**Great Waltham Parish Council**

**Response to Chelmsford City Council’s *Review of Adopted Local Plan – Issues and Options Consultation 2022***

**Optional Monitoring**

OM1. Are you a resident within the Chelmsford City Council area?

**Great Waltham Parish Council represents residents within the Chelmsford City Council area.**

OM2. How did you hear about the consultation?

**We were made aware by Chelmsford City Council.**

**Challenges and Opportunities**

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.

**Generally, we agree with the key challenges and opportunities cited. However, is there not an additional challenge to be noted in terms of there being the financial wherewithal available to execute the plan successfully and particularly managing the strength of its resilience to external shocks such as looming inflationary and recessionary pressures, whatever their source? In the same way, we believe it important to be realistic about there being a key opportunity of *“a strong and growing economy and employment base”* when many of the current financial indicators suggest the opposite will be true.**

**Vision**

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

**Our only concern relates to the exclusive focus on ‘growth’ when a more inclusive word such as ‘adaptation’ could be more appropriate. This would not only encompass growth, which doubtless has to occur in some form or another, but also include refinement of what’s already in place to achieve the same goals (of a *“greener, fairer and more connected community”*). Concentrating solely on growth implies a lack of focus on preserving and improving what already exists.**

**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.

**Following on from our response to Q.2, we have a preference for referencing adaptation as well as growth. For instance, there is no mention of enforcement action to bring empty properties into occupation as a solution for the current undersupply, rather just a focus on constructing new homes.**

**Also, while not a criticism *per se* (as it’s difficult to understand the full effect anywhere), is there not a need to recognise that the spatial model of city centre retail concentration has been broken to the extent that regeneration of what went before is no longer a sound strategy?**

Q4. Are there any Strategic Priorities you think should be added? Where possible, please support your answer with reference to any evidence.

**We believe there is work to be done to bring empty homes into occupation. According to the House of Commons Library briefing paper *Empty housing (England)* published on 21 October, 2020 (available online at https://commonslibrary.parliament.uk/research-briefings/sn03012/):**

***Statistics published by the Ministry of Housing, Communities and Local Government (MHCLG) put the number of empty homes in England in October 2019 at 648,114. This represents a 2.2% increase on the previous year’s total. Of the 648,114, 225,845 were classed as long-term empty properties (empty for longer than six months).***

**A number of these properties will doubtless be in the City Council’s area. We note from the same document that:**

***Local authorities have a range of powers and incentives at their disposal to bring empty homes back into use. These include, but are not limited to, Empty Dwelling Management Orders, Council Tax exemptions and premiums, enforced sales, compulsory purchase, and measures to secure the improvement of empty properties. There are also a range of other initiatives and incentives that can help reduce the number of empty properties, including the sale of empty Government-owned properties, planning measures and Value Added Tax (VAT).***

**There would seem to be scope for the City Council to take action, thereby reducing the need for new build units.**

**Addressing the Climate and Ecological Emergency**

Q5. Do you support the approach being taken? If you disagree, please explain why?

**We agree that carbon net zero targets should be reduced to minimum reasonable timescales and are therefore pleased to see the adoption of the recommendations of the Essex Climate Action Commission.**

**The City Council will be aware of the proposals made under National Grid’s East Anglia GREEN project for the construction of power lines across the region, including our parish. We oppose what is currently being proposed, and understand an alternative offshore route would assuage many of our concerns. As this stage we are not sure whether this would conflict with the South East Inshore Management Marine Management Plan being recommended for adoption in this consultation.**

**We assume the proposed prioritisation of *“ensuring new streets are tree-lined”* will be thoroughly considered in terms of the possible future subsidence/ground heave effects mature trees will have on the build environment (witness the issues today with London plane trees).**

Q6. What are your views on the Council’s current climate change and flood risk local planning

policies and the decisions they lead to?

