Chelmsford Local Plan Review Issues & Options Consultation Document October 2022



CHELMSFORD
LOCAL PLAN REVIEW
RESPONSE BY
DANDARA
PROPOSING THE
ALLOCATION OF
LAND NORTH-WEST OF
CHELMSFORD

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Appendix 1

NORTH-WEST CHELMSFORD: DANDARA'S VISION AND DELIVERY STATEMENT

1.0 Summary of representations

- 1.1 These representations have been prepared on behalf of Dandara in support of the promotion of Land North-West of Chelmsford and responds to the Chelmsford Local Plan Review Issues & Options consultation from August to October 2022.
- 1.2 We have responded to a range of policy issues and topics of relevance to North West Chelmsford. As part of this we have supported the Council's proposed new vision for Chelmsford and the Strategic Priorities it has identified for the new Local Plan to address. Dandara believes that the Council is fundamentally taking the right approach in identifying the key challenges that that the emerging Local Plan must address, and in its vision for good growth.
- 1.3 We have also commented on the potential spatial approaches being considered by the Council. In summary, of the five spatial approaches proposed for consultation, our position is as follows:
 - We <u>strongly support options A, B and C</u>, because they represent the most sustainable for the delivery of strategic scale growth - utilising well-connected locations on the edge of Chelmsford's urban area, with easy access to the City Centre by sustainable means. Each of these options would support the allocation of Land North-West of Chelmsford, which is a location for growth that is deliverable, suitable, highly sustainable and wholly in accordance with the Council's identified strategic objectives and Priorities.
 - We <u>support option D</u> insofar as it also proposes growth on the edge Chelmsford, but <u>we do not support</u> the notion of large scale, strategic growth being directed to transport corridors at the expense of more sustainable options such as North West Chelmsford. We would support development in transport corridors where it would enhance the viability and vitality of well-connected existing villages, but this must be part of a balanced spatial strategy that directs the majority of growth to highly sustainable locations on the edge of Chelmsford City.
 - We <u>oppose option E</u> which proposes a large new settlement at Hammonds Farm. We do not consider this option as being as suitable or sustainable as the alternative options, or as closely aligned with the Council's emerging vision and priorities for Chelmsford. Furthermore, there are inevitably very serious risks associated with the deliverability of new standalone settlements, particularly in a local authority area where one Garden Community is already allocated to deliver a large proportion of the City's growth requirement. A more flexible and deliverable approach is required.

2.0 Dandara's vision for a highly sustainable new neighbourhood at North West Chelmsford

- 2.1 Dandara controls 81ha of land adjoining the existing urban area at North-West Chelmsford, directly to the north of the West Chelmsford Strategic Growth Site (Warren Farm) allocated in the adopted Local Plan. Dandara is proposing the delivery of a highly sustainable, exemplar new neighbourhood on this site.
- 2.2 Dandara has prepared a Vision and Delivery Statement and a conceptual masterplan to illustrate the opportunities presented by the site, attached to these representations at Appendix 1. It anticipates delivery of circa 780 new homes and a new primary school and neighbourhood centre accommodating a range of new community infrastructure, alongside substantial amounts of new green infrastructure and retained agricultural land.
- 2.3 Critically, Dandara's proposals would respond to and deliver on the City Council's vision for Chelmsford to guide its growth towards a greener, fairer and more connected community and the Strategic Priorities proposed in the Plan. North-West Chelmsford is one of few potential locations for growth that can offer the delivery of a genuinely sustainable pattern of development meeting the need for new homes within walking and cycling distance of Chelmsford City Centre, and where existing services, facilities and infrastructure can be supported and improved.
- 2.4 The site is also ideally placed to utilise and substantially extend Chelmsford's green wedge network, offering five key benefits:

1) Active travel

The site's landscape features will support the creation of high-quality green infrastructure and active travel corridors, connecting to adjacent neighbourhoods, local services and the City Centre - and reducing car dependency.

2) Landscape and townscape

The alignment of the River Can tributary on the site's western boundary provides a unique opportunity to create an enhanced, green settlement edge for Chelmsford - easing the transition between urban and rural and bringing the countryside into the City.

