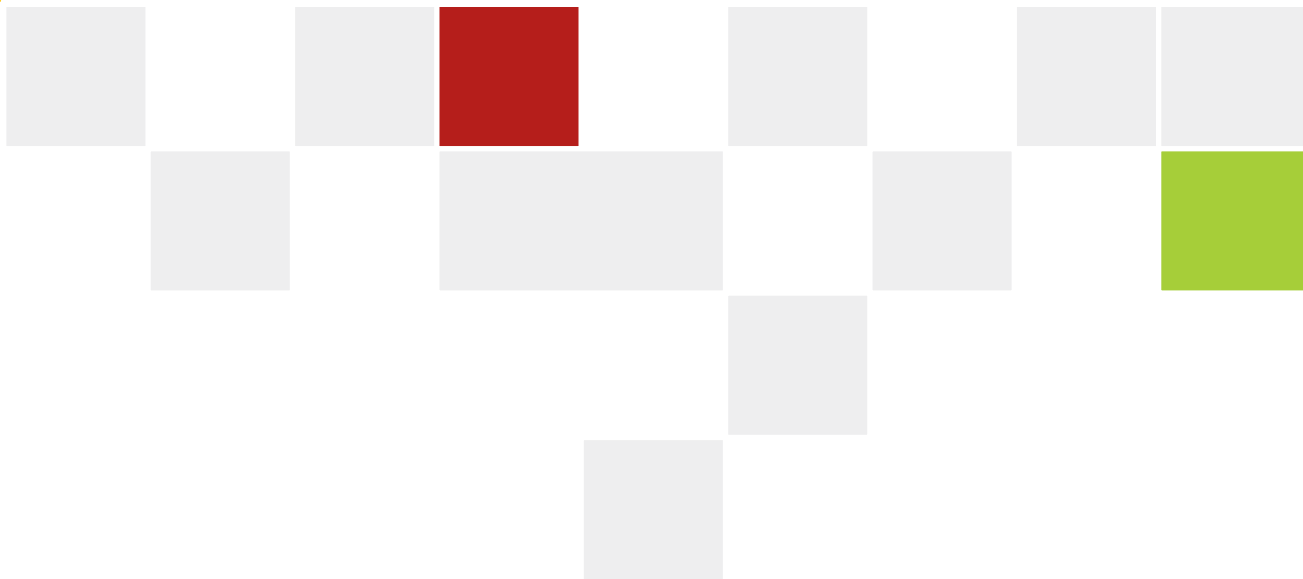


Land at Ongar Road, Writtle

Chelmsford Local Plan Review, Issues and Options Consultation



Boyer

Report Control

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1. INTRODUCTION

- 1.1 These representations have been prepared by Boyer on behalf of Hill Residential Ltd. Residential Ltd, in response to the Chelmsford Local Plan Review 2022 Issues and Options (Regulation 18) consultation. At this stage of the review there are no draft policies, rather these representations respond to the overall strategy and vision for the next stage of the Local Plan Review.
- 1.2 These representations make specific reference to land at Ongar Road, Writtle (“the Site”). The site is being promoted for future development and these representations relate to the overall strategy proposed in this emerging Local Plan and the development potential of this site. The site represents a sustainable location for development and is considered a logical organic extension to Writtle that is capable of providing residential development to meets the housing need of Chelmsford.
- 1.3 Whilst it is not possible to comment on the soundness of the Plan at this early stage, as the Local Plan Review progresses it will need to be prepared in accordance with paragraph 35 of the National Planning Policy Framework (NPPF) including whether the plan is:
 - a) Positively prepared:
 - b) Justified;
 - c) Effective; and
 - d) Consistent with national policy.
- 1.4 These representations provide our response on behalf of the Hill Residential Ltd. to the Issues and Options questions and reflects the chronological order of the sections and sequence of questions included within the consultation document.
- 1.5 For the readers’ ease, we have focussed on common themes from the questions in the consultation document and provided our comments against individual questions or groups of questions below. Where possible we have sought to indicate the relevant section of the consultation document or the questions we are responding to.
- 1.6 At this early stage of Local Plan preparation, we have sought to identify the areas and topics that the Local Planning Authority will have to consider as a robust and credible evidence base on which to inform future planning policies is established. We look forward to continuing to engage with the Council on future stage of plan preparation as set out in the Local Development Scheme which targets adoption of a Local Plan review in 2025.

2. REVIEW AND RESPONSE TO ISSUES AND OPTIONS CONSULTATION DOCUMENT

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.