**We have encountered no issues as they affect the planning applications we review as consultee for developments in our parish.**

Q7. What are your views on the subject areas identified for new policies or significant changes to existing policy?

**In relation requiring community scale renewable energy generation on all large-scale developments, we believe the word *“consider”* should be replaced with *“include”*. We understand the possible cost implications, but having an easy opt-out negates the possibly of ensuring meaningful change.**

Q8. Have we missed anything? Where possible, please support your answer with reference

to any evidence.

**We have no comments to make.**

**Promoting smart, connected active travel and sustainable transport**

Q9. Do you agree with the proposed approach being taken? If not, please give the reasons

for your answer.

**We believe Local Plan policies should include proactive action to retrofit public electric vehicle (EV) charging points in residential areas. We are mindful that some of our residents will find it difficult to convert to EVs without access to such facilities, given their properties cannot be accessed by their vehicles for home charging and/or that installation at their homes is prohibitively expensive. This issue is even more relevant for rented properties where occupiers are unlikely to invest and/or be allowed by landlords to adapt properties. We see that the proposed policy changes focus exclusively on charging points for new housing developments.**

Q10. Do you have any views on the Council’s current local planning policies of relevance to smart, active travel and sustainable transport and the decisions they lead to?

**We understand and support the focus on smart, active travel and sustainable transport, but have some concerns that often new initiatives are not particularly inclusive for many of our residents. For instance, in terms of their age/mobility and the remoteness of their properties. We acknowledge that sometimes this is unavoidable (for example, the use of e-scooters), but welcome and prefer those initiatives which have the broadest possible appeal.**

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

**See our answer to Q.9.**

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

**The only new policy seems to be *15/20 Minute Walkable Neighbourhoods* which we support in principle, provided there is still provision for those whose mobility means they cannot walk/cycle 15/20 minutes or when things such as adverse weather make walking/cycling difficult or unsafe.**

Q13. Have we missed anything? Where possible, please support your answer with reference

to any evidence.

**We have no comments to make.**

**Protecting and enhancing the Natural and Historic Environment, and support an increase in biodiversity and ecological networks**

**Historic Environment**

Q14. Do you agree with the proposed approach being taken? If not, please give the reasons for your answer.

**We found this section rather nebulous and potentially contradictory. On the one hand you cite the relevant policies for the historic environment (s.5.23) saying they will *“conserve and where appropriate enhance the historic environment”*, yet go to say *“a key objective will be to enhance and celebrate the historic environment, rather than concentrating on preservation or avoiding harm”*, going on to suggest this phrase is reflected in the proposed updated vision (s.5.28). Is it possible to conserve without preserving and avoiding harm? What does ‘celebrate’ actually mean – it seems to be a modern buzzword which could mean something to everyone without being at all specific. The proposed vision is *“Guiding Chelmsford’s growth towards a greener, fairer and more connected community*” – at best, it’s reflection in the key objective in s.5.28 seems decided opaque. If nothing else, we feel the approach and intention here needs to be made clearer.**

Q15. Do you have any views on the Council’s current local planning policies of relevance to the historic environment and the decisions they lead to?

**We have encountered no issues as they affect the planning applications we review as consultee for developments in our parish.**

Q16. Have we missed anything? Where possible, please support your answer with reference

to any evidence.

**See our answer to Q.14.**

**Natural Environment**

Q17. Do you support the approach to be taken? If you disagree, please explain why?

**Yes, we agree with the approach being taken.**

Q18. Do you have any views on the Council’s current local planning policies of relevance to the natural environment and the decisions they lead to?

**We have encountered no issues as they affect the planning applications we review as consultee for developments in our parish.**

Q19. Do you have any views on the proposed ideas for new policies?

**We agree with the new policies, taking into account the relevant part of our response to Q.5.**

Q20. Have we missed anything? Where possible, please support your answer with reference to any evidence.