3) Ecology

Enhanced green infrastructure will deliver substantial net gains for biodiversity, integrated seamlessly alongside new homes and community facilities - ensuring green growth that addresses the Climate and Ecological Emergency declared by the City Council.

4) Recreation

New open spaces created to utilise and respect the setting of key heritage and landscape assets on Chelmsford's urban edge will deliver high-quality recreational opportunities - for new and existing residents of the City to enjoy.

5) Health & wellbeing

Genuine active travel opportunities and enhanced access to green infrastructure, open space and nature will support healthy lifestyles - and improve the health and well-being of Chelmsford residents.

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2.5	Dandara's site analysis and emerging proposals for the site are articulated in more detail at Appendix 1. We look forward to working with Chelmsford City Council, its consultees and the community to progress the proposals alongside the preparation of the new Local Plan.

3.0 Responses to the Consultation Questions

Part 2: Context

- Q1. Do you agree with the challenges and opportunities identified for the review of the adopted Local Plan? If not, please explain why. Where possible, please support your answer with reference to any evidence.
- 3.1 Yes, we agree with the challenges and opportunities identified in the review of the Local Plan.

 This scope of matters is reflected in the Integrated Impact Assessment and therefore is included fully within the scope of its assessment of the potential spatial options and alternatives.

Part 3: Vision (Chelmsford in the future)

Q2. Do you agree with the proposed new Vision? If not, please give the reasons for your answer.

- We support the proposed updated Vision insofar that it is concise but cross-references further detail in the "Our Chelmsford Our Plan" document. The updated Vision is shorter than the adopted Vision which means it is more flexible to change, but it should not lose sight of the need to focus its attention on the City of Chelmsford itself, through which much of the administrative area's growth stems and is generated. The Council's vision focuses on the right priorities responding to housing and other development needs to support growth and reduce inequality whilst connecting communities and addressing the climate and biodiversity crisis.
- 3.3 North-West Chelmsford is one of few potential locations for growth that can fully deliver on this vision offering the potential to enable a genuinely sustainable pattern of development that meets the need for new homes and community facilities within walking and cycling distance of Chelmsford City Centre, and where existing services, facilities and infrastructure can be supported and improved. It would deliver a fairer and more connected Chelmsford, supporting growth whilst reducing car dependency and creating substantial amounts of green infrastructure that will enable active travel and address the Climate and Ecological Emergency.

Part 4: Our Strategic Priorities

Q3. Do you agree with the proposed updates to the Strategic Priorities? If not, please give the reasons for your answer. Please refer to the Strategic Priority number in Table 4.

- 3.4 Yes, we agree with the updated Strategic Priorities, themed around action on Climate, Growth and Place. Each of these three themes has its own set of priorities which provide a significantly more detailed and therefore robust framework for the selected spatial strategy to sit within.
- 3.5 Naturally, all new site allocations for growth should address the Strategic Priorities. Dandara's Vision for Land North-West of Chelmsford shows how the Site would deliver growth in accordance with these priorities.

