

19.10.2022

Maldon District Council Response to Chelmsford City Council Local Plan Review Issues and Options Consultation

Close Date: Thursday 20 October 2022

To be submitted via online consultation portal

Questions

(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.

Yes

(Q4) Are there any strategic priorities you think should be added? Where possible, please support your answer with reference to any evidence.

Maldon District Council welcome the new climate emergency priority and sustainable transport priority, particularly given Chelmsford City Council (CCC) declared a climate emergency in 2019 and has committed to moving towards net zero. We expect CCC to follow the evidence available in order to inform the strategic priorities. We acknowledge that we will be working together as part of the duty to co-operate in relation to strategic cross-boundary issues.

(Q30) Should we be considering any alternative options for a housing supply buffer?

It is considered appropriate to include a buffer figure in housing targets, as this allows for flexibility in terms of any housing allocations not delivering their forecast total anticipated number of units and for any unprecedented delays to deliverability. This should also enable the Council to have a greater likelihood of maintaining a 5 Year Housing Land Supply. A buffer of at least 10% would be considered appropriate and therefore the proposed 20% buffer is supported. A buffer may help prevent shortfalls in the future.

(Q57) Do you agree with the proposed updates to the spatial principles? (Answer yes/no). If not, please explain why. Please refer to the spatial principle number in table 7.

Yes

(Q58) Are there any spatial principles you think should be added? Where possible, please support your answer with reference to any evidence.

The spatial principles should have regard to strategic and cross boundary issues in neighbouring authorities to ensure there is awareness of matters such as education, road capacity, opportunities and growth in neighbouring areas. By disregarding administrative boundaries, this can allow for more effective strategic planning, benefitting a wider area.

As Chelmsford City Council has declared a climate emergency, it is advised that climate mitigation is at the forefront of the spatial principles.

It is noted that the wording in relation to previously developed land has been altered from 'optimise' in the adopted Local Plan to 'promote' in the proposed spatial principles. The use of the word 'promote' indicates a more watered-down approach to building on previously developed land than in the adopted local plan. Whilst the National Planning Policy Framework (NPPF) encourages the use of previously developed land where suitable, we would note that some areas of previously developed land may not be located in areas

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appropriate for development, i.e., in unsustainable locations. We would also note that some areas of previously developed land can often have high biodiversity value.

**(Q60) Do you support the approach to be taken to review the spatial strategy?
(Answer yes/no). If not, please explain why.**

Yes

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

There is a table to fill out for this question (agree/disagree etc) but we don't feel we enough information so this will not be completed.

Have we missed anything?

In the consultation document, there are tables listed under each approach, which show the location type / where / indicative number of new homes. Where 'expanding allocated sites' is shown, the North East Chelmsford Garden Community indicates the number of indicative new homes, as well as the 3,000 within the adopted Local Plan. This is not shown for the allocated sites at South Woodham Ferrers or West Chelmsford and East Chelmsford. It would have been useful to have shown the housing numbers at these sites in the adopted Local Plan, for consistency.

Maldon District Council have concerns over the level of development proposed in South Woodham Ferrers, Woodham Ferrers, Bicknacre and in and around Danbury. There are concerns over the capacity of the road network and how the increase in traffic could affect our District, both inward traffic flows and the ability of residents to leave to District, notably for employment and education purposes outside the District. Approaches A, C and E are particularly pertinent, due to the level of housing near to the border of Maldon District which, it is felt would have a significant impact on the road network leading to Maldon and Burnham, not only the main roads but also the rural road network.

Notwithstanding the above, there is not enough information at this time to strongly support or oppose any particular option, however, Maldon District Council are keen to work with Chelmsford City Council on strategic cross boundary issues, taking into account the relevant evidence base including transport modelling, when more information is available, through the duty to co-operate and working with partners such as Essex County Council. Maldon District Council can provide comments and assistance at the appropriate time.

As Maldon and Chelmsford are at similar stages in the local plan review process, we expect to work together to ensure that the growth options for both authorities integrate appropriately.