**We have no comments to make.**

**Ensuring sustainable patterns of development and protecting the Green Belt Countryside**

Q21. Do you support the approach to be taken? If you disagree, please explain why?

**We do have concerns regarding the increased sprawl created by the footprint of new housing developments and the encroachments into green spaces. We believe this should be kept to a minimum, so our preference is for concentrated areas of development to minimise the need for developing new land, hence also removing some of the the need for enhanced active travel corridors.**

Q22. Do you have any views on the Council’s current local planning policies of relevance to the countryside and the decisions they lead to?

**We have commented on new developments close to our parish to raise concerns about “insufficient assessment […] of those wider new and upgraded infrastructure requirements which will be needed for [a] development to be a success”. We believe that ‘edge of the City’ developments especially often have the potential to adversely impact the countryside which are not always addressed sufficiently. Once a green area is built or paved over, it’s lost forever.**

Q23. Have we missed anything? Where possible, please support your answer with reference to any evidence.

**We have no comments to make.**

**Special Policy Areas (SPAs)**

Q24. Do you agree with the proposed approach being taken? If not, please give the reasons for your answer.

**We understand the reasons the proposed approach is being taken. As alluded to in our answer to Q.22, we have concerns that the SPA 1 and SPA 2 developments will have adverse effects on our parish, even though they are outside our boundaries. In particular, these include impacts not only on local transport networks generally, but also all other important infrastructural elements such as employment opportunities, and health, recreational and retail facilities.**

Q25. Do you have any views on the Council’s current Special Policy Areas and the decisions they lead to?

**See our previous answers. We are not always (ever?) convinced that SPA developments fully acknowledge the adverse quality of life factors generated by their implementation. In particular, despite policy wordings and commitments, there always seems to be lag between development and infrastructural requirements – sometimes we feel we gap is never fully bridged.**

Q26. Are there any additional Special Policy Areas you think should be added? Where possible, please support your answer with reference to any evidence.

**No, we think there are quite enough already.**

Q27. Have we missed anything? Where possible, please support your answer with reference

to any evidence.

**We have no comments to make.**

**Meeting the needs for new homes**

**Housing**

Q28. Do you support the approach being taken? If you disagree, please explain why?

**See our answer to Q.4 regarding empty properties.**

**We understand the need for new housing, but have concerns that the proposed overall increase of 22,800 is more a neat mathematical outcome than a product of a deep dive to understand residents’ views on what they want their city to become. There seems to be little attention given to the provision of social housing which for many, in the absence of any likely prospect of achieving home ownership or being able to find affordable private rents, may well become a more important (or perhaps, only) way of making an independent new home. As things stand, it is likely that fewer people will be able to afford even ‘affordable’ homes. We believe that more council-owned social housing would improve the situation.**

Q29. Do you have any views on the Council’s current housing policies and the decisions they lead to?

**We support any proposal for the lowest possible overall development site figure for the requirement to include the provision of affordable housing units.**

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

**We are not convinced of the need for a supply buffer, or at least one of 20%. Which performance target (of achieving the number of new build properties in a given year/period) is actually being set?**

**In terms of land supply, we understand the desire and accept the need for small micro-development sites in our parish, but believe than major development should be confined to existing built-up areas.**

Q31. Do you have any views on the proposed ideas for new policies or significant changes?

**We agree with all the new policies and significant changes mentioned, although are surprised that many of them are not already best practice. What seems to be missing is any enhanced commitment to pre-development engagement with local communities and their representatives.**

Q32. Have we missed anything? Where possible, please support your answer with reference

to any evidence.

**We have no comments to make.**

Gypsy and Traveller Accommodation

Q33. Do you support the approach being taken? If you disagree, please explain why?

**Yes, we support the approach.**

Q34. Do you have any views on the Council’s current Gypsy, Traveller and Travelling Showpeople policies and the decisions they lead to?

