

Strategic Housing and Employment Land Availability Assessment (SHELAA) Criteria Note and Methodology Consultation – Feedback Report

The SHELAA Methodology and Criteria Note Consultation received eight representations from eight different consultees. These responses have been collated with those received on the Issues and Options Consultation – which also sought views on the SHELAA Methodology and Criteria Note.

The table below details a summary of the comments received. Where comments have been provided on former iterations of the SHELAA or on matters not related to the SHELAA, these comments have not been summarised here with an explanation provided in red text. Copies of all comments are available to view in full at:

<https://consult.chelmsford.gov.uk/kse/event/37276/peoplesubmissions/>

<https://consult.chelmsford.gov.uk/kse/event/36999/peoplesubmissions/section/>

<https://consult.chelmsford.gov.uk/kse/event/37000/peoplesubmissions/>

Rep ID	Consultee	Agent	Officer Summary	Proposed Action
SHELAA-Method&Criteria1	Sandon Parish Council (Cllr Dee Hyatt)	-	More should be made of brownfield sites as opposed to developing on farmland	None - sites that are deemed previously developed land are favoured in the SHELAA Criteria Note.
SHELAA-Method&Criteria2	Little Waltham Parish Council (Ms Suzanne Walker)	-	Feasibility and impact of roads and other infrastructure should be considered together with the impact upon existing communities	None - not appropriate to undertake at the SHELAA stage as there are too many unknown variables.
SHELAA-Method&Criteria4	Mr David Marsh	-	(Comments are not relevant to the SHELAA Criteria Note or Methodology documents)	None.

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SHELAA-Method&Criteria5	Place Services Historic Environment Team (Mr Mark Baister)	-	Feel 'Essex Historic Records Office' should be included as source of data re Non-Designated Heritage Assets & Archaeology Spelling mistake on para 5.7 to be amended	Amend spelling mistake on para 5.7. The appropriate Essex County Council department is consulted to give a view on historic/archaeological assets at Preferred Options stage therefore no action.
SHELAA-Method&Criteria6	Danbury Parish Council (Mrs Lesley Mitchelmore)	-	Support for criteria seeking protection of natural features and heritage assets	Support noted.
SHELAA-Method&Criteria7	Anglian Water Services Ltd (Ms Tessa Saunders)	-	Support approach, welcome assessment of utilities on site. Suggest expansion to assess sewerage assets to ensure these are not in back gardens or built on. Sewage works and pumping stations should have a radius to ensure development is not in inappropriate range (not within 15m of a sewage pumping station due to smell/adverse effects). Renewable Power Generation suitability criteria should be more favourable as no receptors regarding odour are considered for this type of development - therefore potentially less constraints.	Will amend to incorporate checks on the proximity to sewage pumping stations. Regarding the renewable power generation suitability criteria, this criteria will be reviewed in future SHELAA assessments when further knowledge of the range of types of sites promoted for these uses is gained.
SHELAA-Method&Criteria8	Galleywood Parish Council (Mrs Kelly Wilde)	-	Documents are noted	None.

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SHELAA-Method&Criteria9	Hill Residential Ltd (Anthony Pharoah)	Boyer Planning (Mark Edgerley)	Disagree with capped constraints that are 'contrary to national policy' as is unfair against Green Belt sites that are otherwise suitable - argue that NPPF allows in certain circumstances. Suggest use of policy off approach instead. Criteria surrounding proximity to employment sites too restrictive as only considers employment to be that on existing/proposed employment allocations. Fails to acknowledge WFH lifestyles	None - National Planning Practice Guidance states that plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites. Whilst the key purpose is to identify sites and their constraints, this does not mean that they are completely ruled out. Also, the assessment does not in itself determine whether a site should be allocated for development. A comparison of sites based upon performance against specific criteria is already possible through the provision of individual scores against each criterion. To make this easier, we will add in a total score field to the site output report.
I&OQ22-2	Rosehart Properties (Geoff Spiller)	Andrew Martin - Planning Limited (Andrew Martin)	Support SHELAA Criteria Note & Methodology	Support noted.
I&O22-93	Mrs David & Lesley Arnold	-	(Comments are not relevant to the SHELAA Criteria Note or Methodology documents)	None.
I&O22-102	Stephen Hall	-	Support SHELAA Criteria Note & Methodology	Support noted.
I&O22-159	Mr. Stephen Baddeley Arthurs	-	(Comments are not relevant to the SHELAA Criteria Note or Methodology documents)	None.