- 3.6 Allocating growth at North-West Chelmsford would align completely with the Council's emerging Strategic Priorities.
- In respect of Priorities for Climate, growth at North-West Chelmsford would address the Climate and Ecological Emergency because it would enable smart, active travel and use of sustainable transport locating new housing within walking and cycling distance of the City Centre and close to employment, services and existing public transport infrastructure. It would reduce dependency on fossil fuelled, private vehicles and, by association, cut traffic and congestion across the City Council's wider administrative area. Being planned at scale, it also provides plentiful opportunities to enhance green infrastructure, ecological networks and biodiversity and to manage and reduce flood risk. Growth in this location will help to ensure that new development moves towards delivering net-zero carbon emissions.
- In respect of the Priorities for Growth, the allocation of Land North-West of Chelmsford would support the delivery of much needed new housing and community facilities at the top of the settlement hierarchy, adjacent to the only city in the Council's administrative area and close to existing facilities, enabling residents to wall, cycle and use public transport and be less reliant on the car. Critically, it would also protect the Green Belt from inappropriate development. Planning at scale in North-West Chelmsford would ensure the provision of a mix of high-quality new homes that meet people's needs (including market, affordable, specialist and starter homes) alongside a new primary school and other community infrastructure. Growing the City in this location would also be easily deliverable, without the long lead-in times associated with new settlements and strategic scale growth locations further from the City Centre and core urban area. Designating growth at North-West Chelmsford will provide the City with a more robust and flexible housing land supply.
- In respect of the Priorities for Place, North-West Chelmsford represents an exceptional opportunity to create a new neighbourhood of distinct character, utilising exiting heritage and landscape assets and the creation of new green infrastructure to extend the green wedge network and create a living environment of the highest quality. It has the potential to bring the countryside in the City and ease the transition between urban and rural, enhancing the identity of Chelmsford in the process. In so doing, it would facilitate the and encourage active, healthy lifestyles and living environments, with quality housing, community facilities and comprehensive walking, cycling and sustainable transport infrastructure integrated with enhanced biodiversity networks into a single masterplanned area. It would maximise the efficient utilisation and enhancement of existing infrastructure and support the vitality and resilience of Chelmsford City Centre, which would be within easy reach of the new neighbourhood.
- 3.10 Overall, we strongly support the Strategic Priorities which completely align with Dandara's Vision for North-West Chelmsford.

Part 5: Delivering the updated Vision and Spatial Principles

Q5 - Q8. Addressing the Climate and Ecological Emergency

3.11 The Council declared a Climate and Ecological Emergency in July 2019 and agreed the Climate and Ecological Action Plan in January 2020. Any plan which supports the declaration must be

ambitious and far reaching in terms of benefits and impact and ensure that a "business as usual" scenario is avoided.

- We agree that the emerging Local Plan plays a vital role in assisting the Climate and Ecological Emergency Action Plan. We welcome the areas proposed for new policies or significant changes to existing local policies. It is agreed that more emphasis on energy efficiency measures, net-zero homes, tree-lined streets and reduced water use are necessary to address climate goals. We are supportive of the Council's efforts to be proactive in addressing the Climate and Ecological Emergency while recognising that flexibility is required to enable all sites to provide measures that are appropriate to their location and constraints.
- 3.13 New neighbourhoods will clearly play a huge role in addressing the climate agenda. New developments can help offset carbon through tree planting and other measures and can encourage existing and new communities to adopt more sustainable methods of travel, including walking and cycling through the provision and extension of existing open space and attractive green linkages. They can also help alleviate existing fluvial and pluvial flood risk issues by providing Sustainable Urban Drainage Systems and other types of green or grey infrastructure.
- 3.14 Dandara fully embraces the need for sustainable design in new development and is willing to work with the Council to create an exemplar new community in this regard at North-West Chelmsford. This could build on the inherent sustainability of the location of the site and the opportunity it presents to enhance Chelmsford's green infrastructure by adopting a range of sustainable construction techniques in the new homes and community infrastructure proposed, including outstanding energy efficiency, all electric heating, EV charging and use of renewable energy. Dandara is keen to engage further with the Council as its development concept progresses.

Q9 - Q13. Promoting Smart, Connected Active Travel and Sustainable Transport

Q9. Do you agree with the proposed approach being taken?

3.15 Yes, we broadly support the approach being taken towards the promotion of active travel because this can play a huge role in the transition to the wider use of more sustainable modes of transport across the City. However, the Council should not limit itself to the scope of initiatives and schemes that have already or are being delivered across Chelmsford under paragraph 5.13. Many of these schemes, such as the Chelmsford Local Cycling and Walking Infrastructure Plan and Chelmsford City Growth Package, are within the control of Essex County Council. The Local Plan should look forward and seize opportunities to build on these initiatives through the allocation of new developments sites that benefit from excellent locational attributes, such as North-West Chelmsford, and where the vision for development aligns with the objectives of the City Council.

Q11. Do you have any views on the areas identified for additional or enhanced policy requirements.