- 2.1 Whilst we agree with many of the key challenges and opportunities identified for the review of the adopted Local Plan, we do not agree with the Council's intention to not change the general approach of the Plan. As it stands, the adopted Local Plan focuses new development within Chelmsford Urban Area, urban extensions and in Key Service Settlements outside the Green Belt. Our view is that the Council should adopt a more diverse strategy, which encourages growth through positive site allocations in all sustainable settlements (to include within the Green Belt and every category of the settlement hierarchy) across the plan area which will support existing services and facilities and maintain viability of communities.

Part 3: Vision

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

- 2.2 We note that the updated vision proposed by the Council is "Guiding Chelmsford's growth towards a greener, fairer and more connected community."
- 2.3 We welcome this shortened and more focussed vision as it is more concise, whilst still encouraging positive growth within the Chelmsford City administrative area. The vision is aspirational but we consider that it lacks ambition and may not provide the strategic direction and flexibility to address future challenges and priorities that arise over the plan period. The current vision is considered too long with some details needing to be updated and revised. When the vision is kept short and concise, the rest of the Local Plan can provide the details as necessary.
- 2.4 Compared to the current vision, the new updated version is more applicable to the entire Chelmsford City Council plan area and not just focussed on Chelmsford Urban Area. Any vision which is guiding growth and development in Chelmsford should be inclusive of and relevant to for all parts of the plan area such as the Green Belt and a wider range of sustainable settlements, as opposed to being too focussed on the main urban area of Chelmsford City.

- 2.5 With appropriate masterplanning and design, a positive site allocation for land at Ongar Road, Writtle will be able to help the Council achieve its vision. Land at Ongar Road can be developed to align with the Council's vision in the emerging Local Plan as well as those in the Council's updated Corporate Plan. By taking a proactive approach to assessing Green Belt and identifying sustainable site for allocation, this site in Writtle will be able to provide housing alongside other community provision, providing biodiversity net gain (BNG) on site. Together with extensive areas of public open space that could include informal recreational opportunities for all ages and contribute towards local infrastructure through the Community Infrastructure Levy.

Part 4: 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.

- 2.6 We agree to the proposed updates to the Strategic Priorities and the Local Plan provides the opportunity to review these. We consider that the new, and the older priorities that have been carried forward are in line with current guidance and the NPPF and are the strategic starting point for the Local Plan review.
- 2.7 We welcome the initiative to divide and group the strategic priorities into the three themes of climate, growth, and place, and that the themes are then brought through to Part 5 of the Issues and Options document where they are addressed again. This makes the idea behind each strategic priority clear, and it becomes evident how the development management policies are supporting and linked to the overarching themes.
- 2.8 The proposed priorities for climate are clear in what they want to achieve, mitigating CO2 emissions and adopting to the impacts of climate change, whilst still encouraging innovation and growth. The two new proposed strategic priorities are seen as positive additions as they will favour developments that are sustainable, promotes active travel, and mitigate environmental risks such as flooding.
- 2.9 We agree with the proposed priorities for growth as they are ensuring that new development is in sustainable locations and addresses the need for more housing in the Chelmsford City administrative area. We appreciate that Chelmsford is a Green Belt authority, and that it is important to protect the Green Belt. However, the NPPF allows for Green Belt release in exceptional circumstances, and the Local Plan Review is an opportunity for the Council to undertake a detailed and evidence led review of the Green Belt Boundaries and not just carried forward into the new plan.

- 2.10 Proposed Strategic Priority 4 “Ensuring sustainable patterns of development and protecting the Green Belt” is detailed under priorities for growth. In line with the NPPF, the Council is seeking to protect the Green Belt but in order to do this the Council should be ensuring that the evidence base is robust and justified. As detailed in NPPF paragraph 140 the preparation or updating of plans is an opportunity to consider the Green Belt boundaries. As part of a Local Plan the Council need to be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development (NPPF para 141).
- 2.11 Reviewing the strategic priorities which provide the foundations for the Local Plan is justified but to be robust and credible the Council will need to consider opportunity for developments in a wider range of sustainable settlements across the plan area. By taking a more positive approach to growth in the Green Belt and settlements in every category of the settlement hierarchy notwithstanding their Green Belt status, sustainable development can be achieved across the whole plan area to help address the climate emergency and in turn increases the viability and vitality of settlements by supporting existing services and facilities as well as providing new ones where necessary.
- 2.12 Further comments on the themes and their priorities can be found below.

