan**

**Statement of Case of the North and West Parishes Group, which comprises: Broomfield Parish Council, Chignal Parish Council, Little Waltham Parish Council and Writtle Parish Council**

**Part 3: Matter 9 (Week 3)**

**November 2018**



## **Chelmsford Local Plan and Sustainability Appraisal**

### **Statement of Case of the North and West Parishes Group**

1. This Statement is submitted on behalf of North and West Parishes Group (“The Group”) in relation to the Chelmsford City Local Plan. The Group submitted representations under Regulation 19 at the appropriate time and set out their concerns in relation to the Plan in terms of the overall strategy and specific matters. It is our case that these representations still stand.
2. This document follows the Statements made in relation to Week 1 and Week 2 of the Examination. We have also made a separate statement in relation to Matter 8, prepared by TTHC Transport Consultants. This Statement is made in the same context, namely the concerns of these Parishes about the proposed strategic sites in or near to their Parishes around the north and west of Chelmsford.
3. This Statement sets out the key matters of concern of The Group in relation to this Plan and its preparation, in the context of the Matters being considered at the Examination.
4. The Group is in agreement that they have been consulted by Chelmsford City Council at every stage of consultation, but they retain concerns that the responses to consultation have not been adequately reflected at each stage of the Plan preparation.
5. The Parishes Group also fundamentally has concerns as to the process which has led to the preferred option for the future growth of the Chelmsford Area.
6. In the preparation of this Statement of Case, The Group has sought to limit repetition from previously provided representations and, as such, the comments made in these submissions still stand.
7. Some of the Parishes have also independently worked on Statements of Common Ground with Chelmsford City Council, which (where agreed) are provided as separate documents to the Examination.

### Week 3

#### Matter 9: The Environment

**Does the Plan set out a positively prepared strategy for conserving and where appropriate enhancing the natural, built and historic environment that is justified, effective and consistent with national policy?**

8. The City area is heavily constrained by the extent of the Green Belt in the south west, which covers almost 34% of the area. The Spatial Strategy further limits a more even distribution of development across the remaining City area, since Growth Area 3 is mainly limited to SGS7 (North of South Woodham Ferrers). This means that (with the exception of SGS7) all significant growth is located north of the A12.
9. The best and most versatile agricultural land lies to the north and west of the City. This is predominantly Grade 2 land, in contrast to the land south of the City which is Grade 3 or 4.
10. Even without a review of Green Belt boundaries, the Group considers that a spatial option could have been developed based on a higher degree of growth to the south and east of Chelmsford. This would have been both more sustainable (given the high-quality infrastructure of the A130 south) and more sparing of high-quality Grade 2 agricultural land north and west of the City. The Group has made these points in representations at every stage, particularly at Issues and Options.
11. The Group therefore considers that the Plan does not constitute a positive strategy for protecting valued landscapes and soils, as required by the NPPF at paragraph 109. Consequently, it is not justified, effective or consistent with national policy in this regard.

#### Q85

**a) Are these valued landscapes in the context of paragraph 109 of the Framework and if so, is this based on robust evidence and are they clearly justified?**

13. 'Valued landscapes' should be identified by comparative landscape and ecological studies (as suggested above) and by consultation with adjacent communities. It is unclear to what extent there has been such consultation with communities such as parishes or neighbourhoods. Both consultation and professional evidence is ideally gathered at a very local level which could be achieved through the Neighbourhood Plan process where they are being prepared.
14. Paragraph 6.79 makes reference to 'evidence which could include that being prepared to support a Neighbourhood Plan'. The role of Neighbourhood Plans in identifying valued landscapes should receive much more emphasis and be included within the text of the Strategic Policy 13 itself.

**b) How have green wedges and green corridors and their respective boundaries been determined? Are their designations supported by appropriate methodologies and criteria?**

15. The Group welcomes attempts to conserve and enhance the natural environment, as required by the NPPF, chapter 11. However, it has concerns with the approach set out in Strategic

Policy 13, which does not seem to constitute a holistic approach to the role and value of the countryside. In particular:

- It is unclear to what extent the wider Rural Area has been studied, compared to the landscape studies of the river valleys and the specific parcels of land being considered for development. The Plan recognises that the 'role and function of land in Chelmsford beyond the built-up areas is wide-ranging...' (para 6.76). It is likely therefore that valuable, justified designations could have been made outside the river valleys subject to sufficiently detailed study, for example; in rural areas that form a biodiversity corridor between settlements but are not in a river valley.
- The extent to which the policy designation creates an artificial separation of adjoining parcels of land that are in fact more interconnected. The Group drew attention, at Issues and Options stage, to the danger of surface water run-off at SGS2 (which is just outside the Green Wedge) exacerbating the existing problem of flooding of the Wid (which is inside the wedge). A more holistic approach to specific local issues such as flooding would better justify these designations.
- The green wedges are largely defined by the floodplains, which benefit from their own protection. The Green Wedges could also have been considered for use in other areas of landscape sensitivity.
- Given the automatic protection given to Green Belt (34% of the City area) regardless of its specific landscape value, it could be argued that further protection needs to be highly targeted at specific landscapes, rather than simply being applied to a whole category of landscape features (i.e. river valleys).

**c) Have the purposes of green wedges and green corridors been clearly defined within the Plan and does land within their boundaries meet the required purposes?**

16. One of the purposes of Green Wedges and Corridors is their amenity, leisure and recreational use. There is evidence of this purpose not being fulfilled, for instance some sections of the Chelmer River Valley in Broomfield, where there has been no increase in public access or recreational use since designation. The purposes therefore not only need to be defined but also mechanisms put in place for their implementation to ensure that this policy is sound.
17. **In conclusion**, this aspect of Strategic Policy 13 (green wedges and corridor) needs further development and application in a more holistic way to be fully compliant with the NPPF, paragraph 109.