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I&O22-179	Mr Paul Roberts	-	Impact upon neighbouring communities (eg. Maldon) and climate change are not considered within the criteria	None – impact on neighbouring communities would be considered later as part of the DTC or planning application process. Consideration towards sustainability (which includes factors relating to climate change) are incorporated throughout the Sustainability Appraisal that supports the Local Plan. This Sustainability Appraisal has informed the drafting of the Criteria Note with relevant criterion aligning with the Appraisal’s Sustainability Objectives – see references throughout Criteria Note.
I&O22-202	Mrs April Chapman	-	(Comments are not relevant to the SHELAA Criteria Note or Methodology documents)	None.
I&OQ22-34	Mr and Mrs Andrew Parker	-	Support SHELAA Criteria Note & Methodology	Support noted.
I&O22-257	Dr Sue Baker	-	Support SHELAA Criteria Note & Methodology	Support noted.
I&O22-291	Simon Morden	-	(Comments are not relevant to the SHELAA Criteria Note or Methodology documents)	None.
I&O22-320	Mr Francis Hunter	-	Support SHELAA Criteria Note & Methodology	Support noted.
I&OQ22-53	Mr Oliver Taylor	-	Support SHELAA Criteria Note & Methodology	Support noted.
I&OQ22-54	South Woodham Ferrers Town Council (Mrs Karen Atkins)	-	Believe restrictions should be implemented to prevent sites already in the proposed spatial strategy from being promoted to save the council time and effort in assessing these	None - processes are already in place (and set out in the Methodology) to ensure duplicate sites and land that has commenced/completed development are omitted from the assessment.
I&OQ22-56	Mr Adam Sewell-Jones	-	Support SHELAA Criteria Note & Methodology	Support noted.
I&O22-397	Mr Paul Grundy	-	Support SHELAA Criteria Note & Methodology	Support noted.
I&OQ22-76	Mr Alex Davis	-	Support SHELAA Criteria Note & Methodology	Support noted.

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I&O22-409	Essex County Council (Mr Kevin Fraser)	-	<p>Vehicle Access criteria - amend to read 'of a safe access route'</p> <p>Proximity to key services criteria - amend school distances to align with Essex Deign Guide (600m from primary, 1500m from secondary)</p> <p>Renewable power generation: "ECC would seek to make more detailed comments regarding specific Suitability Criteria"</p> <p>Minerals criteria - land surrounding promoted site to also be considered in mineral criteria; consideration towards mineral viability/provision of prior extraction/MRA at SHELAA stage; drafting suggestions on criteria (comments on these as per meeting notes from CCC/ECC Minerals catch up)</p> <p>Impact on community facilities criteria - suggest in line with ECC Developers Guide that development yield of 20 or more (rather than 10) be used</p>	<p>Re: Vehicle Access - no action as it is not possible at SHELAA stage to certify whether access routes would be safe/unsafe.</p> <p>Re: Proximity to key services - no action as current distances align with adopted Sustainability Appraisal for the Local Plan.</p> <p>Re: Renewable Power Generation - no action as no further comments have been provided.</p> <p>Re: Minerals - actions have been agreed with Essex County Council. Amend drafting of the criteria to align better with the Minerals Local Plan and Waste Local Plan, and removal of Minerals and Waste as a capped criteria.</p> <p>Re: Impact on community facilities - will amend to a yield of 20 or more to align with ECC Developers Guide.</p>
I&O22-437	Newland Spring Residents Association (Mr P Grundy)	-	Support SHELAA Criteria Note & Methodology	Support noted.
I&OQ22-67	Martin Grant Homes	Pegasus Group (Greg Shaw)	Scoring is overly complex; disagree with capped condition on minerals criterion; disagree with capped constraint on GB designation - suggest a GB review; disagree with ground constraints score where remediation work is needed; lack of evidence or reasoning behind scoring on neighbouring constraints.	It is important to understand where ground constraints and neighbouring constraints are present as these can impact upon the deliverability of a site. Explanation and reasoning behind these criteria are featured within the Criteria Note. The Green Belt is a national policy constraint and needs to be considered as such. The capping on Minerals and Waste is to be removed.