Part 5: Delivering the updated Vision and Spatial Principles

Q5 – Q8 Addressing the Climate and Ecological Emergency

- 2.13 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 has to be ambitious and far reaching in terms of benefits and impact and ensure that a “business as usual” scenario is avoided. If this is to be avoided, bold choices need to be made in this Local Plan Review to ensure that the most sustainable developments are brought forward.
- 2.14 We agree that the Local Plan plays a vital role in assisting the Climate and Ecological Emergency Action Plan. We are supportive of the Council’s efforts to be proactive in addressing the climate and ecological emergency while also recognising that flexibility is required to enable all sites to provide those measures that are most appropriate for its location and that respond to the site constraints.
- 2.15 It is clear that new residential developments can play an important role in the climate agenda. New developments can help offset carbon through the use of modern construction methods and technologies that reduce the impact on the environment, alongside tree planting and other measures and can encourage existing and new communities to adopt more sustainable methods of travel. This includes walking and cycling through the provision of attractive open spaces and green linkages.
- 2.16 New developments can also help alleviate existing fluvial and pluvial flood issues by providing Sustainable Urban Drainage Systems and other types of green or grey infrastructure.

- 2.17 We welcome the areas proposed for new policies or significant changes to existing local policies. It is agreed that more emphasis on energy efficient measures, net-zero homes, tree-lined streets, water use, and recycled materials are necessary to meet the climate goals.
- 2.18 However, we believe that policies relating to climate change should not be overly prescriptive and should not apply a blanket approach to additional climate adaptation on all new developments, as this can render a development unviable. The policies need to remain flexible to ensure the appropriate measures are provided in the most appropriate developments through a fabric first approach to modern technologies and construction techniques as well as enabling flexibility for the developers of each site.
- 2.19 Land at Ongar Road, Writtle is being promoted by the Hill Residential Ltd. As a long standing and established developer, the Hill Residential Ltd. is committed to high quality builds which are environmentally friendly. New homes are built to exceptionally high standards which energy efficient appliances, modern glazing, increased insulation, ventilation systems and low energy lighting as standard. Together this approach means that the new homes are more energy efficient and cheaper to run and therefore align with the Council priorities.

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

- 2.20 We agree that it is important for the Local Plan Review to reflect changes to travel behaviours and seek to promote smart, connected active travel and sustainable transport options across the plan area. There is a need to ensure that developments are located in accessible and connected locations and sites in the Green Belt should not be excluded from providing these opportunities to support the network and assist in providing more sustainable modes of travel.
- 2.21 Alongside provision of active travel and sustainable transport options, we also welcome the acknowledgement that electric vehicles and electric vehicle charging points are becoming increasingly common and will even more so over the plan period. The Local Plan Review is right to identify this opportunity but needs to acknowledge that they are only part of the solution.
- 2.22 Developments can seek to provide the necessary charging infrastructure on individual plots but provision will also be needed across other locations such as destinations, places of employment and recreation to expand the network.
- 2.23 As detailed in paragraph 5.17 of the Issues and Options document a greater focus on active travel and sustainable transport, reducing reliance on fossil fuels and increasing provision of electric vehicles alongside innovations in smart technology can bring forward fundamental changes to travel behaviours across the plan area. Each of these will require all settlements and all communities to play their part in achieving these objectives and the Local Plan should be acknowledging that by encouraging development in all sustainable settlements.

- 2.24 Writtle is well located to the services and facilities available in Chelmsford and therefore can offer opportunities to encourage active travel and support the Council's objectives through promoting walking and cycling connections as well as bringing forward a development that aligns with the 15/20 minute walkable neighbourhoods.
- 2.25 We support the idea of 15/20 minute neighbourhoods being explored in urban areas across Chelmsford that can accommodate the residential densities needed. However, a policy which promotes walkable neighbourhoods, but takes into account the context of each site, would be more beneficial to the plan area. A flexible approach to the policy could allow for some developments, depending on their local context, to accord with the principles that are appropriate. This way sustainable development that promotes active travel can be reached in locations outside of the urban area.

Q17 – Q20 Natural Environment

- 2.26 We agree that all 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.
- 2.27 It is considered that the existing adopted natural environment policies are broadly consistent with the NPPF, and Council evidence suggests they are working effectively.
- 2.28 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 will lead to the need for more land to be allocated for future development (more land will be needed to provide for the quantum of development planned for) as well as potentially having an impact on 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.
- 2.29 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

- 2.30 It is noted that the Council provides policy guidance for the Green Belt as part of their policies for the countryside and that they anticipate this approach will remain largely unchanged as outlined in paragraph 5.38 of the Issues and Options document.