**We have no particular views. In recent years we have experienced one incident of unauthorised access to one of our recreation grounds and we were able to resolve the situation under existing regulations. We would be concerned if the proposed approach were to result in any increased likelihood of similar incidents.**

Q35. Have we missed anything? Where possible, please support your answer with reference

to any evidence.

**We have no comments to make.**

**Fostering growth and investment and providing new jobs**

**Jobs/Employment and Economic Growth**

Q36. Do you support the approach being taken? If you disagree, please explain why?

**Yes, we support the approach.**

Q37. Do you have any views on the Council’s current employment policies and the decisions they lead to?

**We have no comments to make.**

Q38. Do you have any views on the key economic and employment related issues identified so far?

**We especially support economic development which integrates smoothly in rural areas like our own; that is, without disrupting its existing character. We have examples of small businesses operating out of what were traditionally agricultural premises, and we are likely to welcome proposals for similar small-scale developments.**

Q39. Have we missed anything? Where possible, please support your answer with reference to any evidence.

**We have no comments to make.**

**Creating well designed and attractive places, and promoting the health and social wellbeing of communities**

**Community assets**

Q40. Do you support the approach being taken? If you disagree, please explain why?

**The adequate provision of complementary community assets is often an area which gives us and other residents cause for concern. S.5.86 says: *“New developments must also be supported by community facilities that serve its needs”*. Often it is observed that new developments create additional pressure on local transport, educational, health and recreational assets. This can be matter of timing, but there also seems to be an assumption of being able to take up a slack within current provisions which doesn’t actually exist.**

**Your list of important community assets does not include libraries. We believe the Council should make (or lobby for other authorities/agencies to make) extra provision for library services.**

Q41. Do you have any views on the Council’s current community asset policies and the decisions they lead to?

**See our comments in answer to Q.40.**

Q42. Have we missed anything? Where possible, please support your answer with reference to any evidence.

**See our comments in answer to Q.40.**

**Design**

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

**Yes, we support the approach.**

Q44. Do you have any views on the Council’s current design policies and the decisions they lead to?

**We accept that someone has do decide what is ‘beautiful’, but would encourage interpretation and decision-making to be heavily informed by local residents who ultimately have to live with the long-term consequences.**

Q45. What would you consider to be ‘beautiful’ in terms of development?

**This is very subjective and to some extent depends whether you’re looking at or out from a particular property. We accept most people are naturally conservative and are unsettled by development styles which vary too much from what exists already. However, we have a ‘model village’ development in our parish with an external design which was considered quite radical when built in the 1970s. Nevertheless, its style has come to be accepted and enhances the overall character of our area. Despite this, we suspect the majority of our residents would expect developments in their neighbourhood not to be appreciably different from existing styles and designs.**

Q46. Do you have any views on the proposed ideas for new policies or significant changes?

**The Livewell Development Accreditation only ‘encourages’ developers to promote physical and mental health in the design process. This seems to be quite weak. Wouldn’t it be better to insist that developers take this approach and for them to provide evidence of how it has been considered and achieved?**

Q47. Have we missed anything? Where possible, please support your answer with reference

to any evidence.

**We have no comments to make.**

**Delivering new and improved infrastructure to support growth**

**Infrastructure**

Q48. Do you support the approach to be taken? If you disagree, please explain why?

**For us the issue here is less the approach and the policies which support it, more the execution and delivery of infrastructure changes. Many of our residents remark on the lag between new developments and the implementation of new/enhanced services. Whether this is the result of insufficient or errant planning in the first place or the willingness or wherewithal to follow projects through seems somewhat academic if the outcome experienced is increasingly congested roads and longer waiting times for health services etc.**

**We believe there remains a gap between our people’s reasonable expectations and what gets delivered.**

Q49. Do you have any views on the Council’s current infrastructure policies and the decisions they lead to?

**See our comments in answer to Q.48.**

Q50. Have we missed anything? Where possible, please support your answer with reference to any evidence.

