

Chelmsford Local Plan

Statement of Common Ground with Writtle Parish Council

1. Introduction

This Statement of Common Ground (SOCG) has been jointly prepared by Writtle Parish Council ('Parish Council') and Chelmsford City Council (CCC) in relation to the Local Plan. It considers areas of agreement between the parties and any areas of disagreement following the Parish Council's representations to the Chelmsford Pre-Submission Local Plan (Representation nos. PS1835 & PS1837). Representation no. PS1837 was a joint submission from the North and West Parishes Group which comprise of Broomfield Parish Council, Chignal Parish Council, Little Waltham Parish Council and Writtle Parish Council who were all invited by the City Council to enter into a SOCG individually with the City Council.

This SOCG concerns only the matters raised in the Regulation 19 representations (PS1835 & PS1837) relating specifically to the allocation at West Chelmsford (Strategic Growth Site 2).

The agreed matters in this SOCG do not preclude any further written or verbal representations that the City Council and the Parish Council may wish to make as part of the Local Plan Examination, in relation to any other matters which may not have been agreed and/or which do not form part of this SOCG.

2. Community Involvement and Local Plan Consultation

It is considered that the consultation on the Local Plan has been in accordance with the Council's Statement of Community Involvement (SCI) and appropriate bodies, including the Parish Council, have been notified at each stage of the plan making process. Representations made during formal consultation periods have been acknowledged, recorded on the City Council's consultation database and published. Feedback reports have been published at the end of each stage of formal consultation periods giving an overview of the consultation process, a summary of the main issues raised and information on how these have been taken into account. The information in the feedback reports is contained in the Regulation 22 Consultation Statement (SD 009) which is required for Submission of the Local Plan.

3. Site Allocations

Location 2 – West Chelmsford

Development of around 800 new homes and 5 serviced plots for Travelling Showpeople is proposed to land to the west of Chelmsford and north of Roxwell Road as identified in the Pre-Submission Local Plan under Location 2 and at Map 1 on the Pre-Submission Local Plan Policies Map which is attached at **Appendix 1**. The site is adjacent to the Chelmsford Urban Area but falls within the parish of Writtle. Writtle Parish Council objects to the principle of development and has specific concerns on the allocation's impact on the residents of Writtle and the identity of Writtle village.

The Parish Council's representations identify 10 main points of objection to Strategic Growth Site 2 which are further addressed in section 5.

4. Council's Schedule of Additional and Minor Changes

Notwithstanding the Parish Council's objections to the principle of development the parties agree that CCC have proposed changes related to the West Chelmsford site allocation as set out in the Schedule of Additional Changes (SD 002) and Schedule of Minor Changes (SD 003) to the Chelmsford Pre-Submission Local Plan including changes AC106 -108 and MC9-10 to the site allocation policy and reasoned justification. Amongst other matters, these changes include additional requirements of walking and cycling connections into and through the River Can and River Wid West Green Wedge; a safe multi-use crossing along Roxwell Road and financial contributions to mitigation measures as part of the Recreational disturbance Avoidance and Mitigation Strategy (RAMS).

5. Parish Council's objections and the City Council's response

The main points of objection the Parish Council have with the West Chelmsford allocation are:

Parish Council Position	City Council	Parish Council Response
<p>1. Traffic and transport evidence has been submitted to demonstrate that there is reason to believe that the allocation would result in higher traffic generation than assumed by the Essex Highways modelling. As such, it 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. This would have significant impact on the amenity of the local area.</p> <p>Earlier versions of the Local Plan included proposals for a significantly more extensive North West bypass to facilitate the development of this area of Chelmsford. Whilst it is noted that the extent of development in this area has been reduced since earlier consultation drafts of the Plan, the extent of the road infrastructure in this area has been reduced more significantly. The resulting proposals are uncertain in terms of their delivery and the timing of that delivery but have also been</p>	<p>The A1060/Lordship Road junction is not a mitigation priority as it is not expected to exceed capacity in 2036. Further details on this can be found in the Preferred Option Strategic & Local Junction Modelling (EB 026). Development at Strategic Growth Site 2 includes proposals to upgrade the A1060/Lordship Road junction and to deliver a new roundabout access into the development.</p> <p>The North West bypass was identified as a potential infrastructure requirement when a greater number of new homes (3,000) in West Chelmsford was identified as a spatial option at Issues and Options stage. The bypass has not been cancelled, instead the spatial options have evolved through the plan making process. The required infrastructure to support the West Chelmsford allocation is commensurate to the number of dwellings now proposed.</p>	<p>The proposed development at West Chelmsford will result in traffic and transport impact on the existing surrounding area.</p> <p>The traffic modelling by Essex County Council does not reflect the true potential of the increase in traffic in the area as a result of the proposed development.</p> <p>The upgrade of the A1060/ Lordship Road junction and provision of a new roundabout access to the development will not be sufficient to suitably mitigate the transport impact.</p> <p>The extent of the proposed road infrastructure is not adequate to mitigate the transport impact in this area and the timing of its delivery is uncertain.</p>

<p>reduced to an extent that they will not sufficiently mitigate the transport impact of the development of this area of Chelmsford and on the surrounding villages.</p>		
<p>2. There is a heavy reliance on the belief that an extensive modal shift will be achieved and that residents will use alternative means of transport to the car; walking, cycling, public transport. There is no evidence to justify the assumptions of the Traffic Modelling in this regard and as such, 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. There will be a significant traffic increase in this area as a result of the proposed development, which will not be adequately mitigated by 'encouraging' residents to use alternative modes of transport.</p> <p>3.</p> <p>4. The Plan proposes that the A1060 from the junction of Chignal Road and the city centre will include 'bus only' lanes to increase and improve bus services. This section of this road is too narrow to achieve this provision.</p>	<p>There are ongoing initiatives such as the Essex Cycling Action Plan and ECC's Chelmsford Future Transport Network which are aimed at encouraging sustainable travel through public transport and improved cycling connectivity. The developer will also be expected to address the need for sustainable transport accessibility to/from Strategic Growth Site 2 as part of the Transport Assessment for the development. This could involve discussions with Essex County Council and local bus companies to extend and/or introduce new services to the site.</p> <p>is no proposal at present for bus only lanes but the aforementioned initiatives are aimed at encouraging sustainable travel including via bus.</p>	<p>There is no certainty that the modal shift required to achieve the level of car use anticipated by this Plan will or can be achieved. Insufficient detail is provided as to the extent and timing of other modes of transport infrastructure needed to support this development and the lower reliance on car based movements.</p>
<p>5. The site is not connected to the cycle and walking path that runs along the River Can to Chelmsford. To achieve this, there would be a requirement to cross the busy A1060. This does not represent a suitable or feasible option neither does it represent encouragement of walking as an alternative to car use.</p> <p>6. It is noted that Amendment AC108 requires the improvement of connections through the River Can and the River Wid Green Wedge and the provision of a safe</p>	<p>Paragraph 7.119 of the draft Local Plan as amended by AC108 in the Schedule of Additional changes requires the development to improve connections for walking and cycling into and through the River Can and River Wid Green Wedge. It also has a requirement for the provision of a safe multi-use crossing along Roxwell Road.</p>	<p>Insufficient detail is provided in relation to the pedestrian links required to facilitate the extent of improved pedestrian access anticipated in this area to facilitate a more accessible development, which will be less reliant on car usage.</p>