- 2.31 We agree with the general approach to the countryside, but this needs to be balanced with the existing policies reflecting the NPPF and steer growth to the most sustainable locations within the plan area. We urge the Council to be more open towards developments in the countryside which can positively benefit the sustainability of locations in the Green Belt and other settlements where no harm to the purposes of including the land within the Green Belt can be demonstrated. For example, developments in these locations can increase the viability and vitality of existing services and facilities within a settlement and providing new ones.
- 2.32 We appreciate that Chelmsford is a Green Belt authority, and that it is important to protect the Green Belt. However, the NPPF allows for Green Belt release in exceptional circumstances. We believe that this is an opportunity for the Council to review the Green Belt Boundaries and ensure that the appropriate areas are supported by an up-to-date evidence base and not just carried forward into the new plan.
- 2.33 It should be noted that the current text in Strategic Policy S11 aims to support thriving rural communities whilst ensuring that development does not have an adverse impact on the different roles and character of the countryside. We believe the best way to guarantee that rural communities continue to thrive is to allocate a variety of sites across the plan area following a robust and credible review of the Green Belt boundaries so that appropriate developments such as Land at Ongar Road, Writtle can assist in ensuring the future vitality and viability of Writtle.

Q28 – Q32 Meeting the Needs for New Homes

- 2.34 We agree with the Council's approach to plan for more than the minimum housing requirement. The 20% supply buffer is a good strategy as it provides more flexibility to the delivery of housing across the plan area. It also allows for the Council to meet its housing needs and significantly boost housing delivery as required by the NPPF.
- 2.35 The approach 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 (such as Ongar Road, Writtle) across the plan area.

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

- 2.36 It is agreed that high quality design is essential to making places more attractive, sustainable, distinctive and safe and this principle should apply to all sustainable settlements across the plan area and all levels within the settlement hierarchy.
- 2.37 With regards to the suggested update to design codes, we believe the Local Plan should provide details which brings clarity on what is expected of developments which are not of "strategic scale" and in which parts of the plan area these will cover.

- 2.38 Sites such as Ongar Road, Writtle which are currently in the Green Belt can be designed to accommodate high quality design which relate to the location and specific surroundings of the settlement. By identifying a site for allocation and Green Belt release, the Local Plan can also include design expectations in consultation with the developer in the form of Design Codes and seek to ensure that the development promotes a healthy place for all.

Q48 – Q50 Infrastructure.

- 2.39 It is agreed that the provision of appropriate and timely infrastructure to support growth is important to the continuing prosperity, attractiveness and sustainability of Chelmsford.
- 2.40 It should be recognised that growth and housing allocation within the Green Belt communities has the ability to deliver improved infrastructure within these locations, with the potential provision of, inter alia, walking and cycle routes subsequently contributing to meeting the Council's aspiration in improving sustainable and active travel opportunities.
- 2.41 Furthermore, developments in settlements such as Writtle can also help increase the viability and the vitality of existing services and facilities and make provision for future facilities in the form of CIL payments and any site-specific infrastructure requirements.
- 2.42 Land at Ongar Road, Writtle is uniquely capable of providing infrastructure that supports the sustainable growth of the community and contributes to overall provision across the plan area.
- 2.43 It is welcomed that the Council recognises that the need for new infrastructure requirements should not impact the viability of developments. This will minimise the unnecessarily costly infrastructure that will place a burden on CIL and S106 contributions to the detriment of delivering other necessary aspects, 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 & Q58 Spatial Principles

- 2.44 We welcome the updates to the Spatial Principles and agree that these should be reviewed as part of the emerging Local Plan.
- 2.45 We agree that development in the form of future site allocations should be located at well-connected and sustainable locations across the Chelmsford City Local Plan area, however, these principles should also reflect that well-connected sustainable locations are also found in the Green Belt and therefore have a role to play in contributing to the wider spatial strategy making it more deliverable.