3.16 The proposed policy changes appear to be focused on smart travel technologies but are lacking in respect of active travel. Active travel opportunities need to be included in the list of changes

because they are the most sustainable of all travel options and offer distinct health and wellbeing benefits. In a post-Covid environment, there is also an increased enthusiasm for active and personal travel solutions for day-to-day trips that do not involve cars. This is particularly important if the Council is to allocate new development sites around the City because of the transport impacts it would be necessary to mitigate and design for, at scale.

3.17 The policy changes also need to reflect the expectations of LTN 1/20 so that high quality cycle infrastructure is provided in development sites and around the City. This is important because it means that sites with excellent locational attributes, such as North-West Chelmsford, are allocated so that they can positively contribute towards the promotion of connected active travel and sustainable transport across the City.

Q12. Do you have any views on the proposed ideas for new policies?

- Yes, we agree with the 15/20 Minute Walkable Neighbourhoods concept because it supports the idea of larger scale development, masterplanned in a way that can meet its own requirements with a mix of uses and facilities. The concept should not just be limited to the inward-facing aspect of new developments, but also how they can strengthen connectivity to external nearby services, facilities and natural assets within the 15/20-minute zone.
- 3.19 Land North-West of Chelmsford is of a scale and in a location that is ideally suited to creation of a 15/20 Minute Walkable Neighbourhood. Dandara's emerging vision includes the provision of around 780 new homes based around a new neighbourhood centre that will include a new primary school and a range of other community facilities. It is also within a short walk or cycle of existing higher order services and facilities, including Morrison's supermarket and Chelmsford Sport and Athletics Centre, and well-placed to connect into and enhance Chelmsford's green infrastructure network to maximise opportunities for sustainable travel. These include the Green Wedge network which the masterplan in our Vision shows prospective connections into, in addition to the vast network of green infrastructure that would come forward within the site itself.

Q17 - Q20 Natural Environment

- We agree that natural environment policies need to ensure they are up to date with the most recent legislation and guidance, be that national or at a local level.
- 3.21 It is considered that the adopted natural environment policies are broadly consistent with the National Planning Policy Framework, and the Council's evidence suggests they are working effectively.
- 3.22 We recognise a need for policies regarding the amount of Biodiversity Net Gain (BNG) developments should deliver within the Local Plan. However, providing policies which exceed the national requirement could be problematic and we are concerned that if the Local Plan were requiring 20% BNG it could impact the viability of a large number of developments. The Council will be aware that any requirement that is above what is set out in the NPPF will need to be fully justified and evidenced.

Under the Environment Act 2021, all planning permissions granted in England will have to deliver a minimum of 10% BNG from November 2023. If Chelmsford were to require a larger amount of BNG to be delivered, we would suggest that any policy wording recognises that where it cannot be achieved on-site, off-site provision or financial contributions should be made subject to viability. Policies should be worded carefully in this regard, as to not prevent the supply of housing in the absence of BNG higher than that required by the Environmental Act.

Q21 - Q23 Ensuring Sustainable Patterns of Development and Protecting the Green Belt

Q21 – Do you support the approach to be taken?

- Yes, we agree with the approach to be taken in respect of the role of Green Wedges. We agree that these can provide a significant contribution to accommodating active travel corridors to link the City Centre with existing and new development on the edge of the City. We agree with the proposals to identify opportunities to upgrade existing pedestrian and cycle paths and access and/or create new opportunities. Planning new development in a way that reinforces and grows the Green Wedges would create overlapping benefits in respect of:
 - Sustainable transport benefits;
 - Ecology benefits;
 - Landscape benefits;
 - Leisure benefits; and
 - Health & wellbeing benefits.
- 3.25 But this unique and compelling combination of benefits can only be secured if the Green Wedges are utilised and expanded upon, through the strategic allocation of further suitable sites on the edge of the City, such as North West Chelmsford.
- In respect of the Countryside and Green Belt, we agree with the approach taken in the document, to not make any significant changes to the policies from the adopted Local Plan. The existing policies reflect the NPPF and steer growth to the most sustainable locations. We appreciate that Chelmsford is a Green Belt authority, and that it is important to protect the extent of the Green Belt in line with National Policy. We therefore support that the boundaries should only be amended in exceptional circumstances and that the authority has to fully examine all reasonable alternatives for meeting its need in the first instance. It is clear through evidence in the SHELAA and SASEA that there are significant opportunities outside of the Green Belt to accommodate the additional growth requirement going forward to 2041.