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I&O22-463	Mr William Brown	-	Support but feel it should be used as guide rather than rule	None - the Methodology clarifies that the purpose of the SHELAA is to provide a high-level profile of promoted sites and is considered alongside other evidence base documents to inform site allocations.
I&OQ22-95	Braintree District Council (Ms Julie O'Hara)	-	Support SHELAA Criteria Note & Methodology	Support noted.
I&OQ22-98	Ms Lois Bowser	-	Support SHELAA Criteria Note & Methodology	Support noted.
I&O22-513	Mrs Hazel Dale-Evans	-	(Comments are not relevant to the SHELAA Criteria Note or Methodology documents)	None.
I&O22-562	Heather Lawrence	-	Support SHELAA Criteria Note & Methodology	Support noted.
I&OQ22-85	Writtle Parish Council (Mrs Laretta Fox)	-	Support SHELAA Criteria Note & Methodology	Support noted.
I&OQ22-121	Mrs. Barbara Wright	-	(Comments are not relevant to the SHELAA Criteria Note or Methodology documents)	None.
I&OQ22-123	Mrs Paul Edwards	-	Support SHELAA Criteria Note & Methodology	Support noted.
I&OQ22-124	Gladman Developments Ltd (Mr Richard Agnew)	-	Support SHELAA Criteria Note & Methodology	Support noted.
I&OQ22-93	Pembridge Land Group (Jaimie Wragg)	Andrew Martin - Planning Limited (Andrew Martin)	Support SHELAA Criteria Note & Methodology	Support noted.

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I&O22-592	Robert Robarts & Susan Balls	Mark Jackson Planning (Mark Jackson)	Support SHELAA Criteria Note & Methodology	Support noted.
I&OQ22-126	Dominvs Group	Sphere25 (Mark Connell)	Suggest there exists gaps in the methodology but does not elaborate	None.
I&OQ22-116	Obsidian Strategic Asset Management Ltd	DHA Planning (Mark Bewsey)	Support generally, but suggest a policy off approach used so as not to rule out Green Wedge sites	None - National Planning Practice Guidance states that plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites. Whilst the key purpose is to identify sites and their constraints, this does not mean that they are completely ruled out. Also, the assessment does not in itself determine whether a site should be allocated for development. A comparison of sites based upon performance against specific criteria is already possible through the provision of individual scores against each criterion. To make this easier, we will add in a total score field to the site output report.
I&OQ22-252	Mr Stephen Hook	-	(Comments are not relevant to the SHELAA Criteria Note or Methodology documents)	None.
I&OQ22-171	Stonebond (Chelmsford) Ltd.	Pegasus Group (Olivia James)	(Comments relate to a previous iteration of the SHELAA - only points that are also relevant to the latest iteration have been summarised) Disagree with capped constraint on minerals designations and public transport	Capped constraints on minerals to be removed. No action to be taken in relation to the capping of the public transport criterion as this is considered justified in line with Local Plan policies and accompanying Sustainability Appraisal.