- 2.46 Writtle is within the Green Belt and the Spatial Principles need to reflect the opportunities that are available in such settlements. As a higher order settlement, Writtle is well served in terms of services and facilities and is well located to the Chelmsford City Centre and therefore is well connected via sustainable modes of transport and travel.
- 2.47 Land at Ongar Road, Writtle can align with many of the proposed Spatial principles. Writtle is a higher order settlement which is well connected and in a sustainable location. Previous Local Plans and decisions of the local planning authority have meant that Writtle has not had many new homes for a significant period of time which raises concern over the viability of the local community and the opportunity for demographic changes to reflect a healthy housing market brought about by a choice of housing types and tenures and churn of property transactions.
- 2.48 Development in this location can be designed to respect the character and appearance of the landscape, as well as the built and natural environment. The site is not constrained by flood risk and can contribute to the necessary infrastructure over the plan period. The Hill Residential Ltd. are committed to delivering the site in line with a positive site allocation within the plan period to support the Council's housing delivery targets.
- 2.49 In our view the future stage of the emerging Local Plan will need to provide clarity as to how these Spatial Principles will be used and implemented and how the Council will strike the balance at both the plan making and decision making stages by using these principles.

Q62 & Q63 Spatial Strategy

- 2.50 We note the potential strategies put forward by the Council within the Issues and Options document (Approach A-E) but have concerns and reservations about each of these and their ability to achieve sustainable development as required by the NPPF but also align with the vision and spatial principles set out by the Council.
- 2.51 Each of the approaches has limitations and would lead to significant compromise in order to deliver the vision and spatial principles that are being consulted on. For example, growth in urban areas may achieve an element of new homes and jobs within the urban area, the lack of previously developed land in the City Centre would require a significant densification if growth were to be focused there. Densifying urban areas can lead to issues relating to congestion and poor air quality, therefore failing to meet the Council's strategic priority to promote the health and social wellbeing of communities. Although some sustainable growth is possible within the urban areas, the Council would not be able to meet the growing needs of the city by solely allocating land within the urban area.

- 2.52 We recognise that new settlements can provide housing for periods beyond the Local Plan, and due to their scale, they are also able to provide infrastructure improvements for the benefit of existing local communities. However, in our view, the Adopted Local Plan is already focused on growth within new settlements. Chelmsford Garden Community has already been allocated 3,000 homes in the Adopted Local Plan, and at least 1000 new homes in this review. If the Council were to focus all residential growth in a new settlement, the growth of existing settlements in Chelmsford would be stagnant.
- 2.53 The current Local Plan also seeks to direct development away from the Green Belt and as outlined within paragraph 6.39 of the Issues and Options document the approaches put forward (A-E) do not include any review of the Green Belt boundaries. The Council's conclusion "we do not believe that there are exceptional circumstances which would warrant a departure from national planning policy" is flawed and does not align with the tests of soundness in the NPPF under which the Local Plan will be examined in the future.
- 2.54 As part of the considerations to Spatial Approach to development and distribution of growth across the plan area, the Council should be reviewing the Green Belt boundaries and seeking to follow the principles of sustainable development and ensuring that all existing settlements in the plan area (including Green Belt) are supported and are not left to stagnate.
- 2.55 The Council in the "Important Note" after paragraph 6.51 of the Issues and Options document, acknowledged that the preferred approach seen in future stages of the Local Plan preparation may not be one of the five (approach A-E) listed but a combination of the most sustainable and deliverable elements. We are pleased to see that the Council identify that the strategy can be something other than that consulted upon based on the results of the consultation and the emerging evidence base.
- 2.56 We therefore support the need for Chelmsford to focus their spatial strategy on growing existing settlements (including those in the Green Belt) across the plan area. Focussing growth within settlements dispersed across the plan area would contribute to ensuring the vitality of these existing settlements by increasing economic spending within these areas and providing infrastructure improvements for the benefit of new and existing residents. Such a spatial strategy would also support the vitality and viability of communities in the Green Belt and ensure that these locations continue to thrive.
- 2.57 Chelmsford City Council should take a balanced spatial strategy, with an appropriate scale of allocations in all sustainable settlements (including Green Belt) across the plan area. By utilising previously developed land in urban areas and larger villages, alongside site allocations in all settlements (both inside and outside the Green Belt) within the settlement hierarchy, depending on the deliverability of each site a balanced strategy can be achieved. Approach C is perhaps the closest in nature that we outline but we consider that a wider strategy which provides growth opportunities across the plan area would be the most sustainable for the emerging Local Plan.

Part 7: Development Standards

Q64. Do you support the approach being taken? If you disagree, please explain why?