Q28 - Q32 Meeting the Needs for New Homes

3.27 We agree with the Council's approach to plan for more than the minimum housing requirement. Adopting a 20% supply buffer is a robust strategy because it provides more flexibility to the delivery of housing. This would also ensure the consistent delivery of homes to support additional, un-forecasted economic growth, which will also ensure that affordability issues within Chelmsford do not exacerbate. In addition, by planning for more housing it allows for more

flexibility in the Council's strategic approach and allows for growth to be directed to more locations across the plan area.

- The Council should also be mindful that planning for large scale development across the City area, through the allocation of large but deliverable sites on the edge of the City's urban area such as Land North-West of Chelmsford, strikes an appropriate balance between the delivery of small-scale sites in the short term and strategic scale sites that feed the trajectory into the longer term. Smaller scale developments would be unlikely to deliver the cumulative extent of strategic and local infrastructure required to serve the Plan and this would therefore compromise the Plan's Strategic Objectives. Conversely, an over-reliance on strategic scale development, such as a new settlement at Sandon or further reliance on new communities the delivery of strategic infrastructure at North-East Chelmsford, runs the risk of non-delivery of the Plan in the event of slower delivery rates and/or a change in market forces during the lifetime of the construction period. As the adopted Local Plan already relies upon North-East Chelmsford Garden Community, adopting a second new settlement option, as a means of meeting the needs for new homes across the City would be particularly risky in this context.
- 3.29 We therefore agree with the Council's approach to plan for more than the minimum housing requirement as this the Plan would evidently be positively prepared. The Council needs to ensure that the strategy is deliverable through the allocation of sufficient large-scale allocations in easily deliverable, sustainable locations on the edge of the City.

Q43 – Q47 Design. Do you support the approach being taken? If you disagree, please explain why.

3.30 We agree that high quality design is essential to making places more attractive, sustainable, distinctive and safe.

Q48 - Q50 Infrastructure

- 3.31 We agree that the provision of appropriate and timely infrastructure to support growth is important to the continuing prosperity, attractiveness and sustainability of Chelmsford. It should be recognised that growth and housing allocation within communities can also contribute to improved infrastructure within these locations, with the potential provision of walking and cycle routes subsequently contributing to meeting the Council's aspiration in improving sustainable and active travel opportunities.
- 3.32 We welcome the Council's recognition that the need for new infrastructure requirements should not impact the viability of developments. This would minimise the unnecessarily costly infrastructure that will place a burden on CIL and S106 contributions to the detriment of delivering other policy aspirations, such as affordable housing, education and health facilities. Moreover, it is important that any future Local Plan policies are future proofed and allow for flexibility to take account of any changes that come forward at a national level, as the Government is currently considering different options to the current CIL and S106 approaches.

Part 6: Spatial Principles and Spatial Options

Q57. Do you agree with the proposed updates to the Spatial Principles?

3.33 Yes, we agree to the proposed updated Spatial Principles, which completely align with a potential growth option at North-West Chelmsford and Dandara's vision for the site. The aspirations to (a) locate development at well-connected, sustainable locations, (b) protect the Green Belt from inappropriate development and (d) continue and enhance the renewal and vitality of Chelmsford City Centre and its Urban Area are particularly pertinent. The latter will continue to recognise and support the primacy of Chelmsford City as the main commercial, leisure, retail and residential centre within the Council's administrative area.

Q60. Do you support the approach to be taken to review the Spatial Strategy?

Yes, we agree with the proposed approach to review the complete strategy to ensure that necessary employment, community and social facilities are provided at new site allocations to serve new development and the existing communities. The scale of growth needed within the Plan period is sufficient to require a fresh review in this respect.

Q61. Do you agree with the scope and classification of individual settlements within the Settlement Hierarchy?