<p>multi-use crossing along Roxwell Road, but this is not specific enough or sufficient to achieve a safe and useable alternative route, with any certainty in terms of timescales in the development context.</p>		
<p>7. 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. The separation of Writtle from Chelmsford will be lost.</p> <p>8. It is not clear that consideration has been given to any Landscape Assessments or which Landscape Assessments have formed the basis of the decision on which this pattern of development has been identified as appropriate.</p> <p>9. Mitigation measures and landscape enhancements are not sufficient to mitigate the fundamental issue of urban/ rural coalesce which will occur as a result of this proposed development</p>	<p>A number of landscape sensitivity and capacity assessments (EB 100 A-D) have been prepared to support the Local Plan. These assess the landscape and visual sensitivities to development and landscape value. Recommendations are made on possible mitigation measures, areas where development should be avoided and landscape enhancements.</p> <p>Strategic Growth Site 2 falls within a land parcel that is judged to be of medium landscape sensitivity and medium capacity for low rise residential/employment development, taking advantage of the opportunity to reinstate landscape features using the scale and broader containment of the landform to create a more sympathetic urban edge, in doing so enhancing landscape character.</p> <p>The main built up area of Writtle village lies approximately 0.6miles south of the site allocation and is separated by Roxwell Road and open land within the Green Belt in between. It is not considered that the allocation would result in settlement coalescence between Chelmsford and Writtle.</p>	<p>The proposed development represents the start of an erosion of the rural/ urban boundary of this area of Chelmsford, which will not and cannot be mitigated adequately by the proposals in the Plan.</p> <p>The development will not enhance the landscape character of this area.</p> <p>The development will represent the commencement of coalescence between Chelmsford and Writtle, which will be exacerbated by the transport links required between Chelmsford and the proposed development area.</p>
<p>10. Representations have set out the concern in relation to CCC's strategy in terms of the loss of Grade 2, best quality agricultural land. This has been raised as a general concern in relation to this Plan, but which is exacerbated specifically by this proposal.</p> <p>11. It is accepted that development cannot be achieved entirely on Brownfield land, to achieve the required growth levels within the Plan period. It is not however</p>	<p>An agricultural land classification by Adams Land Management was prepared on the behalf of the site promoter in 2015. This finds that the highest proportion of the site is Grade 3a land and just over a third of the site is classified as Grade 2. Both of these are defined as Best and Most Versatile. The identified development needs for Chelmsford over the plan period cannot be accommodated on previously developed land alone and some loss of agricultural land to development is</p>	<p>The proposed development site requires a significantly higher proportion of loss of higher grade agricultural land than the 2.5/ 2.2% overall in the Plan. This is not appropriate nor has been given adequate weight against other options.</p> <p>The proposed development will have an unacceptable</p>

<p>accepted that it is most appropriate to achieve this on high grade agricultural land. Furthermore, it is not considered that CCC have demonstrated an adequate assessment of the relative merits of development on Green Belt areas v's high grade agricultural land, to inform this strategic approach to the Plan and this site.</p>	<p>inevitable. However, the loss would not be significant and in the context of the amount of Grade 2 and Grade 3 land across Chelmsford's administrative area, the new Local Plan would result in a loss of 2.5% and 2.2% respectively.</p>	<p>impact on landscape, soil, water and flood risk.</p>
<p>12. The Sustainability Appraisal identifies that Development of the West Chelmsford site has a significant negative effect on land use and does not conserve and enhance soil quality. It also states that there is a significant negative effect on the conservation and enhancement of water resources as a result of the proposed development.</p> <p>There is also a significant negative effect on flood risk.</p> <p>Overall there is not enough weight given to this level of impact and there is insufficient certainty in terms of the timing and delivery of the mitigation measures required to deliver this development in a sustainable manner which will not impact the land or surrounding area to an unacceptable level.</p>	<p>It is understood these comments are in relation to Sustainability Objectives set out in the Pre-Submission Local Plan Sustainability Appraisal (SD 004). SA Objective 7 – Land Use and Soils, SA Objective 8 – Water and SA Objective 9 – Flood Risk</p> <p>The appraisal has confirmed the potential for both positive and adverse effects against the SA Objectives for the site allocation.</p> <p>On SA Objective 7, this relates to the loss of Grade 2 and 3 land. This is addressed above.</p> <p>The site allocation policy for West Chelmsford seeks to mitigate the negative effects in relation to water (SA Objectives 8 and 9) through flood mitigation measures and SUDS in accordance with Policy NE3 (flooding/SUDS) which should help maintain water quality and minimise flood risk. Therefore, as set out in Appendix I – Appraisal of Growth Site Policies in the Pre-Submission Local Plan Sustainability Appraisal no significant effects are anticipated.</p>	
<p>13. The site is of considerable archaeological importance and therefore archaeological work will be required to inform any development proposals and it is likely that the design of development will need to be adapted to accommodate these findings. This presents risk in</p>	<p>An Archaeological Assessment (EB 085) has been prepared which assesses the archaeological impact of the proposed site allocations using a 3-tier traffic light scoring system (RAG). Green represents sites which present no concerns for inclusion as a site allocation although may require archaeological investigations or landscape</p>	<p>There is risk that the extent of archaeological remains in this location will impact the nature and amount of development which can be delivered in this area and which should be recognised in the Plan.</p>