- 2.58 The Local Plan review is an opportunity for the Council to reconsider and reflect on the adopted standards to ensure that they are still fit for purpose and supported by a robust evidence base to provide a foundation on which to make future decisions. In light of the current events of the world, such as the climate crisis, the COVID-19 pandemic, and the more recent cost of living crisis, there should be potential for these standards to be revisited as part of the Local Plan review.

3. LAND AT ONGAR ROAD, WRITTLE

- 3.1 Land at Ongar Road, Writtle is made up of two parcels, one north and one south of Ongar Road. A site plan is provided in Appendix One.
- 3.2 The land at Ongar Road is 14.2ha in size and provides opportunity for a sustainable residential led development that can meet the needs of Writtle over the future plan period as well as contributing to those for the City Council.
- 3.3 Hill Residential Ltd. is an award winning 5-star housebuilder which seeks to create a range of beautiful and award winning new homes and sustainable communities. Hill seek to incorporate the needs and aspirations of the community at every step of the way to ensure that approach to new developments is built around and informed by the priorities of the local area.
- 3.4 As a modern and sustainable development site, the land at Ongar Road will enable the Council to identify a deliverable and developable site allocation that can be brought forward to contribute to sustainable development across Chelmsford.
- 3.5 As a site currently within the Green Belt, the allocation of the land will require a full, comprehensive and robust evidence base on which the emerging Local Plan can identify sites for release from the Green Belt.
- 3.6 On a site of this nature, Hill anticipate that a variety of dwelling sizes and tenures (including both market and affordable provision) which will meet the needs of the local community relating to accessibility and adaptability over the plan period can be delivered. Alongside the delivery of residential homes, the site is also capable of achieving a variety of site wide infrastructure to ensure local needs are met and existing infrastructure is maintained and complemented by further provision of contributions to those through Community Infrastructure levy receipts.
- 3.7 Alongside the details provided in these representations to the Issues and Options consultation document, the site has also been submitted to the Council as part of the “call for sites”.
- 3.8 It is understood that the sites are already included within the Council’s SHELAA but the information has been updated to reflect the change in organisation promoting the site for Green Belt release and allocation in the emerging Local Plan.

- 3.9 The 2021 SHELAA identifies the land at Ongar Road as sites CFS213 (potential yield of 250 dwellings) and CFS214 (potential yield of 82 dwellings). The assessments show that the site is relatively unconstrained in terms of natural or environmental constraints and generally both perform well against these criteria. The SHELAA also acknowledges that the sites can collectively deliver 382 dwellings and are in close proximity to employment and retail facilities and are served by public transport. Both CFS213 and CFS214 have received low scores in the assessment due to the existing Green Belt designation covering large parts of the Chelmsford Local Plan area and as outlined above the Local Plan Review provides the appropriate opportunity for the SHELAA methodology and evidence base to be revisited and for the Council to consider a review of the Green Belt boundaries.
- 3.10 Through the Local Plan Review, we will continue to work and engage proactively with the Council to assist in the review of the Green Belt boundaries as well as identifying an appropriate capacity for the site with the intention of seeking to establish a positive allocation on a site which can achieve sustainable development.