- Yes, we agree with the classification of Chelmsford as the City at the very top of the hierarchy. It therefore follows that the most sizeable proportion of new growth should be directed to the City, which provides the greatest opportunity to address the Council's Strategic Objectives at scale, and in a way that represents the most sustainable option.
- This view is supported by the Employment Land Review (2015) which highlights that Chelmsford has been a major driver of growth within the Heart of Essex sub-region. The Integrated Impact Assessment ("IIA") identifies at 3.4.27 that larger services such as schools and health facilities are predominantly focused within the two main urban areas which include Chelmsford. The IIA also identifies at 3.4.28 that with some 125,000sqm of retail floorspace in the City Centre, Chelmsford performs well against other towns and is attractive to new investors given its socioeconomic and demographic composition.
- 3.37 Taking account of the above, it is entirely logical for the City of Chelmsford to remain at the top of the settlement hierarchy and act as the focus for future growth in the Plan.

Q62. How do you feel about the types of locations for potential housing development growth?

Options A (Growing the existing strategy), B (growth in Urban Areas) and C (wider strategy)

3.38 We <u>strongly support options A, B and C</u>, because each of these options propose the expansion of allocated sites to the West and East of Chelmsford comprising 1,500 dwellings across these areas. These options are wholly sustainable in approach, making best use of well-connected

locations for growth that can utilise, support and expand existing infrastructure and services for the benefit of all residents. This approach would align with the allocation of Land North-West of Chelmsford to deliver a highly sustainable, exemplar new neighbourhood. This land is controlled by Dandara and its development would be deliverable, suitable and wholly in accordance with the Council's identified strategic priorities and its vision to create a greener, fairer and more connected community.

- Options A to C would direct the lion's share of growth to the City, reinforcing the role of Chelmsford at the top of the settlement hierarchy and as the main centre for employment, services, leisure and culture. Pursuing these options would ensure that:
 - Significant benefits would be realised in respect of housing, the economy, sustainable living and revitalisation, and health & wellbeing reflecting the concentration of new development within ready access to existing services and opportunities for regeneration. It would ensure that prospective residents and workers have good access to key services, promote urban renaissance (including through the provision of services and facilities) and could help to address pockets of deprivation that exist in the Urban Area. These items are all identified as accruing significant positive effects in the IIA.
 - The Plan would be an appropriate response to the three key Priorities for Climate, Growth and Place. It would respond to the Priority for Climate because it would ensure development adapts to minimise adverse impacts that create climate and ecological change, by reducing carbon emissions by reducing the need to travel and associated emissions to air, and by prioritising active and sustainable travel. It would respond to the Priorities for Growth because it would ensure sustainable patterns of development, reinforcing the role of Chelmsford at the top of the settlement hierarchy. It would respond to the Priority for Place because it would promote the health and wellbeing of communities, encouraging healthy lifestyles and living environments for residents by providing new green spaces, quality housing and enhances walking and cycling infrastructure.
 - The role of the Green Wedges would be reinforced as the heart of Chelmsford's green infrastructure network, according with the stated objectives to maximise public enjoyment of the river valleys, protect and enhance ecological health and diversity, preserve local landscape and wildlife links between the countryside and Chelmsford's urban area.
 - Essex County Council's vision for Chelmsford's future transport network to become 'best in class' would be realised, rivalling similar cities across the UK offering enhanced connectivity, and access to opportunities for residents, visitors and businesses to support the sustainable economic growth of the city. This would accord with Chelmsford's Future Transport Network Proposal (2017).
- The key advantage of delivering growth under Options A, B or C is that it would deliver significant positive effects for sustainable living and revitalisation, as assessed under Objective 4 in the IIA. This is what sets these Options apart from the others, because it would deliver regeneration opportunities in accordance with the established approach. In supporting and enhancing the City of Chelmsford by attracting new commercial investment and reinforcing the City's attractiveness, encouraging more people to live in urban areas, increasing access to schools, employment, facilities and services, it would align investment in services with infrastructure and growth. In doing so it would therefore accord with the three new Strategic Priorities proposed in the Plan.