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I&OQ22-194	Bloor Homes (Eastern)	Pegasus Group (Olivia James)	(Comments relate to a previous iteration of the SHELAA - only points that are also relevant to the latest iteration have been summarised) Disagree with capped constraint on minerals designations and public transport	Capped constraints on minerals to be removed. No action to be taken in relation to the capping of the public transport criterion as this is considered justified in line with Local Plan policies and accompanying Sustainability Appraisal.
I&OQ22-77	Dr Linda Reed	-	(Comments are not relevant to the SHELAA Criteria Note or Methodology documents)	None.
I&OQ22-64	Taylor Wimpey	Fraser Halls Associates (David Phillips)	Reminding the Council that the SHELAA needs to be carried out in accordance with national planning guidance and established best practice	None.
I&OQ22-113	Great Waltham Parish Council (Mr William Adshead-Grant)	-	(Comments are not relevant to the SHELAA Criteria Note or Methodology documents)	None.
I&OQ22-214	Broomfield Parish Council (Mark Hembury)	-	(Comments are not relevant to the SHELAA Criteria Note or Methodology documents)	None.
I&OQ22-242	Grosvenor Property UK and Hammonds Estates LLP	Rachel Hough	Suggest greater nuance requires in natural features criteria as scores look to penalise for potential to negatively impact these features, but no consideration given to if site would positively impact these features	No action - not enough detail is provided by site promoters at the SHELAA stage to assess the quality of enhancement to natural features.

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I&OQ22-201	Bellway Strategic	Claremont Planning (Eleanor Lovett)	Suggest policy on & policy off approach is used. Criteria should be more realistic - disagree with flooding criterion as sites with small sections in these areas will be penalised	None - National Planning Practice Guidance states that plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites. Whilst the key purpose is to identify sites and their constraints, this does not mean that they are completely ruled out. Also, the assessment does not in itself determine whether a site should be allocated for development. A comparison of sites based upon performance against specific criteria is already possible through the provision of individual scores against each criterion. To make this easier, we will add in a total score field to the site output report.
I&OQ22-192	Mr J Bolingbroke	Savills (Laura Dudley-Smith)	Do not agree with inclusion of both 'physical' and 'policy' constraints as part of the capped constraints list - suggest the two to be distinguished	None - A comparison of sites based upon performance against specific criteria is already possible through the provision of individual scores against each criterion. To make this easier, we will add in a total score field to the site output report.
I&OQ22-186	Sempra Homes Ltd.	Savills (Laura Dudley-Smith)	Do not agree with inclusion of both 'physical' and 'policy' constraints as part of the capped constraints list - suggest the two to be distinguished	None - A comparison of sites based upon performance against specific criteria is already possible through the provision of individual scores against each criterion. To make this easier, we will add in a total score field to the site output report.
I&OQ22-176	Richborough Estates (Nick Banks)	Pinnacle Planning (Jenny Fryer)	(Comments are not relevant to the SHELAA Criteria Note or Methodology documents)	None.

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I&OQ22-240	Greystoke CB	Pegasus Group (Phillip Smith)	Suggests linking cycling/PROW scores with public transport. More clarity required to convey that SHELAA is merely evidence base doc	No action - the purpose of the SHELAA is conveyed through our Methodology, Criteria Note and on our webpage. Do not consider it appropriate to combine cycling/PROW with public transport.
I&OQ22-160	Miscoe Enterprises Ltd	Frazer Halls Associates (Rory Baker)	(Comments relate to a previous iteration of the SHELAA - only points that are also relevant to the latest iteration have been summarised) Disagree with capped constraint on green wedge	None - this is considered justified as it is in line with Local Plan policies and accompanying Sustainability Appraisal.
I&OQ22-161	Cliffords Group Ltd	Frazer Halls Associates (Rory Baker)	(Comments are not relevant to the SHELAA Criteria Note or Methodology documents)	None.

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