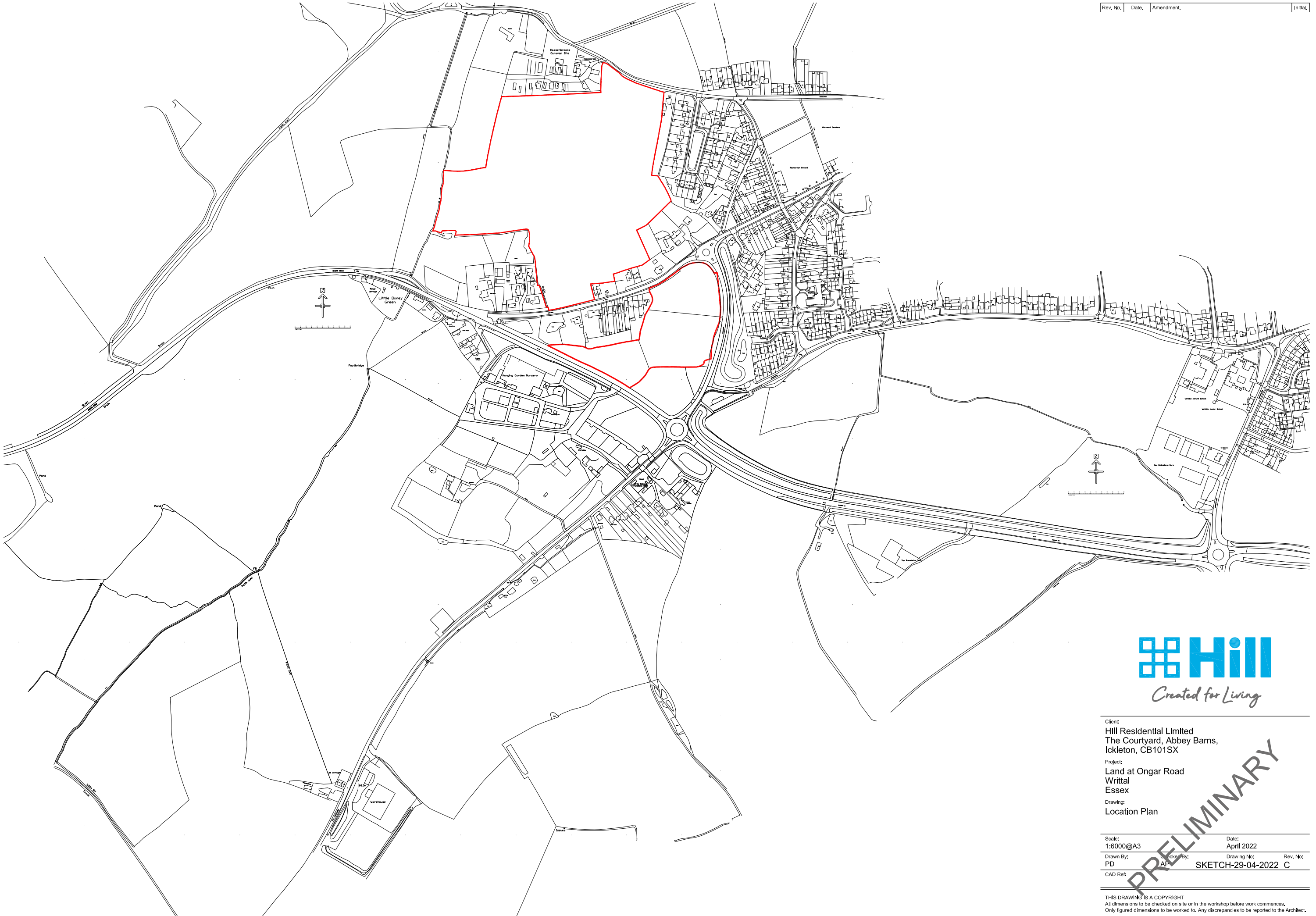
Writtle Neighbourhood Plan

- 3.11 The Writtle Neighbourhood Plan has been prepared by the Parish Council and was formally “made” in December 2021. The recently made Neighbourhood Plan and the Chelmsford City Council Local Plan provide an up-to-date policy framework under which future considerations and decisions can be made.
- 3.12 The Neighbourhood Plan covers a number of different themes and includes specific policies relating to various issues. However, as the Local Plan is reviewed by the City Council it will be important for the local community to keep their Neighbourhood Plan up to date and subject to similar type of review.