- Dandara's vision for Land North-West of Chelmsford is set out at Appendix 1 to these representations. It illustrates how the site can deliver a highly sustainable, exemplar new neighbourhood that would address the City Council's new vision for Chelmsford the Strategic Priorities proposed in the Plan. North-West Chelmsford is one of few potential locations for growth that can offer the delivery of a genuinely sustainable pattern of development meeting the need for new homes within walking and cycling distance of Chelmsford City Centre, and where existing services, facilities and infrastructure can be supported and improved.
- It is also ideally placed to utilise and substantially extend Chelmsford's green wedge network, offering five key benefits:

1) Active travel

The site's landscape features will support the creation of high-quality green infrastructure and active travel corridors, connecting to adjacent neighbourhoods, local services and the City Centre - and reducing car dependency.

2) Landscape and townscape

The alignment of the River Can tributary on the site's western boundary provides a unique opportunity to create an enhanced, green settlement edge for Chelmsford - easing the transition between urban and rural and bringing the countryside into the City.

3) Ecology

Enhanced green infrastructure will deliver substantial net gains for biodiversity, integrated seamlessly alongside new homes and community facilities - ensuring green growth that addresses the climate and ecological emergency.

4) Recreation

New open spaces created to utilise and respect the setting of key heritage and landscape assets on Chelmsford's urban edge will deliver high-quality recreational opportunities - for new and existing residents of the City to enjoy.

5) Health & wellbeing

Genuine active travel opportunities and enhanced access to green infrastructure, open space and nature will support healthy lifestyles - and improve the health and well-being of Chelmsford residents.

3.43 We urge the Council to recognise the benefits of growth in this location and engage with Dandara on its emerging proposals for the site as preparation of the Local Plan continues to progress.

Option D (growth along transport corridors)

- 3.44 We <u>support option D</u> insofar as it also proposes growth on the edge Chelmsford, but <u>we do not support</u> the notion of strategic scale growth being directed away from the City at the expense of more sustainable options in better connected locations such as North West Chelmsford.
- 3.45 We do not consider this spread of growth is as sustainable as either of options A, B or C simply because it deprives Chelmsford of the scale of growth it warrants as the only City in the Council's administrative area, and its position at the top of the settlement hierarchy. It could also limit the

scale of allocations on the edge of Chelmsford and artificially reduce their ability to deliver the full range of supporting infrastructure that is otherwise possible, including new primary schools and other community facilities. This would also fail to take opportunities to deliver active travel and sustainable transport connectivity and ready access to employment opportunities within Chelmsford's urban area.

- 3.46 We support the idea of development in transport corridors where it would enhance the viability and vitality of well-connected existing villages, but this should be part of a balanced spatial strategy that directs strategic scale growth to highly sustainable locations on the edge of Chelmsford City, such as North West Chelmsford.
- 3.47 Option E (new settlement)
- 3.48 We <u>oppose option E</u> which proposes to direct growth to a large new settlement option at Hammonds Farm.
- This option is the least sustainable and least well aligned with the Council's emerging Vision and Strategic Priorities for Chelmsford, due to the more isolated location of the site. It would be less likely to encourage active travel and use of sustainable transport infrastructure and would offer a less effective role in supporting the resilience and vitality of the City Centre especially given the site's proximity to the A12 which would encourage access to Lakeside, Bluewater and other regional destinations by private car.
- 3.50 Furthermore, there are inevitably serious risks associated with the deliverability of any standalone new settlement, as proven by the outcomes of the independent examination of Braintree, Colchester and Tendring's recent proposals for the North-Essex Garden Communities. These risks are especially pertinent in Chelmsford, where one new Garden Community is already allocated to deliver a large proportion of the City's growth requirements. The deliverability of Hammonds Farm is yet to be proven and it should not be relied upon during the emerging Plan period.
- 3.51 The IIA identifies that selecting this option would compromise the benefits of growth elsewhere in Chelmsford, such as the Urban Area. This would have serious consequences for the range of sustainability factors and run contrary to the identified settlement hierarchy.
- This option would create an unnecessary over-reliance on a strategic scale new settlement, which in turn would fail to maintain sufficient flexibility. We would urge the Council to only consider growth at Hammonds Farm when all of the other more sustainable and better-connected locations have been exhausted.

APPENDIX 1

NORTH-WEST CHELMSFORD: DANDARA'S VISION AND DELIVERY STATEMENT