**We have no comments to make.**

**Encouraging resilience in retail, leisure, commercial and cultural development**

**Retail and Designated Centres**

Q51. Do you support the approach to be taken? If you disagree, please explain why?

**Yes, we support the approach.**

Q52. Do you have any views on the Council’s current retail policies and the decisions they lead to?

**We agree with the comments in s.5.111 that a more flexible approach has to be taken into city/town centre uses. Ours is rural parish so visiting city/town centres has to be made attractive, and this is likely to be less so if a primary focus on retail is maintained.**

Q53. Have we missed anything? Where possible, please support your answer with reference to any evidence.

**We have no comments to make.**

**Encouraging resilience in leisure, commercial and cultural development**

Q54. Do you support the approach to be taken? If you disagree, please explain why?

**Yes, we support the approach.**

Q55. Do you have any views on the Council’s current leisure, commercial and cultural policies and the decisions they lead to?

**As mentioned elsewhere in our response, we believe new-build developments should be concentrated in existing built-up areas, and this should follow through into many aspects of the provision of leisure, commercial and cultural facilities.**

Q56. Have we missed anything? Where possible, please support your answer with reference to any evidence.

**We have no comments to make.**

**Spatial Principles**

Q57. Do you agree with the proposed updates to the Spatial Principles? If not, please give the reasons for your answer. Please refer to the Spatial Principle number in Table 7.

**Principle e)**

**We do not agree that Small Settlements should be included in the Local Plan Settlement Hierarchy. We believe there is enough scope in existing built-up areas to accommodate the projected growth targets. Indeed, the same may well be the case for Service Settlements.**

**Principle g)**

**As mentioned elsewhere in this response, we believe there is scope to retrofit facilities which reduce carbon emissions into existing built environments. For example, installing public access electric vehicle charging points.**

**Principles h) and i)**

**As mentioned elsewhere in this response, any development must not overburden the existing infrastructure and always be accompanied by complementary improvements if that cannot be achieved. There is a general feeling that these principles are not being met in the immediate area of some developments and are not being considered across sufficiently wide areas to address impacts in neighbouring parishes.**

Q58. Are there any Spatial Principles you think should be added? Where possible, please support your answer with reference to any evidence.

**We have no comments to make.**

**Spatial Strategy**

Q59. Do you support the changes to the methodology and criteria note of the Strategic Housing and Employment Land Availability Assessment (SHELAA)? If you disagree, please explain why?

**As indicated in our response to Q.57, we believe that the allocation of areas in our parish to the Small Settlements category is unnecessary and we would therefore oppose any proposals for significant development accordingly.**

Q60. Do you support the approach to be taken to review the Spatial Strategy? If you disagree, please explain why?

**We support the focus on growth in urban areas and the expansion of allocated sites, but have a preference for avoiding developments in larger and smaller villages.**

**We support the process of identifying different Spatial Approaches, but not all of the proposed Approaches themselves.**

Q61. Do you agree with the scope and classification of individual settlements within the Settlement Hierarchy? If you disagree, please explain why? Where possible, please support your answer with reference to any evidence.

**See our answers in Q.57.**

Q62. How do you feel about the types of locations for potential housing development growth (growth in urban areas, expanding allocated sites, growth along transport corridors, development at larger villages, development at smaller villages, large new settlement/garden community)? Please indicate whether you strongly support, support, neither oppose or support, oppose, strongly oppose. Have we missed anything?

**We neither oppose or support Approach A. We strongly support Approaches B and E. We strongly oppose Approaches C and D.**

Q63. Are there any Spatial Approaches that the Council has missed?

**We have no comments to make.**

**Development standards**

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

**Yes, we support the approach.**

Q65. Do you have any views on the Council’s current development standards and the decisions they lead to?

**We have no comments to make.**

Q66. Are any development standards missing, should anything be changed or do some standards require further clarification to aid interpretation? Where possible, please support your answer with reference to any evidence.

**We have no comments to make.**