4. CONCLUSION

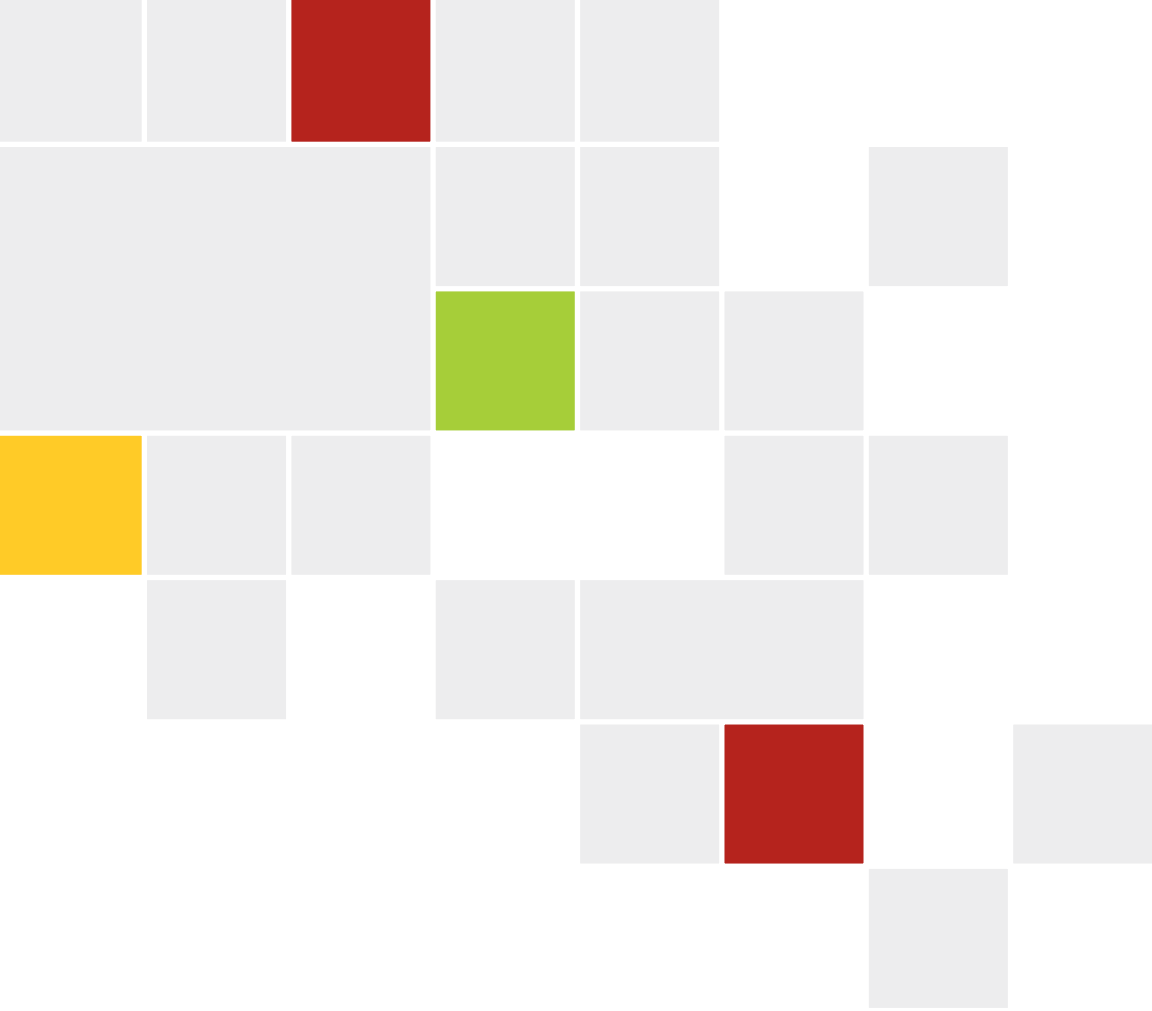
- 4.1 These representations have been prepared by Boyer on behalf of Hill Residential Ltd., in response to the Chelmsford Local Plan Review 2022 Issues and Options (Regulation 18) consultation. At this stage of the review there are no draft policies, rather these representations respond to the overall strategy and vision for the next stage of the Local Plan Review.
- 4.2 These representations make specific reference to land at Ongar Road, Writtle The site is being promoted for future development and these representations relate to the overall strategy proposed in this emerging Local Plan and the development potential of this site. The site represents a suitable location for development and is considered a logical organic extension to Writtle.
- 4.3 Within the representations above, we have sought to address the general nature of the consultation questions and provide input into the preparation of the Local Plan Review. The comments made reflect the nature of the NPPF and have been provided within the context of the tests of soundness.
- 4.4 We consider that the Local Plan Review provides the opportunity for the Council to consider the Green Belt boundaries and undertake a comprehensive review as they prepare a plan to cover the period to 2041. By not undertaking a review of the Green Belt and therefore ignoring the potential that well connected and sustainable settlements, such as Writtle have the approach is flawed.
- 4.5 A Local Plan needs to take into account all the reasonable options and alternatives and as currently prepared the Council have not done so as required by the NPPF, the Planning Practice Guidance and examples of best practice.
- 4.6 At this early stage of plan preparation, the Council is able to undertake further evidence gathering exercises as they prepare a robust and credible evidence base that takes into account the Green Belt within their plan area and addresses other responses received.
- 4.7 We look forward to engaging with the Council on future stages of the Local Plan.

APPENDIX ONE – SITE LOCATION PLAN



Client:			
Hill Residential Limited The Courtyard, Abbey Barns, Ickleton, CB101SX			
Project:			
Land at Ongar Road Writtal Essex			
Drawing:			
Location Plan			
Scale:		Date:	
1:6000@A3		April 2022	
Drawn By:	Checked By:	Drawing No:	Rev. No:
PD	AP	SKETCH-29-04-2022	C
CAD Ref:			

PRELIMINARY



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