<p>terms of both the impact on archaeological remains, but also in terms of the extent of development which can be achieved as the developable area may be reduced by the outcome of these archaeological investigations. The Plan does not adequately reflect this position.</p>	<p>enhancements. Amber represents sites presenting moderate to major impacts which will affect the allocation but can be overcome by design solutions through detailed assessment.</p> <p>West Chelmsford is rated Green/Amber. Included in the site allocation policy is the requirement to undertake an Archaeological Assessment. Therefore, whilst the site may contain some archaeological deposits it is not considered that the development will result in significant adverse effect which would be difficult to mitigate.</p>	
<p>14. 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, including the timing and process for this to ensure that a sustainable development can be delivered which will not impact the existing surrounding community.</p>	<p>Infrastructure requirements are set out in both the site allocation policy and Strategic Policy S11. In addition, the Infrastructure Delivery Plan (June 2018 update) (EB 018B) sets out what infrastructure is required for the Local Plan allocations, including West Chelmsford, and how it will be provided to help the delivery of growth over the plan period.</p> <p>It is considered infrastructure requirements for this allocation are appropriately addressed in the Plan and supporting evidence base.</p>	<p>The Parish Council retain strong concerns in terms of local infrastructure provision and the impact on this as a result of the proposed development.</p>
<p>15. It is unclear from the information available as to the justification for the removal of the allocation from a Mineral Safeguarding Area and the planning policy context for this having been amended to support this. This therefore appears to still represent a potential constraint on the delivery of this site.</p>	<p>A Minerals Resource Assessment in accordance with the Essex County Council's (ECC) requirements for a Minerals Safeguarding Area was undertaken by the site promoter in 2015. This was reviewed by ECC who concluded that whilst there were potential minerals at the site, it was neither practical or reasonable to require prior extraction for the proposed allocation. This conclusion was based on the anticipated circumstances including the nature, scale, depth, quality and location of the minerals as encountered on the site.</p> <p>On this basis, ECC raise no objection to the proposed allocation and there is no constraint on the delivery of development in terms of minerals.</p>	

<p>16. Sustainable development seeks to achieve an improvement in the health and well-being of those living in the Chelmsford City area. In the context of the extent of potential impact in terms of the change in character of the area, the impact on landscape and the pressure on transport and infrastructure, his proposal does not achieve this end. The proposals do not do enough to show how the 'Live Well' community can be achieved and the way in which the step change in living patterns needed to achieve this will be facilitated.</p>	<p>The site is adjacent to the Chelmsford Urban Area in close proximity to a range of services and facilities which can be accessed through sustainable means of transport. The development will also provide a mix of size and types of homes to accommodate different demographic groups in Chelmsford. The site is also being promoted as a 'Live Well' community and will seek to apply for formal accreditation. For these reasons, it is considered that the site does seek to improve the health and well-being of residents.</p>	<p>It is unrealistic to expect significant changes in the living and working patterns of future residents in this area within this Plan period to the extent that they will achieve better health and wellbeing.</p>
---	--	--

Signatories:

Jeremy Potter

Planning and Strategic Housing Policy Manager
Chelmsford City Council

Mick Townley

Vice Chairman
Writtle Parish Council